

141/15

My name is Gretchen Starke.

In the 1980s, I worked on teams as writer and editor that developed two federal EISs. Further, in the 1990s, my then employer the U.S. Army Corps of Engineers sent me and two of my fellow employees to Texas for a short course on how to write an EIS. The federal law, the National Environmental Policy Act (NEPA) is not exactly like SEPA, but NEPA was a model for SEPA and the two acts are very similar. In no case have I ever heard of an agency trying to shoehorn an EIS into an already determined conclusion. To do so, would be highly unethical.

The main problem with Councilor Madore's alternative 5, his assumptions, his misleading and inaccurate analysis, his methods, his evasion of meaningful public outreach, and this hearing, is that it was done at all. Others are testifying on the specifics of Alternative 5. I will speak to the councilor's assumption and to the EIS process. For the reason I previously stated, I am offended by Councilor Madore's thoroughly unethical attempt to create his own FEIS for his own Alternative 5.

A final EIS is usually similar to the draft (if not exactly) with perhaps some corrections here and there. The final will include all the comments on the draft -- some comments on the same subject may be grouped together -- along with answers by the writers of the EIS addressing the issue of concern. Even if the answer is simply the word, "noted." What Councilor Madore should do, if he insists on going ahead with his damaging Alternative 5 (and, let's be honest, what Councilor Madore did is not just tweaking an existing alternative, it is creating an entirely new alternative) is to acknowledge that Alternative 5 has extensive adverse environmental impacts, but to declare that he doesn't care, he is going ahead with adopting it anyway. That would be a more honest approach.

Any consultant firm that accepts Madore's conditions, or even bids on the proposal, assuming they knew all the conditions, is unethical. Any outfit that cooks the evidence to fit an already selected alternative should never be hired by any agency or business.

In any case, as Alternative 5 is a new alternative, it is necessary to send the whole mess back to the consultant, whomever that may be, for a thorough analysis of Alternative 5 -- a thorough, honest analysis that shows all the environmental and fiscal problems of that alternative, and present that to the public. Then, if the counselor still wants that alternative, he can go ahead, but the public will know the consequences. Of course, such a growth plan may run into problems in the review process.