

June 5, 2015

Ken Blodgett
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423
ATTN: Office of Environmental Analysis
Docket No. 30186

Dear Mr. Blodgett,

The Surface Transportation Board must analyze cumulative environmental effects of the Tongue River Railroad, and, to its credit, recognized in the draft Environmental Impact Statement (EIS) that “greenhouse gas emissions have a uniform impact on global warming regardless of where emissions occur.” The Board was on the right track, so to speak, because it recognized that coal transported to China has the same adverse effect on our climate as the coal burned in my home state, Montana.

But the Board concluded the Tongue River Railroad, together with its twin, the Arch Coal Company’s new Otter Creek coal mine, “would [have] negligible positive impact to a miner adverse impact” on greenhouse gas emission. Apparently, such convoluted language is meant to suggest that the Tongue River Railroad and the Otter Creek coalmine will not increase carbon emissions, which strains credibility.

How can you build a new railroad to a new mine, the largest in Montana, one of the largest in the world, and not increase global carbon emissions? The Board bases this reprehensible conclusion on its economic analysis. The Otter Creek coal will displace the coal being mined at other Powder River Basin mines.

This renders your Environmental Impact Statement a suspicious document. University of Montana economist Tom Power, when he looked at the same market data, concluded that Tongue River Railroad will send coal from Otter Creek to China. This is not a “negligible positive” or “a miner adverse impact.” The railroad and the mine will not displace other coal going to market. It will add 2.5 billion tons of new carbon dioxide into our atmosphere, the “uniform impact on global warming regardless of where emissions occur” your EIS points out.

Recommendation 1: The Board’s conclusion on the economics of the railroad and its benign affects on global warming contradicts a well-respected, Montana-based economist who studied the same data and arrived at a startlingly different conclusion. The Board must reevaluate its economic model in light of Dr. Power’s work. In addition, the Board needs to include an alternative that analyzes the cumulative environmental impacts of Otter Creek coal export to Asia. Until it does so, it should choose the No Action Alternative and KEEP THE COAL IN THE GROUND.

Please note that the Intergovernmental Panel on Climate Change (IPCC) won a Nobel Prize for its work on climate change. The IPCC's latest report warns that, if your agency permits the Tongue River Railroad, whose sole purpose is to facilitate at the Otter Creek coalmine, we will trigger "abrupt or irreversible" tipping points. Global warming tipping points keep all of us concerned about our children and grandchildren up at night, and it astonishes me that the Board has completely ignore them.

Ignoring a new "carbon bomb" at a time when all the data is clear this will lead to disaster for our children and grandchildren is an immoral act.

The fact is, the United States must transition into a new carbon-free electrical power economy as rapidly as possible. We have the technology, the money, and the workers to build a no-carbon alternative to these incredibly destructive new railroads, new coalmines, and Asia's coal-fired power stations.

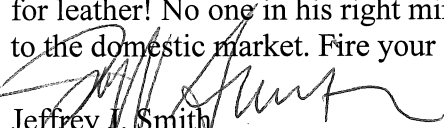
Recommendation 2: The Board needs to examine an alternative that fully describes a massive, Rosie-the-Riveter World War II-style transition from fossil fuel generators to wind, water, and solar energy. Until it does so, it should choose the No Action Alternative and KEEP THE COAL IN THE GROUND.

Which brings me to my last point.

For the sake of argument, let's assume your economic analysis is correct, that the Tongue River Railroad will open up the Otter Creek coal mine, and this new source of 1.5 billion tons of coal will *displace* other Powder River Basin (PRB) coal and be sold to coal plants within the eastern United States or even at Colstrip, the Montana generator close by the mine. The Board's EIS says for every ton of Otter Creek coal sold on the market, between .76 and .88 tons of other PRB coal in an existing mine will not be mined. You are doing the bidding of the vehemently anti-union Arch Coal Company. What your EIS is basically saying is that existing union miners will lose their jobs at these other mines when Arch Coal builds the non-union Otter Creek Mine.

Recommendation 3: A federal agency has no business busting unions. The Board should rewrite the EIS to include analysis of the effects of the railroad on our existing workforce. Until it does so, the Board should choose the No Action Alternative and LEAVE THE COAL IN THE GROUND.

This EIS is a very similar "bait-and-switch" that Arch Coal did with the Montana Land Board a few years ago. You are pretending there is a domestic market for the coal, and, once the railroad and the coalmine are permitted, Arch Coal will export the coal hell bent for leather! No one in his right mind thinks billions of tons of new Montana coal will go to the domestic market. Fire your EIS contractor and start over.


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