

THE DAILY RECORD

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Is there a local solution to the global climate change problem?

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Regardless as to whether you accept the science that global warming is a consequence of human activity, there is no denying climate change has emerged as the pre-eminent environmental issue of the 21st century.

What other environmental issue has ever inspired an Oscar and a Nobel Prize in the same year? There have been a fair number of pollution-themed movies made in the past 40 years, and some Oscars, but never a Nobel Prize.

Despite the cause celebre status of global warming, the federal government has been a non-participant on the world stage and has done little to address the issue at home except to encourage alternative fuels and voluntary reductions in the emission of greenhouse gases (GHGs).

In the absence of a federal program, various states have stepped in with a patchwork of regulations designed to curb GHG emissions. New York is a ringleader of one of the most ambitious efforts, the Regional Greenhouse Gas Initiative, which is a multi-state effort to reduce carbon dioxide emissions from power plants.

Along the way, it has occurred to some enterprising thinkers that we could launch a truly grassroots effort to address climate change by using a tool already at hand, the State Environmental Quality Review Act (SEQRA), to inspire local consideration, and mitigation, of the global impacts of additional greenhouse gas emissions.

Since the 1970s, SEQRA has required all levels of government to identify and consider environmental impacts from their actions and approvals. If significant adverse environmental impacts are identified, an environmental impact statement (EIS) must be prepared. Projects requiring EISs cannot be approved until the environmental impacts are thoroughly studied and the agency makes the finding that significant environmental impacts have been avoided or

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mitigated to the maximum extent practicable.

One of the pillars of SEQRA is that it delegates to an agency the additional authority to impose conditions deemed necessary to avoid or minimize environmental impacts. SEQRA is guided by the Department of Environmental Conservation, but is implemented directly by thousands of local boards throughout the state.

Advocates of making global warming a factor in local decision-making point out that EISs should discuss a proposed project's effects on the use and conservation of energy resources, "where applicable and significant," and consider a project's effects on air pollution. Since the main source of GHGs is the use of energy, and since the U.S. Supreme Court has declared the most important of those, carbon dioxide, to be a pollutant, advocates argue the framework

already exists in SEQRA to require consideration of climate change in EISs.

Even if you accept the theory, is it wise public policy? Does it make sense to encourage every town and village in the state to develop their own climate change policies on a case-by-case basis as they consider subdivisions and site plans?

SEQRA works best as an adaptive tool local boards can use to study and mitigate or avoid significant local environmental impacts. The accepted focus of SEQRA is on changes to the project area and the surrounding community. Local boards traditionally concern themselves with impacts such as traffic, noise, viewshed, drainage, water usage, historic preservation and changes in community character. On these topics, they have the most expertise or first-hand experience. It appears to make little sense to expect local officials to evaluate global environmental impacts or to encourage a patchwork of local policies and regulation.

A typical individual project does not generate enough

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greenhouse gas emissions to influence global climate change; the issue is, by definition, a cumulative environmental impact from many sources. Undoubtedly, every reduction in the emission of GHGs is a positive step, but these are macroeconomic issues and regulation should be

coordinated on a much larger scale to ensure fairness and consistency in meeting the burdens of reducing GHGs.

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