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Submission Text

See attached comments.

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In the Matter of Surface Transportation Board Docket 30186
June 18, 2015

I encourage the Surface Transportation Board to find the Tongue River Railroad Draft EIS to be deficient and unreliable evidence upon which a permit for the Tongue River Railroad could be considered. In other situations, I may try to persuade the Board that it could cure defects through trade-offs and additions/deletions. However, this convoluted EIS indirectly advocating for the uniquely harmful incremental combustion of coal begs for an uncompromising decision.

I'm tired of buck-passing in the matter of global warming, the devastating effects of which have barely commenced as humans fearlessly and foolishly add to our atmosphere large CO₂ quantities above the tipping point of 400 ppm, a point that was surpassed in the year 2014. About 1/3 of CO₂ comes from burning coal, even though far less damaging, cost-effective alternatives are available. Why were these not compellingly addressed in the EIS?

By way of analogy, two thousand years ago the Romans insidiously relied on lead in many forms, a practice that significantly led to early death, impotence and the demise of their empire. The United States EPA web-site states: "The Romans were aware that lead could cause serious health problems, even madness and death. However, they were so fond of its diverse uses that they minimized the hazards it posed. Romans of yesteryear, like Americans of today, equated limited exposure to lead with limited risk. What they did not realize was that their everyday low-level exposure to the metal rendered them vulnerable to chronic lead poisoning, even while it spared them the full horrors of acute lead poisoning." The result, according to many scholars, was a weakening of the world's greatest superpower of that day and age, which significantly contributed to its remarkable downfall.

So how does history judge this pea-brained miscue by the Romans and their governing bodies? And by extension, what if Roman lead-based technology and preferences had been deployed worldwide? A resemblance to the issue of global warming is difficult to ignore.

In considering the final sentence of the EPA quote regarding ignorance, what if a Roman governing body similar to the Surface Transportation Board had discovered that low-level exposure to lead would hasten the death of their society and empire, but the Board wantonly permitted a big new lead mine regardless of the fatal consequences? How would history judge that governing Board?

What if the Board had reasoned that such matters were beyond its purview, and that some other governmental entity would act, perhaps, to stop the madness? The nexus between these historical ponderings and the unbuilt Tongue River Railroad, its associated unbuilt mine, unburned coal and unformed CO₂, leads to an overarching question to each Board member: To which planet would you suggest this matter be punted if you decide your collective authority is so narrow that you can't reject this deficient, unreliable EIS for its failure convincingly to address incremental global climate change?

Please vote for the No Action alternative in the EIS, and NO to the ill-conceived Tongue River Railroad, should its consideration arise under your jurisdiction. These well-justified actions of yours would symbolically and very literally demonstrate levelheaded, intelligent American leadership in this most critical of issues confronting humankind.