

From: [Jeff Warne](#)
To: [PDS Planning Commission](#)
Subject: Changes to the Comprehensive Plan
Date: Wednesday, September 11, 2019 3:35:24 PM

1. Has the Whatcom County Council considered the impact on supply of these restrictive proposed rules on Washington as a whole? Have you coordinated with King County to determine how this will impact their ability to run an international airport in their city without Cherry Point refineries? Cherry Point manufactures most of the jet fuel used by SeaTac, Portland, and Vancouver. If these businesses' processes are negatively impacted by the heavy administrative burden Whatcom County wants to add to the permitting process, the refineries will be less competitive. With the heavy tax burden already put on the refineries in Washington it could become prohibitive for their companies to further invest in them, which would eliminate the ability to innovate the renewable energy solutions required to meet the dual challenge of the carbon crisis.

2. Conditional Use Permit sections – This change in policy will not only increase administrative costs and project lead times for the refineries, but also for the County. What is the organizational structure that will administer this? Major Projects would be required to be approved by the County Council, who do not have the technical (engineering, science) background to be considered qualified to make final decisions. The County will be able to make conditions or deny project applications based on subject criteria. This makes it a political process instead of a regulatory one.

3. The insurance requirement is unrealistic. The wording in the Comprehensive Plan is vague concerning the ability for ANY company to afford such an insurance policy. You can't buy insurance for somebody else's activities. The insurance plan as stated insures the supply chain, which is already insured. These Cherry Point companies have proven reliable when needing to live up to their obligations.

Thank you for your time and consideration on these matters.

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