Emergency Fuel Management Plan FINAL Draft (April 2022)





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Record of Changes

Date of Change	Change(s) Made	Changes Made By



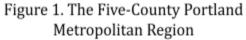
1. Purpose

The purpose of this plan is to describe the Multnomah County concept of operations for managing fuel during a minor, major, or catastrophic incident or event that curtails or disrupts the fuel supply, including the authorities, procedures, and organization roles

and responsibilities governing County decision-making. Estimated fuel needs are based on a comprehensive fuel assessment sponsored by Clackamas, Clark, Columbia, and Multnomah Counties in 2020. The plan aims to minimize the impact of fuel shortages on the County's emergency response capabilities and the operation of critical infrastructure, and emphasizes coordination among the five counties comprising the Portland Metropolitan Region in a fuel allocation process.

This Plan does not include provisions to provide fuel to the general population during or following an emergency event, but the





State of Oregon will provide that direction (see Priority Action 8 in the Oregon Fuel Action Plan).

2. Situation

Multnomah County is subject to a number of hazards that may limit the availability of fuel to support emergency response activities, infrastructure repair and restoration, and other essential community functions. Severe storms and major earthquakes causing widespread and protracted power outages have the potential to significantly affect fuel supply, transportation, and/or dispensing, as well as increase fuel demand for essential operations (e.g. debris removal, continuity of critical infrastructure). This plan addresses how fuel resources are acquired, prioritized, and distributed for emergency response organizations within Multnomah County.

The following subsections present findings from the 2020 fuel assessment regarding fuel import, access and distribution, fuel availability, and fuel usage in the Portland Metropolitan Region and in Multnomah County. For more information on the regional fuel supply chain and usage, see the Fuel Analysis Report.

2.1 Fuel Import, Access, and Distribution

Without any crude refining capacity, the Portland Metropolitan Region relies on imports of refined fuel products for its fuel needs. The predominant mode of import is by refined product pipeline, principally the Olympic Pipeline, which connects to refineries in Washington State. The other methods of bulk fuel import are via maritime transport and rail. Pipelines, ships, and rail deliver the refined fuel



products to petroleum product terminals, which are generally concentrated in the Critical Energy Infrastructure (CEI) Hub in northwest Portland.

Refined fuel is then typically loaded into tanker trucks and distributed to fuel stations, all requiring access to NW St. Helens Rd/US-30 and NW Front Ave. The limited access in and out plus the significance of the CEI Hub itself makes this a particular vulnerability for the Portland Metropolitan Region.

2.2 Fuel Availability

Fuel is typically stored in underground storage tanks (USTs) and occasionally in aboveground storage tanks (ASTs). Most stations in the region have three gasoline tanks – two regular and one premium – plus an additional tank of diesel, if offered. The amount of gasoline stored is consistent region-wide, ranging from 20,000-50,000 gallons. The amount of diesel fuel stored varies. It is typically stored in small quantities with some exceptions that of 50,000 gallons and even 100,000 gallons, such as at Jubitz, Flying K, and select cardlock stations. In addition to retail stations, private sector fuel users store their own fuel for fleets, equipment, industrial processes, or other uses. In fact, these users hold over 35% of private sector diesel in the study area. The most common brands of retail fuel stations in the region are Chevron, Shell, 76, and Arco; Pacific Pride and Commercial Fuel Network (CFN) are important cardlock facilities.

2.3 Fuel Usage

If the local fuel supply is disrupted, Multnomah County is likely to still operate fleet services and generator equipment for a period of time depending on how full their storage tanks are at the point of disruption. Once storage is depleted, however, the situation changes. Peak daily emergency fuel needs across the four Portland Metropolitan Area counties could approach 23,000-gallons per day (gpd) of gasoline and 310,000-gpd of diesel for county and local government vehicle fleets and the critical infrastructure site types within the scope of the analysis (medical, local government, fire districts, and some utility infrastructure). For Multnomah County specifically, estimated peak daily emergency fuel needs could approach 10,300-gpd gasoline and 82,000-gpd diesel.

Tables 1 and 2 depict the total average and peak daily fuel usage for diesel and gasoline by county and fuel user group



	Clackamas		Columbia		Multnomah		Clark	
User Type	Avg.	Peak	Avg.	Peak	Avg.	Peak	Avg.	Peak
Local Gov Fleets	412.3	643.3	42.2	160.6	2,345.4	5,564.3	310.4	708.2
County Gov Fleets	377.5	377.5	51.5	51.5	152.4	152.4	385.0	385.0
Fire district Fleets	138.6	312.6	58.8	210.8	5.0	40.0	43.8	106.5
Other Public Sector Fleets	156.3	400.8	0.0	0.0	16,301.4	20,889.1	31,350	39,840
Unsurveyed LG/County Fleets	79.4	181.5	4.1	9.4	18.3	41.8	25.8	59.1
Unsurveyed Fire Dist. Fleets	82.9	210.5	46.9	119.2	32.4	82.3	198.8	504.8
Generators (surveyed)	7,472	15,031	135	265	32,155	65,257	6,018	12,232
Generators (unsurveyed)	22,743	36,930	12,4 58	24,694	41,206	81,871	19,688	39,202
Total	11,530	22,893	338	816	45,850	81,725	9,941	17,630

Table 1. Total Diesel Fuel Needs by County and Fuel User Group (Gallons Per Day)

	Clackamas		Columbia		Multnomah		Clark	
User Type	Avg.	Peak	Avg.	Peak	Avg.	Peak	Avg.	Peak
Local Gov Fleets	798.4	1,169.2	192.7	392.4	3,323.0	5,747.0	1,060.1	1,842.2
County Gov Fleets	915.4	1,996.4	102.0	222.5	856.9	3,890.7	1,933.0	3,372.0
Fire district Fleets	65.2	664.2	46.7	184.6	3.0	25.0	22.1	80.6
Other Public Sector Fleets	56.8	154.8	0.0	0.0	383.6	431.8	377.0	870.0
Unsurveyed LG/County Fleets	199.6	335.8	31.4	14.6	38.8	65.3	54.8	92.2
Unsurveyed Fire Dist. Fleets	28.8	170.3	27.2	161.0	18.6	110.2	116.3	688.3
Total	2,064	4,491	400	975	4,624	10,270	3,563	6,945

 Table 2. Total Gasoline Fuel Needs by County and Fuel User Group (Gallons Per Day)

As noted in the Fuel Analysis Report, average daily and peak daily demands for diesel and gasoline fuel offer a starting point for planning as these figures can help



the counties estimate the amount of fuel that must be sourced to support critical infrastructure and disaster response.

2.4 Fuel Provider(s)

The following fuel providers are being used by Multnomah County Government as of October 1, 2021 (specific contact information can be found in Tab 14: Statewide Point Contacts).

- Carson Oil
- Christensen Inc.
- PDX Fleet
- Petrocard

Specific point of contacts can be found in Tab 11: Statewide Points of Contact.

2.5 Fuel Types

When planning for fuel in a disaster, it is important to consider all fuels that may be used. The County has identified the following fuel types that may be needed in a catastrophic event:

- <u>Unleaded Gasoline</u> Automobiles, motorcycles, some light trucks, small boats, and in many types of powered tools and generators
- <u>Ultra-Low Sulfur Diesel</u> Automobiles, trucks, farm equipment, boats, construction equipment, railroad locomotives, and emergency generators
- <u>Aviation Gas</u> Airplanes and helicopters
- <u>2-Cycle Fuel</u> Outdoor equipment such as chainsaws, some motorcycles, some ATVs, and some watercraft
- <u>Non-ethanol (clear premium)</u> small engines
- <u>Kerosene</u> Space heaters, cooking appliances, and lamps
- <u>Heating Oil</u> Residential and small business heating
- <u>Heavy Fuel Oil</u> Industrial operations and marine vessel power plants
- <u>Marine Diesel Oil</u> Larger marine diesel engines
- <u>Jet Fuel</u> Jet turbine engines (fixed and rotary wing aircrafts)
- <u>Propane</u> Cooking, heating, alternative fueled vehicles, forklifts, agriculture (livestock heating, grain drying) blowtorches, and some small portable equipment and portable generator engines
- <u>Natural Gas</u> Heating, cooking, and alternative vehicle fuel.

The <u>Oregon Fuel Action Plan</u> takes into account unleaded, diesel, jet fuel, and propane. All other fuels are not considered an "emergency fuel" that the State is planning for (e.g., propane, kerosene, heating oil, 2-cycle oil, marine diesel oil),



however, additional fuel needs can still be requested through standard resource request mechanisms.

2.6 Understanding Local Fuel Needs

Understanding what local fuel needs will be during a disaster is critical to this planning effort. As a "priority user" it is important for Multnomah County to have an estimate of the amount of emergency fuel required to support the County's essential functions in advance of a fuel emergency. Understanding and being able to justify emergency fuel needs will enable the County's fuel needs to be incorporated in state fuel management planning and disaster response.

Calculating a fuel budget is straightforward in principle:

(Fuel Supply) ÷ (Fuel Consumption Rate) = (Operational Time)

However, in order to develop a fuel plan to effectively prioritize, allocate, and curtail fuel use during a disaster, it is important to determine the types of fuel uses, baseline fuel uses, and consumption rates during normal conditions. For the purposes of this plan, fuel uses are grouped into three main asset categories:

- **Facilities** Fixed assets on a parcel of land, including free-standing buildings, space in a multi-tenant building, and installed equipment such as emergency generators. Temporary field post structures should not be considered in this asset category; field posts will be constructed from equipment and transportation assets on an as-needed basis.
- **Transportation** Mobile, self-powered assets used for transporting people, supplies, equipment, and restoring critical lifelines and infrastructure. Transportation assets sometimes perform equipment functions, such as emergency power generation.
- **Equipment** Mobile assets, which in this context are self-powered, that primarily perform a non-transportation function. These assets include, as examples, construction equipment, farm equipment, outdoor power equipment, portable generators, heaters, cooking equipment, refrigeration, etc.



Fuel use, for emergency planning purposes, are grouped into two categories:

- **Baseline Fuel Consumption Rate** The current type and amount of fuel used during normal operations. Planned changes that will affect the baseline consumption rate, such as building additions, boiler replacements, changes in fuel type, or vehicle fleet changes, should be noted in the Fuel Use Assessment Tool.
- **Emergency Fuel Consumption Rate** The anticipated fuel use necessary for an department/organization (including its facilities, transportation, and equipment assets) to fulfill its purpose and role within the overall framework of the post-disaster response environment. Emergency fuel use accounts for changes in normal operational procedures that will be implemented in the event of a disaster, which may reduce or increase fuel demand.

Some entities may have established plans that detail emergency energy and fuel requirements and procedures and be able to provide quantitative values, while other entities may not have this level of information. Where this information is available, the emergency fuel demand can be calculated. In the absence of this information, understanding baseline fuel use (e.g. average, maximum, minimum etc.), supply (e.g. total storage capacity, average fuel on hand, etc.), and levels of emergency operation will help establish an order-of-magnitude estimate for fuel use.

Reference Appendix 15: Fuel Assessment Tool, to aid partners in calculating their fuel needs.

2.7 State, Regional, County, and Local Authorities and Plans

The following state, regional, county, and local, authorities and plans are relevant to emergency fuel management in Multnomah County:

- The *Oregon Fuel Action Plan* (October 2017) identifies the state's authority to manage fuel in an emergency and describes the actions the state will take under specific fuel shortage circumstances. The plan addresses both a catastrophic loss of fuel scenario (e.g., Cascadia Subduction Zone earthquake and tsunami) as well as a minor reduction of supply.
- The Oregon Resilience Plan, Section 6: Energy: Provides policy recommendations to make Oregon's critical infrastructure more resilient against a Cascadia subduction zone earthquake
- *Multnomah County Code, Chapter 25.410-490* authorizes the Chair of the Board of County Commissioners to suspend or restrict the sale of gasoline or other flammable or combustible liquids; curtail or suspend commercial activity; and shut down water, gas, or electric utilities.



3. Assumptions, Limitations, and Planning Considerations

3.1 Assumptions

The following planning assumptions include expected effects on Multnomah County from catastrophic hazard events that could create fuel shortages or disruptions in the Portland Metropolitan Area:

- A Cascadia Subduction Zone (CSZ) earthquake event or protracted severe winter storm will have widespread impacts on the region without regard to jurisdictional boundaries. Either event will significantly disrupt the fuel supply chain serving Multnomah County, potentially jeopardizing emergency response capabilities and critical infrastructure operations.
- There are currently no federal plans for fuel resupply of the Pacific Northwest in the event of a catastrophic earthquake resulting in serious, if not total, destruction of fuel supply chain components. Although federal capabilities exist (e.g., military) to provide fuel by air and sea, those capabilities have not yet been incorporated into a specific plan.
- The Critical Energy Infrastructure (CEI) Hub in northwest Portland is likely to be inaccessible, which will require the region to rely on smaller and more distant terminals.
- Large portions of the transportation infrastructure are likely to be damaged or destroyed, precluding their use for the transportation of fuel and leaving the only fuel available to that contained in vehicles and storage tanks within the County at the time of the event.
- Surface transportation damages in counties adjacent to Multnomah County may isolate cities, portions of cities, and other organizations from their supporting counties and require them to turn to Multnomah County for fuel and other logistics support.
- Rail systems in the region will suffer a significant reduction in or complete loss of operational capacity precluding their use for fuel resupply.
- Regional airports will sustain heavy damage and most likely will not be operational immediately after the event. Lighting, terminal facilities, control towers, terminal buildings, cargo handling facilities, and access roads, will likely sustain similar damage making them accessible only to small fixed-wing and rotary aircraft and limiting their use for fuel resupply until temporary repairs can be made.
- Electrical power and related communications outages will limit the ability to pump fuel from underground tanks.
- Due to widespread power outages, the use of emergency generators, which require fuel to operate, will place further demands on fuel supply.



- The State will provide guidance to the County on how the distribution of fuel to regional, state, and federal agencies and other organizations operating in and across multiple counties will be allocated and managed.
- The Oregon Department of Energy (ODOE) has estimated that based on planning for a CSZ event it may take three (3) weeks or longer to move fuel over the Cascades to coastal areas. This projection is consistent with the Oregon Resilience Plan.
- Less than one week of crude oil is available at the Alaska Terminal that supplies Washington's four refineries at any given time (Oregon does not have any refineries).
- The seven petroleum distribution terminals located in the CEI Hub in Portland are on a six-day refueling cycle.
- Viable road access to and from pre-identified Fuel Points of Distribution (FPODs) and fuel stockpiles, and power to access fuel supply at fuel sites, may be limited.
- Mandatory fuel conservation measures require an emergency declaration. There is no enforcement capability to require mandatory fuel conservation measures for the public.

3.2 Limitations

Limitations consist of actions either required (must do), or prohibited (cannot do), in fuel disruption or shortage situations. There are a number of limitations per current state and federal plans pertinent to managing fuel disruptions and shortages:

- It is imperative that Multnomah County work closely with the Oregon Department of Energy (ODOE), the Oregon Office of Emergency Management (OEM), regional governments, federal agencies, and the private sector to ensure its critical fuel needs are known and factored into fuel allocation decisions.
- If the State/federal government prioritizes fuel distribution and allocation local governments must follow that prioritization framework. However, the Oregon Fuel Action Plan does not specify how fuel will be allocated and distributed to federal and state agencies based in and/or operating in the counties.
- Multnomah County must prepare to allocate and/or coordinate limited or scarce fuel resources to countywide response partners.
- In the event of mass telecommunication failure, the county must develop alternative means of communication with the county-wide response and regional governmental partners.



4. Concept of Operations

4.1 General Response Actions During Fuel Disruptions

During any fuel supply disruption, Multnomah County response actions fall under two major steps: analyzing key topics related to the disruption and implementing response actions. Response actions are summarized in Figure 2 and the text below.

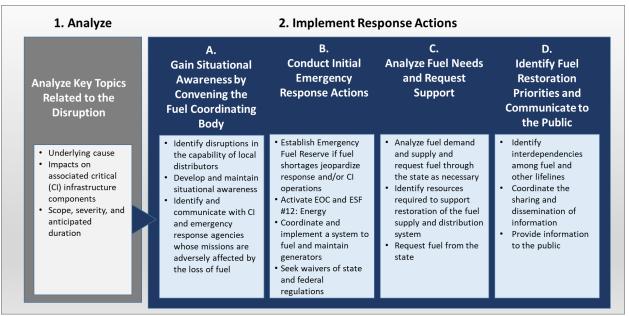


Figure 2. General Response Actions During Fuel Disruptions

Step 1: Analyze Key Topics Related to the Disruption. Multnomah County's response to any fuel supply disruption must determine the following before deciding on course(s) of action:

- The underlying cause of a fuel supply disruption;
- Direct and cascading impacts of the fuel supply disruption on associated critical infrastructure components (e.g., fuel storage facilities and access points, fuel tanker availability, fuel transportation routes, electrical power grid operations), and;
- The scope, severity, and anticipated duration of disruption to the fuel supply chain.



Step 2: Implement Response Actions. Based on an analysis of the fuel disruption, Multnomah County will implement response actions to manage the situation. General response actions may include:

- A. Gain Situational Awareness by convening the Fuel Coordinating Body to:
 - Identify disruptions in the capability of local distributors to receive, store, and distribute fuel.
 - Develop the demand for fuel, fuel inventory levels, and fuel supply restoration activities.
 - Identify and communicate with critical facilities and emergency response agencies whose missions critical essential functions are adversely affected by the loss of fuel.
- B. Conduct Initial Emergency Response Actions:
 - If a municipality, special district, or any other local emergency preparedness or response partner anticipates a fuel shortage based on a local emergency, they will notify the Multnomah County Emergency Management Office Duty Officer, or Director, with an initial assessment of fuel needs. The Multnomah County EOC will coordinate requests for support from regional partners or request additional support through the State.
 - Establish an Emergency Fuel Reserve if fuel shortages jeopardize emergency response and/or critical infrastructure operations within the County.
 - Activate the County EOC, Emergency Support Function (ESF) #12: Energy to coordinate the distribution of fuel reserves to priority critical response and infrastructure providers.
 - Coordinate and implement a system to fuel and maintain generators providing power to critical facilities and those providing essential services.
 - Seek waivers of state and federal regulations governing fuel acquisition, transfer, transport and use, and waive County regulations such as weight limits on county roads as appropriate (see Tab 7 for a list of waivers.)
- C. Analyze Fuel Needs and Request Support:
 - Analyze current fuel demand and supply, and request additional fuel through the state Emergency Coordination Center (ECC), if necessary.
 - $\circ~$ Additional notifications may be by the MCEM, or ESF #12, to:
 - ESF #12 supporting agencies as noted in the County CEMP.



- ODOE Duty Officer Program, 503-370-3500; ODOE Emergency Preparedness Manger, 503-932-4428
- Local fuel distributors and retailers, as noted in 2.4
- Identify resources required to support restoration of the fuel supply and distribution system within the county.
- D. Identify Fuel Restoration Priorities and Communicate to the Public:
 - Identify interdependencies among fuel and other lifelines that may impact restoration priorities.
 - Coordinate the sharing and dissemination of priority information regarding fuel supply restoration activities through the Fuel Coordinating Body.
 - Provide information to the public on conservation measures, service disruptions, fuel availability, rationing guidance, and restoration activities.

4.2 **Response Operations**

The County's response to a fuel disruption will depend on the cause and severity of the situation. After the County has conducted *Step 1: Analyze Key Topics Related to the Disruption* as articulated in Section 4.1, it can determine if the fuel disruption is **minor** or **major/catastrophic** response. Possible response operations, organized by severity of the disruption and the response actions established in Section 4.1, are summarized in Figure 3 and in the text that follows.

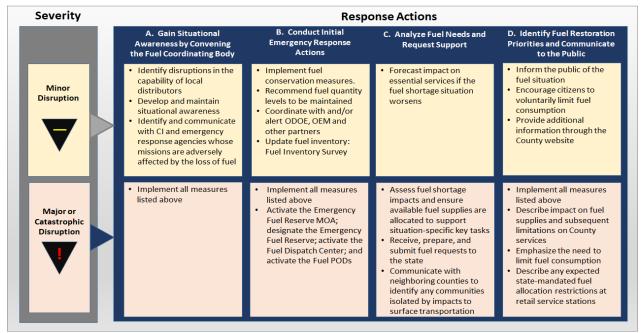


Figure 3. Response Operations During Minor and Major Fuel Disruptions



During a minor fuel supply disruption—defined as a disruption with limited scope that temporarily disrupts the fuel supply, such as a tank farm mishap or temporary difficulties at the refinery or pipeline level—most of the components in the fuel supply chain will be operational and an emergency declaration is unlikely. In this situation, the County will:

- A. Gain Situational Awareness following the steps outlined in Section 4.1.
- B. Conduct Initial Emergency Response Actions:
 - The MCEM Director or EOC Command will request the County Chair/Chief Operating Officer authorize fuel conservation measures

Minor Fuel Supply Disruption

- Localized disruption with limited impact and duration
- Most fuel supply chain components remain operational
- County emergency declaration unlikely

for County Fleet Services and contracted services.

- Suspend non-essential travel,
- Consider the delay of new/optional operations.
- The County EOC will recommend optimum fuel quantity levels be maintained in storage tanks.
- The County EOC will alert emergency response and critical infrastructure partners to the fuel shortage situation and notify them of County actions being taken.
- The County EOC will coordinate actions and messaging with ODOE, the Oregon Office of Emergency Management, and Portland Metropolitan Area partners.
- ESF #12 will update fuel inventory data, noting any operational concerns and issues.
- ESF #12, in collaboration with Unified Command, will consider convening the Fuel Coordinating Body.
- C. Analyze Fuel Needs and Request Support:
 - The Disaster Policy Council will forecast impact on essential services if the fuel shortage situation worsens, and determine Fuel Restoration Priorities and
- D. Communicate the situation to the Public:
 - The EOC Public Information Team will inform the public of the fuel situation.



- Encourage community members to voluntarily limit fuel consumption.
- Provide additional information through the County website.

During a major or catastrophic fuel supply disruption—an extended impact lasting for weeks to months—major components in the fuel supply chain may be damaged or destroyed, possibly halting delivery of fuel to County distributors and consumers, and thus significantly impacting day-to-day public and private-sector operations. In a Cascadia scenario, experts estimate it could take six to eighteen (6-18) months to restore fuel supply chain capabilities. A County emergency declaration will likely be needed, and possibly a Governor's emergency declaration. The County Chair of the Commissioners may declare an emergency and invoke measures needed to effectively manage the incident, to include establishing fuel reserves, allocating available fuel, and delivering available fuel to priority service providers. The Governor may also request federal assistance. In this situation, the County will:

- A. Gain Situational Awareness following the steps outlined in Section 4.1, plus,
 - Conduct Initial Emergency Response Actions:
 - Activate the County Emergency Operations Center (EOC),
 - Assess/review the fuel shortage impact on essential services
 - Recommend essential service fuel priorities based on situation-specific task assignments
 - Recommend fuel management emergency measures to be included in the emergency declaration
 - Coordinate response actions and emergency declaration measures with Fuel Coordinating Body partners, neighboring counties, special districts, and private-sector stakeholders.
 - Evaluate and make recommendations regarding the need for waivers of county, state, and federal regulations governing fuel acquisition, transfer, transport, and use
 - Conduct Initial Emergency Response Actions:
 - Request the County Chief Operating Officer authorize fuel conservation measures for Multnomah County fleet vehicles,
 - Suspend non-essential travel, and
 - Consider the delay of new/optional operations.



- Note: During a State declared emergency the State (via ODOE) will develop a fuel conservation plan under Priority Action 6. County conservation measures cannot be less stringent than those required by the State.
- If possible, keep critical task-related equipment fully fueled and recommend optimum fuel quantity levels be maintained in storage tanks.
- Alert emergency response and critical infrastructure partners regarding the fuel shortage situation and advise them of actions the County is taking.
- Activate the Emergency Fuel Reserve Memorandum of Agreement; designating the Emergency Fuel Reserve; activating the Fuel Dispatch Center; convening the Fuel Coordinating Body, and identifying and activating the Fuel Points of Distribution.
- Update fuel inventory information.
- Coordinate actions and messaging with ODOE, the Oregon Office of Emergency Management, and Portland Metropolitan Area regional partners.
- B. Analyze Fuel Needs and Request Support:
 - Assess fuel shortage impacts and ensure available fuel supplies are allocated to support situation-specific tasks such as:
 - Damage assessments,
 - Debris removal (transportation system clearing),
 - Debris removal (non-transportation system),
 - Transportation system repairs,
 - Fuel transport and distribution,
 - Utility damage assessment and system restoration,
 - Fire suppression,
 - Emergency medical services,
 - Evacuation, sheltering, and mass care,



- Healthcare,
- Emergency communications,
- Commodity distribution, and
- Public safety and security
- Receive local fuel requests; prepare County fuel requests, noting FPOD locations as warranted, and submit them to the state Emergency Coordination Center (ECC) through the County EOC Logistics Section using the ODOE Fuel Request Form.
- Communicate with neighboring counties to determine if any communities have been isolated by surface transportation impacts and may require fuel and other logistics support from Multnomah County.
- C. Identify Fuel Restoration Priorities and Communicate to the Public:
 - Inform the public of the fuel shortage situation and impact on essential services.
 - Describe impact of the incident on fuel supplies and subsequent limitations on County services
 - Emphasize the need to avoid travel/limit fuel consumption.
 - Describe expected state-mandated fuel allocation restrictions at retail service stations
 - Provide a hotline and/or website for additional information.

4.3 Emergency Support Function (ESF #12) – Energy

During a major or catastrophic fuel disruption, the County Chair will direct the County to mobilize the County EOC by activating the Emergency Fuel Reserve Memorandum of Agreement – per guidance by the Disaster Policy Council. The MOA designates the Emergency Fuel Reserve, activates the Fuel Dispatch Center, and activates the Fuel Point(s) of Distribution. The County Chair of Commissioners may use an emergency declaration to specify the types of and quantities of fuel reserves to be established and the rate of compensation for reserve fuel providers.

The Emergency Fuel Management System provides a framework for monitoring, controlling, and allocating available fuel during a major or catastrophic fuel disruption. The objective is to minimize the impact of fuel shortages on critical response services and infrastructure operations. The system is administered



through a public-private partnership of fuel providers and users. Key components of the EOC system include the Fuel Coordinating Body, an Emergency Fuel Reserve, a Fuel Dispatch Center, Fuel Points of Distribution(s), and Fuel Priorities - each will be explained in further detail in subsequent subsections:

4.3.1 Fuel Coordinating Body

The Fuel Coordinating Body is established by the Multnomah County EOC, ESF #12, and is comprised of representatives from local government, major fuel providers, and consumers in Multnomah County, to include:

- ESF #12 Fuel Group Lead (chair)
- Multnomah County fleet services
- Municipal government fleet services
- County fuel contractor representative
- Municipal fuel contractor representative
- Large fuel supply company representatives
- County-wide first responder (law enforcement, fire department, EMS)
- Utility representation (power, water, wastewater, communications)
- Public transit representative
- Business representative
- Health/Medical representative (hospital, urgent care, dialysis)
- Highway/Road representative (County DLUT, city public works)
- Airport representative (Port of Portland)
- Social services representative (County, non-profit)

The Fuel Coordinating Body advises countywide decision-makers on actions the County should take to minimize the impact of a fuel shortage on emergency response and critical infrastructure operations. The MCEM or County EOC Command will convene the Fuel Coordinating Body when conditions warrant.

4.3.2 Emergency Fuel Reserve

The Emergency Fuel Reserve is activated by MCEM or the County EOC Command, working in cooperation with the Fuel Coordinating Body. The Reserve includes the types and quantities of fuel to be controlled and allocated as designated by the County Chair of the Commissioners in their emergency declaration. The emergency declaration will identify the specific type(s) and amount(s) of fuel in the Emergency Fuel Reserve and establish compensation rates.

Fuel will be acquired from providers, and other sources, signatory or listed in the Emergency Fuel Memorandum of Agreement. Fuel will be stored at Fuel Points of Distribution (FPODs) and other locations for allocation to emergency response and



critical infrastructure operations consistent with direction from the Fuel Coordinating Body. A copy of the Emergency Fuel Memorandum Agreement can be found in Tab 8.

4.3.3 Fuel Dispatch Center

When activated, the Fuel Dispatch Center serves as the County's focal point for managing, controlling, monitoring, documenting, and distributing fuel. The Fuel Dispatch Center is operated as a component of the ESF #12 Fuel Group. During a fuel disruption, the Dispatch Center will:

- Inventory fuel levels and provide data to the Fuel Coordinating Body and ESF #12 leadership.
- Recommend additional fuel reserve sites and fuel quantities to the Fuel Coordinating Body.
- Develop the Emergency Fuel Reserve acquisition, storage, and distribution system based on the County's allocation priorities and infrastructure capabilities.
- Coordinate acquisition and delivery of fuel reserves with the County EOC Logistics Section and regularly report the reserve level(s) to ESF #12 leadership.
- Monitor operational status of designated Fuel Points of Distribution and track scheduled deliveries arranged by state and federal officials.
- Document receipt, distribution, consumption, and management of fuel reserves for subsequent billing/cost recovery by reserve fuel providers.

4.3.4 Fuel Points of Distribution (FPOD)

Fuel Points of Distribution are fueling sites designated by the ESF #12 Fuel Group in collaboration with the Fuel Coordinating Body and the Fuel Dispatch Center. FPODs are where emergency fuel supplies are delivered for distribution to emergency response and critical facility agencies and organizations. Fuel delivered to these sites may come from the state in response to a fuel resource request or acquired from local Fuel MOA signatories.

Tab 3 lists Multnomah County's pre-identified FPODs. These are identified based on: geographic distribution, storage capacities and diversity (i.e., gas and diesel), accessibility, security, availability of backup power, and other incident-specific infrastructure factors. When the ESF #12 is activated, the Fuel Group will conduct a rapid assessment of the pre-identified FPODs to determine their structural and operational status. Once viability of the pre-identified FPODs is confirmed, the County will select the specific sites to be used.



The primary FPOD for fuel provided by the state is City of Portland Stanton Yard (N. Stanton & Borthwick Portland, OR 97227). The specific location for fuel delivery ordered from the state must be coordinated with the State ECC ESF #12 or ODOE Duty Officer (503-370-3500) each time a fuel request is approved and a corresponding fuel delivery scheduled.

4.3.5 Fuel Priorities

Fuel priorities during a fuel disruption are determined by the functional capability needed for the situation-specific response tasking or critical infrastructure operations. Fuel priorities include continuity of essential county facilities and services, and may include functional capabilities provided by community partners, such as area hospitals, private-sector businesses, special districts, NGOs, and other organizations.

Fuel Priority Activities				
Damage Assessment	Fuel Transport & Distribution			
Debris Removal	Commodity Distribution			
Public Safety & Security	Fire Suppression			
Transportation System Repair	Emergency Medical Services			
Evacuation, Sheltering/Mass Care	Healthcare			
Emergency Communications				

Multnomah County has pre-identified the following activities as likely to be prioritized emergency response and infrastructure operations:

Table 3. Fuel Priority Activities

The Federal Emergency Management Agency (FEMA) Community Lifeline operations should also be considered during discussions around fuel priorities. Lifelines include:





Figure 4. Fuel Priority FEMA Community Lifelines

The ESF #12 Fuel Group, in collaboration with the Fuel Coordinating Body, will assign current tasks/participants a fuel allocation priority ranking that reflects the relative importance of their tasking to other response tasks. Receipt of a priority ranking enables access to emergency fuel resources in the event that multiple activities receive a priority ranking and there are insufficient quantities of available fuel to allocate to each, the ESF #12 Fuel Group will identify a minimum ranking to receive access. Rankings are based on ESF #12 and Fuel Coordinating Body recommendations and the evolving needs of the incident. Fuel Priority rankings will be revised during each operational period by the Fuel Coordinating Body for review and approval by the EOC Unified Command.

Some groups may be assigned more than one task at different points of the response; in these circumstances, the group will receive a priority ranking for each assigned task.

4.4 **Responsibilities**

	Chair of the County Commissioners
	Declare an emergency and establish the Emergency Fuel Reserve as needed to ensure critical response and infrastructure services can be performed.
	Activating the Emergency Fuel Reserve Memorandum of Agreement, per recommendation by the Disaster Policy Council.



Waive restrictions on the use of County roads as necessary to facilitate the emergency movement of fuel.
Waive County regulations related to fuel movement such as weight limits on county roads.
Specify the types of and quantities of fuel reserves to be established and the rate of compensation for reserve fuel providers
County Disaster Policy Council
Provide policy-level guidance during fuel shortage situations.
County Office of Emergency Management (MCEM)
Activate the County EOC
Initially monitor a fuel disruption or shortage situation
Coordinate emergency fuel issues with regional and state officials.
Activate the Fuel Coordinating Body to assist with fuel decisions.
Alert emergency response and critical infrastructure partners regarding the fuel shortage situation and advise them of actions the County is taking.
Coordinate actions and messaging with ODOE, the Oregon Office of Emergency Management, and regional partners.
County EOC: Unified Command (EOC-UC)
Submit recommended fuel reserve and allocation priorities to the Disaster Policy Group for consideration and approval.
Review, adjust, and approve established emergency fuel allocation tactics.
Activate the ESF #12 Fuel Group in the County EOC.
Communicate with neighboring county EOCs to determine if any communities have been isolated by surface transportation impacts and may require fuel and other logistics support from Multnomah County
County EOC: Emergency Support Function #1 – Transportation
Coordinate Emergency Transportation Route status, guidance, and decision to EOC Leadership and the ESF #12 Fuel Group Lead.



Provide fuel conservation measure guidance for Multnomah County fleet vehicles to the Chair of County Commissioners.
Suspend non-essential travel
Consider delaying initiation of new/optional operations
Update County fuel inventory data, noting any operational concerns and issues (Fuel Inventory Survey form); distribute information to ESF #12.
Manage and staff the Fuel Group under ESF #12.
County EOC: Emergency Support Function #2 – Communications
Collaborate with the ESF #12 Fuel Group to support communications needs between ESF #12 and FPOD sites, internal at FPOD sites, and communication between the State of Oregon ECC and the ESF #12 Fuel Group.
County EOC: Emergency Support Function #3 – Public Works
Coordinate the waiving of restrictions on County roads (e.g., No through truck routes) to facilitate emergency fuel movement when safe to do so.
Consider keeping critical task-related equipment fully fueled.
County EOC: Emergency Support Function #12 – Energy, Lead
Review and approve situation report content conservation measures, service disruptions, fuel availability, rationing guidance, and restoration activities prior to EOC Manager review.
Request resources required to support restoration of the fuel supply and distribution system provided by ESF #12 staff.
Identify staff to interact with any Regional MAC Group discussion regarding fuel.
Share current and anticipated fuel needs to the EOC Manager and Logistics Section Lead.
Forward Regional MAC recommendations regarding government fuel reserve and rationing priorities to the EOC Manager.
Convene the Fuel Coordinating Body, in collaboration with MCEM or Unified Command.
Communicate the County's designated FPOD location to the State ECC (ESF 12 lead) to ensure prompt delivery of fuel resources.



County EOC: Emergency Support Function #12 – Energy, Fuel Group
Conduct rapid assessments of the pre-identified FPODs to determine their structural and operational status upon activation of this plan.
Forecast impact on essential services if the fuel shortage situation worsens.
Recommend optimum fuel quantity levels to be maintained in storage tanks for County operations.
Communicate with neighboring counties to determine if any communities have been isolated by surface transportation impacts and may require fuel and other logistics support from Multnomah County.
Advise the EOC Manager on actions to minimize the impact of a fuel disruption or shortage on emergency response and critical infrastructure operations.
Analyze current fuel supply and demand and request additional fuel through the state, if necessary.
Identify and share resources required to support restoration of the fuel supply and distribution system with the ESF #12 lead.
Revise Fuel Priority rankings during each operational period.
Develop resource requests for submission to the State ECC and send to County EOC Logistics for submission.
Conduct a rapid assessment of the pre-identified FPODs to determine their structural and operational status
Accept incoming resource requests from local partners and assess if local resources can fulfill the request; if not, forward resource request to County EOC Logistics for submission to the State ECC.
Coordinate and implement a system to fuel and maintain generators providing power to critical facilities and those providing essential services.
Monitor the fuel shortage situation as it applies to the County, cities, districts, and other emergency response and critical infrastructure agencies and organizations
Coordinate with neighboring counties to identify portions of those counties that will require fuel and other logistics support from Multnomah County.
Identify current and anticipated fuel needs and submit to the ESF #12 Lead
Identify the need for waivers of county, state, and/or federal fuel management regulations and forward to the EOC Manager for consideration.



	Activate the Fuel Dispatch Center and provide allocation priorities for reserve fuel distribution.
	Work with the Fuel Dispatch Center to identify in-county fuel sources from which to develop and maintain the fuel reserve.
	Coordinate fuel reserve creation (i.e., acquisition), allocation, and delivery with the Fuel Dispatch Center.
	Establish an Emergency Fuel Reserve if fuel shortages jeopardize emergency response and/or critical infrastructure operations.
	Forward Regional MAC recommendations regarding government fuel reserve and rationing priorities to the ESF #12 Lead.
	Identify interdependencies among fuel and other lifelines that may affect restoration priorities.
	Coordinate the sharing and dissemination of priority information regarding fuel supply restoration activities.
	Develop situation reports for the public information officers on conservation measures, service disruptions, fuel availability, rationing guidance, and restoration activities.
	Assign current tasks/participants a fuel allocation priority ranking that reflects the relative importance of their tasking to other response tasks.
	Review current Emergency Transportation Route status and decisions through ESF #1.
Co	ounty EOC: Emergency Support Function #12 – Energy, Fuel Coordinating Body
	Identify the underlying fuel supply disruption cause.
	Identify the impacts of the fuel supply disruption on associated critical infrastructure components (e.g., fuel storage facilities and access points, fuel tanker availability, fuel transportation routes, electrical power grid operations)
	Determine the scope, severity, and anticipated duration of disruption to the fuel supply chain.
	 If activated during a minor fuel supply disruption: Review the fuel shortage situation and project the impact of any increase in fuel supply shortfall. Recommend actions the County should take to minimize the fuel shortage impact on the community.



	 If activated during a major or catastrophic fuel supply disruption: Review projected fuel requirements needed to conduct emergency response and critical infrastructure operations. Assist the County EOC and Fuel Dispatch Center with the identification of additional in-county fuel sources. Compare projected fuel needs with existing in-county fuel inventory and identify any fuel supply shortfall. Recommend the level of Emergency Fuel Reserve to be established by the Board of County Commissioners. Recommend fuel-rationing priorities among tasked emergency response and critical infrastructure functional groups.
	Allocate fuel reserves to priority critical response and infrastructure providers.
	Establish emergency fuel allocation priorities.
	Share road closure information with Fuel Providers
(County EOC: Emergency Support Function #12 – Energy, Fuel Dispatch Center
	Develop the Emergency Fuel Reserve acquisition, storage, and distribution system based on the County's allocation priorities and infrastructure capabilities.
	Coordinate acquisition and delivery of fuel reserves with the County EOC and keep the EOC advised of current reserve level(s).
	Monitor operational status of designated Fuel Points of Distribution and track scheduled deliveries arranged by state and federal officials.
	Document receipt, distribution, consumption, and management of fuel reserves for subsequent billing/cost recovery by reserve fuel providers.
	Identify the level of in-county fuel inventory and provide data to the Fuel Coordinating Body and the County EOC.
	Recommend fuel reserve storage locations and quantities to the Fuel Coordinating Body and County EOC.
	Manage Emergency Fuel Reserve operations as directed by the Fuel Coordinating Body.
	County EOC: Emergency Support Function #14 – Public Information
	Provide information to the public on conservation measures, service disruptions, fuel availability, rationing guidance, and restoration activities.



Describe impact of the incident on fuel supplies and subsequent limitations on County services.
Emphasize the need to avoid travel/limit fuel consumption
Describe expected state-mandated fuel allocation restrictions at retail service stations, if warranted
Provide a hotline and/or website for additional information.
County EOC: Logistics Section
Confirm operational status and designate delivery locations for emergency fuel resupply in coordination with the Fuel Dispatch Center and State ECC.
Receive/collate local fuel requests; prepare state fuel requests and transmit to the State ECC.
Distribute fuel reserves to priority critical response and infrastructure providers.
County Attorneys' Office
Provide legal counsel on fuel management operations
Establish the County's authority to implement mandatory fuel conservation measures
Maintain legal documentation and review all contract language
County Recovery Leadership
Incorporate ESF 12 into demobilization in collaboration with SRF #6 – Infrastructure Systems.
Establish a Local Disaster Recovery Manager (LDRM) to work alongside the State Disaster Recovery Coordinator (SDRC) and the State Recovery Function 6 Coordinating Agency to assess and allocate fuel to support local recovery activities.
Prioritize fuel requests and allocations to support County recovery activities
Terminate fuel allocation activities, when appropriate
Gather costs that have been tracked throughout the event.
ALL County Departments & Participating Community Partners
Manage fuel supply/consumption processes.



Consider suspending non-essential functions, if requested.			
Implement fuel conservation measures.			
Coordinate fuel inventory and resupply with the County EOC.			
State of Oregon			
Identify statewide fuel needs and priorities;			
Seek outside (i.e., EMAC, federal) assistance in obtaining fuel;			
Implement fuel conservation measures;			
Obtain regulatory waivers;			
Allocate fuel to priority users; and			
Communicate with fuel stakeholders and the public			
The Oregon State ECC will notify the Regional MAC Group when it receives competing requests for fuel requests from county EOCs/ECCs within the Portland Metropolitan Area region that exceed the available supply for fuel			

Table 4. Organizational Roles and Responsibility

5. Direction and Control

Through recommendations from the ESF #12 Fuel Group, the County EOC Unified Command will direct and control the County's emergency fuel operations using the Emergency Fuel Management System described in this plan.

When activated, the Fuel Dispatch Center is an operational unit of ESF #12, reporting directly to the ESF #12 Fuel Group Leader and accountable to them for management of the Emergency Fuel Reserve.

6. Recovery Considerations

During the recovery phase, the State of Oregon Recovery Plan will be implemented and State Recovery Functions (SRFs) will replace State-led ESFs. The SRF Coordinating Team #6 – Infrastructure Systems will work with local jurisdictions to allocate fuel to support recovery activities and support the petroleum industry's efforts to ensure timely restoration of fuel supply levels, infrastructure, and delivery of systems back to pre-emergency conditions following a disaster. *See SRF 6 Annex of the State Recovery Plan for more information.* Tasks related to fuel include:

1. Incorporate ESF #12 into demobilization in collaboration with SRF #6 – Infrastructure Systems.



- 2. Establish a Local Disaster Recovery Manager (LDRM) to work alongside the State Disaster Recovery Coordinator (SDRC) and the State Recovery Function 6 Coordinating Agency to assess and allocate fuel to support local recovery activities.
- 3. Prioritize fuel requests and allocations to support County recovery activities.
- 4. Terminate fuel allocation activities, when appropriate.
- 5. Gather costs that have been tracked throughout the event

Transition to Recovery

Following the completion of response and short-term recovery operations (e.g., lifesaving, damage assessment), the State may transition into a State Recovery Organization led by the Governor and supporting coordinating agencies for each of the seven SRFs. A SDRC may be assigned as the main point of contact for local governments and the State may request the identification of a LDRM. The LDRM may be determined based upon the scope of the situation but ideally should not be the same individual tasked with managing the County's ongoing response.

7. Administration and Support

Copies of the current Multnomah County Emergency Fuel Plan will be available on the County website; in the County EOC; in the MCEM offices; and distributed to participating agencies/organizations. Reference Tab 16: Distribution Record for detailed distribution.

Departments, agencies, voluntary organizations, and individuals assigned responsibilities in this plan are responsible for developing implementation procedures and for training personnel to carry out those responsibilities.

8. Development and Maintenance

Multnomah County Office of Emergency Management (MCEM) is responsible for development, coordination, and maintenance of this plan. MCEM, in collaboration with those partners listed, are responsible for reviewing and updating this Plan every five years. Recommended revisions will be sent to the MCEM for review and update in accordance with Multnomah County Emergency Operations Plan (EOP) procedures. Recommended changes should be sent to MCEM Duty Officer (em.dutyofficer@multco.us).

8.1 Training & Exercise Schedule

This Fuel Management Plan requires an active Training and Exercise Program (TEP) that engages key partners with defined responsibilities and approaches plan implementation through a continuous improvement lens. The Fuel Management Plan-related training and exercise program will be developed in coordination with the MCEM Training and Exercise Specialist.



The Fuel Management Plan TEP will include the components listed in Table 4 following any initial development or version update. This TEP will be included in the MCEM Integrated Preparedness Plan (IPP) to influence organizational priorities.

Activity/Event	Purpose	Timeline (Fiscal Year)
Initial Seminar	 Build awareness to Plan Share responsibilities Review Training and Exercise Series Review Maintenance Schedule Collect partner signatories for plan finalization 	Q1 2022
County Tabletop Discussion	 Opportunity for plan to be exercised in a discussion-focused environment Opportunity for plan signatories and partners to engage with responsibilities 	Q2/Q3 2022
Function-Specific Training Content Developed	 Education opportunities for plan signatories and partners Integration into existing EOC structure(s) Determine re-education requirements 	2022
FPOD Workshop Exercise	 Opportunity for FPOD component to be exercised in a discussion-focused environment Opportunity for plan signatories and partners to engage with responsibilities Identify further actions and efforts required 	
Operations-Based FPOD Exercise	• Exercise FPOD operations and staffing in full-scale capacity.	HOLD - NLE
Portland Metro Area Fuel TTX	• Exercise regional fuel management operations with regional partners.	Q3 2022
County Operations-Based Exercise	 Opportunity plan to be exercised operationally Opportunity for plan signators and partners to exercise discussion-based findings Identify focus areas for continuous plan improvement. 	Q1/Q2 2023

Table 4. Fuel Management Plan TEP Timeline



8.2 Plan-Related Training

The training courses listed in Table 5 are a component of the Fuel Management Plan Training and Exercise Program.

Course Title	Duration	Frequency	Course Manager
Fuel Point of Distribution Operations	4 Hours	Annual	ESF #12
ESF #12 Fuel Group Operations	4 Hours	Annual	ESF #12

Table 5. Fuel Management Plan	Related Training
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9. Energy Resilience Considerations

Energy resilience planning, in conjunction with emergency fuel management planning, can help jurisdictions reduce day-to-day energy demand and reliance on fossil fuels, thereby becoming more resilient to hazards and disasters that affect fuel supply, as well as other energy supplies and energy transmission.

Energy resilience planning actions that may be implemented in Multnomah County to complement this Plan may include:

- Consider investments in assets that can be supported by a diversity of fuel resources.
- Increasing the energy efficiency of municipal and private buildings and equipment, especially those that support critical emergency functions;
- Encouraging behaviors that reduce local, public reliance on fuel supply, and other sources of energy to increase community resilience by helping increase the resilience of individuals (e.g. public transportation planning, bike lanes/bikeways, home energy efficiency measures, etc.);
- Selecting equipment compatible with more than one energy option (e.g. dual fuel equipment that allows for fuel switching, or switching between battery and fuel sources);
- Increasing the use of distributed energy resources to reduce to the potential risk of hazards that are likely to impact energy supply and transmission, such as:
 - local generation of renewable energy;
 - local micro grids capable of powering critical facilities;
 - o local energy storage (e.g. batteries); and
 - demand response programs that curtail energy use during times of peak energy demand or scarce energy availability.

Energy resilience planning, like emergency fuel management planning should be a proactive, comprehensive, cross-functional hazard mitigation process. These processes should also consider and inform actions that should be implemented during recovery from disasters. Having Energy Resilience and Emergency FMPs in place will not only



prepare Multnomah County to be most resilient to a disaster that impacts fuel supply and distribution, and most effectively implement response actions; it will also aid in identifying recovery efforts that will increase community resilience.

10. Funding Opportunities

Fuel Storage Facility Compatibility Fund - In 2018, the Oregon OEM released guidance and application forms for the Fuel Storage Facility Compatibility Fund grant program. This program provides grants of up to \$4,000 to public and private card lock facilities for the installation of emergency generator connectors. For more information, visit <u>http://www.oregon.gov/oem/emresources/Grants/Pages/Fuel-Storage.aspx</u>.

Hazard Mitigation Grant Program – The HMGP provides grants to implement long-term hazard mitigation measures after a Major Disaster Declaration and the program allows FEMA to fund up to 75 percent of eligible costs for each project. For more information, visit: <u>https://www.fema.gov/hmgp-faqs</u>

11. References

11.1 U.S. Department of Homeland Security

- *Emergency Support Function #12 Energy Annex*, June 2016
- Analytical Baseline Study for the Cascadia Earthquake and Tsunami, November 2011

11.2 Oregon

- *Cascadia Subduction Zone Catastrophic Earthquake and Tsunami Operations Plan* (Component One), September 2012, Oregon Military Department, Office of Emergency Management.
- *Oregon State Energy Assurance Plan*, Oregon Department of Energy/Oregon Public Utility Commission, August 2012

11.3 Multnomah County & Municipalities

• Multnomah County, Office of Emergency Management. (2017). *Basic Emergency Operations Plan*

11.4 Portland Metropolitan Region

• *Regional Multi-Agency Coordination System Concept of Operations*, Regional Disaster Preparedness Organization, October 2017



12. Tabs

- Tab 1 Multnomah County Fuel Assessment Findings
- Tab 2 Scarce Resource Allocation Process (Oregon)
- Tab 3 Fuel Points of Distribution (FPODs)
- Tab 4 ODOE Fuel Request Form
- Tab 5 Public Information Templates
- Tab 6 Regulatory Waivers
- Tab 7 Fuel Memorandum of Agreement (MOA)
- Tab 8 Fuel Inventory Spreadsheet/Tracker
- Tab 9 Emergency Support Function #12 Organizational Structure
- Tab 10 Emergency Support Function #12 Position-Specific Checklists
- Tab 11 Statewide Point of Contacts
- Tab 12 Definitions
- Tab 13 Fuel Assessment Tool
- Tab 14 Record of Distribution



Tab 1 – Multnomah County Fuel Assessment Findings

To identify fuel-related information Multnomah County will need during a fuel supply disruption, Clackamas, Clark, Columbia, and Multnomah Counties conducted a comprehensive fuel assessment in 2020. Highlights from the assessment, which may critically assist decision-making and response operations during a fuel disruption, are detailed below. For complete Multnomah County fuel assessment results, contact the Multnomah County Office of Emergency Management.

Jurisidiction	Our Jurisdiction's Fuel Stations		Cardlock Sites	Retail Fuel Stations	Mobile Fuel Delivery
Multnomah County	2	S	1	E	E
City of Gresham	N/A	Ν	1	E	2
City of Portland	1	E	N	2	2
City of Troutdale	not reported	not reported	1	not reported	not reported
Wood Village	N/A	1	N	2	N
Sauvie Island Fire District	1	N	N	2	N

Legend: 1 = primary; 2 = secondary; S = sometimes use; E = use in an emergency; N = do not use

Table 6. Multnomah County Jurisdiction Primary Fuel Sources and Stations¹

Jurisdiction	Primary Fuel Source	Primary Fuel Station
Multnomah County	Commercial Cardlock	CFN Cardlock, 521 SW Halsey St, Troutdale, OR 97060
City of Gresham	Commercial Cardlock	Marc Nelson Cardlock, 150 NE Hogan Dr, Gresham, OR 97030
City of Portland	Own Fuel Station	2835 N Kerby Ave, Portland, OR 97227
City of Troutdale	Commercial Cardlock	Pounder Oil Service, 521 SW Halsey St, Troutdale, OR 97060
Wood Village	Reynold's School District	23720 NE Halsey St, Wood Village, OR 97060
Sauvie Island Fire District	Own Fuel Station	11330 NW Saint Helens Rd, Portland, OR 97231

Table 7. Multnomah County Jurisdiction Primary Fuel Stations

¹ City of Portland data includes information on its career fire department. Portland fire and rescue stations use fuel stations owned and operated by the city rather than their own stations.





Figure 5. Multnomah County Jurisdiction Fleets

Jurisdiction	Gasoline Vehicles	Diesel Vehicles	Ethanol Vehicles	Electric Vehicles	CNG Vehicles	Total Fleet Size
Multnomah County	608	82	0	4	0	694
City of Gresham	265	61	0	3	0	329
City of Portland	2,028	972	0	228	13	3,241
City of Troutdale	0	0	0	0	0	0
Wood Village	10	1	0	0	0	11
Sauvie Island Fire District	1	9	0	0	0	10
Grand Total	2,912	1,125	0	235	13	4,285

Table 8. Multnomah County Jurisdiction Average Gasoline and Diesel Usage (gallons/day)

Jurisdiction	Avg. Gasoline Usage (gal/day)	Avg. Diesel Usage (gal/day)
Multnomah County	757	152
City of Gresham	413	177
City of Portland	2,785	2,107
City of Troutdale	115	60
Wood Village	10	1
Sauvie Island Fire District	3	5
Grand Total	4,083	2,503

Table 9. Multnomah County Jurisdiction Purchasing Cooperatives and Fuel Providers



Jurisdiction	Facility Name	Purchasing Cooperative	Fuel Provider
Multnomah County	Yeon Fleet Shops	Oregon Cooperative Procurement Program	Carson Oil Co.
City of Portland	Delta Park	None	World Fuel Services (Associated Petroleum)
	EA Garage (Precinct)	None	World Fuel Services (Associated Petroleum)
	First & Jefferson	None	World Fuel Services (Associated Petroleum)
	Interstate	None	World Fuel Services (Associated Petroleum)
	Kerby (Stanton Yard)	None	World Fuel Services (Associated Petroleum)
	Mt Tabor (Parks)	None	World Fuel Services (Associated Petroleum)
	SE Garage	None	World Fuel Services (Associated Petroleum)
	Wastewater	None	World Fuel Services (Associated Petroleum)
Sauvie Island Fire Distric	t Sauvie Island Fire Station	None	Lawrence Oil

Table 10. Multnomah County Jurisdiction Fuel Providers

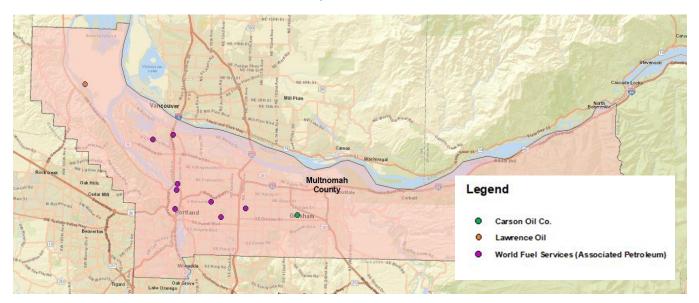


Figure 6. Fuel Offered at Multnomah County Jurisdiction Facilities

Jurisdiction	Facility	Gasoline	Diesel	Biodiesel	Off-road Diesel	Ethanol
Multnomah County	Yeon Fleet Shops	yes	no	yes	no	no
City of Portland	Delta Park	yes	yes	no	no	no
	EA Garage (Precinct)	yes	no	no	no	no
	First & Jefferson	yes	yes	no	no	no
	Interstate	yes	yes	no	no	no
	Kerby (Stanton Yard)	yes	yes	no	no	yes
	Mt Tabor (Parks)	yes	yes	no	no	no
	SE Garage	yes	no	no	no	no
	Wastewater	yes	yes	no	no	no
Sauvie Island Fire District	Sauvie Island Fire Station	no	yes	no	no	no

 Table 11. Multnomah County Jurisdiction Fuel Storage Facilities (gallons)

Emergency Fuel Management Plan



Jurisdiction	Facility	Regular Gas Storage	Diesel Storage	Generators On-Site
	Yeon Fleet Shops	12,000	12,000	0
Multnomah County	B427 Skyline Road Shop	2,000	2,000	1
Multional county	B307 Columbia River Patrol	2,000	0	1
	B432 Springdale Road Shop	2,000	2,000	1
	Delta Park	1,000	1,000	0
	EA Garage (Precinct)	2,000	0	1
	First & Jefferson	20,000	2,000	0
City of Portland	Interstate	5,000	12,000	1
	Kerby (Stanton Yard(8,000	30,000	3
	Mt. Tabor (Parks)	16,000	6,000	0
	SE Garage	10,000	0	1
	Wasterwater	24,000	12,000	0
Sauvie Island Fire District	Fire Station	0	1,000	0
City of Gresham				
Grand Total	98,000	64,000	6	

Table 12. Multnomah County Gas Storage Facilities

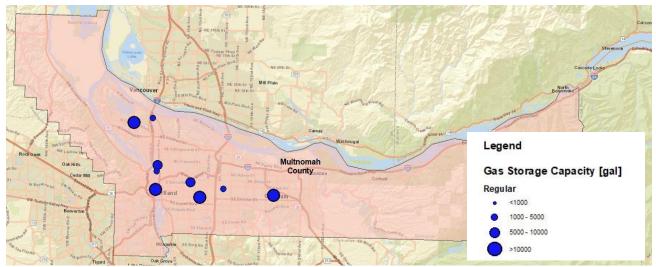


Figure 7. Multnomah County Gas Storage Facilities





Figure 8. Multnomah County Diesel Storage Facilities



Tab 2 – Scarce Resource Allocation Process (Oregon)

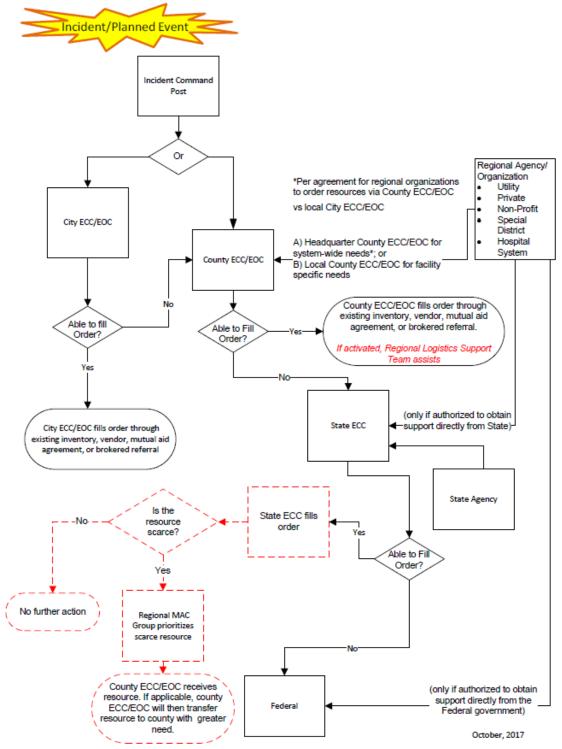


Figure 9. Resource Ordering within a Regional MAC Group Approach



Tab 3 – Fuel Points of Distribution (FPODs)

The County's designated FPOD locations should be communicated to the State ECC (ESF #12) by the Multnomah County ESF 12 Lead to ensure prompt delivery of fuel resources.

Primary: City of Portland Stanton Yard, (2835 N Kerby Ave, Portland, OR 97227)

Secondary: Multnomah County Yeon Complex (1620 SE 190th Ave Portland OR 97233)

- Above Ground Storage Tanks
 - o Tank 1
 - Fuel Type: Unleaded Gas
 - Storage Capacity: 12,000 gallons
 - Average on hand: 5,000 gallons
 - $\circ \quad Tank \ 2$
 - Fuel Type: B5 Diesel
 - Storage Capacity: 12,000 gallons
 - Average on hand: 5,000 gallons

Tertiary: Springdale Road Shop (32620 SE Hurlburt Rd Corbett OR 97019)

Other Possible Options: Columbia River Patrol Offices; Gresham School District



Figure 10. Fuel Points of Distribution Map



Tab 4 – ODOE Fuel Request Form

The ODOE Fuel Request Form must be submitted with any fuel-related resource request to the State of Oregon. The primary method of submission is through OpsCenter (<u>https://oregonem.com/sso/Login.aspx?ReturnUrl=%2fsso%2fhttps://oregonem.com/sso/Loginut.spx?ReturnUrl=%2fsso%2fhttps://ore</u>

This form can be found on the ODOE website: <u>https://www.oregon.gov/energy/safety-resiliency/Documents/New-Fuel-Request-Form.p</u> <u>df</u>.



OREGON EPARTMENT OF ENERGY

Fuel Request Form

All sections must be completed to ensure timely processing of fuel requests

1. DATE/TIME: / AMIPM 2. IDENTIFY PRIORITY USER: Check appropriate box Initial Update ESF Primary State Agency ESF Primary State Agency Initial Update County Emergency Management Agency Requester NAME of ESF PRIMARY STATE AGENCY (include ESF ii), COUNTY, OR TRIBE: A. REQUESTER NAME/TITLE: 5. REQUESTER CONTACT INFORMATION: Email: Work: Mobile: Satellife: Other: 6. REASON FOR FUEL REQUEST: 7. FUEL TYPE AND QUANTITY Inleaded Gasoline Inleaded Gasoline gallons Diesel gallons Aviation Gas gallons Propane gallons Start Date: Time: gallons Start Date: NOTE: Ability to meet fuel requests is determined by event conditions, availability of fuel, access to impacted areas, and state/regional response prionities. NOTE: Ability to meet fuel requests is determined by event conditions, availability of fuel, access to impacted areas, and state/regional response prionities. Notife: Work: Nobile: Work: Nobile: Work:		
Initial Update County Emergency Management Agency Federally-Recognized Tribal Government County Emergency Management Agency Federally-Recognized Tribal Government Account State Security Contact INFORMATION: Email: Work: Kecurity Schedule: County Emergency Management Agency FeoD 1 Name(Type of FPOD (airport, public works, motor pod, cher) Korie: Address: Kecurity Schedule Information (24/7): Name(Type of FPOD (airport, public works, motor pod, cher) Kecurity Kecurity Schedule Information (24/7): Name(Tribe: Address: Kecurity Schedule Information (24/7): Name(Tribe: Address: Kecurity Schedule Information (24/7): Name(Tribe: Address: Kecurity Schedule Information (24/7): Name(Tribe: Mobile: Work: Kecurity Schedule Security Schedule Kecurity Security Schedule Security Security Schedule Security Security Schedule Security Security Schedule Security Security Security Schedule Security Security	1. DATE/TIME:/AM/PM	2. IDENTIFY PRIORITY USER: Check appropriate box
Opdate County Emergency Management Agency Pederally-Recognized Tribal Government 3. NAME OF ESF PRIMARY STATE AGENCY (include ESF #), COUNTY, OR TRIBE: 4. REQUESTER NAME/TITLE: 5. REQUESTER CONTACT INFORMATION: Email: Work: Work: Mobile: Satellite: Other: 6. REASON FOR FUEL REQUEST: 8. FUEL DELIVERY SCHEDULE: 7. FUEL TYPE AND QUANTITY Inleaded Gasoline Inleaded Gasoline gallons Diesel gallons Idet Fuel gallons Propane gallons Other: Gallons Other: gallons NOTE: Ability to meet fuel requests is determined by event conditions, availability of fuel, access to impacted areas, and state/regional response priorities 9. FUEL POINTS OF DISTRIBUTION (FPOD) FPOD 1 Name/Type of FPOD (airport, public works, motor pool, other) PFOD 1 Name/Type of FPOD (airport, public works, motor pool, other) POD 1 Name/Title: Address:		ESF Primary State Agency
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Figure 11. ODE Fuel Request Form

Tab 5 – Public Information Templates

While the mechanism for delivery of public information will be similar regardless of hazard, disruption of the fuel supply may require unique considerations to ensure the public is fully informed. Information that may be developed for dissemination includes:

- The County's fuel supply outlook
- Event impacts to the County's petroleum infrastructure



- The County's actions and decisions in response to the fuel shortage/disruption
- Fuel conservation measures recommended for the public
- Fuel salvage information
- Warnings against price gouging, topping off tanks or hoarding of fuel
- Tips on conserving fuel
- Promote the ODOE emergency fuel outlook website page when internet and wireless access becomes available.

The PIO team should coordinate fuel sector information and messages with the ODOE PIO team and regional PIOs as appropriate to ensure consistent messages are released to the public, news media, and social media outlets.

Key public information resources for emergency fuel management may include:

- ODOE PIO Team resources including boilerplate news releases, fuel conservation tips, news media information packet, and other fuel sector information
- Virtual Operations Support Teams (VOST) support from Oregon Emergency Management (OEM)
- ODOE Telephone Information Center: 1-800-906-9701

TEMPLATE 1: FOR EVENTS "WITH NOTICE"

[Date]

Multnomah County — In anticipation of [enter disaster or anticipated event], Multnomah County strongly advises its residents to fuel up in advance.

Surges in consumer demand due to disasters, emergencies, and other special events can cause disruptions in the fuel distribution system. Early preparation by consumers will help ensure they have the fuel they need, and help make fuel available for responders and other essential workers post-event.

Multnomah County Office of Emergency Management recommends the following:

- Keep at least one vehicle filled with gasoline once the first prediction of a storm or other emergency is received
- Pre-purchase fuels for generators and make sure it is stored properly
- Don't forget propane for your RV

Report Outages/Quality: To report fuel outages or fuel quality issues, residents should contact: [enter whatever mechanism is set up to manage this data during the select disaster. If no such mechanism is yet established at the time of the release of this press statement, consider referring residents to a respected crowd-sourcing or other social media tool, such as GasBuddy.]

Price Gouging: If you believe you have been charged an unconscionably excessive price for fuel, file a complaint with the Attorney General's Consumer Protection Hotline by calling 503-378-8442, emailing pricegouging@oregonconsumer.gov or filing a complaint online at https://oregonconsumer.gov.

TEMPLATE 1: FOR "NO-NOTICE" EVENTS WITH FUEL DISRUPTIONS

[Date]



Multnomah County — Multnomah County is experiencing fuel disruptions due to [enter disaster or event]. Getting our fuel stations back up and running and supplying them with fuel is a top priority of County officials. In the interim, residents are urged to limit their use of fuel and drive their vehicles only when absolutely necessary; exercise calm when waiting on lines at fuel stations; and monitor [enter mechanism established to disseminate emergency information during select disaster] for updates and further instructions.

The following emergency orders have been issued for all residents:

- 1. [Enter any fuel rationing rules in place]
- 2. [Enter any areas of the county closed to the public]
- 3. [Enter any curfews]

Report Outages/Quality: To report fuel outages or fuel quality issues, residents should contact [enter whatever mechanism is set up to manage this data during the select disaster. If no such mechanism is yet established at the time of the release of this press statement, consider referring residents to a respected crowd-sourcing or other social media tool, such as GasBuddy.]

Price Gouging: If you believe you have been charged an unconscionably excessive price for fuel, file a complaint with the Attorney General's Consumer Protection Hotline by calling 503-378-8442, emailing pricegouging@oregonconsumer.gov or filing a complaint online at https://oregonconsumer.gov.

Multnomah County is taking concrete action to restore the fuel supply for our residents: [include all that apply]:

- We have established emergency fuel distribution sites open to the public at the following locations: [list sites]
- We have requested the following waivers to ease rules that restrict free flow of fuel into the County: [list waivers]

Tab 6 - Regulatory Waivers

The oil industry operates under various regulations to ensure safe operations, environmental quality, and fair market competition. These same regulations could also impede the rapid restoration of the petroleum supply and distribution system in the aftermath of an emergency resulting in a long-term or severe fuel shortage. Lifting environmental and safety requirements temporarily after a catastrophic event could ensure timely deliveries of fuel and other disaster relief supplies to impacted communities.



- <u>Biofuel Blending</u>: Oregon requires a minimum amount of biofuels to be blended into all gasoline and/or diesel sold within the state. This requirement could impede the delivery of fuel supplies from states without biofuel blending requirements.
- <u>Clean Fuel Supply</u>: Producers and importers of fossil-based transportation fuels are required to comply with the Oregon Clean Fuel Standards to reduce the overall carbon content of fuel used in Oregon. This requirement could impede the delivery of fuel supplies coming from states with lesser standards.
- <u>Dealer License</u>: Oregon requires a carrier to pay a fee and obtain a Distributor's License to transport motor fuel within the state. Temporarily waiving this fee and license requirement may help speed fuel delivery to the disaster area.
- <u>Diesel Fuel Penalty</u>: The federal government imposes a 24.4 cents-per-gallon tax on diesel fuel sold for on road use. Meanwhile dyed diesel fuel used for farming purposes and home heating are not subject to the tax. If the dyed diesel fuel was used for on road purposes, the federal government would require that use to be reported and the tax paid accordingly. Temporarily waiving this penalty would allow use of available supplies of dyed diesel fuel for emergency use.
- <u>Driver Qualification, Load, and Inspection</u>: Federal and state laws set standards for a driver's physical fitness, level of fatigue, fluency in English, cargo and cargo inspection, and vehicle maintenance and repairs. Temporarily waiving these requirements may be necessary to increase the pool of available drivers.
- <u>Hazmat Specifications</u>: Federal and state laws set strict specifications for the transportation of gasoline including the types of vehicles, shipping papers, and placarding. Temporarily waiving these specifications may be necessary if there is a shortage of available fuel-carrying vehicles.
- <u>Hours of Service</u>: Federal and state laws set standards on how many hours a truck driver can be on duty and drive in a given day and week. Temporarily waiving these standards may be necessary to get needed fuel delivered.
- <u>Importer/Exporter License</u>: State law requires fuel importers and exporters to pay a fee and obtain a license from the state to move fuel across state lines. Without these licenses, the fuel merchant cannot legally buy gasoline from one state and move it to another. Temporarily waiving this fee and license requirement may be necessary to bring fuel from nearby states into the disaster area.
- <u>International Registration/International Fuel Tax Agreement</u>: The International Registration Plan (IRP) is an agreement among states of the U.S. the District of Columbia, and the provinces of Canada providing for payment of commercial motor carrier registration fees. To operate in multiple states or provinces, motor carriers must register in their base jurisdiction (state or province). The International Fuel Tax Agreement (IFTA) is an agreement among states to report fuel taxes by interstate motor carriers. Temporarily waiving this requirement may be necessary to bring fuel from Canada or nearby states into the disaster area.
- <u>Iones Act</u>: The Merchant Marine Act (Jones Act) prohibits foreign-built, foreign-owned, or foreign-flagged vessels from carrying goods and commodities



between U.S. ports. To get adequate fuel supplies into the disaster area without delays, foreign vessels may need to be used to deliver fuel between U.S. ports.

- <u>Oxygenated Fuel Emergency</u>: State law requires the use of oxygenated fuels during winter months in certain designated areas that are not meeting carbon monoxide (CO) ambient air quality standards. Temporarily waiving this requirement may be needed to use fuel in the disaster area that would otherwise not be permitted.
- <u>Reid Vapor Pressure (RVP)</u>: RVP is a common measure of the volatility of gasoline. Many states allow a variance, up to 1 lb. RVP from current standards for gasoline blended with ethanol. This requirement could impede fuel supplies from other states without RVP requirements from entering into the disaster area.
- <u>Ultra-Low Sulfur Diesel</u>: Federal and state law require a cleaner fuel with a maximum 15 parts per million sulfur specification for vehicles and equipment. Temporarily waiving this requirement may be necessary if fuel that doesn't meet these requirements is otherwise available.
- <u>Vapor Recovery and Fuel Transfer, Loading and Storage Waivers</u>: Federal and state law require fuel terminal loading and unloading systems and tank trucks that transport fuels to use specified vapor recovery equipment and comply with other vapor control requirements. Vapor recovery requirements vary from state to state. Some states also establish vapor control requirements for various fuel transfer, loading and storage operations. Temporarily waiving this requirement may be necessary to deliver some fuel into the disaster area.
- <u>Vessel Movement Control</u>: The U.S. Coast Guard has authority to control vessel traffic through the enactment of safety and security zones. Delivery of fuel by water may necessitate implementing such zones.
- <u>Weight Limits and Other Road Restrictions</u>: All states set weight restrictions on the maximum weights allowable for trucks that travel on roadways. In addition, local governments set weight limits and impose other restrictions for vehicles using locally maintained roads. Temporarily modifying these restrictions may be necessary for the emergency delivery of fuel.

Note: Appendix G in the Oregon Fuel Action Plan provides more details about specific fuel waivers and the federal and state agencies responsible for lifting the waivers.

Tab 7 – Fuel Memorandum of Agreement (MOA)





Tab 8 – Fuel Inventory Spreadsheet/Tracker



Tab 9 – Emergency Support Function #12 Organizational Structure

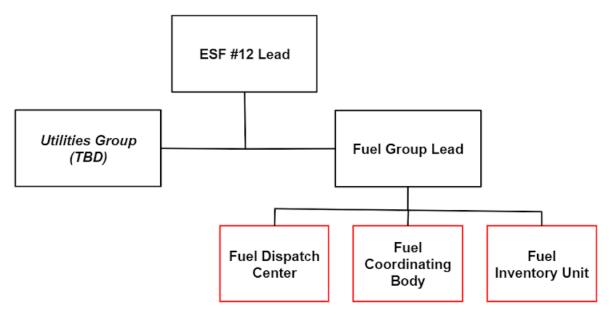


Figure 12. ESF #12 Organizational Structure

Emergency Support Function #12 Lead: This position will report to the Operation Section Lead and direct energy-related operations and information during a County Emergency Operations Center (EOC) response.

Fuel Group Lead: This position will report to the ESF #12 Lead, and direct all Fuel-related operations and information. This position will have the following positions reporting to them:

- <u>Fuel Dispatch Center Team Lead</u>: The Fuel Dispatch Center Lead will direct Fuel Dispatch Center Operations and manage any additional staff necessary to perform that Team.
- <u>Fuel Coordinating Body Team Lead</u>: The Fuel Coordinating Body Lead will manage the Fuel Coordinating Body operations and manage any additional staff necessary to perform that Team.
- <u>Fuel Inventory Team Lead</u>: The Fuel Inventory Team Lead will manage the development and maintenance for fuel inventory and situational awareness, and manage any additional staff necessary to perform that Team.



Tab 10 – Emergency Support Function #12 Position-Specific Checklists



Tab 11 - Statewide Point of Contacts

Organization	Name	Primary Phone	Secondary Phone	Email
ODOE Emergency Preparedness Manager	Deanna Henry	503-932-4428		Deanna.HENRY@energy.oregon.gov
ODOE, Duty Officer	Duty Officer	503-370-3500		Being set up end of 2021
ESF #12, State ECC	ESF #12 Desk	503-373-7792	503-373-7761	No Email
Carson Oil	David Shawen	503-341-7244		dshawen@carsonteam.com
Christensen Inc.	Kevin Steglich	503-803-8470		Kevin.steglich@christensenusa.com
Cardlock – PDX Fleet	Mike Roy	503-823-8345		Michael.roy@portlandoregon.gov
Cardlock – Petrocard	Mindy Thompson	541-593-2216		mthompson@petrocard.com

Table 13. Statewide Fuel Point of Contacts

**Information is updated as of April 2022.



Tab 12 – Definitions

Critical Infrastructure: The assets, systems, and networks that provide essential services to maintain the community's safety, security, health, and economy.

Critical Resources: Resources required for an incident which cannot be obtained within the requested reporting time or which are in scarce supply (e.g., fuel).

Emergency Fuel Management System: A system established by this plan, which provides a framework for monitoring, controlling and allocating that portion of the fuel stored in the county designated as Emergency Fuel Reserve during a major fuel shortage or disruption. The system is administered through a public-private partnership of fuel providers and users to minimize the impact of fuel shortages on critical response services and infrastructure activities. Operation of the system is described in the Concept of Operations.

Emergency Fuel Reserve: The types and quantities of fuel designated by the Fuel Coordinating Body in an emergency declaration to be controlled and allocated under the Emergency Fuel Management System. The declaration will identify the specific type(s) and amount(s) of fuel reserve and establish compensation rates.

Essential Services: Public and private sector functions that provide fundamental safety, health, and welfare services to the public (e.g., electrical power grid operation; law enforcement emergency response; fire and EMS response; medical transport; hospital operations; debris removal; water and wastewater treatment services; food and water distribution).

Fuel: Liquid petroleum products such as gasoline, diesel, jet fuel, and avgas, but not including liquefied natural gas (LNG) or liquefied petroleum gases (e.g., propane, butane, etc.).

Fuel Coordinating Body: A committee comprised of local government representatives and key county fuel suppliers and stakeholders. The Fuel Coordinating Body's role is to advise county decision-makers on actions to minimize the impact of a fuel shortage on critical response and infrastructure activities.

Fuel Dispatch Center: A facility operated by the County's contract fuel provider which is the focal point for creating, monitoring, controlling, tracking, and distributing the Emergency Fuel Reserves. The Center establishes, maintains, and distributes Fuel Reserves based on direction from the Multnomah County Emergency Operations Center (EOC).

Fuel Inventory: The estimated quantity of gasoline and diesel fuel in storage in Multnomah County during an emergency involving a major or catastrophic fuel shortage or disruption.

Fuel Points of Distribution (FPODs): Sites designated by the County where emergency fuel supplies will be delivered based on: countywide needs; route availability; secure access; availability of backup power; and other incident-specific infrastructure factors. Specific locations are coordinated with ODOE each time a Fuel Request is approved and corresponding fuel delivery scheduled. (See Tab 3 for a list of pre-identified FPODs.)

Fuel Request Form: An emergency fuel request form developed by the Oregon Department of Energy (ODOE) that is used by the EOC to request state assistance in acquiring additional



fuel during a major or catastrophic fuel shortage or disruption. County fuel requests are sent to the state ECC for ODOE processing.

Major or Catastrophic Fuel Supply Disruption: A serious or devastating fuel supply disruption resulting in more than a 15% reduction in fuel supply, with significant impact lasting for weeks to many months. Limited fuel supplies combined with other hazard impacts may halt fuel deliveries to the region and County. Emergency fuel management actions by the County will be required to ensure essential response and critical infrastructure operations continue.

Minor Fuel Supply Disruption: A localized fuel supply chain disruption such as tank a farm incident or transport difficulties, with limited duration and impact.

Multi-Agency Coordination (MAC) Group: A group of administrators or executives, or their appointed representatives, from multiple jurisdictions/agencies within the county, who are authorized to commit agency resources/funds and to develop and recommend policy. The MAC Group coordinates decision-making, prioritizes incidents, and allocates critical resources.

Response: Actions taken during and immediately after an incident or event which are intended to reduce injuries and loss of life, stabilize the situation, and protect property and the environment.

Restoration: Short-term actions taken to restore critical systems and essential services to minimum operating levels.



Tab 13 - Fuel Assessment Tool



Tab 14 - Record of Distribution

This Plan has been distributed to the following organizations:

Version	Organization	Digital/Print (D/P)

Table 14. Record of Distribution