

Working Waterfront



C O A L I T I O N

September 13, 2016

Portland Planning and Sustainability Commission
City of Portland
1900 SW 4th Avenue, Suite 7100
Portland, OR 97210

Subject: Proposed Draft of Fossil Fuel Terminal Zoning Amendments

Dear Portland Planning Commissioners,

The Working Waterfront Coalition (WWC) opposes the proposed Fossil Fuel Terminal Zoning Amendments, (draft dated August 12, 2016). The WWC and several of its members have repeatedly met with City of Portland representatives as these amendments moved from concept to draft code language. The WWC continues to oppose any zoning code amendment that would make existing multimodal fuel terminals nonconforming uses, or that would in any way limit these critically important energy facilities from serving as a distribution hub for the region, the state and for other states in the Pacific Northwest.

We further agree with the comments contained in the September 7, 2016 letter from Frank Holmes, Director of the Northwest Region of the Western States Petroleum Association (WSPA) to the Portland Planning and Sustainability Commission (PSC), and adopt his comments as our own.

We note that we are in receipt of an email from Steve Kountz dated September 12, 2016 transmitting a memo from Steve Kountz and Tom Armstrong dated September 9, 2016 to the PSC, indicating that Bureau of Development Services (BDS) has confirmed what the WWC has been saying for several months, namely that "expansions of existing terminals may not be possible through a nonconforming situation review." In response to this fundamental flaw, Mr. Kountz mentions two concepts, which he refers to as the "Limited Use" alternative and the "Conditional Use" alternative. These alternatives are not discussed in any detail in the related memo, nor is any specific code language proposed in support of these alternative. In essence these "alternatives" are mere concepts. Accordingly, we have nothing of substance to review in that regard. If the PCS is interested in exploring these alternatives proposed by the Bureau of Planning and Sustainability (BPS), the WWC requests that this hearing be continued for a period of at least 30 days to allow staff to prepare proposed code language to support these alternatives and for stakeholders to have a meaningful opportunity to review and comment on the resulting code language. Thank you for your continued attention to this important matter.

Sincerely,



Ellen Wax, Executive Director
Working Waterfront Coalition

Established in 2005, the Working Waterfront Coalition, with its extensive knowledge of harbor industry needs and active industry participation, is dedicated to working with its partners to ensure an appropriate balance between environmental concerns and the needs of river-related, river-dependent employers. Portland's Harbor is a vital employment area: home to thousands of valuable high-wage, high-benefit jobs. In addition, WWC members are conscientious stewards of the environment, making significant investments in the harbor consistent with state and federal laws.