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TO: Daron Haddock, Permit Supervisor

FROM: Paul Baker, Reclamation Biologist

DATE: November 4, 1992

RE: October 28, 1992, Resubmittal of the Reclamation Plan for Sowbelly Gulch, AMAX Coal Co., Castle Gate Mine, Folder #2, ACT/007/004, Carbon County, Utah

SUMMARY

The Sowbelly Gulch reclamation plan and Chapter 9 have been revised to conform to the requirements of my September 16, 1992, memorandum.

ANALYSIS

R645-301-341 **Revegetation Plan**

Deficiency:

1. The mulching plan presented in the revised Chapter 9 must be used at Sowbelly Canyon, and Section 3.2 of the plan must be revised to be consistent with Chapter 9. Universal Soil Loss Equation calculations contained in the appendices must also be revised to reflect the plan in Chapter 9.

Response and Analysis:

The revised Chapter 9 received October 26, 1992, and Chapter 3.2 are consistent, and no further changes to the Chapter 9 mulching plan need to be made.

Deficiencies:

None.

Deficiency:

2. The statement on page 3.2-26 that reclaimed areas will be seeded with grasses and legumes needs to be clarified to be consistent with plans to use shrubs and non-leguminous forbs.

Response and Analysis:

Section 3.2-5(4) has been revised to state that grasses, legumes, forbs, and shrubs will be planted.

Deficiencies:

None.

Deficiency:

3. The seed mix to be used at Sowbelly Canyon must meet the requirements of the performance standards. Seed mix 1 may not be used unless Amax can demonstrate that the introduced species in it are necessary and desirable to achieve the postmining land use. The use of the revised seed mix 3 is recommended.

Response and Analysis:

The seed mixes in Chapter 9 have been revised so that they are acceptable, and Chapter 3.2 references the correct seed mixes.

Deficiencies:

None.

Deficiency:

4. This section must include plans to restore riparian vegetation within 20 feet of stream channels. The existing plan to use planting mix 2 or a modified version of the seedling planting list in species mix 4 of the proposed Chapter 9 are suggested.

Response and Analysis:

Areas within 20 feet of channels SBRD-1 (A, B, C, and D) will be seeded with species list 3 from Chapter 9. Species list 3 is a riparian area mixture and is acceptable for these areas. AMAX may want to exclude willows from the planting mix as willows will probably not grow in these drainages.

Deficiencies:

None.

Deficiency:

5. In accordance with R645-301-353, all areas within the range of seeding equipment must be seeded.

Response and Analysis:

Exhibit 3.2-5 states that cut slopes to remain will be treated as described in Chapter 9. The newest submittal of Chapter 9 specifically includes highwall and cut slope areas.

Deficiencies:

None.

RECOMMENDATIONS

All of the deficiencies outlined in the previous review of this chapter have been responded to satisfactorily. Approval is recommended.