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Organization: Montana Chapter of the Sierra Club

State: Montana

Agency: Surface Transportation Board

Initiative: Tongue River Railroad

Submission Text

Please see attached letter.

Montana Chapter



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September 20, 2015

Dear Surface Transportation Board Members,

The over 2000 Montanans who are members and supporters of the Montana Chapter of the Sierra Club urge the Surface Transportation Board to choose the No-Action Alternative for the proposed Tongue River Railroad. The likely harms that would be caused by all of the other alternatives far outweigh any potential benefits. Only the No-Action Alternative protects the clean and healthy environment so highly valued by our members and guaranteed by the Montana Constitution.

Only the No-Action Alternative protects the beautiful alluvial valley of the Tongue River and Otter Creek from future coal mining that the railroad would make possible and from the harms connected with the daily operation of the railroad. Only the No-Action Alternative protects the productive ranches and the ranch families who have lived along the Tongue River and Otter Creek for generations, and relied on its waters, from having their land, water and livelihoods destroyed by open-pit coal mining and the daily actions of the railroad. Only the No-Action Alternative protects the richly diverse ecosystems that are the alluvial valleys of the Tongue River and Otter Creek: riparian areas home to birds, mammals, reptiles, amphibians, fish, insects, and diverse plant species.

Only the No-Action Alternative protects down-track communities throughout Montana, Idaho, Washington, and Oregon from the disruptions and pollution of an estimated 26 additional trains each way per week hauling 20 million tons of coal annually through the hearts of many communities. These trains could be over 100 cars long and take many minutes to travel through the grade crossings in these communities. The diesel-electric engines that pull these trains would be highly polluting, with visible, sooty exhaust streaming from the engines into air of the communities. Diesel engines commonly run for many hours, both day and night as trains are stopped in switchyards, especially during winter, when inversions are the worst. Also, the documented decrease in the load-weight of the cars from when they are loaded in Montana to when they are offloaded at Pacific coast ports prove that coal particles are leaving the cars as they travel on the railroad, bringing their mercury and other heavy metals and toxins to the communities that they pass through. How many additional cases of lung diseases would be initiated and exacerbated if the Tongue River Railroad were built? How many emergency vehicles, ambulances and fire trucks, would be seriously delayed by the many additional long trains that the Tongue River Railroad would cause to pass through dozens of communities? How many homes and businesses would burn and how many people would be seriously harmed or die due to the delays of these emergency vehicles? And if the mined coal that the Tongue River Railroad would make possible would be transported by train to the east, these same harms would impact the dozens of communities the long trains would pass through heading to the Midwest and East.

Finally, only the No-Action Alternative would keep from being released into the atmosphere the huge quantities of carbon dioxide that would come from burning the estimated 20 million tons of coal per year that the Tongue River Railroad would enable to be placed into the environment each year. Approximately 7,000 pounds of carbon dioxide are produced from each ton of coal burned. This means that if the Tongue River Railroad is built, approximately

1,400,000,000,000 pounds of CO₂ would enter the atmosphere each year just from the coal being burned. An additional very large amount of CO₂ would also be put into the atmosphere due to the manufacture of the heavy equipment used to mine the coal, the fuel burned in the operation of this heavy equipment, and the fuel burned by transporting this coal to where it is burned in power plants, including trains, trucks, and the highly polluting fuel burned by the massive ships that would transport the coal from U.S. Pacific Coast ports to Asia, and then the fuel burned in transporting the coal from Asian ports to power plants potentially thousands of miles from the ports.

March 2015 was the first month ever recorded that CO₂ levels in the atmosphere were above 400 parts per million for the entire month. According to NASA's Erika Podest, "CO₂ concentrations haven't been this high in millions of years." Though our atmosphere is already overloaded with unprecedented levels of carbon dioxide, the additional carbon dioxide that would be put into Earth's atmosphere due to the Tongue River Railroad being built would be a large cause of enduring harm. Some of the carbon dioxide that would be put into the atmosphere if the Tongue River Railroad were built would remain there, absorbing atmospheric heat, for thousands of years. The natural processes that would remove this carbon dioxide from the carbon cycle are very slow. Returning this carbon dioxide to the earth or to the sea floor—and therefore taking it out of the carbon cycle—takes centuries.

As reported by Climate Central, whose staff and board members are among the world's most respected climate scientists, such as Princeton's Michael Oppenheimer and Stephen Pacala and Stanford's Sally Benson:

NOAA and NASA jointly released their global temperature data, indicating that this year [2014] topped both 2005 and 2010 as the hottest since record keeping began in 1880. The global temperature was 1.24°F above the long-term average, besting the previous record holders by 0.07°F.

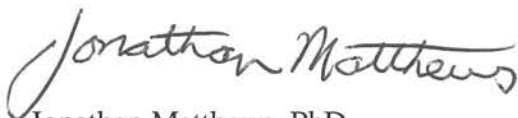
The global ocean temperature was also the highest on record, coming in at 1.09°F degrees above average while many land areas were also warmer than normal or set records such as many countries in Europe and the western U.S.

With 2014 in the record books, this means that 13 of the 15 hottest years on record have all occurred since 2000. Also, this marks the 38th consecutive year with global temperatures above average. In comparison, the last time we set a global record cold temperature for the year was way back in 1911.

(<http://www.climatecentral.org/gallery/graphics/10-warmest-years-globally>)
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The evidence is clear. Our Earth's atmosphere cannot bear, without great harm, the massive quantities of carbon dioxide that building the Tongue River Railroad would enable to be put into it. If the decision on whether or not to build the Tongue River Railroad is based on a rational analysis of the facts, the Surface Transportation Board will choose the No-Action Alternative. The coal deposits beneath the alluvial valleys of Otter Creek and the Tongue River need to stay where they are. The railroad needs to not be built.

Thank you for your careful deliberation on this serious matter,



Jonathan Matthews, PhD
Energy Committee Chair
Montana Chapter of the Sierra Club