



May 24, 2010

TO: Nancy H. Sutley, Chair,
Council on Environmental Quality

FROM: Council of Western State Foresters

RE: Draft Guidelines for NEPA on Considering the Effects of Climate Change and Greenhouse Gas Emissions

The Council of Western State Foresters (CWSF) represents the combined interests of seventeen State Foresters and six Pacific Island Foresters in the Western United States. Thank you for the opportunity to provide feedback on the draft guidelines for NEPA on Considering the Effects of Climate Change and Greenhouse Gas Emissions.

We support the Council on Environmental Quality's (CEQ) proposal to proceed cautiously and more fully consider Federal land and resource management actions inclusion in the NEPA guidance. The scientific basis for analysis of alternatives is not yet fully developed and significant uncertainty about alternatives' effects remains. Requiring analysis that is based on significant uncertainty does not help inform decisions, and the protocols for these analyses are yet to be developed for agency use. It would be premature and unwise to create detailed guidance and requirements for considering effects of climate change and greenhouse gas emissions at this time.

We provide the following considerations for your development of future guidelines on these issues in relation to NEPA, climate change and greenhouse gas emissions for Federal land and resource management actions:

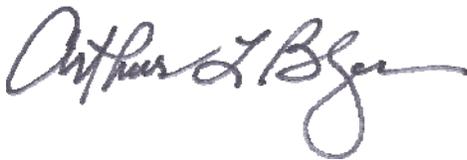
- 1) "No action" alternatives that result in no forest management treatments over a defined period of time will likely have climate change as a factor that causes environmental consequences and changes. Protocols should provide guidance on the appropriate time frame for analysis, and the GHG emission profile that is likely to occur over a realistic scenario of climate change impacts. It is also critical to have guidelines for considering uncertainty in the analysis. "No action" cannot be assumed to be no change in emissions over time because disturbances such as fire, insect and disease and changes in productivity may occur. Watershed, wildlife habitat and other resource values could also be influenced by "no action" under a changing climate scenario.
- 2) "Actions" that include removing vegetation, restoring fire, or other forest management options will need protocols that also specify the time frame for analysis. It will be

important to specify which emissions are linked to the land management agency, which to transporting and processing and/or bioenergy facilities, and which to the end use and disposal. One important area of uncertainty is in meeting the need to balance the analysis of emissions from resource management actions with offsetting sequestration, storage and emissions reduction over time that may also come from those actions.

- 3) Localizing climate change scenarios requires having better tools to predict and monitor effects of climate change that relate to the scale of “actions” or “no actions” so that over time there can be feedback on the accuracy of assumptions and analysis.
- 4) There needs to be more complete understanding of how biogenic carbon cycles will be affected by climate change. Scientific consensus on balancing land use change, alternative fates, and their associated life cycle emissions can be more accurately estimated and considered. These are active areas of scientific discovery and debate, and it is premature to codify these into NEPA guidelines.
- 5) NEPA analytical considerations of climate change effects should involve more than only considering greenhouse gas emissions. Social and economic factors will also need to be identified and discussed.
- 6) Until guidance is available on how to consider climate change and greenhouse gas emissions in NEPA for Federal land and resource management actions, there should be clear policy that this analysis is not required or expected.

We appreciate your consideration of our comments and will look forward to providing further assistance when CEQ addresses the Federal land and resource management actions in future guidance documents.

Sincerely,



Arthur, “Butch” Blazer, New Mexico State Forester

Council of Western State Foresters Chair