

part of your Anchorage hearing record, I have not enclosed copies. However I have enclosed supporting information on the manpower problems we have experienced during the period of pipeline construction which were not addressed in the FPC FEIS.

The second part of my letter has to do with the Council's responsibilities with respect to the development of the environmental impact statements. These comments are of little relevance to your responsibilities and authority under the Natural Gas Transportation Act of 1976, but should, nevertheless, be considered carefully in the development of future regulations guiding the environmental impact information process. Our general recommendations follow:

1. The Environmental Impact Statement process which has evolved since NEPA, including the EIS which accompanied the EL PASO-ALASKA case before the Federal Power Commission is too static and too reliant on the accumulation of data and scientific analysis to be of any value in addressing "impact" on the human environment, and specifically on social, political and economic institutions at the state, local and substate regional level. We agree that data accumulation followed by expert analysis, evaluation, and publication, is important, per se, in the EIS process. However, this activity has traditionally occurred in a vacuum in terms of its relevance to the general public and their more generalized interest in the subject projects.

If, as we believe it must, the EIS process is to have relevance to the general public, there must be a clear, concise statement of the policy parameters and probable effects of the "major federal action" prior to the beginning of the EIS process. Furthermore, this general statement should be prepared by those officials representing the federal agency with the final decision making authority. In addition to the initial statement periodic revisions in the same clear, concise manner, should be issued at regular intervals throughout the EIS process in order to assess the effects on policy of new information generated by the process.

2. In order to avoid the "in house" flavor of the EIS generated documents, some federal financing should be made available to existing public interest organizations involved in activities or questions of policy relevant to the major federal action contemplated. It is our understanding that the Berger Inquiry followed this methodology in developing its report to the National Energy Board in Canada on the gas pipeline issue. The methodology of the Berger Inquiry is one that should be carefully reviewed by the Council on Environmental Quality for application to the EIS process.

The format here is too confined for extended consideration of this important issue. We have generated a great deal of information on the social and