

My name is Dr. Diana Rempe. I am a psychologist and I live in North Portland, Oregon.

As I looked through the draft EIS, I came upon chart 6.1 that asks if there are adverse effects expected from allowing this project to proceed. To twenty-two out of twenty-three of the questions, the answer is yes. Which begs the question, why are we continuing with this process at all? The reason I hear again and again is that it will create jobs.

I want to speak to one aspect of these potential jobs—the health risks to workers. In 1969, the Coal Mine Health and Safety Act was created to protect the health of miners. Despite apparent advances, in 2012 researchers at the National Institute for Occupational Safety and Health discovered an almost 10-fold increase in coal workers' pneumoconiosis—or black lung disease. And, of particular importance to this project, the finding led to the CDC looking closely at surface mine workers—an understudied group. Here too, evidence was found of serious, occupation-related respiratory illness in many of the workers.

What this really speaks to is that coal work remains an occupation with great health risks. These risks are exacerbated by the fact that workers who will be exposed to the most coal dust will also be the people who are regularly exposed to highest levels of diesel particulates and other air toxins. In the case of particulate matter, the health risks correlate with exposure and there is no level of exposure at which adverse health risks are not seen.

This draft EIS does not have enough data in it to convince me that this would be safe work, when there is substantial evidence to the contrary. It most certainly does not follow the precautionary principle—by first insuring the protection of workers' health.

We need a comprehensive health impact assessment. Truly, given the undeniable threat to worker health, we should take the No-Action alternative. We need to move beyond these sorts of projects—and

focus instead on creating living wage jobs that are healthy for workers and the greater community.

David J. Blackley, Cara N. Halldin, and A. Scott Laney "Resurgence of a Debilitating and Entirely Preventable Respiratory Disease among Working Coal Miners", *American Journal of Respiratory and Critical Care Medicine*, Vol. 190, No. 6 (2014), pp. 708-709.

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Pneumoconiosis and Advanced Occupational Lung Disease Among Surface Coal Miners — 16 States, 2010–2011. (2012, June 15). Retrieved May 23, 2016, from <https://www.cdc.gov/mmwr/preview/mmwrhtml/mm6123a2.htm>