

Input to IPS on proposed amendments and renewable fuels language

Tideflats non-Interim Regulations

Lexi Brewer, STC Chair

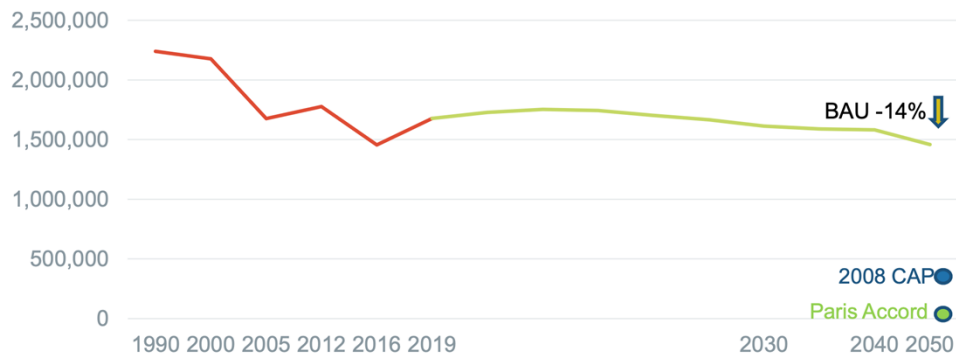
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Context Setting: Existing Policy & Climate Goals

- 2015 – Environmental Action Plan adopted, near term target of 40% below 1990 levels by 2020 (did not meet).
- 2017 - Mayor Woodards pledges to uphold Paris Agreement goals (limit warming to 1.5C)
- 2019 – City of Council declares a climate emergency, including carbon neutral city ops by 2050 and community goal of 80% reduction by 2050
- 2021 Climate Action Plan – Currently being updated, draft goal net zero by 2050

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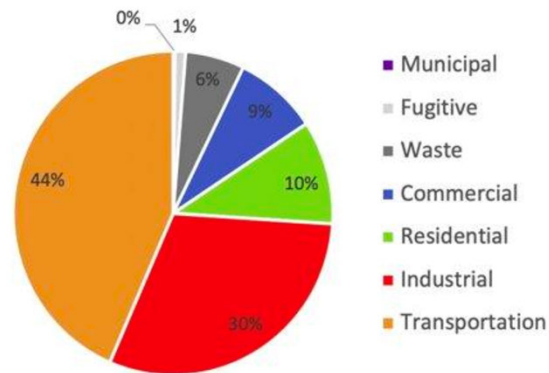
PAST & FUTURE EMISSIONS (TACOMA)



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Context
Setting:
Updated
Tacoma
Emissions
Inventory

2019 TACOMA COMMUNITY EMISSIONS



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What is the long-term overall goal?

- Eventual replacement of existing fossil fuel industries with low-carbon industries, not adding low-carbon industries on top of portfolio we have long-term.
 - Presenters 2-weeks ago made this clear – they anticipate a switch to renewables coming.

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STC Position

Agree with Planning Commission Recommendations on Fossil Fuel Use Standards

FOSSIL FUEL USE STANDARDS 			
	Before Interim	Interim	PC Recommendation
Limits on Expansion of Fossil Fuel Facilities	None	None	Yes, expansion of the following is prohibited: <ul style="list-style-type: none"> • refining, • storage, • transportation/ transshipment facilities
Conditional Use Criteria for Renewable Fuel	None	None	<ul style="list-style-type: none"> • Consultation • Health and Safety • Emergency Service and Response • Shoreline Resources/Impacts
Special Use Standards for Renewable Fuels	None	None	<ul style="list-style-type: none"> • Annual Reporting • Facility level greenhouse gas mitigation

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"Renewable Fuels" Definition

- **VERY STRONGLY PREFER** Planning Commission Draft Definition
 - Renewables not the target – Low Carbon Fuels is the target
- Specifics:
 - Approved by EPA Renewable Fuels Standard Program
 - Includes emissions target in definition
 - Leaves door open for adoption of a regional fuel standard
 - Adoption of future state or regional standard will be the standard most directly scaled to Tacoma
 - Renewable fuels must be proven to reduce GHGs

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"Renewable Fuels" Definition

- **SERIOUS CONCERNS** with proposed definition
 - "Fuels that meet requirements under federal or state programs"
 - Which programs? When? Any program?
 - "Including fuels that generate credits in Cap-and-Trade programs"
 - Which program? Any? Wouldn't such a fuel be included in a low-carbon fuel program anyway?
 - "and fuels which meet meet current and future definitions in State law for low carbon fuels, renewable fuels or renewable resources"
 - Confusing
 - **Goal is low-carbon fuels, not broader category of renewable fuels**

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“Renewable Fuels” Definition

- Issues for consideration and discussion
 - We haven’t seen the state standard yet
 - Exemptions to state standard not appropriate at local level – e.g. exemptions for fuels sold out of state, aviation fuels, marine fuels.
 - ***Different goals in these targets – state standard is addressing entire existing portfolio; these regulations addressing new or expanded uses.***

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Amendment Themes

Expansion of Existing Uses

- There should be no expansion of existing uses. We need to reduce our local investment in fossil fuels to meet our climate goals, not increase them in any capacity.
- Do not support setting a limit – should be prohibited.

Maintenance and Safety Upgrades

- No issues with maintenance or replacement of infrastructure for safety – if it does not increase overall capacity
- Want well-maintained infrastructure, and also don’t want to create a loophole

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Amendment Themes

National Security

- If proposed/existing facility has one small military contract (not a majority of operations), would that then make them exempt?
 - What would “majority of operations” even look like?
- Need clarity on specific scenarios in which regulations might be in conflict
 - E.g. timeline – we are talking about infrastructure, which takes time, so what is the specific scenario in which this would be an impediment to respond to a crisis?

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Amendments:

Marine Vessels Fossil Fuel Facilities/Aviation Fossil Fuel Facilities

- These facilities should be subject to same standards as other major fossil fuel facilities

Projects which have gone under environmental review and Mitigated Impacts

- Need more information and specifics well in advance to provide comment.

Use of CUPs for new and expanded renewable fuel facilities

- Strongly recommend using CUP process for new and expanded renewable fuel facilities
- Some facilities may not be appropriate fit for Tacoma’s overall goals; CUP process would allow for thorough vetting as to not grandfather in future incompatible facilities or uses.
- **Particularly if use proposed amended definition of renewable fuels, needs to go through CUP process.**

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General Comments

- Meeting area's energy needs
 - Our future involves moving away from fossil fuels
 - Ex. GM EV by 2035, WA proposed gas car ban by 2030
 - City's (and region's) own policies and action plans call for reduction carbon intensity of transportation
 - Ex. Update of EVs, use of mass and active transportation
 - Even with growth, demand is expected to **decrease** in future

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General Comments

- Conflicts with Sub-Area Plan
 - Intent of Interim and Non-interim regs is to preserve the widest possible array of futures for consideration in the Subarea Plan
 - Regulations that limit expansion or establishment of potentially incompatible uses in the future plan are necessary
 - Conflicts more likely to arise from status quo

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General Comments

- STC provided Recommendations for all Sections of Draft Regulations
 - Encourage IPS Committee members to review our letter from 3/3/2021