



March 25, 2015

Mr. Horst Greczmiel
Associate Director for NEPA Oversight
Council on Environmental Quality
722 Jackson Place, NW
Washington, D.C. 20503

Re: Revised Draft Guidance for Federal Departments and Agencies Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in NEPA Reviews, 79 Fed. Reg. 77,802 (December 24, 2014)

Dear Mr. Greczmiel:

Associated Governments of Northwest Colorado (AGNC) is made up of local governments representing the five counties in northwest Colorado, Garfield, Mesa, Moffat, Rio Blanco and Routt; our members have serious concerns related to the Revised Draft Guidance for Federal Departments and Agencies Consideration of Greenhouse Gas Emissions and the Effect of Climate Change in NEPA Reviews. We request that CEQ withdraw the Revised Draft Guidance as it appears to expand the scope of NEPA analyses and significantly alters current statutory and regulatory obligations of the NEPA process.

Our counties are home to a significant expanse of public lands and, given that fact, our economies are inextricably tied to those lands. The NEPA process has become a cumbersome and unwieldy process over the years and adding the components outlined in the Draft Guidance appears to be inconsistent with NEPA and CEQ regulations which we believe will expand the scope of NEPA analyses, worsening the already flawed process. We also question the appropriateness of NEPA analysis expansion without direct input from Congress.

It is a grave concern that under the Draft Guidance, a one-size-fits-all approach regarding Greenhouse Gas (GHG) emissions is inappropriately used. Over the years, it has been shown time after time that a one-size-fits-all approach to most any regulatory matter results in failure to consider local concerns and issues as well as many diverse NEPA scenarios. Further, establishing this type of guideline tends to result in federal agencies applying the "guideline" as a legal obligation which is troubling, as mitigation for climate change impacts in most of these instances are too minute to be measured. Thus, our concern is that permits and other land use authorizations will be issued *without consideration for the economic impacts to our communities* and the GHG guidelines *will do nothing to measurably impact issues related to climate change*.

The NEPA mandate to federal agencies is essentially procedural, but these guidelines may change NEPA from a procedural statute to a more substantive statute without direction from Congress, the oversight institution for changes of this sort.

AGNC appreciates the opportunity to share comments with the CEQ regarding the Revised Draft Guidance. Our counties and communities have worked through numerous NEPA processes with industry, federal management agencies and stakeholders over the past decades and find reasons for serious concerns with the Revised Draft Guidelines. We share the concerns provided in the comments provided in the Association letter CEQ has received as a part of this comment process that the guidelines are, "...inconsistent with NEPA, its implementing regulations and established case law and should be withdrawn." We request that our counties and communities continue to be apprised of the discussion regarding these guidelines.

Sincerely,

A handwritten signature in black ink that reads "Mike Samson". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Mike Samson
Chairman, AGNC
Garfield County

A handwritten signature in blue ink that reads "Jeff Eskelson". The signature is stylized and cursive, with a prominent vertical stroke on the right side.

Jeff Eskelson
Vice Chairman, AGNC
Rio Blanco County