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May 7, 1999

Mr. Paul McNutt
Bureau of Land Management
Nevada State Office
P. O. Box 12000
Reno, Nevada 989520-0006

Dear Mr. McNutt:

The State of Alaska has reviewed the Bureau of Land Management's (BLM) proposed revisions to 43 CFR 3809 and the accompanying Draft Environmental Impact Statement (EIS) addressing mining on public lands. We appreciate the opportunity to submit these comments. This letter represents the consolidated views of the State's resource agencies. While the proposed changes contain some useful improvements to the regulations, we have serious concerns with the regulations as proposed and with the process being used.

The comments below are divided into four sections: general comments, comments on specific sections of the regulations, corrections to BLM's summary of Alaska mining law, and responses to the questions on which BLM specifically invited comment in the Federal Register notice.

Accompanying this letter is a 1997 State of Alaska publication that describes reclamation in Alaska. It also contains Alaska's Mining Reclamation Awards for miners who have gone beyond the requirements of the law and who set a standard for conservation of the land. Miners recognized in this publication were nominated by state and BLM personnel for their exemplary reclamation. The awards show that the good news about reclamation is often overlooked in discussion of regulation changes. Exemplary reclamation is possible and often done under the present regulatory system.

General Comments

The Public Comment Period Should be Extended for the National Academy of Sciences (NAS) Study. Over the last two years most of the western stateshave worked with BLM on interim drafts of the proposed regulations. The Western Governor's Association (WGA) and the states, including Alaska, have repeatedly requested a detailed analysis of problems with the existing

regulations. For example, when states met with BLM's 3809 task force in March 1997, the task force was asked to focus on current regulatory conditions and identify specific problems. Further, states asked that if problems are identified, BLM should determine if those problems occurred as a result of improper implementation or bad rules. Such an analysis that would allow BLM to focus regulatory changes on problems that cause real environmental effects. Despite repeated requests, including the WGA request in March 1997, this valuable exercise has not been completed.

To analyze potential problems associated with the existing regulations, Congress funded the National Academy of Sciences (NAS) to complete the study the states have long requested. The NAS study is scheduled for completion on July 31, 1999. We strongly urge that BLM extend the comment period on the proposed regulations until 120 days after the completion of the NAS study. In that way, all involved will have a chance to review the NAS report and to comment on the proposed regulations in light of it. Refusal to wait for and incorporate the advice of the NAS robs the public and the states of the ability to incorporate the best scientific advice concerning these regulations.

BLM Duplicates Other Agencies' Authorities. The regulations appear to overstep BLM's authorities and duplicate the work of other agencies: especially in the area of water quality and wetlands. The Environmental Protection Agency (EPA) has the authority to protect surface waters. Implementation of this authority has been delegated to the states through the Clean Water Act. Ground water is the sole purview of the states under state law. The Alaska Department of Environmental Conservation (DEC) establishes water quality standards for surface and ground waters with the consent of the EPA. The proposed regulations appear to give BLM an overlapping jurisdiction over the water quality effects of mining. We do not believe there is legal authority or justification to do so; nor do we believe BLM has the scientific expertise to make appropriate water quality decisions now reserved to EPA and the State.

A similar problem occurs with wetlands. The proposed regulations duplicate the wetland protection responsibilities of the US Army Corps of Engineers (COE). The duplication is unnecessary and counter productive. Duplicate authorities increase cost and confusion without increasing the protection for public resources.

Mitigation. The definition of mitigation includes off-site compensation and replacement. In Alaska, state and federal agencies prefer to emphasize on-site mitigation which is workable in nearly all instances. Unlike much of the U.S., Alaska has an abundance of most habitat types. Small losses of any individual habitat type rarely have significant effect on fish and wildlife populations. Those habitat loses, when unavoidable, should be reclaimed as part of the project, thus avoiding off-site compensation in Alaska. The COE rarely requires off-site compensation for wetlands impacts in Alaska. We see no reason why BLM should be different.

Off-site compensation or replacement may be justified in limited circumstances if impacts threaten a life-stage of a locally important population of wildlife. In the few cases where this

occurs, the compensation or replacement should be targeted at sustaining that specific population. A general authority to require off-site compensation of replacement is misguided.

This problem is compounded by the fact that the regulations give unrestrained authority to require mitigation without any direction to the staff about when compensation or replacement is necessary. This lack of criteria in the regulations leaves the decision to the whim of the permitting staff on individual projects.

Elimination of Notice-Level Operations — Effect on Small Placer Mines. The detailed information required by these operations is appropriate for large hard-rock mines with a significant environmental staff. The requirements will overwhelm the operator of small mines. This, in combination with the potential to eliminate notice-level permitting, will put the small miner out of business. This result will occur not because of any effect on the environment, but because the miner will be unable to cope with the paperwork required.

Small placer mines are very simple operations. It is not necessary to require them to submit quality assurance plans, gather detailed baseline data, describe their analytical methods, etc. While some level of information is necessary, it is not necessary to require the same scope and level of detail for small placer mines as for large hard-rock mines.

Assessment of Alaska Law. Appendix D of the EIS summarizes Alaska law with respect to mining. The reported need for changes in 3809 regulations is based, in part, on an assessment of existing laws. However, the assessment of Alaska law has significant errors. The third part of this memo provides corrections to Appendix D.

Failure to Account for Alaskan Conditions. One-size-fits-all regulations fail to account for the diversity of Alaska's mining and environmental situations. When Congress passed the Surface Mining Control and Reclamation Act of 1977, they explicitly recognized that lack of experience with Alaska conditions and the diversity of environmental situations made it unclear that the proposed law for coal would appropriately apply to Alaska. In Section 708 of that Act they asked the NAS to determine whether the Act appropriately applies to Alaska conditions. The NAS study found that Alaska conditions were significantly different from those elsewhere in the U.S. and that the Act needed modifications to appropriately apply to Alaska. Specifically they found that, for Alaska: "...it is essential that mining and reclamation operations... be carried out with special cognizance of climatic conditions, particularly the cold winter temperatures and short summer growing season,... permafrost... [and] great geographic diversity. Any consideration of coal mining and reclamation...[should] keep regional differences in mind."

These conclusions, made for coal mining, are valid for hard rock mining as well. We find that many standards written for non-Alaska conditions do not apply to Alaska. For that reason, we believe that the one-size-fits-all proposal for the 3809 regulations will have serious problems for Alaska. In addition, there is now only one mid-sized hard-rock mine on BLM land in Alaska

(Nixon Fork). BLM lacks experience to make Alaska-specific standards for hard-rock mines in Alaska, and the approach to apply lower-48 standards will lead to problems.

Comments on Specific Regulation Sections

Section 3809.2 Scope. The proposed regulations substitute the word "public land" for what is labeled "federal land" in the existing regulations. We urge that the regulations retain the original use of "federal land" to avoid confusion. While the new definition of "public land" in Section 3809.5 indicates that state and private lands are excluded, if "public land" is used, we suggest this section reiterate this distinction to help prevent inappropriate interpretations.

Section 3809.5 Definitions — Casual Use. The definition of casual use should be revised to exclude suction dredges with an intake diameter of six inches or smaller. This revision would make management of suction dredging on federal lands in Alaska consistent with state law and regulation. Alaska frequently owns the shorelands beneath the rivers that flow through BLM land. In this case, neither the miner nor BLM may know whose authorities prevail, making it especially important that BLM and Alaska have similar requirements.

Alaska requires a suction dredge operating in a fish-bearing stream to have a permit from the Alaska Department of Fish and Game regardless of the size of the dredge or mineral property ownership. These permits contain standard seasonal restrictions to protect fish. The Alaska Department of Natural Resources (DNR) has determined that any suction dredge with intake diameter six inches or smaller is not a commercial operation subject to the Alaska mining law and regulation. Suction dredging operations using an intake diameter greater than six inches are required to get a standard permit issued on the basis of site specific operation. In addition to the state permits, the miner must also get a water quality discharge permit from EPA and Wetland Permits from the COE. Finally, in Alaska most suction dredging operations are in navigable waters and do not meet the definition of federal lands.

Our comment to classify less-than-six-inch dredges as casual use reflect recent scientific findings by the Department of Interior's U.S. Geological Survey (USGS) that suction dredging with an intake diameter greater than six inches created no water quality discharge exceeding standards. According to the USGS Fact Sheet (FS-154-97): "As seen in the chemical and turbidity data, any variations in water quality due to the suction dredging activity fall within the natural variations in water quality." These studies were for a 10-inch and 8-inch dredge on the Fortymile River.

Preliminary results being conducted under supervision of the EPA on the aquatic biology impacts have also failed to document significant impacts for the same suction dredging operations. For these reasons, we believe that regulation of suction dredging in Alaska is proper and appropriate. BLM should adopt the Alaska standard defining suction dredges with an intake diameter of six inches or smaller as recreational or hobby mining, or casual use. To do otherwise would create serious confusion among dredge operators, because most dredge operations are in navigable waterways that are claimed by the State. It will rarely be possible for BLM employees to enforce

a suction dredge restriction that is different from the states on a waterway even if surrounded by BLM lands.

Section 3809.5 Definitions — Recreation mining. The proposed 3809 regulation should define the term "recreation mining" or, better yet, delete it. The terms should be defined, if necessary, under BLM recreation management regulations rather than in the mining regulations.

Section 3809.11 Notice or plan of operations? The Forest Service alternative would essentially eliminate notice-level operations for placer mining. This will create a huge hardship on small placer miners in Alaska. By eliminating the notice-level permit, the proposed regulations require a full Plan of Operations for every mining and exploration project, regardless of size. This requirement places a particular burden on small placer mines and exploration projects that affect only small amounts of land. The small placer operators do not have the expertise or resources to comply with the paperwork requirements imposed by eliminating notice level operations. The increase in time and costs both for the miner/explorer and BLM will be greatly increased under proposed regulations with inconsequential environmental improvement in our view.

The Forest Service alternative, if adopted, should also be revised to allow suction dredging with an intake diameter of six inches or smaller. (See discussion under casual use, section 3809.5.)

In related discussion in the EIS, the authors display a lack of understanding of and sensitivity toward the Alaska placer mining industry. The 'Plan of Operation' requirement for virtually all operations will inordinately affect Alaska, which contains the majority of the nation's gold placer mines, and where most of the mines presently disturb less than 5 acres annually. Many of these operations are in remote areas, where they often represent the only wage-paying jobs for local people. To say that "...small rural communities are expected to lose only a small number of jobs relative to overall employment." (p 193) understates the fact that these jobs are among the few in rural areas that produce new wealth, rather than recycling tax dollars.

The EIS suggests "A Plan of Operation might be required for activity as slight as obtaining small surface samples with hand tools." (p 47). At the very least this is bound to increase the workload for the BLM beyond reason, negatively impacting both the agency and the applicant. Similarly, the statement that "All Plans of Operation proposing mining would require an economic feasibility study." (p 47) fails to consider that such Validity Examinations can take years or even decades to complete. Again, the applicants will be delayed and will frequently incur the high cost appeals.

BLM Alternative. We believe the following changes need to be made to the BLM alternative in order to make it workable for Alaska. As previously discussed, casual use should include suctions dredges with intake diameter of six inches or less. This would require changes in paragraphs (a) and (h) in the BLM alternative.

We also believe that paragraph (e) should be deleted. Recreational mining activities are either casual use, notice level or permit level. The addition of a specific requirement for recreational activities is confusing and does not add any apparent environmental protection.

Section 3809.100 Segregated or withdrawn lands. This section is unworkable for Alaska. It fails to account for the unique Alaska's land status situation. This section would prohibit mining on lands withdrawn from mineral appropriation until BLM prepares a mineral examination report. This prohibition may be appropriate in the lower 48 where lands are withdrawn from appropriation for specific environmental reasons. However, in Alaska, all lands selected by the State or Native corporations (that is most BLM lands in Alaska) are withdrawn from appropriation once the State or Native corporation have selected them. Frequently the State or Native corporations select lands specifically for their mineral value. If implemented as written, BLM would have to undertake mineral examination reports on almost all of the 14,000 federal mineral claims within Alaska. The time required to undertake this workload would effectively prohibit almost all mining on BLM lands in Alaska for decades. It would have the perverse effect of prohibiting mining that is been going on for generations on land selected by the State because of its mineral character. This inadvertent effect can be easily corrected by revising the proposed section so that it does not apply to areas withdrawn from appropriation of the mining laws either in Alaska, or in areas withdrawn due to State or Native land selections in Alaska.

Federal/State Agreements. It appears that Sections 201 through 204 propose a State primacy process for State assumption of BLM responsibilities within the state boundaries. We welcome this proposal and believe it has the potential to provide for less costly, more effective permitting and enforcement of hard rock mining on BLM lands. BLM, however, should reimburse the States for money it would otherwise spend on these tasks. It is a false promise to offer authority without the funding. In addition, we believe that Section 203 should be revised so that BLM need not concur with each and every State decision approving a plan of operations. It is much more efficient and appropriate for BLM to act as the Department of Interior, Office of Surface Mining does for coal mining primacy. OSM audits the State's implementation of the program to ensure the state programs are consistent with federal requirements. OSM does not, however, actively review each and every state decision. Certainly, in Alaska it would be inefficient for the State and the BLM each to review the many similar placer mining operations.

Section 3809.401(b)(2) Description Of Operations. Part of the list in this paragraph appears to overlap the jurisdiction of other state and federal agencies. These parts of the paragraph should be eliminated or clarified.

(iii) Water Management Plans. Within Alaska, discharges into surface and ground water are regulated by the EPA and Alaska DEC. Stormwater management is regulated by EPA. We are unclear what is asked of the operator under the water management requirement listed in this section. If it is only to provide information already required by EPA and DEC, then that should be clear. If this is a different and new requirement, we understand neither what is being required, how BLM would regulate it, nor how it will be coordinated with EPA and DEC.

(v) Quality Assurance Plans. The State typically requires quality assurance plans for some parts of large mining operations. We do not require them for everything, nor do we require them for any operation at most smaller mines. We do not know what is being requested here. Is it quality assurance plans for construction of buildings, liners, dams, ore assays, or water quality sampling? We believe that some of these are quite likely to be appropriate in some situations but are unclear what is requested here in general. As most quality assurance plans need not be reviewed by BLM (especially for small operations), this subparagraph should be eliminated.

(vi) Spill contingency plans. Spill contingency plans are required by the EPA and in some cases by Alaska DEC. We do not know what is requested here other than to meet the existing requirements of those agencies. If that is requested, it should be so stated and coordinated with the other agencies. If BLM is proposing something that is different than those requirements, we are concerned about duplicative agency jurisdiction. In any case, the requirement here should be made clear.

Section 3809.401(b)(3)(iv) Riparian Mitigation. Operations should avoid adverse effects on riparian habitat. However, many placer mining operations cannot avoid it. We are concerned that the word mitigation may be interpreted to require compensation for impact to riparian habitat. As previously stated, off-site compensation is not the preferred method of mitigation in Alaska. Therefore we suggest this section use another term. (See discussion of mitigation on page 2).

Section 3809.411 BLM Processing. We disagree with the emphasis that this section places on public review of the amount of the financial guarantee. While we do not oppose public review of bonding requirements along with other parts of the plan of operations, public scrutiny of the specific mechanics of the financial guarantee are no more helpful than for other areas of the mine permit.

Public comment is most helpful where the public has a specific value or concern, or can provide specific local knowledge. It is least helpful in review of engineering design. The financial guarantee should be a relatively straightforward calculation of engineering estimates required for topsoil re-spreading, etc. combined with standard engineering cost indices. On a major mine it appears that the public should be allowed to review this information; however, it does not deserve the emphasis placed in Section .411. By highlighting the reclamation bond in Subpart (a)(4)(vi) and in Subsection (d), the regulations invite an inappropriate public policy focus on what should be a technical calculation. We are not opposed to public review of financial guarantee for large projects, but see no reason to give it special emphasis.

Section 3809.420 (a)(4) Mitigation Without further direction, this paragraph gives BLM employees essentially unbridled authority to require offsite compensation for environmental impacts. See page 2 discussion on mitigation.

Section 3809.420 (b)(3) Wetlands and Riparian Areas. This section appears to eliminate almost all placer mining in Alaska. Its emphasis on mitigation and compensation for wetland riparian areas is inappropriate to the scale of impacts that mining is likely to create in Alaska. The existing COE regulation of wetlands impacts is adequate to protect their function. The performance standards in this section provide a duplicate and largely stricter standard that will be difficult or impossible to fulfill. Minor loss of wetlands associated with mining is generally not required to be compensated by the Corps. The requirements in this subsection would appear to require compensation or rebuilding wetlands which is generally not practical in Alaska. Finally the exhaustive list of riparian functions in paragraph (ii) means that it will not be possible to reclaim wetlands within a defined period of time. We believe that standard reclamation practices will return riparian areas to their full functioning. However, it may take many years before the full list of functions in this subsection can be confirmed. We therefore believe additional wetlands protection beyond that provided by the COE is unnecessary or duplicative, and should be removed from these proposed regulations.

Section 3809.420 (b)(5)(i)(A) Revegetation. Because of Alaska primacy over the coal program, the Alaska DNR's Division of Mining and Water Management has considerable experience in reviewing revegetation plans for their effect on diversity and density of vegetation. In general, duplicating the diversity and density at the site or the surrounding area is not necessarily desirable. The vegetation should be appropriate for the post mining land use which in Alaska is usually wildlife habitat. The revegetation should not detract from the diversity and density in the surrounding region, but focusing on recreating a preexisting natural vegetation pattern in many areas of Alaska is not desirable, even for fish and wildlife.

Section 3809.420 (c)(7) Reclamation. The discussion of Sub-paragraph (ii) concerning mitigation in the Federal Register notice is consistent with the language of the regulation. The discussion includes examples of mitigation measures such as safety fences or hazard signing. However the plain reading of the regulation gives BLM authority for acre for acre compensation. We believe that the requirement for compensation should be eliminated for Alaska. At the very least, further definition is necessary in this regulation if it is not to be abused.

Section 38.09.500 - .599 Financial Guarantee. The proposed regulations provide some useful improvements in the financial guarantee for large mines using hazardous chemicals. It is not necessary to apply these same requirements to placer mines. In addition, we have some specific concerns financial guarantee requirements. These are indicated in the paragraphs that follow.

Section 3809.503 Financial Guarantee for Notice Level Operations. We believe that the financial guarantee for notice level operations should be eliminated or established as a standard amount. It is not an effective use of BLM staff time or money to recalculate the financial guarantee for small placer operations. In addition, small placer operators are unlikely to have the expertise to provide the financial guarantee that is required by these regulations.

Section 3809.554 Estimating Reclamation Costs. In general, the cost to mobilize equipment to remote areas of the state could make the cost of third-party reclamation very high. BLM should have the discretion to assume, within a mining district, that equipment could be mobilized from adjacent mining operations.

Section 3809.570 State Approved Financial Guarantee. In general we are pleased that the State bond pool may continue to work as a means of allowing placer miners and others to easily comply with proposed regulations. In Alaska all operations disturbing 5 acres or more are required to be bonded for reclamation, and reclamation is required for all operations of any size. In past studies related to the creation of the bond pool, the cost of securing individual bonds has been shown to be prohibitive. The State of Alaska Bonding Pool has been used successfully for many years, and has been approved by the BLM for many operations. In fact, many operations of less than 5 acres have been the award recipients for excellent reclamation., illustrating great progress in Alaska in the last two decades.

We do, however, have two concerns with use of the State bond pool. Under this proposal BLM may recoup administrative costs associated with reclamation action after an operator has defaulted. Since the State generally saves BLM significant funds by administering the bond pool, we believe that BLM should not recoup administrative costs from the State bond pool. In addition, we recommend that the new rule contain provisions for states with bonding agreements with the BLM to have the ability to audit all reclamation costs claimed under a default situation, when monies are drawn from the existing state bond pool.

Also the proposed regulations need to direct BLM to proceed with legal action against any and all liable parties *before* using state bond pool money to remedy the reclamation obligation. We have had instances in the past where BLM wanted to use our state bond pool funds because it was easier than going after the offending operator.

Section 3809.600 BLM Inspections With The Public. This section gives BLM authority to authorize a member of the public to accompany a BLM inspector, but gives BLM no direction about when to do so. It is important to hold the public as well as the operator to some level of responsibility. It may be appropriate for the public to accompany an inspector after a specific public complaint, but it is not appropriate for the BLM to authorize a general fishing expedition by any member of the public. The regulation should provide criteria determining when it is appropriate for the public to accompany an inspector.

Comments on Appendix D. Summary of Alaska Regulations

BLM's analysis of Alaskan mining law has significant errors. The information below is an attempt to correct information in Appendix D of the EIS.

Planned Threshold and Submission Requirements. Appendix D indicates that Alaska's definition of project area does not include road and camp areas. Alaska is a public land state. Most mining operations are on public land. In these cases a permitting review, inspection and enforcement does include roads and camp areas.

Resource Protection Standards. The last sentence in this paragraph indicates that Alaska law has no special provisions that apply to consultation with Native American governments. Alaska Natives have a unique land ownership system involving a corporate structure and there are numerous mechanisms for consultation.

Enforcement, Shutdown and Bonding. The Alaska DNR's Division of Mining and Water Management has a staff of approximately 45, of which 25 are involved with mining. The staff includes approximately six non-coal inspectors. Placer mines are inspected approximately once per year though multiple inspections occur where problems are identified. Large hard rock mines are inspected six to eight times per year.

Significant Differences. The paragraph indicates that Alaska has no regulations that provide for the specific control of acid rock drainage and cyanide operations. This is misleading. Alaska's standards for surface and ground water quality provide end point performance standards that effectively control acid rock drainage and cyanide operations. Alaska is blessed with very little acid generating rock units and control mechanisms are worked out in individual cases.

Comments on Invited Areas

This section responds to the specific invitations for comment in the Federal Register notice.

Mitigation. When is compensation appropriate? We believe that offsite compensation is not the preferred method of mitigation in Alaska. See discussion on page 2 of this letter.

Suction Dredging, Adequacy of State Permit Requirements. See discussion under Section 3809.5 — Casual Use.

Forest Service Alternative. For discussion of the Forest Service notice alternative see previous comments at Section 3809.11.

Duplication of Effort Should BLM accept a written finding from the State approving a plan of operations that's consistent with the final 3809 regulations? Yes. It makes no sense for a State project team to spend days or in some cases months analyzing a project working with the operator, working with the public, and then have BLM duplicate the decision. For significant plans of operation such as large hard rock mines, a decision cannot be made without working through all the details. If the State is going to work through all the details, BLM should not and vice versa. For the State to do it and then BLM to redo it, wastes effort.

The Department of Interior, Office of Surface Mining, shows the potential effectiveness of Federal-State partnerships with respect to the Surface Mining Control Reclamation Act of 1977. We believe this model shows that periodic audit of State decisions is an effective method of ensuring compliance and that duplication of state effort is unnecessary.

Whether and to what extent should BLM obtain public comments on the financial guarantee amount be integrated into the -- process? The scope and extent of a financial guarantee should be addressed within the NEPA compliance process. This process provides ample time for public comment of the proposed project. A separate public comment period for financial guarantee is inappropriate. It highlights a question that is mostly technical. That is, the amount of the financial guarantee should be an engineering question that is answered with reference to a specific engineering cost indexes. This is a technical question and does not deserve individual comment process.

Whether and to what extent would the public be interested in commenting on proposed financial guarantee amounts? As indicated previously, we believe that a separate public comment period on the proposed financial guarantee is inappropriate. For those opposing a project it is a useful strategic location in which to stop a project by making doomsday predictions on which to base the financial guarantee.

Financial guarantee. Is a 30-day comment period too long or too short? We believe the comment period for financial guarantees should be integrated into the normal public comment period for the project. When public comment is required in most cases 30 days would be appropriate.

Is there any benefit to publication of financial guarantee amounts for small exploration operations? We feel very strongly that the answer to this question is no. The risk to public resources from small exploration projects are minimal. The amount of extra work to review public comment on guarantees for small exploration project is quite large. The separate public comment period for financial guarantees for exploration projects would be a large amount of work for no significant benefit. To avoid significant discussion of guarantees for small exploration projects we suggest that a standard bond be established. The amount of risk is not worth individual calculation for individual well holes.

Section 3809.552 Should BLM require additional funding mechanisms to meet operational or environmental contingencies? We feel strongly that the answer to this question is no. To bond for operational or environmental contingencies would allow BLM to create doomsday scenarios to put the financial guarantee out of reach of all but the largest companies. It is simply not possible for most companies to bond for environmental disaster.

3809.571 Corporate Guarantee. What would be an appropriate standard for an acceptable corporate guarantee? We recommend using the standards the Department of Interior uses for

the Surface Mining Control and Reclamation Act of 1977. These standards have a long working history and would increase consistency throughout the agency.

Thank you for the opportunity to provide these comments. If you have any questions or wish to discuss any of the issues contained herein, please call me at 907-269-7477; or Bob Loeffler, Director, DNR Division of Mining and Water Management at 907-269-8600.

Sincerely,

Sally Gibert
State CSU Coordinator

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