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Supplemental Testimony to the Planning & Sustainability Commission, City of Portland *The Proposed Pembina Propane Export Terminal at the Port of Portland*

Ted Gleichman, April 7, 2015

Sierra Club continues to strongly oppose this project. This is a photograph of the Chiba LPG plant on Tokyo Bay, some 500 kilometers (more than 300 miles) from the epicenter of the March 11, 2011, Tohoku earthquake. (See the full-grown decorative trees at the bottom for scale.)



The quake ruptured the plant; six people died and dozens were injured. It took eleven days for the propane to burn itself out and for collateral fires to be extinguished. This happened in the industrial economy that is globally best prepared for seismic catastrophe.

Our own level of seismic preparedness and engineering capability barely compares to Japan, and the First Responder capacity in the Pacific Northwest to deal with our guaranteed Cascadia subduction earthquake is wholly inadequate. Despite the Pembina consultants' speculative evaluation, it is clear that the City cannot be assured under any circumstances that a seismically-induced propane unit train fire, which would burn for days, would not create a 23-million gallon BLEVE (Boiling Liquid Expanding Vapor Explosion).

We believe that you have enough information now to reject this project. However, for any member of the Commission who does not agree with that contention, we further contend that you do not have enough information to approve this project. Design is nowhere close to complete, and so cannot be independently reviewed. Other required permits and approvals have not been received. And no truly independent evaluation of risk has even been attempted yet.

In addition to these major deficiencies, it would be improper for you to vote to approve today, if there is any prospect that you may, without a full evaluation by the City staff of all information you have received to date.

I raised this issue verbally on January 13, in the post-hearing discussion. There is a clear and irrational contradiction to permitting public testimony and input on one of the most complex and risky projects in Portland history, and yet potentially making a decision with full evaluation and review of the testimony and comments that you yourselves solicited.

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This issue is a logical and a legal fallacy. If you are not prepared to reject this project today, you must delay your formal consideration for referral to the City Council until the staff evaluation of all testimony submitted through today has been completed, and then published for public review.

Thank you for your work on behalf of our city, and for your consideration.