



**Western Pennsylvania Coalition for Abandoned Mine Reclamation**

226 Donohoe Road Suite 110, Greensburg, PA 15601

(724) 832-3625 (724) 832-3625 (fax)

andy@wpcamr.org www.wpcamr.org www.AMRClearinghouse.org

13 October, 2010

Mr. Edward Hanlon  
USEPA Science Advisory Board  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460

**RE: Written Comment to the SAB Mountaintop Mining Panel**

I agree with the Science Advisory Board in cautioning not to expand this benchmark outside of the specific environmental conditions of the study area (ionic constituents, habitat stressors, etc). We have to understand the practical nature of setting this benchmark if it is extended beyond the study.

In Pennsylvania, there are numerous volunteer watershed groups, who continue to clean up streams long affected by Abandoned Mine Drainage (AMD). In fact, streams have recovered due to those watershed groups. This is truly an amazing feat and it's due to the volunteer spirit in this State.

This proposed conductivity benchmark, if applied beyond its specific area of study and in a broad manner, could effectively stop the hard work of all our watershed groups from treating AMD. It is because of these groups that Pennsylvania's streams continue to improve.

There are and will be more instances where the benthic community of the receiving stream will indicate improvements (even partial improvements) regardless of the conductivity benchmark. It isn't in our best interest to negate the partial or complete stream improvements for the sake of achieving a certain physico-chemical limit. Additionally, it is possible that the perceived effect of elevated conductivity on certain ecologically relevant taxa could very well be influenced by the concentrations and interaction of specific ionic constituents found at the sites within the study.

It is imperative that we continue working to find practical solutions to help our volunteer communities improve our waterways while fostering partnerships and understanding between industrial interests and our environmental community.

Sincerely,

Andy McAllister  
Regional Coordinator

***“Take a stand for reclamation”***