

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

August 17, 2012

TO: Internal File

FROM: Priscilla Burton, Team Lead

RE: Revised Reclamation Seed Mixes, Alton Coal Development, Coal Hollow Mine Permit C/025/0005, Task ID #4148

SUMMARY:

In anticipation of seeding this fall, Alton Coal Development revised their seed mix to include a cover crop of Triticale, a sterile cross between wheat and rye and to balance the ratio of grasses, shrubs and forbs. The final mix retains all the original components and provides approximately 4 lbs of pure live seed/ac each for perennial grasses, shrubs, and forbs for a total of 12.23 lbs pls/ac. Triticale was added at 10 lbs pls/ac. This light seeding of grasses may encourage shrub growth that is vital to sage grouse. Changes to the seed mix are under review by Joe Helfrich, the Utah DWR and Mt. Nebo Scientific.

I have ensured that the narrative regarding soil amendments in Section 341.220 is retained. The application should be approved, pending the biologists' decision.

TECHNICAL ANALYSIS:

RECLAMATION PLAN

TOPSOIL AND SUBSOIL

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-240.

Analysis:

On first glance the application appeared to eliminate Section 341.220, Planting and Seeding Methods. However a revised application received via email on August 10, 2012 corrected the error and explained that dual amendments under review would affect pagination.

TECHNICAL MEMO

There has been no change to the commitments found in Section 341.220 of the MRP for evaluation of compaction and nutrient analysis prior to seeding. This section spells out the placements of topsoil followed by collection of one composite sample per 2 – 5 acres (depending on soil type). The sample will be analyzed for the major plant nutrients: nitrogen, phosphorus and potassium.

Findings:

The topsoil sampling and analysis requirement prior to seeding has been retained. This amendment should be approved and incorporated.

RECOMMENDATIONS:

The topsoil sampling and analysis requirement prior to seeding has been retained. This amendment should be approved and incorporated.