

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

Division of Mining, Land and Water

Northern Region Land Office
3700 Airport Way
Fairbanks, AK 99709-4699
(907) 451-2740
nro.lands@alaska.gov

Southcentral Region Land Office
550 West 7th Ave, Suite 900C
Anchorage, AK 99501-3577
(907) 269-8503
dnr-pic@alaska.gov

Southeast Region Land Office
P. O. Box 111020
Juneau, AK 99811-1020
(907) 465-3400
sero@alaska.gov

Statewide TTY – 771 for Alaska Relay or 1-800-770-8973

MATERIAL SALE APPLICATION

AS 38.05.550-565; AS 38.05.810(a)

ADL # _____

Applicant's Name: DOT & PF Doing business as: _____

Mailing address: 2301 Peger Road Email address: kahlil.wilson@alaska.gov

City/State/Zip: Fairbanks, AK 99709

Message Phone: 907 451-5425 Work Phone: 907 451-5425 Fax: _____

Location of material site Designated material site ADL # 231519 ADOT/PF MS# 809-010-5 Other ☐

Legal description: See attached site drawing

Meridian Copper River Township 16S, Range 2E, Section 30 & 31 1/4 1/4

Municipality _____ Approximate size of the material site in acres _____

Applicant is at least 18 years old: ☐ Yes ☐ No

Quantity of material desired (cubic yards): 150,000

Length of time requested for removal: 5 Years

When is the extraction operation proposed to begin? Summer 2026 End? Fall 2031

For what purpose will the material be used? Maintenance and construction of public roads

Are there any existing permits, leases or authorizations covering any part of the application site: ☐ Yes ☒ No.

If yes, state name and last known address of ☐ lessee ☐ permittee ☐ authorized user:

_____ Name	_____ Message phone	_____ Work phone
_____ Address	_____ City	_____ State
		_____ Zip

Describe the proposed method of excavation, including the type of equipment to be used:
Material will be excavated by dozer/scrapper or excavator depending on the specific project.

ADL # _____

Describe the type of material to be extracted (e.g., coarse, un-sized angular rocks; well-sorted and sized gravel; sand and gravel mixed with some shale; class of rip rap; ballast).

Well-sorted and sized gravel: sand and gravel mix

How many cubic yards do you propose to extract per month? _____ per year? as needed

Is material site area located within or immediately adjacent to a waterbody? ☐ Yes ☒ No.

Note: If extraction will occur on state submerged land, shoreland, or tideland you **must** fill out and sign a "Material Sales Supplemental Questionnaire for State Submerged Land, Shoreland, or Tideland Activities." The completed supplemental questionnaire will become part of your application.

Is your mining operation contemplating the use of explosives or blasting? ☐ Yes ☒ No.

Note: If extraction will involve use of explosives, you **must** fill out and sign a "Material Sales Supplemental Questionnaire for use of Explosives." The completed supplemental questionnaire will become part of your application.

If permits are required by other agencies, have they been applied for? ☐ Yes ☐ No.



Applicant's Signature

8/21/2025

Date

NOTICE: If the proposed material sale is intended to be used for commercial purposes, please include a copy of your business license authorizing you to do business in the State of Alaska. This application will not be considered complete unless accompanied by a sketch map sufficiently detailed to enable the Division of Mining, Land and Water to locate the application site. If the Division of Mining, Land and Water considers it necessary, the applicant may be required to submit a more detailed map or survey plat.

In submitting this form, the applicant certifies that he or she has not changed the original text of the form or any attached documents provided by the Division.

NOTICE: AS 38.05.035(a) authorizes the director to decide what information is needed to process an application for the sale or use of state land and resources. This information is made a part of the state public land records and becomes public information under AS 40.25.110 and 40.25.120, unless the information qualifies for confidentiality under AS 38.05.035(a)(8) and confidentiality is requested, or qualifies for confidentiality AS 43.05.230, AS 45.48, or other state or federal laws. Public information is open to inspection by you or any member of the public. A person who is the subject of the personal information may challenge its accuracy or completeness under AS 40.25.310, by giving a written description of the challenged information, the changes needed to correct it, and a name and address where the person can be reached. False statements made in an application for a benefit are punishable under AS 11.56.210. In submitting this form, the applicant agrees with the Department to use "electronic" means to conduct "transactions" (as those terms are used in the Uniform Electronic Transactions Act, AS 09.80.010 – AS 09.80.195) that relate to this form and that the Department need not retain the original paper form of this record: the Department may retain this record as an electronic record and destroy the original.

For Department Use Only
Application received date stamp

Receipt Types:

- ☐ 17 Application for sale of material, except
- ☐ A1 Application for sale of peat from other than a designated material site or source

A non-refundable filing fee may be required to complete application submittal: See current Director's Fee Order for applicable fees.

ADL # _____

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

Division of Mining, Land and Water

Land Conveyance Section
550 W. 7th Ave, Suite 640
Anchorage, AK 99501-3576
(907) 269-8594

Northern Region
3700 Airport Way
Fairbanks, AK 99709-4699
(907) 451-2740
nro.lands@alaska.gov

Southcentral Region
550 W. 7th Ave, Suite 900C
Anchorage, AK 99501-3577
(907) 269-8503
dnr.pic@alaska.gov

Southeast Region
P. O. Box 111020
Juneau, AK 99811-1020
(907) 465-3400
sero@alaska.gov

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APPLICANT ENVIRONMENTAL RISK QUESTIONNAIRE

The purpose of this questionnaire is to help clarify the types of activities you propose to undertake. The questions are meant to help identify the level of environmental risk that may be associated with the proposed activity. The Division of Mining, Land and Water's evaluation of environmental risk for the proposed activity does not imply that the parcel or the proposed activity is an environmental risk from the presence or use of hazardous substances.

Through this analysis, you may become aware of environmental risks that you did not know about. If so, you may want to consult with an environmental engineer or an attorney.

Dept. Of Transportation and Public Facilities

Applicant's Name		Doing Business As	
2301 Perger Rd		Fairbanks	AK 99709
Address		City	State Zip
(907) 451-5425	()	kahlil.wilson@alaska.gov	Kahlil Wilson
Message Phone	Work Phone	Email	Contact Person

Describe the proposed activity:

Continued Development of an exisiting material site using standard construction equipment

In the course of your proposed activity will you generate, use, store, transport, dispose of, or otherwise come in contact with toxic and/or hazardous materials, and/or hydrocarbons? ☒ Yes ☐ No. If yes, please list the substances and the associated quantities. Use a separate sheet of paper, if necessary.

Approximately 25 gallons of diesel and no more than 10 gallons of lubrication fluids are required to run construction equipment for excavation and hauling.

If the proposed activities involve any storage tanks, either above or below ground, address the following questions for each tank. Please use a separate sheet of paper, if necessary, and, where appropriate, include maps or plats:

- a. Where will the tank be located?
- b. What will be stored in the tank?
- c. What will be the tank's size in gallons? _____
- d. What will the tank be used for? (Commercial or residential purposes?)
- e. Will the tank be tested for leaks? _____
- f. Will the tank be equipped with leak detection devices? ☐ Yes ☐ No. If yes, describe:

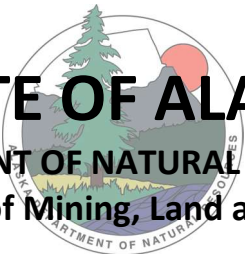
Do you know or have any reason to suspect that the site may have been previously contaminated? ☐ Yes ☒ No.
If yes, please explain:

I certify that due diligence has been exercised and proper inquiries made in completing this questionnaire, and that the foregoing is true and correct to the best of my knowledge.

Applicant Signature: Buck Robert Date: 8/21/2025

AS 38.05.035(a) authorizes the director to decide what information is needed to process an application for the sale or use of state land and resources. This information is made a part of the state public land records and becomes public information under AS 40.25.110 and 40.25.120 (unless the information qualifies for confidentiality under AS 38.05.035(a)(9) and confidentiality is requested). Public information is open to inspection by you or any member of the public. A person who is the subject of the information may challenge its accuracy or completeness under AS 44.99.310, by giving a written description of the challenged information, the changes needed to correct it, and a name and address where the person can be reached. False statements made in an application for a benefit are punishable under AS 11.56.210. In submitting this form, the applicant certifies that he or she has not changed the original text of the form or any attached documents provided by the Division. In submitting this form, the applicant agrees with the Department to use "electronic" means to conduct "transactions" (as those terms are used in the Uniform Electronic Transactions Act, AS 09.80.010 – AS 09.80.195) that relate to this form and that the Department need not retain the original paper form of this record: the department may retain this record as an electronic record and destroy the original.

ADL # 231519



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DEPARTMENT OF NATURAL RESOURCES

Division of Mining, Land and Water

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MATERIAL SITE RECLAMATION PLAN OR LETTER OF INTENT/ANNUAL RECLAMATION STATEMENT AS 27.19.030 – 27.19.050

In accordance with Alaska Statute 27.19, reclamation is required of all mining operations, including sand and gravel extraction. Completion of this form will meet the law's requirements for a **reclamation plan** (see below for filing requirements; due date: at least 45 days before mining is proposed to begin; requires approval by the Division of Mining, Land and Water). Completion of this form will also serve as a **letter of intent** for operations exempt from the plan requirement (due date: before mining begins). No approval is required for a letter of intent, but a miner who files a letter of intent must, before December 31, file an **annual reclamation statement** (Section 8 of this form).

Check applicable box:

- ☒ A. RECLAMATION PLAN (REQUIRED if the operation will disturb five or more acres this year, OR 50,000 cubic yards, OR if the operation has a cumulative disturbed area of five or more acres)
- ☐ B. RECLAMATION PLAN-VOLUNTARY (for an operation below the limits shown in Box A but wanting to qualify for the statewide bonding pool)

- ☐ C. LETTER OF INTENT (less than five acres to be disturbed AND less than 50,000 cubic yards AND less than five acres unreclaimed area) NOTE: A miner who files a letter of intent is also required to file an annual reclamation statement at the end of the year.

THIS RECLAMATION PLAN/LETTER OF INTENT IS FOR CALENDAR YEAR _____
(If you checked either box a or b above and propose a multi-year plan, state all years covered.)

1. **MINER INFORMATION** (If there is more than one miner, attach a list of the names, addresses, and telephone numbers of all other owners, operators, or leaseholders of the mining operation)

Dept. of Transportation and Public Facilities

Name of miner who will serve as agent for notice purposes
2301 Peger Rd

Address (notify the department of any later change of address)

Fairbanks

AK

99709

907 451-5425

City

State

Zip code

Telephone

Dept. of Natural Resources - MLW

Name of landowner (if other than miner) or public land management agency

MMS# 231519

Federal or state casefile number (if any) assigned to the site

2. LEGAL DESCRIPTION OF PROPOSED MINING SITE

Section <u>30 & 31</u>	16S	2E	Copper River
Legal Subdivision/Section/Quarter-Section	Township	Range	Meridian

3. DESCRIPTION OF THE MINING OPERATION (if you checked box a or b on p. 1 of this form and are proposing a multi-year reclamation plan, attach separate sheets as needed showing acreage to be mined, volume to be mined, and existing acreage of mined area for each year covered by the plan)

- a. 5< Total acreage to be mined or disturbed during the year.
- b. As Needed Estimated total volume to be mined or disturbed, including overburden.
- c. Riprap & Gravel Type of material (sand, gravel, peat, etc.).
- d. >20 Existing acreage of mined area (disturbed area that has not yet been reclaimed, but counting only acreage disturbed after October 15, 1991).

4. DESCRIPTION OF THE RECLAMATION OPERATION

- a. The total acreage that will be reclaimed during the year (or each year, if for a multi-year reclamation plan) is:
See Attached
- b. Provide a list of equipment (type and quantity) to be used during the reclamation operation.
- c. A time schedule of reclamation measures shall be included as part of the plan.

The following measures must be considered in preparing and implementing the reclamation plan. Please mark those measures appropriate to your reclamation activity:

- ☒ Topsoil that is not promptly redistributed to an area being reclaimed will be separated and stockpiled for future use. This material will be protected from erosion and contamination by acidic or toxic materials and preserved in a condition suitable for later use.
- ☐ The area will be backfilled, graded and recontoured using strippings, overburden, and topsoil to a condition that allows for the reestablishment of renewable resources on the site within a reasonable period of time. It will be stabilized to a condition that will allow sufficient moisture to be retained for natural revegetation.
- ☒ Stockpiled topsoil will be spread over the reclaimed area to promote natural plant growth that can reasonably be expected to revegetate the area within five years.
- ☐ Stream channel diversions will be relocated to a stable location in the flood plain.
- ☒ Exploration trenches or pits will be backfilled. Brush piles, vegetation, topsoil, and other organics will be spread on the backfilled surface to inhibit erosion and promote natural revegetation.
- ☐ All buildings and structures constructed, used, or improved on land owned by the State of Alaska will be removed, dismantled, or otherwise properly disposed of at the completion of the mining operation.
- ☐ Any roads, airstrips or other facilities constructed to provide access to the mining operation shall be reclaimed (unless otherwise authorized) and included in the reclamation plan.
- ☐ Peat and topsoil mine operations shall ensure a minimum of two inches of suitable growing medium is left or replaced on the site upon completion of the reclamation activity.
- ☐ If extraction occurs within a flood plain, the reclamation activity shall reestablish a stable bed and bank profile such that river currents will not be altered and erosion and deposition patterns will not change.

NOTE: If you propose to use reclamation measures other than those shown above, or if the private landowner or public land manager of the site requires you to use stricter reclamation measures than those shown above, attach a list of those measures to this plan.

5. ALTERNATE POST-MINING LAND USE

- ☐ The mining site is public land. The land management agency's land use plan (if any) for post-mining land use is:
-
- ☐ The mining site is public land. As allowed by AS 27.19.030(b), I propose to reclaim it to the following post-mining land use:
-
- ☐ The mining site is private property. The private landowner plans to use it for the following post-mining land use:
-

6. ATTACHMENTS

- ☐ If the mining operation has additional owners, operators, or leaseholders not shown on p. 1 of this form, attach a list of their names, addresses, and telephone numbers.
- ☒ Attach a USGS map at a scale no smaller than 1:63,360 (inch to the mile) showing the general vicinity of the mining operation and the specific property to be mined. Option: If you checked Box C on the first page of this form and the mining site is adjacent to an airport or public highway, state the name of the airport or the name and milepost of the public highway.
- ☒ Attach a diagram of the mined area (this term includes the extraction site, stockpile sites, overburden disposal sites, stream diversions, settling ponds, etc.) and the mining operation as a whole (this term includes the roads you plan to build, your power lines, support facilities, etc.). Show and state the number of acres to be mined during the year. (If you checked Box A or B on the first page of this form and your plan covers more than one year, show each year's work.) Show the location corners or property boundaries of the site in relation to the reclamation work and any other areas affected by the operation.
- ☐ Attach a list of the equipment (type and quantity) to be used during the reclamation activity.
- ☐ A time schedule of events must be attached that includes dates and activities related to this reclamation plan.
- ☐ If the site is private land not owned by the miner, attach a signed, notarized statement from the landowner indicating the landowner's consent to the operation. The landowner may also use the consent statement to notify the department that the landowner plans a post-mining land use incompatible with natural revegetation and therefore believes that reclamation to the standard of AS 27.19.020 is not feasible.
- ☐ For those miners that are required to file an annual reclamation statement, attach photographs and/or videotapes dated and described as to location of the reclamation activity that was completed.
- ☐ If you propose to use reclamation measures other than those listed on this form, or if the private landowner or public land manager of the site requires you to use stricter reclamation measures, attach a list of those measures.

7. RECLAMATION BONDING (REQUIRED ONLY IF YOU CHECKED BOX A or B ON THE FIRST PAGE OF THIS FORM)

The total acreage of my mining operation that is subject to the bonding requirement for the current year is _____ acres (add acreages stated in Section 3(a) and 3(d) of this form).

The per-acre bond amount is \$750/acre or a total bond amount of \$_____

Please check the appropriate bonding method that you will apply toward this reclamation plan:

- ☐ Participation in the statewide bonding pool.
- ☐ Posting a corporate surety bond.
- ☐ Posting a personal bond accompanied by a letter of credit, certificate of deposit, or a deposit of cash or gold.
- ☐ Posting a bond or financial guarantee with another government agency that has jurisdiction over the mining operation, as allowed by a cooperative management agreement between that agency and the Division of Mining, Land and Water.
- ☐ Posting a general performance bond with a state agency that meets the requirements of 11 AAC 97.400(4).

The above reclamation plan/letter of intent and all attachments are correct and complete to the best of my knowledge.



Signature of Miner

8/21/2025

Date

AS 27.19.030 and AS 27.19.050 require a miner either to file a reclamation plan for approval or to file a letter of intent followed by an annual reclamation statement. AS 38.05.035(a) authorizes the director to decide what information is needed to process an application for the sale or use of state land and resources. This information is made a part of the state public land records and becomes public information under AS 40.25.110 and 40.25.120 (unless the information qualifies for confidentiality under AS 38.05.035(a)(8) and confidentiality is requested, AS 43.05.230, or AS 45.48). Public information is open to inspection by you or any member of the public. A person who is the subject of the information may challenge its accuracy or completeness under AS 44.99.310, by giving a written description of the challenged information, the changes needed to correct it, and a name and address where the person can be reached. False statements made in an application for a benefit are punishable under AS 11.56.210. In submitting this form, the applicant agrees with the Department to use "electronic" means to conduct "transactions" (as those terms are used in the Uniform Electronic Transactions Act, AS 09.80.010 – AS 09.80.195) that relate to this form and that the Department need not retain the original paper form of this record: the department may retain this record as an electronic record and destroy the original. In submitting this form, the applicant certifies that he or she has not changed the original text of the form or any attached documents provided by the Division.

8. **ANNUAL RECLAMATION STATEMENT—REQUIRED** IF YOU FILED A LETTER OF INTENT (CHECKED BOX C ON THE FIRST PAGE) FOR THIS OPERATION. DUE DATE: DECEMBER 31, _____. YOU MUST FILE EVEN IF THE MINING DESCRIBED IN YOUR LETTER OF INTENT DID NOT TAKE PLACE.

This _____ annual reclamation statement is for:
(year)

- a. _____ Total acreage mined.
- b. _____ Total volume mined or disturbed, including overburden.
- c. _____ Total acreage reclaimed.
- d. _____ Cumulative total of unreclaimed acreage.
- e. Reclamation measures that were used (check appropriate measures from Section 4, DESCRIPTION OF THE RECLAMATION OPERATION, and attach list of additional or stricter measures if applicable).

The above annual reclamation statement and all attachments are correct and complete to the best of my knowledge.

Signature of Miner

Date

AS 27.19.030 and AS 27.19.050 require a miner either to file a reclamation plan for approval or to file a letter of intent followed by an annual reclamation statement. AS 38.05.035(a) authorizes the director to decide what information is needed to process an application for the sale or use of state land and resources. This information is made a part of the state public land records and becomes public information under AS 40.25.110 and 40.25.120 (unless the information qualifies for confidentiality under AS 38.05.035(a)(8) and confidentiality is requested, AS 43.05.230, or AS 45.48). Public information is open to inspection by you or any member of the public. A person who is the subject of the information may challenge its accuracy or completeness under AS 44.99.310, by giving a written description of the challenged information, the changes needed to correct it, and a name and address where the person can be reached. False statements made in an application for a benefit are punishable under AS 11.56.210. In submitting this form, the applicant agrees with the Department to use “electronic” means to conduct “transactions” (as those terms are used in the Uniform Electronic Transactions Act, AS 09.80.010 – AS 09.80.195) that relate to this form and that the Department need not retain the original paper form of this record: the department may retain this record as an electronic record and destroy the original. In submitting this form, the applicant certifies that he or she has not changed the original text of the form or any attached documents provided by the Division.

Non-refundable filing fee for reclamation plan: See current Director's Fee Order for applicable fees.

For Department Use Only
Application received date stamp

Receipt Type: 17

State of Alaska
Department of Transportation & Public Facilities
Mining and Reclamation Guidelines
Material Site 851-077-5
Copper River Highway MP 26

These guidelines are subject to the Alaska Department of Natural Resources (DNR) Material Sale Contract, ADL ____ and stipulations contained therein. For each new use or project, the user or contractor shall submit a Project Mining and Reclamation Plan to DNR for approval, subject to DOT&PF review, prior to any mining activities.

This is a designated material site, Master Material Site ADL 231519, under AS 38.05.550 (b).

Legal Description

Section 30: S1/2SE1/4 and Section 31 SW1/4NE1/4 Township 16 South, Range 2 East, Copper River Meridian. The site contains approximately ~60 acres.

General Information

This site is located at milepost 26 on the Copper River Highway. A short access road leads to the site from the Copper River Highway.

This site contains Fluvial gravel. The water table in this site has been estimated at between 4' and 14' below grade over the past 40 years. Excavations will remain above the water table where possible. Any excavations below the water table will be done in consultation with DNR.

Additional site information is available at the DOT&PF Materials office, 2301 Peger Road, Fairbanks, Alaska 99709.

Mining Guidelines

The Plan will adhere to the following guidelines.

1. The contractor or user shall locate site boundaries to verify work stays inside buffers. There is a 100' vegetative screen surrounding the entire site which shall remain undisturbed. Clearly mark buffer lines in work areas.
2. Continue working within the existing cleared area taking the floor down.
3. Do not place organics or overburden piles onto any future mining areas.
4. At the end of each project or use, grade the pit floor level to gently sloping to blend with earlier depth limits. Maintain the site in a clean, neat condition. After each use, remove all equipment, structures, vehicles and trash.

5. All mining and stockpiling activities shall be in accordance with applicable Construction General Permits (CGP) and Storm Water Pollution Prevention Plans (SWPPP)
6. Disposal of unusable excavation material from off-site construction projects is discouraged at this site because all cleared areas are potentially mineable in future. It should only be allowed on areas of lowest quality rock that are unlikely to be utilized. DNR permission is required, in consultation with DOT&PF Materials Section.

Reclamation Objectives and Guidelines

The reclamation plan has several objectives:

1. To not preclude or hinder future development of un-mined areas.
2. To blend with surrounding topography and not be visible from the highway.
3. To prevent erosion and sediment transport to surrounding, undisturbed areas.
4. To allow reestablishment of native vegetation and wildlife habitat.
5. To leave the site in a safe condition that does not endanger people or wildlife.

Reclamation activities will include:

1. In areas with soil or soft rock that can be graded, leave slopes along the material site boundaries, or where future development is not anticipated at 3H: 1V or flatter.
2. Spread available overburden and then organic material on reclaimed slopes. Allow reclaimed areas to revegetate naturally.
3. If there are areas with steep quarry walls, rock faces may be left such that the overall slope angle is 1H:4V or flatter, benches are 20 feet wide and faces less than 40 feet high. Faces shall be scaled of loose rock. Access to benches and top of worked faces will be blocked.

Project Mining and Reclamation Plan

Prior to use of the site for any project, the contractor or user shall submit a Project Mining and Reclamation Plan, in accordance with AS.27.19 and 11 AAC 97 to DNR for approval, subject to DOT&PF review. The Plan describes the proposed plan of operation and shall be in compliance with guidelines listed here. Upon approval, the Plan will be followed by the contractor or user and if applicable, the DOT&PF Project Engineer. The plan should include the following:

The **sketch map** shall include:

1. Site boundaries, buffers
2. Proposed working limits, to be marked on the ground
3. Organic debris and overburden stockpile areas
4. Work pad, material stockpile locations, processing equipment locations
5. Scale of drawing, north arrow, and specific dimensions as appropriate

The **narrative** shall include:

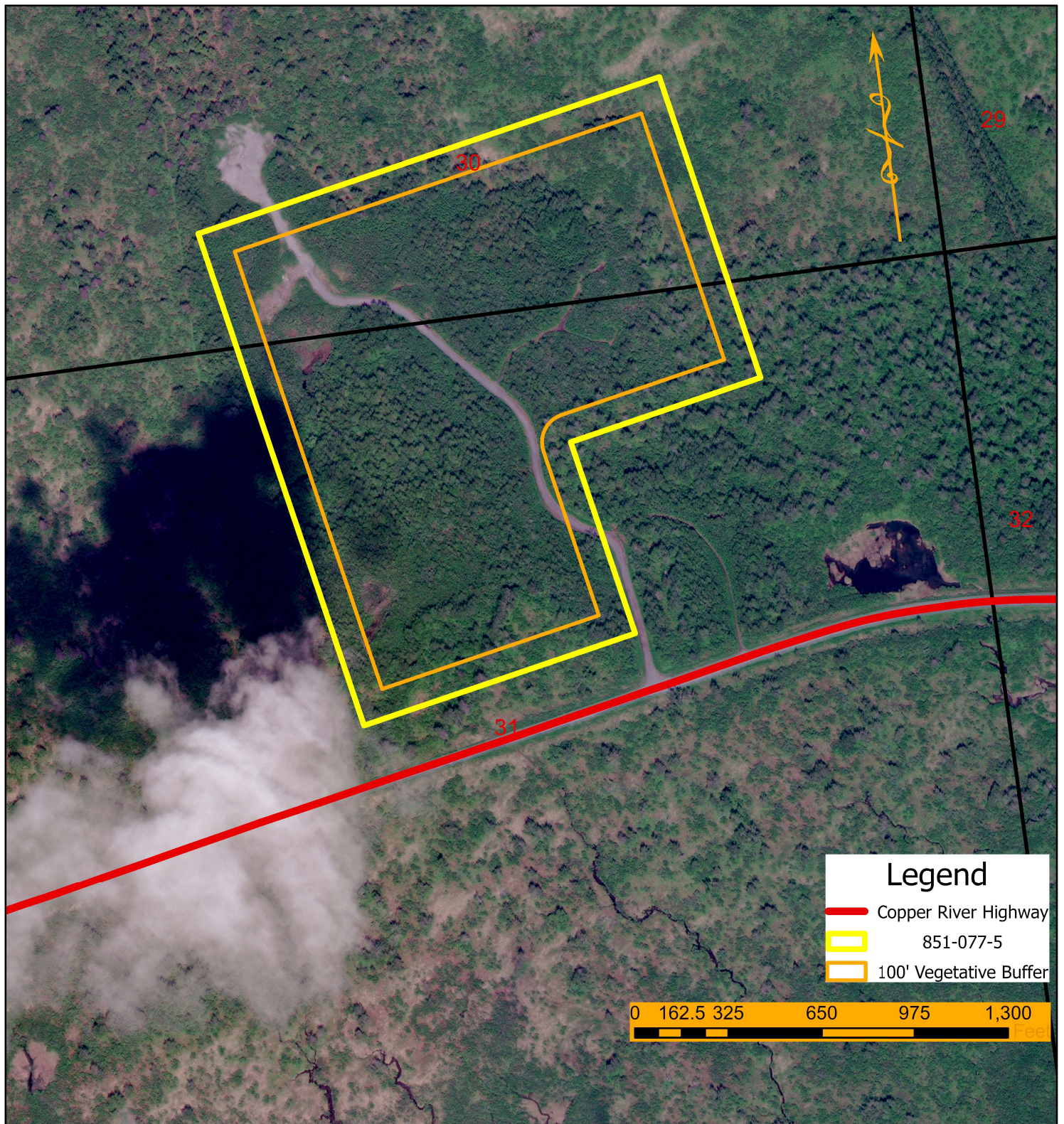
1. Methods of operation

2. Estimated quantities for removal
3. Length and times of operation (day, month, year, and working hours)
4. Blasting plan if applicable, detailing explosive and detonation types, onsite storage and duration of blasting
5. Air and water pollution control measures
6. Reclamation measures

Supplements and amendments

Supplements and amendments to an approved mining and reclamation plan may be initiated by the contractor, user or the DOT&PF Project Engineer, when conditions warrant such action. Supplements and amendments must be mutually agreed upon and proper approval obtained prior to commencement of work of a changed nature.

1. Minor changes are those that affect details of the operation, but remain in compliance with the development guidelines. These changes may be authorized by the DOT&PF Project Engineer.
2. Major changes are those which cause the final outcome of the site to be significantly different from the approved mining and reclamation plan or are not in compliance with the development guidelines. These require approval by DNR and the DOT&PF Project Engineer.



Legend

- Copper River Highway
- 851-077-5
- 100' Vegetative Buffer



M.S. 851-077-5

T16S, R2E CRM

Section 30: S1/2SE1/4
Section 31: SW1/4NE1/4

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION
AND PUBLIC FACILITIES

MATERIAL SITE PLAN

M.S. 851-077-5

NORTHERN REGION

Date: 8/8/2025

SCALE NTS
DRAWN BY: KAW

Current: ~60 acres

