

From: [Cathryn Chudy](#)
To: [Planning Commission](#)
Cc: [Eiken, Chad](#); [Snodgrass, Bryan](#)
Subject: ACE Coalition Initial Comments on Draft Fossil Fuel Facilities Proposed Code Changes
Date: Monday, July 11, 2022 6:22:52 PM
Attachments: [ACE Comments to Planning Commission Fossil Fuel Ordinance July 2022.pdf](#)

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Vancouver Planning Commissioners, City Staff and BERK Consulting,

Please see attached comments on behalf of the Alliance for Community Engagement SWWA (ACE), submitted for the "**Updates to Fossil Fuel Storage Regulations**" **Workshop on Tuesday, July 12, 2022.**

Thank you,

Cathryn Chudy, on behalf of ACE

July 12, 2022

To:

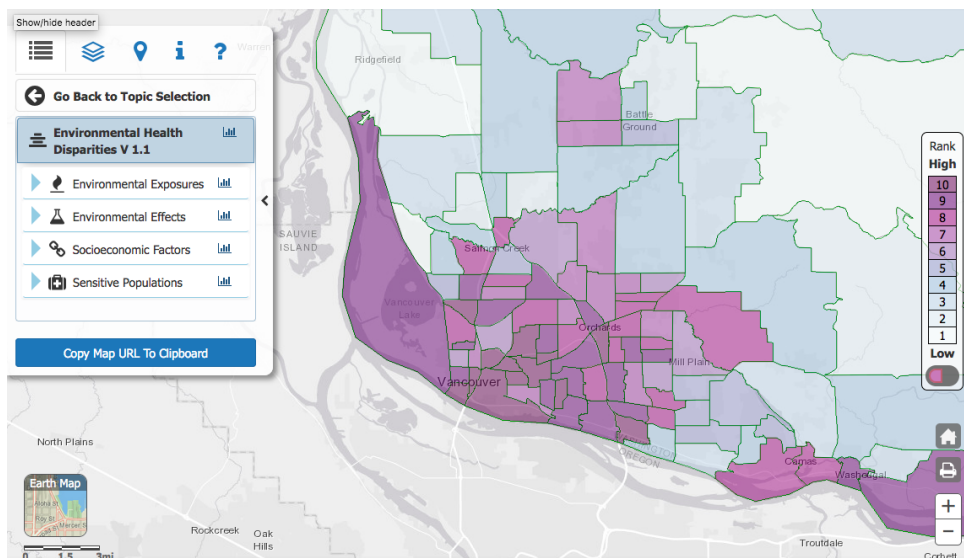
City of Vancouver Planning Commission
Chad Eiken, CDD Director
Bryan Snodgrass, Principal Planner, CDD
Lisa Grueter and Jason Hennessey, BERK Consulting

Subject: ACE Coalition Initial Comments on Draft Fossil Fuel Facilities Proposed Code Changes

Hello Commissioners and Staff,

Thank you for your ongoing work to develop a permanent, targeted ordinance against new or expanded bulk fossil fuel infrastructure in Vancouver. The draft code changes developed by staff based on years of Council direction and intent expressed in the current fossil fuel moratorium represent an important step forward for Vancouver in protecting community health and safety from fossil fuel facilities.

Communities of color and low-income communities in Vancouver already experience some of the most significant environmental health disparities in Washington, which would only be exacerbated by any new or expanded fossil fuel facilities.¹ The proposed ordinance would improve air quality and equity, and increase resilience across Vancouver.



Source: Washington Environmental Health Disparities Map. July 2022.

Specifically, we support the prohibition of new bulk fossil fuel storage and handling facilities, and the limited and conditional allowance for expansions only for the purpose of cleaner fuels and with strong special use requirements including seismic upgrades, spill prevention and fire response plans, and financial assurance. The requirements to establish capacity baselines and report annually on storage and transport, as well as the clear prohibition

¹ Washington Department of Health. Environmental Health Disparities Map. <https://fortress.wa.gov/doh/wtnibl/WTNIBL/>. Accessed 7.11.2022.

on conversion back to fossil fuel uses, are also strong and necessary accountability mechanisms in the code.

However, we also request additional clarifications and assurances from staff on the following issues to ensure the draft code achieves its intent to protect community health and safety from expanded fossil fuel transport, storage, and handling in Vancouver:

- **Volumetric threshold:** While the draft code uses a two million gallon threshold, other communities across Washington enacting similar protections have utilized a one million gallon threshold in defining a significant facility. Vancouver should similarly adopt a one million gallon threshold to ensure the regulations also cover the Tidewater facility, which under the current regulation could potentially expand roughly 50% before being subject to fossil fuel capacity restrictions and new special use standards.
- **Petrochemicals:** How would the proposed code changes treat new or expanded facility petrochemical proposals similar to the recently proposed—and now canceled—Kalama methanol refinery, which was purportedly for plastics production but clearly had the potential to produce fracked gas-based methanol for fuel.² The Bulk Fossil Fuel Storage and Handling Facility definition exempts “facilities that store and handle finished products derived from fossil fuels including but not limited to asphalt, plastics, fertilizers, paints, and denatured ethanol.” Fracked gas-to-methanol refineries pose many of the same health and safety risks as traditional refineries, produce methanol for fuel use, and should be clearly prohibited in the adopted ordinance. Similarly ammonia, which has been traditionally considered a fertilizer, is increasingly being used as a fuel.³ Vancouver should consider the local health and safety impacts, as well as end use, of this product in the local permitting process.
- **Cleaner fuels definition:** The proposed cleaner fuels definition introduces ambiguity for fossil fuel-based alternative fuels that could fall under both the definition of “petroleum” and “cleaner fuels” in the draft code. Chapter 20.150 Definitions, Cleaner Fuels, section G. clarifies that, “restrictions on petroleum including in gaseous form, and petroleum fuel facilities, shall apply to such Alternative fuels and all references to hydrogen in this chapter are limited to green hydrogen.” What is the effect of this clarification on the regulation of storage and transport of liquid fuels, including LNG and LPG, which could fall under both the definition of “petroleum” in the code and the definition of Alternative Fuels under RCW 19.112.010(2)? We also recommend the petroleum definition be amended to specifically include fracked-gas based methanol, and that the cleaner fuel definition specify that “green hydrogen” refers specifically to electrolytic hydrogen produced using renewable electricity.

A strong bulk fossil fuel ordinance should protect community safety and health, without loopholes that allow for unnecessary expansions or changes of use that create new health, safety, or environmental impacts. We are encouraged by the strong draft code and urge the Planning Commission to move this ordinance forward without delay. Thank you for your work in securing a healthier, safer and more equitable future for Vancouver.

² Molly Soloman, OPB, *Controversial Kalama Methanol Plant May Be Misleading Public, Regulators*, <https://www.opb.org/news/article/methanol-plant-kalama-fossil-fuel-china/>.

³ <https://oilprice.com/Alternative-Energy/Renewable-Energy/The-Green-Ammonia-Boom-Is-Coming.html>

Sincerely,

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From: ssilvey643@aol.com
To: [Planning Commission](#)
Subject: comments for July 12 meeting
Date: Tuesday, July 12, 2022 7:34:23 AM

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PlanningCommission@cityofvancouver.us

Sirs:

Climate action plan,

One thing that many forget is how little we are, meaning that action by a few effect the economic benefit of many. I implore the group to look at the big picture in that when due to action it becomes un- economical for people they lose jobs, and jobs means taxes and fewer taxes mean cuts in government.

Further how many people live in our city? How is it that since we do not live in a bubble, your effects going to work? When 7 billion other people are not under your control? These people can do as they please for their economic benefit while some in this community can feel good by proclaiming false promises.

That said:

Slide 4: what is base line? What is population of baseline, thus with increase, is this 100% but have no base line so who knows? False data....

Slide 5: so you want to set history? Do you have enough jobs in the community to support the community or is our quality of life to go backwards?

Slide 12: this is wrong per EPA, I see no agriculture, and other contributors, especially outside influence such as shipping, and mills.

Why it appears that slides are missing and out of order, there is no substance real data in them. It is as if someone lives in a bubble and this is all you think of, and not looking at bigger picture, going all electric when in fact you have groups wanted to eliminate dams, and that WA does not give green points to dams and power generated. Where does it come from? And batteries, has anyone really looked at that cost and effect to environment or is it that it is not in your backyard so you do not care and thus again promote a false sense of dong good.

City Building code:

As for the change to city zoning code and so forth since the planning department has limited parking for residence is that listed and set to be legally signed when properties change hands, so all know they have no parking, and that the city does not value ones time.

Fall 2022 amendments:

So when the school is gone and higher density housing goes in, is there a place for children to walk to school, or are these now bused, adding to climate effect?

Fossil fuels,

When the actions prevent constructions and new plants to transport and distribute it harms all. Again why is it that some think they live in a bubble, the action or preventing a cleaner burning coal to move through the city, or building of new beneficent refinery prevent the economic benefit and overall benefit to the environment. As I have stated, we do not live in a bubble and last time I was out winds comes from the Ocean, and the rest of world is across those oceans, thus contributing to our air.

Steven Silvey

Vancouver, WA