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**Folder Title:**  
CEQ [Council on Environmental Quality] - Elkind - Climate Change Action Plan March 15, 1993

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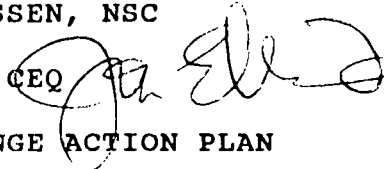
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EXECUTIVE OFFICE OF THE PRESIDENT  
COUNCIL ON ENVIRONMENTAL QUALITY  
WASHINGTON, D.C. 20503

March 15, 1993

MEMORANDUM FOR KATIE MCGINTY, OEP  
EILEEN CLAUSSEN, NSC

FROM: JON ELKIND, CEQ   
SUBJECT: CLIMATE CHANGE ACTION PLAN

**BACKGROUND:** Monday, March 8, was the closing date for a 3-month comment period on the draft U.S. National Action Plan (USNAP) on climate change. The draft USNAP was produced through a process run by the Department of State. CEQ published the Federal Register notice and served as the agency for receipt of comments.

Forty-four sets of comments were received (see attachment), and in the next few days I will transit copies of all comments to both of you, to the Department of State, and to agency contact people taking part in the NSC-12 review of climate policy. In addition, I will complete and send you a digest of the comments.

CEQ has received requests from commenting organizations and the press for copies of the comments. I have indicated that such access may indeed be possible but have not prejudged this matter, pending consideration and decision at your level.

**ISSUE:** Should copies of public comments on USNAP be made available? If so, who should distribute the sets of comments to those requesting them? When should this happen?

**RECOMMENDATION:** That CEQ ensure distribution of comments to Administration officials currently reviewing climate policy, and then as quickly as possible send out the comments to any member of the public who requests them.

**RATIONALE:** The purpose for drawing NGOs into a review of U.S. climate change policy was to involve them in the decision-making process in a manner consistent with traditional U.S. practices; such involvement was expected to help generate the type of educated public debate which often proves essential to resolution of multi-faceted matters.

Allowing public access to the entire body of comments would further these goals. Attempting to deny access would run counter to them. Furthermore, CEQ's General Counsel indicates that in any event FOIA would render all the comments accessible to any member of the public who filed a request.

Concur \_\_\_\_\_ Do not concur \_\_\_\_\_

cc: Dinah Bear, Patricia Bliss-Guest

COMMENTS ON USNAP

(in order received by CEQ)

Union Electric (Jerrel D. Smith)  
US Environmental Training Institute (Edith Cecil)  
World Wildlife Fund (T.J. Glauthier)  
Natural Resources Defense Council (Dan Lashof)  
Clean Coal Technology Coalition (Ben Yamagata)  
Oglethorpe Power Corporation (Boyd Vaughan)  
Electric Power Research Institute (Kurt Yeager)  
American Petroleum Institute (G. William Frick)  
Southern Company Services (Charles H. Goodman)  
East River Electric Power Cooperative (Jeffrey Nelson)  
Buckeye Power, Inc. (Richard Byrne)  
Western Montana Electric Generating and Transmission Cooperative,  
Inc. (Ronald Wilkerson)  
Pacific Northwest Generating Cooperative (David Piper)  
Ohio Edison (Daniel Steen)  
Plains Electric Generation and Transmission Cooperative (Win  
Curtiss)  
Center for International Environmental Law (Don Goldberg),  
Environment and Energy Study Institute (Carol Werner),  
Environmental Defense Fund (Scott Hajost), Institute for  
Transportation and Development Policy (Walter Hook), Natural  
Resources Defense Council (Dan Lashof), Union of Concerned  
Scientists (Alden Meyer), U.S. Public Interest Research  
Group (Anna Aurilio), and World Wildlife Fund (T.J.  
Glauthier)  
The Climate Council (Donald Pearlman), Association of American  
Railroads, Edison Electric Institute, and the National Coal  
Association  
American Gas Association (Phyllis B. Levine)  
Business Council for a Sustainable Energy Future (John Hemphill)  
Cooperative Power Association (Julian Brix)  
Institute for Agriculture and Trade Policy  
Associated Electric Cooperative, Inc. (James Jura)  
Central Electric Power Cooperative (Donald Shaw)  
Minnkota Power Cooperative, Inc. (David Loer)  
Alliance for Responsible CFC Policy (Kevin Fay)  
Alliance for Acid Rain Control and Energy Policy (Gov. Mike  
Sullivan and Gov. Tommy Thompson)  
Air Conditioning and Refrigeration Institute (Arnold Braswell)  
Texas Utilities Services (Richard L. White)  
Florida Power and Light Company (Nancy Roen)  
American Automobile Manufacturers Association (Thomas J. Carr)  
Edison Electric Institute (Robert Beck)  
Global Climate Coalition (John Shlaes)  
Tri-State Generation and Transmission Association (Frank Knutson)  
Hoosier Energy Rural Electric Cooperative (Virgil E. Peterson)  
National Rural Electric Cooperative Association (Bob Bergland)  
Soyland Power Cooperative, Inc. (Kent Wick)  
Old Dominion Electric Cooperative (Edward Tatum)  
South Carolina Electric and Gas Co. (J.W. Preston)

Western Regional Council (Daniel Berube)  
RainForest ReGeneration Institute (Robert Randall)  
Dairyland Power Cooperative (William L. Berg)  
Seminole Electric Cooperative Inc. (William C. Walbridge)

3/15/93