

Washington Public Ports Association

Thank you. I appreciate it. It's good to be here again today it's something this, this rule is an issue that the Washington Public Ports Association and our members care a great deal about. I think my comment is that it's not clear why we would regulate some greenhouse gas emissions or, excuse me, not regulate, but would provide guidance about how to evaluate some greenhouse gas emissions and not others. A greenhouse gas is a greenhouse gas, and if a project emits it, they are subject--if there is opposition to their action or non-project action--to litigation, and having a guidance from our states regulatory agency in place about how to do the analysis and what kinds of mitigation would be appropriate, we believe is good public policy. And particularly at a time, when climate and carbon emissions are so much in people's minds, and at the forefront for the, the defining environmental issue that that faces us today--certainly the biggest one. We agree that science is important. We agree that it's important to have the rule in place, but we do think it should be much more broadly available and we'd like to have a clear explanation for, or the reasoning that ecology used to decide that it wasn't appropriate in this rule. And I think, you know, if you think about project examples, it's not clear why state highways would be exempted from a SEPA analysis--they emit gases and, you know, they're subject to litigation. What if there's a new expanded project at a port facility and similarly, if they emit gases, they may be subject to litigation. Having guidance about how to do the analysis and how to do mitigation is something that is appropriate and very useful for ecology to provide to the public. Thank you.