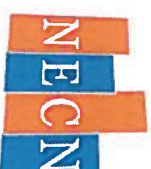


# **Northeast Coalition of Neighborhoods**

**Portland, Oregon**

**Twelve neighborhoods, all of our voices**



Planning & Sustainability Commission  
1900 SW 4<sup>th</sup> Avenue  
Portland, OR 97201-5380  
psc@portlandoregon.gov

RE: Terminal 6 Environmental Overlay Zone Boundary and Code Amendment

*(via postal and electronic mail)*

Dear Planning & Sustainability Commission Members:

I write on behalf of the Northeast Coalition of Neighbors ("NECN") to express our concerns about the proposed Terminal 6 Environmental Overlay Zone Boundary and Code Amendment ("Amendment") which would enable Pembina Pipeline Corporation to construct at propane export facility in Portland. The NECN appreciates the hard work by City staff and the Planning and Sustainability Commission ("PSC") has done in considering this proposed zoning code amendment and the broader discussion it has sparked. We hope the PSC takes all of the community testimony into consideration before making a decision as this process will likely be the only substantive opportunity for public review of this project.

The NECN is composed of 12 neighborhoods in North and Northeast Portland, representing over 60,000 Portland residents. NECN staff and volunteer board members are dedicated to improving the safety, livability, and desirability in our service area. NECN has taken keen interest in this Amendment decision as our member neighborhoods are located within just a few miles of the proposed facility it would enable, and the propane will likely be transported via the Kenton rail line that passes through two of our neighborhoods.

With safety reports and analyses, namely the Quantitative Risk Assessment ("QRA") and the Coast Guard marine safety analysis, either all too recently completed and released to the public or still in process, we believe it would be unfair to the community for the PSC to make a decision, apart from denial, that takes into account the public perspective. Without proper consideration for the recently released or omitted reports the PSC cannot consider key aspects when weighing the pros and cons of this decision. The NECN Board opposes the proposed Amendment given the fact that information that the City has made available to review at this time is incomplete.

Pembina's final draft of their QRA was only just released on 4/2/15 giving the public, the Commission, and City staff exactly 2 full business days to digest a 250 page technical document. This is an extremely important document whose findings need adequate time for public review, especially since the first draft that was presented at the last public meeting in March had some significant omissions. The final draft QRA still glaringly omits any consideration or study of the

safety hazards to our community of moving propane to the facility via rail lines that travel through our neighborhoods. Pembina insists they do not have control of the propane while it is in transit by the railroads, but we insist that this issue be considered more by the City and PSC as the potential impacts of an accident during transport through our neighborhoods would be felt first and foremost by our community.

Apart from key documents being provided to the public with a very short window for review, there is a safety study germane to public health and well being that currently in process. The Coast Guard is reviewing safety and access impacts regarding the marine side of the project on the Columbia River and will release their findings this summer. As safety and accessibility are huge concerns of the community and NECN specifically, we feel these analyses need to be considered as the PSC makes a decision.

Alone, the multitude of safety concerns for the facility warrants a meticulous and thorough review of all sides of the project before a decision that would allow a facility such as Pembina's is made but when coupled with the global climate implications associated with such a facility, the decision becomes much clearer from the perspective of NECN. Local and global emissions pose a real and significant danger to the health and safety of our residents, and this facility would be a huge source of CO2 emissions to our community. Local and global emissions pose a real and significant danger to the health and safety of our residents and this facility would be a huge source of CO2 emissions to our community. The local transportation and refrigeration-related emissions alone from this project would be equal to 0.7% of the emissions of the entire City of Portland, greater than the emissions from 8,000 additional homes. However, the emissions from the combustion of the fuel transmitted annually through this facility would be equal to a 0.01% increase in global emissions, equivalent to 760,000 additional cars on the road. That's likely greater than the entire number of cars on the road within Portland on any given day! Approval of the Amendment and development of this facility not only increases the risk to our community, but it directly contradicts the intentions of the landmark Climate Action Plan the City and PSC helped to draft earlier this year.

In closing, with such significant safety, economic, public access, and environmental impacts for our community, the PSC should not make a decision to approve the Amendment with the current information available. Please understand that there is no urgency besides self-imposed deadlines in deciding this matter. NECN urges you to take the time to make a prudent and informed decision while weighing all of the impacts and concerns of the community.

Sincerely,

A handwritten signature in blue ink that reads "Alan Silver".

Alan Silver  
Board Chair  
Northeast Coalitions of Neighborhoods