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Organization:

State: Montana

Agency: Surface Transportation Board

Initiative: Tongue River Railroad

Submission Text

I am vehemently opposed to the construction of the Tongue River Railroad due to threats to private property and from climate change and increased coal train traffic, and believe the draft EIS formulated regarding this project and these issues is wildly inaccurate in almost every way: Eminent domain • Montana farmers and ranchers face federal condemnation of their private property if the Tongue River Railroad is permitted. • The railroad is speculative, since there is no market for Otter Creek coal. • If the TRR is built, Arch Coal would export Otter Creek coal to Asia. This means the government would give Arch Coal the power to seize land from Montana landowners to support Asian economies. Coal train traffic • The draft EIS claims that the TRR could transport up to 18 to 26 unit coal trains per day, and at the same time concludes that the TRR will not lead to any increase in coal train traffic. • The draft EIS claims that coal dust has no negative effect on human health and that coal dust is not a byproduct of shipping coal. • Because STB claims there won't be any additional train traffic, the draft EIS claims no additional toxic diesel exhaust from the 18 to 26 trains a day. Climate change • Similar to STB's treatment of coal train traffic in the draft EIS, the document claims that transporting Otter Creek coal to market will have no impact on greenhouse gas emissions. Coal markets • Coal has dropped from 50% to 35% of domestic electricity consumption in less than a decade and many coal plants are closing or transitioning to other fuels. There is no U.S. demand for Otter Creek coal. • While the draft EIS claims strong demand for Otter Creek coal, it also claims that Otter Creek coal will have no impact on demand. This is clearly false logic based on flawed assumptions.