

**The Alaska Center \* Appalachian Citizens Law Center  
Back Country Horsemen of New Mexico \* Black Warrior Riverkeeper  
Citizens Against Longwall Mining \* Citizens for Clean Air  
Citizens United for Responsible Energy Development \* Cook Inlet Keeper  
Dakota Resource Council \* Earth Care \* Greenpeace \* HEAL Utah  
Health Action New Mexico \* Las Cruces Green Chamber of Commerce  
League of Conservation Voters \* The Mountain Pact \* Mountain Watershed Association  
National Wildlife Federation \* Natural Resources Defense Council  
New Mexico Sportsmen \* New Mexico Voices for Children  
New Mexico Wildlife Federation \* NextGen Climate \* NextGen Climate America  
Northern Plains Resource Council \* Organizers in the Land of Enchantment  
Partnership for Responsible Business \* Powder River Basin Resource Council  
Protect Our Winters \* Public Citizen \* Sheep Mountain Alliance \* Valley Watch  
Vet Voice Foundation \* Western Colorado Congress  
Western Environmental Law Center \* Western Organization of Resource Councils  
West Virginia Highlands Conservancy \* The Wilderness Society  
Youghiogheny Riverkeeper**

July 28, 2016

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

Submitted electronically to: [BLM\\_WO\\_Coal\\_Program\\_PEIS\\_Comments@blm.gov](mailto:BLM_WO_Coal_Program_PEIS_Comments@blm.gov)

Dear Secretary Jewell,

On behalf of our millions of members across the nation, we commend you for initiating an “open and honest conversation” about ways the federal coal program should be reformed. Our groups and our members are just wrapping up our engagement in the scoping process for the Programmatic Environmental Impact Statement (PEIS) and have actively participated in the robust opportunities for public engagement offered by the Department, including the six public hearings held around the country.

Many of our organizations are also submitting detailed written comments to the Bureau of Land Management (BLM). We hope you find these comments and resources useful as you decide on the next steps to reform the federal coal program.

Our organizations strongly believe that any reform measures must achieve the following objectives:

- Ensuring a fair return to the American public for the leasing and mining of our publicly owned mineral resources by increasing royalty rates and closing loopholes in coal valuation processes;
- Increasing transparency of and public oversight around the federal coal program;
- Preventing impacts of coal leasing, mining, and burning on the global climate;
- Better protecting our air, land, water, and wildlife resources; and

- Addressing the legacy issues of decades of federal coal mining, including ensuring reclamation of currently leased areas before new leasing can proceed.

To meet these shared economic and environmental goals, as part of its coal reform efforts, the Department should propose to replace Coal Production Regions and Leasing by Application with a new model of leasing that balances the nation's energy needs with the effects of coal mining, transportation and burning on air, land, water, wildlife resources and the global climate. The new leasing model must take into account the latest information on the availability of coal reserves, coal demand, and replacement energy sources. The Department must re-assert itself as the driver of the leasing process and acknowledge that leasing should only be carried out if it can protect our public land resources and is consistent with the public interest objectives of the Mineral Leasing Act.

We recognize and applaud the progress being made, but the Department can and must institute reforms that address systemic problems that are costing the public billions of dollars and exacerbating climate disruption. We urge you to adopt regulations and policies that will protect public lands, help prevent carbon pollution, ensure coal companies pay their fair share and provide transparency and oversight. Until such measures are adopted, we call on you to maintain the moratorium on new lease sales of publicly owned coal.

Thank you for your time and attention, and for your support of these important reform efforts.

Sincerely,

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