



July 28, 2016

Coal Programmatic EIS Scoping  
Bureau of Land Management  
20 M St. SE, Room 2134 LM  
Washington, D.C. 20003  
Email: [BLM\\_WO\\_Coal\\_Program\\_PEIS\\_Comments@blm.gov](mailto:BLM_WO_Coal_Program_PEIS_Comments@blm.gov)

**RE: Public Land Solutions Support for Programmatic Environmental Impact Statement on the Federal Coal Program**

Bureau of Land Management Planners:

Public Land Solutions writes today to express our support for the Programmatic Environmental Impact Statement on the Federal Coal Program (Coal PEIS).<sup>1</sup> The hallmark of any successful policy is continuous evaluation and, if necessary, reform. The federal coal leasing program has not gone through a programmatic review in more than 30 years, and we applaud the Bureau of Land Management (BLM) for pausing federal coal leases and taking this necessary step to ensure our public lands are managed appropriately.

In particular we support reforms to the federal coal leasing program that ensure taxpayers receive a fair return for the sale of our public resources, and that efficient and targeted regulations protect today's economy and reflect a current understanding of environmental and public health impacts from coal. As part of this initiative, we acknowledge that this pause in new coal leasing while the program is being reviewed allows for continued mining of coal under existing federal leases.

**Public Land Solutions**

Public Land Solutions (PLS) is a non-profit organization dedicated to providing comprehensive recreation planning and stakeholder coordination to support effective and sustainable public land planning solutions. We welcome the opportunity to comment on the Coal PEIS and how it can help protect and ensure recreation access and protection for our federal lands. Energy leasing is a large part of the federal government's land planning process, and therefore can directly affect recreation and gateway communities. We have participated in various opportunities for public input on this PEIS including public scoping meetings in Salt Lake City, Utah and Grand Junction, Colorado.

**The Programmatic Environmental Impact Statement on Coal**

The Coal PEIS ensures a smart and durable BLM coal leasing program that will work effectively in the future. The goal of the review is to provide a comprehensive overview of the federal

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<sup>1</sup> [http://www.blm.gov/wo/st/en/prog/energy/coal\\_and\\_non-energy/details\\_on\\_coal\\_peis.html](http://www.blm.gov/wo/st/en/prog/energy/coal_and_non-energy/details_on_coal_peis.html)

leasing program to make sure coal is being leased in a responsible and sustainable manner, and that American taxpayers are receiving a fair return for these leases. A series of public meetings have also informed the program, with input given from members of the public from all walks of life. This input is essential to the success of the review, and should be weighed carefully by DOI and the BLM. The review has also resulted in a pause on new federal coal leases while the review is being conducted. These actions are key elements of the Interior Department's effort to modernize the federal coal leasing program, a worthy and necessary goal that the BLM should strive to achieve and many gateway businesses support.

### **Federal Coal Leasing and Gateway Communities**

Many gateway communities across the West currently depend significantly on resource extraction industries to support local government and public needs. However, there are also increasingly more communities that are beginning to invest in more sustainable economic drivers, such as outdoor recreation and protecting the quality of life in a rural community. Unlike the rollercoaster commodities market represented by oil, gas and coal development, recreation remains relatively stable, has experienced explosive growth in the last decade, and as an economic sector significantly outperformed resource extraction during the Recession of 2008 in many places.

Outdoor recreation experiences and the protection of natural environments are the commodities of the future, and as such, recreation areas and assets on public land must be protected from the threat of industrial development and the impacts on air and water must be diminished. The end result of this review should contain a strong standard to ensure that any disturbance to recreation areas is minimized to the greatest extent possible and that operators continuously improve the effectiveness of environmental mitigation standards.

Accordingly, through this Coal PEIS we support the BLM taking a careful review of problematic issues and outdated policies, including:

- 1) Zoning: How to account for the environmental and public health impacts of the coal program including impacts to recreation areas and local environments that contribute to the quality of life for rural residents;
- 2) Administration: reforming the mechanism for if, how, when and where to lease coal; and
- 3) Royalties: Ensuring the sale of public resources results in a fair return to American Taxpayers.

\* \* \*

This coal leasing program review is a sound economic strategy because a modern and efficient program that brings certainty to regional economies is a win for both resource extraction and gateway communities. An updated leasing system is needed to modern coal mining and ensure protections for taxpayers and communities, particularly in the West where recreation and tourism on public lands is an essential and growing part of the economy. As representatives of gateway businesses and recreation interests across the West, we are encouraged by the PEIS as it will help local communities invest in the future of their public lands and recreation access. Please do not

hesitate to contact me about the points raised in this letter. I can be reached at [Katie@publiclandsolutions.org](mailto:Katie@publiclandsolutions.org) and (509) 430-3123.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Katie Ross", with a long horizontal flourish extending to the right.

Katie Ross  
Program Manager  
Public Land Solutions  
[www.publiclandsolutions.org](http://www.publiclandsolutions.org)

Cc: Neil Kornze, Director, Bureau of Land Management, [nkornze@blm.gov](mailto:nkornze@blm.gov)  
Mitchell Leverette, Chief, Division of Solid Minerals, [mleveret@blm.gov](mailto:mleveret@blm.gov)