

**Statement by Dan R. Bucks**  
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**Bureau of Land Management Public Meeting**  
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I thank the Bureau of Land Management (BLM) for conducting this second round of public meetings on the federal coal program. I also commend Secretary Jewell for her extraordinary leadership. Order 3338 directing this programmatic environmental impact statement (PEIS) and her earlier Order 3330 on mitigation policies are far-sighted measures of historic and, we hope, lasting impact.

The coal lease by application system is broken and should be replaced. It is an industry driven process that subsidizes company profits at the expense of a fair return to the American people, states and local communities. The lack of regional planning prior to leasing fails to account for the myriad environmental, social and long-term economic impacts of coal mining. Most importantly, the secrecy that hides leasing decisions betrays the public interest and undermines achieving results required by law.

When and where to lease federal coal, in what amounts and under what conditions, should be entirely public decisions. Working with the public before any bidding, Interior should begin by evaluating landscape scale impacts and national energy supply needs. The coal PEIS should design a modernized regional planning process. The PEIS should also implement Order 3330 on mitigation practices and the April 2014 strategies for improving mitigation policies recommended by Interior's Energy and Climate Change Task Force.

The leasing process itself should be thoroughly transparent. When Montana openly leased its Otter Creek coal tracts, it received lease payments more than twice the amount estimated by experts using the BLM valuation methodology. The BLM should adopt Montana's open process and should structure the PEIS around its anticipated use.

In considering changes in royalty rates, Interior should first eliminate all loopholes in the royalty base. Otherwise, expected revenues will only be undercut by some companies gaming the royalty system at the expense of others that play by the rules.

Finally, the PEIS should consider how Interior can support broader federal, state and local policies to meet the needs of coal dependent communities and workers as the nation undergoes an historic energy transition.

The coal PEIS is an enormous opportunity for Interior to make our nation and planet a better place to live. Please carry out this critical process with an inspired vision of future possibilities for humankind. Thank you.