

Millennium Bulk Terminals Proposal
Site ID [#22237](#)

EIS Scoping Comments

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Introduction

Thank you for the opportunity to provide Scoping Comments for this proposal.

I am here today because I understand that there is some question about the proper physical scope for assessing impacts from this proposal. Some feel it should be localized, limited to the boundaries of the terminal itself. Others feel that it should also include the impacts on the communities near the coal mines and all along the railroads that will be used for transporting the coal. Still others feel that the global impact must be taken into account.

I am here because I don't see any real difference in these three points of view. Here in the Northwest, we are already seeing that the global IS the local, and vice versa. We are already feeling the local impacts of global changes. To say there are three options is truly to make a distinction without a difference. And an EIS that ignores any of these impacts must be deemed inadequate and must be challenged in court.

We need a comprehensive, programmatic Environmental Impact Statement that includes climate change impacts.

It is no defense to say that these impacts cannot be measured. By that reasoning, we cannot measure the climate change impacts of ANY project. Thus NO project has

measurable impacts. And thus we don't have a climate change problem, which we clearly do. Ways must be found to include climate change impacts in any environmental impact analysis or it must be challenged in court.

In an effort to highlight this in the EIS, I would like to ask that the items below be included in the scoping.

Definitions

- As a prelude, let me say that in my comments, when I say "impacts," I mean the quantified, physical and economic differences between the No Action Alternative and the proposed project.

- When I say "emissions" or "additional emissions" I mean all emissions related to the extraction, processing, transport by land and sea, and burning of the coal proposed to pass through this facility in the proposed project. These emissions include, but should not be limited to:
 - Carbon dioxide;
 - Carbon monoxide;
 - Mercury, including methylmercury generated by microbial action on mercury molecules released into aquatic ecosystems;
 - Lead;
 - Sulfur;
 - Sulfur dioxide;
 - NO_x compounds;
 - Uranium and its decay products;
 - Thorium and its decay products;
 - Potassium-40 and its decay products;

It is worth noting that these elements and compounds have been identified arriving in our region from China and other locations across the Pacific

Ocean, and have had quantifiable epidemiological impacts on human (especially pregnant women and their fetus'), animal, and plant health.

- When I say “incremental impacts” I mean the additional impact of these emissions on top of the impacts that science is now telling us are unavoidable due to our burning of fossil fuels for the last two-hundred years and our inability to curb our emissions over the last two decades.
- When I say “collective incremental impacts” I mean the sum of all impacts from the various mechanisms and paths by which the additional emissions manifest their damage in the region. Some of these are, for example, higher temperatures, altered precipitation patterns, the arrival of new pests due to a more accommodating climate, altered snow melt timing, etc. All these mechanisms impose a collective impact on forests, growers, fishermen, and wildlife.

Comments

Comment 1 – Please determine the collective incremental impact on the Pacific Northwest shellfish industry as the additional emissions acidify and warm the waters of Puget Sound, Hood Canal, and the North Pacific in general.

Comment 2 – Please determine the collective incremental impact on salmon populations as average temperatures rise in breeding streams, as snowpacks melt earlier in the season, as ocean acidification alters the ecosystem, and as other climate changes descend upon our region due to these emissions.

Comment 3 – Please determine the collective incremental impacts on Eastern Washington forests as weather patterns change, as pest populations grow, as habitat temperatures rise, and as precipitation levels change due to these emissions.

Comment 4 – Please determine the collective incremental impacts on the region’s fruit-growing industry as temperatures rise, precipitation patterns change, pest populations grow, and new pests arrive in our region due to changes in our climate driven by these emissions.

Comment 5 – Please determine the collective incremental impacts on our wine industry, which is one of Washington State’s largest industries, as precipitation patterns change, temperatures rise, and new pests and vine diseases arrive in our region due to climate changes driven by these emissions.

Comment 6 – Please determine the collective incremental impact on human (especially pregnant women and their fetus’), animal, and plant health due to these emissions.

Comment 7 – Please determine the collective incremental impact of these emissions on our coastal communities as sea level rises and more intense storms erode the bluffs and beaches that heretofore separated them from the sea. Please determine the collective cost of any required buyouts, relocations, and/or protective measures that may be required on our coasts.

Thank you.