



WESTERN GOVERNORS' ASSOCIATION

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September 7, 2001

Mr. James L. Connaughton, Chairman
Council on Environmental Quality
Executive Office of the President
17th and G Streets, N.W.
Washington, D.C. 20503

Dear Mr. Connaughton:

On behalf of Western Governors, I am pleased to provide comments on the implementation of the President's Executive Order 13212 by the Council on Environmental Quality. Western Governors share the President's commitment to accelerating the completion of critical energy projects while maintaining safety, public health and environmental protections. We support the direction in the Executive Order requiring the Task Force to "assist agencies in setting up appropriate mechanisms to coordinate Federal, State, tribal and local permitting in geographic areas where increased permitting activity is expected." We also believe the Council's approach to organize work into the functional categories of pipelines, refineries, electricity generation, nuclear, electricity transmission, hydropower, renewable sources and conservation is a productive way of organizing.

Given the vast federal ownership of land and energy resources in the Western states, the work of CEQ with federal land management agencies is critical to our region. Siting of new transmission and pipeline facilities in the West typically requires permits from numerous federal land management agencies.

Recognizing the unique role the federal government plays in the West, and in response to the Council's request for information on opportunities to improve agency decisionmaking, we offer the following suggested next steps.

- CEQ and the Western Governors' Association should organize a workshop this fall of Western state permitting agencies and federal land management agencies and other federal permitting agencies to identify areas of potential collaboration in review of permit and right-of-way applications for electric transmission facilities.
- The information developed at the workshop should be used to fashion a collaborative structure for state and federal agencies to follow when reviewing applications for new transmission facilities.

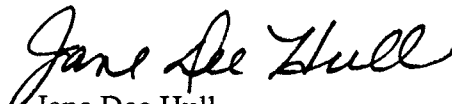
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- Federal agencies and Western states should seek opportunities to apply this collaborative structure to specific transmission proposals in the West.
- The experience from the application of this collaborative structure to specific projects should be assessed and the lessons learned should be used to refine state and federal agency permitting processes.

The Memorandum of Understanding signed by the Western Governors' Association and federal agencies, including CEQ, on August 13 should provide the framework within which the above suggested next steps can be implemented.

Western Governors appreciate the leadership of the President and the Council in recognizing the need to expedite the permitting of energy facilities without compromising other important values. The steps outlined here can help to translate this executive direction into on-the-ground results in the West.

Sincerely,


Jane Dee Hull
Governor of Arizona