Earthjustice

Good morning. And I'd like to thank the Department of Ecology again for the opportunity to participate and this development of this critical role. There are a few issues relevant to methodology and the environmental assessment methodology that I'd like to touch on.

The first and most important issue I'd like to address is a climate test. On major fossil fuel and industrial projects, every environmental analysis must include a climate test. In the broadest sense, this climate test should help decision makers answer the question--is this project a part of a low carbon future? To answer that question, the analysis must look at lifecycle greenhouse gas emissions in context. There are at least three different frameworks that must be part of this content.

First, the climate task has to include greenhouse gas emission reduction targets, based in both law and science. Looking at a project submissions against the baseline of emissions today is not enough. We need to judge a project's emissions against the baseline of the major reductions we need in decades to come.

As the second part of this climate test, the environmental analysis must also compare the proposed project, (to?) the lifecycle greenhouse gas emissions, or alternative products or processes that serve the same broad purpose. This must include both established and emerging products and technology. This will help show whether a given project is truly the greenest of it's kind or whether it is locking in dirty technology.

Finally, the climate test must require an analysis of how the project then to projections for a deeply de-carbonized economy. Before we come to new infrastructure that will be with us for decades, we need to understand what trade-offs we are committing to if those emissions continue. We also need this information to understand the risk that the project will lead to stranded assets.

Requiring a robust climate test, as part of every environmental analysis for major fossil fuel and industrial projects is critical. We can't make good decisions unless we know whether a project is consistent with the low carbon economy we must build.

I also want to briefly touch on the question of gross emissions versus net emissions that the Department of Ecology raised earlier. We've seen a lot of net emission analyses that have been speculative and incomplete at best. These analyses often rely on claims that a product will allegedly displace a dirtier alternative. But there's no way to reliably predict whether a given product will displace a dirtier product or whether it will displace a cleaner one.

There's also no way to reliably predict whether a new product will displace another source or whether it will simply be additive. Gross lifecycle emissions can be calculated with a high degree of certainty. Net emissions can't be. We can't rely on half-baked analysis to justify major, new polluting product. Thank you. Again for the chance to provide input today.