



Institute for
Policy Integrity
NEW YORK UNIVERSITY SCHOOL OF LAW



June 19, 2018

To: Bureau of Land Management

Subject: Quantifying and Monetizing Greenhouse Gas Emissions from the Coastal Plain Oil and Gas Leasing Program

Submitted by: Environmental Defense Fund, Institute for Policy Integrity at New York University School of Law, Montana Environmental Information Center, Sierra Club, and Union of Concerned Scientists

Our organizations respectfully submit these comments on the need to quantify and monetize greenhouse gas emissions from any oil and gas exploration, development, production, transportation, and combustion resulting from any potential leasing in the Coastal Plain. Our organizations may separately and independently submit additional comments during the scoping process on other issues, impacts, and alternatives to be considered during the preparation of the environmental impact statement.

Quantification of greenhouse gas emissions entails undertaking a reasonable and thorough analysis, based on the best available information, of the significant emissions of carbon dioxide, methane, nitrous oxide, and other climate-forcing pollutants from any foreseeable exploration, extraction, processing, transportation, and ultimate combustion of oil and gas under the Coastal Plain Leasing Program. To quantify emissions accurately, the Bureau of Land Management should also undertake a reasonable analysis of energy substitution effects, including how an increased supply of oil and gas under this leasing program may increase demand for oil and gas at the expense of energy conservation or renewable energy sources.

Monetization of the climate damages caused by this leasing program's greenhouse gas emissions requires using the best available metrics for the social cost of carbon, the social cost of methane, and the social cost of nitrous oxide. The best available metrics currently are the 2016 estimates developed by the Interagency Working Group on the Social Cost of Greenhouse Gases, as reviewed by the National Academies of Sciences. These metrics capture many, but not all, of the most important categories of climate damages from greenhouse gas emissions, including property lost to sea-level rise, increased coastal storm damage, changes in agricultural output and forestry, changes in energy demand, changes in heat-related illnesses and some disease vectors, changes in fresh water availability, and some general measures of catastrophic and ecosystem impacts.

For more information on why the Interagency Working Group's 2016 estimates of the social cost of greenhouse gases remain the best available metrics, please see, for example, the comments that our organizations recently submitted to the Bureau of Land Management on the Greater Mooses Tooth 2 Development draft environmental impact statement.¹

¹ Available at

http://policyintegrity.org/documents/Joint_SCC_Comments_to_BLM_on_Greater_Mooses_Tooth_051718.pdf.

Sincerely,

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*No part of this document purports to reflect the views, if any, of New York University School of Law.