

My name is John Risser. I'm a taxpayer and citizen of Whatcom County and I'm concerned about the mess our elected officials in the Council are about to get us into.

I have two points to make.

First, please understand that these regulations will increase, rather than decrease, greenhouse gas emissions – maybe not locally, but globally. Requirements placed on the two Whatcom refineries, for instance, will only help Skagit and California refineries boost their production, or worse yet, divert supply sources to high-polluting Asian refineries with long-haul shipping to Washington. Every one of these refineries emits more CO2 per barrel than P66 or BP, so while the county would succeed in stifling growth at our own local refineries, it'll only shift production to less responsible refiners – hurting both the local economy and the global environment. Ironically, renewable energy projects that could be done here will be frustrated with delays, roadblocks and penalties. This proposal is counterproductive to solving the global greenhouse gas problem. Please don't let the Council "spare the county just to spite the globe".

And second, I believe the proposed amendments are impractical, vague, and highly inconsistent with federal and state law – ripe for litigation, on many fronts. If you don't dramatically improve these proposed amendments you'll be ushering in years of taxpayer spending on legal defense – a complete waste of all our money.

- I'm frustrated that this process has been far from transparent or collaborative, which represents a complete breach of due process. This is the 14th version of these Amendments that the County has considered over the last 15 months, giving little opportunity to digest the ever-shifting blur of proposals.
- The County's attempt to become a regulator of greenhouse gas emissions will unlawfully conflict and interfere with the ability of federal and state air regulators to carry out their statutory mandates. Is the County really ready for a fight with Ecology and NWCAA?
- And the Council's scheme for taxing refineries for emissions from "upstream" activities it neither caused nor controls is haphazard at best, and illegal and discriminatory at worst – a violation of interstate commerce laws.

Please – work with, don't shut out, the industries you're trying so desperately to regulate. At the very least, the County should postpone adoption of these amendments until it completes an Environmental Impact Statement. Not doing so represents a hypocritical breach of due process.

All of this started with a stated desire to prevent crude oil transloading through the Puget Sound – but has now been morphed into a "leave it in the ground" mission from a bully pulpit. I believe this approach is irresponsible and reckless, and will lead to expensive litigation paid by my taxes. We can do so much better. I am counting on you to help make this better.

Thank you.