

November 26, 2018



Pennsylvania Environmental Quality Board  
P.O. Box 8477  
Harrisburg, PA 17105-8477

Re: Federal Office of Surface Mining Reclamation and Enforcement Program Consistency.  
[48 Pa.B. 6844][Saturday, October 27, 2018]

Dear Environmental Quality Board:

The Pennsylvania Coal Alliance (PCA) appreciates the opportunity to provide comment on the Environmental Quality Board's proposed rulemaking *Federal Office of Surface Mining Reclamation and Enforcement Program Consistency*; Available for public comment [48 Pa.B. 6844][Saturday, October 27, 2018].

The Pennsylvania Coal Alliance is the principal trade organization representing underground and surface bituminous coal operators in Pennsylvania, as well as other associated companies whose businesses rely on coal mining and a strong coal economy. Pennsylvania is the third largest coal producing state, and PCA member companies produce almost 90 percent of the bituminous coal mined annually in Pennsylvania, which totaled over 47 million tons in 2017.

Bituminous coal mining helps drive the Pennsylvania economy, supporting over 30,000 direct, indirect, and induced jobs, while contributing \$4 billion annually to the state's economy. The Pennsylvania coal industry creates this economic value in communities across Pennsylvania, with multiple company locations in more than half of Pennsylvania's counties. The industry accounts for 25 percent of the employment in some regions of the state, up to 40 percent of the local tax base, and often serves as a community's financial cornerstone for economic development.

The Pennsylvania Department of Environmental Protection worked within the Department's advisory board process, and consulted with the Mining and Reclamation Advisory Board (MRAB) in developing the consistency regulations. While there is some need to further develop guidance or policy on the definition of surface mining activities, the MRAB unanimously voted to move forward with the regulation and continue constructive conversation regarding the specifics of that definition.

As such, the Pennsylvania Coal Alliance supports the proposed regulatory changes in the aforementioned proposed rulemaking.

Sincerely,



Rachel Gleason  
Executive Director  
Pennsylvania Coal Alliance