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To: [Rud Browne](#); [Barry Buchanan](#); [Satpal Sidhu](#); [Barbara Brenner](#); [Todd Donovan](#); [Timothy Ballew](#); [Tyler Byrd](#)
Cc: [Mark Personius](#); [Matt Aamot](#); [Dana Brown-Davis](#)
Subject: Changes being considered today to pipelines in Title 20
Date: Tuesday, September 11, 2018 12:56:26 PM

Hi you Honorable Councilmembers,

I see you are considering some changes to the Public Utility Chapter of Title 20 regarding pipelines, so would like to suggest a couple changes to the proposed wording.

In 20.82.030 (1) I would suggest you change the wording to:

(a) Replacement pipelines **in the same right-of-way** that **do not increase the capacity of** ~~are no larger than~~ the pipelines being replaced, ~~which are permitted.~~

In 20.82.030 (2) make the same change

(a) Replacement pipelines **in the same right-of-way** that **do not increase the capacity of** ~~are no larger than~~ the pipelines being replaced, ~~which are permitted.~~

The reasoning for this is:

Sometimes pipeline companies replace pipelines by putting them in an entirely different location, impacting new landowners and critical areas. My proposed language would require a Conditional Use permit if that was their intention.

Also, it is possible to increase the amount of fuel (capacity) moving through a pipeline without changing the "size" of the pipeline. For instance, you could replace on old thin walled 16 inch pipeline with a new thick walled 16 inch pipeline and then increase the pressure to push lots more fuel through that same size pipeline. If they are trying to increase the amount of fuel moving through the pipeline, even the same size pipeline, I think that should require a conditional use permit since it also increases the potential human and/or environmental risk.

I don't understand the point or need for the clause "which are permitted" so I suggest you remove it for clarity

I will try to wander over there this afternoon in case you have questions, but in case I don't make it I want to share these ideas.

Thanks

Carl

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