

**Project 21 comments to the Federal Register on the proposed
Council on Environmental Quality rule related to reform
of the National Environmental Policy Act
(CEQ-2019-0003, RIN: 0331-AA03)**

In his State of the Union address, President Donald Trump [heralded](#) a “blue-collar boom” that is “relentlessly pro-worker” and “pro-growth.”

Crediting this to an agenda of sensible regulation, he proclaimed America is now a “place where the action is,” and that “our nation’s manufacturing might” has yielded historic low unemployment figures for chronically disadvantaged groups including blacks, Hispanics, women and those without advanced educations.

And the president has announced what could be his most significant step toward common sense regulation with the proposed White House Council on Environmental Quality (CEQ) rule to [reform](#) the National Environmental Policy Act (NEPA).

As leaders of the Project 21 black leadership network, we are very interested in regulatory reform that enhances black empowerment.

A 50-year-old regulation subjecting major construction projects and land management decisions to an array of permitting and oversight that has not been updated in over 40 years, NEPA unnecessarily impedes the growth and improvement of our economy and infrastructure. Furthermore, it keeps Americans who want to work from being able to find good jobs that will provide them and their families with income, opportunity and advancement.

During the NEPA reform [announcement](#), the President declared that this – along with the overall [“One Federal Decision”](#) policy promoting federal coordination – would “further expand America’s unprecedented economic boom.” CEQ Chairwoman Mary Neumayr said reform offers “a faster process” that would “not change any substantive environmental law or regulation” while refining the review process in a manner that would not “deter investment” or make America “less economically competitive.”

While citing the threat to crumbling American infrastructure and a need to be honest with stakeholders, Secretary of Transportation Elaine Chao explained: “What we need to give, as regulators, is certainty to the regulated community.” And Environmental Protection Agency Administrator Andrew Wheeler noted this “long overdue” reform was needed “decades ago” – citing that all other major environmental regulations have been updated.

All too often, and at the nation’s peril, environmental regulation like NEPA remains coveted and protected from necessary scrutiny. This unwillingness by special interests and the media to embrace review and reform comes at a cost for the economic well-being of American

businesses, investors and workers as well as specifically disadvantaged black Americans seeking jobs in construction, service and related industries.

To combat the deadly coronavirus, the Chinese government reportedly constructed a 1,000-bed hospital in only 10 days. CNN [declared](#) it “a feat of design and engineering.” But CNN does not share this admiration for expediency when it comes to streamlining similar construction projects in the United States. In response to the NEPA reform announcement, a CNN report skeptically [suggested](#) reform “would have the effect of relaxing government efforts to fight climate change.”

In the United States, the 305-bed Stamford Hospital in Connecticut that opened in 2016 took [50 months](#) from conception to ribbon-cutting. And while a hastily built Chinese hospital likely does not live up to American expectations of quality and efficiency, one thing is clear: there is no way, under NEPA rules, that America could similarly compete with the medical crisis China has faced with the necessary speed.

And then there is the climate change charge. Despite the regulatory reform of the Trump Administration thus far and the President’s decision to withdraw from the Paris Accord, the International Energy Agency [noted](#) the United States still had the largest decline in carbon dioxide emissions in 2019 for any country – including those that signed that treaty.

CNN also [perpetuated](#) the suggestion that NEPA reform might increase “environmental racism” – the claim that regulations protect minority communities from alleged burdens imposed by industrial development and public works projects. But the best way to create equality and economic mobility is through good jobs. This was the theme of the famous 1963 civil rights march where Dr. Martin Luther King, Jr. gave his famous “I Have a Dream” speech.

Regulatory reform has increased job prospects. A Project 21 [analysis](#) of federal jobs data noted that the black unemployment rate has reached a record low six times during this administration. It is our hope for this trend to continue.

Project 21, in its [“Blueprint for a Better Deal for Black America,”](#) advocates for adopting a [“minority impact assessment”](#) to examine potential positive and negative effects of proposed federal regulations on jobs, wages, homeownership and consumer prices for minorities in comparison to the general population, with the goal to encourage reflection before pernicious regulation is enacted. This would be a welcome addition to NEPA reform.

Commonsense NEPA reform, with a mindful balance of environmental protection and economic growth, is key to a more productive America that helps all of its citizens.

Horace Cooper
Bishop Council Nedd II
Stacy Washington
Co-Chairmen, Project 21