

MR. BUCKS: Good Morning. My name is Dan Bucks, and I'm a former Montana Director of Revenue. I thank the BLM for conducting this second round of public meetings on the Federal Coal Program. You're on a good path. And I also commend Secretary Jewell for her extraordinary leadership. Order 3338 directing this Coal Program Review and her earlier Order 3330 on Mitigation Policies are farsighted measures of historic and, we hope, lasting impact. Now, 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 myriad economic environmental and long-term impacts of mining -- of coal mining. Most importantly, the secrecy that hides leasing decisions is contrary to 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 review should produce a modernized regional planning process. And it should also implement Order 3330 on mitigation practices and Interior's April 2014 report on mitigation strategies. The leasing process itself should be thoroughly transparent. When Montana openly leased its Otter Creek coal tracts, it more than doubled the lease payments as compared to earlier amounts estimated using the BLM valuation methodology. The BLM should simply adopt Montana's open transparent process and 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 gaining the royalty system at the expense of others that play by the rules. The PEIS should also consider how Interior can support broader Federal, State, and local policies to meet the needs of coal communities and workers as the nation undergoes an historic energy transition. This program review is an enormous opportunity for Interior to help 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.