



May 24, 2010

Mr. Ted Boling  
The Council on Environmental Quality  
722 Jackson Place, N.W.  
Washington DC 20503

[GCC.guidance@ceq.eop.gov](mailto:GCC.guidance@ceq.eop.gov)

Re: Comments of the American Forest Resource Council on the Council on Environmental Quality's "Draft NEPA Guidance on Consideration of the Effects of Climate Change and greenhouse Gas Emissions"

Dear Council on Environmental Quality and Mr. Boling:

The American Forest Resource Council (AFRC) is pleased to submit these comments to the Council on Environmental Quality (CEQ) on its "Draft NEPA Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions," (Draft Guidance) dated February 18, 2010. CEQ made the Draft Guidance available and invited comment by May 24, 2010. See NOA, 75 Fed. Reg. 9046 (February 23, 2010).

AFRC represents nearly 80 forest product businesses and forest landowners in twelve western states. Our mission is to create a favorable operating environment for the forest products industry, ensure a reliable timber supply from public and private lands, and promote sustainable management of forests by improving federal laws, regulations, policies and decisions that determine or influence the management of all lands. Our members utilize timber grown on federal timber land in their manufacturing operations. Their operations are directly and indirectly impacted by implementation of the National Environmental Policy Act (NEPA).

AFRC endorses and incorporates by reference the comments of the American Forest and Paper Association dated May 24, 2010.

AFRC's comments are specifically directed to the role of federal agency implementation of NEPA requirements on federal forest lands managed by the Department of Agriculture Forest Service and the Department of Interior Bureau of Land Management.

The Draft Guidance explicitly is not applicable to Federal land and resource management actions. We believe this is appropriate because it is not currently possible to accurately screen land and management resource actions, particularly those involving the forested environment, to determine the likely effects of these actions on atmospheric conditions. Because land use actions

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are, by their nature, diffuse and unconfined, estimating their impacts on greenhouse gas (GHG) emissions is not possible using currently available evaluation methodologies. Attempts to do so would inevitably lead to agency actions that are arbitrary and capricious within the meaning of the Administrative Procedures Act, as interpreted by the courts.

The Draft Guidance concentrates on identifying detrimental effects of proposed agency action. Many federal forest land management projects have beneficial net effects on the atmosphere and, potentially, mitigating effects on climate change, to the extent that climate change is viewed as an adverse effect. Forest management activities in areas that improve the fire prone condition of the area subject to catastrophic wildfire prevent the release into the atmosphere of significant amounts of GHG's. When removed timber is converted to building products, carbon continues to be sequestered for additional decades while the reforested area continues to remove carbon from the atmosphere and capture it both above and below ground. The portion of the woody material that is placed in landfills also continues to be sequestered for many decades. Moreover, life cycle analysis reveals that the use of wood products to displace building materials that are more energy intensive to manufacture, such as steel and concrete, results in additional net benefits to the atmosphere. Woody material used for "green energy" further benefits the environment. All of these effects are both difficult to quantify and outside the normal range of NEPA analysis.

AFRC urges CEQ to avoid issuing NEPA guidance which would lead federal land management agencies to engage in arbitrary and capricious actions due to the impracticality and impossibility of accurate and consistent analysis of the impacts of land and resource management actions on GHG's and global warming.

We appreciate the opportunity to comment.

Very truly yours,

A handwritten signature in blue ink that reads "Tom Partin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Tom Partin  
President