



OFFICE OF SURFACE MINING RECLAMATION AND ENFORCEMENT

Annual Evaluation Report

for the

Regulatory and Abandoned Mine Land Reclamation Programs

Administered by the State

of

Arkansas

for

Evaluation Year 2000

(October 1, 1999 through September 30, 2000)

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I. Introduction

The Surface Mining Control and Reclamation Act of 1977 created the Office of Surface Mining Reclamation and Enforcement in the Department of the Interior. SMCRA provides authority to OSM to oversee the implementation of and provide Federal funding for State regulatory programs that have been approved by OSM as meeting the minimum standards specified by SMCRA. This report contains summary information regarding the Arkansas program and the effectiveness of the Arkansas program in meeting the applicable purposes of SMCRA as specified in Section 102. The evaluation period covered by this report is October 1, 1999 to September 30, 2000.

OSM continued to implement the oversight policy initiated in the 1996 evaluation year. The primary focus of the policy is an on-the-ground results-oriented strategy that evaluates the end result of State program implementation, i.e., the success of the State programs in ensuring that areas off the minesite are protected from impacts during mining, and that areas on the minesite are contemporaneously and successfully reclaimed after mining activities are completed. The policy emphasizes a shared commitment between OSM and the States to ensure the success of SMCRA through the development and implementation of a performance agreement. Also, the policy continued to encourage public participation as part of the revised oversight strategy. Besides the primary focus of evaluating end results, the oversight guidance makes clear OSM's responsibility to conduct inspections to monitor the State's effectiveness in ensuring compliance with SMCRA's environmental protection standards.

Oversight is a continuous and ongoing process. To further the idea of continuous oversight, this annual report is structured to report on OSM's and Arkansas' progress in conducting evaluations and completing oversight activities. It also reports accomplishments during the evaluation period. Detailed background information and comprehensive reports for the program elements evaluated during the period are available for review and copying at the Office of Surface Mining, Tulsa Field Office, 5100 E. Skelly Drive, Suite 470, Tulsa, Oklahoma 74135-6547.

The following acronyms are used in this report:

ABA	Acid Base Accounting
ADEQ	Arkansas Department Environmental Quality
AMD	Acid Mine Drainage
AML	Abandoned Mine Land
AMLR	Abandoned Mine Land Reclamation
CFR	Code of Federal Regulations
EY	Evaluation Year
MCRCC	Mid-Continent Regional Coordinating Center
NOV	Notice of Violation
OSM	Office of Surface Mining

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PA	Performance Agreement
SMCRA	Surface Mining Control and Reclamation Act of 1977
SMRD	Surface Mine Reclamation Division
SOAP	Small Operators Assistance Program
TFO	Tulsa Field Office

Randall Mathis, Director of the Arkansas Department of Environmental Quality, retired at the end of the evaluation period. Richard Weiss was named Interim Director to lead ADEQ into EY 2001. The Chief of ADEQ's Surface Mining and Reclamation Division, Floyd Durham, announced his plans to retire from State service effective November 30, 2000.

II. Overview of Coal Mining Industry

Arkansas has reserves of bituminous, semianthracite, and lignite coal. The original bituminous and semianthracite coal reserves were estimated at approximately 2.2 billion tons, half of which is recoverable. Prior to the 1950's, much of the coal was mined by underground mining methods. Since then, most Arkansas coal has been mined by area surface mining methods. Remining, especially surface mining methods to remove coal left in pillars in old underground mines and removing coal from old coal mine waste piles, has been common. Lignite, potentially a major energy resource in Arkansas, was mined in southern Arkansas before the Civil War and used as a fuel by local industries. The Arkansas lignite deposits are estimated as high as 9 billion tons. In 1988, an exploratory operation confirmed that Arkansas lignite could be used in the State's coal-fired energy plants. As yet, the lignite field has not been developed. In 1999, the 4 coal-producing operations in the State produced approximately 34,140 tons of bituminous coal using conventional surface mining methods. Permitted acreage was 1,369 acres. In 2000, Arkansas had 4 producing operations and a total permitted acreage of 1,454. Because coal operations in Arkansas are small and the demand for coal unsteady, the industry employs fewer than 25 on a daily basis.

III. Overview of Public Participation in the Program

The State allows public participation in a number of ways including commenting on permit and major revision applications and State rule making. The public can also participate in the informal and formal review process of many State decisions related to permitting and inspection and enforcement matters. The public can further participate in the State inspection and enforcement process through bond releases and citizen's request for inspections. Each public notice of an Abandoned Mine Land project includes an invitation for members of the public to provide input on the need for the proposed project, how the proposed project should be carried out, what the post reclamation use of the project should be, and suggestions of other possible coal-related reclamation sites in Arkansas.

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In an effort to stimulate public participation and promote public awareness, OSM has Citizen Information Cards for OSM and the State to handout to citizens when staff make field contacts with members of the public. OSM also mailed letters requesting comments and suggestions on oversight to entities that have expressed an interest in the Arkansas program.

IV. Accomplishments/Issues in the Arkansas Program

A. Regulatory Program

Arkansas issued its first Small Operators Assistance Program permit. The permit overpermitted and will re-affect part of an unreclaimed bond forfeiture site.

During the Evaluation Year 1998, the State submitted a formal program amendment (AR-030-FOR). The amendment was in response to a 30 CFR 732 letter. AR-030-FOR addressed revisions in the State's definition of siltation structures, requirements for maps and plans, changed references to the Soil Conservation Service to that agency's new name Natural Resources Conservation Service, postmining rehabilitation of sedimentation ponds, diversions, impoundments, and treatment facilities, disposal of excess spoil, backfilling and grading requirements, prime farmland, and operations on steep slopes. OSM approved the revision to the Arkansas rules in EY 1999. At the close of EY 2000 the State had not completed its promulgation of the revised rules.

On a National level OSM recognized numerous long standing issues regarding required revisions to approved State programs. Performance Agreements for the period starting October 1, 2000, include an OSM emphasis on completing required rule revisions included in previous 30 CFR 732 and 884 letters to the States. The Arkansas PA covers outstanding required State program amendments addressing three subjects; revegetation success standards included in a November 1985 and an October 1997, 30 CFR 732 letters, valid existing rights included in an August 2000, 30 CFR 732 letter, and changes to the State's approved AML rules included in a September 1994, 30 CFR 884 letter.

ADEQ made additional progress in the reclamation of old bond forfeiture sites using collected bond funds. During the first half of the evaluation period, reclamation of one site was essentially completed. Pending availability of additional funds, two other old forfeited sites await completion of reclamation activities. During EY 2000 an additional site was forfeited and the bond collected. However, the reclamation plan was not completed at the end of the evaluation period.

Due to concerns raised on a national level, OSM provided technical assistance to the State in the area of permit review findings.

OSM anticipates ADEQ's successful implementation of its approved program throughout EY 2001.

B. Abandoned Mine Land Reclamation Program

ADEQ is the agency designated by the State to administer the Abandoned Mine Land Reclamation Program. It operated in EY 2000, with a grant of \$1.515 million and 6.65 staff members. Project selection has been based on a system that considers protection of the public health, safety and general welfare, and property from extreme danger of adverse affects of past coal mining practices. ADEQ solicited citizen input for projects selected for construction. Priority selection complied with Section 403 of SMCRA. Late in the evaluation period the State changed the way it will handle Storm Water Discharge Permits for AML projects. In the past SMRD acquired the Storm Water Discharge Permits but for future projects, the contractor will be responsible for obtaining the permit.

In response to a 30 CFR 884.15(d) letter dated September 26, 1994, Arkansas submitted a formal program amendment (AR-029-FOR) proposing numerous revisions to its approved State Reclamation Plan. OSM approved AR-029-FOR during the closing days of EY 1999. As of the close of EY 2000, Arkansas had not completed its promulgation process.

Most planning and design was done with in-house staff. Projects selected for construction met eligibility requirements under the approved AML program. The majority of health and safety features on approved projects were open strip pits with dangerous high walls and associated water impoundments that were located near the general public. Pits were filled in with mine spoil and the high walls reclaimed to eliminate the hazard. Some water-filled pits were partially filled with spoil and inslopes reshaped to form lakes with gentle slopes leading to shallow water around the edges of impoundments. ADEQ involved the general public and local citizens in project selection before construction was initiated.

ADEQ followed standard construction practices using State approved contracting procedures. Inspection of projects indicated ADEQ completed projects with no significant problems. Six regular AML projects were completed, one of which was a joint project with the Natural Resource Conservation Service. The completed projects represented a total of 309 acres reclaimed including, 4,300 linear feet of highwall, 2 hazardous water bodies, 23 vertical openings and 4 portals closed, 143 acres of dangerous piles and embankments, and 8 acres of spoil banks. No AML emergencies

were declared in EY 2000. Since program approval, ADEQ has reclaimed 2,900 acres of abandoned mine land.

V. Success in Achieving the Purposes of SMCRA as Measured by the Number of Observed Off-Site Impacts and the Number of Acres Meeting the Performance Standards at the Time of Bond Release

To further the concept of reporting end results, the findings from performance standards and public participation evaluations are being collected for a national perspective in terms of the number and extent of observed off-site impacts and the number of acres that have been mined and reclaimed, which meet the bond release requirements for the various phases of reclamation and the effectiveness of customer service provided by the State. Individual topic reports are available in the Tulsa Field Office that provide additional details on how the following evaluations and measurements were conducted.

A. Off-Site Impacts

Arkansas did not generate off-site impact forms for this year's evaluation period. Using State and Federal inspection reports, one off-site impact was observed from 150 opportunities for observations. This is down from 2 off-site impacts observed for the previous year and 7 off-site impacts observed in EY 1998. An observation is defined as an inspection, either State or Federal, partial or complete. When a Federal observation leads to a State observation, the observation is counted only once; no bond forfeiture sites were included; and all observations were those that resulted in an Notice of Violation. The off-site impact identified for this evaluation period was an impact to hydrology with moderate impact. Off-site impacts from coal mining and reclamation in Arkansas continued to be minimal in EY 2000.

B. Reclamation Success

OSM is evaluating reclamation success by comparing the number of acres released in comparison with acres disturbed. At the end of EY 1999, Arkansas had 1,112 disturbed acres. During EY 2000, 5 acres received a Phase III release with 7.4 acres of new disturbance occurring. Two Phase II and one Phase III bond release applications were approved during the evaluation period. (See Table 5, Appendix A).

C. Customer Service

Customer service topics for this year's review included handling of citizen's complaints and bond releases. As in the last several years, there were no citizen's complaints, therefore, no activity to review.

During EY 2000, OSM reviewed the State's actions on three bond release requests. These bond release requests, two for Phase II and one for Phase III, were received by ADEQ during the previous evaluation period. The State's final determination on each request was made during the current evaluation. The operator on one site contested ADEQ's initial decision to deny its request for bond release. After an onsite hearing, ADEQ reversed its decision. All three bond release requests were approved. In some cases, proper notification of ADEQ's Director's decision to approve the release applications were not always given to all entities required to receive notice under the State's approved program. The State revised its procedures to insure notification of its Director's decision to approve bond release applications. The landowners did not actively participate in these released during EY 2000.

VI. OSM Assistance

As part of OSM's ongoing national emphasis on Acid Mine Drainage, OSM continued assisting the State in implementing the AMD plan previously developed by a joint ADEQ/OSM team. The AMD plan has the dual goals of preventing AMD from future coal extraction and the cleanup of AMD impacts from previous coal mining activities. During EY 2000, OSM assisted the State in implementing its AMD plan principally by providing technical assistance with computer based overburden analysis on a permit application that proposed to reprocess coarse refuse and surface mine coal located under the coarse refuse dump. OSM also provided ADEQ with recent scientific literature on Acid Base Accounting techniques, calculating neutralization potentials, and neutralizing acid-producing materials. During the next evaluation period, OSM will continue to provide technical assistance to the State as plans are developed for the mitigation of potential impacts from AMD and as possible changes in ADEQ's permitting procedures are made to prevent future AMD.

In addition to Technical Information Processing System training, OSM provided ADEQ with training in Acid-Forming Materials, wetland evaluation technics, AML project design with emphasis on dangerous highwalls, and the Abandoned Mine Land Information System. OSM provided one half of ADEQ's administrative and enforcement budget for its approved regulatory program. OSM provided 100 percent funding for ADEQ's AMLR program (See Table 9, Appendix A).

VII. General Oversight Topic Reviews

OSM intends the oversight reviews and reports be used as a basis for continuing joint efforts in assisting the State in meeting its regulatory responsibilities. Detailed background information and comprehensive reports for the program elements evaluated during the period are available for review and copying at the Office of Surface Mining, Tulsa Field Office, 5100 E. Skelly Drive, Suite 470, Tulsa, Oklahoma 74135-6547.

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Mine-Site Evaluation: During EY 2000, TFO conducted 9 complete inspections on Arkansas mines. All inspections were conducted jointly with ADEQ. One Ten-Day Notice was issued. The State took appropriate action in the form of issuance of a State enforcement action. The Federal NOV and resulting Failure-To-Abate Cessation Order issued during a previous evaluation period were still outstanding at the close of the evaluation year.

Bond Forfeiture Reclamation: The review was completed by a joint ADEQ/OSM team. The team determined the State was making progress in implementing the team's previous recommendations. Reclamation is complete for one of the sites with termination of jurisdiction the only step remaining. Reclamation was essentially completed on a coal preparation plant during the first half of the evaluation period. Forfeiture funds for the two sites remaining from the original list are inadequate to conduct any meaningful reclamation at this time. An additional site was forfeited and collected during the evaluation period. Adequacy of funds to reclaim the site will not be known until a reclamation plan is finalized.

Acid Mine Drainage: The AMD project is being addressed by a joint ADEQ/OSM AMD Team that was formed in 1997 due to an OSM National emphasis on repairing the impacts of past and current AMD and prevention of future occurrences. As recommended by the Team, a SOAP grant was used to increase the quantity and quality of geo-hydrologic background data for a new permit that over permitted a bond forfeiture coarse refuse area with a long history of generating AMD. The site not only contains significant amounts of coal refuse on the surface but partially overlays prelaw underground coal workings. The Team requested and received technical assistance from OSM's Mid-Continent Regional Coordinating Center in evaluating the permit's proposed mine plan relative to Acid and Toxic-Forming Materials Handling Plan and using computer programs to perform ABA and neutralization potential calculations. MCRCC also supplied the Team with recent literature on ABA techniques, calculating neutralization potentials, and neutralizing-acid producing materials with additions of alkaline materials. At the close of the evaluation period the AMD Team was awaiting the opportunity to review the report on bonding for postmine AMD prepared for OSM by Tetra Tech and to work with MCRCC for the development of plans for performing an AMD inventory.

Bond Adjustments for Postmine AMD: Bond adjustments for postmine AMD is an OSM national emphasis of concern that closely parallels work the AMD Team planned under its AMD initiative. Since the existing ADEQ/OSM AMD Team planned on addressing similar issues it assumed the task of looking at the potential need for bond adjustments for sites that generate AMD after the completion of coal extraction. During the previous evaluation period, the AMD Team identified a small number of sites in Arkansas for additional study. Additional work was temporarily put on hold while the AMD Team awaits the release of an OSM contracted report addressing the subject on a national basis.

Reclamation of Abandoned Sites: The PA directs the review to emphasize exploring and implementing options within the State's approved program to complete reclamation of sites

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mined in the 1980's and release old permits that meet applicable bond release requirements. Little progress was made during the evaluation period due to problems scheduling technical assistance from the Federal Solicitor s Office. A meeting with ADEQ, OSM, and Federal Solicitor s Office to explore legal options is scheduled for November of 2000.

Appendix A: Tabular Summaries of Data

These tables present data pertinent to mining operations and State and Federal regulatory activities within Arkansas. They also summarize funding provided by OSM and Arkansas staffing. Unless otherwise specified, the reporting period for the data contained in all tables is October 1, 1998 to September 30, 1999. Additional data used by OSM in its evaluation of Arkansas' performance is available for review in the evaluation files maintained by TFO.

TABLE 1

COAL PRODUCTION (Millions of short tons)			
Period	Surface mines	Underground mines	Total
Coal production^A for entire State:			
Calendar Year			
1997	.019	0	.019
1998	.035	0	.035
1999	.034	0	.034

^A Coal production as reported in this table is the gross tonnage which includes coal that is sold, used or transferred as reported to OSM by each mining company on form OSM-1 line 8(a). Gross tonnage does not provide for a moisture reduction. OSM verifies tonnage reported through routine auditing of mining companies. This production may vary from that reported by States or other sources due to varying methods of determining and reporting coal production.

TABLE 3

STATE PERMITTING ACTIVITY (As of September 30, 2000)												
Type of application	Surface mines			Underground mines			Other facilities			Totals		
	App. Rec.	Issued	Acres	App. Rec.	Issued	Acres ^A	App. Rec.	Issued	Acres	App. Rec.	Issued	Acres
New permits	1	1	90	0	0	0	0	0	0	1	1	90
Renewals	1	1	17	0	0	0	0	0	0	1	1	17
Incidental boundary revisions	0	0	0	0	0	0	0	0	0	0	0	0
Revisions (exclusive of incidental boundary revisions)	0	0		0	0		0	0		0	0	
Transfers, sales and assignments of permit rights	0	0		0	0		0	0		0	0	
Small operator assistance	0	0		0	0		0	0		0	0	
Exploration permits	0	0		0	0		0	0		0	0	
Exploration notices ^B	0	1		0	0		0	0		0	1	
Totals	2	3	107	0	0	0	0	0	0	2	3	107

OPTIONAL - Number of midterm permit reviews completed that are not reported as revisions 1

^A Includes only the number of acres of proposed surface disturbance.

^B State approval not required. Involves removal of less than 250 tons of coal and does not affect lands designated unsuitable for mining.

TABLE 4

OFF-SITE IMPACTS													
RESOURCES AFFECTED		People			Land			Water			Structures		
DEGREE OF IMPACT		minor	moderate	major	minor	moderate	major	minor	moderate	major	minor	moderate	major
TYPE OF IMPACT AND TOTAL NUMBER OF EACH TYPE	Blasting												
	Land Stability												
	Hydrology	1							1				
	Encroachment												
	Other												
	Total	1	0	0	0		0	0	0	1	0	0	0
OFF-SITE IMPACTS ON BOND FORFEITURE SITES													
RESOURCES AFFECTED		People			Land			Water			Structures		
DEGREE OF IMPACT		minor	moderate	major	minor	moderate	major	minor	moderate	major	minor	moderate	major
TYPE OF IMPACT AND TOTAL NUMBER OF EACH TYPE	Blasting												
	Land Stability												
	Hydrology												
	Encroachment												
	Other												
	Total	0	0	0	0	0	0	0	0	0	0	0	0

The objective of this Table is to report all off-site impacts identified in a State regardless of the source of the information. Report the degree of impact under each resource that was affected by each type of impact. Refer to guidelines in Directive REG-8 for determining degree of impact. More than one resource may be affected by each type of impact. Therefore, the total number of impacts will likely be less than the total number of resources affected; i.e., the numbers under the resources columns will not necessarily add horizontally to equal the total number for each type of impact. As provided by the Table, report impacts identified on bond forfeiture sites separately from impacts identified on other sites. If bond forfeitures sites were not evaluated during the period, clearly note the table to indicate that fact. Impacts related to mine subsidence or other areas where impacts are not prohibited are not included in this table. **Refer to report narrative for complete explanation and evaluation of the information provided by this table.**

TABLE 5

ANNUAL STATE MINING AND RECLAMATION RESULTS		
Bond release phase	Applicable performance standard	Acreage released during this evaluation period
Phase I	"Approximate original contour restored "Topsoil or approved alternative replaced	0.00
Phase II	'Surface stability 'Establishment of vegetation	89.00
Phase III	'Post-mining land use/productivity restored 'Successful permanent vegetation 'Groundwater recharge, quality and quantity restored 'Surface water quality and quantity restored	5.00
	Bonded Acreage Status^A	Acres
	Total number of bonded acres at end of last review period (September 30, 1999) ^B	532.11
	Total number of acres bonded during this evaluation year	89.56
	Number of acres bonded during this evaluation year that are considered re-mining, if available	0.00
	Number of acres where bond was forfeited during this evaluation year (also report this acreage on Table 7).	46.28
<p>^A Bonded acreage is considered to approximate and represent the number of acres disturbed by surface coal mining and reclamation operations.</p> <p>^B Bonded acres in this category are those that have not received a Phase III or other final bond release (State maintains jurisdiction). Arkansas does not include acres forfeited and collected in this category.</p>		

TABLE 6

STATE BOND FORFEITURE ACTIVITY (Permanent Program Permits)			
	Sites	Dollars	Acres
Bonds forfeited as of September 30, 1999	3	\$73,357	204
Bonds forfeited during EY 00	1	\$44,467	0
Forfeited bonds collected as September 30, 1999	3	\$73,357	204
Forfeited bonds collected during EY 2000	1	\$44,467	46
Forfeiture sites reclaimed during EY 2000	1	\$519,009	25
Forfeiture sites repermitted during EY 2000	1	\$0	75
Forfeiture sites unreclaimed as of September 30, 2000	4	\$67,923	163
Excess reclamation costs recovered from permittee	0	\$0	
Excess forfeiture proceeds returned to permittee	0	\$0	
<p>^A Includes data only for those forfeiture sites not fully reclaimed as of this date.</p> <p>^B Cost of reclamation, excluding general administrative expenses.</p>			

TABLE 7

ARKANSAS STAFFING (Full-time equivalents at end of evaluation year)	
Function	EY 2000
Regulatory program	
Permit review	0.65
Inspection	2.20
Other (administrative, fiscal, personnel, etc.)	2.25
Sub-total	5.10
AML Program	6.65
TOTAL	11.75

TABLE 8

FUNDS GRANTED TO ARKANSAS BY OSM			
Type of grant		Federal funds awarded	Federal funding as a percentage of total program costs
Regulatory	Administration and enforcement	\$142,713.00	50%
	Small operator assistance	\$25,000.00	100%
Regulatory Totals		\$167,713.00	
AMLR	Administration and construction	\$1,515,000.00	100%
AMLR Total		\$1,515,000.00	
Total Regulatory and AMLR		\$1,682,713.00	

TABLE 9

ABANDONED MINE LAND RECLAMATION NEEDS AND ACCOMPLISHMENTS SINCE PROGRAM APPROVAL							
Problem nature	Unit	Coal-related problems				Noncoal-related problems	
		Abatement status			Total	Abatement status	
		Unfunded	Funded	Completed		Funded	Completed
Priority 1 & 2 (Protection of public health, safety, and general welfare)							
Clogged streams	Miles	1		.5	1.5		
Clogged stream lands	Acres						
Dangerous highwalls	Lin Feet	72,655	1,000	52,826	126,481		
Dangerous impoundments	Count			1	1		
Dangerous piles and	Acres	119		751	870		
Dangerous slides	Acres						
Gases: hazardous/explosive	County						
Underground mine fires	Acres						
Hazardous equip. & facilities	Count	4		2	6		
Hazardous water bodies	Count	37	6	58	101		
Industrial/residential waste	Acres	7		20	27		
Portals	Count	10		21	31		
Polluted water: agric. & indust.	Count						
Polluted water: human	Count						
Subsidence	Acres	5	2	7	14		
Surface burning	Acres			4	4		
Vertical opening	Count	7	1	87	95		
Priority 3 (Environmental restoration)							
Spoil areas	Acres	1,592		8	1,600		
Benches	Acres						
Pits	Acres	117			117		
Gob piles	Acres	31			31		
Slurry ponds	Acres						
Haul roads	Acres						
Mine openings	Count	9			9		
Slumps	Acres	11			11		
Highwalls	Lin Feet	4,000			4,000		
Equipment/facilities	Count	1			1		
Industrial/residential waste	Acres	1			1		
Water problems	Gal/min	20			20		
Other							

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