

17 South High Street, Suite 310  
Columbus, Ohio 43215



**TEL** 614 228 6336  
**FAX** 614 228 6349

September 8<sup>th</sup>, 2015

The Honorable Rob Bishop  
1324 Longworth House Office Building  
Washington, D.C. 20515

Dear Chairman Bishop,

On behalf of the Ohio Coal Association, I'm writing in support of the H.R.1644, "Supporting Transparent Regulatory and Environmental Actions in Mining Act," or the "STREAM Act."

The Office of Surface Mining Reclamation and Enforcement's (OSM) proposed Stream Protection Rule (SPR) 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 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, 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" works to degrade the proposed SPR by ensuring transparency during regulatory decision-making and stopping duplicative rulemaking. The Ohio Coal Association commends the Natural Resources Committee for working to advance this important piece of legislation.

Sincerely,

A handwritten signature in blue ink that reads "C.R. Palich".

Christian R. Palich  
President, Ohio Coal Association