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Submission Text

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Lee Metzgar, 703B Skyla Court, Missoula, Montana. I took a look at the climate change and greenhouse gases portion of the EIS and have the following to enter into the record.

If the coal that will be transported on Tongue River Railroad is burned, it will contribute over two billion metric tons of carbon dioxide equivalence to the atmosphere. The inclusive climate change-related costs of emitting that much CO2 are estimated by United State agencies as between 11 and 144 billion dollars, and even the high estimate may be too low. The dEIS, as we've heard, assumes that selling Tongue River coal from the Otter Creek and other induced mines will simply displaced other fossil fuels and result in little net contribution to the global carbon dioxide emissions.

In fact, 23 years from now, after the life of this project, the Tongue River coal either will have been burned or it will not have been burned. If it has been burned, then billions and perhaps hundreds of billions of dollars of harm will have been done. Whether ignoring these costs, all build alternatives should recognize them for what they are. And the no-action alternative should identify their prevention as a benefit.

It's clear that corporate and public gains from this project simply do not rise to a level of enormous harm that this project will cause. In the shorter term, to the extent that the Tongue River coal will displace more costly alternative fossils fuels, keeping that coal in the ground would encourage continued conversion to cleaner power generation from natural gas and renewable energy.

Because net gains in Montana jobs and wealth had been shown to accompany the conversion from fossil fuels to renewable energy sources, the no-action alternative will result in additional benefits that are not recognized in the draft Environment Impact Statement. These benefits should be included in the final EIS analysis.

There is now consensus among scientists that approximately 75% of known reserves of fossil fuels must remain in the ground if we're to have a chance of a healthy climate. It's time to stop the under insanity of developing new sources of fossil fuels when we know that most of them must remain in the ground.

The Tongue River coal should be at the top of our list of fossil fuel reserves that cannot be developed. It is a dirty fuel that emits subsequently high amounts of greenhouse gases and it will contribute little to our national interest. The enormous benefits of leaving this coal in the ground overwhelm any economic gain from its extraction, sale, and use.

The only way to safely sequester carbon and fossil fuels is to leave it in the ground, and the only clean coal remains unmined. The Surface Transportation Board will serve Montana and the nation best by selecting the no action alternative.