

With me are Mr. William Carter, executive director of the association, and Mr. Charles Bucy, from the law firm of Gall, Lane & Powell, counsel for the association. These gentlemen will be pleased to assist in answering any questions which you may have of us.

You have received copies of the association's formal statement of position. That statement sets forth in detail the reasons why National Crushed Stone Association, on behalf of its members and the industry, is opposed to these proposals.

This morning, I would like to discuss with you the two principal reasons why our association is opposed to these proposals. Briefly, those reasons are:

1. These proposals are ostensibly designed to carry out the recommendations developed by the Secretary of Interior's study concerning reclamation in the surface mining industry. However, as drafted, these proposals go far beyond the recommendations of the report and, indeed, the expressed intent of Congress in authorizing the study, by proposing nothing less than the detailed Federal regulation of every aspect of surface mining operations, whether related to reclamation in any way or not; and

2. These proposals ignore express congressional direction that any proposed reclamation requirements must take into consideration their cost impact upon the operators' competitive postures and could, if enacted, make it impossible for stone producers to be effective competitors.

Before discussing these principal reasons for NCSA's opposition to these proposals, we believe that it would be helpful to describe the respects in which stone quarries and their products are different from other types of surface mining operations.

An appreciation of those unique characteristics will, we believe, enable you to better understand not only why our operations are particularly best suited to local regulation but also why the reclamation requirements which these proposals would authorize are, as applied to quarries, both economically unrealistic and disastrous in their impact upon stone producers' competitive postures.

Unlike the more typical strip or surface mine which follows a relatively narrow seam or vein of mineral across the countryside, stone quarries are stationary and large quantities of stone are obtained within a very small area.

In many instances the only limitation upon the depth at which quarrying operations can be conducted is the cost involved in hauling the stone to the surface and, as a result, quarries normally remain in operation for extremely long periods of time.

Indeed, a recent survey conducted by NCSA disclosed that, on a nationwide basis, the average total operational life of the industry's current quarries is estimated to be 81 years with some quarries expected to continue in operation for as long as 250 years.

As a result of this unique characteristic, stone quarries disturb very little of the surface land in relation to the vast tonnages of useful stone which are removed.

Indicative of this fact is that, according to the Secretary's report, stone quarries have accounted for only 8 percent of the total land area which has been disturbed by surface mining operations.