

Mailing: 3700 Osuna Rd NE
Suite 504
Albuquerque, NM 87109
Tel: (505) 322-2152
Fax: (505) 322-2155
Email: info@HealthActionNM.org
Website: www.HealthActionNM.org



July 20, 2016

Secretary Sally Jewell
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240

Director Neil Kornze
Bureau of Land Management
1849 C Street NW, Rm. 5665
Washington DC 20240

Dear Secretary Jewell and Director Kornze:

Health Action New Mexico works to empower consumers to build healthy communities and secure better health care for families. Our team works in partnership with local organizations, faith-based entities, civic groups, businesses, everyday citizens, and community advocates across New Mexico to bring about change. **We support reforming the outdated federal coal program to ensure that the impacts on public health are factored into decisions on whether to lease coal, and applaud the Department of Interior and Bureau of Land Management for taking steps to reform the program.**

According to New Mexico's Energy, Minerals, and Natural Resources Department¹, over 23 million tons of coal were produced from New Mexico coal mines in 2010. As of 2012, four of the nine permitted mines in New Mexico were producing and much of that coal is publicly owned and managed by the federal government.

As described below, each stage in the life cycle of coal development has an impact on public health and on the health of our environment. The human health and environmental impacts and full costs of each stage in the coal development life cycle must be factored into the reform of the federal coal program. Any reforms should aim to eliminate these impacts.

According to research by the Center for Health and the Global Environment at the Harvard School of Public Health² (CHGE), "The economic, health and environmental impacts associated with extraction, transportation, processing, and combustion cost the U.S. public between a third to over half a trillion dollars annually." Coal mining regions have 11,000 excess deaths annually from lung cancer, heart, respiratory and kidney disease. Lives lost in coal mining regions are evaluated at \$74.6 billion per year.

¹ <http://www.emnrd.state.nm.us/MMD/Coal-FAQs.html#CoalinNM>

² <http://www.chgearvard.org/resource/explore-true-costs-coal>

These adverse health impacts are felt in New Mexico. In San Juan County, where coal activity is more prevalent, the American Lung Association (ALA) reports that residents are at an elevated risk for lung diseases. The ALA indicates there are 2,885 cases of pediatric asthma, 8,442 cases of adult asthma and 5,219 people diagnosed with COPD in this rural northwestern New Mexico county alone.

Measurable health effects of coal-related air pollution include increased rates of lung and heart disease. According to CHGE, 2005 data showed that “[p]articulates and oxides of nitrogen and sulfur kill over 24,000 people annually, including 2,800 from lung cancer.” Further, pollution from coal operations produces 38,200 non-fatal heart attacks annually.

Of particular concern, combustion from coal-fired utilities and industrial boilers causes mercury to be released into the air and therefore the ecosystem³. Microbes turn mercury to methylmercury, which builds up in fish and enters the human body when those fish are eaten. Mercury causes mental health issues and cardiovascular disease in people.

Moreover, ponds built next to coal mines and processing plants contain dangerous coal byproducts such as slurry, sludge, and fly ash that can contaminate the air and water with toxins, heavy metals and radioactive elements. These waste ponds, which have a history of spilling, increase risk of property damage, injuries and deaths.

And here in New Mexico, the primary aquifers serving the Navajo Nation have been degraded by decades of irresponsible and rampant coal mining. A 2011 study by the University of Arizona found that one company’s decades of coal mining had [depleted Navajo Aquifer storage by 21,000 to 53,000 acre feet of water](#), well above what the company’s environmental consultants predicted.

While these localized threats are extremely important to address, we ask the agencies to consider coal’s global impacts: climate change. According to CHGE, coal generates 4/5 of utility sector greenhouse gases even though it comprises less than half of the nation’s electricity⁴. Soot absorbs solar radiation, further warming the atmosphere. Coal mines themselves emit methane⁵.

Because of climate change, we are already seeing impacts to the environment and public health. We are witnessing stronger hurricanes and more frequent floods⁶. After heavy rain events and intense storms there are increases in asthma and clusters of illnesses⁷. Heat waves affect vulnerable populations such as the elderly. Droughts contribute to food insecurity. These wide-ranging climate impacts must be considered as the agency evaluates the federal coal program. Finally, the government should not incentivize the use of coal through subsidies and loopholes. In 2007, the level of federal government subsidies for electricity and mining activities was estimated by the Environmental Law Institute to be \$5.37 billion or 0.27¢/kWh⁸. This not

³ <http://pubs.usgs.gov/fs/fs-016-03/>

⁴ <http://www.chgearvard.org/resource/explore-true-costs-coal>

⁵ http://www.chgearvard.org/sites/default/files/epstein_full%20cost%20of%20coal.pdf

⁶ <http://www.chgearvard.org/resource/explore-true-costs-coal>

⁷ http://www.chgearvard.org/sites/default/files/epstein_full%20cost%20of%20coal.pdf

⁸ http://www.chgearvard.org/sites/default/files/epstein_full%20cost%20of%20coal.pdf

only shortchanges taxpayers billions of dollars in lost revenues, but actually incentivizes damages to public health, costing society many billions of dollars.

Thank you for considering the impacts that coal mining on public lands has to our health, as you update and take comments on the Programmatic Environmental Impact Statement for the federal coal program. We ask that the information on these impacts outlined above be factored into analyses that determine the revisions to this program and that the overall revisions to the program seek to minimize or eliminate these impacts.

Sincerely,



Barbara K. Webber
Executive Director
Health Action New Mexico

Health Action New Mexico – Albuquerque, New Mexico
Alliance of County and Tribal Health Councils (38 Councils) – Santa Fe, New Mexico
NM Public Health Association (199 members) – Albuquerque, New Mexico
Casa Barelás – Albuquerque, New Mexico
Casa de Salud – Albuquerque, New Mexico
Centro Savila – Albuquerque, New Mexico
Con Alma Health Foundation – Santa Fe, New Mexico
Earth Works Institute – Santa Fe, New Mexico
Moving Anthony Forward - Anthony, New Mexico
New Mexico Environmental Law Center – Santa Fe, New Mexico
New Mexico Voices for Children - Albuquerque, New Mexico
New Mexico Center for Law and Poverty - Albuquerque, New Mexico
New Mexico Interfaith Power and Light - Albuquerque, New Mexico
New Mexico State Representative Jeffrey Steinborn – Las Cruces, New Mexico