

# PUGET SOUND CLEAN AIR AGENCY

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Seattle, Washington 98101-3317

Date: Oct. 8, 2019

Proponent: Puget Sound Clean Air Agency

Project, Brief Title: **Regulation IV, Clean Fuel Standard**

## Environmental Checklist

### Purpose of Checklist:

The State Environmental Policy Act (SEPA), Chapter 43.21C RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An Environmental Impact Statement (EIS) must be prepared for all proposals with probable significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and the agency identify impacts from your proposal (and to reduce or avoid impacts from the proposal, if it can be done) and to help the agency decide whether an EIS is required.

### Instructions for Applicants:

This environmental checklist asks you to describe some basic information about your proposal. Governmental agencies use this checklist to determine whether the environmental impacts of your proposal are significant, requiring preparation of an EIS. Answer the questions briefly, with the most precise information known, or give the best description you can.

You must answer each question accurately and carefully, to the best of your knowledge. In most cases, you should be able to answer the questions from your own observations or project plans without the need to hire experts. If you really do not know the answer, or if a question does not apply to your proposal, type "do not know" or "does not apply". Complete answers to the questions now, may avoid unnecessary delays later.

Some questions ask about governmental regulations, such as zoning, shoreline, and landmark designations. Answer these questions if you can. If you have problems, the governmental agencies can assist you.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

### Use of checklist for non-project proposals:

Complete this checklist for non-project proposals, even though questions may be answered “does not apply”. IN ADDITION, complete the SUPPLEMENTAL SHEET FOR NON-PROJECT ACTIONS (part D).

For non-project actions, the references in the checklist to the words “project”, “applicant”, and “property or site” should be read as “proposal”, “proposer”, and “affected geographic areas”, respectively.

**TO BE COMPLETED BY THE APPLICANT**

**A. BACKGROUND**

1. Name of proposed project, if applicable: Clean Fuel Standard
2. Name of applicant: Puget Sound Clean Air Agency
3. Address and phone number of applicant and contact person:  
Name: Kathy Strange Title: Air Quality Programs Director  
Firm: Puget Sound Clean Air Agency Telephone: (206) 689-4095  
PO Box/Street: 1904 3<sup>rd</sup> Ave., #105  
City/State/Zip: Seattle, WA 98101-3317
4. Date checklist prepared: 10/08/2019
5. Agency requesting checklist: Does not apply.
6. Proposed timing or schedule (including phasing, if applicable).

CR-102 form filed with State Code Reviser	10/08/2019
Agency Public Hearing	12/19/2019
CR-103 form filed with State Code Reviser	no sooner than
2/27/2020 (estimated date)	
Approximate Effective Date of Revised Regulation	01/01/2021
7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

The Agency is not currently aware of any future rule-making activity by the Agency related to this proposed regulation. The Agency plans to conduct periodic review of the regulation after its adoption and implementation. Any future rule-making would be required to comply with applicable requirements of SEPA.
8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.
  - ICF for Puget Sound Clean Air Agency. Puget Sound Regional Transportation Fuels Analysis, Final Report, September 2019.  
<http://www.pscleanair.org/DocumentCenter/View/3809/Clean-Fuel-Standard-Technical-Analysis---Final-Report?bidId=>.

The following documents were not prepared for this proposal, but are directly related to statements within this document.

- Puget Sound Clean Air Agency. Candidate Actions to Reduce Transportation Greenhouse Gas Emissions - Evaluation Report. June 2018.  
[http://www.pscleanair.org/DocumentCenter/View/3314/Evaluation-Report\\_Transportation-Actions\\_June2018?bidId=.](http://www.pscleanair.org/DocumentCenter/View/3314/Evaluation-Report_Transportation-Actions_June2018?bidId=)
- US Environmental Protection Agency (EPA). Integrated Science Assessment for Particular Matter. December 2009.  
[https://cfpub.epa.gov/ncea/isa/recordisplay.cfm?deid=216546.](https://cfpub.epa.gov/ncea/isa/recordisplay.cfm?deid=216546)
- Washington State Department of Ecology. Concerns About Adverse Health Effects of Diesel Engine Emissions. December 2008.  
[https://fortress.wa.gov/ecy/publications/documents/0802032.pdf.](https://fortress.wa.gov/ecy/publications/documents/0802032.pdf)
- EPA. How Mobile Source Pollution Affects Your Health.  
[https://www.epa.gov/mobile-source-pollution/how-mobile-source-pollution-affects-your-health.](https://www.epa.gov/mobile-source-pollution/how-mobile-source-pollution-affects-your-health)
- EPA. Fact Sheet – Social Cost of Carbon. December 2016.  
[https://www.epa.gov/sites/production/files/2016-12/documents/social\\_cost\\_of\\_carbon\\_fact\\_sheet.pdf](https://www.epa.gov/sites/production/files/2016-12/documents/social_cost_of_carbon_fact_sheet.pdf)

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

None that the Agency is aware of.

10. List any government approvals or permits that will be needed for your proposal, if known.

None that the Agency is aware of.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page.

The Puget Sound Clean Air Agency proposes to adopt a new rule: the Clean Fuel Standard. The Clean Fuel Standard (hereinafter “proposed CFS”) will reduce GHG emissions and air pollution by reducing the full life cycle carbon intensity of the transportation fuel pool used in the Agency’s jurisdiction by 15, 20, or 25 percent below 2016 levels by 2030.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The proposed CFS would apply throughout the Agency’s four county region/jurisdiction: King, Kitsap, Pierce, and Snohomish counties in the State of Washington.

B. ENVIRONMENTAL ELEMENTS

**For §§ B (1), (3), (4), (5), (7), and (9) through (16) below, please *see* the Agency's discussion of these elements of the environment in §D below. The analysis in this checklist represents a good faith effort to evaluate the potential for significant impacts associated with reasonably foreseeable responses to the proposed CFS without being speculative. While some types of reasonably foreseeable responses to the proposed CFS may be identified in a general sense, the specific location, scope, design and location of responsive actions cannot be reasonably known at this time and consequently, no specific project or location, or associated impacts to the earth, water, wetlands, plants, animals, environmental health, noise, housing, aesthetics, light and glare, recreation, historic and cultural preservation, transportation, public services or utilities from a specific project or at a specific location or mitigation measures to reduce potential impacts, can be reasonably identified or evaluated in this checklist.**

1. **Earth**
  - a. General description of the site (flat, rolling, hilly, steep slopes, mountainous, other):
  - b. What is the steepest slope on the site (approximate percent slope)?
  - c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.
  - d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.
  - e. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.
  - f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.
  - g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?
  - h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

## 2. Air

- a. What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial wood smoke, greenhouse gases) during construction and when the project is completed? If any, generally describe and give approximate quantities, if known.

The proposed CFS is expected to:

- Reduce the lifecycle carbon intensity of the transportation fuel pool by 15, 20, or 25 percent in the Agency's four-county jurisdiction by 2030;
- Reduce the amount of greenhouse gas emissions in the Agency's four-county jurisdiction by an estimated 1.8, 2.3, to 3 million metric tons of carbon dioxide equivalents (CO<sub>2</sub>e) annually by 2030 (for respective targets of 15%, 20%, and 25% CI reduction);
- Reduce fine particle pollution by an estimated 60, 80, to 100 tons per year by 2030 in the Agency's four-county jurisdiction (for respective targets of 15%, 20%, and 25% CI reduction); and
- Reduce other criteria and toxic pollutants including diesel particulate matter in the Agency's four-county jurisdiction.

Please *see* the Puget Sound Regional Transportation Fuels Analysis Final Report (ICF 2019) for a more specific discussion of the reduction of air emissions from the proposed CFS.

While not proposed at this time, there may be project actions proposed in the future by applicants (public and private) in response to this regulation, for example, an application to install improvements to a refinery to reduce emissions to generate credits or an application to construct a new facility to produce a transportation fuel or fuels, that could be subject to the proposed CFS. These future project actions could be proposed in or outside of the State of Washington. These future proposed actions may create direct or indirect air impacts, but any such impacts are unknown and speculative at this time. In addition, any future project actions in the State of Washington would be required to comply with SEPA at the time an application is filed; environmental review would be performed at that time when the project actions are defined and air impacts identified. Outside of the State of Washington applicable environmental review would occur pursuant to applicable legal authorities.

- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

None that the Agency is aware of given that this is a non-project proposal.

- c. Proposed measures to reduce or control emissions or other impacts to air, if any:

At the time of this non-project action, no increased air emissions or air impacts are identified and no related measures are proposed. As discussed in §2(a) above, while not proposed at this time, there may be project actions proposed in the future by applicants (public or private) in response to this regulation. These future project actions could be proposed in or outside of the State of Washington. These future proposed actions may create direct or indirect air impacts, but any such impacts are unknown and speculative at this time. In

addition, any future project actions in the State of Washington would be required to comply with SEPA at the time an application was filed and future environmental review would identify any specific air impacts and proposed measures to reduce or control identified air impacts. In addition, generally, the types of mitigation measures to limit emissions for specific project actions could include limits on the amounts of air pollutants allowed to be emitted, add-on technologies to limit emissions and/or operational limits, process controls, and/or work practice requirements to limit emissions.

Regarding §§ 2(a)-(c) above, please also *see* §D below.

### 3. Water

#### a. Surface

- 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.
- 2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.
- 3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.
- 4) Will the proposal require surface water withdrawals or diversions? If yes, give general description, purpose, and approximate quantities, if known.
- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.
- 6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

#### b. Ground

- 1) Will groundwater be withdrawn, or will water be discharged to groundwater? If yes, give general description, purpose, and approximate quantities, if known.
- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: domestic sewage; industrial,

containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

c. Water runoff (including storm water)

1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

2) Could waste material enter ground or surface waters? If so, generally describe.

d. Proposed measures to reduce or control surface, ground, and runoff water impacts, if any:

**4. Plants**

a. Indicate types of vegetation found on the site.

\_\_\_ deciduous trees: \_\_\_ alder \_\_\_ maple \_\_\_ aspen  
\_\_\_ other (specify):

\_\_\_ evergreen trees: \_\_\_ fir \_\_\_ cedar \_\_\_ pine  
\_\_\_ other (specify):

\_\_\_ shrubs

\_\_\_ grass

\_\_\_ pasture

\_\_\_ crop or grain

\_\_\_ wet soil plants: \_\_\_ cattail \_\_\_ buttercup \_\_\_ bullrush  
\_\_\_ skunk cabbage \_\_\_ other (specify):

\_\_\_ water plants: \_\_\_ water lily \_\_\_ eelgrass \_\_\_ milfoil  
\_\_\_ other (specify):

\_\_\_ other types of vegetation (specify):

b. What kind and amount of vegetation will be removed or altered?

c. List threatened or endangered species known to be on or near the site.

- d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

## 5. Animals

- a. Indicate birds and animals that have been observed on or near the site or are known to be on or near the site.

\_\_\_ Birds:      \_\_\_ hawk   \_\_\_ heron      \_\_\_ eagle   \_\_\_ songbirds  
                         \_\_\_ other (specify):

\_\_\_ Mammals:   \_\_\_ deer   \_\_\_ bear      \_\_\_ elk      \_\_\_ beaver  
                         \_\_\_ other (specify):

\_\_\_ Fish:      \_\_\_ bass   \_\_\_ salmon   \_\_\_ trout   \_\_\_ herring   \_\_\_ shellfish  
                         \_\_\_ other (specify):

- b. List any threatened or endangered species known to be on or near the site.
- c. Is the site part of a migration route? If so, explain.
- d. Proposed measures to preserve or enhance wildlife, if any:

## 6. Energy and Natural Resources

- a. What kinds of energy (electric, natural gas, oil, woodstove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

The proposed CFS does not have any identifiable "energy needs" and it is not expected there will be negative energy impacts from the proposed CFS. Overall, as a result of this proposed regulation, there may be an overall or macro change generally to the types of energy sources used to create transportation fuels in response to this proposed regulation. While not proposed at this time, there may be project actions proposed in the future by applicants (public or private) in response to this regulation that may be to manufacture certain kinds of transportation fuels (a type of energy). These future project actions could be proposed in or outside of the State of Washington and may create direct or indirect environmental impacts, such as to existing energy sources, but any such impacts are unknown and speculative at this time. In addition, any future project actions in the State of Washington would be required to comply with SEPA at the time an application was filed; environmental review would be performed at that time when the project actions are defined and impacts identified. Outside of

the State of Washington applicable environmental review would occur pursuant to applicable legal authorities.

- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

The Agency is not aware of the proposed regulation's effect on any existing use of solar energy. Solar energy may, however, be an energy source for the production of transportation fuel under this proposed regulation but where and to what extent is not identifiable at this point in time. Any future project actions in the State of Washington involving the use of solar energy or potentially impacting existing production of solar energy would be required to comply with SEPA at the time an application was filed; environmental review would be performed at that time when the project actions are defined and impacts identified. Outside of the State of Washington applicable environmental review would occur pursuant to applicable legal authorities.

- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

At the time of this non-project action, no specific energy conservation features are identified and no measures are proposed. As stated in §§ 6(a)-(b) above, while not proposed at this time, there may be project actions proposed in the future by applicants (public or private) in response to this regulation. These future project actions could be proposed in or outside of the State of Washington. These future proposed actions may create direct or indirect environmental impacts, such as to existing energy sources, but any such impacts are unknown and speculative at this time. In addition, any future project actions in the State of Washington would be required to comply with SEPA at the time an application was filed and environmental review would be performed at that time when the project actions are defined and impacts identified and proposed mitigation for impacts or proposed energy conservation features, if applicable. Future project action outside the State of Washington would have to comply with all applicable requirements for environmental review and mitigation of impacts.

Regarding §§ 6(a)-(c) above, please also *see* § D below.

## 7. Environmental Health

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe:

1) Describe special emergency services that might be required.

2) Proposed measures to reduce or control environmental health hazards, if any:

b. Noise

- 1) What types of noise exist in the area that may affect your project (for example, traffic, equipment, operation, other)?
- 2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example, traffic, construction, operation, other)? Indicate what hours noise would come from the site.
- 3) Proposed measures to reduce or control noise impacts, if any:

**8. Land and Shoreline Use**

a. What is the current use of the site and adjacent properties?

As this a non-project action that does not directly involve or alter a particular property, there is no current use of a site, no zoning or designation classification of a particular site; no adjacent property to a particular site; and no specific persons who work on the site or will be displaced from a specific site.

There are refineries located in the State of Washington, including one refinery located in the City of Tacoma. Pursuant to the proposed CFS, refineries will be eligible to apply for a refinery investment credit project(s). Pursuant to the regulation, any refinery investment credit project must occur within the boundaries of the refinery and may include use of alternative energy sources, including electrification, or use of process controls, such as curtailment or maintenance improvements. No specific refinery investment credit project has been proposed at this time and any contents of a proposal are unknown and speculative at this time. Pursuant to the regulation, any refinery will also be eligible to co-process lower carbon intensity fuels. No specific co-processing request related to this regulation has been proposed at this time and any contents of a proposal are unknown and speculative at this time. Any such future project actions in the State of Washington, including the City of Tacoma, would be required to comply with SEPA and any applicable local requirements at the time an application was filed and environmental review would be performed at that time when the project actions are defined and impacts and mitigation identified.

b. Has the site been used for agriculture? If so, describe.

*See § 8(a) above.*

c. Describe any structures on the site.

*See § 8(a) above.*

d. Will any structures be demolished? If so, what?

*See § 8(a) above.*

e. What is the current zoning classification of the site?

*See § 8(a) above.*

- f. What is the current comprehensive plan designation of the site?  
*See § 8(a) above.*
- g. If applicable, what is the current shoreline master program designation of the site?  
*See § 8(a) above.*
- h. Has any part of the site been classified as an “environmentally sensitive” area? If so, specify.  
*See § 8(a) above.*
- i. Approximately how many people would reside or work in the completed project?  
*See § 8(a) above.*
- j. Approximately how many people would the completed project displace?  
*See § 8(a) above.*
- k. Proposed measures to avoid or reduce displacement impacts, if any:  
*See § 8(a) above.*
- l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

The proposed CFS Standard does not propose or encourage any uses that are incompatible with existing and projected land use or shoreline uses or plans in the Agency’s four-county jurisdiction. While not proposed at this time, there may be project actions proposed in the future by applicants (public or private) in response to this regulation that may for example, manufacture certain kinds of transportation fuels, that could cause future changes to existing land and shoreline uses. Future project actions could be proposed in or outside of the Agency’s four-county jurisdiction or the State of Washington. These future proposed actions may, in some potential circumstances, create direct or indirect land or shoreline use impacts, but any such impacts are unknown and speculative at this time. In addition, any future project actions in the State of Washington would be required to comply with SEPA, applicable zoning requirements and the Washington Shorelines Management Act at the time an application was filed and environmental review would be performed at that time when the project actions are defined and impacts and mitigation identified. Future project action outside the State of Washington would have to comply with all applicable requirements for environmental review and mitigation of impacts.

Regarding §§ 8(a)-(l) above, please also *see* §D below.

## 9. Housing

- a. Approximately how many units would be provided, if any? Indicate whether high- middle- or low-income housing.
- b. Approximately how many units, if any, would be eliminated? Indicate whether high- middle- or low-income housing.

- c. Proposed measures to reduce or control housing impacts, if any:

## **10. Aesthetics**

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?
- b. What views in the immediate vicinity would be altered or obstructed?
- c. Proposed measures to reduce or control aesthetic impacts, if any:

## **11. Light and Glare**

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur?
- b. Could light or glare from the finished project be a safety hazard or interfere with views?
- c. What existing off-site sources of light or glare may affect your proposal?
- d. Proposed measures to reduce or control light and glare impacts, if any:

## **12. Recreation**

- a. What designated and informal recreational opportunities are in the immediate vicinity?
- b. Would the proposed project displace any existing recreational uses? If so, describe.
- c. Proposed measures to reduce or control impacts on recreation, including recreational opportunities to be provided by the project or applicant, if any:

### **13. Historic and Cultural Preservation**

- a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.
- b. Generally describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.
- c. Proposed measures to reduce or control impacts, if any:

### **14. Transportation**

- a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on-site plans, if any.
- b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?
- c. How many parking spaces would the completed project have? How many would the project eliminate?
- d. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).
- e. Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.
- f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.
- g. Proposed measures to reduce or control transportation impacts, if any:

### **15. Public Services**

- a. Would the project result in an increased need for public services (for example, fire protection, police protection, health care, schools, other)? If so, generally describe.
- b. Proposed measures to reduce or control direct impacts on public services, if any:

**16. Utilities**

a. Indicate utilities currently available at the site:

- |   |   |
|---|---|
| <input type="checkbox"/> electricity    | <input type="checkbox"/> telephone        |
| <input type="checkbox"/> natural gas    | <input type="checkbox"/> sanitary sewer   |
| <input type="checkbox"/> water          | <input type="checkbox"/> septic system    |
| <input type="checkbox"/> refuse service | <input type="checkbox"/> other (specify): |

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity that might be needed.

*As to this Checklist overall, the Agency considered whether WAC 197-11-080 is applicable but concluded that information available to conduct an analysis of specific project-based potential impacts is not reasonably available at this time because the specific location, scope, design and location of any actions responsive to the proposed CFS are not known or reasonably identifiable at this time, are speculative and are not essential to a reasoned choice to adopt the regulation.*

**C. SIGNATURE**

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature:  \_\_\_\_\_

Date Submitted: 10/08/2019 \_\_\_\_\_

## D. SUPPLEMENTAL SHEET FOR NON-PROJECT ACTIONS

(do not use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substance; or production of noise?

This non-project proposal to adopt a Clean Fuel Standard in the Agency's four-county jurisdiction (King, Kitsap, Pierce and Snohomish Counties) is not likely to increase discharge to water; emissions to air; production, storage or release of toxic or hazardous substances; or production of noise.

Regarding air emissions, as discussed in § 2(a) above, the proposed regulation is likely to decrease annual greenhouse gas emissions (CO<sub>2</sub>e) and emission of fine particle pollution (PM<sub>2.5</sub>) by 1.8, 2.3 to 3 million metric tons and 60, 80 to 100 tons, respectively, by 2030 (for respective targets of 15%, 20%, and 25% carbon intensity reduction). Reduction of PM<sub>2.5</sub> emissions will have the following benefits to human health: fewer premature deaths, heart attacks, chronic obstructive pulmonary disease (COPD), fewer hospital admissions and doctor visits, fewer asthma attacks and associated lost work and school days. The proposed regulation is also likely to decrease emissions of mobile source air toxics and associated reduced potential cancer risk. *See also* references listed on pages 2 and 3 above for further details.

Reduction of greenhouse gases also reduces the "social cost of carbon" by reducing damages. The social cost of carbon is a measure of the long-term damage from CO<sub>2</sub> emissions. Benefits of reducing the social cost of carbon include, but are not limited to, avoiding damages to net agricultural productivity, human health, and property damages from increased flood risk. *See also* references listed on pages 2 and 3 for further details.

As stated above, the proposed CFS is not likely to increase discharge to water, to the production, storage, or release of toxic or hazardous substance or to the production of noise. While not proposed at this time, there may be project actions proposed in the future by applicants (public or private) in response to the proposed CFS in or outside of the State of Washington. These future proposed actions may create direct or indirect impacts, such as to water, the production, storage, or release of toxic or hazardous substance or noise, but any such impacts are unknown and speculative at this time. In addition, any future project actions in the State of Washington would be required to comply with SEPA at the time an application was filed; environmental review would be performed at that time when the project actions are defined and impacts identified. Future project actions outside of the State of Washington would have to comply with will all applicable requirements for environmental review and mitigation of impacts.

Proposed measures to avoid or reduce such increase are:

*See § D(1) above; no increases are expected or reasonably identifiable at this time.*

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

This non-project proposal to adopt a Clean Fuel Standard in the Agency's four-county region is not likely to affect plants, animals, fish, or marine life. While not proposed at this time, there may be project actions proposed in the future by applicants (public or private) in response to this regulation. These future project actions could be proposed in or outside of the State of Washington and may create direct or indirect impacts, such as to plants, animals, fish, or marine life, but any such impacts are unknown and speculative at this time. In addition, any future project actions in the State of Washington would be required to comply with SEPA at the time an application was filed; environmental review would be performed at that time when the project actions are defined and impacts identified. Future project actions outside of the State of Washington would have to comply with all applicable requirements for environmental review and mitigation of impacts.

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

*See § D(2) above; no increases are expected or reasonably identifiable at this time.*

3. How would the proposal be likely to deplete energy or natural resources?

This non-project proposal to adopt a Clean Fuel Standard in the Agency's four-county region is not likely to deplete energy or natural resources. In addition, as discussed in § § B (6) and (8) above, the proposed regulation is not likely to cause negative energy or land and shoreline use impacts. As a result of this proposed regulation there may be an overall or macro change generally to the types of energy sources used to create transportation fuels in response to this proposed regulation. While not proposed at this time, there may be project actions proposed in the future by applicants (public or private) in response to this regulation to manufacture certain kinds of transportation fuels (a form of energy). Future project actions as result of or in response to the proposed regulation could be proposed in or outside of the State of Washington. These future proposed actions may create direct or indirect environmental impacts, such as to existing energy sources, but any such impacts are unknown and speculative at this time. In addition, any future project action in the State of Washington would be required to comply with SEPA. At the time an application was filed, environmental review would be performed at that time to define project actions and identify impacts and consider mitigation. Future project actions outside the State of Washington would have to comply with all applicable requirements for environmental review and mitigation of impacts.

Proposed measures to protect or conserve energy and natural resources are:  
*See* § D(3) above; no impacts are expected or reasonably identifiable at this time.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

This non-project proposal to adopt a Clean Fuel Standard in the Agency's four-county region is not likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection, such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains or prime farmlands.

While not proposed at this time, there may be project actions proposed in the future by applicants (public or private) in response to this regulation that may be to manufacture certain kinds of transportation fuels. This could mean that farmlands used to grow one kind of crop, like corn, could be used grow another kind of crop like canola. Future project actions could be proposed in or outside the State of Washington. These future proposed actions may, in some potential circumstances, create direct or indirect environmental impacts, such as to environmental sensitive areas or farmlands, but any such impacts are unknown and speculative at this time. In addition, any future project actions in the State of Washington would be required to comply with SEPA at the time an application was filed and environmental review would be performed at that time when the project actions are defined and impacts identified, including proposed mitigation for identified impacts. Future project action outside the State of Washington would have to comply with all applicable requirements for environmental review and mitigation of impacts.

It is important to note a distinction between the answer above and the indirect land use change calculated for purposes of estimating the GHG emissions associated with the complete lifecycle of the production of biofuels.<sup>1</sup> While the Agency has identified a certain amount of change to land use in the production of biofuels, including ethanol and biomass-based diesel, the Agency is unable to identify any specific future project actions (including the location, scope, or details related to a project action) resulting from the adoption of this proposed regulation. Thus, this Checklist cannot reasonably identify specific direct or indirect land use impacts to be caused by the proposed regulation. As noted above, any future project actions would be required to comply with applicable environmental and zoning requirements.

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<sup>1</sup>California Air Resources Board. Detailed Analysis for Indirect Land Use Change. California Air Resources Board [https://ww3.arb.ca.gov/fuels/lcfs/iluc\\_assessment/iluc\\_analysis.pdf](https://ww3.arb.ca.gov/fuels/lcfs/iluc_assessment/iluc_analysis.pdf).

Proposed measures to protect such resources or to avoid or reduce impacts are:

*See* §§ B(6) and (8) and § D(4) (above) and § D(5) (below) no impacts are expected or reasonably identifiable at this time.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

This non-project proposal to adopt a Clean Fuel Standard in the Agency's four-county region is not likely to affect land and shoreline uses or existing land or shoreline plans and is not incompatible with existing land and shoreline uses. While not proposed at this time, there may be project actions proposed in the future by applicants (public or private) in response to this regulation that may be to manufacture certain kinds of transportation fuels, that could cause future changes to existing land and shoreline uses. Future project actions could be proposed in or outside of the State of Washington and may, in some potential circumstances, create direct or indirect land or shoreline use impacts, but any such impacts are unknown and speculative at this time. In addition, any future project actions would be required to comply with SEPA, applicable zoning requirements and the Washington Shorelines Management Act at the time an application was filed and environmental review would be performed at that time when the project actions are defined and land use impacts identified. Future project action outside the State of Washington would have to comply with all applicable requirements for environmental review and mitigation of impacts.

It is important to note a distinction between the answer above and the indirect land use change calculated for purposes of estimating the GHG emissions associated with the complete lifecycle of the production of biofuels.<sup>2</sup> While the Agency has identified a certain amount of change to land use in the production of biofuels, including ethanol and biomass-based diesel, the Agency is unable to identify any specific future project actions (including the location, scope, or details related to a project action) resulting from the adoption of this proposed regulation. Thus, this Checklist cannot reasonably identify specific direct or indirect land use impacts to be caused by the proposed regulation. As noted above, any future project actions would be required to comply with applicable environmental and zoning requirements.

Proposed measures to avoid or reduce shoreline and land use impacts are:

*See* §§ B(6) and (8) and D §§ (4) - (5) above; no impacts are expected or reasonably identifiable at this time.

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<sup>2</sup>*Ibid.*

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

This non-project proposal to adopt a Clean Fuel Standard in the Agency's four-county region is not likely to increase demand on transportation or public services or utilities. While in the future, different types of transportation fuel may be generated or used in the Agency's four-county region as a result of the proposed regulation, it is not likely that the proposed regulation would increase demands on transportation or public services. In addition, while utilities and transit agencies may participate as credit generators under the regulation, it is not likely that the proposed regulation would increase demands on utilities or transportation services. Finally, while not proposed at this time, there may be project actions proposed in the future by applicants (public or private) in response to this regulation that may be to manufacture certain kinds of transportation fuels or to install electric vehicle charging infrastructure that could cause future changes to demand for utilities. These future project actions could be proposed in or outside of the State of Washington. These future proposed actions may, in some potential circumstances, create direct or indirect transportation, public service, or utility impacts, but any such impacts are unknown and speculative at this time. In addition, any future project actions in the State of Washington would be required to comply with SEPA and at the time an application was filed an environmental review would be performed when the project actions are defined and impacts identified. Future project actions outside of the State of Washington would have to comply with will all applicable requirements for environmental review and mitigation of impacts.

Proposed measures to reduce or respond to such demand(s) are:

*See § D(6) above; no increases in demands are expected or reasonably identifiable at this time.*

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

The Agency is not aware of any conflicts between the proposed regulation and any local, state, or federal laws or requirements for the protection of the environment.