

Dear Portland Planning and Sustainability Commission:

Greetings,

I know the hearing on this was yesterday, but I hope my comments may still be considered.

I agree with the points made by David Sweet in the attached letter. To the extent local governments can do so within applicable decision criteria, they should stop taking actions that enable expansion of an unsustainable energy system. Thank you for considering my comments.

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January 10, 2015

TO: Portland Planning and Sustainability Commission

FROM: David Sweet

RE: Zoning Code Amendment for Hazardous Substances in the Environmental Overlay Zone

I have grave concerns about the proposal by Pembina Marine Terminals to build and operate a propane terminal at Port of Portland Terminal 6. While I consider it a bad precedent to loosen the regulations for the Environmental Conservation overlay zone to facilitate a single project, my primary objection regards the amount of greenhouse gases (GHGs) this project would cause to be released into the atmosphere and its concomitant contribution to climate change.

The staff report on the Pembina project acknowledges that energy consumption for the terminal would result in 20,000 metric tons of carbon dioxide (CO₂) emissions per year—a not insignificant addition to Portland's emissions. The propane exported through the terminal would result in an additional 3 to 5 million metric tons of CO₂ annually. However, even this figure vastly understates the impact the facility would have on the climate.

The propane that Pembina proposes to export from Terminal 6 is extracted by means of hydraulic fracturing, or "fracking." As has been shown by Dr. Robert W. Howarth and others, fracking results in the unintentional release of large amounts of methane into the atmosphere (http://www.eeb.cornell.edu/howarth/publications/Howarth_2014_ESE_methane_emissions.pdf). Methane is an extremely potent greenhouse gas, much more

effective than CO₂ at trapping heat in the atmosphere. Dr. Howarth shows that as a result of methane releases, natural gas obtained by fracking has a greater GHG footprint than either oil or coal. And, as the staff report points out, when it is burned propane releases 20% more carbon than natural gas.

Thus, the staff report errs when it reports that, "Globally, a propane terminal can have both positive and negative consequences on greenhouse gas emissions." (See staff report, Part 1, page 29.) Such a terminal cannot have positive consequences on GHGs. Any fossil fuel replaced by the exported propane would have a smaller GHG footprint than the propane itself. Moreover, propane exported through this terminal likely will not replace any fossil fuel, but rather just add to world fossil fuel consumption.

By increasing the availability of propane, the Pembina project would further hamper the necessary global conversion to renewable energy. The staff report points out that the export terminal would reduce the global price of propane and other fossil fuels, and that, "Lower prices tend to lead to higher consumption of these fossil fuels...." (ibid. pg. 29).

Portland has been recognized nationally and internationally for our work to control GHG emissions. Approval of the proposed Zoning Code amendment to make way for a propane export terminal would be a giant step backward. It would negate the important work that our citizens and our government have done to reduce our contribution to climate change. It would shift us from modeling solutions to being just another part of the problem. I urge you to vote "no" on the amendment.