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**SUMMARY OF THE FINAL REVISIONS TO THE
MEPA GREENHOUSE GAS EMISSIONS POLICY AND PROTOCOL**

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BACKGROUND AND HISTORY OF THE POLICY

The Secretary of Energy and Environmental Affairs (EEA) originally issued the Greenhouse Gas Emissions Policy and Protocol (“the Policy” or the “GHG Policy” hereinafter) in 2007 after determining that the phrase “damage to the environment” as used in the Massachusetts Environmental Policy Act (MEPA) includes the emission of greenhouse gases (GHGs) caused by projects subject to MEPA review. The Policy became mandatory for certain categories of projects that filed an Environmental Notification Form (ENF) with the MEPA Office after November 1, 2007.

On November 5, 2008, pursuant to the Global Warming Solutions Act of 2008 (Chapter 298 of the Acts of 2008) the MEPA statute (M.G.L. c. 30, §§61-62I) was amended to provide that:

In considering and issuing permits, licenses and other administrative approvals and decisions, the respective agency, department, board, commission or authority shall also consider reasonably foreseeable climate change impacts, including additional greenhouse gas emissions, and effects, such as predicted sea level rise. M.G.L. c. 30, §61.

As a result of this statutory change, the Policy was revised in November 2008 to apply to all projects for which an ENF was filed after February 3, 2009 and which required the preparation of an Environmental Impact Report (EIR). In 2009, the MEPA Office convened a stakeholder working group to discuss the statutory revisions and to recommend changes to this

policy based upon the experiences of the MEPA Office, state permitting Agencies, and project proponents in applying the requirements of the policy since 2007.

Based upon the input provided by the stakeholders, on February 10, 2010 the MEPA Office issued further proposed revisions to the Policy, and held a 30-day public comment period to accept input on the proposed changes. The comment period lasted until March 12, 2010. Numerous public comments were received.

Based upon the input provided by stakeholders and public commenters, and taking into account the changes to MEPA's enabling statute, the MEPA Office has now incorporated certain revisions to the GHG Policy to clarify the requirements for review and analysis of GHG emissions and to fulfill MEPA's statutory obligations to: (1) consider the reasonably foreseeable climate change impacts and GHG emissions of projects subject to MEPA review (and effects such as predicted sea level rise); and (2) ensure that projects subject to MEPA take all feasible measures to avoid, minimize, or mitigate "Damage to the Environment" (as defined in the MEPA statute), including GHG emissions.

In addition to this Summary of the Final Revisions to the MEPA GHG Policy and Protocol, the MEPA Office is also separately issuing today:

- 1) A Response to Comments that were submitted on the Draft Revised Policy; and
- 2) The Final Revised MEPA GHG Emissions Policy and Protocol that will apply to projects as of May 5, 2010.

SUMMARY OF THE POLICY AND CHANGES

PURPOSE OF THE POLICY

MEPA requires that all project proponents undertake an assessment of project impacts and alternatives in an effort to avoid, minimize and mitigate Damage to the Environment to the maximum extent feasible.¹ Building on this general requirement, the Policy requires that certain

¹ Specifically, the MEPA statute requires that: "An environmental impact report shall contain statements describing the nature and extent of the proposed project and its environmental impact; all measures being utilized to minimize environmental damage; any adverse short-term and long-term environmental consequences which cannot be avoided should the project be undertaken; and reasonable alternatives to the proposed project and their environmental consequences." M.G.L. c. 30, s. 62B. The MEPA regulations define Damage to the Environment as: Any destruction or impairment (not including insignificant damage or impairment), actual or probable, to any of the natural resources of the Commonwealth including, but not limited to, air pollution, water pollution, improper sewage disposal, pesticide pollution, excessive noise, improper operation of dumping grounds, impairment and eutrophication of rivers, streams, flood plains, lakes, ponds or other surface or subsurface water resources, destruction of seashores, dunes, marine resources, underwater archaeological

projects undergoing review by the MEPA Office quantify their GHG emissions and identify measures to avoid, minimize, or mitigate such emissions. In addition to quantifying project-related GHG emissions, the Policy also requires proponents to evaluate project alternatives that may result in lower GHG emissions and to quantify the impact of proposed mitigation in terms of emissions and energy savings.

The principal purpose of the Policy is to require proponents to undertake a thorough analysis of a proposed project's primary sources of GHG emissions at an early stage of project planning and to examine all feasible alternatives that may have lower GHG emissions potential. By conducting this early-stage impacts and alternatives analysis, project proponents can integrate sustainable design considerations directly into project planning, which will allow the project to achieve GHG emissions reductions in the most cost-effective manner. Since the Policy was originally put in place in 2007, numerous projects have submitted draft or final EIR's providing an estimate of project-related GHG emissions and proposing alternatives with lower GHG emissions. These projects have demonstrated that significant emissions reductions can be achieved through adoption of mitigation measures designed to reduce energy consumption and vehicle trips.

RELATION TO CHAPTER 21N, THE CLIMATE PROTECTION AND GREEN ECONOMY ACT

The MEPA GHG policy is not a stand-alone effort, but rather is part of a wider effort to focus attention on the causes of climate change and harness creative thought and technology to implement long-term solutions. As noted above, the requirement for state Agencies to expressly consider the climate change impacts and GHG emissions of a proposed project prior to issuing any permits or other administrative approvals has been codified in the MEPA statute pursuant to the Global Warming Solutions Act. More broadly, that Act also created the Climate Protection and Green Economy Act (codified at the new Chapter 21N of the General Laws) which requires reductions in state-wide carbon emissions by between 10 and 25% below 1990 emissions levels by the year 2020², and by 80% below 1990 emissions levels by the year 2050. EEA is currently working with the Massachusetts Department of Environmental Protection (MassDEP) to develop a plan for implementation of Chapter 21N in accordance with the deadlines set forth in the Global Warming Solutions Act. By focusing attention on carbon emissions from new projects subject to MEPA review, this Policy is an important component of the Administration's ongoing efforts to implement the mandatory reductions targets set forth in Chapter 21N and to reduce Massachusetts' contribution to global climate change. The MEPA Office recognizes that those evolving plans will necessitate periodic review of the GHG Policy in light of evolving permitting requirements that may eventually emerge from that process.

The MEPA office also acknowledges that the change to Chapter 30 Section 61 resulting from the Global Warming Solutions Act additionally requires project proponents to address not

resources, wetlands, open spaces, natural areas, parks, or historic districts or sites. (310 CMR 11.02).

² Pursuant to M.G.L. c. 21N, ss. 3(b) and 4, the Secretary of Energy and Environmental Affairs shall no later than January 1, 2011 select a 2020 statewide emissions limit of between 10 and 25% below 1990 emissions levels and adopt a plan to achieve that limit.

only the GHG emissions of projects subject to MEPA review but also the effects of climate change, such as predicted sea level rise. In accordance with the Global Warming Solutions Act, the Secretary has separately established an Advisory Committee to assess climate change adaptation strategies. The Advisory Committee comprises experts from business, academia, and nonprofit organizations, who will meet periodically and report their findings to the Legislature. It is expected that the Advisory Committee's report will contain recommendations for how MEPA should approach this challenging issue in the context of project-specific review. The MEPA Office will review those recommendations when they are issued and begin a separate process for establishing criteria for assessment of this particular environmental impact during the MEPA process.

INTERSECTION WITH THE MEPA REGULATIONS

Because of the technical, detailed and evolving nature of the analysis protocol outlined in the revised Policy, the MEPA Office has established the GHG Policy as a means of providing guidance to proponents without creating specific new regulatory requirements. Nothing in the GHG Policy should be construed to supersede or contradict the MEPA regulations at 301 CMR 11.00. The Policy is provided as guidance for proponents in preparing an analysis that will comply with the requirements of MEPA, including the MEPA regulations.

It should be noted that the Policy itself does not create any new MEPA review thresholds or require MEPA review where it is not otherwise required. Rather, it provides guidance concerning the type of analysis to be undertaken by projects that are already subject to MEPA review and that will need to file an EIR. However, the MEPA Office has been working with stakeholders to identify revisions to the MEPA regulations (301 CMR 11.00) that would incorporate the concept of GHG emissions into the regulations in accordance with the Global Warming Solutions Act. It is expected that the Secretary of Energy and Environmental Affairs will propose an additional MEPA review threshold specific to GHG emissions as part of these changes. The proposed changes will be released for public review and comment in accordance with M.G.L. Chapter 30A when they become available.

QUANTIFICATION AND METHODOLOGY

The MEPA Office recognizes that the GHG quantification required by this Policy will not result in absolutely accurate projections. The inherent limitations of energy modeling tools coupled with the fact that MEPA review takes place at a relatively early stage of project design make absolute accuracy difficult to achieve. The intent of the policy is not one hundred percent certainty as to the amount of GHG emissions; rather, it is to achieve a reasonably accurate quantitative analysis of emissions and potential mitigation that will allow the project proponent and reviewers to assess the overall impact of the project as proposed and the reduction in emissions if various techniques are used. By estimating GHG emissions using a consistent methodology across project alternatives, a relative picture of the potential emissions associated with each alternative emerges that can inform decision making by project proponents and state Agencies.

It should also be noted that the Policy is not intended to create a numerical GHG emission limit or a numerical GHG emissions reduction target. Rather, in keeping with MEPA's overall purpose to evaluate alternatives that avoid, minimize and mitigate environmental impacts to the maximum extent practicable (301 CMR 11.01), the Policy is intended to ensure that project proponents and reviewers have carefully considered the GHG impact of their projects and taken all feasible means and measures to reduce those impacts. This is inherently a case-by-case inquiry that allows project proponents to select mitigation measures that are determined to be feasible for the particular project being proposed, thereby providing project proponents with maximum flexibility to design their projects.

ENERGY USE MODELING AND EARLY-STAGE DESIGN

The MEPA Office also recognizes that some project proponents may not be at an advanced level of project design planning at the time of filing an EIR, and therefore may have to make numerous assumptions about project design, building systems and energy use patterns. Similarly, the MEPA Office understands that certain projects undergoing review under MEPA may not be able to identify the end-users (tenants or subsequent owners) of buildings being constructed by a project proponent. However, the Policy allows for the quantification of emissions even when a proposed project is at a relatively conceptual level of design through use of informed modeling assumptions about building construction and energy systems. It is also possible for project proponents to either make assumptions about the future uses of buildings that will be constructed, or to provide direct mitigation measures that will influence future tenants or occupants to reduce their energy use. Although there are recognized limitations to this early-stage analysis, it is likely that the time and financial resources devoted to up front reductions in energy consumption will have a beneficial long-term payback.

The Policy also does not contain absolute prescriptions with respect to the modeling tools used for estimating a project's likely energy usage. This flexibility with respect to modeling tools permits proponents to utilize different models and methodologies as they evolve over time.

CHANGES UNDER THE CURRENT VERSION OF THE POLICY

The following is a summary of the key components of the Policy that were revised in 2010 in response to stakeholder input and public comment:

1. Retention of case-by-case approach to analysis.

Since the establishment of the original GHG Policy, the MEPA Office has considered whether the GHG Policy should be revised to establish a specific performance standard or emissions reduction target. For example, the GHG Policy could hypothetically specify an approach similar to that employed by the City of Boston's Article 80 Large Project Review Green Building Amendment, which requires projects to be eligible for LEED Certification.³ Alternatively, an emissions reduction target (e.g., 25% below the project baseline) could be

³ "LEED", Leadership in Energy and Environmental Design Green Building Rating System®.

established in order to give proponents guidance in advance as to the level of emissions reductions that must be achieved in order to adequately and properly comply with MEPA.

After consideration of possible alternative requirements and discussion concerning the statutory requirements of MEPA, the MEPA Office has elected to retain the original requirement that a proposed project reduce its GHG emissions to the maximum extent feasible. The Policy does not create a numerical GHG emission limit or a numerical GHG emissions reduction target. While the alternative approaches have merit in certain contexts, this case-by-case approach is most consistent with MEPA's statutory mandate to avoid, minimize and mitigate Damage to the Environment to the maximum extent feasible (see footnote number 1 above). It is also most consistent with the general approach of MEPA, which is to encourage project proponents to think creatively about how best to achieve environmental goals, rather than prescribing a one size fits all result.

2. Clarification of the project baseline for building-related emissions.

The MEPA Office has also worked with project stakeholders to evaluate whether to retain the currently-in-force Massachusetts State Building Code (780 CMR) as the project baseline for projects that involve construction of buildings. Under the Green Communities Act (Section 55 of Chapter 169 of the Acts of 2008), the Board of Building Regulations and Standards (BBRS) must update the energy provisions of the state building code within one year of any revision to the International Energy Conservation Code (IECC). IECC updates occur every three years, and therefore the State Building Code will be updated at least every three years on a going-forward basis under current law. As a result, under the prior GHG Policy the project baseline for buildings would also change every three years.

The MEPA Office identified potential challenges associated with this automatically updating baseline. For instance, the building code could potentially be updated during the pendency of a particular project which could create confusion. Similarly, this automatically updating baseline might make it difficult to compare projects undergoing MEPA review over time, since newer projects would be subject to a more stringent baseline than older projects.

Conversely, there are other challenges that may arise if the baseline was fixed permanently in time. Because the buildings will actually be constructed under the building code in force at the time of construction, measuring emissions reductions based on a fixed past building code could create confusion amongst the reviewing public as to the actual amount of emissions reductions that will be achieved beyond what would be required by the code (if any). In addition, requiring proponents to evaluate proposed alternative mitigation measures against an updated building standard (which is by definition feasible) furthers the policy goals of requiring proponents to reduce emissions to the maximum extent feasible.

After carefully considering the issue, the MEPA Office has revised the Policy to clarify that the state building code in effect at the time of ENF filing be used as the specified project baseline for buildings. The proponent should use the most current version of the building code that is in force at the time the ENF is filed. The Secretary's Certificate on the ENF will reference the currently-in-force building code version to ensure it is clear which version should be

modeled. In addition, the building code version specified in the Certificate on the ENF will be the baseline applicable to the project for the entire life of the project (even if the State Building Code is updated during the pendency of the project), unless significant delays occur.

3. Elimination of the requirement to model an alternative with greater GHG emissions-related mitigation than the preferred alternative.

As originally formulated, the GHG Policy required proponents to prepare a GHG emissions analysis that calculated and compared GHG emissions associated with: 1) a Massachusetts Building Code-compliant baseline (the sum of direct emissions from stationary sources and indirect emissions from energy consumption and transportation); 2) the proposed preferred alternative (the sum of direct emissions from stationary sources, indirect emissions from energy consumption, and transportation for the project as proposed); and 3) a project alternative with greater GHG emissions-related mitigation than the preferred alternative.

Many practitioners participating in the working group indicated that they had encountered challenges in complying with this requirement. Specifically, some proponents have found it difficult to identify a project alternative with greater GHG emissions-related mitigation than the preferred alternative that can also be considered realistic, because the proponent may have already adopted every measure it considers feasible as part of the preferred alternative. The purpose of the requirement was to ensure that the proponent gave serious thought to all available alternatives, and that the permitting Agencies and MEPA reviewers could understand the costs and benefits of those alternatives. The MEPA office believes that this purpose can be achieved without requiring a proponent to present and model an unrealistic alternative. As a result, the revised Policy no longer contains the requirement to model this third mitigation case. However, project proponents will still be required to evaluate a range of mitigation alternatives/technologies to determine if they are feasible and to calculate potential emissions reductions associated with the measures. In other words, this policy change uses a different tool to achieve the underlying purpose of ensuring a comprehensive analysis of the costs and benefits of different alternative GHG reduction measures.

4. Clarification of methodologies applicable to projects that do not involve the construction of buildings.

Feedback provided by the stakeholder working group indicated that the original GHG Policy placed too much emphasis on projects that involved commercial or residential real estate development, and did not clearly enough specify the methodologies applicable to projects that involve, for example, industrial processes rather than construction of buildings. This would include, for example, power generating processes or manufacturing processes. The revised GHG Policy now provides clarification on this issue by separately addressing the baseline and emissions calculation methodologies applicable to projects that involve construction of buildings and other types of projects. However, the Policy has not attempted to address the methodology that might be applicable to every conceivable type of project subject to MEPA review. For projects that are relatively unusual, the baseline and emissions calculation methodology will need to be established on a case-by-case basis as appropriate in consultation with the MEPA Office.

5. Categories of emissions required to be quantified.

Since the issuance of the original GHG Policy in 2007, certain stakeholders have recommended that the Secretary consider expanding the categories of emissions that proponents are required to quantify under the Policy. The current version of the Policy requires project proponents to quantify both “direct” GHG emissions (*e.g.*, stack emissions from the proposed operation) and “indirect” emissions (*e.g.*, emissions from vehicles driven by employees and generating plants supplying electricity to the proposed operation). While this covers the vast majority of GHG emissions associated with a project, it does fall short of a full “life-cycle analysis” of GHG emissions, which would be difficult to calculate reliably. It has been suggested that the Secretary consider additionally requiring quantification of construction period emissions, emissions associated with materials consumption and waste generation, emissions associated with water consumption and wastewater generation, and emissions associated with land alteration and conversion of carbon-sequestering biomass to waste or fuel.

Although the MEPA Office recognizes that there are additional indirect GHG emissions associated with these aspects of proposed projects, after considering the benefits associated with accounting for these additional marginal emissions and the costs to proponents of generating the additional data, the revised Policy retains the approach used in the original policy with minor modifications. Feedback provided by participants in the stakeholder working group indicated that emissions associated with these additional sources are likely to comprise only a small percentage of the project’s total GHG emissions. Conversely, because the sources of emissions are more attenuated to the project, it is difficult to arrive at an accurate estimate of the likely emissions associated with these sources. In many cases calculating an estimate would involve the use of numerous assumptions about occurrences outside the direct control of the proponent which undermines the usefulness of the data. In short, the effort and cost associated with making these calculations may outweigh their usefulness in many instances.

However, in response to numerous comments received on this topic, the Policy has been revised to make clear that under certain specific circumstances, quantification of these emissions is justified and will be required. This will typically be cases where these additional indirect sources of emissions are expected to comprise a non-trivial component of the project’s overall emissions. For example, very large users of water or generators of wastewater will be asked to quantify the emissions associated with treating water and wastewater associated with the project. MassDEP has been engaged in a multi-year effort to analyze and upgrade the efficiency of water treatment facilities and therefore has reliable data on the likely energy use and resultant GHG emissions associated with these activities. Similarly, if a project involves an unusually large amount of land clearing or deforestation, the project will be required to quantify the emissions associated with conversion of that carbon-sequestering biomass to waste or energy. The MEPA Office will work with project proponents in these limited cases to develop an appropriate methodology.

It should also be noted that although proponents will not be required to quantify these additional categories of emissions in most cases, MEPA always requires proponents to mitigate impacts to the maximum extent feasible. Therefore, applicable mitigation measures related to these topics (*e.g.*, water conservation, materials management, limiting land disturbance, etc.) will

still need to be evaluated by project proponents (and adopted where feasible) in order to reduce impacts to the maximum extent feasible, even if the impact of these measures on the project's emissions will not be quantified in the EIR.

6. Self-Certification requirement and enforcement of GHG mitigation measures.

In implementing the GHG Policy over the past two years the MEPA Office, project proponents, and state Agencies have had to consider the question of how to make the proponent's GHG emissions mitigation commitments enforceable. The current practice of the MEPA Office is to require, as a condition of a Certificate finding that the project has adequately and properly complied with MEPA, that the proponent self-certify after construction of the project that it has either undertaken the specific GHG mitigation commitments outlined in the Single or Final EIR, or that it has undertaken equivalent emissions reduction measures that collectively are designed to reduce GHG emissions by the same percentage as the measures outlined in the EIR. Certain GHG-related mitigation measures might be attached directly to a permit condition and Section 61 finding (e.g., TDM commitments might be reflected in a Massachusetts Department of Transportation Access Permit) but building-related measures that are not directly related to an existing state permit would be addressed primarily through the self-certification vehicle. The Secretary asks that the requirement to provide the self-certification be included in the Section 61 Findings issued by state Agencies for the proposed project.

In considering this practice and other alternative ideas, some stakeholders expressed concerns that, because MEPA review takes place at a relatively early stage of design, it may be difficult for proponents to in fact achieve the estimated reductions, even utilizing all best efforts. For example, some building-related measures reviewed in the MEPA process may ultimately prove infeasible to implement during project construction. This is not a situation unique to GHG mitigation measures, and the MEPA regulations contain a Notice of Project Change (NPC) requirement to address this issue, but because this is a very new area of state environmental impact review, there may be technical challenges that have not yet been foreseen.

Several alternative options were considered by the stakeholder working group and the MEPA Office conducted extensive discussions with stakeholders and state Agencies concerning this issue. Following this outreach, and in response in particular to the technical challenges noted above, the Policy has been revised to explicitly retain the current language in MEPA Certificates requiring proponents to self-certify to the MEPA Office that they have complied with the MEPA GHG mitigation commitments outlined in their MEPA submittals and in the Secretary's Certificate. The revised Policy additionally requires that the permitting Agencies include this requirement to provide a self-certification to the MEPA Office as part of their Section 61 Findings for permits issued on the project (again, consistent with current practice).

Under the revised Policy, the MEPA Office will undertake the following process for continuing to evaluate this issue:

- Once a certain number of self-certifications have been received by the MEPA Office, MEPA and MassDEP will jointly convene a committee to review the certification submittals and select a certain sub-sample of those projects for auditing.

- In order to address the uncertainties associated with this new area of regulation, and the potential that the current system may pose challenges once projects meet the implementation phase, the goal of the audit process will be to obtain information on how successful proponents have been at implementing the GHG reduction measures they committed to, to identify any technical challenges inherent to implementing these measures, and to use the information generated to inform the continuing conversations about appropriate enforcement strategies. The information generated may also be useful to MassDEP and the Secretary in establishing the Administration's plans for economy-wide implementation of the Climate Protection and Green Economy Act under M.G.L. c. 21N.

The MEPA Office believes that this strategy of requiring self-certification of mitigation commitments, followed by selective inter-agency review of projects for the purposes of gathering information with an eye towards informing ongoing regulatory development is consistent with the GHG Policy's fundamental goal of encouraging proponents to conduct an early stage analysis of project-related emissions in an effort to identify all feasible alternatives that may have lower GHG emissions potential. As noted above, the current goal of the policy is not to achieve any specific target for emissions reductions and therefore this flexible self-certification approach that allows for changes to be made as the project moves from the planning stage to construction is reasonable.

7. Requirement to use an IRS-approved energy model for commercial buildings.

Based on input from the Department of Energy Resources (DOER), the MEPA Office has revised the GHG Policy to require project proponents to use energy models that have been approved by the United States Internal Revenue Service (IRS) for use in supporting deductions for energy conservation measures in commercial buildings. Protocols have been established by the National Renewable Energy Lab (NREL) to test the accuracy of various energy models. One such test is the ASHRAE 140 standard, which applies to commercial buildings, and which the IRS uses to qualify potential models. Use of models approved by the IRS will allow for a higher degree of confidence in the accuracy of the model. The current policy lists EQUEST, Energy-10, Visual DOE, and DOE2 as models approved for use by the MEPA Office, but also allows other models to be used. All of these are listed on the approved ASHRAE 140 list (which also doubles for IRS approval for tax purposes) with the exception of Energy-10 (which applies to commercial buildings under 10,000 square feet in size). The IRS-approved/ ASHRAE 140-listed models do not account for all building types, and in those cases the Policy allows other models to be used.

8. Changes to the Appendix of suggested mitigation measures and development of a GHG Mitigation guidance document.

Based on input from state Agencies, stakeholders and public commenters, the list of suggested mitigation measures included as an Appendix to the GHG Policy has been updated and refined to provide more specific guidance to proponents. As before, the list of measures included is not intended to be exhaustive, and the Secretary reserves the discretion to require analysis of any and all potential mitigation measures for a particular project, whether or not listed

in the Appendix. The Appendix is intended to be a resource for all project proponents subject to the Policy, not a mandatory list of measures that must be modeled for every project. It is not limited to measures that can be analyzed with energy modeling software and includes some measures whose GHG reduction benefits may be indirect or difficult to quantify. This list is also not limited to any particular project type. Proponents should make a reasonable effort to quantify the benefits of mitigation measures applicable to the project type and identified in the Secretary's scoping Certificate using available tools and resources.

Many of the measures listed in the Appendix will be included in a forthcoming MassDEP GHG Guidance Document, a web-based searchable document database intended to assist project proponents and state Agencies participating in the MEPA review process. It will provide detailed information on mitigation measures, implementation, applicability to particular project types and/or locations, cost-effectiveness and recommended methodologies for quantifying or assessing associated emissions reductions. Although this Guidance Document is not yet available, it is expected to become available during 2010.