

## EPA Climate Adaptation Guide Faulted For Sidestepping Mitigation Options

EPA's draft plan for adapting to the effects of climate change is prompting criticism from environmentalists and others for sidestepping discussion of mitigation measures such as new agency regulations to curb greenhouse gases (GHGs), and for lacking specificity to guide EPA program offices on how to pursue climate adaptation measures.

Others are also faulting the plan for various reasons, including Texas' argument that the plan is "unnecessary" and flawed because it suggests states consider climate adaptation when crafting blueprints for attaining federal air standards for conventional pollutants. State water officials, meanwhile, say the agency needs to bolster consideration of climate's water impacts, including how adaptation measures by EPA might impact future Clean Water Act rules.

EPA in a Feb. 8 Federal Register notice released an updated draft annual sustainability plan that for the first time includes guidelines on steps the agency will take to adapt to global warming such as integrating climate into its policies and programs, with EPA saying climate adaptation now must be a part of its underlying mission to protect human health and the environment. The agency took comment on the draft sustainability plan through April 9.

EPA will "integrate, or mainstream, considerations of climate change into its programs, policies, rules and operations to ensure they are effective under future climatic conditions. Through climate adaptation planning, EPA will continue to protect human health and the environment, but in a way that accounts for the effects of climate change."

The draft lists priority actions under EPA's existing five strategic goals -- one of which is climate change -- and begins to assess known vulnerabilities including its own facilities, staff and operations.

"Increased frequency and severity of extreme weather events may affect Agency facilities, personnel, safety, physical security and emergency communications," according to the draft plan.

In April 9 comments a coalition of 30 environmental groups warns of key omissions that "will limit the effectiveness of EPA's climate change adaptation efforts." The groups call on the agency to discuss the "critical linkage" between climate change mitigation and adaptation, noting that adaptation is far more difficult and costly without mitigation.

They also want EPA to "acknowledge and discuss its critical role and

regulatory responsibility to achieve the necessary, science-based greenhouse gas mitigation reductions through full implementation of the Clean Air Act, Clean Water Act, National Environmental Policy Act, and other laws."

The Center for Biological Diversity -- one of the environmental groups that signed on to the letter -- in a statement issued with the comments says EPA's draft sustainability plan has "fatal flaws" for omitting "its own crucial role in national greenhouse pollution reductions. . . . It makes no sense for the government to lay out a plan for coping with climate change dangers without mentioning its own critical role in reducing those threats."

The Nebraska-based Center for Rural Affairs echoes those concerns in its comments. While the group praises the agency for focusing on climate change's adverse impacts on rural residents, it notes, "Protecting the livelihood of these communities should not stop merely at adaptation," while adding "the agency [should] also be more active in reducing carbon emissions and promoting a transition to clean and renewable sources of energy."

Additionally, the Center for Climate Change Law at Columbia University is also critical of the plan in its comments, arguing that the plan

is “too qualitative and high level to inform a recommended course of action.” For example, the group says the draft provides no direction for program and regional offices to develop their own implementation plans, and it lacks information about what should be included in a vulnerability assessment.

### **States’ Comments**

However, the state of Texas -- an opponent of EPA’s GHG rules -- argues in its comments that the plan is “unnecessary” and urges EPA to ensure in any final document that it does not place any obligations on states.

The state also argues that it is “inappropriate” for EPA’s plan to attempt to account for climate change in the ozone state implementation plan (SIP) process, through which states are required to draft plans for cutting emissions and attaining EPA’s ozone ambient air standard. Texas say the current SIP process already takes into account that “factors in the future, regardless of the cause, may interfere with attainment and maintenance of” an air quality standard.

Texas’ comments are the opposite of what Minnesota is seeking. That state in April 8 comments urges EPA to accelerate its efforts “to help build the capability of state and local communities to under take and implement adaptation efforts.” Minnesota also identifies a “significant lack of financial resources dedicated to climate adaptation throughout the country” and asks the agency to consider integrating adaptation into the EPA grant process and other financial assistance mechanisms.

Water coalitions including groups representing state water officials also weighed in on the plan and are generally urging EPA to focus more broadly on water supply and drinking water issues.

For example, the Western Urban Water Coalition in its April 9 comments says, “We would like to see water play a more central role in addressing climate change impacts overall and in EPA’s adaptation strategies. Unfortunately, the plan is focused on EPA’s ability to fulfill its mission and overlooks the significant challenges water utilities face from climate change in fulfilling their missions.” The group also asks EPA to “adjust regulatory approaches to ensure that they take fully into account the degree to which climate change impacts the baseline factors for existing and new regulations under the Clean Water Act.”

The Association of State Drinking Water Officials says in April 5 comments that the plan accurately portrays the various environmental issues and implications for water that are associated with climate change while asking EPA to better explain how it will work across programs within the agency and to add a measure for partner efforts. It also seeks an emphasis on funding.

And the New England Interstate Water Pollution Control Commission in April 9 comments asks EPA to “frame climate change adaptation efforts around an ‘all-hazards approach’” as a way to integrate the issue across all “adaptation sectors and phases, including funding, design, construction and operations.”

It also asks EPA to elaborate on its roles and its partners’ roles on adaptation asking how EPA will use the report to develop “any new or unique approaches” to adaptation. -- Dawn Reeves (dreeves@iwpnews.com)

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