

Resources for Sustainable Communities in Whatcom County

Hi, my name is Eddie Urie I'm the climate and energy policy manager at Resources for Sustainable Communities in Whatcom County. First off, am very glad to see this rulemaking. I think it'll best serve, both environmental advocacy and public health interests along with the interest of project proponents and industry to have clarity on these rules, which we've seen much inconsistency in, over the last decade, especially with many appeals and litigation over analyses. In addition to supporting and agreeing with comments made by Earthjustice, I just wanted to highlight a couple of key areas that may be addressed in this rulemaking and just highlight the importance. One is threshold determination and then I'll speak briefly about mitigation. When it comes to determining significance and considering cumulative impacts, and often the case with existing industries, it's merely the county making an analysis. When determining significance, when we're talking about some of the largest polluting, climate polluting industries in the state, we shouldn't... Measuring increases proportional to their existing baseline may seem, you know, it can be a rationale we've seen that leads to a determination of non-significance when, in fact, we believe that any--if we're talking about a large emission source--any increase above that should be considered automatically significant. And when we're talking about mitigation analysis,

I'll give an example of where we've had problems--with the refinery upgrade in Skagit County a few years ago, the EIS, basically counted plastic that would be manufactured from a petrochemical product as carbon sequestered and that was inappropriate for reasons I don't have time to explain, but when we're talking about mitigation, this should be separated from the cumulative analysis an incumbent upon industries to invest in measurable reductions in pollution.