From: Ted Dreier [mailto:teddreier@gmail.com]
Sent: Sunday, September 11, 2016 8:51 PM
To: Planning and Sustainability Commission <psc@portlandoregon.gov>
Subject: Please enact bold, binding language for PSC Fossil Fuel Zoning

Ted Dreier
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September 11, 2016

Dear Planning & Sustainability Commission,

Dear Member of the Planning and Sustainability Commission,

Thank you for the diligent effort and transparency with which the City is pursuing the implementation of its November 2015 Fossil Fuel Policy. The City's draft makes real progress towards the 2015 Resolution's goal to "actively oppose expansion of infrastructure whose primary purpose is transporting or storing fossil fuels in or through Portland or adjacent waterways." As a resident of Portland, I am proud to see City leaders working to make Portland an example that other cities can follow.

Thank you to the Bureau of Planning and Sustainability for its work in incorporating public input on its initial draft of the Fossil Fuel Terminal Zoning Amendments. The current draft is much improved, bringing the proposed changes much closer to the original intent of the 2015 Resolution. It is good to see the city making decisions that are not only environmentally responsible, but also responsive to citizen input.

However, the current Fossil Fuel Zoning Amendments proposal still falls short of the bold and visionary resolution that Portland supported in the fall of 2015, which called for the city to "actively oppose expansion of infrastructure whose primary purpose is transporting or storing fossil fuels in or through Portland or adjacent waterways." Although this draft prohibits new bulk terminals, it still allows new terminals up to 5 million gallons, provided that the terminal cannot shift fossil fuels from one transportation mode to another (i.e. rail to marine). The City's policy was clear, and new fossil fuel facilities that can store 5 million gallons of dangerous fossil fuels such as liquefied natural gas (LNG) or crude oil undermine the promise and impact of the City's 2015 Resolution.

Additionally, while this proposal will mark any bulk terminal as 'non-conforming', it still needs to strengthen the regulations when it comes to the expansion of pre-existing terminals. It is not clear from the draft if there is any binding limit to potential expansion at existing bulk fossil fuel terminals. The City's intention with its 2015 Resolution was to ensure that changes to the City's fossil fuel infrastructure would be used to improve safety, seismic resiliency, and the use of lower-carbon fuels.

To make the City's policy as strong as it can be, I ask the City of Portland and the Planning and Sustainability Commission to consider the following:

- Enact a full ban on all new fossil fuel terminals, large or small. After all, this was the plain language of the City's 2015 Resolution - "to actively oppose" new fossil fuel infrastructure.

- An exception for new facilities that are 5 million gallons or less is unnecessary and could allow more unit trains of dangerous fossil fuels like Bakken crude oil. Additionally, allowing new LNG storage in Portland is unnecessary: NW Natural has no current plans for more LNG storage in Portland.

-Strengthen restrictions on expansions allowed at existing terminals through adding binding limits as well as criteria for safety and climate impacts in the City's non-conforming use review process. The

City should use this process to ensure that seismic and safety improvements are the basis for any new changes to Portland's existing bulk fossil fuel terminals.

-Add language to prevent smaller related "terminals" from clustering and aggregating to increase fossil fuel shipments through Portland.

Now more than ever, the City of Portland has the opportunity to be a leader in the U.S. climate justice movement. With just a few more improvements to the Fossil Fuel Zoning Amendments, Portland could once again be on the forefront addressing the most pressing concern of our time.

Sincerely,

Sincerely,
Ted Dreier