

CC-7.3 Comments
Recommendation 58
Require evaluation of GHG emissions in environmental studies

The economic impacts of any legislation must be determined and be a part of the decision.

Follow federal requirements. Don't go off on a tangent that will not allow Montanans to compete against other state's citizens.

ONLY if it cannot be used as the basis for law suits.

There should be a cost/benefit analysis required. The benefits do not justify the costs using sound science. More taxes, regulations and red tape is not what will help Montana.

Definitely, although the cumulative impacts portion of Environmental Studies is generally poorly defined and completed. Additional work is required in state law (MEPA) to make up for lack of specificity in NEPA.

MEPA should be changed so that analyses conducted can be used as a basis for state actions such as permitting.

Environmental Impact Statements are already the most tax-burdensome undertakings that completely overshadow the potential project and end up costing more than the project in some cases with little or no public benefit

Perhaps on the state level agencies like MDT might be able to incorporate this evaluation into their EA's but frankly I don't see engineering firms that write EA's for major subdivisions able to do this very well. I also am not sure of local government officials current ability to evaluate this information when it's included in an EA without some training.

I live in a community where a coal plant is being proposed with NO requirement for GHG assessment as part of the EIS.

Yes. For example, does the Fish, Wildlife and Parks consider GHG in use of our state lands and resources. Letting ORV run at will is a hugh GHG contributor.

I believe this is already required under MEPA. The legislature does not have to change MEPA to make this happen. The State agencies should, and some do, already consider this issue when analyzing impacts.

Green House Gases are not causing the present climate change. Please encourage responsible study and education of cliamte change issues.

Why? To prevent development of Montana's resources. That would be the inevitable outcome without a level playing field (across stae boundaries). Let the feds lead here. Is anyone wondering why ND & WY are seeing development of clean coal projects and MT is not? Look no further than the folks appointed by the governor to CCAC.

Another reason to produce a lawsuit.

I assume we already have to report GHG emissions anyway, to meet constitutional requirement of health and safety, so doesn't seem a whole lot of effort will be required to include it in EAs.

Go ahead and lock up the natural resources in Montana. Our economy is already suffering and you want to handcuff it more.

Then we'll really see how little work ever gets beyond the bench of District Courts!

However, I do not support large-scale industrial-style corporate wind farms and their accompanying transmission lines! Small distributed alternative energy systems, especially rooftop solar, have less impact on landscapes and provide plenty of jobs!

This is an excellent idea, especially if combined with binding emission targets.

No technology - why measure what you can't change - you may as well stand on the beach and holler at the tide not to come in.

Individuals can only do so much with this issue, we need strong and numerous government action of many forms and formats...

Yes, we need awareness, and prevention.

This is a sure way to make sure that no development ever occurs in Montana again. I can just see the MEIC allegation that the GHG analysis in the EIS was inadequate. Sorry, project developer-start over!

Look to the UN-intended consequences. Let the market do its job. Like most government involvement in an issue, it is well intentioned, but will ultimately make the situation more cumbersome and expensive.

Since any NEPA document or the like just picks the preferred alternative anyway, I think this is just a way to pay more to consultants. This is only effective if there are teeth to the evaluation - like a GHG version of ESA.

Yes, indeed.

yes!

Also require federal studies to do the same when using state resources, includes consulting with state agencies.

The more we know the better we can screw it up and get it wrong. win, win Hooray for today to hell with tomorrow?

One more requirement on Montana businesses that puts us at a competitive disadvantage.

You have to start somewhere.

no longer can we ignore these

Yes, information could encourage look at long term cost of projects and thus energy conservation.

Just another tool for some folks to shut down industry in Montana - they apparently have enough already.

Is this possible to do accurately?

NO.

THIS WOULD BE EXCELLENT PRIOR TO ANY SPRAYING OF PESTICIDES. THE IMPACT STATEMENT SHOULD SAY HOW DAMAGING THE PESTICIDE IS TO MICRO-ORGANISMS AND PHYTOPLANKTON, AS WELL AS HOW MANY VERTEBRATE SPECIES IT WILL CAUSE HORMONE DISRUPTION TO, INCLUDING HUMANS.

Vrey important.

An excellent idea.

Great incentive for more progressive technologies.

another way to stop investment

The data is not there to allow including GHG emissions in such studies. You obviously have not thought this through in the least. You don't even know what to measure to incorporate GHG impacts in environmental studies.

Studies show that there is zero climate benefit to investing in GHG reduction infrastructure and monitoring. Clearly there is no consensus on any benefit to GHG reduction. CO2 is too small in % of atmosphere to drive climate.

This is a very costly process. I object to my taxpayer dollars being spent in such a manner. WASTE OF TIME AND MONEY. MOSTLY BS ANYWAY.

More time will be needed for reseach to provide degrees of linkage between activities and climate effects.

Garbage

This will improve understanding of the contributions to GHG emissions.

NO more delay in environmental document. Cleary a Jensen idea, NO NO NO

The CO2 being produced by humans is such a small piece, how do we know that we are having a negative impact? If inacted how is this achieved with the technology available?

Will do nothing to help and will only drive costs up.

If done right.

A critical decision-making component.

Just more government regulation

A biased assessment of our gas emissions is neither useful nor educational. I have yet to see a study that has not carte blanche accepted that humans are efficient enough to be both the cause of global warming or the cure. Many studies and scientists claim that the phenomem is both natural and unchangable, with humans providing a minimal impact. Unfortunately, that is not the politically correct view so it is not addressed or even considered. Maybe we need to start figuring out ways of living with the changes rather than destroying the world's economy in a vain attempt to mitigate the changes.

Absolutely! Environmental costs should be considered and they should be paid by developers.

This Action Plan was not a Montana grassroots Plan. It was the same plan written for California and other states.

until technology is available this will only stop all development in the State

<http://www.righttalk.com/asx/ggws.aspx>

This whole program looks like another government con job/scam to impose more government on us. My sources tell me we have plenty of natural resource and the global warming/greenhouse gases and Al Gore need to be totally ignored.

Analysis Paralysis!

Environmental impact statement are the best way to slow down progress in our state, and adding more requirement to it will only discourage businesses from moving to and building in Montana. We already have even in our big cities some of the best air quality in the nation, and that should be enough.

EIS's and EA's are the major stop to anything. The enviro's will be able to stop anything with this included. It wouldn't be so bad if you could genuinely quantify GHG and relate a direct effect.

Start with volcanos if you can get control of them move on to plants and animals if this succeeds turn your attention to the oceans but please do this on your own time not with tax money

Another tool for enviros to use against development or price development so high nothing will happen.

Let us require an EI on voter redistricting. Redistricting has doubled the amount of mile votes in by district have had to drive. Long rural arms kidnapped into rural areas creates extra driving on the part of vampaigners also. Politicians should be monitored and fined if campaign promises turn out to be wasted exhalation of CO₂. Let us set up GHG monitors and outhouses for all Montanas to use when we RED Tape the businesses out of business and go back as our grandparents did.

problematic? Are there accepted methods to estimate, or would this just get things balled up in courts? If estimates calculated are acceptable and would inform a decision maker, OK. But is there sufficient science, and what good would qualitative info do?

Probably being done already. Shouldn't be given more weight than other factors

Yes very important.

no such thing

This is OK, but let's also make sure we really understand what role man-made GHG will play in climate change. I believe we need to be responsible, but let's not go to the point of causing lifestyle changes and increased costs unless they really make a difference. I think a lot of what's recommended is overreaction at this time. Some is good, by 54 recommendations?????

This makes sense for new proposals but not existing facilities

This should be an issue that the US Congress deals with and managed by the EPA

Need a national approach on this not a state mandated approach.
con games

Montana is not the cause of pollution, so why hamstring ourselves?

We should have already been doing this.

There is no valid scientific basis to require addressing GHG emissions to be considered as part of environmental impact studies. There has been no valid scientific link established between human produced carbon dioxide and temperature variations. Until that link is validated by the scientific method, GHG emissions' impacts are not required.

Arrogance to think we make a significant impact. Ignorance to waste money studying it.

The science is not there yet. This would be irresponsible at this point.

OF course, it should be included in any government action.

Only follow national programs.

This is always a good idea.

This would be just another invitation for conflict resolution through lawsuits by environmental activists.

I encourage objective review of genuine scientific studies of the issue. Pay attention to the critics of the "Climat Change Mania." A simple review of NASA's website reveals that CO2 comprises an insignificant portion of our atmosphere and that portion that society has any control over is even less. Reductions in man-caused CO2 emissions WILL NOT have a significant effect on climate change.

Yes!

Informed decisions means both sides weighed on the issue.

A necessity.

Scientific theories on global warming do not warrant new taxes or legislation. Need additional analysis to understand impact on consumers and penalties on business development.

No brainer - definitely

NO, we are already feeling the effects of the environmental lobby on all of the industry of the nation. We do not need another arrow in their quiver.

This recommendation has the potential to dramatically increase the time required to do environmental documents and increased potential for additional lawsuits. It is particularly difficult to assess when there are significant unanswered questions regarding the extent of the analysis, for example, Is this a lifecycle analysis of emissions. This recommendation could add significant delay to the permitting process.

If this isn't implemented it will be litigated.

Required - law - statute - regulation - all leading to the absolute control of the people.

It is important to make informed decisions, but who is going to determine what is fact and what is fiction? In the past a lot of fiction has been passed as fact.

All of these are 'feel good' expensive bulls**t legislation. Global warming is NOT a fact (cold records set last winter in the southern hemisphere) so it might be Northern hemisphere warming, but not global. Secondly, latest studies of the sun spots (that control global temperatures more than humans) indicate that within 20 years we will be back in a 'mini-ice age'. Not politically correct, but MUCH more accurate.

Vague

NONSENSE . . . Deliver people from all this useless effort. . . for no purpose !!!

Good. More requirements. Just what we need.

Good way to kill more new projects and businesses. Give the opposition industry another weapon.

Criteria? Who decides and What is the goal?

Why? Prove that greenhouse gases are affecting climate

Absolutely not

ABSOLUTELY

make sure you add another month or two to the writing and review process to get the work done. Otherwise this is just another requirement in an already overly compressed timeframe.

Crucial, yes. Thank you.

It is not clear what effect if any we have on climate change through the emission of "green house gases". Therefore there is no basis for evaluating the emissions.

There are better more efficient ways to do this than a impact statement that can be doctored by anybody.

Leading to more lawsuits by environmental activists - more cost to the taxpayers.

This will only lead to more court challenges and appeals to BER, by those who have their own ideas regarding the evaluations. Another roadblock to development.

No, but I know they will do it anyway. More ways to spend taxpayers money.

Establish time frame.

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No.

This is too ambiguous.

Very important

This should depend on the study. GHG emissions would be a moot point in study of some kinds of wildlife management actions.

Based on the fact that GHG emissions are not proven to affect global warming it would be stupid to incorporate this into any EIS evaluation.

caution on how much weighting it would have in the evaluation.

This is absolutely essential. Activities emitting high levels of GHG cannot be permitted any longer. New activities adding GHG beyond BAU were not calculated into the forecasts so allowing more such projects would make it even more difficult to meet our goals.

Essential, and should add wind and solar impacts of development on surrounding property should highrise development become the norm in metro areas. Building shadows and wind generation can impact solar panels and other energy conservaton projects on adjacent property. (See Seattle's EI requirements for example.) Trip genertaiton and fule consumpton should be considered when workforce/affordable housing subdivisons are proposed many miles for schools and places of employment without mass transit. Impact mitigation should be a consideration.

this is a no-brainer

ALREADY TOO COMPLICATED A PROCESS (EIS)

GNP expects that federal legislation to regulate GHG emissions will be passed in the near future and we are developing our business plans accordingly. In the meantime, we believe it would be ill-advised for Montana to adopt GHG emissions regulations in advance of federal legislation. Any regional or Montana-specific regulations would have an infinitesimal impact on global climate change. "Early adoption" of regulations would impose significant costs on Montana businesses and consumers and would send an anti-business message to energy developers driving new projects and related investment to neighboring energy-producing states such as Wyoming and North Dakota.
increased costs no benefit

come on, give us a break. let's just forget about development period.

Already being done in most cases - disclosure of environmental affects is required in existing law.

Crucial.

there is climate change. But mans impact is limited. Maybe as little as less than 3-5%need cost benefit analysis

sure, one can account for it, but there's no readily available technology to implement now. Maybe in a decade it'll be ready for roll-out.

Identifying GHG emissions associated with projects is a reasonable goal, but consideration must be given as to whether these are the best mechanisms for emission evaluation.

Again, without any detail, it is impossible to make an informed judgement.

No hysteria. We need development. don't hamstring us with more requirements than technology

another target for environmental lawyers to stop everything and anything.

Only if private funds are used, no tax payer dollars.

There is a lack of knowledge about emissions associated with various land use activities that limits the accuracy of these assessments. We think this is premature.

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Increased litigation, delay and costs. Can agency deny a permit if there is no ghg regulation either on a state level or a federal level? If not, the inclusion of such a study in the permitting process would only serve to satisfy a curiosity or provide a hook for litigation.

This is where it should be required to assess emissions on every proposed project.