June 10, 2019

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Bureau of Land Management
20 M Street, S.E., Room 4204,
Washington, DC 20003
Submitted online via BLM E-Planning: https://eplanning.blm.gov/epl-front-office/eplanning/comments/commentSubmission.do?commentPeriodId=76288


Responsible Officials:

On behalf of our millions of members and supporters, we urge you to restore the 2016 moratorium on new federal coal leasing until the federal government can complete a thorough programmatic environmental impact review of the federal coal leasing program. Given the massive climate, public health, and pollution costs of the federal coal leasing program, such a review should consider and ultimately implement an end to new coal leasing, a plan to phase out production on existing federal coal leases, and planning for reclamation and just transition for communities affected by federal coal production. It is indefensible to assert that a program singularly responsible for more than ten percent of the nation’s total climate pollution is “insignificant” and undeserving of public scrutiny or meaningful reform.

In 2019, there is no denying that continued expansion of coal mining and combustion is simply incompatible with any reasonable climate mitigation strategy. As you know, a massive and growing body of science, including the Fourth National Climate Assessment and IPCC 2018 Special Report provides overwhelming evidence that climate hazards are more urgent and more severe than previously thought, and that aggressive reductions in emissions within the next decade are essential to avoiding the most devastating climate change harms. The IPCC report concludes that pathways to limit warming to 1.5°C with little or no overshoot require “a rapid phase out of CO₂ emissions and deep emissions reductions in other GHGs and climate forcers.”¹ Put simply, that means, as scientists have emphasized,² no new coal.

A decision to lift the leasing moratorium without completing a programmatic environmental review necessarily involves the federal coal leasing program in its entirety. It therefore necessarily

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requires the United States to consider if or how that program should continue in light of its greenhouse gas pollution and the climate crisis. Thus, at precisely the time in which the world must begin rapidly decarbonizing to avoid runaway climate disaster, the BLM has offered a cursory and error-ridden analysis that improperly attempts to excuse lifting of the coal moratorium by dismissing the effects of coal leasing, mining, and combustion as minimal or non-existent. Even more so than in 2016, a leasing moratorium is both justified and necessary to prevent locking in more coal without an opportunity to consider long-overdue reforms to the leasing program.

The 88 billion tons of publicly-owned coal that BLM administers across 570 million acres of public land is unquestionably a globally significant source of greenhouse gas pollution. Mining of federal coal accounts for approximately 40% of all U.S. coal production, and, according to the U.S. Geological Survey, resulted in approximately 735 million metric tons of carbon dioxide combustion emissions in 2014, more than 13 percent of all U.S. carbon dioxide pollution in that year.

The potential carbon emissions from already-leased federal fossil fuel resources would essentially exhaust the remaining U.S. carbon budget consistent with a 1.5°C target. A 2015 analysis estimated that recoverable fossil fuels from U.S. federal lands would release up to 349 to 492 GtCO₂eq of pollution if extracted and burned. Of that, leased federal fossil fuels would release 30 to 43 GtCO₂eq of emissions, of which up to 20 GtCO₂eq would result from coal. Carbon emissions from already leased federal fossil fuel resources (30 to 43 GtCO₂eq) would, by themselves, essentially exhaust the U.S. carbon budget for a 1.5°C target (25 to 57 GtCO₂eq).

Similarly, a 2016 global analysis found that the pollution from burning the oil, gas, and coal in the world’s currently operating fields and mines would fully exhaust and exceed the carbon budget consistent with staying below 1.5°C. The reserves in currently operating oil and gas fields alone, even excluding coal mines, would likely lead to warming beyond 1.5°C. A 2019 analysis found that if U.S. coal production is to be phased out over a timeframe consistent with equitably meeting the Paris goals, at least 70 percent of U.S. coal reserves in already-producing mines must stay in the ground. It concluded that the United States must halt permitting new fossil fuel extraction and rapidly phase out existing production to avoid jeopardizing our ability to meet the Paris climate targets and avoid the worst dangers climate disruption impacts.

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4 Robiou du Pont, Yann et al., Equitable mitigation to achieve the Paris Agreement goals, 7 Nature Climate Change 38 (2017), at Supplemental Table 1.
5 Oil Change International, The Sky’s Limit: Why the Paris Climate Goals Require a Managed Decline of Fossil Fuel Production (September 2016), http://priceofoil.org/2016/09/22/the-skys-limit-report/ at Table 3. According to this analysis, the CO₂ emissions from developed reserves in existing and under-construction global oil and gas fields and existing coal mines are estimated at 942 Gt CO₂, which vastly exceeds the 1.5°C-compatible carbon budget estimated in the 2018 IPCC report on Global Warming of 1.5°C at 420 GtCO₂ to 570 GtCO₂.
6 The CO₂ emissions from developed reserves in currently operating oil and gas fields alone are estimated at 517 Gt CO₂, which would likely exhaust the 1.5°C-compatible carbon budget estimated in the 2018 IPCC report on Global Warming of 1.5°C at 420 GtCO₂ to 570 GtCO₂.
In addition to its climate incompatibility, federal coal faces increasingly tenuous economic realities and presents significant harm to public health, land, water, air, and wildlife. As markets shift toward more cost competitive non-coal energy sources, the need to ensure reclamation and facilitate equitable economic transitions in now coal-dependent communities will grow. Thus, BLM should couple a federal coal leasing moratorium with a programmatic environmental impact statement that plans for the inevitable transition away from federal coal production in a way that is orderly and that provides for climate goals, equitable economic transition and mitigation, and environmental justice in coal-dependent and coal-impacted communities.

Failure to heed climate and economic warnings by continuing the federal coal leasing program will lock-in dangerous climate disruption while starving coal-dependent communities of orderly economic transition and mitigation. Now is the time for the United States to act. We urge you to keep in place the 2016 moratorium on new federal coal leasing, undertake a programmatic environmental impact statement to consider necessary reforms to the program, and ultimately to consider and adopt an alternative that ends new coal leasing and plans a course of declining production on producing federal coal leases and a just transition for communities now dependent on and affected by federal coal production.

Sincerely,

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