



ILLINOIS COAL ASSOCIATION

212 S. Second Street • Springfield, IL 62701
(217) 528-2092 phone • (217) 523-5191 fax • www.ilcoalassn.com

September 4, 2015

The Honorable Rob Bishop, Chairman
The Honorable Raul Grijalva, Ranking Member
House Natural Resources Committee
1324 Longworth House Office Building
Washington, D.C. 20515

Dear Chairman Bishop and Ranking Member Grijalva:

On behalf of the Illinois Coal Association (ICA), I'm writing in support of the H.R. 1644, "Supporting Transparent Regulatory and Environmental Actions in Mining Act," or the "STREAM Act." The STREAM Act will limit the ability of the Office of Surface Mining Reclamation and Enforcement (OSM) to implement their proposed Stream Protection Rule (SPR). The SPR will have a negative impact on the operations of ICA members.

The ICA is a professional trade association created in 1878 to promote the Illinois coal industry. All Illinois coal operators are members of the ICA, and in 2014 they produced 58 million tons of coal, contributing over \$2 billion to the state's economy. The industry employs nearly 5,000 workers, and is responsible for another 28,000 indirect jobs.

OSM's proposed Stream Protection Rule is a rule in search of a problem. What OSM originally described as a minor regulation confined to one coal region has metastasized into what it now calls "a comprehensive, nationally applicable rule" that will add to the more than 40,000 coal miners who have lost their jobs since 2011. OSM's own internal analysis of an earlier, and comparably more modest, version of the rule showed more than 7,000 coal miners would lose their jobs in 22 states. An independent analysis showed far worse impacts, with job losses approaching 80,000 people.

The proposed SPR is economically damaging, redundant, and serves no environmental purpose. Based on outside analysis, OSM's previous draft proposal showed recovery coal reserves would plummet by 30-41 percent, an annual loss in coal production valued at \$14-20 billion, and losses in federal and state revenues of \$4-5 billion.

Further, in this proposal OSM is attempting to take over the job of the Environmental Protection Agency, the U.S. Army Corps of Engineers and states in protecting water quality that is already protected through existing Clean Water Act programs. OSM's own Annual Evaluation Reviews of state regulators routinely show outstanding environmental performance with 90 percent of active operations free of any off-site impacts.

The "STREAM Act" provides much needed transparency of the proposed SPR while preventing any duplicative rulemaking by the Office of Surface Mining Reclamation and Enforcement.

The ICA commends the Natural Resources Committee for working to advance this important piece of legislation, and urges its passage.

Sincerely,

Phillip M. Gonet, President