

Federal Coal Program Programmatic EIS

Public Scoping Comment Card

Please submit your comments by **July 28, 2016** via one of the following methods:

E-mail:

BLM_WO_Coal_Program_PEIS_Comments@blm.gov

Mail:

Coal Programmatic EIS Scoping
Bureau of Land Management
20 M St. SE, Room 2134LM
Washington, DC 20003

PLEASE PRINT

Date: June 26, 2016

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National Wildlife Federation

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Public Disclosure. Before including your address, e-mail address, or other personal identifying information in your comment, please be advised that your entire comment, including your personal identifying information, may be made publicly available at any time. While you may request that we withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Comments (use back if needed):

Federal Coal Program PEIS Public Scoping Meeting
Pittsburgh, PA - June 28, 2016

Statement of Jane Kirchner, Online Philanthropy and Advocacy Manager
National Wildlife Federation

I want to thank the Department of Interior for conducting a review of the federal coal leasing program because this program has such an immense and lasting impact on America's public lands—these are the lands that belong to all of us. And I very much appreciate the public input sessions and comment period so citizens truly have an opportunity to share their concerns directly with you.

Today I'd like to express concerns regarding the protection of wildlife and water quality from the impacts of mining coal on public lands. Unfortunately, the resultant pollution and degradation from coal mining can continue for thousands of years after the coal has been extracted. Here are a few examples of the impacts to consider as you make reforms to the program:

- Degradation of aquatic habitats is a major impact of coal mining, and may be apparent many miles from a mining site. Sediment contamination of surface water is common with mining. Sediment yields may increase to a thousand times their former level as a result of strip mining. The heaviest sediment pollution of a drainage normally comes within 5 to 25 years after mining. In some areas, unreclaimed spoil piles continue to erode even 50 to 65 years after the area has been mined.
- The presence of acid-forming materials exposed as a result of mining can affect aquatic wildlife by eliminating habitat and by causing direct destruction of some species. Lesser concentrations can suppress productivity, growth rate and reproduction of many aquatic species. Acids, dilute concentrations of heavy metals, and high alkalinity can cause severe damage to wildlife in some areas. **The duration of acidic-waste pollution can be long; estimates of the time required to leach exposed acidic materials in the Eastern United States range from 800 to 3,000 years.** This is way beyond a business life-cycle calculation.
- Mule deer, pronghorn antelope, sage grouse, elk and hundreds of bird species including eagles make their home in the Powder River Basin of Wyoming and Montana. The National Wildlife Federation and Natural Resources Defense Council commissioned a study of the health of wildlife in this major coal producing region. This region is also the location of the nation's largest surface coal mine. More than 70% of the mule deer and pronghorn herds evaluated were found to be *unhealthy*. Notably, of the mule deer herds evaluated, the only one that was found to be healthy was the one living in an area without any energy development within its boundaries.

I urge you to look beyond immediate or short-term, cosmetic reclamation. Reforming the federal coal program must include new protections, prohibitions, and management actions to fully protect wildlife populations and the very vulnerable habitats they depend on. Thank you very much.