Final Draft
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"What Emission Source to Measure?" Criteria

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Guiding Principle:

Does the level of effort (cost, difficulty etc.) of calculating a specific type of emission from a specific proposal outweigh its contribution to climate change impacts? ("de minimus" issue)

Criteria for Considering Sources of Emissions to be Measured (project and non-project):

1. Has the source of the emission for this proposal been addressed (analyzed and mitigated) in another SEPA document, or local, regional, or state plan?
2. Can the source be credibly measured or assessed (quantified or otherwise) with the tools/information currently available?
3. Can the boundary (scope or scale) of the emission be determined?
4. What is relative importance (regionally, nationally or globally) of the contribution of this emission source to climate change impacts? (*e.g. indirect transportation emissions might be a relative minor part of a proposals' emissions but cumulatively they are a major GHG source for Washington. Also, direct or fugitive emissions methane and nitrous oxide could be lower in total contribution of a proposal but they're higher in greenhouse gas potency than* Co_2)
5. Can the proposal be modified to avoid, minimize or otherwise mitigate its contribution of this emission source?

Points to Consider in Determining What Gets Measured:

a. What gets quantified or otherwise evaluated gets considered, managed, and potentially mitigated by agencies with jurisdiction.

b. For project proposals, should the lead agency or the applicant be responsible for calculating a specific type of emission?

c. Can Ecology or lead agency provide guidance to the applicant on how to do the analysis?

d. The applicable mitigation could be broad, programmatic (such as requiring additional GHG emission reporting).

e. The carbon sink part of mitigation (net emissions) is more complex, more speculative, with less definitive science, especially in the agricultural arena. This may require different metrics such as wetland acreage loss with 2:1 substitutions or transfer of development rights (TDR) on similar soil and climate types, or afforestation acreage to compensate deforestation on similar soil/climate type. Ecology statewide rollup may be the place to require net emissions calculations from GHG carbon sinks, with optional use of Ecology models for the SEPA checklist.

f. Should we assume all GHG emissions are adverse impacts (not necessarily significant impacts) that must be disclosed. Then set some reasonable parameters such as readily available, credible and not speculative science.

g. Can we allow flexibility for lead agency to go beyond a "minimum" GHG assessment that Ecology guidance or new Ecology exemption rules prescribe?

h. Can the future content and format of the GHG measurement worksheet or checklist questions address the following?

- Does this information facilitate the threshold determination by lead agency?
- Does this information help fill the regulatory gaps and identify the regulatory overlaps?
- Is it easy, fill-in the blank reporting?
- Provide certainty and consistency for proponents?
- Understandable, and do-able at the project or non-project stage?
- Applies to variety of typical SEPA actions?
- Allow for initial mandatory analysis to use best available and credible science but be flexible for future updates to model and source data. This may lower the tier and increase future reporting and analysis requirements?
- Does it provide an accurate or "fair" picture of a project's impacts?
- Does this adequately address the "cumulative" nature of climate change impacts?
- Will the scope of emissions enhance or reduce mitigation opportunities?
- Prevents option of choosing less GHG rich material or preventing more GHG intense activity.
- Will this assessment of emissions help agencies with jurisdiction reach state GHG reduction goal since the goals are based on total GHG emissions?