

Congress of the United States
Washington, DC 20515

Ms. Christy Goldfuss
Managing Director
Council on Environmental Quality
730 Jackson Place NW
Washington, DC 20506

April 27, 2015

Dear Ms. Goldfuss,

We write to express our strong support for the Council on Environmental Quality's (CEQ) December 2014 draft guidance providing federal agencies direction on when and how to consider the effects of greenhouse gas (GHG) emissions and climate change in their evaluation of all proposed federal actions in accordance with the National Environmental Protection Act (NEPA).

Since the 1970's, NEPA has increased transparency and educated federal agencies, Congress, and the public about the environmental impacts of proposed federal actions. NEPA ensures that agencies analyze the environmental effects of federal actions before decisions are made, and provides decision makers with alternatives to mitigate these effects.

Climate change is a fundamental environmental issue, and the relation of federal actions to climate change falls squarely within NEPA's congressional intent. The concentration of CO₂ in the atmosphere has now surpassed 400 ppm. This is the highest atmospheric CO₂ concentration in at least 800,000 years. Among other effects, increased greenhouse gases in the atmosphere are causing global temperatures and sea levels to rise and are threatening many aspects of our society—from fisheries to agriculture and from human health to national security. In light of the broad environmental consequences of greenhouse gas emissions, it is appropriate that environmental evaluations required by NEPA should include consideration of the ways in which federal actions can exacerbate or be impacted by climate change.

Without imposing new requirements, the proposed guidance will help federal agencies comply with NEPA requirements consistently across agencies. It will not mandate a particular agency decision or compel agencies to limit greenhouse gas emissions, even for projects with high levels of greenhouse gas emissions. Instead, it will provide for better and more informed federal decisions regarding GHG emissions and the effects of climate change consistent with existing NEPA principles.

The guidance highlights the importance of comparing and disclosing potential GHG emissions from various project alternatives, and makes clear that projects with GHG emissions below 25,000 metric tons annual CO₂-e do not always warrant quantitative climate change analysis.

Furthermore, CEQ's NEPA guidance directs agencies to account for actions that may occur as a predicate to the agency action as well as a result of the agency action. We support CEQ's emphasis on the importance of considering reasonable mitigation measures to lower GHG emissions and appreciate the examples provided of mitigation options related to greenhouse gases.

Finally, in order to put the GHG emissions into context, we propose that CEQ direct agencies to consider calculating the climate change costs of a project using the social cost of carbon. The social cost of carbon is a scientifically-accepted method, developed by a dozen federal agencies and offices, for determining the costs of carbon pollution. The social cost of carbon provides a meaningful metric, beyond tons of CO₂ emissions, for understanding the impact of GHG emissions in monetary terms.

We look forward to working with CEQ to further develop and implement the NEPA guidance on when and how federal agencies should consider the effects of GHG emissions and climate change in accordance with their responsibilities under NEPA. As greenhouse gas concentrations in the atmosphere continue to rise, it is imperative that federal agencies show leadership and transparency in accounting for and reducing the emissions from their actions while also considering the impacts that climate change may have on a specific project. We will continue to push for comprehensive reforms in Congress to decrease emissions across the public and private sectors and support ongoing federal initiatives that clean-up our atmosphere.

Thank you for your leadership on this important matter. We look forward to the completion of the final NEPA guidance later this year.

Sincerely,


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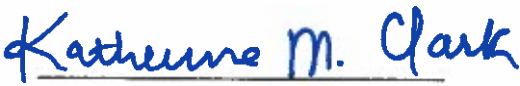

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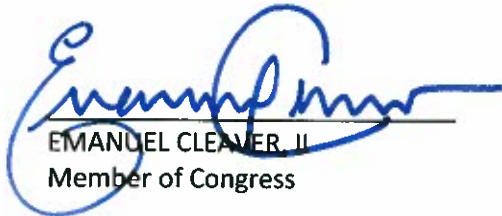

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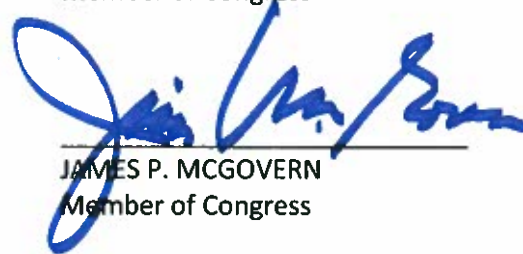
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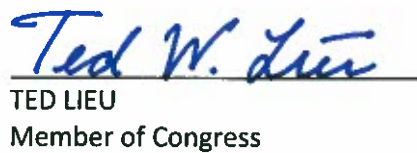
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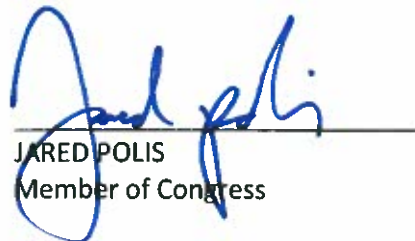
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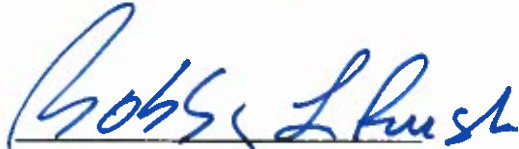
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