

# ENVIRONMENTAL - TREES & FISH

## GREENHOUSE GASES

These pages are to assist you in navigating the chapter that deals with the environment and greenhouse gases. You can view the complete text at [energizeeastsideeis.org](http://energizeeastsideeis.org).  
*Suggestion: go to Individual Phase 2 Draft EIS Files and click on the Chapter and specific Section you are interested in.*

### Chapter 3.5.1

- What about the affect of the lost trees? ( The loss of trees canopy is covered in Chapter 3.3 and 3.4.)

### Chapter 3.5.3

- Which are 'Partner Cities'? The term is not defined
- Chapter 173-441 requires reporting for facilities emitting more than 10000 metric tons of CO2e, NOT just GHG as stated. This is a potentially huge difference given the differences in GH effects of different GHGs.

(<http://apps.leg.wa.gov/WAC/default.aspx?cite=173-441-030>)

- “The Council on Environmental Quality (CEQ) has withdrawn its final guidance for Federal agencies on how to consider greenhouse gas emissions and the effects of climate change in National Environmental Policy Act (NEPA) reviews, a Notice of Availability for which was published on August 5, 2016 ([81 FR 51866](https://www.federalregister.gov/documents/2016/08/05/2016-15866)). As explained in the Notice of Availability, the withdrawn guidance was not a regulation. Pursuant to Executive Order 13783, “[Promoting Energy Independence and Economic Growth](https://www.federalregister.gov/documents/2017/03/28/2017-05833),” of March 28, 2017, the guidance has been withdrawn for further consideration.”

([https://ceq.doe.gov/guidance/ceq\\_guidance\\_nepa-ghg-climate\\_final\\_guidance.html](https://ceq.doe.gov/guidance/ceq_guidance_nepa-ghg-climate_final_guidance.html))

- Doesn't EE involved bringing new generation on-line?

threshold will be lowered and more emitters brought into the program, through 2035 (Ecology, 2016). Although PSE operates electricity generating plants, such infrastructure is not proposed in any of the alternatives. The newly adopted Clean Air Rule does not apply to the proposed alternatives and, given its relatively large threshold, is not applied in the following impact analysis.

### Chapter 3.5.5.1

- What does 'considerable' mean in “cumulatively considerable contribution”?  
important due to cumulative effects GHG emissions have had and are having on global climate. Impacts are assessed based on the project's potential to result in a cumulatively considerable contribution to the state and overall global GHG burden. Potential mitigation measures to minimize or eliminate greenhouse gas emissions associated with the project are considered, as warranted
- when are potential mitigation measures warranted?

### Chapter 3.5.7.1

- When it is said that the emissions would be substantially below the reporting threshold of 10,000 metric tons, is that 10,000 metric tons of CO2e (same question for 3.5.7.2)? This is not clear in the document.

#### Chapter 3.5.7.2

- The SF6 emission calculation is slightly off and would equate to 76.7 metric tons CO<sub>2</sub>e rather than the 75 tons as documented.

#### Chapter 3.5.7.8

- The numbers in the table don't reflect the body of text (39 v 40). This is also true for Table 3.5-2.

#### Chapter 3.5.8

- What is the distinction between "Mitigation measures specified by code" and those based on "state and local programs"?

##### **3.5.8 Mitigation Measures**

For GHG, regulations and state and local GHG reduction programs were reviewed to identify mitigation measures. Mitigation measures specified by code would be required, whereas mitigation measures based on state and local programs would be at the discretion of the applicant to adopt or the local jurisdictions to impose as a condition of project approval.

#### Chapter 3.5.8.1

- Why is the word 'would' used instead of 'will' in the first sentence of paragraph 2?
- Why would long-term sequestration loss impacts only be POTENTIALLY offset?

#### Chapter 3.5.8.2

- The **less-than-significant GHG impact** obviates the need for mandatory reporting. However, does this also imply that no mitigation measures may be required as suggested? Why couldn't mitigation be nonetheless required?