

# Earthjustice

Hello everyone. My name is Amanda Goodin and I'm an attorney with Earthjustice. But again, I'd like to thank the Department of Ecology for the chance to participate today. I'd like to comment on several aspects of the rule's application. First, the focus of this rule should be the largest, most polluting projects. Second, the rule needs to be applied in a way that incorporates the latest science. And third, we need this rule more than ever in light of the federal failure to analyze and regulate greenhouse gas emissions.

So first, the focus of this rule is large fossil fuel and industrial projects and that's the right focus. Facilities like LNG and methanol terminals, petrochemical facilities, and energy intensive industrial projects cause tens of millions of tons of greenhouse gas emissions every year. We've seen a number of assessments for massive projects recently that have not disclosed their full carbon footprint. That's a huge problem. For example, we've seen some project proponents attempt to avoid disclosing the massive downstream emissions caused by their products end use. We can't make good decisions based on bad information. We need to understand the full scope of these projects' carbon footprint before considering new infrastructure investments. This is especially important since large fossil fuel and industrial projects typically have lifespans measured in decades. We have to avoid locking ourselves in unsustainable levels of greenhouse gas emissions. Massive fossil fuel and industrial projects threaten to derail the State's progress on climate goals. Focusing this rule on the largest and most polluting facilities is what we need to do.

Second, this rule needs to be applied in a way that incorporates the latest science. It's critical that major projects use the most up to date science to estimate every aspect of their emissions. So, for example, the rule should not establish a value from methane leakage that would apply to every project going forward. Instead the rules should establish parameters for how to calculate the methane leakage rate for a project. As science progresses, we frequently learn that emissions are even greater than initially thought. The rule must require the analysis for individual projects to incorporate the latest science. This includes new science that post-dates this rule's publication. It's also important to ensure that the parameters set by the rule guard against underestimating emissions. Where science is still evolving, the rule should require a margin of error to be sure that we don't lock in decades of emissions that are higher than the analysis revealed.

And third, this rule is especially important in light of the federal government's complete failure to respond to our climate crisis. The federal government is instead taking steps to weaken the environmental assessment of greenhouse gas emissions, and to promote increased reliance on fossil fuels. It is critical that state step up to fill this void. State agencies and local governments need the best information to make the best decisions. That information is not going to come from any federal requirements.

Washington needs to lead by establishing science driven requirements for environmental assessments of greenhouse gas emissions. We need this rule to establish clear and comprehensive requirements and we need those requirements soon so that we don't have any more major project proposals, based on half-baked analysis. Thank you again for the chance to participate today.

