



June 12, 2017

To: Ms. Priscilla Burton, MS, CPSSc
Environmental Scientist III
Utah Division of Oil, Gas & Mining
Price Field Office
319 North Carbonville Road #C
Price, Utah 84501-2351

Re: Prime Farmland Productivity Method Task 5369, Areas 2 & 3, Coal Hollow Mine C0250005

Dear Ms. Burton,

This letter is in response to your request for review of soil productivity methods of reclaimed prime farmland soils, additional comments regarding mixing of B and C horizon materials, and cover crop seed mixes for stockpiled soil materials.

R645-302-317.600: Revegetation and Restoration of Soil Productivity

The proposed method of restoring soil productivity is approved with the following additions:

610 Vegetation Establishment: It is recommended the landowners of each parcel work with local NRCS staff to develop a seeding mix suited to their specific site (irrigated vs. non-irrigated) and operation goals. A specialized seeding mix will likely be more successful, more productive, and potentially less expensive than the mix recommended in Table 3-38.

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621 Measurement of Prime Farmland Productivity: The use of animal unit months (AUMs) is acceptable for the yield assessment at the stated rate of 26 pounds of dry forage consumed per 1,000-pound animal per day.

627.1 Yield Records: Irrigated pastureland production will vary with the amount and timing of irrigation but should easily meet or exceed 2,000 pounds/acre. Dry pastureland production will be closer to the ecological site estimate of 1,100 pounds/acre referenced in Volume 11, Table 43.

Additional areas of review:

Mixing of B & C soil horizon materials:

According to the estimated salvage depths by horizon for soil map units in areas of prime farmland (Table 13, Volume 11) the depth of C horizon material will likely be less than 6 inches mixed with 2.8-3.3 feet of B horizon material. Given those proportions, I do not anticipate any reduction of soil productivity due to mixing B and C horizon material.

Cover crop species for stockpiled soil materials:

Regarding the use of only cool-season species in the cover crop species: warm season plants are rare-to-absent in the Alton area. It is not necessary to plant a warm season species in the stockpile cover mix.

Please contact me with any additional questions you may have.

Regards,

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