## James Graves

I'm hoping that someone can shed light on the following general question about applicability of the rule:

I'm clear on these two points:

If facility emissions are equal to or greater than 10,000 metric tons of CO2e per year, the GAP Rule applies to the project and the greenhouse gas assessment described in the rule must be done. If a project's facility GHG emissions are less than 10,000 metric tons of CO2e, then consider inputs and outputs to the project.

But with respect to this point:

If a single input or output, or a combination of multiple inputs or outputs, are > 10,000 metric tons of CO2e, the GAP Rule applies to the project and the greenhouse gas assessment described in the rule must be done

The plain language suggests that this input/output analysis is a separate analysis and comparison to 10,000 MT CO2e – separate from, and not additive to, the analysis regarding facility emissions. Is that correct? Or are the input/output numbers added to facility emissions numbers and then compared to 10,000?

E.g., Let's say a project would have facility emissions of 9,000. Do you start at 9,000 or 0 when counting GHGs from inputs and outputs?

Lastly, to what extent will Ecology have discretion, project by project, in discerning the appropriate scope of inputs/outputs to consider – versus the criteria for identifying inputs/outputs being clearly set in the regulation?