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Comments: Concerns Relating to New Environmental Policy Act Guidelines being Ignored

The NEPA Council for Environmental Quality has provided as of 01/09/2023 interim guidance to "assist agencies to make use of it immediately while CEQ seeks public comment on the guidance". You say in the Telephone Gap Scoping Documents that you have "complied with guidance", and yet this seems not to be the case, regarding carbon accounting.

The guidelines stipulate: "Given the urgency of the climate crisis and NEPA's important role in providing critical information to decision makers and the public, NEPA reviews should quantify proposed actions' GHG emissions, place GHG emissions in appropriate context and disclose relevant GHG emissions and relevant climate impacts, and identify alternatives and mitigation measures to avoid or reduce GHG emissions. CEQ encourages agencies to mitigate GHG emissions associated with their proposed actions to the greatest extent possible, consistent with national, science-based GHG reduction policies established to avoid the worst impacts of climate change." [7]

Summary of the 3 main points in my comment,

1. The very first item in these guidelines notes that they are: "recommending that agencies leverage early planning processes to integrate GHG emissions and climate change considerations into the identification of proposed actions, reasonable alternatives (as well as the no-action alternative), and potential mitigation and resilience measures"; This seems to have been ignored, particularly the mitigation part.

2. Where in the scoping documents was the carbon impact of doing nothing as compared to what has been proposed been analyzed?

3. It seems that the agency has sought to adapt to climate change based on practices that are not based on good scientific evidence. Additional logging for resilience, or destruction of older forest habitat for stumps, are not at all consistent with planning for actual reduction of greenhouse gas emissions and hence climate mitigation as the guidelines indicate, given the "urgency of the climate crisis".