

Received: 6/6/2015 12:48:09 PM

Commenter: Christopher Preston

Organization: self

State: Montana

Agency: Surface Transportation Board

Initiative: Tongue River Railroad

Submission Text

I write to request that the Surface Transportation Board pursue a “no action” alternative on the Tongue River Railroad. Please do not build it. I am a professor of ethics at a university in Montana. The justice issues in this proposal weigh heavily against the railroad being built. The mine, the railroad, and the export terminals for the project are all owned – either wholly or partly – by one company, a company whose share price has declined by over 90% in the last 7 years. The benefits of this project are inevitably directed towards the employees, directors, and shareholders of this one struggling company. The costs are distributed widely across the landowners whose land would be condemned, the communities across the Northwest through which these coal trains would travel, the port cities who would export the coal, the Northwestern populations who would be recipients of the airborne mercury from burning the coal in Asia, and the whole global population who would suffer the effects of climate change. There are an unconscionable amount of losers in this project for only very few winners. This is a grave injustice. Coal plants in the US are on the way out. This is a fact of economics and of environmental burdens. The US economy will benefit much more from a transition to new types of fuel than from digging deeper on a 19 century technology of burning black rocks dug up from the ground. The alleged export markets towards which this coal is targeted are themselves being weaned from coal. China’s demand for coal is destined to go down after 2019. US coal use is shrinking dramatically as part of the domestic energy portfolio. This is quite simply an investment in disappearing technology, not an investment in the future. Again, the beneficiaries are a select few. Those who bear the burdens are many. According to the draft EIS, depending on the alternative chosen, the greenhouse gas impacts could be as much as 81 MMTCO₂e or as little as a small reduction in emissions. (The reduction in emissions scenario is extremely unlikely. “The one scenario where emissions are reduced is the northern alternative with low coal production and zero export scenarios” (5.2.4.4). Is this really a credible scenario?). The method for impact analysis of coal combustion in Chapter 5 of the DEIS (5.2.2.1) is bizarre and outdated. It simply assumes that without Tongue River Coal, other coal will fill the gap (viz. 5.2.4.2 Comparison with Competing Coal). This involves the background assumption that coal will continue to be burned whatever people are doing to bring it to market (or not). And yet it seems clear that simply guaranteeing a continued supply of coal is what is required to support this assumption. The supply issue is the very part of the argument that needs to be questioned. We have clearly seen in the US domestic market in the last 5 years that coal DOES NOT continue to be burned if the price increases relative to other fuels and if the public interest turns against it. This comparative analysis begs the most important question it should be investigating. It is a self-supporting analysis that makes assumptions in exactly the wrong places. The assumptions support a continuation of the status quo which is exactly what millions of people (including the 192 nations that will meet in Paris in December of this year for the UNFCCC COP 19 meeting) are working hard to supersede. The twisted logic on display is surely evident to the report’s authors in the claim offered in one of the conclusions (5.2.4.5) about the no-action alternative. The claim is that not building the railroad and not burning the coal could INCREASE greenhouse gas emissions. Can you really write that in a report and not suspect that there is something fishy in the assumptions being made? Missoulians don’t want their small town industrialized by increased rail traffic, diesel pollution, noise, dust, delays at crossings, and accidents. Do not build!