

Form Letter R:

The scoping decision should require the EIS to focus on actual impacts, and only analyze those that can be discerned and evaluated using credible analyses. For instance, the emission of carbon dioxide into the atmosphere is not an impact. The impacts would be if altered weather patterns and sea level rise if they resulted from the accumulation of carbon dioxide, and other GHGs, in the atmosphere over the course of long time periods. However, the degree of emissions required to cause those impacts is vastly greater than the emissions that can be attributed to this project, even if you incorrectly assume that exported coal will result in incremental new emissions, rather than simply displacing coal that is already available from other sources. Climate change impacts, such as ocean acidification and temperature increases, cannot be attributed to this project because there will be no discernible climate change effect from this project. Emissions from use of the coal exported across this terminal, even if assumed to be incrementally new emissions, are simply too small in comparison to the emissions over long time periods required to change the global climate in measurable ways.