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Submission Text

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My name Jeff Smith. I'm the co-chair of 350 Missoula. I live at 105 Channel Drive in Missoula. The Surface Transportation Board misanalysed the cumulative environmental effects. To its credit, it recognized in the EIS that "greenhouse gas emissions have a uniform impact on global warming, regardless of where emissions occur." The Board was right on track, railroad track, so to speak. Because it recognize that the Otter Creek coal transported to China has the exact same adverse effect on our climate as the coal burned close to home, at Colstrip, say.

But the Board concluded that the Tongue River Railroad, together with its twin, the Otter Creek coal mine, "would have negligible positive impact to a miner adverse impact on greenhouse gas emission." I think that language means it wouldn't increase carbon emissions.

How can you build a new railroad and a new mine, the largest in Montana, and not increase global carbon? Easy. 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 is a magic formula. They say there will be no increase in coal production. In my mind, this renders the entire Environment Impact Statement a suspicious document. UN economist Tom Power, when he looked at the same market data, concluded that the Tongue River Railroad will send coal from Otter Creek to China. The railroad and mine will pour 1.5 billion tons of new carbon dioxide in to our atmosphere.

At the very least, the Board needs to update its economic study in light of Dr. Power's work. It needs to include an alternative that analyzes the likelihood of export to China. Until it does so, it should choose the no action alternative and keep the coal in the ground. The latest intergovernmental poll on climate change, the Nobel Prize winners, which included Steve Running who teaches here at the university. The latest report warns that our profligate burning of coal will trigger an "abrupt or irreversible tipping point" if we don't stop. Tipping points in runaway global warming are what keep all of us at 350 Missoula up at night. It astonishes us that the Board has figured out a magic formula to completely ignore them.

This is an immoral act, ignoring the new carbon bomb at a time when all the data is clear, that this railroad and this mine will lead to a disaster for our children and grandchildren. The United States must transition into a new carbon-free electrical power economy as rapidly as possible. We have the technology. We have the money. We have the workers to build a no carbon alternative to these incredibly destructive new railroads, new coal mines, and Asia's new coal-fired power plants.

The Board needs to include 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 the Board adds this alternative, it should choose the no action alternative, and keep the coal in the ground, which brings to my last point.

For the sake of argument, let's assume the Board's economic analysis is correct, that Otter Creek coal will displace Powder River Basin coal and be sold to plants within the eastern United States, or even at Colstrip. The Board says for

every ton of Otter Creek coal sold on the market, other Power River coal will not be mined in an existing mine. Nearly went for one. Otter Creek coal will be mined. Some existing job, some existing mine will lose that coal.

What the EIS is basically saying is that Union miners will lose their jobs at these other mines. The vehemently anti-union Arch Coal Company builds the Otter Creek mine. Arch Coal currently has a 3% union workforce. A federal agency should not be busting unions. The Board should include an analysis of the railroad and its effects on our existing workforce. Until it does so, we'll call this alternative U, it should choose the no action alternative, and keep the coal in the ground.

My conclusion, like Tom Powers, is that this big study is the same bait-and-switch that Arch Coal did with the Montana Land Board a few years ago. No one in his right mind thinks that Montana coal will go to the domestic market. There is no domestic market for coal. Instead, we must not build this railroad, we must choose the no action alternative, and we must keep the coal in the ground.