

**From:** [Eddy Ury](#)  
**To:** [Chalfant, Jeff](#); [Matt Aamot](#); [Mark Personius](#); [PDS Planning Commission](#); [Ashley Ubil](#)  
**Cc:** [Brady, Pamela](#); [Verburg, James E](#); [Landgraf, Christina](#); [Johnson, Tim](#); [Andrew Gamble](#); [Brown, Brad J](#); [Gavin Carscallen](#)  
**Subject:** Re: Renewable Fuels Transshipment Definition Proposal  
**Date:** Thursday, August 13, 2020 4:28:01 PM

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Commissioners et al,  
RE Sources has no objections to the substitute definition of Renewable Fuel Transshipment Facility presented by Jeff Chalfant as shown below:  
*“Renewable Fuel Transshipment Facility” is a facility engaging primarily in the process of off-loading renewable fuel from one transportation method (such as a ship, truck, or railcar) and loading it onto another transportation method for the purposes of transporting the renewable fuel into and out of Whatcom County. This definition shall include bulk storage or transfer facilities for the shipment of renewable fuels without refining or consuming within the Cherry Point Industrial District and shall exclude Small Renewable Storage and Distribution Facilities.*

This definition mirrors our jointly proposed definition for "Fossil Fuel Transshipment Facilities," as shown in the agenda packet for today's Planning Commission meeting. The version presented in the Aug 12th PDS memo is, by contrast, subtly different in potentially significant ways that would create inconsistency in how transshipment facilities for different fuel types are defined.

Additionally, following up on the issue discussed in the last two PC work sessions, addressing bp's request to clarify that upgrades for co-processing non-fossil feedstocks are permitted uses, we do have a proposal which all stakeholders found agreeable in our recent meetings this past month.

Add language in red as follows:

**WCC 20.68.068** (HII District - Permitted Uses)

...

**(8)** Environmental improvements and other projects required on the subject site by federal, state, regional, or local regulations, **including modifications of fossil fuel facilities for purposes of co-processing biomass with petroleum.**

...

**(22) renewable fuel production and shipment**

As I stated in previous comments, the July 10th draft of Cherry Point Amendments places no new restrictions, conditions or prohibitions on renewable fuel refining and shipment projects for new or existing facilities; they are already permitted uses. However, given the repeated requests to clarify this more explicitly, we support the above language.

Thank you for your thoughtful consideration of our comments and for continuing in dialogue with stakeholders throughout this long process.

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**Eddy Ury**  
Climate & Energy Policy Manager

RE Sources for Sustainable Communities  
Office: (360) 733-8307 ext. 215  
Mobile: (206) 972-2001  
[re-sources.org](http://re-sources.org) | [Facebook](#) | [Blog](#) | [E-News](#)

On Thu, Aug 13, 2020 at 3:17 PM Chalfant, Jeff <[Jeff.Chalfant@bp.com](mailto:Jeff.Chalfant@bp.com)> wrote:

Commissioners:

In response to the observation from Whatcom County PDS regarding a need for a separate definition for “Renewable Fuel Transshipment Facility” bp is proposing the following definition for consideration by the Whatcom County Planning Commission this evening:

*“Renewable Fuel Transshipment Facility” is a facility engaging primarily in the process of off-loading renewable fuel from one transportation method (such as a ship, truck, or railcar) and loading it onto another transportation method for the purposes of transporting the renewable fuel into and out of Whatcom County. This definition shall include bulk storage or transfer facilities for the shipment of renewable fuels without refining or consuming within the Cherry Point Industrial District and shall exclude Small Renewable Storage and Distribution Facilities.*

Unfortunately, with the time available we have not been able to obtain formal consensus among the various stakeholders on this specific definition; however, we believe that it is consistent with our prior discussions and the needs that have been previously expressed. That said, bp welcomes suggested edits to ensure that the concerns of the community, environmental groups and industry are appropriately reflected.

Thank you all again for the opportunity to provide feedback and assistance to this important process. Please let me know if you have any questions or concerns prior to the hearing this evening.

Kind Regards,

Jeff Chalfant

bp America

[Jeff.chalfant@bp.com](mailto:Jeff.chalfant@bp.com)

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