**Comments on the PEIS Initiated by Secretarial Order 3338**

**The BLM Should Cease Granting New Permits to Mine Coal**

Coal is a dying industry. It is non-renewable, its markets are shrinking, it's being supplanted by natural gas, wind, & solar & its climate & cleanup costs outweigh its benefits.

In the past few years, nearly 30 coal companies have gone bankrupt and more than 260 mines have closed. The largest players of the coal industry, like Peabody Energy, Arch Coal, & Alpha Natural Resources have fallen. There is no need to give new permits to an industry in its death throes. Interior Secretary Jewell, herself, has noted there are enough coal reserves already under lease to sustain current levels of production from federal land for 20 more years.

The four largest coal companies alone have $2.7 billion in outstanding mine cleanup costs, and no insurance in place to cover the costs. Three have filed for bankruptcy in the last year, likely walking away from billions in reclamation costs in Appalachia & the Powder River Basin, on top of the $4 billion worth of mine cleanup the coal industry has already abandoned.

In Moab, Utah, where I live, we are aware of what it can cost taxpayers when companies file for bankruptcy, leaving behind a toxic mess to cleanup. When completed, perhaps not until 2029, the Moab UMTRA Project will cost the American public at least $1 billion to remove tailings & ground water contaminants threatening the Colorado River.

Mining companies have an obligation to buy insurance to cover the cost of cleanups. But Congress has allowed some of the supposedly more financially secure coal producers to "self bond," meaning they promise to pay for cleanups themselves. But "self-bonding" failures can hurt taxpayers and cleanup site residents for years, just like in Moab, as mining companies file for bankruptcy or spend their dwindling dollars elsewhere trying to stay afloat. No wonder a recent congressional estimate puts the nation's unattended cleanup liabilities at $3.6 billion.

One glaring example of self-bonding gone bad - a deal between Arch Coal and regulators in Wyoming means taxpayers will eventually get stuck with the bulk of the cleanup costs. The company has agreed to set aside at most only $75 million to cover reclamation costs of more than $450 million. Regardless of whether or not coal leasing resumes on public lands, the policy of self bonding has failed & all companies should be required to purchase insurance that covers their cleanup costs.

It is true that many communities, like Tonawanda, NY that depend on the coal industry for jobs and for tax revenue are in trouble. There, community, environmental, & labor groups established a coalition to address the problems, and the recently passed NY state budget gives financial assistance to the schools and local governments losing tax revenues. This type of cooperative action turns a community facing a loss into one building its future. Similar actions must be done nationwide with federal support for workers, businesses and communities.

The recent bankruptcies of the nation's leading coal producers are the latest harbingers of the steady decline of the coal industry. When conditions like today warrant it, multiple use does not mean permitting every use on public lands. When shifting market conditions have caused coal production to plummet to its lowest levels in 35 years, there is no need for the BLM to resume granting new leases.

Thank you.

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