

Association of Washington Businesses

AWB also appreciates the opportunity and Ecology inviting a business perspective starting this rulemaking and throughout it. We do look forward to participating in a constructive and positive manner throughout the process and our members are committed to reducing their GHG emissions. Currently many of our members have made significant investments to help lower our mission profiles and continue to work hard to do so. So we also see value and creating a framework which helps streamline the permitting process for businesses by creating a clear standard for how future greenhouse gas emissions will be accounted for. There are a few areas in which we feel are important to address for the new rule in order for it to be workable, achievable, not impose burdensome costs on businesses and the state. We'll go over a few points, which the state business committee would like to see addressed and the final rule might contain.

First point is release a working draft before the formal release of CR102. We believe an ongoing dialogue between the stakeholder community and Ecology would provide (work?) immediate feedback as the rulemaking process advances and allow for a more refined product when CR102 is released.

We also think we should align emission factors with existing rules. The final rule should use the same GHG emission factors that are currently used in EPA and other state GHG reporting rules to help streamline the reporting to state and public agencies. (Inaudible)...required the need for clear mitigation guidances for, for compliance and (inaudible) the goals to be achievable and realistic in terms of achieving the state greenhouse gas emission goals. These goals should be, again...mindful of the ability of, of a certain (inaudible)...project to meet those, state to meet those goals. Excuse me.

A consideration of the impact of leakage in the overall impact of the global greenhouse gas emissions outside the borders state, AWB believes that shifting our emissions out of the state is not in the best interest of either the climate or our state. We'd like to see a de minimis level for emissions, below which carbon emissions from projects are not impacted by this rule.

The allowance of the best available control technology as a mitigation pathway for future projects. Uh, responsible growth allowance...encouraging responsible growth...we'd like to see the department evaluate the mitigation of greenhouse gas emissions on a greenhouse gas intensity basis.

And finally, a limit of the geographic scope of secondary emissions. Similar to the offshore boundary definition of the Clean Air Rule...the scope of secondary emissions should be limited to Washington State borders and offshore waters to under state controls, which is three or five miles, as opposed to 200...(inaudible).

Again, we appreciate the opportunity to provide input and look forward to our participating as these webinars move forward. Thank you.