Monday, July 24, 2017

To: Metro Council President and Councilors via email
Tom Hughes <tom.hughes@oregonmetro.gov>
Shirley Craddick <shirley.craddick@oregonmetro.gov>
Carlotta Collette <carlotta.collette@oregonmetro.gov>
Craig Dirksen <craig.dirksen@oregonmetro.gov>
Kathryn Harrington <kathryn.harrington@oregonmetro.gov>
Sam Chase <sam.chase@oregonmetro.gov>
Bob Stacey <bob.stacey@oregonmetro.gov>

cc:
Metro Council Office <metrocouncil@oregonmetro.gov>
Ken Ray <ken.ray@oregonmetro.gov>

Dear Metro Council President Hughes and Councilors Craddick, Collette, Dirksen, Harrington, Chase, and Stacey,

We, the undersigned, request that you vote to proceed no further on your proposal to begin sending one-fifth (200,000 tons) of our tri-county area’s waste to the Covanta Marion waste-to-energy (WTE) incinerator in Brooks when contracts expire at the end of 2019. Both Metro and Covanta have said that such an increase will require doubling the capacity of the waste-to-energy plant.

Such a doubling of capacity would expand and perpetuate an outmoded, dirty, high-carbon technology at exactly the time we need to do everything possible to rapidly transition to a low carbon society based upon health, equity, and clean forms of energy and low levels of extraction, waste, pollution, and global warming emissions.

Metro is promoting WTE incineration, in part, because it produces electricity. But this is electricity created using an outdated and expensive technology dependent upon having a continuous stream of high-carbon fuels such as plastics to burn. This form of dirty energy slows and undermines the transition to clean renewable energy technologies such as solar and wind, and also undermines the jobs and opportunities created by such a transition.

Bold leadership is required to protect the health, environment, and climate of present and future generations, and to resist the regressive actions currently being implemented at the federal level that threaten our air, land, water, and health.
It’s exactly this type of bold leadership that Metro Council President Tom Hughes, Portland Mayor Ted Wheeler, Multnomah County Commission Chair Deborah Kafoury, Beaverton Mayor Denny Dole, and Milwaukie Mayor Mark Gamba recently exhibited in signing the "We Are Still In" letter to the international community. The letter affirms that, despite the actions of our President, they and many other "mayors, governors, college and university leaders, businesses, and investors are joining forces for the first time to declare that we will continue to support climate action to meet the Paris Agreement."

Bold leadership is also exemplified by the City of Portland and Multnomah County’s unanimous adoption on June 1st, 2017 of resolutions committing to a goal of 100% renewable electricity by no later than 2035, and transitioning all sectors, including transportation, heating, and industry, to 100% renewable energy by 2050. Incineration of municipal and medical waste is explicitly excluded from the definition of renewable energy in both resolutions.

The U.S. Conference of Mayors demonstrated similar bold leadership on June 26th when more than 250 mayors unanimously committed their communities to the goal of 100% renewable energy by 2035. Like the Portland and Multnomah County resolutions, the resolution specifically excludes the "incineration of municipal and medical waste" from the definition of renewable energy.

Metro’s WTE incineration proposal flies in the face of all the above actions, and it’s also totally inconsistent with the vision and objectives embodied in the climate action, fossil fuels, and sustainability policies of cities and counties throughout Metro’s region, e.g. Portland and Multnomah County’s jointly adopted 2015 Climate Action Plan, the separately adopted fossil fuels divestment policies of Portland, Multnomah County, and Metro, etc.

While there are many reasons for Metro to reject its WTE proposal, we underscore these particularly significant reasons:

• Based upon U.S. Environmental Protection Agency data, WTE incinerators produce more pollution and global warming emissions per unit of electricity produced than coal-fired power plants.

• While the entire community will be impacted by the additional pollution and global warming emissions that Metro’s proposal would create, communities that already face socioeconomic and health inequities, which include youth, elders, people of color, and low-income communities, will be most severely impacted.

• Average emissions of nitrogen oxides (NOx) -- an EPA criteria pollutant -- from Covanta Marion were 13-14% below the DEQ permit limit in 2011 through 2015, but only 4% below the more stringent and lower federal limit.
High levels of NOx impair respiratory and circulatory health; contribute to smog, acid rain, global warming, and water quality deterioration; and travel considerable distances.

- Environmental Justice must be considered because low-income communities and communities of color are likely to bear disproportionate risk from exposure to emissions produced from burning waste, including carcinogenic dioxin, heavy metals and particle pollution. Communities like Keizer, Brooks, Woodburn and Salem include environmental justice communities with high numbers of Latinx residents. Disposal of toxic ash waste can also threaten communities.

- Oregon’s solid waste hierarchy prioritizes energy recovery over disposal. According to DEQ, however, such prioritization applies only "so long as the energy recovery facility preserves the quality of air, water and land resources." Because WTE plants produce even more pollution and global warming emissions than coal plants per unit of electricity produced, and because Covanta Marion’s high NOx emissions seriously impair air, land, and water resources, the stipulation justifying prioritization -- and one of the rationales for Metro's proposal -- is clearly not met.

- One of the assumptions underlying Metro’s proposal was the expectation that sending 200,000 tons of waste to the Covanta WTE incinerator would produce lower greenhouse gas (GHG) emissions than sending it to a landfill. The July 5 Health Impact Assessment (HIA) on Metro’s proposal, however, offers no support for the assumption. The HIA found instead that two widely used models of WTE and landfill GHG emissions "generated conflicting answers to the question of which waste management scenario would result in fewer GHG emissions" and thus "no definitive recommendation on which scenario would have the lesser impact on climate change" can be made.

For these and other reasons, we strongly urge you to cease further work on this dangerous and dirty proposal.

Additionally, we encourage Metro to double down on development of green jobs to address our waste management rather than investing in outdated solutions whose deleterious impacts have been borne disproportionately by communities of color. We should focus instead on promoting high road wage and benefit standards for the existing workforce in the solid waste recovery system, connecting with efforts elsewhere in the nation to promote good paying jobs for this predominantly people of color workforce.
Thank you for considering our request,

Sincerely,

Kelly Campbell
Executive Director
Oregon PSR

Jo Ann Hardesty
President
NAACP Portland

Mary Peveto
President
Neighbors for Clean Air

Additional signers:

Ramon Ramirez, President, PCUN

Tony DeFalco, Deputy Director, Verde

Khanh Pham, Programs and Strategy Manager, APANO

Adriana Voss-Andreae, Executive Director, 350PDX

Lisa Arkin, Executive Director, Beyond Toxics

Lenny Dee, Founder, Onward Oregon

Katharine Salzmann, Member, Eastside Portland Air Coalition

Nancy Pfeiler, Linda Wallmark, Laurie Dougherty, Co-coordinators, 350 Salem

Bonnie McKinlay, Climate Action Coalition

Rhett Lawrence, Conservation Director, Oregon Chapter, Sierra Club

Courtney Rae, Community Organizer, BARK

Stacey Schroeder, Founder, North Portland Air Quality (NPAQ)