

0018



AMAX COAL COMPANY

WESTERN OPERATIONS
ENVIRONMENTAL AFFAIRS
MEMORANDUM

25 September 1992

TO: Steven R. Laird
FROM: Mickey Steward
SUBJECT: Options for Revegetation Success Standards

Success standards for previously mined lands fall under R645-301-356-250, which states, "For areas previously disturbed by mining that were not reclaimed to the requirements of R645-200 through R645-203 and R645-301 through R645-302 and that are remined or otherwise redisturbed by coal mining and reclamation operations, at a minimum, the vegetative ground cover will be not less than the ground cover existing before redisturbance and will be adequate to control erosion.

There are two options that will provide a quantitative measure for evaluating whether the revegetated activity is "adequate to control erosion". These options are:

Option One

Select revegetated AML sites in the region local to the Castle Gate reclamation activities that have been reclaimed under circumstances similar to those at Castle Gate. Use these sites for direct comparison at the time of bond release for meeting the performance standards given in R645-301-353.

Option Two

Use the existing Grass-Sage reference area in Sowbelly Gulch as the reference area for reclamation at all Castle Gate sites, but evaluate cover and production at 80 percent of the reference area values with the sampling techniques employing a 90 percent statistical confidence interval (i.e., one-sided test with a 0.10 alpha error). The performance standards of R645-301-353 will be met.

In neither case is there a requirement to meet any of the requirements of R645-301-356 except 250. Therefore there is no need to meet any set shrub standard.

If you have any questions, I am in the office at 307/687-3206. Thank you.