Illinois Department of
Natural Resources
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Pat Quinn, Governor
Marc Miller, Director

LAND RECLAMATION DIVISION
Memorandum No.2014-01

To: All Coal Mine Operators/Consultants

From: Scott K. Fowler, Supervisor
Land Reclamation Division

Date: February 10, 2014

Re: Timing of Logging Operations

In the past it has been the policy of the Department to allow logging operations on areas included in pending permit applications if it could be shown that the logging was being done by an entity other than the applicant and not at the direction of the applicant and if the logging operation did not involve the grubbing of stumps.

Recently OSM in response to events in Pennsylvania has stated that "It is our position that timber removal, or any type of land clearing at proposed coal mine permit sites, which are in pre-application or application status, could be considered a surface coal mining activity conducted to facilitate the proposed mining operation."

In order to comply with this interpretation the Department is implementing the following policy concerning logging operations on areas included in applications submitted for completeness review or that have been filed with the county clerk for public review:

- The Department must grant permission to conduct logging operations on areas within a pending application prior to such operations being conducted.
- Logging conducted on an application area must be done as part of a long term timber management plan developed for the entire area and not restricted to the application area.
- If logging is allowed by the Department, operations conducted in conjunction with the logging may not include grubbing or other forms of stump removal or any other activities to facilitate the proposed mining operation.

If logging operations are conducted in violation of the above procedures the applicant shall be subject to enforcement action.