

350 Seattle
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Rachel Assink
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Dear Ms. Assink,

Thank you for the opportunity to provide comment on proposed draft amendments to WAC 172-441 - GHG emissions inventory. We appreciate the informal comment process being used by the agency.

350 Seattle is concerned that greenhouse gas leakage from storage facilities and supply pipelines isn't adequately included in the GHG reporting.

We expect [173-445 WAC, Greenhouse gas Assessment for Projects](#), will account for the upstream and downstream emissions from large projects, including pipeline leakage. But that is for new projects.

The Utilities and Transportation Commission is collecting an inventory of pipeline gas leaks through their program, [Annual Leak Reporting, RCW 81.88.160](#). The defining statute directs the UTC to tell Ecology about the reported leaks, but it isn't clear what Ecology is to do with the information.

As Ecology is aware, methane leakage is of urgent concern given its severe short-term impact on climate warming. The 2020 leak totals reported by the UTC are only .03 tons less than the 25,000 metric ton threshold for a covered emitter under the Climate Commitment Act. We find that very concerning.

If such fugitive emissions are not subject to the Climate Commitment Act, Ecology should make that known to legislators so that new statutes can be drafted to account for and mitigate them.

Thank you for your important work,

David Perk
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