

Erin Anderson

Emissions - Indirect

Great--two brief comments. One, I concur with the prior speaker. I think that if you're going to go forward with a rule that is going to include upstream emissions, A, that those upstream missions need to be looked at extensively not just electricity and concrete, there are all sorts of emissions that go into upstream activities and picking on a few select aspects of that will artificially result in presentation of certain kinds of impacts while ignoring others and I don't think that that is equitable or fair.

Mitigation

I think the rule, if you go forward, also must require an evaluation of whether the upstream GHG emissions have already been mitigated by another agency, or another country, state, or region with authority, simply counting them without looking at whether they have been already mitigated results in the double counting.

Mitigation

Last, I have concerns about the rule demanding or strictly prescribing mitigation measures. SEPA is a matter that is led by the respective agencies. And, particularly when we're talking about substantive authority, there should be significant latitude and discretion to the lead agency who is most familiar with the proposal they are evaluating. Dictating certain kinds of or measures of mitigation in a rule seems (appropriate?) to me, I would hope that the agency would be more open minded about this. Thank you.