

## **Interim Guidance for Greenhouse Gases and Climate Change in NEPA Reviews**

On March 28, 2017, President Trump signed Executive Order (EO) 13783, *Promoting Energy Independence and Economic Growth*, rescinding the Council on Environmental Quality (CEQ) *Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews*. This interim guidance is provided for perform air quality analysis of climate change and greenhouse gases (GHGs) National Environmental Policy Act (NEPA) assessments and documentation while awaiting further guidance from HQ USAF and OSD.

EO 13783 (published March 31, 2017) directed the rescission of the August 2016 CEQ climate change and GHG guidance. On 5 Apr 2017 CEQ complied with this directive (82 Fed Reg. 16576), resulting in removing the requirement for evaluating the effects of climate change on a proposed action and the environment. However, the EO did not remove the requirement for assessing the proposed action's potential impact to air quality (include greenhouse gasses) which is still mandated under NEPA. Therefore, all air quality NEPA assessments must include:

1. GHG Emissions Assessments. GHGs shall be treated like any other air pollutant under the air quality Environmental Impact Analysis Process (EIAP). GHG emissions estimates are required using the Air Conformity Applicability Model (ACAM) .
2. Significance Indication Analysis: "Significance Indication Analysis" as described in Section 6.3.1 of the *Air Force Air Quality Environmental Impact Analysis Process (EIAP) Guide - Fundamentals, Volume 1 of 2 (Air Quality EIAP Guide, August 2016)*.
3. CEQ Guidance Discussion: As a result of EO 13783 and the action of CEQ on 5 April, the August 2016 CEQ guidance should no longer be referenced as authority for any portions of an EIAP document. From an air quality point of view, evaluating "Effects of Climate Change on a Proposed Action & Environment" per section 6.3.4 of the Air Quality EIAP Guide is not required. However, the effects of Climate Change on a proposed action and/or the environment (per section 6.3.4 of the *Air Quality EIAP Guide*) should be included to address and document an informed decision-making process was followed. Additionally, while guidance is pending from higher headquarters, for proposed actions located in areas that may be vulnerable to climate change impacts (e.g.-low lying coastal areas) should include a brief analysis of potential impacts, consistent with the *Air Quality EIAP Guide*.

NOTE: A copy of the *Air Quality EIAP Guide* may be obtained at the AFCEC air quality eDash website or also available at <http://www.aqhelp.com/AQdocs.html>.