

Addressing the New CEQ Guidance on Climate Change

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On December 18, 2014 the Council on Environmental Quality (CEQ) released draft guidance requiring U.S. Federal agencies to consider climate change in the evaluation of proposed Federal actions as part of the NEPA process. The comment period closes on March 25, 2015. The guidance provides clarification on what constitutes an adequate analysis of climate change for NEPA purposes. It specifies that an evaluation of how climate change will impact the proposed project should be conducted. The new guidance also anticipates an analysis of how climate change will affect the environmental consequences from the project as part of a cumulative impacts analysis on the environment. Failure to address the new CEQ guidance by new railroad projects could result in legal challenges to Environmental Impact Statements and lead to project delays or worse. Analysis addressing all three of these elements has not been typical in environmental assessments, but ICF has developed and implemented an approach, used both nationally and internationally, that meets CEQ's requirements. Examples include an EIS on a railroad conducted in 2015 and several rail, road and infrastructure projects in Asia, conducted in support of USAID's Asia Regional Environmental Field Support program. For each, ICF developed a methodology to assess climate related concerns and systematically evaluated the direct climate change impacts on the project, and the cumulative impacts of climate change and the project on environmental resources. This session will report on recent regulatory developments to assess climate change impacts on infrastructure including the CEQ guidance. It will also discuss ways of meeting the requirements and provide examples how this analysis was conducted on major infrastructure investments.