

From: Ron Troyer <rgtroyer@verizon.net>
Sent: Wednesday, February 08, 2012 12:03 PM
To: Callaghan, Thomas
Subject: Rule changes in noncoal mining fees. Ron Troyer, Waterford, PA

Mr. Callaghan,
Thank you for encouraging comments to the proposed rule changes regarding permitting and fees for the noncoal mining industry. My comment pertains primarily to the proposed fee for Large Surface Mining- below water new permits, as well as Large Surface Mining permits-not below water. As stated in the bulletin, "*The act thus authorizes the Department to collect fees from noncoal mining permit applicants and permittees in an amount sufficient to cover the Department's costs of administering the noncoal mining regulatory program, so long as the amount of fees collected does not exceed those costs*". It goes on to say, "*The permit application fee is intended to cover only the Department's cost to review noncoal mining permit applications.*"

Because the actual engineering costs related to filing an application are extensive and is borne by the applicant with little or no input from the Department it appears to me that these fees are excessive. It would seem that the review process would not require as much time as the actual engineering process of gathering and calculating the required information. Would the Department clarify to the public the average number of hours the review process requires and the estimated hourly rate applied. It's likely that this fee as proposed will prohibit some producers from permitting some gravel deposits formerly considered economically viable.

Sincerely,
Ronald Troyer

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