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Comments to Citizens Advisory Council
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Introduction

On behalf of the Center for Coalfield Justice, we respectfully submit the following comments on the Third Act 54 Five-Year Report (August 2003 – August 2008). Thanks to Steve Kunz of Schmid and Company and the Citizens Coal Council for compiling a thorough review of the Act 54 Report. Rather than duplicate these comments, we primarily want to draw attention to the following additional concerns:

- The Third Act 54 Report inadequately addresses impacts to Ryerson Station State Park and Duke Lake Dam;
- Damage to Duke Lake Dam indicates a significant regulatory flaw, due to anomalous movements outside of the DEP-defined angle of influence;
- This damage was nonetheless conclusively determined by the Gannett Fleming field research and by DiGioia, Gray and Associates' concluding remarks to be attributed to longwall mining;
- Interstate 70 was also impacted by such anomalous ground movements;
- I-70 and Ryerson Station State Park represent two major infrastructure investments by the State of Pennsylvania;
- Citizens of the Commonwealth are being adversely impacted and not adequately compensated by coal mining companies, including damage to both public and private resources;
- Improved regulations and compensatory action needs to be taken to address the above concerns and adequately protect, restore and preserve public and private property in SWPA.

Respectfully submitted,

Raina Rippel, Executive Director
Center for Coalfield Justice