



LEAGUE OF CONSERVATION VOTERS

May 8, 2015

U.S. Department of the Interior
Washington, DC 20460

Re: Comment Submission for the Office of Natural Resources Revenue, docket number (ONRR-2012-0004)

Dear Secretary of the Interior Sally Jewell,

The League of Conservation Voters works to turn environmental values into national, state, and local priorities. Our active and eager supporters are strong advocates for the environment and have supported building upon the proposed rule. LCV has gathered **34,373 signatures** in support of strengthening the final rule and ensuring that royalty rates for federal coal are fairly assessed through action alerts and social media posts to our members and supporters.

Please find below the petition these comments were submitted for:

Dear Secretary Jewell:

As a U.S. taxpayer concerned about dirty coal companies taking advantage of outdated rules when mining coal on federal land, I am writing in support of the Federal & Indian Coal Valuation Reform (RIN 1012-A13). I agree that the proposed rule is good step in the right direction to ensure that coal companies are not taking advantage of royalty loopholes that are costing taxpayers tens of billions; however, the rule does not go far enough in its present form.

In addition to closing royalty loopholes and ensuring that coal companies aren't making arm-in-arm transactions, the rule should ensure that the transaction rate on which the royalty is assessed accurately reflects the fair market value of coal.

Coal production should also be held to similar mineral production standards and subsidies for transportation, and coal washing expenditures should be capped at 50% of total costs similar to the oil and gas industry.

Lastly, the effective royalty rate assessed for surface coal should be at the statutorily mandated 12.5% and at least 8% for underground coal. There must also be transparency to show that effective royalty rates are being adequately assessed.

The proposed rule was a step in the right direction but I believe making the rule stronger will go a long way to ensure that American taxpayers are receiving a fair and balanced return on coal production on federal lands.

Thank you for all that you do to protect our environment and our future.

Sincerely,

League of Conservation Voters