



# U.S. Climate Change and the National Environmental Policy Act (NEPA)

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**IAIA Special Symposium on Climate Change and Impact Assessment**  
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# National Environmental Policy Act (NEPA) of 1969

All agencies of the Federal Government shall include in every recommendation or report on proposals for legislation and other major federal actions **significantly** affecting the quality of the human environment , a detailed statement by the responsible official on the action's potential environmental impacts, adverse impacts that cannot be avoided, and alternatives to the proposed action.

# The “rules” you have to follow

- NEPA Statute
  - CEQ Implementing Regulations (40 CFR Parts 1500-1508)
  - Individual Agency NEPA Regulations
  - Case Law/Precedent
- 
- Other “guidance”

# Excuses Typically Given for Not Evaluating Global Climate Change in NEPA documents

- “...It is not required....”
- “...we scoped it out of our document....”
- “... its not foreseeable....”
- “....its too speculative....”
- “... we are only a small part of the problem...”
- “...we can’t solve the global problem so why discuss it...”
- “... why should we worry about polar bears when our project is in the desert?”
- “...my cat ate that section”

# CEQ Regulations Sec. 1502.16

## Environmental consequences

- (e) Energy requirements and conservation potential of various alternatives and mitigation measures
- (f) Natural or depletable resource requirements and conservation potential of various alternatives and mitigation measures
- (g) Urban quality, historic and cultural resources, and the design of the built environment, including the reuse and conservation potential of various alternatives and mitigation measures
- (h) Means to mitigate adverse environmental impacts (if not fully covered under Sec. 1502.14(f))

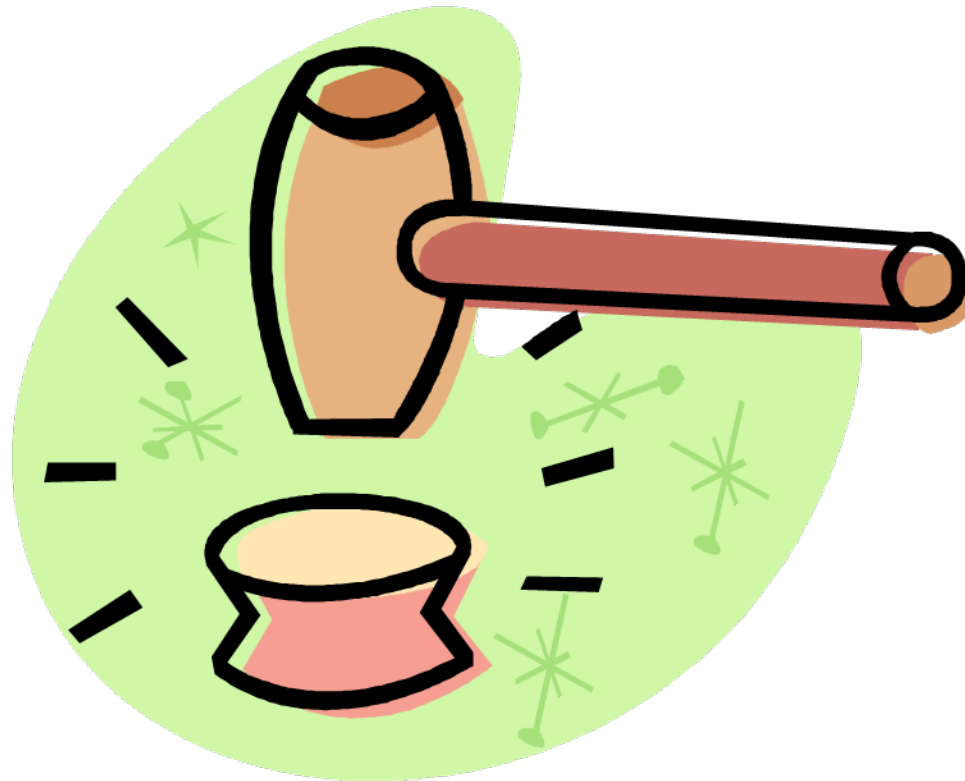
# Cumulative Impacts

- CEQ Regulations §1508.7:
  - *“Cumulative impact” is the impact on the environment which results from the incremental impact of the action being analyzed when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such actions. **Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.***

# The Changing “Climate” for Climate Change

- Increased media attention
- Increased legal activity
  - NEPA cases
  - Massachusetts v. EPA decision (April, 2007)
  - New CBD Climate Law Center (funded at \$17 million)
- ESA polar bear listing (May, 2008)
- Increased number of scientific studies
- New administration

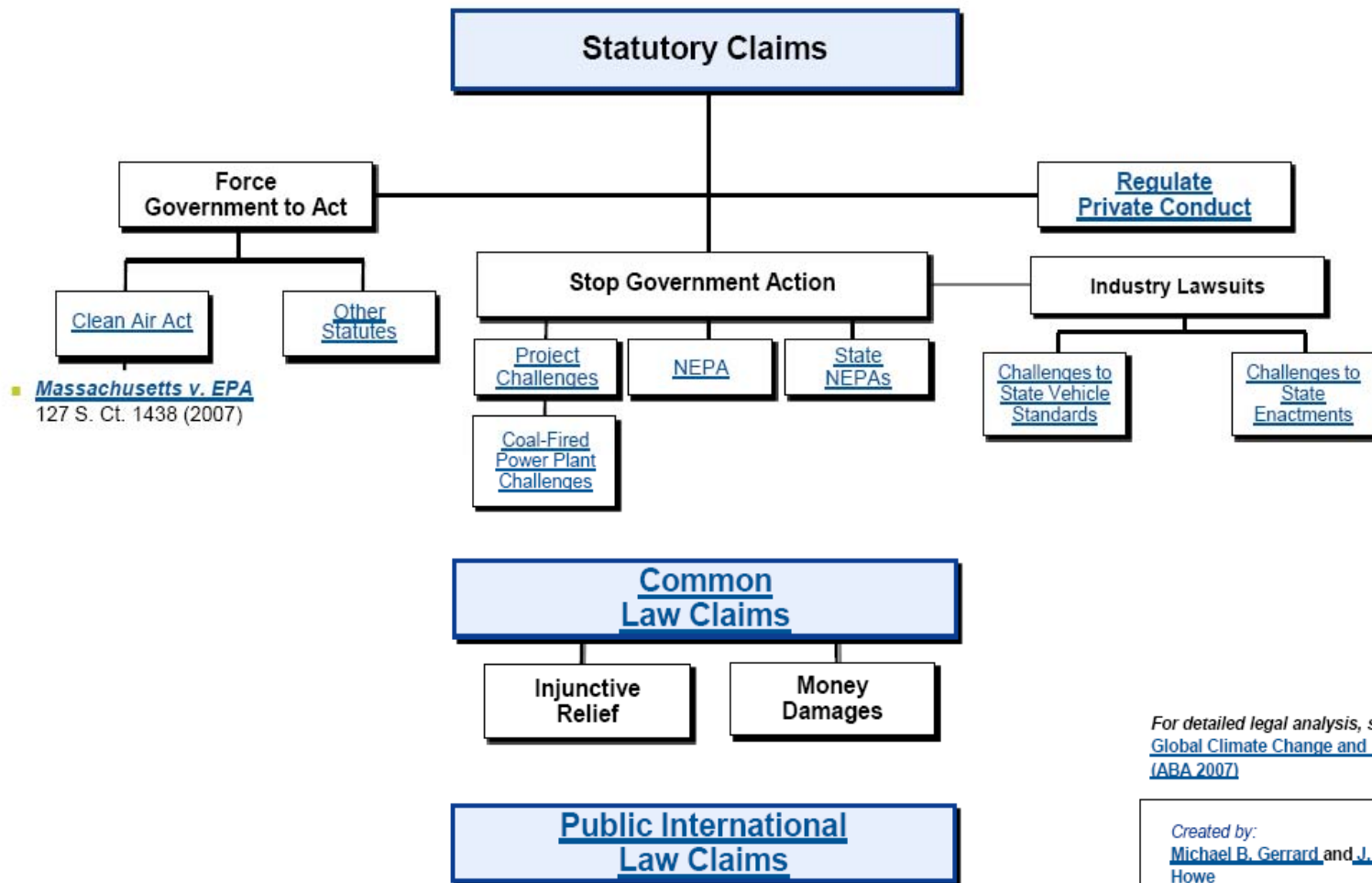
# NEPA Climate Change Litigation



URL: [www.climatecasechart.com](http://www.climatecasechart.com)

To receive email updates to this chart, send a request to [cullen.howe@aporter.com](mailto:cullen.howe@aporter.com)

# CLIMATE CHANGE LITIGATION IN THE U.S.



For detailed legal analysis, see [Global Climate Change and U.S. Law \(ABA 2007\)](#)

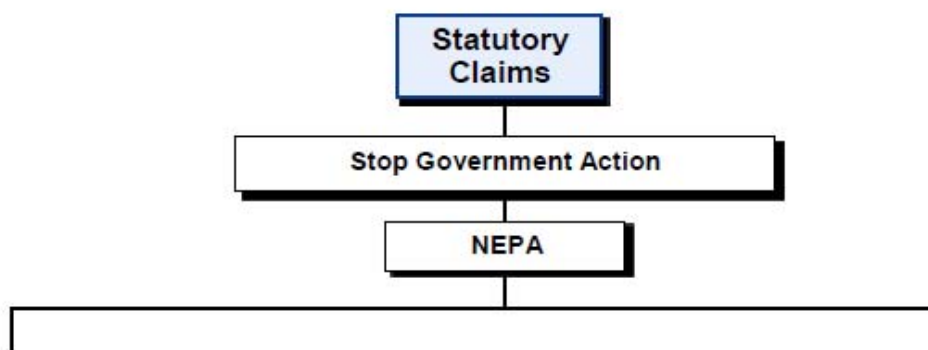
Created by: [Michael B. Gerrard](#) and [J. Cullen Howe](#)

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# www.climatecasechart.com

## CLIMATE CHANGE LITIGATION IN THE U.S.



- [City of Los Angeles v. NHTSA](#) (D.C. Cir. 1990)
- [Found. on Econ. Trends v. Watkins](#) (D.D.C. 1992)
- [Seattle Audubon Soc. v. Lyons](#) (W.D. Wash. 1994)
- [APAC, Inc. v. Bonneville Power Adm.](#) (9<sup>th</sup> Cir. 1997)
- [Council on Env. Quality Draft Memo on Climate Change](#) (Oct. 1997)
- [Border Power Plant Working Group v. Dept. of Energy](#) (S.D. Cal. 2003)
- [Mid States Coalition for Progress v. Surface Transportation Board](#) (8<sup>th</sup> Cir. 2003)
- [Senville v. Peters](#) (D. Vt. 2004) ±
- [Friends of the Earth v. Watson](#) (N.D. Cal. 2005) ±
- [National Audubon Society v. Kempthorne](#) (D. Alaska 2006) ±
- [NW Envtl. Advocates v. Nat'l Marine Fisheries Serv.](#) (9<sup>th</sup> Cir. 2006) ±
- [Mayo Found. v. Surface Transportation Board](#) (8<sup>th</sup> Cir. 2008)
- [Center for Bio. Diversity v. U.S. Dept. of Interior](#) (D.C. Cir., filed July 2007) ±
- [Friends of the Earth v. Moshbacher](#) (N.D. Cal. 2007). Interlocutory appeal denied (Sept. 2007) (settled Feb. 2009) (Ex-Im settlement) (QPIC settlement) ±
- [North Slope Borough v. Minerals Mgmt Service](#) (D. Alaska 2007) ±
- [Izaak Walton League of America v. Kimbell](#) (D. Minn. 2007)
- [Ranchers Cattlemen Action LF v. Connor](#) (D. S.D., filed Oct. 2007)
- [Audubon v. Department of Transportation](#) (D. Md. 2007)
- [Center for Bio. Diversity v. NHTSA](#) (9<sup>th</sup> Cir. 2007) ±
- [Petition to CEQ to Include Climate Change Analysis In Review Documents](#) (Feb. 2008)
- [Center for Bio. Diversity v. NHTSA](#) (9<sup>th</sup> Cir. 2008) ±
- [Hanner v. Tidwell](#) (D. Montana, Oct. 2008) ±
- [WildEarth Guardians v. Fish and Wildlife Serv.](#) (D. Col., filed Oct. 2008)
- [Montana Env. Info. Center v. BLM](#) (D. Mon., filed Dec. 2008) (settled March 2009) ±
- [Bravos v. BLM](#) (D. N.M. filed Jan. 2009) ±
- [Sierra Club v. Dept. of Interior](#) (D. Utah, filed Jan. 2009)
- [Sierra Club v. Two Elks Generation Partners](#) (D. Wyoming, filed Jan. 2009) ±
- [Center for Bio. Diversity v. Dept. of Interior](#) (D.C. Cir., April 2008) ±
- [Western Watersheds Project v. Salazar](#) (D. Idaho, May 2009) ±
- [The Wilderness Society v. Dept. of Interior](#) (N.D. Cal., filed July 2009) ±
- [WildEarth Guardians v. U.S. Forest Service](#) (10<sup>th</sup> Cir., July 2009) ±
- [North Slope Borough v. Minerals Mgmt Service](#) (9<sup>th</sup> Cir. Aug. 2009) ±
- [Sierra Club v. U.S. Dept. of State](#) (N.D. Cal., filed Sept. 2009) ±
- [Shenandoah Valley Network v. Capka](#) (W.D. Vir. Sept. 2009) ±
- [Sierra Club v. U.S. Dept. of State](#) (N.D. Cal., Sept. 2009) ±
- [NRDC v. U.S. State Dept.](#) (D.D.C. Sept. 2009) ±
- [Conservation Northwest v. Rey](#) (W.D. Wash. Dec. 2009) ±
- [In re Black Mesa Complex](#) (Dept. of Interior Jan. 2010)
- [Sierra Club v. Clinton](#) (D. Minn. Feb. 2010) ±
- [Amigos Bravos v. BLM](#) (D. N.M. Feb. 2010) ±
- [Sierra Club v. Clinton](#) (D. Minn. Feb. 2010) ±
- [NRDC v. U.S. Army Corps of Engineers](#) (N.D. Ohio March 2010) ±
- [WildEarth Guardians v. U.S. Forest Services](#) (D. Col. April 2010) ±
- [Western Watersheds Project v. U.S.F.S.](#) (D. Idaho May 2010) ±
- [NRDC v. BLM](#) (D.D.C., filed May 2010) ±
- [N.C. Alliance for Trans. Reform v. U.S. Dept. of Trans.](#) (M.D.N.C. May) 2010 ±
- [Sierra Club v. FHA](#) (S.D. Tex. May 2010) ±
- [Shenandoah Valley Network v. Capka](#) (W.D. Vir. June 2010)
- [Wildearth Guardians v. Salazar](#) (D.D.C., filed July 2010)

For detailed legal analysis, see [Global Climate Change and U.S. Law \(ABA 2007\)](#)

Click + after case name for description of case

Created by:  
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# NEPA Climate Change Case Law

- ***Center for Biological Diversity v. National Highway Traffic Safety Administration (9<sup>th</sup> Circuit)***
  - Plaintiffs allege that the agency ignored climate change impacts in their NEPA analysis (an EA) for setting new national gas-mileage standards for SUVs and light-duty trucks

# NEPA Climate Change Case Law

- GHG emissions and cumulative impact analyses were inadequate
  - Court: *The EA does not discuss the **actual** environmental effects resulting from those emissions or place those emissions in context of other CAFÉ rulemakings.*
  - *Thus, the fact that climate change is largely a global phenomenon that includes actions that are outside of the agency's control...does not release the agency from the duty of assessing the effects of its actions on global warming within the context of other actions that also affect global warming.*

# NEPA Climate Change Case Law

- **The impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impacts analysis that NEPA requires agencies to conduct. Any given rule setting a CAFÉ standard might have an “individually minor” effect on the environmental, but these rules are “collectively significant actions taking place over a period of time.**

# Massachusetts et al. v. EPA

- Supreme Court 5-4 decision in April, 2007
- The Court ruled that greenhouse gases are pollutants subject to regulation under the Clean Air Act and declared that EPA was in violation of the act for not considering their regulation
- They also ruled that the states had standing to challenge EPA because of the well-documented scientific evidence that they would be affected by the impacts of climate change

# Two Fundamental Aspects of Climate Change Impact Analysis



## Impacts on Climate Change

- **Basic question:** What is my project's GHG contribution?
- **Desired result:** To analyze GHG contribution and to discuss reducing the contribution to climate change by mitigating GHG emissions
- **Basic questions:** How would climate change affect my project? How would climate change affect resources affected by my project?
- **Desired results:** To adequately prepare a project/plan area for the inevitability of climate change (e.g. "adaptation"); adequately discuss climate change impacts to resources



## Impacts of Climate Change

# NRDC v. Kempthorne (E.D. CA – 2007)

- ESA Case – but important NEPA implications
- Court ruled USFWS Biological Opinion for CA state and federal water projects should have addressed global climate change effects on the hydrological system and the Delta smelt
- Use of historic hydrology data to forecast future impacts was inappropriate
- Similar court decision involving salmonids (*PCFAA v. Gutierrez* 2008)

- Draft 1997 CEQ Guidance Document, ***Guidance Regarding Consideration of Global Climatic Change in Environmental Documents Prepared Pursuant to the National Environmental Policy Act***

# 2008 “Formal Legal Petition” to CEQ on Climate Change & NEPA

- Submitted on Feb. 28, 2008
- Submitted by:
  - International Center for Technology Assessment
  - Natural Resources Defense Council
  - Sierra Club

Center for American Progress



## Full Disclosure

*An Executive Order to Require  
Consideration of Global Warming Under  
the National Environmental Policy Act*

Christopher Pyke and Kit Batten  
May 2008

[www.americanprogress.org](http://www.americanprogress.org)  
Progressive Ideas for a Strong, Just, and Free America

### PERSPECTIVES FROM THE FIELD

#### NEPA and Climate Change, Part 2: Ten Steps to Taking a Hard Look

Michael D. Smith, Ron Bass

This article is part 2 of a two-part series. Part one, which was published in the June 2008 edition of *Environmental Practice*,<sup>1</sup> focused on the context for considering climate change in National Environmental Policy Act (NEPA) analyses and reviewing the case law and other legal developments on the topic. The article briefly explained the phenomenon of climate change and the key climate change science findings and predictions from the most credible global and United States (US) sources. The article also briefly described some important state and local climate change policy initiatives, and provided an overview of the state of NEPA climate change case law.

This article expands on that discussion by focusing on emerging trends in climate change regulation and new approaches to NEPA analysis of climate change impacts and mitigation. It concludes with a practical step-by-step approach to ensuring that greenhouse gas (GHG) emissions and other climate change-related impacts receive appropriate consideration in NEPA documents.

NEPA requires federal agencies to take a hard look at the environmental consequences of their proposed actions; however, many agencies are preparing NEPA documents with little or no analysis of GHG emissions or the impacts of global climate change on either the proposed action or the resources affected by the action. As policy makers continue to debate how agencies should address GHG emissions and climate change impacts under NEPA, lead

agencies cannot afford to wait for answers. This article briefly explains why GHG/climate change impacts should be evaluated in most NEPA analyses and includes a recommended 10-step approach to the topic.

Every day, agencies are preparing NEPA documents with little or no official guidance about how to address GHG/climate change issues. Unfortunately, too many agencies are coming up with excuses for not addressing the issue at all or including only vague references to it. Here are some of the more common excuses:

- NEPA doesn't cover climate change impacts.
- NEPA only applies to impacts in the United States.
- Climate change impacts are speculative and not foreseeable.
- We scoped it out of our document.
- We can't solve the global problem so why discuss it.

Agencies relying on these excuses are in apparent denial that the NEPA statute and the Council on Environmental Quality (CEQ) regulations for implementing NEPA already contain provisions that strongly suggest the need to evaluate climate change-related impacts. They are also ignoring the emerging trends on this issue in the courts, in state legislatures, and within the Obama administration. For example, in a recent letter<sup>2</sup> sent from the chair of the CEQ to two senators on the Environment and Public Works Committee in response to their request for information on how the CEQ planned to address NEPA and climate change, CEQ Chair Nancy Sutley stated,

Nonetheless, NEPA compels Federal agencies to consider environmental effects before undertaking significant actions or policies. CEQ sees no basis for excluding greenhouse gas emissions from that consideration. CEQ believes that it is appropriate and necessary to con-

sider the impact of significant Federal actions on greenhouse gas emissions and the potential for climate change to affect Federal activities evaluated through NEPA and different approaches for managing those effects.

The letter also stated that CEQ was developing a guidance document on NEPA and climate change for federal agencies, and would be releasing a draft copy for public review. No timeline was given for the release of the draft document. However, there is no need or excuse for federal agencies to wait for such guidance to begin addressing the topic in their NEPA analyses. The next section describes relevant sections of the existing NEPA statute and CEQ NEPA implementing regulations that provide direction on addressing the topic.

#### Existing Framework under NEPA and CEQ Regulations

Language in the NEPA statute and the CEQ *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act*<sup>3</sup> strongly suggest that GHG emissions and climate change impacts should be addressed in most NEPA analyses. Consider the following:

- Effects on air quality fall under NEPA's definition under *Protection of the Environment, of Terminology and Index: Effects on the human environment* (40 CFR 1508.8): "Effects includes . . . ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative"—and *Human Environment* (1508.14): "Human environment shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment."

# Draft CEQ Guidance on the Consideration of Greenhouse Gases & Climate Change (Feb. 18, 2010)

- Explains how Federal agencies should analyze the environmental impacts of greenhouse gas emissions and climate change when they describe the environmental impacts of a proposed action under NEPA.
- Provides practical tools for agency reporting, including a presumptive threshold of 25,000 metric tons of carbon dioxide equivalent emissions from the proposed action to trigger a quantitative analysis
- Instructs agencies how to assess the effects of climate change on the proposed action, and, in turn, on the design of agency actions.

- In scoping, Federal agencies should whether analysis of the direct and indirect GHG emissions from their proposed actions would provide meaningful information to the decision maker and public
- Consider quantitative and qualitative assessment of direct emissions of 25,000 metric tons CO<sub>2</sub>-equivalent GHG emissions annually
- Consider similar analysis for long-term actions that emit less than 25,000 metric tons CO<sub>2</sub>-equivalent GHG emissions annually
- Does not provide guidance for land management activities

# Accept it will change over time...

- CEQ Feb. 18, 2010 Draft Guidance:
  - “NEPA analysis of climate change issues necessarily will evolve to reflect the scientific information available and the legal and policy context of decisions that the NEPA process is intended to inform. Therefore, once this guidance is issued in final form, CEQ intends to revise it as warranted to reflect developments in the law, policy, and science regarding climate change.”

# CEQ, OSTP, NOAA Climate Change Adaptation Task Force Report (October 14, 2010)

- **Make adaptation a standard part of Agency planning**
- **Ensure that scientific information about the impacts of climate change is easily accessible so public and private sector decision-makers can build adaptive capacity into their plans and activities.**
- **Align Federal efforts to respond to climate impacts that cut across jurisdictions and missions, such as those that threaten water resources, public health, oceans and coasts, and communities.**

# CEQ, OSTP, NOAA Climate Change Adaptation Task Force Report (October 14, 2010)

- **Develop a U.S. strategy to support international adaptation that leverages resources across the Federal Government to help developing countries reduce their vulnerability to climate change.**
- **Build strong partnerships to support local, state, and tribal decision makers in improving management of places and infrastructure most likely to be affected by climate change.**

# Presidential Executive Order 13514 - "Federal Leadership in Environmental, Energy, and Economic Performance" (October 5, 2009)

- Sets forth goals in the following areas:
  - Report and reduce greenhouse gas emissions
  - Improve water use efficiency and management
  - Promote pollution prevention and eliminate waste
  - Advance regional and local integrated planning
  - Implement sustainable Federal buildings
  - Advance sustainable acquisition
  - Promote electronics stewardship
  - Sustain environmental management

# Advance regional & local integrated planning

- Participate in regional transportation planning and recognize existing community infrastructure
- Align federal policies to increase effectiveness of local planning for energy choices
- Ensure planning of new facilities and leases are transit oriented or, in rural communities, emphasize existing or planned town centers
- **Identify and analyze impacts from energy usage and alternatives in all EISs and EAs for proposed new or expanded facilities**
- Coordinate with regional programs for all levels of ecosystem, watershed, and environmental management programs

# Agency NEPA Climate Change Guidance Documents

- **U.S. Dept. of Interior (DOI)** Secretarial Orders 3226 and 3289
- **U.S. Forest Service (USFS)** – “Climate Change Considerations in Project Level NEPA Analysis”
- **U.S. Federal Highway Administration (FHWA)** – “Climate Change – Model Language in Transportation Plans”

# EIS Case Studies

# EIS for MY 2012-2016 CAFE Standards (U.S. DOT-NHTSA, 2010)



# Timeline

- MY 2011-2015 FEIS – Oct. 2008
- Jan. 7, 2009 – Bush Administration Memo
- Jan. 26, 2009 – Obama Administration Memo
- President Obama announces new “National Program” combining the CAFE Regulations and EPA CAA regulation of GHG emissions from passenger vehicles on May 19, 2009
- New standard will be 35.5 mpg combined for cars and light trucks in 2016

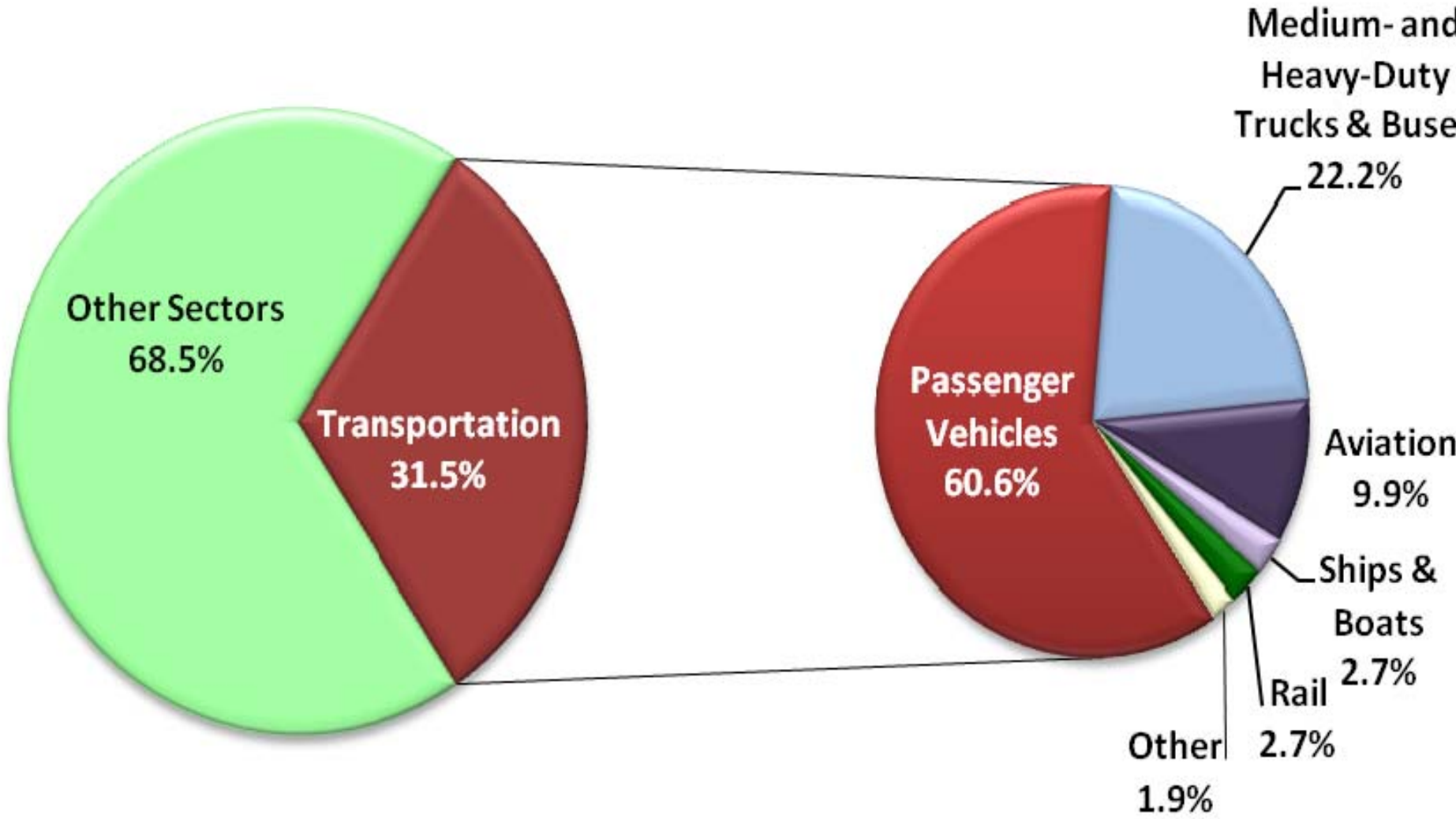


Image Source: Alex Wong/Getty, <http://green.autoblog.com>, 2009

# Background

- EIS covers rulemaking for 2012-2016 standards
  - Baseline mpg: **28.1**; FEIS Preferred alternative: **34.1**
  - Major resources analyzed: (1) climate change; (2) air quality; (3) energy resources

# U.S. Transportation Sector's Contribution to U.S. Greenhouse Gas Emissions



Source: Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2007.

# GHG Emissions



## Effects from Emissions

(CO<sub>2</sub> concentration Temperature, Precipitation,  
Sea Level)

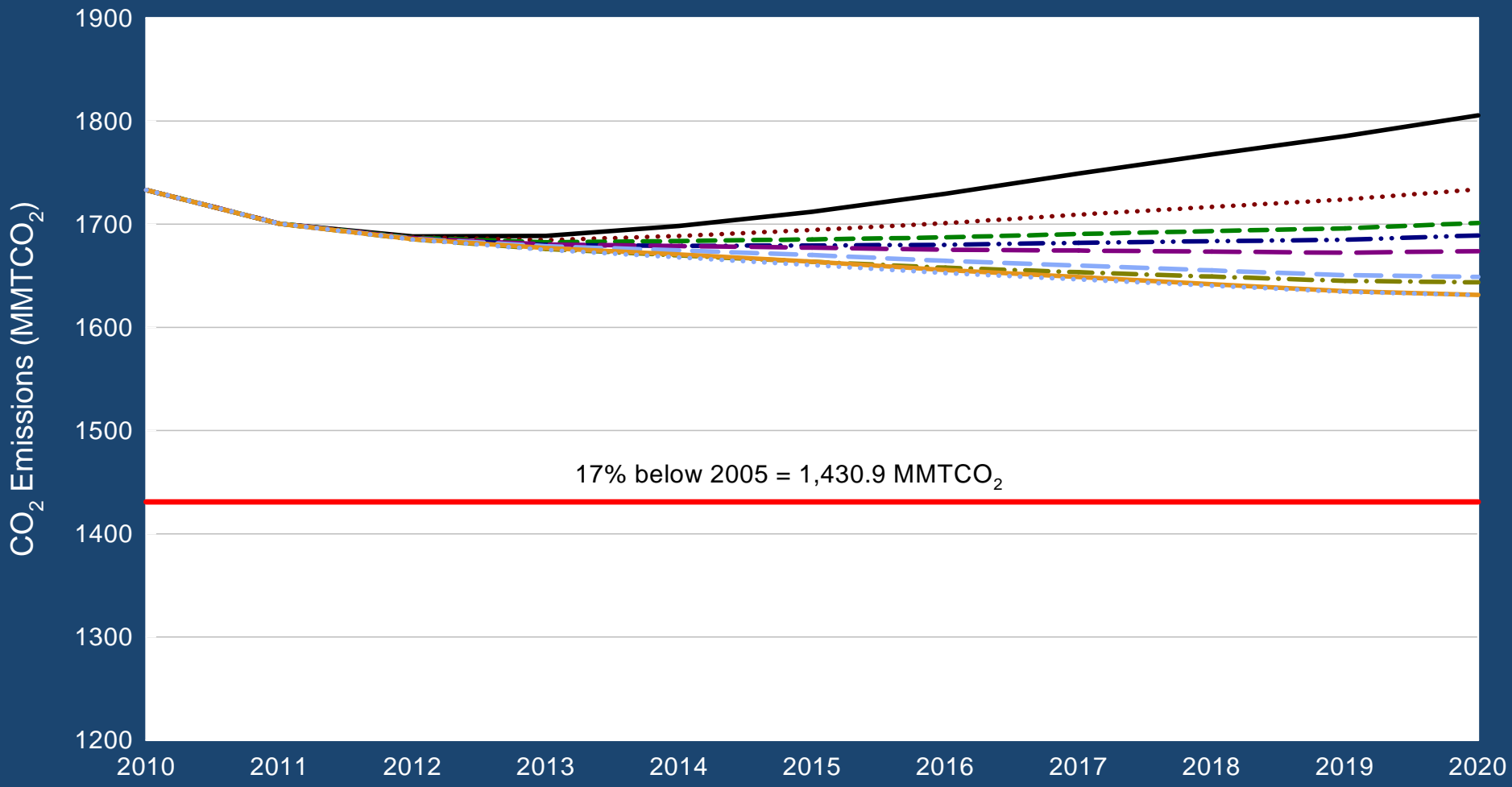


## Resource Impacts

(Biophysical, Social, Cultural, EJ)

# MAGICC 5.3

- Described as a Simple Climate Model (SCM) by the IPCC Publicly available and used extensively in the literature and by the UN IPCC in AR4
- MAGICC is an integrated suite of climate, gas-cycle, and ice-melt models



- Alt. 1: No Action
- ..... Alt. 2: 3%/year increase
- - - Alt. 3: 4%/year increase
- · - · - Alt. 4: ~4.3%/year increase, Preferred
- - - Alt. 5: 5%/year increase
- · - · - Alt. 6: ~6.0%/year increase, MNB
- - - Alt. 7: 6%/year increase
- - - Alt. 8: 7%/year increase
- · - · - Alt. 9: ~6.6%/year increase, TCTB

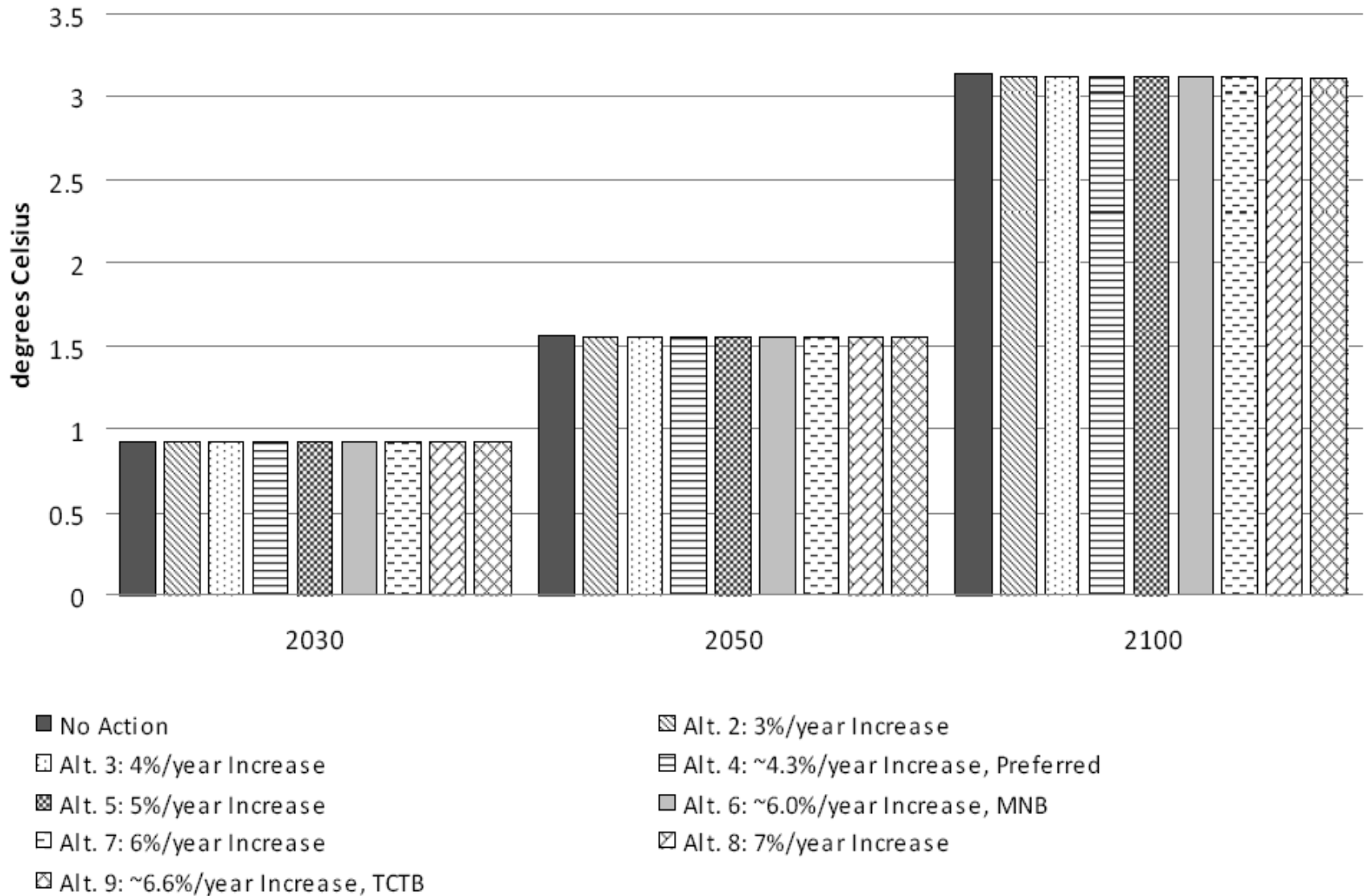
Source: U.S. Department of Transportation. "Summary, Final Environmental Impact Statement, Corporate Average Fuel Economy Standards, Passenger Cars and Light Trucks, Model Years 2012-2016." February, 2010.

# Climate Change Consequences (in the year 2100)

	<b>CO<sub>2</sub> Concentration (ppm)</b>	<b>Temperature increase (degree C)</b>	<b>Sea Level Rise (cm)</b>
<b>No Action</b>	<b>783.0</b>	<b>3.136</b>	<b>38.0</b>
<b>Preferred Alternative</b>	<b>779.9</b>	<b>3.124</b>	<b>37.9</b>

Source: U.S. Department of Transportation. "Final Environmental Impact Statement, Corporate Average Fuel Economy Standards, Passenger Cars and Light Trucks, Model Years 2012-2016." February, 2010.

Figure 3.4.4-8. Global Mean Surface Temperature Increase (°C)



Source: U.S. Department of Transportation. "Final Environmental Impact Statement, Corporate Average Fuel Economy Standards, Passenger Cars and Light Trucks, Model Years 2012-2016." February, 2010.

# Climate Change Consequences

- Mostly qualitative analyses of:
  - Freshwater resources; Ecosystems; Coastal systems; Human health; Environmental justice; Food, fiber, and forests; Industries, settlements, and society; Non-climate impacts of CO<sub>2</sub>

- To find a PDF of the EIS:
  - <http://www.nhtsa.gov/fuel-economy>



Heavy-Duty Fuel Efficiency  
Improvement Program

# Draft Environmental Impact Statement

October 2010



# I-5 Columbia River Crossing DEIS



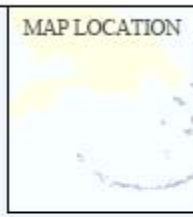
# The I-5 Bridge over the Columbia River

- 2 side-by-side bridges
- Northbound built in 1917, southbound built in 1958
- No shoulders
- The only red light on I-5 from Canada to Mexico



# Environmental Consequences

- Highway-related GHG emissions
  - Every future alternative higher than existing conditions
  - Every Build alternative lower than No-Build
  - Relatively small differences among build alternatives
  - Congestion makes a meaningful difference
  - Toll and HCT make a difference
- Transit GHG emissions varied substantially
  - LRT lower than BRT (but depends on electric power source)
  - Highest Emissions from combination of double transit operations, higher toll, less highway



- Warmer temperatures could also result in increased insect abundance and periods of activity (NRC 2003), which could reduce caribou productivity. Alternatively, predicted weather patterns may result in changes to predominant wind direction and increasing wind strength, thus suppressing insect flight. Changes in weather patterns could alter caribou movements and distribution. Calving grounds could shift in response to changes in vegetation. Insect-relief habitat could become increasingly important, because of increased insect abundance and activity. Coastal erosion and the inundation of low-lying areas along the coast due to increases in sea level may alter the availability and extent of insect-relief areas and may cause shifts in the usage of particular areas. Over time, areas that are currently closed to leasing could become less important to caribou, while areas that are open to leasing could become more important.

- The only certainty with climate change is the uncertainty regarding just what will eventually occur. Predictions generally suggest that future conditions on the North Slope will be less favorable to arctic adapted species, such as muskoxen, caribou and arctic fox, and perhaps more favorable to boreal adapted species such as moose and red fox. The effects of climate change on mammal populations could in many cases be additive to those effects of oil and gas exploration and development. Any change, positive or negative, may impact terrestrial mammal species. While one species may benefit, another may be secondarily impacted, e.g. an increase in population of a predator may result in additional predation on a prey species.

1 2	Project type	Agency	State	Title	Final EIS (pgs.)	Draft EIS (pgs.)	Additional EIS (pgs.)	Impacts Analyzed					Description		
								1	2	3	4	5			
3	Agriculture	USFS	OR	<a href="#">Westside Rangeland Analysis Project, Proposal to Allocate Forage for Commercial Livestock Grazing on Six Alternatives, Mud and Toppe Creeks, Willowa Valley Ranger District, Willowa National Forest, Willowa County, OR</a>	<a href="#">25-9, 113</a>								X	This proposal provides a general qualitative description of the project, including an analysis of the project's impacts on invasive plant species and a discussion of grazing land absorptions.	
4	Agriculture	USFS	NV	<a href="#">Jarvis Ranger District Rangeland Management Project, Proposed Reauthorizing Grazing on 21 Existing Grazing Allotments, Humboldt-Toiyabe National Forest, Elko County, NV</a>	<a href="#">108, 130-1</a>									X	This report considers the impact of climate change on the project.
5	Agriculture	USFS	OR	<a href="#">Big Summit Allotment Management Plan, Proposed to Reauthorize Cattle Term Grazing Permits Construct Range Improvements, and Restore Riparian Vegetation on Five Allotments, Lookout Mountain Ranger District, Croco National Forest, Croco County, OR</a>	<a href="#">145-8, 186-7</a>									X	This report contains a general qualitative description of the project, including an analysis of the project's impacts on invasive plant species and a discussion of grazing land absorptions.
6	Buildings and real estate	ISACF	CA	<a href="#">Newhall Ranch Resource Management and Development Plan (RMDP) and the Spineflower Conservation Plan (SCP) Implementation, Portion of Santa Clara River Valley, Los Angeles County, CA</a>		<a href="#">276-279</a>	<a href="#">All</a>	X	X	X	X				This report projects GHG emissions from the removal of existing structures, indirect construction of bridges and other structures, indirect residential and commercial buildings, vehicle trips for residents, municipal operations, a golf course's operations, as well as additional carbon sequestration planted during build-out and mitigation proposals.
7	Buildings and real estate	FRBSF	WA	<a href="#">Federal Reserve Bank of San Francisco, Proposal to sell the Property at 1015 Second Avenue that is Eligible for Listing on the National Register of Historic Places, located in Seattle, WA</a>		<a href="#">113-122, 300-308</a>								X	This proposal calculates embodied emissions, energy emissions, and lifespan emissions for the proposed project.
8	Buildings and real estate	USFWS	AK	<a href="#">Yukon Flats National Wildlife Refuge Project, Proposed Federal and Public Land Exchange, Right-of-Way Grant, Anchorage, AK</a>	<a href="#">244-5</a>									X	This report qualitatively considers a few climate change impacts including establishment of an active fire regime and species.
9	Buildings and real estate	NPS	CA	<a href="#">Yosemite National Park Project, Construction of Yosemite Institute Environment Education Campus, Implementation, Mariposa County, CA</a>	<a href="#">293-5</a>			X		X	X	X			This report compares in general terms the different construction requirements of the different alternatives. It also notes that the effects of climate change on the project's facilities.
10	Buildings and real estate	ISACF	CA	<a href="#">San Pedro Waterfront Project, Proposed Specific Development Project and Associated Infrastructure Improvements on Approximately 400 Acres, Currently Operated by Los Angeles Harbor Department (LAHD), Located along the West Side of Los Angeles Harbor's Main Channel, from the Vincent Thomas Bridge to Cabrillo Beach, US Army Section 10 and 424 and Section 103 Marine Protection, Research, and Sanctuaries Act Permits, (MPRSA) City of Los Angeles, CA</a>	<a href="#">70-92</a>	<a href="#">14-19, 138-149</a>			X	X	X	X			This proposal's Final EIS corrects earlier tables. The emissions from purchased electricity, induced vehicle trips, and other impacts for the different alternatives and considers the impact of sea level rise from projected the port to withstand severe storms.
11	Buildings and real estate	GSA	CA	<a href="#">San Ysidro Land Port of Entry (LPDE) Improvement Project, Propose the Configuration and Expansion of the Existing (LPDE), San Ysidro, CA</a>	<a href="#">17-20</a>				X	X					This report lists the project's expected emissions of energy and vehicle energy use.
12	Buildings and real estate	USACE	CA	<a href="#">University of California (UC) Merced Campus and University Community Project, Development of a Major Research University, To Allow for the Discharge of Fill Material into 76.7 Acres of Wetlands, US Army COE Section 404 Permit, Merced County, CA</a>	<a href="#">389-91</a>			X	X	X	X				This report lists the GHG emissions that will result from the project, including direct GHG emissions, operational sources, electrical generation, water supply, wastewater emissions.
13	Coal Mining	BLM	WY	<a href="#">South Gillette Area Coal Lease Applications, WYW172635, WYW173360, WYW172657, WYW161248, Proposal to Lease Four Tracts of Federal Coal Reserves, Belle Ayr, Coal Creek, Caballo, and Cordero Rojo Mines, Wyoming Powder River Basin, Campbell County, WY</a>	<a href="#">447-50</a>			X	X	X					This report lists total GHG emissions expected from mining operations from the proposed coal mine.
14	Electric generating - fossil	DOE	SD	<a href="#">Deer Creek Station Energy Facility Project, Proposed 300-megawatt (MW) Natural Gas-Fired Generation Facility, Brookings County, SD</a>	<a href="#">22-3</a>	<a href="#">6-7, 85</a>		X						X	This proposal's Final EIS estimates emissions in detail and compares the combined cycle turbine's emissions to a subcritical pulverized coal boiler. The Draft EIS estimates normal operation of the 300-MW power plant, boiler components (combustion turbine, HRSG and duct burner, and diesel fire pump). It also discusses projected emissions from the region.
				<a href="#">Kemper County Integrated Coalfields Combined Cycle (KCC) Project</a>											This proposal details direct emissions from power plant.

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