

Originally Processed With FOIA(s):
2017-0310-F

FOIA Number:
2017-0310-F

FOIA MARKER

This is not a textual record. This is used as an administrative marker by the George Bush Presidential Library Staff.

Record Group/Collection: George H.W. Bush Presidential Records
Collection/Office of Origin: Cabinet Affairs, White House Office of
Series: Korfonta, Paul, Files
Subseries:

OA/ID Number: 07692
Folder ID Number: 07692-026

Folder Title:
Global Climate Change

Stack:	Row:	Section:	Shelf:	Position:
G	15	13	4	

Climate change or global warming

Document No. _____ CA

OFFICE OF CABINET AFFAIRS STAFFING MEMORANDUM

Date: 6-20-90

Due by: _____

Subject: Memo for Grady -- Climate Change Litigation

From: Juanita Duggan

	ACTION	CONCUR	FYI		ACTION	CONCUR	FYI
BATES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	JACKSON	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DANZANSKY	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	MCBEE	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ADAIR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SCHALL	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
BUCHHOLZ	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	WETHINGTON	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
D'ANDREA	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	WILLIAMSON	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
DEWITT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	YALE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DUGGAN	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EVANS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
FARRAR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HEIMBACH	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

Complete package in files already (see attached staff sheet in book)

THE WHITE HOUSE

WASHINGTON

June 20, 1990

MEMORANDUM FOR BOB GRADY

FROM: STEVE DANZANSKY

SUBJECT: Climate Change Litigation

You will remember that we met in April to discuss Dick Stewart's concerns about widely varying litigation positions on climate change adopted by the Departments and Agencies. At that time, it was agreed that OMB, through its management function, would provide a mechanism for coordinating the positions taken by the Departments regarding their activities' affect on climate change.

Please let me know ASAP your plans to implement such a mechanism or if Cabinet Affairs can be of any assistance to you.

THE WHITE HOUSE
WASHINGTON, DC

Date: June 20

FROM: Janita Puzar

		ACTION	FYI		ACTION	FYI
TO:	Holiday	<input type="checkbox"/>	<input type="checkbox"/>	Jackson	<input type="checkbox"/>	<input type="checkbox"/>
	Danzansky	<input checked="" type="checkbox"/>	<input type="checkbox"/>	McBee	<input type="checkbox"/>	<input type="checkbox"/>
	Adair	<input type="checkbox"/>	<input type="checkbox"/>	McMunn	<input type="checkbox"/>	<input type="checkbox"/>
	Buckholz	<input type="checkbox"/>	<input type="checkbox"/>	Wethington	<input type="checkbox"/>	<input type="checkbox"/>
	D'Andrea	<input type="checkbox"/>	<input type="checkbox"/>	Williamson	<input type="checkbox"/>	<input type="checkbox"/>
	Duggan	<input type="checkbox"/>	<input type="checkbox"/>	Yale	<input type="checkbox"/>	<input type="checkbox"/>
	Evans	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>	<input type="checkbox"/>
	Farrar	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>	<input type="checkbox"/>
	Heimbach	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

*please review and make
changes/sign.*



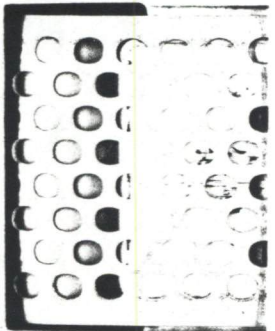
THE WHITE HOUSE
WASHINGTON

Date: June 19, 1990

TO: Juanita Duggan

FROM: **STEPHEN I. DANZANSKY**
Deputy Assistant to the President
and Director of Cabinet Affairs

Please prepare a memo from me to Grady asking for action as promised on providing a coordinative mechanism. See me for more information.



OFFICE OF CABINET AFFAIRS STAFFING MEMORANDUM

Date: 6-11-90

Due by: _____

Subject: Federal Agencies and their relationships with global climate change

From: Barry McBee

	ACTION	CONCUR	FYI		ACTION	CONCUR	FYI
BATES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	JACKSON	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DANZANSKY	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	MCBEE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ADAIR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SCHALL	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
BUCHHOLZ	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	WETHINGTON	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
D'ANDREA	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	WILLIAMSON	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
DEWITT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	YALE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DUGGAN	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EVANS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
FARRAR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HEIMBACH	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:



THE WHITE HOUSE
WASHINGTON

Steve:

Discussed the attached with Dave Gibbons. He has not pushed this concept further at all, intentionally so, on the premise that the Administration does not yet have a position that global warming exists and will have any adverse consequences, so why should we require federal entities to take note of the effects of their actions in this area? The motivation for proceeding with an executive order on this issue, which was the antecedent of this proposal, was that the Hill was about to require this anyway and this would be a "first strike". Dave notes that the Hill has lost momentum on the issue, so this rationale is weakened significantly. Dave also noted that the OMB circular process, which would be a substitute for the cumbersome executive order process, is itself not a very fast procedure and could take several months - this is a fact he may not have shared with anyone else and should be kept close hold.

Let me know if you want further info.

Barry





Office of the Assistant Attorney General

Washington, D.C. 20530

May 2, 1990

COVER MEMORANDUM

TO: Robert E. Grady
David M. Gibbons
Office of Management & Budget

THRU: C. Boyden Gray
Counsel to the President

FROM: Richard B. Stewart *RBS*
Assistant Attorney General

In light of the issues set forth in the enclosed memorandum, I believe it quite important that OMB, as agreed at our meeting of April 9, promptly initiate a process for guidance and coordination of the activities and positions of federal agencies regarding the relations between their programs and potential global climate change, or consider other avenues for such coordination. Please let me know when we can assist in this effort.

CC: D. Allan Bromley
Stephen I. Danzansky
Michael Deland
Theresa Gorman
Richard Schmalensee

OFFICE OF CABINET AFFAIRS STAFFING MEMORANDUM

Date: 6-11-90 _____

Due by: _____

Subject: Federal Agencies and their relationships with global climate change

From: Barry McBee

	ACTION	CONCUR	FYI		ACTION	CONCUR	FYI
BATES	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	JACKSON	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DANZANSKY	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	MCBEE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ADAIR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SCHALL	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
BUCHHOLZ	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	WETHINGTON	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
D'ANDREA	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	WILLIAMSON	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
DEWITT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	YALE	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DUGGAN	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EVANS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
FARRAR	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HEIMBACH	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

THE WHITE HOUSE
WASHINGTON

Steve:

Discussed the attached with Dave Gibbons. He has not pushed this concept further at all, intentionally so, on the premise that the Administration does not yet have a position that global warming exists and will have any adverse consequences, so why should we require federal entities to take note of the effects of their actions in this area? The motivation for proceeding with an executive order on this issue, which was the antecedent of this proposal, was that the Hill was about to require this anyway and this would be a "first strike". Dave notes that the Hill has lost momentum on the issue, so this rationale is weakened significantly. Dave also noted that the OMB circular process, which would be a substitute for the cumbersome executive order process, is itself not a very fast procedure and could take several months - this is a fact he may not have shared with anyone else and should be kept close hold.

Let me know if you want further info.

Barry



U.S. Department of Justice
Land and Natural Resources Division

Office of the Assistant Attorney General

Washington, D.C. 20530

May 2, 1990

COVER MEMORANDUM

TO: Robert E. Grady
David M. Gibbons
Office of Management & Budget

THRU: C. Boyden Gray
Counsel to the President

FROM: Richard B. Stewart *RBS*
Assistant Attorney General

In light of the issues set forth in the enclosed memorandum, I believe it quite important that OMB, as agreed at our meeting of April 9, promptly initiate a process for guidance and coordination of the activities and positions of federal agencies regarding the relations between their programs and potential global climate change, or consider other avenues for such coordination. Please let me know when we can assist in this effort.

CC: D. Allan Bromley
Stephen I. Danzansky
Michael Deland
Theresa Gorman
Richard Schmalensee

* FOIA Exempt -- Litigation Sensitive *

May 1, 1990

MEMORANDUM

SUBJECT: Update on Agency Evaluations of Impacts on Climate Change

The issue of potential global climate change is appearing with increasing frequency in federal agency evaluations of their programs' environmental impacts, in comments made by outside parties on those evaluations, and in litigation over such evaluations. More attention to climate change by the various federal agencies can be expected in the future.

Absent government-wide coordination, these agency evaluations will continue to proliferate and at times to diverge from one another. For example, some agencies may report that climate change will occur and is the foreseeable result of their activities, while other agencies will dispute either or both of those propositions. Disparate viewpoints among and even within agencies are already apparent. Private litigants are pressing for increased attention to climate issues in agency evaluations; courts are being asked to resolve the scientific questions. Without a coordinating guide for agencies to follow, it is relatively clear that agencies will differ in their public statements and litigating positions, unnecessarily expressing discordant views on issues of significant concern to the Administration and to the public.

In addition, it would be desirable to collect, on a coordinated basis, information and analysis which agencies have or will develop regarding the relations between their programs and global climate change. Among other matters, this material would assist in the appropriate treatment of climate change issues under NEPA, and the formulation of the U.S. position in international discussions regarding potential international agreements on climate change.

1. Pending litigation.

(a) In Foundation on Economic Trends v. Watkins, Civ. No. 89-1483-GHR (D.D.C.), plaintiffs have alleged that the programs of the Energy, Interior and Agriculture Departments are in violation of NEPA because the NEPA statements (such as Environmental Impact Statements or EISs) that were prepared for those programs failed to address the programs' possible impacts on climate change, and have not been supplemented to do so. The set of programs and NEPA documents challenged is potentially enormous; the plaintiffs have not identified them with much specificity.

The government faces several risks in this litigation.

(1) Collecting the numerous NEPA documents and, if ordered to do so, supplementing them, could be expensive and time-consuming. (2) The scientific issues of climate change -- its likelihood, its anthropogenic causes, the impacts of federal programs on climate, and the foreseeability of these events -- could be decided by the judge. Indeed, at a status conference in February, the judge remarked that there was great debate over the science of climate and that "I guess the court will have to resolve it." Other judges in similar suits in the future could be similarly emboldened. Yet the evolving and highly complex science of climate is particularly inappropriate for "resolution" by lay judges. (3) The three defendant agencies may approach the case from different perspectives. Already USDA has begun developing a statement that it wants to publish in the Federal Register as an agency-wide answer to the questions posed by this litigation, asserting that climate change is too uncertain and too distantly related to USDA activities (such as forest management) to be a foreseeable impact requiring evaluation under NEPA. DOE is likely taking a different view, having already asserted in state court lawsuits (see below) that climate change is a foreseeable outcome of individual nuclear power plant shutdowns. DOI has not yet expressed a clear view on the science. Agency statements on a high-profile issue such as climate change that are inconsistent with each other (and potentially inconsistent with other Administration statements) could prove troublesome and embarrassing; without intruding on the scientific judgments of experts, some coordination could be brought to the determinations that each agency makes on whether NEPA requires evaluation of climate impacts. (4) The court could render a variety of decisions. At worst, the court could find the NEPA documents inadequate and enjoin all further work on these programs -- that is, order the three agencies to stop all their activities -- until the NEPA documents are supplemented to the court's satisfaction. Alternatively, the court could decide to enjoin selected programs (presumably those most clearly related to impacts on climate), to require supplementation of

existing NEPA documents without an injunction, to require any new NEPA documents to consider climate, or to hold that no evaluation of climate is required at all. The court could also decide to remand the substantive issues to the agencies for hearings and review, affording the agencies the first opportunity to decide the substantive scientific questions and then leaving to the court only the question of whether the agency decision, as judged on the agency's record of hearings and opinions, was not arbitrarily reached.

The defendants' motion to dismiss the suit on standing grounds was denied on February 12, 1990. The case is now in the process of discovery. The judge instructed the parties to begin discovery promptly and to meet again in his chambers in July. We have filed our first round of discovery requests, seeking to clarify the specific programs and NEPA documents the plaintiff is challenging. We have not yet received discovery requests from the plaintiffs. We anticipate that the plaintiffs may ask us to identify all the NEPA documents that mention climate change, and then seek summary judgment as to those that do not. The question on summary judgment will likely be whether new scientific information gained since the NEPA documents were prepared raises sufficient concern about the foreseeability of climate change impacts due to the federal program to which the NEPA document relates that the agency should supplement its NEPA document. The proof and defense of this proposition could require expert witnesses such as climatologists to be questioned in depositions about the state of climate science and whether the government should examine its impacts on climate change. It is also conceivable that this case could result in a public trial at which each side, using scientific expert witnesses, argues such issues as whether climate change is foreseeable.

(b) Similar suits are likely to be brought against other programs of these and other agencies. For example, at an academic conference in February, a public interest group attorney mentioned his intention to sue the Federal Highway Administration for failure to conduct NEPA evaluations of climate change impacts.

(c) In Dollard v. Long Island Power Authority, No. 4307-89 (N.Y. Sup. Ct., County of Albany; Travers, J.), a suit in New York State court under the New York version of NEPA, the Energy Department (represented by the Civil Division of the Justice Department) has intervened to argue that the Shoreham nuclear power plant should not be shut down without an evaluation of the environmental impacts of that action. DOE has argued that New York's State Environmental Quality Review Act (SEQRA) requires consideration of the environmental impacts of shutdown including,

among others, the impacts on climate change of shifting from nuclear to fossil fuel energy generating plants. The Declaration of Deputy Secretary of Energy W. Henson Moore asserts that:

If Shoreham is completely replaced by fossil-fired plants, emissions of . . . carbon dioxide would increase. . . carbon dioxide is one of the 'greenhouse' gases that some scientists believe is a major contributor to possible global climate change. Replacement with oil-fired capacity would produce additional emissions of . . . 3 million tons of carbon dioxide . . . per year. . . There is no practical way of neutralizing the carbon dioxide emitted by a fossil-fuel plant. . . The chief concern with added carbon dioxide burden is its potential contribution to climate change. Global climate change may alter weather patterns, disrupting food crops and other vegetation, as well as negatively affecting wildlife distribution patterns. It may cause sea levels to rise, destroying coastal wetlands, valuable property, and entire communities. The effects of carbon dioxide on the atmosphere will be long lasting, because emissions result in a net accumulation. . . The damage would . . . hurt millions of people in other parts of the State and Nation.

Decl. of W. H. Moore, Aug. 11, 1989, at 6-7 pars. 8-9. Later his declaration argues:

Increased emissions of carbon dioxide from the necessary fossil-fired replacements plants will increase 'greenhouse' gases in the atmosphere. These gases have been potentially linked to adverse global climate changes, including global warming, as discussed in paragraphs 8 [quantifying carbon dioxide emissions] and 9 [describing harms of climate change].

Decl. of W. H. Moore, Aug. 11, 1989, at 15-16 par. 22. Moore therefore asks the court to require evaluation of these impacts under SEQRA. The claims made against DOE by the plaintiffs in FOET v. Watkins (above) are substantially the same: that DOE programs, such as the Fossil Energy Program and the Clean Coal Technology program, add carbon dioxide to the atmosphere and therefore must be evaluated under NEPA.

(d) DOE has also made a similar statement to the state court in New Hampshire in an effort to dissuade the court from staying the issuance of a full power license to operate the Seabrook nuclear power plant. DOE argues in a declaration by Secretary of Energy James D. Watkins that among the environmental impacts of a stay would be continued emissions of carbon dioxide from fossil energy sources, "which is one of the 'greenhouse' gases that some scientists believe is a contributor to possible

global climate change." Decl. of J. Watkins, March 9, 1990 at 7.

2. Agency comments on other agencies' NEPA statements.

Offices of the U.S. Forest Service proposing individual timber sales have been informed by regional offices of the EPA that the NEPA statement to be issued in connection with the timber sale should address the impacts on climate change of cutting the timber. Under NEPA and its case law, the EPA comments require a response by the Forest Service; EPA's comments could give aid and comfort to private litigants seeking to block timber sales. The Forest Service is concerned that evaluations would be inappropriate under NEPA because the impact of individual timber sales on ultimate climate change phenomena is not foreseeable.

3. Evaluations undertaken voluntarily by agencies.

As described above in connection with the FOET case, the Department of Agriculture is developing a statement for possible publication in the Federal Register. The statement would describe the current state of scientific understanding of climate change and the relation of human activities to climate change. The statement would argue that the science is too uncertain to link individual projects (such as forest timber sales) to foreseeable impacts on global climate, and that any consideration of climate impacts would therefore need to be program-wide or possibly agency-wide. The statement would also describe USDA programs relevant to climate, including research on the ability of trees to sequester carbon and the ability of crops to adapt to climate change.

The National Highway Traffic and Safety Administration (NHTSA) of the Department of Transportation, as part of its upcoming programmatic EIS for its rulemakings under the Corporate Average Fuel Economy (CAFE) program, is planning to evaluate the impacts of the CAFE program on emissions of greenhouse gases, chiefly carbon dioxide. In each of its last two environmental assessments of CAFE rules, covering 1992-94 models of light trucks (published in 1990) and 1989-90 models of automobiles (1988), NHTSA made an estimate of the carbon dioxide emissions that would be entailed by the rulemaking.

The Department of Energy's Bonneville Power Administration will apparently address potential climate change

impacts of its "Non-Treaty Storage Agreement" in a forthcoming environmental assessment. DOE has also indicated its intention to address climate change in forthcoming NEPA documents. (We have also heard that the Department of Energy may be considering conducting a full agency-wide environmental review of all its activities, ostensibly pursuant to NEPA; it is not yet clear whether that review would cover potential impacts on climate.)

4. Extraterritorial Application of Environmental Impact Assessments

Efforts are underway on several fronts to expand the requirements of environmental impact assessments pertaining to projects with environmental impacts outside the United States. Under Executive Order 12114, which requires federal agencies to examine the environmental impacts abroad of their major federal actions, the main requirements of NEPA are already applicable to many extraterritorial impacts. EO 12114 contains reservations that limit its scope: for example, it provides that "votes and other actions in international conferences and organizations" are exempt from its coverage, and states that "nothing in this Order shall be construed to create a cause of action."

Congress is considering legislation to codify and expand those requirements. For example, H.R. 1113, which would make NEPA formally applicable to major federal actions having extraterritorial impacts, has passed the House and a related bill is soon to be considered by the Senate (S. 1089). H.R. 1113 would require CEQ to promulgate regulations providing guidance for agencies to assess the effects, including cumulative effects, of federal actions on "matters of international environmental concern" including global climate change, ozone layer depletion, loss of biological diversity, and transboundary pollution. H.R. 1113 as passed contains no exemptions for votes in international fora, although it does provide that the regulations issued by CEQ "shall be consistent with the national security and foreign policy of the United States." Thus, H.R. 1113 might arguably give rise to the challenge that an environmental impact review should be undertaken prior to development or negotiation of a U.S. position on global climate change. It may also raise other concerns, including constitutional questions to the extent that the bill purports to regulate the President's exercise abroad of inherent Executive authority. (The provisions of concern in H.R. 1113 have recently been incorporated into section 505 of H.R. 3847, the Department of the Environment bill in the House.) In a related development, Public Law 101-240 (formerly H.R. 2494) amends the International Financial Institutions Act, 22 U.S.C. §§ 262m et seq., to require an environmental assessment prior to any vote by the U.S. Executive Director of a multilateral development

bank in favor of any action which would have a significant effect on the human environment. H.R. 3977 would also extend NEPA to Antarctica.

The Administration is considering suggesting that, as an alternative to new legislation such as H.R. 1113, EO 12114 be broadened instead. CEQ has recently convened an Interagency Task Force on extraterritorial application of NEPA to review EO 12114 and to try to achieve a clear Administration position before S. 1089 and H.R. 1113 pass the full Congress.

Meanwhile, international bodies are considering expanding the requirements of environmental impact assessment. The UN Economic Commission for Europe is working toward an international convention on environmental impact assessments. The ECE convention has recently been narrowed to focus on transboundary impact assessment of projects located close to national borders. As a member of the ECE, the United States is participating in these negotiations. There is also likely to be discussion of environmental impact requirements in the international negotiations of treaties on Antarctica.

All of these developments could enlarge the duty of federal agencies to assess the impacts of their programs on extraterritorial environmental media, including global climate.

THE WHITE HOUSE
WASHINGTON, DC

Date: 6/11

TO: Holly Williamson

FROM: BQM

	ACTION	CONCUR	FYI		ACTION	CONCUR	FYI
Bates	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Jackson	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Danzansky	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	McBee	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Adair	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Schall	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Buchholz	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Wethington	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
D'Andrea	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Williamson	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
DeWitt	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Yale	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Duggan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Evans	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Farrar	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Heimbach	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

URGENT

BY NOON

C.O.B.

Comments: