



Why Jordan Cove LNG Terminal Should Be Rejected

By Ed Averill

Climate Impact

Note that there have been recent court decisions to the effect that FERC doesn't get to ignore climate impact. [See Court vs. Ferc on Energy vs. Climate](#)

A good writeup on Jordan Cove is the Oil Change International report. A full copy of that report is [available at this link](#).

A main point of the report was to provide "full life-cycle" evaluation of climate impact. Here are some highlights:

The proposed Pacific Connector Gas Pipeline and Jordan Cove Energy Project would transport and process into liquefied natural gas (LNG) around 430 billion cubic feet of fossil gas annually. The greenhouse gas (GHG) emissions triggered by the project will be significant, but to date the scope of these emissions has not been well understood.

Table 1: Lifecycle GHG Emissions from Jordan Cove LNG and Pacific Connector Pipeline

Lifecycle Stage	Reference Case (MMT/Y)	High Case (MMT/Y)
Gas Production	10.9	26.0
Gas Processing	0.51	0.52
Pipeline Transport to Jordan Cove	0.78	0.78
Gas Liquefaction	1.8	1.8
Tanker Transport	0.44	0.44
LNG Gasification	0.40	0.40
Foreign Transmission & Storage	1.3	1.3
Foreign Distribution	0.43	0.43
Combustion	20.2	20.2
Total	36.8*	52.0*

*Figures may not add due to rounding.
Source: Oil Change International - See Appendix for details.

This says that depending on who's information on gas production leakage rates, the climate footprint for the operation on an annual basis would be between 36.8 million metric tons CO₂e and 52 million metric tons CO₂e. My information suggests even the 52 MMT is likely to be lower than reality. None the less, when we consider that Oregon's total footprint being captured by Clean Energy Jobs is about 63 MMT, it seems obviously evil to take responsibility for allowing a commitment to 52 MMT for a project duration of way past when we want our state carbon footprint for carbon fuels to be near zero.



Statements of Opposition

Statements of opposition include Senator Jeff Merkley and Bill McCaffree a Republican who was President of the IBEW in the Coos Bay area are attached as PDFs.

Oregon Environmental Impacts:

The following comes from: <http://www.rogueclimate.org/oregoncanstoplng>

The State of Oregon can stop Jordan Cove LNG & the Pacific Connector pipeline. Here's how.



posted by ALLIE ROSENBLUTH | 950sc April 09, 2018

Oregon's Governor Kate Brown recently told CSPAN that the Jordan Cove LNG export terminal and the Pacific Connector fracked gas pipeline proposed in southern Oregon was just a “federal decision.” However, **Governor Brown and the state of Oregon do have the authority to stop this project for good**, despite what the Federal Energy Regulatory Commission (FERC) may do under Trump.

In fact, Oregon has denied an LNG terminal once before, despite FERC granting an approval.

For over a decade, communities in southern Oregon have stood up against the proposed fracked gas export project and pipeline. This project, now proposed by a huge Canadian fossil fuel corporation called Pembina, would threaten about 400 waterways (including 12 public drinking water sources);



disturb tribal territories and burial grounds; trample the rights of landowners through the use of eminent domain; put existing jobs in fishing, tourism, and other sectors at risk; drive up energy prices; and become Oregon's largest source of climate pollution by 2020.

Although FERC denied this project twice in 2016, the company submitted a nearly identical application in 2017, expecting the pro-fossil fuel Trump Administration in D.C. to quickly give this project a green light. In just one year since the application was submitted, thousands of community members, tribes, impacted landowners, businesses, and environmental groups have voiced their concerns about this project by [protesting at the company's open houses](#) in March 2017, [filing as intervenors](#) with FERC this fall, and kicking off 2018 by [going to Salem to ask Governor Kate Brown and other state leaders to stand up](#) for the climate and jobs in clean energy by putting a stop to this proposal.

Governor Kate Brown and the State of Oregon have broad, powerful authority to deny the Pacific Connector fracked gas pipeline and the Jordan Cove LNG export terminal.

Here are three of the ways the State of Oregon and Governor Brown can stop the project:

1) State Lands Authorizations: The State Land Board is responsible for the management of lands under state ownership and oversees the [Department of State Lands \(DSL\)](#). They have the authority to reject authorizations for the use of state-owned and managed lands. As chair of the State Land Board, the Governor plays a key role in approving or denying stand lands easements that Pembina needs to build the Pacific Connector fracked gas pipeline and the Jordan Cove LNG export terminal.

In 2007, the State Land Commission of California used its authority to deny the Cabrillo Port LNG facility and even cited concerns about climate pollution in its decision. Oregon's State Land Board could do the same to stop Jordan Cove LNG and the Pacific Connector pipeline.

DSL also reviews removal and fill activities in Oregon's waters. The agency can listen to the public's concerns and deny permits where they conflict with



the “paramount public interest” of protecting the state’s waterways for navigation, fishing, and public recreation. The State Land Board can support the DSL in taking this action. For example, in 2014, the State of Oregon denied removal-fill permits for the Coyote Island coal export terminal near Boardman, Oregon - a clear demonstration that Oregon can deny polluting, dangerous projects.

TAKE ACTION: The State Lands Board meets on the second Tuesday in February, June and October each year. Additional meetings are scheduled as needed in April, August, and December. **The next State Land Board meeting is in Salem on Tuesday, April 10. If you can’t make it to Salem or missed the meeting, you can email comments to State Land Board members, Governor Kate Brown, Secretary of State Dennis Richardson, and Treasurer Tobias Read.**

2) Clean Water Act Certification: Oregon’s [Department of Environmental Quality \(DEQ\)](#) is responsible for deciding whether the massive fracked gas pipeline and export terminal would negatively impact the water quality in Oregon. DEQ does this by denying or issuing a certification for the project under Section 401 of the Clean Water Act. The Energy Policy Act of 2005 expressly reserves the authority of states to review pipelines and LNG terminals under the Clean Water Act.

In other words, FERC cannot approve Jordan Cove LNG or the Pacific Connector fracked gas pipeline if the Oregon DEQ decides that the project does not comply with Oregon’s water quality standards. There is no way that a project proposing to cut through hundreds of waterways and dredge millions of cubic yards of protected salmon habitat to ship fracked gas overseas complies with Oregon’s rules protecting fish, aquatic habitat, and clean water.

DEQ is currently being funded by Pembina to review their project. Governor Brown can commit the necessary resources to the agency so that it is not dependent on the funding it receives from Pembina to perform this analysis. She can also assure DEQ that its decision and any discretion it may exercise in applying the standard will be vigorously defended by Oregon’s attorney general’s office.



New York, Maryland, Washington, and Oregon have stopped fracked gas projects by denying the required 401 certifications. In 2011, Oregon’s DEQ denied a Clean Water Act permit for the Bradwood Landing LNG terminal on the Columbia River because the proposed dredging “would result in a significant lowering of water quality.” By comparison, the Jordan Cove LNG export terminal and Pacific Connector fracked gas pipeline would require far more dredging and would impact twice as many waterways and wetlands as the Bradwood LNG proposal.

Oregon has already shown that LNG terminals aren’t just a “federal decision” by denying Bradwood LNG, a proposal that FERC approved during the Bush Administration.

TAKE ACTION: DEQ will open a public comment period once Jordan Cove and Pacific Connector submit the final materials needed for their Clean Water Act application. This could be in a few weeks or a few months, but when the comment period opens we will all need to submit comments to help DEQ deny this critical permit. We need to demand that DEQ does all it can to protect Oregon’s waters from this fracked gas pipeline and LNG export terminal. **Make the pledge to submit comments here and when the comment period opens, Rogue Climate will send you materials to help you write your comments and information about comment writing workshops across Oregon, northern California, and virtually.**

3) Coastal Zone Management Act Certification: Oregon must decide whether or not the LNG terminal, pipeline, and associated tankers are consistent with the [Oregon’s Coastal Zone Management Program \(OCMP\)](#). The OCMP requires that all coastal development is in compliance with local land use regulations, statewide planning goals, and all state permit authorities. Like the Clean Water Act, FERC cannot preempt Oregon’s authority under the Coastal Zone Management Act. Oregon can stop the proposal by determining that it is inconsistent with the OCMP.

In 2008, the State of New York used the authority of the Coastal Zone Management Act to deny a fracked gas project. Governor Patterson rejected Broadwater, a 1,200-foot-long floating fracked gas terminal proposed in the Long Island Sound, stating that the project was not consistent with New



York's coastal zone management policy and that the region could find other, more responsible ways to ensure sufficient energy supplies.

TAKE ACTION: Since approval of the Jordan Cove LNG export terminal and Pacific Connector pipeline also requires local permits in Coos and Douglas counties to ensure consistency with Coastal Zone Management Act, many organizations are currently challenging the local jurisdictions' approvals of the project based upon unreasonable or expanded interpretations of their coastal management criteria. These efforts will continue over the next many months. Communities will also be looking to Governor Brown to ensure that this project complies with Oregon's Coastal Zone Management Plan. **Commit to support these actions and to show up at relevant county and state land use proceedings to demand that the decision-makers exercise their full discretion to protect local landowners, salmon-bearing rivers, and rugged coastal forests. [Sign up to get updates on this and other pipeline news here.](#)**

In addition to using its own authority, Oregon has to be ready to stand up to Trump's FERC. In the past, FERC has repeatedly overstepped state authority by approving LNG terminals and related pipelines without the state first making its decisions under the Clean Water Act, Coastal Zone Management Act, and other state-issued permits. [Oregon challenged FERC's approach](#) before, arguing to the 9th Circuit Court of Appeals in 2008 that FERC improperly approved the Bradwood LNG terminal before the Department of Environmental Quality decided whether or not to grant the 401 Clean Water Act certification. Oregon also argued that FERC did an inadequate environmental review, ignoring the state's concerns about environmental and safety impacts. Oregon must stand ready to challenge FERC again.

In summary, Oregon has stopped LNG terminals in the past and can do it again.

Governor Brown can stand up against this project and the Trump Administration's fossil fuel agenda. Governor Brown and Oregon's agencies can stop Pembina Pipeline Corporation from risking so much of why we're proud to call Oregon our home. We know that corporate special interest

groups and the fossil fuel industry will do all that they can to get the Jordan Cove LNG export terminal and the Pacific Connector fracked gas pipeline approved, so it will take all of us to hold our state accountable for protecting our communities from this dangerous project.

Sign up to volunteer to stop the Jordan Cove LNG export terminal and Pacific Connector fracked gas pipeline [here!](#)



All sorts of information about its devastation of waterways from the dredging of the port, to the hundreds of river crossings were pointed out. The deforestation for the pipeline as Wade Mosby lived through for the Ruby Connector pipeline. That deforestation also produces a chemically enforced permanent clearcut up to the both edges of every river crossing the pipeline makes. The storage/transfer facility is guaranteed to go up in flames when "The Big One" earthquake and tsunami hit the region. And the pipelines throughout the state area also guaranteed to release their contents to masses of fires.

FACTS AT A GLANCE

Total Annual GHG Emissions:	36.8 million metric tons
Pipeline Project Name:	Pacific Connector Gas Pipeline
LNG Export Terminal Project Name:	Jordan Cove Energy Project
Ownership:	Pembina Pipeline Corporation
Operator:	TBD
Pipeline Length:	229 miles
Pipeline Diameter:	36 inches
Pipeline Capacity:	1.2 billion cubic feet per day (cf/d)
LNG Export Capacity:	7.8 million metric tons of gas per year (MMT/Y)
Project Cost:	\$10 billion
Land Affected:	5,146 acres
States Directly Affected:	Oregon
Counties Affected:	Coos, Douglas, Jackson, and Klamath
Gas Source:	The Rocky Mountain states of Utah, Wyoming, and Colorado and the Montney Basin in British Columbia
Claimed Destination Markets:	Primarily Asia - Japan and China
Intended Permit and Project Schedule (Est.):	Final Environmental Impact Statement (August 2018); FERC order granting authorization and state permits (November 2018); Construction (first half of 2019); In-service date (first half of 2024)

But, as I pointed out, the really evil part of the project is that it is intended to cause a major new amount of extraction it proposes to create. That, of course, will poison millions of gallons of clean water, millions of cubic feet of soil, etc. **But it has a climate impact.**

What is the burden on the planet from Canadian investment in Jordan Cove LNG? Upstream Releases	39 Mmt CO ₂ e/yr
Plant Operation	2 Mmt CO ₂ e/yr
Downstream Combustion	21 Mmt CO ₂ e/yr
Total :	62 Mmt CO₂e/yr

Depending on upstream leakage rate assumptions, the Upstream CO₂e release number can **vary from 39Mmt to over 100Mmt**. I believe a leakage rate of 4% is reasonable, so **my estimate** of total CO₂e is **62 Mmt/yr** even though I have not included downstream leakage -- which does exist, too. This compares to the **63.4 Mmt CO₂e** from the 2015 Global Warming Commission's table in the 2017 report. In other words, the Jordan Cove project will contribute about as much to global warming as the



State of Oregon, plus or minus, and they have no intention to, and categorically deny the need to, cooperate with the controlled shutdown of carbon fuels that is necessary to protect the planet.

Table 1: Oregon Emissions by Sector, 1990-2015 (Million MT CO₂e)

	1990	1995	2000	2005	2010	2011	2012	2013	2014	2015
Transportation	21.0	22.6	24.4	24.7	23.2	22.3	22.3	21.3	21.4	23.2
Residential & Commercial	16.6	19.9	23.1	22.0	23.3	22.5	20.8	22.0	21.4	22.2
Industrial	13.9	16.9	18.0	13.7	12.3	12.2	11.5	11.9	12.4	12.8
Agriculture	4.9	5.5	5.3	5.7	5.2	5.5	5.5	5.2	5.2	5.2
Total	56.4	64.9	70.7	66.2	63.9	62.4	60.2	60.3	60.3	63.4

So, to me, **Jordan Cove is plain inexcusable on a climate change basis**, and all the other reasons we can come up with for failing to permit it are great mechanisms for preventing a horrendous mistake.
