Comments for the Programatic Environmental Impact Statement
June 21, 2016

The Department of the Interior is conducting a long overdue review of the federal coal leasing program, called the PEIS. One area needs special review.

This is the area of leases. Stronger rules should be in place to make the companies pay fair market vale. In the Powder River Basin, in the last twenty years, the majority of leases received only one bid. If the bid does not reflect fair market value, the sale should be denied. Royalties are 12.5% of the fair market value and are the way our country receives money for its natural resource. Also, a common practice is for the coal company to buy coal through a subsidiary at the domestic rate and then sell overseas for a higher rate, cheating our country out of the additional royalties. Reuters found that two companies, Arch Coal and Peabody Energy, sold coal to India, South Korea, ~~India~~ and Japan and have not paid their full royalties. Now these companies have shaky financial ground under them and have filed for bankruptcy. Also, there is currently a process for the coal company to request a royalty rate reduction. If the coal company can't pay the royalty, then it can't afford the lease. Also, the leaser is supposed to have funds set aside to restore the land when finished. These funds need to be in place and untouchable by the coal company when the lease is awarded. The whole process needs to have close monitoring.

And to ensure the whole process is fair, no former coal company executives in the BLM or Department of the Interior should be allowed to be involved in the sales, processing, or oversight of leases.

Please include these suggestions in the PEIS and put them in the final rules.

The only things we get in abundance coming from Asia which burns this coal are CO2 which acidifies our oceans and mercury which poisons us.

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