

# Western States Petroleum Association

Bob Poole with the Western States Petroleum Association, a couple of request going back. Obviously you, you're not going to be able to respond today, but we'd like you to address some issues. One of them particularly has to do with the general category of applicability and kind of a subset to that, the issue of inducement. And one of the areas, for example, use housing projects are being excluded. But what about an expansion of the utilities, for example, to serve those housing projects? That really, the inducement issue you know, some of these projects clearly represent a significant amount of land development and therefore increased utilization of utilities, in this case with power, natural gas usage, etc. So the inducement issue is one that we wanted to bring forward. And then to clarify a little further, while the rule covers fossil fuel projects and industrial projects with regard to industrial projects, we'd really like to understand more clearly what's being included there? What's being excluded? Both in the private and public sector. And for example, are airport expansions included? Stadiums? Natural gas pipelines including local service delivery lines? School district projects? Just to give you a sampling. High rise buildings? Obviously, you're gone have the inducement factor going on with a lot of these projects. New industrial parks? Stayed office buildings? And that brings to another issue, when or if are public projects going to be included in this? It seems as though there's a distinction there that kind of differentiates from their relative to SEPA.

So, it seems that in summary the GAP rule discriminates against private party projects versus public, and yet SEPA doesn't do that. So we'd like to have some information on explanation around that. And speaking of SEPA, it seems as though with the inclusion of the life cycle analysis, what occurs to us, the effective 10K threshold, while it's a significant trigger accounting for the indirect source issues relative to the energy supply analyses, etc.; it seems like that you're effectively looking at a separate nontraditional SEPA process by imposing these dynamics. So those are some of the thoughts I have relative to input in this area, and hopefully we can get some feedback at a point on some of these more global issues.

And in closing we'd like more information on how the GAP could be more flexible with the life cycle analysis. Thank you.