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- 1. The environmental assessment shouldn't analyze "how the project could change energy flows or uses" but instead how the project could increase/impact GHG emissions from energy flows or uses. SEPA after all focuses on impacts, and not benefits (which could be inferred from using the word "change".)
- 2. Mitigations shouldn't be "decreased or eliminated based on the projects' contribution to a future decarbonized economy." The normal SEPA process would account for projects that contribute to decarbonization through the cumulative analysis. A project should be subject to any appropriate mitigation measures for its direct and indirect impacts; and a decarbonization project would appropriately not result in cumulative impacts--and therefore would not have any cumulative impact mitigation measures.
- 3. The GHG emissions that should be included in the mitigation plan are all that can be reasonably attributed to the project. That should include, if appropriate, all inputs, in- and out-of-state emissions, and upstream/downstream emissions. Otherwise the impact analysis will have major information gaps.
- 4. There's no need to create a special category for decarbonization projects. If these trigger the screening criteria, then their GHG impacts should be evaluated. Simply because they don't have cumulative impacts (i.e. through supporting decarbonization), doesn't mean that their direct or indirect impacts are any less relevant.