

# Therese Livella

## Environmental Assessment Questions

Are there special considerations we should take into account for projects that may lack a central facility or clear “on site” emissions (e.g., linear projects)? They should be subject to strict review and mitigation. A pipeline has a beginning and an end. It does not exist in a bubble. So, if its end point is connected to a new facility it should be considered part of the new facility. If a pipeline is built to expand production for an existing or future facility, the pipeline rules (linear projects) should take all GHG, pollution and mitigation into consideration at the time of permitting. NO LOOPHOLES!

Is it more important to focus on the net emissions or on the gross emissions of a project? What should be the role of global economic analysis (e.g., developing a project global supply and demand curve) in the assessment? Net. Taking global supply and demand into consideration is useful but is only part of the assessment. It is impossible to predict what new technology may emerge in 40-50 years or how the prices may fluctuate.

What should the role of economics play in the Energy Analysis? Is it enough to note where supplies of energy will change, or should the price effects of those changes feed into a dynamic price model (or similar analyses)? It is useful to consider economics but those are just projections. The environmental impacts are certain. Those should be valued higher.

What should the time period for the assessment be? Under SEPA, the analysis usually considers the typical operational lifespan of a project and construction but the time period could be longer to align with the GHG emission limits, or for other reasons. The time period should be the entire life span of the project from construction all the way through to cleanup afterward. I am so very tired of superfund sites paid for by the American people. If we knew the true cost of fossil fuels we may choose conservation on our own.

Should the rule identify starting and ending points of the life cycle analysis for project inputs and outputs? This could be at specific points, or the rule could provide more general direction, depending on the project type. The time period should be the entire life span of the project from construction all the way through to cleanup afterward. I am so very tired of superfund sites paid for by the American people. If we knew the true cost of fossil fuels we may choose conservation on our own.

At what point should the analysis terminate downstream? Should the first potential use be included in the life cycle analysis as the end point? The time period should be the entire life span of the project from construction all the way through to cleanup afterward. I am so very tired of superfund sites paid for by the American people. If we knew the true cost of fossil fuels we may choose conservation on our own.

For example, in the case of fossil fuels the combustion of that fuel if some other use is not known, or if the first potential use is not demonstrable? The most environmentally harmful use of the fuel should be used when making calculations. As we have seen with NWIW, unscrupulous companies

will change their plans based on mood of the moment just to get a permit. This is why mitigation efforts must be made in advance.

For non-fossil fuel products should the first potential use be considered to be the first use, or analyzed as multiple uses, or a final end use of the product? It is acceptable to analyze multiple uses however, any permits and mitigation should be based off the worst case scenario. If the company and the public still want to proceed and it can be proven that the project is not as environmentally harmful as predicted, then efforts to reimburse the company can be made. The environment and the public have footed the bill for corporations long enough.

## Mitigation Questions

What types of emission should mitigation address? On-site emissions, in-state emissions (on-site, upstream and downstream), upstream out-of-state emissions? All of it. These large energy projects specifically choose certain areas because of lax restrictions. The time for the public and the environment paying for the hidden costs of these projects is done. The state who issues the building permits must take the responsibility to ensure the project progresses in an ethical manner.

The Washington State Legislature has established GHG reduction goals for the future; how should these GHG reduction goals influence the mitigation plan? They should be a central point along with other major pollutants and quality of life issues.

Should mitigation vary for different types of projects, such as factories, export facilities, or linear projects like pipelines or electricity lines? No. They are all part of the project. If a company spots a loop hole they will exploit it. NO LOOPHOLES!

If the environmental assessment includes a net emissions analysis, how should this be treated in the mitigation plan? Mitigation based on net emissions should happen before any building permits are issued. If it is determined later that the company has over mitigated, public reimbursement could be considered.

How should emissions involving projects that modify an existing facility be calculated? As transparently as possible.

What process should be used to track and verify emissions subject to mitigation? The results/progress should be made public.

How would changes to calculation methods or emissions be handled? Through a public process.

How should mitigation projects be prioritized? The public should have the final say as to whether a mitigation project is approved. Because basically a mitigation project is saying "we are willing to trade this thing for that thing". If I have learned anything through the years of following environmental and political issues, it is that the more points of view you hear, the more informed your decision can be. If we did not have such a well informed group of citizen activists in this state, we would have total environmental collapse already.

Are there types of mitigation projects which should or should not be included? Absolutely no cap and trade. Mitigation projects must be fully completed prior to the start of any construction permits for new facilities. For current facilities seeking to mitigate, those efforts must be subject to a citizen process to be sure that all voices have been heard. Mitigation efforts must be meaningful to the community in which the facility is located and/or where the upstream/downstream effects are felt the most.