

STATE MINE INSPECTOR

JUN 27 2024



Himes Consulting LLC

June 25, 2024
Reference No. 23-48

Arizona State Mine Inspector
Amanda Lothner, Reclamation Specialist
1700 W. Washington, Suite 403
Phoenix, AZ 85007-2805

Re: Reclamation Plan for Thomasland Holdings, LLC Long Material Source

Dear Ms. Lothner:

Enclosed please find one original and three copies of the Reclamation and Closure Plan for Thomasland Holdings, LLC Long Material Source, northeast of Yuma in Yuma County, AZ. Also enclosed is the \$3,800 application fee. Please feel free to contact me in regards to any questions.

Sincerely,

A handwritten signature in cursive script that reads "Jill A. Himes".

HIMES CONSULTING, LLC
Jill A. Himes

Cc: Blake Thomas, Thomasland Holdings, LLC

RECLAMATION AND CLOSURE PLAN

THOMASLAND HOLDINGS, LLC
LONG MATERIAL SOURCE

**SUBMITTED TO THE STATE MINE
INSPECTOR'S OFFICE FOR REVIEW AND
APPROVAL IN ACCORDANCE WITH
ARIZONA REVISED STATUTE
TITLE 27 - CHAPTER 6
STATE MINE INSPECTOR AGGREGATE
MINED LAND RECLAMATION**

JUNE 2024

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1.0 ADMINISTRATIVE INFORMATION

Company: Thomasland Holdings, LLC

Contact: Blake Thomas
Thomasland Holdings, LLC
P.O. Box 6486
Yuma, AZ 85366
(Office) (928) 726-1951
blake@thomaslandholdings.com

Applicant: Blake Thomas
Thomasland Holdings, LLC
P.O. Box 6486
Yuma, AZ 85366
(Office) (928) 726-1951
blake@thomaslandholdings.com

Permit
Technical
Consultant: Jill Himes, Himes Consulting LLC
3301 West Genoa Way
Chandler, AZ 85226
(480) 899-5708
(602) 499-9253 (cell)
jillhimes@cox.net

Landowner: Thomasland Holdings, LLC
P.O. Box 6486
Yuma, AZ 85366
(Office) (928) 726-1951

Parcel No: 002-122-921

Operator: Thomasland Holdings, LLC

2.0 INTRODUCTION

2.1 PURPOSE AND SCOPE

Thomasland Holdings, LLC proposes to conduct aggregate mining and processing at their property northeast of Yuma in Yuma County, Arizona. The Long Material Source is located within Section 3 in Township 8 South, Range 20 West, Gila and Salt River Meridian.

The purpose of this Mine Reclamation and Closure Plan (MRCP) is to present the details of rehabilitation of the Long Material Source in Yuma County, Arizona concurrent with or after mining operations have ceased in accordance with the Arizona Aggregate Mined Lands Act (AAMLRA) (Arizona Revised Statutes[A.R.S.] § 27-1201 as authorized by A.R.S. § 27-1204. This plan has been developed pursuant to the format and content prescribed in the Arizona Aggregate Mined Lands Reclamation Rules (Arizona Administrative Code {A.A.C}, R11-3-101, et seq.). The MRCP addresses environmental, technical and operational issues that are identified in those documents.

2.2 RECLAMATION STATEMENT OF RESPONSIBILITY

Thomasland Holdings, LLC assumes responsibility for the reclamation of surface disturbances that are attributable to the aggregate mining unit consistent with A.R.S. § 27-1201 and A.C.C. R11-3-501 pursuant to that chapter. All areas that have been disturbed at the site will be reclaimed to a safe and stable condition when mine operations conclude.

Blake Thomas

2/29/24

Signature

Date

member

Title

2.3 RECLAMATION APPROACH

Thomasland Holdings, LLC will reclaim areas surrounding and within the excavated areas necessary to accomplish the post-mining land use of open space. The goals of the mine plan and reclamation measures are to provide for a safe, stable, and sustainable site once mining has ceased. Reclamation will take place concurrently to the degree possible, but no later than the cessation of mining activities.

2.4 CURRENT OWNERSHIP AND LAND USE INCLUDED IN THE AGGREGATE MINING UNIT

Thomasland Holdings, LLC is planning to conduct aggregate mining and processing operations for commercial use at the Long Material Source. Their parcel is largely undisturbed and includes approximately 265 acres, as shown in Table 1 below, and in Figure 3. The extraction/processing operation consists of mining to remove aggregate material as described in A.R.S. § 27-441. At the Long Material Source, the process includes the use of a screen, crusher, and other mobile equipment for the support of production, and other construction material related operations. Proposed operations would include excavation, screening, crushing, stockpiling, loading, and hauling. Access is from East County 5th Ave. Land use is currently open space with a former manufactured home, pad, and roads. Thomasland Holdings, LLC has estimated the removal of up to 3 million cubic yards over a period of 25 years. The closest residence is located 3,200 feet (ft) to the southwest of the nearest proposed excavation area.

Vegetation communities in the project vicinity are lower Colorado subdivision of the Sonoran Desert as described by Brown (1994). Vegetation onsite is sparse and dominated by creosotebush (*Larrea tridentata*). Desert pavement occurs in some areas. Vegetation observed includes paloverde (*Cercidium floridum*), ironwood (*Olneya tesota*), white ratany (*Krameria grayii*), brittlebush (*Encelia farinosa*), desert lavender (*Hyptis emoryi*), catclaw acacia (*Acacia greggii*), ocotillo (*Fouquieria splendens*), and saguaro (*Carnegeia gigantea*). The site occurs within the Arizona Game and Fish Department (AGFD) Game Management Unit 41. This unit is managed for bighorn sheep (*Ovis canadensis*), mule deer (*Odocoileus hemionus*), dove (*Zenaida* sp. and *Columbina* sp.), and quail (*Callipepla gambelii*). Wildlife and/or wildlife sign observed in the project vicinity includes mule deer, blue gray gnatcatcher (*Polioptila caerulea*), mourning dove (*Zenaida macroura*), common raven (*Corvus corax*), and loggerhead shrike (*Lanius ludovicianus*).

Table 1
Existing Surface Disturbance

Feature	Acres
Access Roads	2.0
Other (residential pad)	0.3
Mining	0
Undisturbed	262.7
Total	265

2.5 PROPOSED POST-AGGREGATE MINING LAND USE

Proposed post-aggregate mining land use of the site is open space. Current nearby use is open space, agricultural, and residential.

2.6 DESCRIPTION OF THE AGGREGATE MINING UNIT AND PROPOSED SURFACE DISTURBANCES

Currently the site is undisturbed apart from access roads and a former manufactured home pad and building which will be removed. Proposed surface disturbances include aggregate mining to a final disturbance of approximately 68.5 acres. The parcel includes a large undisturbed buffer area. The mining area encompasses several hills in the central portion of the parcel, as shown in Figure 4. Mining will not result in the formation of a pit as material will be removed from mountainous terrain. Slopes 3:1 (horizontal: vertical) (H:V) or flatter are incorporated into the mining plan. Material removal will be to a depth of approximately 20 feet below ground surface. The processing area, located on the south side, will include a crusher, screen, stockpiles, and an office trailer. Proposed surface disturbances are shown in Table 2 below.

Table 2
Proposed Final Surface Disturbance

Feature	Acres
Mining Area	68.5
Processing Area & Stockpiles	21.5
Access Roads	3.9
Undisturbed	171.1
Total	265

2.7 EXISTING AND PROPOSED FINAL TOPOGRAPHY

Existing topography and survey information is provided in Figure 3 attached. Existing elevations range from approximately 400 ft above mean sea level (msl) in the northeastern corner of the property to 200 ft above msl in the southwestern portion of the property. The proposed mining area is located on several small hills. Proposed final elevations are shown in Figure 4 attached. Proposed final topography of the slopes will have a 3:1 (H:V) slope or flatter to provide a safe slope at the end of mine life.

2.8 A NARRATIVE DESCRIPTION OF ROADS

Existing dirt roadways within the parcel are all privately owned and are shown in Figures 3 and 4. These include a private extension of East County 5th Street along the western half of the southern boundary, and access roads along the southwestern parcel boundary and southern boundary of the northwestern portion of the parcel. Temporary internal access roads may be used over time as mining advances.

2.9 ACREAGE AFFECTED BY EACH TYPE OF SURFACE DISTURBANCE

Area Descriptions:

2.9.1 Mining Area

Aggregate mining at this site would impact approximately 68.5 acres of largely undisturbed areas. As this site is mountainous, removal of material will not result in a pit but will match ground surface levels on the property boundary. Slopes are planned at a maximum of 3:1 (H:V) or flatter. Final build-out is shown in Figure 4.

2.9.2 Processing Area

The processing area will be located to the south of the mining area, in the south-central portion of the site and would impact 21.5 acres. The processing area will include a crusher, a screen plant, stockpiles, equipment, and an office trailer.

2.9.3 Access Roads

Perimeter access roads will be added to the existing access roads within the parcel. Temporary internal access roads may be used over time as mining advances. Existing access roads are shown in Figure 3, with proposed additional access roads shown in Figure 4.

3.0 RECLAMATION

3.1 EQUIPMENT AND STRUCTURE REMOVAL

All proposed equipment on this site will be mobile and can be re-located at will throughout the mining process. All mobile equipment will be removed from the site. There are no buildings or structures proposed to be located on the site. No fuel will be stored onsite due to shallow groundwater.

3.2 ROADS, POWER LINES, WATERLINES AND FENCES

Access roads will be retained for use by the landowner, with the exception of internal access within the mining and processing areas, as shown in Figure 5. There are no powerlines that occur within the site. There are no waterlines within the site. Mobile generators will be used on an as-needed basis for the mining equipment which will be removed post-mining. The site is not fenced. As no hazardous conditions will remain at the end of reclamation, fencing is not proposed per landowner request.

3.3 AREA PREPARATION

Post-mining, the disturbed portions of the site interior will be scarified to promote natural revegetation, as shown in Figure 5.

3.4 SLOPE STABILIZATION

Mining incorporates 3:1 (H:V) slopes or flatter to result in stability for the area. No additional physical stabilization will be necessary after mining.

3.5 SOIL CONSERVATION

Natural revegetation on previously disturbed areas in the vicinity has been previously successful. Natural revegetation of the disturbed areas is therefore reasonably expected to be successful without soil amendments. Due to the mountainous and rocky terrain, very little topsoil occurs.

3.6 REVEGETATION

To promote natural revegetation, scarification will be conducted within the disturbed areas to support the open space land use of the site. Since these areas are not proposed to support grazing, fish or wildlife habitat, forestry or recreation post-mining land uses, proposed measures to encourage fish and wildlife habitat are not required to be described further in accordance with A.R.S. §27-1271 (B)(9d).

3.7 THE PROPOSED RECLAMATION MEASURES TO ACHIEVE POST MINE LAND USE AND PUBLIC SAFETY

- A. What measures will restrict public access to pits or other hazardous surface features?
As the mined slopes are proposed at 3:1 (H:V) or flatter, no hazardous surface features are anticipated to remain after reclamation. Additional fencing is not proposed per landowner request. In addition, all scrap metal, wood, trash and other debris that pose a threat to public safety or create a public nuisance will be removed.
- B. What measures will be taken to address erosion control and stability?
To address erosion, no permanent piles of mined material or overburden will remain. Slope stability at a 3:1 (H:V) slope or flatter is incorporated into the mining plan.
- C. What measures will be taken to address revegetation, conservation, and the care and monitoring of revegetated areas?
Scarification would promote natural revegetation which occurs in the region. As revegetation is not proposed, monitoring of revegetated areas is not required.

3.8 TIMELINE AND PHASING OF RECLAMATION

Mining will begin immediately upon approval, anticipated in late 2024. In accordance with A.R.S. § 27-926, reclamation & monitoring will be completed within one year of cessation of mining. Proposed tentative schedule includes:

- Mining operations are anticipated to continue for 25 years until 2049.
- Reclamation on the processing and related areas will commence immediately upon completion of mining operations and is estimated to be completed within one year (estimated 2050).
- Reclamation includes scarification to promote natural revegetation, and annual monitoring (trash removal and inspection) and will be deemed complete once ASMI verifies that the owner or operator has fulfilled the requirements of the approved reclamation plan.

3.9 RECLAMATION COSTS – FINANCIAL ASSURANCE

All reclamation costs will be wholly born by the applicant. Financial surety will be obtained by bonding.

4.0 MINE CLOSURE

4.1 MINING AREAS

Reclamation of the mining area will commence immediately upon closure of mining operations. There will be no substantial period between operation and reclamation.

4.2 PROCESSING AND OTHER AREAS

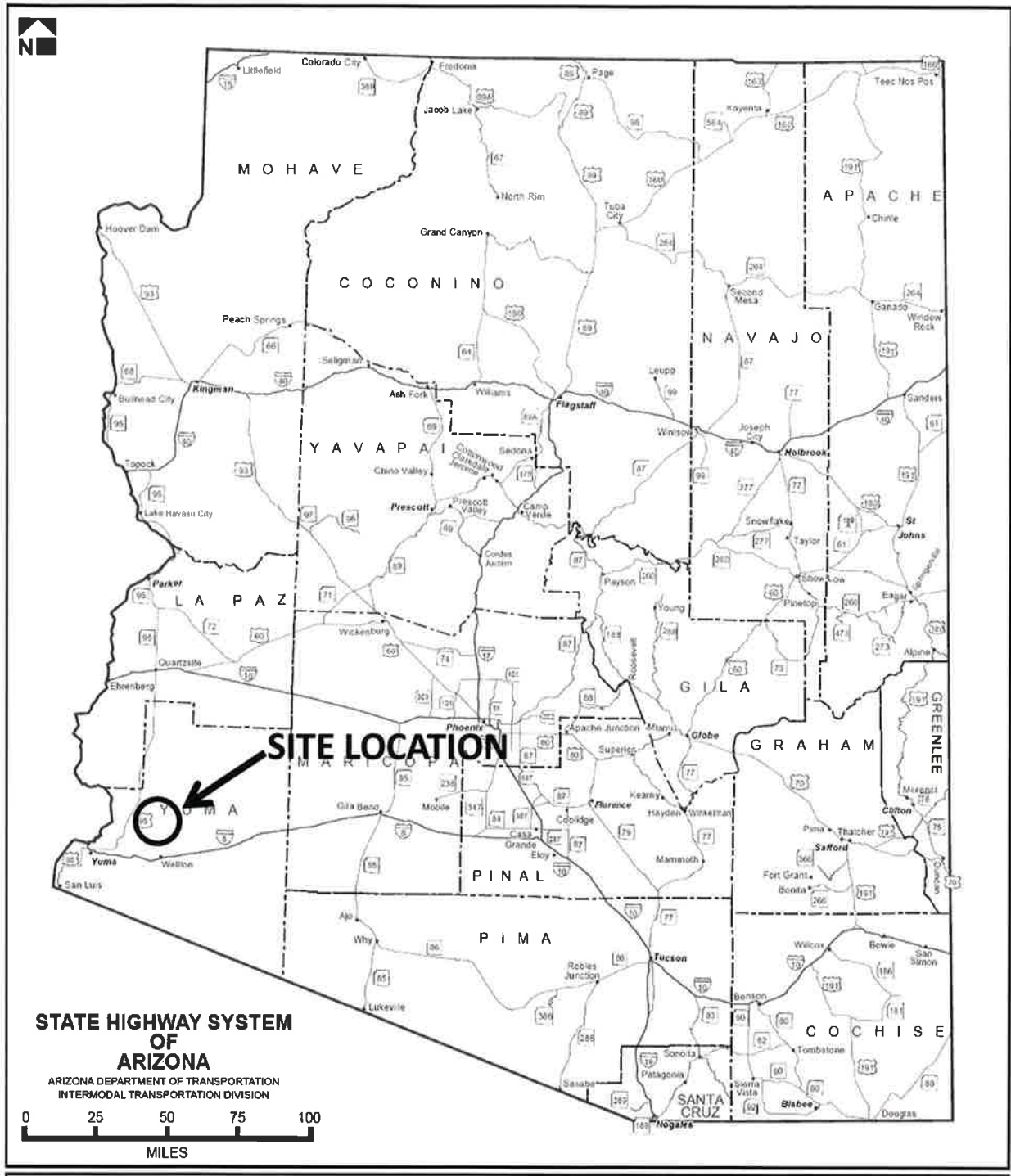
Stockpile areas will be removed by the end of mine life. Reclamation will commence immediately upon completion of mining operations. There will be no substantial period between operation and reclamation.

4.3 PERSONNEL

Personnel employed at this site will be re-assigned to other job sites if possible or assigned to assist with the reclamation process and then re-assigned.

4.4 MONITORING

The closure of operations at this site will be monitored in accordance with the approved conditions of this plan in accordance with the Arizona State Mine Inspector's Office. During reclamation, monitoring will occur annually to remove trash and conduct a general inspection.

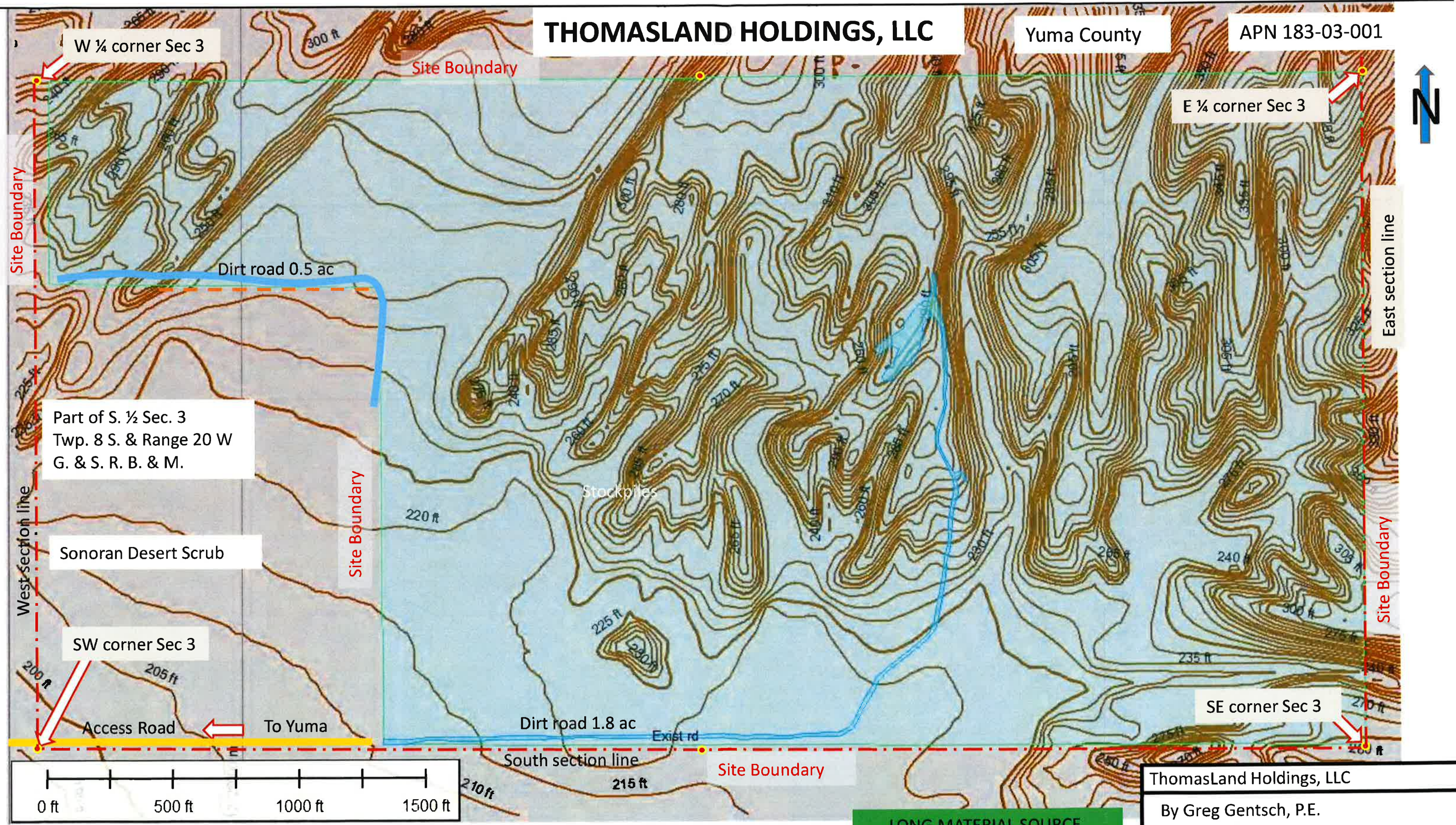


**Figure 1. Vicinity Map.
Long Material Source.
Yuma County, AZ.**

THOMASLAND HOLDINGS, LLC

Yuma County

APN 183-03-001



Part of S. 1/2 Sec. 3
Twp. 8 S. & Range 20 W
G. & S. R. B. & M.

Sonoran Desert Scrub

LONG MATERIAL SOURCE

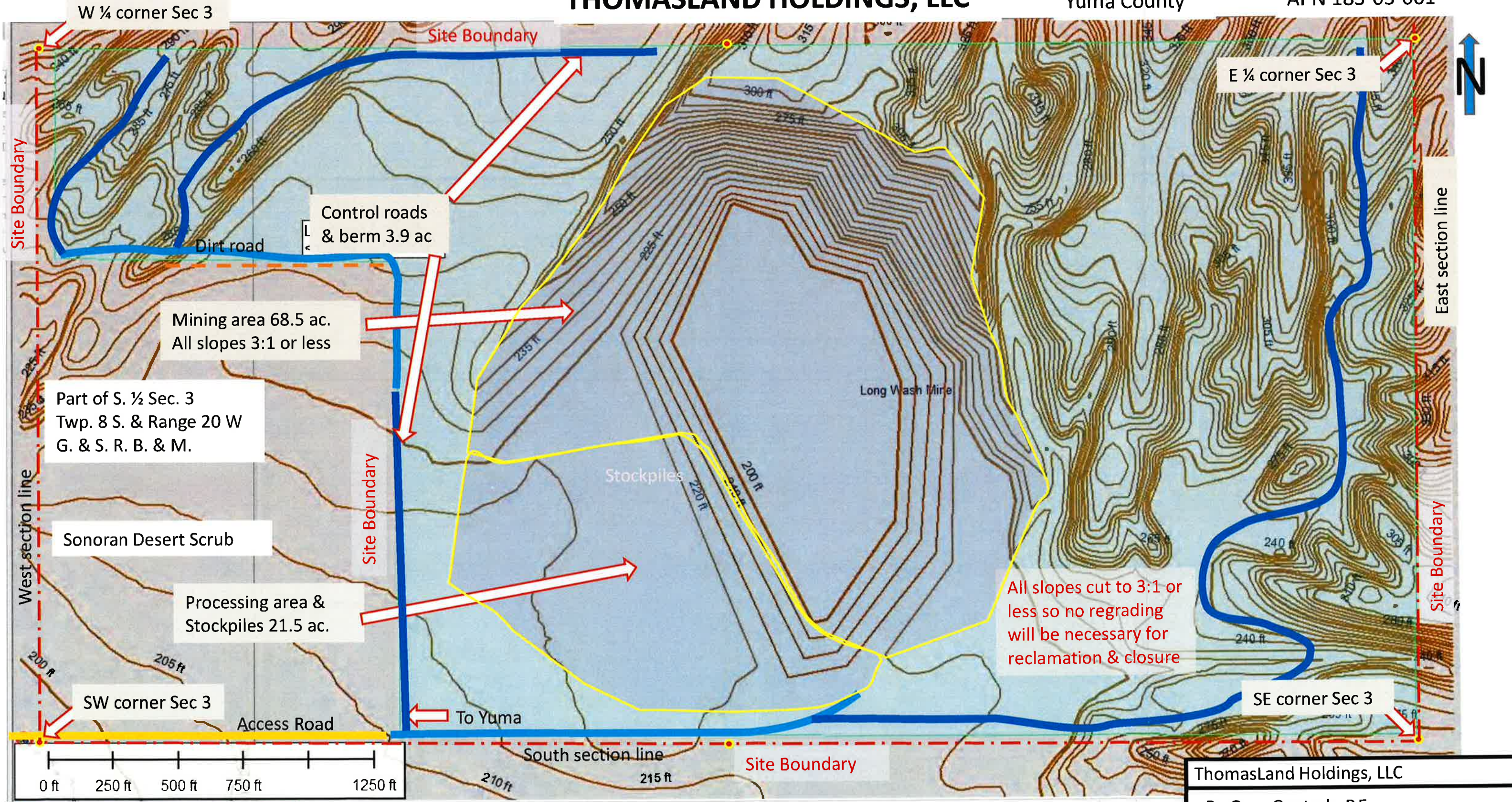
FIGURE 3 - EXISTING CONDITIONS

ThomasLand Holdings, LLC
By Greg Gentsch, P.E.
June 3, 2024

THOMASLAND HOLDINGS, LLC

Yuma County

APN 183-03-001



LONG MATERIAL SOURCE

FIGURE 4 - PROPOSED CONDITIONS

ThomasLand Holdings, LLC

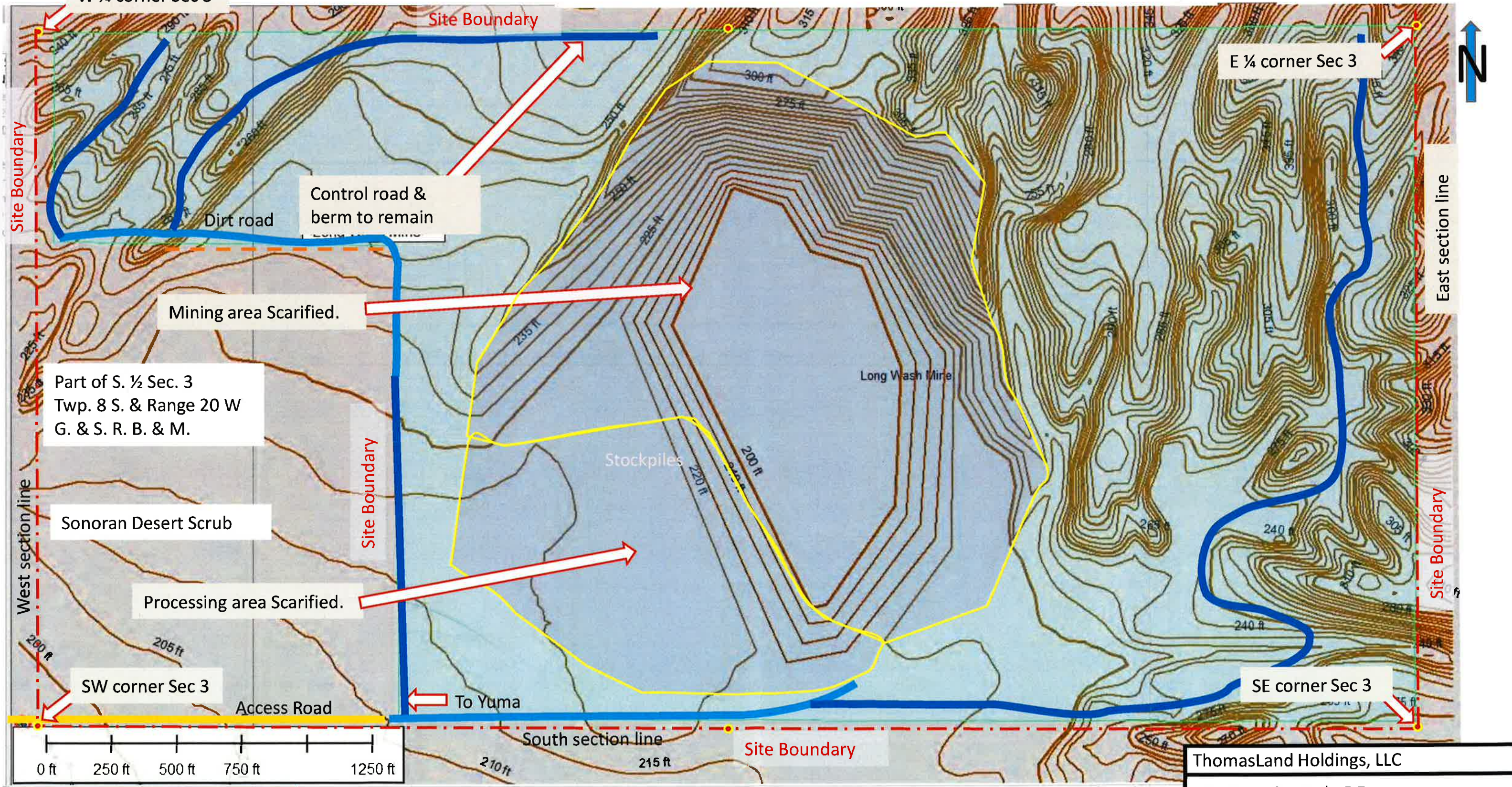
By Greg Gentsch, P.E.

June 3, 2024

THOMASLAND HOLDINGS, LLC

Yuma County

APN 183-03-001



LONG MATERIAL SOURCE

FIGURE 5 - PROPOSED FINAL RECLAMATION

ThomasLand Holdings, LLC

By Greg Gentsch, P.E.

June 3, 2024

APPENDIX 1
RECLAMATION COST ESTIMATE

Reclamation Cost Estimate

Reclamation Cost Estimate Methodology

Unit costs developed for this Reclamation & Closure Plan are based on ADOT-approved estimating sources. Equipment unit costs are based on Equipment Watch Rental Rate Blue Book, Davis Bacon published labor rates, along with estimated productivity for material movement based primarily on the Caterpillar Handbook (2022). ADOT uses this format and protocol for ADOT contractors.

Material volumes and surface areas have been calculated using the topographic base maps provided and plan projection of outlined areas. The pit contours are all 3:1 or flatter. Final reclamation will consist of scarifying all compacted traffic areas other than the access roads which will remain. No fuel will be stored onsite due to shallow groundwater table.

Administrative costs were based on industry-standardized contingency, professional fees to annually inspect and report, as well as indirect costs, contractor profit, and contract administration costs.

Reclamation Cost Estimate Summary

Estimated costs developed for this Reclamation Plan are summarized below. Detailed breakdown for each reclamation activity follows.

Reclamation Activity	Units	Cost per Unit	Costs (\$)
Direct Costs			
Scarification	90 acres	76.09	6,848.33
Trash Disposal	1	570.04	570.04
Subtotal			7,418.37
Administrative Costs			
Administrative Contingency		10%	741.84
Inspect & Report	1 year	3,000	3,000.00
Indirect Costs		2%	148.37
Contractor Profit		10%	741.84
Contract Administration		10%	741.84
Subtotal			5,373.89
Total			12,792.26

Task 1 - Equipment Watch - Rate for D5 Dozer

DATE: 6/12/2024

TASK: Ripping/scarifying compacted surfaces - 90 acres at 4 acres per hour

UNITS: acres

QUANT 90 acres 3 days (22.5 hours) TOTAL

D5 dozer 160-189 hp	\$1,035/day	\$3,105
Ripper	\$39/day	\$117
Estimated operating costs	\$61.26/hr	\$1378.35
Total O & O cost		\$4,600.35
Transport To & From jobsite		
- Yuma local	\$900 ea. way	\$1,800

Labor from Davis Bacon rates - Yuma County ADOT job

16 hrs	Base rate	\$17.26 per hour	\$388.35
16 hrs	Fringes	\$2.65 per hour	\$59.63
0 hrs	No O/T expected		

Duration	3 days
Task Total	\$6,848.33

Price per acre for total	90 acres	\$76.09
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Rental Rate Blue Book®

June 13, 2024

Caterpillar D5
Standard Crawler Dozers

Size Class:
160 - 180 hp
Weight:
N/A



Configuration for D5

Dozer Type
Operator Protection
VPAT
IROPS
Horsepower
Power Mode
170.0 hp
Diesel

Blue Book Rates

** FHWA Rate is equal to the monthly ownership cost divided by 176 plus the hourly estimated operating cost.

Published Rates	Ownership Costs				Estimated Operating Costs Hourly	FHWA Rate** Hourly
	Monthly	Weekly	Daily	Hourly		
Published Rates	USD \$14,795.00	USD \$4,145.00	USD \$1,035.00	USD \$155.00	USD \$61.26	USD \$145.32
Adjustments						
Region (100%)	-	-	-	-		
Model Year (2024: 100%)	-	-	-	-		
Adjusted Hourly Ownership Cost (100%)	-	-	-	-		
Hourly Operating Cost (100%)						
Total:	USD \$14,795.00	USD \$4,145.00	USD \$1,035.00	USD \$155.00	USD \$61.26	USD \$145.32

Non-Active Use Rates

	Hourly
Standby Rate	USD \$44.55
Idling Rate	USD \$106.29

Rate Element Allocation

Element	Percentage	Value
Depreciation (ownership)	30%	USD \$4,428.50/mo
Overhaul (ownership)	47%	USD \$6,953.65/mo
CFC (ownership)	13%	USD \$1,923.35/mo
Indirect (ownership)	10%	USD \$1,479.50/mo
Fuel (operating) @ USD 4.03	39.56%	USD \$24.23/hr

Revised Date: 2nd quarter 2024

These are the most accurate rates for the selected Revision Date(s). However, due to more frequent online updates, these rates may not match Rental Rate Blue Book® Print. Visit the Cost Recovery Product Guide on our Help page for more information.

Rental Rate Blue Book®

June 13, 2024

Miscellaneous MSR-84H
Crawler Tractor Multi-Shank Rippers

Size Class:
To 250 hp
Weight:
1644 lbs



Configuration for MSR-84H

Horsepower: 84.0 hp
Ripper Type: Radial
Number Of Shanks: 3
Power Mode: Hydraulic

Blue Book Rates

** FHWA Rate is equal to the monthly ownership cost divided by 176 plus the hourly estimated operating cost.

	Ownership Costs				Estimated Operating Costs Hourly	FHWA Rate** Hourly
	Monthly	Weekly	Daily	Hourly		
Published Rates	USD \$560.00	USD \$155.00	USD \$39.00	USD \$6.00	USD \$2.42	USD \$5.60
Adjustments						
Region (100%)	-	-	-	-		
Model Year (2024: 100%)	-	-	-	-		
Adjusted Hourly Ownership Cost (100%)	-	-	-	-		
Hourly Operating Cost (100%)						
Total:	USD \$560.00	USD \$155.00	USD \$39.00	USD \$6.00	USD \$2.42	USD \$5.60

Non-Active Use Rates

	Hourly
Standby Rate	USD \$2.32
Idling Rate	USD \$3.18

Rate Element Allocation

Element	Percentage	Value
Depreciation (ownership)	51%	USD \$285.60/mo
Overhaul (ownership)	27%	USD \$151.20/mo
CFC (ownership)	10%	USD \$56.00/mo
Indirect (ownership)	12%	USD \$67.20/mo

Fuel cost data is not available for these rates.

Revised Date: 2nd quarter 2024

These are the most accurate rates for the selected Revision Date(s). However, due to more frequent online updates, these rates may not match Rental Rate Blue Book® Print. Visit the Cost Recovery Product Guide on our Help page for more information.

The equipment represented in this report has been exclusively prepared for Bronson Barson (bbarson@fisherind.com)

Task 2 - Equipment Watch - Rate for Truck with Trailer

DATE: 6/25/2024

TASK: Miscellaneous Trash Removal – 1 pickup truck with trailer

UNITS: 1 load

QUANT 1 load 0.5 days (4 hours) TOTAL

Truck	\$14/hour	\$196
Estimated operating costs	\$25.83/hr	\$103.32
Trailer	\$34/hour	\$136
Estimated operating costs	\$7.52/hour	\$30.08
Total O & O cost		\$465.40

Labor from Davis Bacon rates - Yuma County ADOT job

4	hrs	Base rate	\$17.26 per hour	\$ 69.04
4	hrs	Fringes	\$2.65 per hour	\$ 10.60
0	hrs	No O/T expected		

Trash disposal fee (Yuma County landfill): 1 load \$25

Duration	0.5 days
Task Total	\$ 570.04

Price per acre for total	1 load	\$570.04
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Rental Rate Blue Book®

June 21, 2024

Chevrolet 1500 4X2 GAS (disc. 1998)
Light Duty Trucks

Size Class:
2
Weight:
N/A



Configuration for 1500 4X2 GAS (disc. 1998)

Power Mode **Gasoline** Wheelbase **117.5 Inches**
Gross Vehicle Weight Rating **6100 Pounds**

Blue Book Rates

** FHWA Rate is equal to the monthly ownership cost divided by 176 plus the hourly estimated operating cost.

	Ownership Costs				Estimated Operating Costs Hourly	FHWA Rate** Hourly
	Monthly	Weekly	Daily	Hourly		
Published Rates	USD \$1,310.00	USD \$365.00	USD \$91.00	USD \$14.00	USD \$25.83	USD \$33.27
Adjustments						
Region (100%)	-	-	-	-		
Model Year (1998: 100%)	-	-	-	-		
Adjusted Hourly Ownership Cost (100%)	-	-	-	-		
Hourly Operating Cost (100%)					-	
Total:	USD \$1,310.00	USD \$365.00	USD \$91.00	USD \$14.00	USD \$25.83	USD \$33.27

Non-Active Use Rates

	Hourly
Standby Rate	USD \$4.09
Idling Rate	USD \$25.94

Rate Element Allocation

Element	Percentage	Value
Depreciation (ownership)	23%	USD \$301.30/mo
Overhaul (ownership)	45%	USD \$589.50/mo
CFC (ownership)	15%	USD \$196.50/mo
Indirect (ownership)	17%	USD \$222.70/mo
Fuel (operating) @ USD 3.45	71.62%	USD \$18.50/hr

Revised Date: 2nd quarter 2024

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Rental Rate Blue Book®

June 21, 2024

Miscellaneous 2 AXLE 4 TIRE 20'
Lowboy Trailers

Size Class:
All
Weight:
N/A



Configuration for 2 AXLE 4 TIRE 20'

Power Mode **Manual**

Blue Book Rates

** FHWA Rate is equal to the monthly ownership cost divided by 176 plus the hourly estimated operating cost.

	Ownership Costs				Estimated Operating Costs	FHWA Rate**
	Monthly	Weekly	Daily	Hourly	Hourly	Hourly
Published Rates	USD \$3,200.00	USD \$895.00	USD \$225.00	USD \$34.00	USD \$7.52	USD \$25.70
Adjustments						
Region (100%)	-	-	-	-		
Model Year (2024: 100%)	-	-	-	-		
Adjusted Hourly Ownership Cost (100%)	-	-	-	-		
Hourly Operating Cost (100%)					-	
Total:	USD \$3,200.00	USD \$895.00	USD \$225.00	USD \$34.00	USD \$7.52	USD \$25.70

Non-Active Use Rates

	Hourly
Standby Rate	USD \$13.27
Idling Rate	USD \$18.18

Rate Element Allocation

Element	Percentage	Value
Depreciation (ownership)	47%	USD \$1,504.00/mo
Overhaul (ownership)	27%	USD \$864.00/mo
CFC (ownership)	15%	USD \$480.00/mo
Indirect (ownership)	11%	USD \$352.00/mo

Fuel cost data is not available for these rates.

Revised Date: 2nd quarter 2024

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