

Hello Portland Planning and Sustainability Commission, Director Anderson, and members of the Portland City Council,

As a resident of Seattle, I will not be able to attend the public comment period provided by the Planning and Sustainability Commission on Tuesday April 7, regarding the Terminal 6 Environmental Overlay Zone Boundary and Code Amendment. I hope you will accept this email as my public comment.

I feel that the zoning change before the Commission would, albeit indirectly, allow a large quantity of carbon pollution into the atmosphere. By contributing to a warmer climate, that pollution would reduce the mountain snow pack which is a significant source Seattle's water supply. I feel that makes me a stakeholder in the Commission's decision.

I am heartened to read in the press that a subcommittee of the Commission has devised a method to price the carbon pollution impact of the proposed Pembina propane terminal. However, it was reported that the 2014 European price used as a baseline was \$6.77. That seems too low. The 'social cost of carbon' used by the EPA is, at minimum, about twice as much.

Additionally, any carbon offset charge should not be fixed to a single point in time, but should increase as the amount of carbon pollution in our atmosphere increases. Again, I refer the Commission to the EPA's 'social cost of carbon', which increases over time.

Also, the Commission should recognize that the European cap and trade system is widely viewed as having oversupplied permits to create market liquidity when the system was started, resulting in depressed prices.

And in the event that the wholesale price of propane is being used to inform the Commission's decision, please recognize that it is undoubtedly lower than it should be, since the general fuel market has not yet internalized the environmental costs of consuming carbon fuels.

Furthermore, the siting of a propane terminal necessarily involves the transport of the propane, whether by ship, rail or pipeline. Given the immense destructive power of large quantities of propane, a comprehensive evaluation should be made of the risks related to transport, particularly to communities along rail lines. This risk has been illustrated all too well by the ongoing catastrophic derailments of crude oil unit trains. Are the transport companies sufficiently insured to cover that level of risk? As you may be aware, Washington Fire Chiefs have asked various railroad companies to verify that they are sufficiently insured when it comes to crude oil transports, and have yet to receive a significant response.

Given these concerns I urge the Commission to deny the proposed zoning change until a more appropriate carbon offset price can be developed.

And I urge the Portland City Council to seek a more comprehensive assessment of risks the proposed propane terminal would bring to Portland and communities along the rail route. And, as with other high-capacity carbon fuel infrastructure projects, the long term climatic impacts should be evaluated and included in any permitting assessment.

Thank you for your consideration of these comments. Below are links related to the sources I've cited.

"City may levy huge fee on propane exporter as carbon offset," Sustainable Life:  
<http://pamplinmediagroup.com/sl/255890-126350-city-may-levy-huge-fee-on-propane-exporter-as-carbon-offset->

Social Cost of Carbon, EPA.gov:  
<http://www.epa.gov/climatechange/EPAactivities/economics/scc.html>

"Fire chiefs demand oil train disaster plans from BNSF Railroad," Seattle PI:  
<http://blog.seattlepi.com/seattlepolitics/2015/03/24/fire-chiefs-demand-oil-train-disaster-plans-from-bnsf-railroad/>

Sincerely,

David Perk  
842 NE 67th St  
Seattle, WA 98115  
David Perk <davidperk@comcast.net>