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**To:** Planning and Sustainability Commission <psc@portlandoregon.gov>

**Subject:** Comments on Portland's Fossil Fuel Export Policy submitted to the Bureau of Planning and Sustainability

Comments on Portland's Fossil Fuel Export Policy submitted to the Bureau of Planning and Sustainability

On behalf of Center for Sustainable Economy

September 16, 2016

Fossil fuels pose risks at every stage of their life cycle--from extraction, to transport, to storage to combustion. One risk that is of particular concern to the City of Portland is the risk of a catastrophic explosion in the event of a 9.0 magnitude earthquake. The entire industrial area of Portland, including the entire region where oil, gas and other chemicals are stored, is in a liquefaction zone. Should a quake hit, this region is particularly vulnerable to a catastrophic explosion, one that could set much of the city and the Willamette River on fire.

Northwest Natural and other fossil fuel industry representatives have submitted that the only way they will seismically upgrade their facilities is by way of expansion. The latest BPS code draft suggests a 10 percent increase of existing infrastructure may be acceptable. However, an expansion of existing facilities poses an additional and unacceptable risk to the Portland metropolitan area. Though we appreciate the concern of PSC over the possibility of disallowing seismic upgrades, we don't share the belief that the only way to incentivize upgrades is through allowing the expansion of fossil fuel infrastructure. In fact, this issue is more fit for subsequent city processes that should originate outside of the land use context. To this end, we are pleased to learn from BPS that they will recommend subsequent process of review of fossil fuel infrastructure policy and that additional studies and hearings will address the issues of seismic safety. We propose that, at the point in the review process when seismic safety is addressed, the City explore the option of imposing fossil fuel, or more generally, dangerous infrastructure risk bonds. We are [attaching, for your information, an outline of the concept of a fossil fuel risk bond](#). There is no reason that the City should accept that the only way we can protect health and safety by reducing catastrophic risk to the public is by allowing more of a dangerous activity.

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