

**APPENDIX A. PUBLIC INVOLVEMENT AND AGENCY AND TRIBAL  
COORDINATION**

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**Mailing List**

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Reference Librarian  
Thomas Branigan Memorial Library  
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Las Cruces, NM 88001

Reference Librarian  
El Paso Public Library - José Cisneros Cielo  
Vista Branch  
1300 Hawkins Blvd  
El Paso, TX 79925

Reference Librarian  
El Paso Public Library - Main Branch  
501 N. Oregon St  
El Paso, TX 79901

**DEPARTMENT OF THE ARMY**  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT BLISS  
1741 MARSHALL ROAD  
FORT BLISS, TEXAS 79916

8 February 2024

SUBJECT: Legislative Environmental Assessment for the Extension of the Withdrawal of Public Lands Within McGregor Range, Fort Bliss Army Reservation, El Paso, Texas

Mark Woommavovah, Chairman  
Comanche Nation  
PO Box 908  
Lawton OK 73502

Dear Mr. Woommavovah

The United States (US) Army is preparing a Legislative Environmental Assessment (LEA) to evaluate the potential environmental impacts associated with the extension of the withdrawal of public lands within McGregor Range, New Mexico, part of Fort Bliss, Texas, in compliance with the National Environmental Policy Act of 1969 (NEPA) (Title 42 United States Code § 4321 et seq.); regulations of the President's Council on Environmental Quality that implement NEPA procedures (Title 40 Code of Federal Regulations [CFR] Parts 1500–1508); Army Regulation 200-1, Environmental Protection and Enhancement; and 32 CFR Part 651, Environmental Analysis of Army Actions. The withdrawn lands within McGregor Range are managed by the Army and the US Bureau of Land Management in accordance with a Memorandum of Agreement signed 7 December 2007, expiring 6 November 2026 unless canceled or renewed before that date.

The purpose of the Proposed Action is to continue to provide a safe and secure location to train military personnel and test equipment to meet nationally directed missions and requirements. The Proposed Action is needed to provide the US Armed Forces with training areas of the size and configuration of McGregor Range to realistically prepare soldiers and units for known and emerging threats.

To consider possible environmental concerns, the Army is engaging early with all potentially affected Native American tribes as it formulates the undertaking. Accordingly, the Army seeks consultation with the White Mountain Apache Tribe in Arizona; Comanche Nation, Kiowa Tribe, and Fort Sill Apache Tribe in Oklahoma; Mescalero Apache Tribe and Pueblo of Isleta in New Mexico; and Ysleta Del Sur Tribe in Texas.

Pursuant to Section 106 of the National Historic Preservation Act, implementing regulations at 36 CFR Part 800, and Department of Defense (DoD) Instruction 4710.02, DoD Interactions with Federally Recognized Tribes, we request government-to-government consultation with the Comanche Nation on the Proposed Action. Pursuant to 36 CFR §§ 800.4(a) and (b), we request your assistance to identify properties of historic, cultural, or religious significance that may be located within the Area of Potential Effect for this action and any concerns of potential effects of the Proposed Action on significant cultural resources. A McGregor Range vicinity map is enclosed with this letter. The Army desires to discuss the proposal in detail with you so that we may understand and consider any comments, concerns, and suggestions you may have.

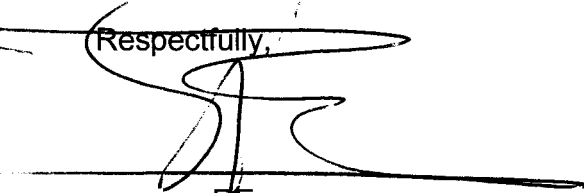
In particular, we invite you, pursuant to 36 CFR § 800.4(a)(4), to provide information on any properties of historic, religious, or cultural significance that may be affected by our proposed undertaking. The Army will comply with the Native American Graves Protection and Repatriation Act by informing you of any inadvertent discovery of archaeological or human remains and consulting on their disposition. Being defined as a federal undertaking, we will be seeking input and inviting other potential consulting parties, such as the New Mexico State Historic Preservation Office.

The LEA will assess the potential environmental consequences associated with the Proposed Action and Alternatives, including the No Action Alternative. Potential impacts identified during the initial planning stages include effects on air quality; water, geological, cultural, and biological resources; land use; noise; infrastructure; hazardous materials and waste; airspace; socioeconomics; and environmental justice and protection of children. The LEA will examine the cumulative effects when combined with past, present, and reasonably foreseeable environmental trends and future actions at Fort Bliss. In support of this process, we request your input in identifying general or specific issues or areas of concern you believe should be addressed in the LEA. We intend to notify your office when the Draft LEA is completed and welcome comments and input at that time as well.

Specific written comments including attachments may be submitted by email to [usarmy.bliss.id-readiness.mbx.dpw-nepa-support@army.mil](mailto:usarmy.bliss.id-readiness.mbx.dpw-nepa-support@army.mil) or via US postal mail, or in person (Monday through Friday, 8:00 a.m. to 4:30 p.m., excluding holidays). The mailing address is 624 Pleasonton, Fort Bliss, TX 79916. We respectfully request that comments be submitted no later than 30 days after receipt of this letter so that they can be included in the Draft LEA, which will be published for review and comment by the general public. Commenters should clearly articulate their concerns and contentions related to the project proposal. Comments should be within the scope of the Proposed Action, have a direct relationship to the Proposed Action, and must include supporting reasons for the responsible official to consider (36 CFR § 218.2).

Please direct any questions regarding the action or the scoping process to the NEPA Program Manager, Environmental Division, Directorate of Public Works, at (915) 568-5162 or by email.

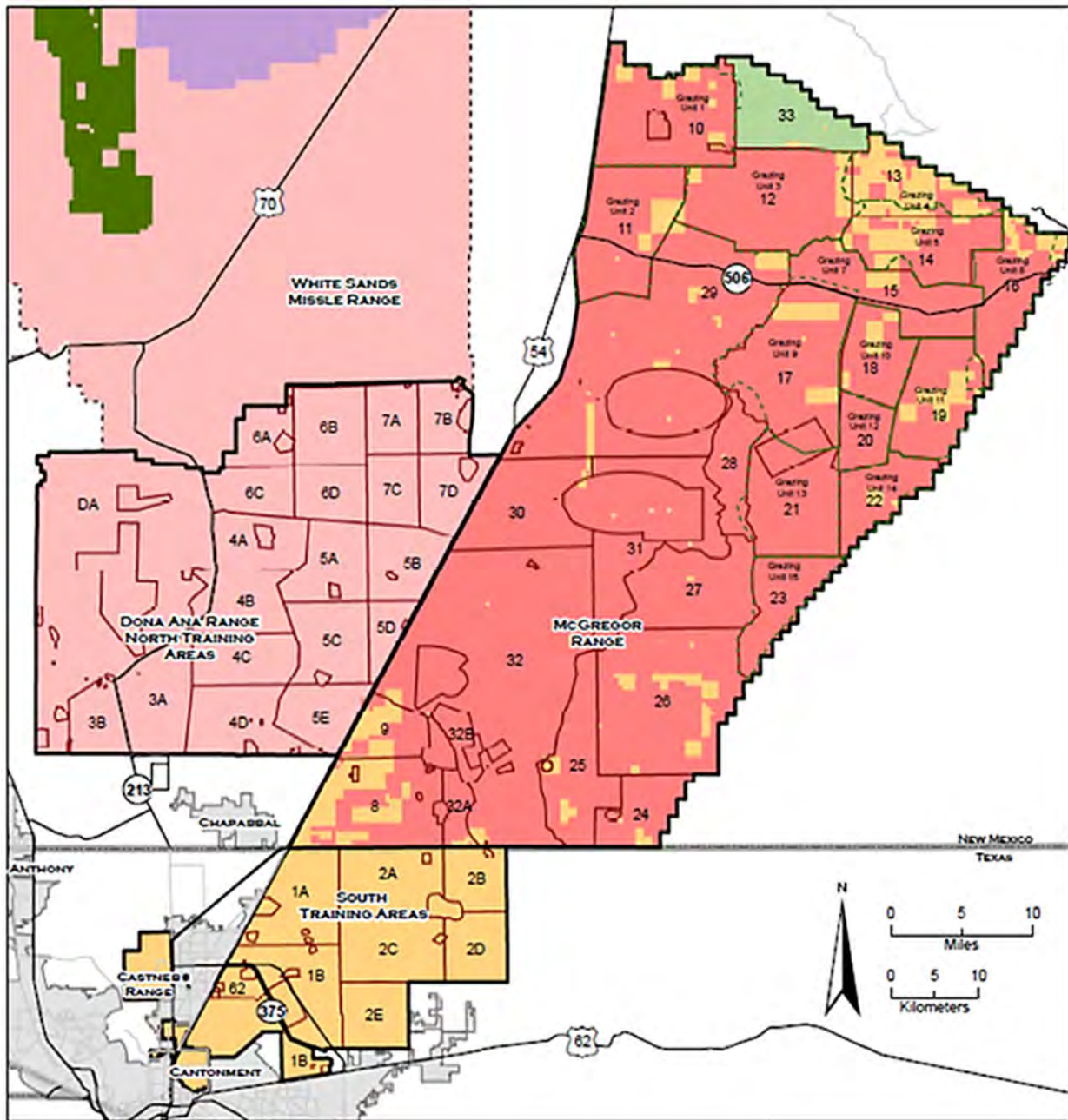
The Army appreciates your interest in and support of its military mission at Fort Bliss. We thank you in advance for your assistance and look forward to your response.

Respectfully,  
  
RE

Enclosure: McGregor Range Vicinity Map

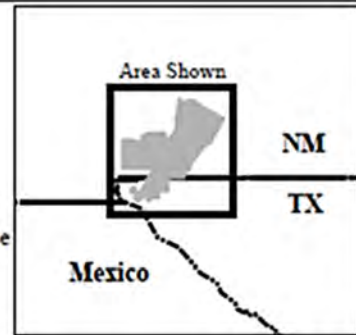


Enclosure: McGregor Range Vicinity Map



**Legend**

- Army FEE- Owned Land
- PLO 833 Lands- No DOI Management (1952)
- PL 106-65 Lands- DOI use with military concurrence (1999 renew 2026)
- USDA FS and US Army COE - MOU (1971)
- San Andres- National Wildlife Refuge
- White Sands National Monument
- Military Training Areas
- Agricultrl And Grazing Outlease
- Fort Bliss Boundary
- WSMR Boundary





**DEPARTMENT OF THE ARMY**  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT BLISS  
1741 MARSHALL ROAD  
FORT BLISS, TEXAS 79916

June 21, 2024

MEMORANDUM FOR: NEW MEXICO STATE HISTORIC PRESERVATION DIVISION

SUBJECT: Legislative Environmental Assessment for Renewal of the Withdrawal of Public Lands Within McGregor Range, Fort Bliss Army Reservation, El Paso, Texas

Michelle Ensey  
State Historic Preservation Officer  
New Mexico State Historic Preservation  
407 Galisteo St  
Santa Fe, NM 87524

Dear Ms. Ensey

The United States (US) Army is preparing a Legislative Environmental Assessment (LEA) to evaluate the potential environmental impacts associated with the renewal of the withdrawal of public lands within McGregor Range, New Mexico, part of Fort Bliss, Texas, in compliance with the National Environmental Policy Act of 1969 (NEPA) (Title 42 United States Code § 4321 et seq.); regulations of the President's Council on Environmental Quality that implement NEPA procedures (Title 40 Code of Federal Regulations [CFR] Parts 1500–1508); Army Regulation 200-1, Environmental Protection and Enhancement; and 32 CFR Part 651, Environmental Analysis of Army Actions. The withdrawn lands within McGregor Range are managed by the Army and the US Bureau of Land Management in accordance with a Memorandum of Agreement signed 7 December 2007, expiring 6 November 2026 unless canceled or renewed before that date.

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To consider possible environmental concerns, the Army is engaging early with all potentially affected resource agencies as it formulates the undertaking. Accordingly, the Army seeks consultation with the State Historic Preservation Office.

Pursuant to 36 CFR §§ 800.4(a) and (b), we request your assistance to identify any concerns of potential effects of the Proposed Action on significant cultural resources. A McGregor Range vicinity map is enclosed with this letter. Your comments will help us develop the scope of the LEA.

AMIM-BLP-E

SUBJECT: Legislative Environmental Assessment for Renewal of the Withdrawal of Public Lands Within McGregor Range, Fort Bliss Army Reservation, El Paso, Texas

The LEA will assess the potential environmental consequences associated with the Proposed Action and Alternatives, including the No Action Alternative. Potential impacts identified during the initial planning stages include effects on air quality; water, geological, cultural, and biological resources; land use; noise; infrastructure; hazardous materials and waste; airspace; socioeconomics; and environmental justice and protection of children. The LEA will examine the cumulative effects when combined with past, present, and reasonably foreseeable environmental trends and future actions at Fort Bliss. In support of this process, we request your input in identifying general or specific issues or areas of concern you believe should be addressed in the LEA. We intend to notify your office when the Draft LEA is completed and welcome comments and input at that time.

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Please direct any questions regarding the action or the scoping process to the NEPA Program Manager, Environmental Division, Directorate of Public Works, at (915) 568-1455 or by email.

The Army appreciates your interest in and support of its military mission at Fort Bliss. We thank you in advance for your assistance and look forward to your response.

Respectfully,

FABIOLA SILVA  
Cultural Resource Manager  
Environmental Division  
Directorate of Public Works

Enclosure: McGregor Range Vicinity Map

# McGregor Range Vicinity Map



Sources: Esri, USGS, NOAA

## McGregor Range Vicinity Map

Military Installation Boundaries



0 10 Miles

Coordinate System: NAD 83 UTM Zone 13N





**DEPARTMENT OF THE ARMY**  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT BLISS  
1741 MARSHALL ROAD  
FORT BLISS, TEXAS 79916

June 21, 2024

MEMORANDUM FOR: ADVISORY COUNCIL ON HISTORIC PRESERVATION

SUBJECT: Legislative Environmental Assessment for Renewal of the Withdrawal of Public Lands Within McGregor Range, Fort Bliss Army Reservation, El Paso, Texas

Reid J. Nelson  
Executive Director  
Advisory Council on Historic Preservation  
401 F Street NW, Suite 308  
Washington, DC 20001

Dear Mr. Nelson

The United States (US) Army is preparing a Legislative Environmental Assessment (LEA) to evaluate the potential environmental impacts associated with the renewal of the withdrawal of public lands within McGregor Range, New Mexico, part of Fort Bliss, Texas, in compliance with the National Environmental Policy Act of 1969 (NEPA) (Title 42 United States Code § 4321 et seq.); regulations of the President's Council on Environmental Quality that implement NEPA procedures (Title 40 Code of Federal Regulations [CFR] Parts 1500–1508); Army Regulation 200-1, Environmental Protection and Enhancement; and 32 CFR Part 651, Environmental Analysis of Army Actions. The withdrawn lands within McGregor Range are managed by the Army and the US Bureau of Land Management in accordance with a Memorandum of Agreement signed 7 December 2007, expiring 6 November 2026 unless canceled or renewed before that date.

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AMIM-BLP-E

SUBJECT: Legislative Environmental Assessment for Renewal of the Withdrawal of Public Lands Within McGregor Range, Fort Bliss Army Reservation, El Paso, Texas

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Please direct any questions regarding the action or the scoping process to the NEPA Program Manager, Environmental Division, Directorate of Public Works, at (915) 568-1455 or by email.

The Army appreciates your interest in and support of its military mission at Fort Bliss. We thank you in advance for your assistance and look forward to your response.

Respectfully,

FABIOLA SILVA  
Cultural Resource Manager  
Environmental Division  
Directorate of Public Works

Enclosure: McGregor Range Vicinity Map

# McGregor Range Vicinity Map



Sources: Esri, USGS, NOAA

## McGregor Range Vicinity Map

Military Installation Boundaries



0 10 Miles

Coordinate System: NAD 83 UTM Zone 13N



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## APPENDIX B. AIR CONFORMITY ANALYSIS

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# AIR CONFORMITY APPLICABILITY MODEL REPORT RECORD OF AIR ANALYSIS (ROAA)

**1. General Information:** The Air Force's Air Conformity Applicability Model (ACAM) was used to perform a net change in emissions analysis to assess the potential air quality impact/s associated with the action. The analysis was performed in accordance with the Air Force Manual 32-7002, *Environmental Compliance and Pollution Prevention*; the *Environmental Impact Analysis Process* (EIAP, 32 CFR 989); the *General Conformity Rule* (GCR, 40 CFR 93 Subpart B); and the *USAF Air Quality Environmental Impact Analysis Process (EIAP) Guide*. This report provides a summary of the ACAM analysis.

**a. Action Location:**

**Base:** GENERIC BASE  
**State:** New Mexico  
**County(s):** Otero  
**Regulatory Area(s):** NOT IN A REGULATORY AREA

**b. Action Title:** McGregor Extention

**c. Project Number/s (if applicable):**

**d. Projected Action Start Date:** 1 / 2024

**e. Action Description:**

Under the Proposed Action, Congress would extend the withdrawal supporting the McGregor Range with the same conditions as provided in the National Defense Authorization Act for Fiscal Year 2000 (P.L. 106 65). As mentioned in Section 1.7.3, the MLWA established the current withdrawal of McGregor Range, which terminates 6 November 2026. The Army is requesting withdrawal of the public lands comprising McGregor Range for an additional 25 years (until 6 November 2051) starting after the current withdrawal expires. No changes to the current McGregor Range boundary would be requested. Under the Proposed Action, Congress would extend the withdrawal of 608,835 acres of public land previously withdrawn for military use under P.L. 106 65. The 71,083 acres of Army fee-owned lands and 18,004 acres of USFS lands used by the Army under the MOA would not be affected by the Proposed Action (see Section 1.2 and Figure 1-2).

As outlined at 43 CFR Part 2300, the land withdrawal process consists of the following steps: conduct pre-application consultations, prepare the application and publish the application in the Federal Register, prepare supporting studies and reports, prepare BLM recommendations, transmit the case file to the Director of BLM and Secretary of the Interior, submit draft legislation and the case file to the US Congress, and await legislative action by Congress. This LEA satisfies the requirement to prepare environmental review to accompany other supporting studies and reports.

**f. Point of Contact:**

**Name:** J. Michael Nied  
**Title:** Environmental Engineer/ Project Manager  
**Organization:** Environmental Assessment Services, LLC  
**Email:** mnied@easbio.com  
**Phone Number:** 608.797.1326

**2. Air Impact Analysis:** Based on the attainment status at the action location, the requirements of the GCR are:

applicable  
 not applicable

# AIR CONFORMITY APPLICABILITY MODEL REPORT RECORD OF AIR ANALYSIS (ROAA)

Total reasonably foreseeable net direct and indirect emissions associated with the action were estimated through ACAM on a calendar-year basis for the start of the action through achieving “steady state” (hsba.e., no net gain/loss in emission stabilized and the action is fully implemented) emissions. The ACAM analysis uses the latest and most accurate emission estimation techniques available; all algorithms, emission factors, and methodologies used are described in detail in the *USAF Air Emissions Guide for Air Force Stationary Sources*, the *USAF Air Emissions Guide for Air Force Mobile Sources*, and the *USAF Air Emissions Guide for Air Force Transitory Sources*.

"Insignificance Indicators" were used in the analysis to provide an indication of the significance of the proposed Action’s potential impacts to local air quality. The insignificance indicators are trivial (de minimis) rate thresholds that have been demonstrated to have little to no impact to air quality. These insignificance indicators are the 250 ton/yr Prevention of Significant Deterioration (PSD) major source threshold and 25 ton/yr for lead for actions occurring in areas that are "Attainment" (hsba.e., not exceeding any National Ambient Air Quality Standard (NAAQS)). These indicators do not define a significant impact; however, they do provide a threshold to identify actions that are insignificant. Any action with net emissions below the insignificance indicators for all criteria pollutants is considered so insignificant that the action will not cause or contribute to an exceedance on one or more NAAQS. For further detail on insignificance indicators, refer to *Level II, Air Quality Quantitative Assessment, Insignificance Indicators*.

The action’s net emissions for every year through achieving steady state were compared against the Insignificance Indicators and are summarized below.

**Analysis Summary:**

### 2024

Pollutant	Action Emissions (ton/yr)	INSIGNIFICANCE INDICATOR	
		Indicator (ton/yr)	Exceedance (Yes or No)
NOT IN A REGULATORY AREA			
VOC	1.282	250	No
NOx	12.300	250	No
CO	10.612	250	No
SOx	0.022	250	No
PM 10	1060.673	250	Yes
PM 2.5	0.487	250	No
Pb	0.000	25	No
NH3	0.003	250	No

### 2025

Pollutant	Action Emissions (ton/yr)	INSIGNIFICANCE INDICATOR	
		Indicator (ton/yr)	Exceedance (Yes or No)
NOT IN A REGULATORY AREA			
VOC	1.157	250	No
NOx	10.547	250	No
CO	9.853	250	No
SOx	0.022	250	No
PM 10	1060.594	250	Yes
PM 2.5	0.414	250	No
Pb	0.000	25	No
NH3	0.003	250	No

# AIR CONFORMITY APPLICABILITY MODEL REPORT RECORD OF AIR ANALYSIS (ROAA)

**2026**

Pollutant	Action Emissions (ton/yr)	INSIGNIFICANCE INDICATOR	
		Indicator (ton/yr)	Exceedance (Yes or No)
NOT IN A REGULATORY AREA			
VOC	1.101	250	No
NOx	9.649	250	No
CO	9.540	250	No
SOx	0.022	250	No
PM 10	1060.555	250	Yes
PM 2.5	0.379	250	No
Pb	0.000	25	No
NH3	0.003	250	No

**2027 - (Steady State)**

Pollutant	Action Emissions (ton/yr)	INSIGNIFICANCE INDICATOR	
		Indicator (ton/yr)	Exceedance (Yes or No)
NOT IN A REGULATORY AREA			
VOC	0.000	250	No
NOx	0.000	250	No
CO	0.000	250	No
SOx	0.000	250	No
PM 10	0.000	250	No
PM 2.5	0.000	250	No
Pb	0.000	25	No
NH3	0.000	250	No

The estimated annual net emissions associated with this action temporarily exceeds the insignificance indicators. However, the steady state estimated annual net emissions are below the insignificance indicators showing no significant long-term impact to air quality. Therefore, the action will not cause or contribute to an exceedance on one or more NAAQs and will have an insignificant impact on air quality. No further air quality impact assessment is needed.

J. Michael Nied, Environmental Engineer/ Project Manager

Oct 19 2023

**Name, Title**

**Date**



# AIR CONFORMITY APPLICABILITY MODEL REPORT

## GREENHOUSE GAS (GHG) EMISSIONS

**1. General Information:** The Air Force's Air Conformity Applicability Model (ACAM) was used to perform an analysis to estimate GHG emissions and assess the theoretical Social Cost of Greenhouse Gases (SC GHG) associated with the action. The analysis was performed in accordance with the Air Force Manual 32-7002, Environmental Compliance and Pollution Prevention; the Environmental Impact Analysis Process (EIAP, 32 CFR 989); and the USAF Air Quality Environmental Impact Analysis Process (EIAP) Guide. This report provides a summary of GHG emissions and SC GHG analysis.

**a. Action Location:**

**Base:** GENERIC BASE  
**State:** New Mexico  
**County(s):** Otero  
**Regulatory Area(s):** NOT IN A REGULATORY AREA

**b. Action Title:** McGregor Extention

**c. Project Number/s (if applicable):**

**d. Projected Action Start Date:** 1 / 2024

**e. Action Description:**

Under the Proposed Action, Congress would extend the withdrawal supporting the McGregor Range with the same conditions as provided in the National Defense Authorization Act for Fiscal Year 2000 (P.L. 106 65). As mentioned in Section 1.7.3, the MLWA established the current withdrawal of McGregor Range, which terminates 6 November 2026. The Army is requesting withdrawal of the public lands comprising McGregor Range for an additional 25 years (until 6 November 2051) starting after the current withdrawal expires. No changes to the current McGregor Range boundary would be requested. Under the Proposed Action, Congress would extend the withdrawal of 608,835 acres of public land previously withdrawn for military use under P.L. 106 65. The 71,083 acres of Army fee-owned lands and 18,004 acres of USFS lands used by the Army under the MOA would not be affected by the Proposed Action (see Section 1.2 and Figure 1-2).

As outlined at 43 CFR Part 2300, the land withdrawal process consists of the following steps: conduct pre-application consultations, prepare the application and publish the application in the Federal Register, prepare supporting studies and reports, prepare BLM recommendations, transmit the case file to the Director of BLM and Secretary of the Interior, submit draft legislation and the case file to the US Congress, and await legislative action by Congress. This LEA satisfies the requirement to prepare environmental review to accompany other supporting studies and reports.

**f. Point of Contact:**

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**2. Analysis:** Total combined direct and indirect GHG emissions associated with the action were estimated through ACAM on a calendar-year basis from the action start through the expected life cycle of the action. The life cycle for Air Force actions with "steady state" emissions (SS, net gain/loss in emission stabilized and the action is fully implemented) is assumed to be 10 years beyond the SS emissions year or 20 years beyond SS emissions year for aircraft operations related actions.

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## GHG Emissions Analysis Summary:

GHGs produced by fossil-fuel combustion are primarily carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (NO<sub>2</sub>). These three GHGs represent more than 97 percent of all U.S. GHG emissions. Emissions of GHGs are typically quantified and regulated in units of CO<sub>2</sub> equivalents (CO<sub>2</sub>e). The CO<sub>2</sub>e takes into account the global warming potential (GWP) of each GHG. The GWP is the measure of a particular GHG’s ability to absorb solar radiation as well as its residence time within the atmosphere. The GWP allows comparison of global warming impacts between different gases; the higher the GWP, the more that gas contributes to climate change in comparison to CO<sub>2</sub>. All GHG emissions estimates were derived from various emission sources using the methods, algorithms, emission factors, and GWPs from the most current Air Emissions Guide for Air Force Stationary Sources, Air Emissions Guide for Air Force Mobile Sources, and/or Air Emissions Guide for Air Force Transitory Sources.

The Air Force has adopted the Prevention of Significant Deterioration (PSD) threshold for GHG of 75,000 ton per year (ton/yr) of CO<sub>2</sub>e (or 68,039 metric ton per year, mton/yr) as an indicator or "threshold of insignificance" for NEPA air quality impacts in all areas. This indicator does not define a significant impact; however, it provides a threshold to identify actions that are insignificant (de minimis, too trivial or minor to merit consideration). Actions with a net change in GHG (CO<sub>2</sub>e) emissions below the insignificance indicator (threshold) are considered too insignificant on a global scale to warrant any further analysis. Note that actions with a net change in GHG (CO<sub>2</sub>e) emissions above the insignificance indicator (threshold) are only considered potentially significant and require further assessment to determine if the action poses a significant impact. For further detail on insignificance indicators see Level II, Air Quality Quantitative Assessment, Insignificance Indicators (April 2023).

The following table summarizes the action-related GHG emissions on a calendar-year basis through the projected life cycle of the action.

Action-Related Annual GHG Emissions (mton/yr)						
YEAR	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e	Threshold	Exceedance
2024	2,159	0.08779455	0.01780999	2,167	68,039	No
2025	2,159	0.08769012	0.01778039	2,166	68,039	No
2026	2,158	0.08749895	0.01775907	2,165	68,039	No
2027 [SS Year]	0	0	0	0	68,039	No

The following U.S. and State’s GHG emissions estimates (next two tables) are based on a five-year average (2016 through 2020) of individual state-reported GHG emissions (Reference: State Climate Summaries 2022, NOAA National Centers for Environmental Information, National Oceanic and Atmospheric Administration. <https://statesummaries.ncics.org/downloads/>).

State’s Annual GHG Emissions (mton/yr)				
YEAR	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
2024	51,732,255	623,320	26,350	52,381,926
2025	51,732,255	623,320	26,350	52,381,926
2026	51,732,255	623,320	26,350	52,381,926
2027 [SS Year]	0	0	0	0

U.S. Annual GHG Emissions (mton/yr)				
YEAR	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
2024	5,136,454,179	25,626,912	1,500,708	5,163,581,798
2025	5,136,454,179	25,626,912	1,500,708	5,163,581,798
2026	5,136,454,179	25,626,912	1,500,708	5,163,581,798
2027 [SS Year]	0	0	0	0



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## GHG Relative Significance Assessment:

A Relative Significance Assessment uses the rule of reason and the concept of proportionality along with the consideration of the affected area (yGba.e., global, national, and regional) and the degree (intensity) of the proposed action’s effects. The Relative Significance Assessment provides real-world context and allows for a reasoned choice against alternatives through a relative comparison analysis. The analysis weighs each alternative’s annual net change in GHG emissions proportionally against (or relative to) global, national, and regional emissions.

The action’s surroundings, circumstances, environment, and background (context associated with an action) provide the setting for evaluating the GHG intensity (impact significance). From an air quality perspective, context of an action is the local area’s ambient air quality relative to meeting the NAAQSs, expressed as attainment, nonattainment, or maintenance areas (this designation is considered the attainment status). GHGs are non-hazardous to health at normal ambient concentrations and, at a cumulative global scale, action-related GHG emissions can only potentially cause warming of the climatic system. Therefore, the action-related GHGs generally have an insignificant impact to local air quality.

However, the affected area (context) of GHG/climate change is global. Therefore, the intensity or degree of the proposed action’s GHG/climate change effects are gauged through the quantity of GHG associated with the action as compared to a baseline of the state, U.S., and global GHG inventories. Each action (or alternative) has significance, based on their annual net change in GHG emissions, in relation to or proportionally to the global, national, and regional annual GHG emissions.

To provide real-world context to the GHG and climate change effects on a global scale, an action’s net change in GHG emissions is compared relative to the state (where action will occur) and U.S. annual emissions. The following table provides a relative comparison of an action’s net change in GHG emissions vs. state and U.S. projected GHG emissions for the same time period.

Total GHG Relative Significance (mton)					
		CO2	CH4	N2O	CO2e
2024-2037	State Total	155,196,766	1,869,961	79,051	157,145,778
2024-2037	U.S. Total	15,409,362,537	76,880,735	4,502,123	15,490,745,395
2024-2037	Action	6,476	0.262984	0.053349	6,498
Percent of State Totals		0.00417254%	0.00001406%	0.00006749%	0.00413509%
Percent of U.S. Totals		0.00004202%	0.00000034%	0.00000118%	0.00004195%

## Climate Change Assessment (as SC GHG):

On a global scale, the potential climate change effects of an action are indirectly addressed and put into context through providing the theoretical SC GHG associated with an action. The SC GHG is an administrative and theoretical tool intended to provide additional context to a GHG’s potential impacts through approximating the long-term monetary damage that may result from GHG emissions affect on climate change. It is important to note that the SC GHG is a monetary quantification, in 2020 U.S. dollars, of the theoretical economic damages that could result from emitting GHGs into the atmosphere.

The SC GHG estimates are derived using the methodology and discount factors in the “Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide Interim Estimates under Executive Order 13990,” released by the Interagency Working Group on Social Cost of Greenhouse Gases (IWG SC GHGs) in February 2021.

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The speciated IWG Annual SC GHG Emission associated with an action (or alternative) are first estimated as annual unit cost (cost per metric ton, \$/mton). Results of the annual IWG Annual SC GHG Emission Assessments are tabulated in the IWG Annual SC GHG Cost per Metric Ton Table below:

IWG SC GHG Discount Factor: 2.5%

IWG Annual SC GHG Cost per Metric Ton (\$/mton [In 2020 \$])			
YEAR	CO2	CH4	N2O
2024	\$82.00	\$2,200.00	\$29,000.00
2025	\$83.00	\$2,200.00	\$30,000.00
2026	\$84.00	\$2,300.00	\$30,000.00
2027 [SS Year]	\$86.00	\$2,300.00	\$31,000.00

Action-related SC GHG were estimated by calendar-year for the projected action's lifecycle. Annual estimates were found by multiplying the annual emission for a given year by the corresponding IWG Annual SC GHG Emission value (see table above).

Action-Related Annual SC GHG (\$K/yr [In 2020 \$])				
YEAR	CO2	CH4	N2O	GHG
2024	\$177.06	\$0.19	\$0.52	\$177.77
2025	\$179.16	\$0.19	\$0.53	\$179.89
2026	\$181.25	\$0.20	\$0.53	\$181.99
2027 [SS Year]	\$0.00	\$0.00	\$0.00	\$0.00

The following two tables summarize the U.S. and State's Annual SC GHG by calendar-year. The U.S. and State's Annual SC GHG are in 2020 dollars and were estimated by each year for the projected action lifecycle. Annual SC GHG estimates were found by multiplying the U.S. and State's annual five-year average GHG emissions for a given year by the corresponding IWG Annual SC GHG Cost per Metric Ton value.

State's Annual SC GHG (\$K/yr [In 2020 \$])				
YEAR	CO2	CH4	N2O	GHG
2024	\$4,242,044.93	\$1,371,304.40	\$764,160.87	\$6,377,510.20
2025	\$4,293,777.19	\$1,371,304.40	\$790,511.24	\$6,455,592.83
2026	\$4,345,509.45	\$1,433,636.42	\$790,511.24	\$6,569,657.11
2027 [SS Year]	\$0.00	\$0.00	\$0.00	\$0.00

U.S. Annual SC GHG (\$K/yr [In 2020 \$])				
YEAR	CO2	CH4	N2O	GHG
2024	\$421,189,242.68	\$56,379,205.70	\$43,520,521.44	\$521,088,969.82
2025	\$426,325,696.86	\$56,379,205.70	\$45,021,229.08	\$527,726,131.63
2026	\$431,462,151.04	\$58,941,896.86	\$45,021,229.08	\$535,425,276.98
2027 [SS Year]	\$0.00	\$0.00	\$0.00	\$0.00

### Relative Comparison of SC GHG:

To provide additional real-world context to the potential climate change impact associate with an action, a Relative Comparison of SC GHG Assessment is also performed. While the SC GHG estimates capture an indirect approximation of global climate damages, the Relative Comparison of SC GHG Assessment provides a better perspective from a regional and global scale.

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The Relative Comparison of SC GHG Assessment uses the rule of reason and the concept of proportionality along with the consideration of the affected area (yGba.e., global, national, and regional) and the SC GHG as the degree (intensity) of the proposed action’s effects. The Relative Comparison Assessment provides real-world context and allows for a reasoned choice among alternatives through a relative contrast analysis which weighs each alternative’s SC GHG proportionally against (or relative to) existing global, national, and regional SC GHG. The below table provides a relative comparison between an action’s SC GHG vs. state and U.S. projected SC GHG for the same time period:

<b>Total SC-GHG (\$K [In 2020 \$])</b>					
		<b>CO2</b>	<b>CH4</b>	<b>N2O</b>	<b>GHG</b>
2024-2037	State Total	\$12,881,331.57	\$4,176,245.22	\$2,345,183.35	\$19,402,760.14
2024-2037	U.S. Total	\$1,278,977,090.57	\$171,700,308.26	\$133,562,979.60	\$1,584,240,378.43
2024-2037	Action	\$537.48	\$0.59	\$1.58	\$539.65
Percent of State Totals		0.00417252%	0.00001406%	0.00006749%	0.00278129%
Percent of U.S. Totals		0.00004202%	0.00000034%	0.00000118%	0.00003406%

From a global context, the action alternative’s total SC GHG percentage of total global SC GHG for the same time period is: 0.00000456%.\*

\* Global value based on the U.S. emits 13.4% of all global GHG annual emissions (2018 Emissions Data, Center for Climate and Energy Solutions, accessed 7-6-2023, <https://www.c2es.org/content/international-emissions>).

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Oct 19 2023

**Name, Title**

**Date**