

## Rian Skov

Thank you for taking my comments on the sand and gravel general permit. I work in the Surface Mine Reclamation program with the Washington Geological Survey. After reviewing the document in detail, I have the following comments:

Document page 71, In the Definitions section, the definition of reclamation references a DNR reclamation plan, the term "reclamation" is already defined in RCW 78.44.031. perhaps citing the RCW rather than a reclamation plan, (which is a part of a reclamation permit) would be more appropriate.

Soap, in section F.2, and G.3 state that all soap impacts waters cannot be discharged to waters of the state, in definitions (doc p 73) the definition of soap states that only non biodegradable.... Soams cannot be discharged to waters of the state. This is confusing and potentials misleading, needs clarification.

In Section E1: "A mining site that has a Department of Natural Resources (DNR) reclamation permit is considered restored when the DNR reclamation permit has been terminated, or DNR has determined that the reclamation minimum standards have been achieved, or the site has been reclaimed and final stabilization to the satisfaction of the Ecology permit manager and, if required, local jurisdiction." The paragraph sounds like Ecology can determine when a surface mine is reclaimed. Per RCW 78.44 DNR has sole authority over reclamation. To eliminate confusion, changing the second "or" to "and" then preserves DNR as the authority over reclamation fixes the issue.

In reviewing the NOI forms, the electronic form appears to be different from the paper form, these should match.

With regard to critical aquifer recharge areas (CARA), the sections (A2, B.4) about discharge to groundwater has special requirements for sites in CARAs. The issue here is that CARAs are not mapped to the same level for every county and it may be difficult for sites to determine if they are in a CARA or not. Not sure if this would be enforceable statewide.