

mines near Youngstown, or in Belmont and Harrison Counties, Ohio. Nor would highly restrictive measures seem appropriate to limestone areas near the surface in the Railbelt area of Alaska where an indigenous cement industry is now economically feasible and would be helpful in strengthening that state's economy. As a generalization, it would appear that any regulations that would flow from S. 3126 would be tailored to the economies of mineral extraction as balanced against the desired restoration and reclamation objectives of the bill.

Were ten cents a ton added to the price of coal for restoration purposes within any economic region of the nation for the task of restoration and reclamation, the impact in benefits would be in geometric proportion to the investment. This becomes a social cost shared by all and of benefit to all.

The only change of significance that I would recommend to S. 3126 would be to include within the purview of the legislation slag and waste dumps. The area immediately east of Deadwood, South Dakota, for example, is blighted by several hundred acres of slag from former gold mine operations and that land is at best of marginal utility. Without restoration, a similar situation obtains in the eastern Ohio and western Pennsylvania.

Finally, I should note that although both the Department of the Interior and the Department of Agriculture have overlapping interests in the matter of surface mining, I would suggest more technology and expertise as to reclamation and restoration is to be found in the Department of Agriculture than in the Department of the Interior, particularly in the U.S. Soil Conservation Service. I would therefore urge in the implementation of this legislation that the primary burden for restoration and reclamation standards and research and development be conducted by the Soil Conservation Service. However, the role of the Department of the Interior, particularly of its Bureau of Mines, certainly is an important one.

STATEMENT OF THE CONSERVATION FOUNDATION

The Conservation Foundation welcomes the opportunity to comment on the pending legislation dealing with surface mining regulation.

The environmental implications of surface mining are significant, and the Foundation believes that a national policy is necessary to ensure suitable environmental safeguards.

STATEMENT SUMMARY

In summary, we believe that—

1. The cooperative federal-state approach to regulation of all surface mining operations, as embodied in S. 3132 is basically sound;

2. Although limited to future mining, S. 3132 would constitute a good beginning, is administratively workable, and would provide an appropriate responsibility for the Secretary of the Interior;

3. S. 3132 would build upon, and support, the few strong state laws that already exist;

4. To help assure strong state standards and to protect future options, S. 3132 should be revised to prohibit any surface mining that would leave the surface less useful to man than it was before;

5. To stop further environmental damage from surface mining, S. 3132 should require regulation of surface mining as rapidly as possible; effective regulation should begin one year after passage of the act. Other vague time schedules in the bill should be clarified. Preliminary federal criteria for the states are unnecessary and would delay the program; and

6. In addition to regulation of future mining operations, S. 3126 also offers an opportunity for the Congress at least to begin to develop a reclamation program for the millions of acres of land already altered by surface mining. A demonstration surface mine reclamation program should be authorized, enabling the states to conduct, with federal financial and technical assistance, a series of demonstration projects in cooperation with local governments on ways to put this derelict land to work to serve a variety of public needs. In addition, a Presidential task force should be authorized to recommend within one year a comprehensive long-term program for reclamation integrated with other programs including recreation, solid waste disposal and employment.

Our detailed comments follow.