

My name is Nicholas Nielsen. I support an action in favor of promoting coal production or a "No Action" alternative.

By restricting the availability of a lease, mining companies will financially not be able to withstand outages or invest the capital to mine available leases. An increase in royalty rate will force mining companies out of the picture and this will result in no royalty payments, costing return to taxpayers and jobs. On the other hand, if companies were incentivized and a royalty reductions were put in place, mining companies could further maximize reserves by mining challenging areas and provide more return for taxpayers. Is the EIS considering that discounts or reductions would increase the Maximum economic recovery of the coal?

In section 3.8 of BLM handbook 3073 it addresses the evaluation of export potential for coal in the fair market valuation. It states that specific requirements must be evaluated and considered in issuing coal leases. Why would this EIS need to evaluate the export potential in regards to fair market valuation when this section states that the BLM does this each lease sale?

In the recent 2013 audit of the BLM's coal management program 6 of the 13 recommendations for corrective actions were directed toward improving the work done on fair market valuations. Has the BLM not acted on or done a good enough job adjusting to these recommendations? If I worked on a project and within a short time frame, I had to reevaluate the project, I would expect my boss would ask about the quality and diligence of my work. Is the BLM not adjusting to the recommendations of the 2013 audit? Is a complete moratorium necessary to evaluate work that has already been done?

Part of the leasing process is the construction of an evaluation team. These teams have specific education and experience requirement that must be met. According to their required credentials and experience they should know and be able to prove that the process for fair market valuation and the return to the taxpayers is sufficient. The EIS is another way to justify conforming to a war on coal. In the announcement of this EIS it proves this by saying that the "we need to alter the program so that it is consistent with the Nations Goals". What are these goals based on and how are they defined? Information put out by the BLM regarding the EIS puts a large emphasis on restricting and limiting coal, which would make maximizing the reserve difficult. This bias along with the anti-coal movement makes coal companies seem like an enemy and like they do not care about the environment. This EIS is more of an environmental directive at an easy target. Coal Companies. What makes a coal company? Ultimately we have an owner who assumes financial reliability but those who do most of the leg work for the owners make up a coal company. We are people who live in the areas the mines are located. So who better to take stewardship for the local environment than those who live there. For example, the mine I work at discharges water into my drinking water. At the mine level, I am one who can potentially work on projects dealing with that water. My children drink that water. People who are part of these companies help come up with plans and programs to eliminate these issues. Is the EIS going to take into consideration the programs, plans, and costs that mining companies have in place to help eliminate environmental concerns or are they just looking to justify an added cost?