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Subject: Comments for scoping process
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Call upon the White House Council on Environmental Quality to direct the U.S. Army Corps of Engineers (USACE) to develop a comprehensive EIS at the USACE Northwestern Division level, on the cumulative effects of all six currently proposed coal export proposals, and any future proposals, together, including analysis of the cumulative impacts of the proposals throughout the entire region and internationally, including their direct and indirect impacts on tribal cultural resources

Coal kills — The mining, transport and burning of coal impacts human health, plants and animals, changes global ocean chemistry, and contributes to the world's increasingly extreme weather events and changing climate.

2. Coal has no place in the Pacific Northwest — Oregon and Washington plan to shut down their remaining coal-fired plants; the region is a leader in sustainable development and should not be used as a conduit for dirty coal.

3. Coal companies and their partners have been bad neighbors — The main players in the Northwest export expansions have a demonstrated legacy of pollution, broken environmental laws, and ruthless business practices. For Peabody, Arch Coal and the rest, their bottom line — not good citizenship — is the most important thing.

4. Coal is dirty — Humans were burning coal when horse and carriage transport was commonplace and whale oil was still in widespread use. Many cleaner energy options have been developed and continue to come online in the U.S. and around the world. The future of the world energy economy lies in renewables, not dirty fossil fuels.

5. Coal will harm economic development — Negative impacts on salmon and other species will hurt our fishing economy, and as the Public Financial Management report showed in Bellingham, coal exports would box out other industries like tourism

Tribal Effects

It is hard to list all the impacts these proposals will have on Indian ways. The impacts on treaty rights are paramount. But tribes are also concerned about impacts to cultural resources and traditional cultural properties, access to tribal fishing grounds, increased barge and rail traffic that will impact subsistence fishermen disproportionately, and increased mercury contamination in salmon, which constitute a much higher percentage of Native diets than among non-Natives. While salmon are critical, shellfish and the subsistence gathering of wild foods are also threatened by the cumulative effects of more coal mining, transport and burning.

Shellfish, filters of the estuaries and coasts, will have to contend with even more toxics and particulates that may suffocate or poison them.

Diesel emissions and coal dust from mile-and-a half long rail cars would reduce air quality and deposit toxic elements such as mercury into waterways;

- Port construction and a huge scaling up of barge traffic would harm crucial fish habitat;

- Burning more coal in Asia would drive global warming, ocean acidification, mercury deposition, and other crises that affect species like salmon and steelhead that help power the economies of Washington and Oregon.

Burning coal is one of the world's biggest sources of carbon pollution. Carbon dioxide is a heat-trapping gas when it lodges in our atmosphere. Once there, it warms the planet in much the way wearing a down parka on a warm day will make you overheat. Carbon dioxide buildup is one of the major contributors to higher global temperatures, melting ice caps, and rising seas that researchers have documented all over the globe, and contributes to the strange weather patterns that have escalated in the last century. Our oceans are also absorbing carbon dioxide, which is turning them more acidic and stressing marine life. We can substantially reduce carbon emissions using existing, affordable technologies, but sending American coal to China is simply outsourcing our pollution, and climate change and toxic emissions don't respect international boundaries.

Increased toxic deposition from coal burning and wind-driven transport — Burning coal, whether in Centralia or Beijing, releases not just greenhouse gases but also poisonous substances like mercury and arsenic. Toxic chemicals from Asian power plants rise on the winds and carry back across the Pacific Ocean to land on the Pacific Northwest: studies have placed nearly one-fifth of the mercury in the Willamette River, and 14% of the mercury on Mt. Bachelor in central Oregon, as originating from Asia.

Increased ocean acidity from coal burning ocean acidification directly affects the ability of mollusks, corals, pteropods, and other organisms to develop their shells and skeletons. In fact, the rate at which reef-building corals produce their skeletons, the ability of marine algae and zooplankton to maintain protective shells, and the survival of larval marine species are reduced. These small creatures are an important food source for salmon and other fish, which are in turn food for orcas, bears, and humans. Coal burning therefore affects not just the tiny creatures that salmon eat, but the entire marine food web we all depend upon.

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*Success is not the result of
spontaneous combustion.
You must set yourself on fire
Reggie Leach*