



March 17, 2015

**Concerns regarding findings of Act 54 report and impacts of longwall mining**

Dear Members of the Citizens Advisory Council:

We the undersigned are concerned about the findings of the fourth Act 54 Report assessing the impacts of underground coal mining and support the Center for Coalfield Justice's comments on the report. In evaluating the effects of underground coal mining between 2008 and 2013, this report reveals alarming gaps in policy and a regulatory system which allows widespread destruction of homes, domestic water supplies, streams, wetlands, aquatic life, and damage to ecosystems.

Specifically, we are concerned about the following:

- 230 cases of damage to buildings and homes were reported from longwall mining subsidence.
- Longwall mining resulted in the harm or destruction of more than 39 miles of streams. Only 23% of streams undermined during this period escaped significant flow-loss or pooling.
- Flow disturbances harmed entire ecosystems, leading to excessive stream vegetation growth, increases in undesirable insects, reduced aquatic insect diversity, reductions in fish populations, habitat space reduction, higher water temperatures, and lower oxygen levels.
- The ability to repair damage to streams that have been undermined and have experienced subsidence impacts remains largely unknown.
- DEP's rampant disorganization of data severely hampers community engagement and enforcement actions.

These impacts are extreme and unacceptable. As residents of the Commonwealth, we want clean water, air, and soil, naturally flowing streams and rivers which are protected from the devastating impacts of mining. We ask that the Citizens Advisory Council make the following recommendations to the DEP:

- Address data organizational and management issues by implementing an information system and standards for data that are enforced to facilitate meaningful evaluation of information, accessibility, and transparency.
- Overhaul the permitting process which allows mining companies to simply revise existing permits continuously without meaningfully updating the baseline hydrological information.
- Adopt an ecosystem view which considers cumulative impacts in its approach to approving and issuing mining permits.
- Stop permitting full extraction mining under streams.

Sincerely,  
The Undersigned