
From: Wayland, Joshua
Sent: Wednesday, April 22, 2020 10:22 AM
To: Keller, Kevin; Rogers, Debra
Cc: 10145616_7CountyCoalitionUBR TO1; mmckee; Brian Barton; Floyd, Kathryn K.; Crawford, Amanda L.; Warner, Terry; Magiera, Doree; Perkins, Michael; Croft, Amy; Dobbs, Catherine
Subject: RE: UBR Y -- Waters of the US Baseline Technical Memorandum and GIS files

Kevin,

From your email, it seems you may have identified errors or omissions related to wetland polygons shown in the previously submitted Technical Memorandum or the associated GIS files. If this is the case, we would prefer to receive a corrected Technical Memorandum, rather than an addendum. The idea is to have one complete and finalized field survey report that we can incorporate by reference in the Draft EIS. Obviously, if there are any changes made to the GIS or to the field survey results reported in the memo, then OEA and ICF will have to redo our impact analysis for water resources after receiving the final memo and final GIS. Please keep us updated on when we can expect to receive these.

Best,
Josh

Joshua Wayland, PhD
Environmental Protection Specialist
Office of Environmental Analysis
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202.245.0330

From: Keller, Kevin <Kevin.Keller@hdrinc.com>
Sent: Tuesday, April 21, 2020 3:24 PM
To: Wayland, Joshua <Joshua.Wayland@stb.gov>; Rogers, Debra <Debra.Rogers@icf.com>
Cc: 10145616_7CountyCoalitionUBR TO1 <10145616_7CountyCoalitionUBRTO1@hdrinc.com>; mmckee <mmckee@7county.utah.gov>; Brian Barton <Brian@jonesanddemille.com>; Floyd, Kathryn K. <KKFloyd@Venable.com>; Crawford, Amanda L. <ALCrawford@Venable.com>; Warner, Terry <Terry.Warner@hdrinc.com>; Magiera, Doree <Doree.Magiera@hdrinc.com>; Perkins, Michael <Michael.Perkins@hdrinc.com>; Croft, Amy <Amy.Croft@hdrinc.com>; Dobbs, Catherine <Catherine.Dobbs@hdrinc.com>
Subject: FW: UBR Y -- Waters of the US Baseline Technical Memorandum and GIS files

Josh and Debbie,

See below for our responses (in green) to your comments. Also, we are still working to review delineation data to issue an addendum on the additional wetlands for Wells Draw (and any others if identified). We hope to have the results on aquatic resource polygon updates ASAP so that we could issue an addendum on polygon updates this week. Then STB/ICF would have the corrected data they'd need to move forward with the EIS. With this addendum we wouldn't include the GIS point data for the data forms, but propose to provide updated GIS point data along with the data forms (as indicated in the response below). Once that is updated, you might want us to also provide updated map sets; maybe we should just plan on providing them (note these maps include both polygons and data points. The data points are just

provided for general reference without IDs). Also note that we will provide the data forms well in advance of STB's readiness to publish the EIS.

Kevin

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From: Wayland, Joshua [<mailto:Joshua.Wayland@stb.gov>]
Sent: Monday, April 20, 2020 12:15 PM
To: Keller, Kevin <Kevin.Keller@hdrinc.com>
Cc: Rogers, Debra <Debra.Rogers@icf.com>
Subject: RE: UBRY -- Waters of the US Baseline Technical Memorandum and GIS files

CAUTION: [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Kevin,

I hope you are doing well. As we discussed last week, we have a few additional clarification questions regarding the final Waters of the U.S. Technical Memorandum for the Uinta Basin Railway project:

1. Our previous comments requested clarification on whether seeps and springs were identified during field surveys. The final report contains some mention of seeps and the accompanying GIS contains location information for springs and seeps. The report, however, does not provide any quantitative information on seeps and springs and does not indicate what the source of the data is. Can you please provide clarification on how springs and seeps were identified within the study area? We reviewed available data, such as topographic maps, for locations of potential springs and seeps, then identified springs and seeps in the field based on the presence of water flowing or seeping from the ground. All springs and seeps identified were located within wetlands and streams so they are included in the delineation as parts of these features.
2. As you know, in order to have a complete administrative record, we will need the Coalition to provide us with the data forms for the field work. We will need to receive these before the Draft EIS is issued. We are working on providing a submittal of the data forms and will include updated GIS point shape files that correspond to the data forms IDs and locations.
3. Please provide a description of what the "Verified Point" checkmarks and "Negative Point" Xs represent in the map set so that we can correctly characterize these in the EIS or in answer to questions from other agencies or the public. The verified points represent areas where 2014 delineation features were confirmed and incorporated through visual inspection as described in the project's delineation methodology. The negative points are locations that were evaluated through visual observations of vegetation, hydrology, and surface topography and determined not to be aquatic resources. Negative points were recorded at locations with available data identifying potential features (such as NHD stream layer and potential channels on imagery) and features identified in the field

(such as erosional gullies), but were identified in the field as uplands and didn't require a wetland or stream delineation sampling point to make this determination. The vast majority of negative points are erosional gullies, vegetated upland swales, and upland slopes.

4. Several wetlands do not have seem to have paired data plots (i.e. an upland plot and a corresponding wetland plot). An example of this appears on Page 69 of the Whitmore Park Alternative map set in Appendix C. Can you please clarify why some points in the map set do not have a corresponding paired point? In accordance with the project's delineation methodology and the USACE Sacramento District's delineation standards, at least one set of paired data points (plots) was established for each wetland feature or complex. On page 69 of the Whitmore Park Alternative map set there is a single delineation point classified as an out point because at this location a potential feature did not satisfy wetland criteria so it was determined to be upland. Wherever a wetland (or complex of wetland features) was delineated, at least one pair of data points (an upland plot and a wetland plot) was established. In some cases, this means a complex of wetlands (or cluster of similar wetland polygons) has a pair of data plots at one of the wetland features and may have additional pairs or single verification points within the complex area. Additionally, as we've been compiling data forms we've identified a few duplicate points on top of one another and found that some delineation points were not incorporated into our baseline data deliverable so they are not visible on the corresponding map sets. With the submittal of the data forms we will include updated GIS point shape files that correspond to the data forms IDs and locations.

Aside from the data forms, you can send me answers to these questions by email. I do not think additional revisions to the Tech Memo is necessary.

Thank you for your help,
Josh

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From: Keller, Kevin <Kevin.Keller@hdrinc.com>
Sent: Friday, April 3, 2020 2:21 PM
To: Wayland, Joshua <Joshua.Wayland@stb.gov>
Cc: 10145616_7CountyCoalitionUBR TO1 <10145616_7CountyCoalitionUBRTO1@hdrinc.com>
Subject: FW: UBRy -- Waters of the US Baseline Technical Memorandum and GIS files

Josh,

The GIS files have been re-uploaded to the STB Sharepoint site. There must have been an issue with the internet connection when the files were originally uploaded. We re-uploaded the files and double checked these and they seem to have all of the data in them.

General > Waters of the US Baseline Report Final 040320 > GIS Files > AquaticResources_20200403.zip

General > Biological Resources Baseline Report Final 040320 > GIS Files > BiologicalResources_20200403.zip

Kevin

Kevin Keller, PG
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From: Wayland, Joshua [<mailto:Joshua.Wayland@stb.gov>]
Sent: Thursday, April 2, 2020 3:38 PM
To: Keller, Kevin <Kevin.Keller@hdrinc.com>
Subject: RE: UBRY -- Waters of the US Baseline Technical Memorandum and GIS files

Hi Kevin,

I tried downloading the GIS data for the Waters of the U.S. and Biological Resource technical memoranda from the sharepoint site, but it looks like the files are empty. Can you please double check those files to make sure they are complete?

Thanks,
Josh

From: Keller, Kevin <Kevin.Keller@hdrinc.com>
Sent: Sunday, March 1, 2020 10:39 AM
To: Wayland, Joshua <Joshua.Wayland@stb.gov>
Cc: Rogers, Debra <Debra.Rogers@icf.com>; Moelter, Chris <Chris.Moelter@icf.com>; 10145616_7CountyCoalitionUBR TO1 <10145616_7CountyCoalitionUBRTO1@hdrinc.com>
Subject: RE: UBRY -- Waters of the US Baseline Technical Memorandum and GIS files

Hi Josh. Not a problem. We'll get on these right of way.

Kevin

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From: Wayland, Joshua [<mailto:Joshua.Wayland@stb.gov>]
Sent: Friday, February 28, 2020 3:58 PM
To: Keller, Kevin <Kevin.Keller@hdrinc.com>
Cc: Rogers, Debra <Debra.Rogers@icf.com>; Moelter, Chris <Chris.Moelter@icf.com>
Subject: RE: UBRY -- Waters of the US Baseline Technical Memorandum and GIS files

Kevin,

I apologize for sending this late on a Friday, but I wanted to get it to you as soon as I could. As we discussed on our call yesterday, OEA has some additional comments on the revised Waters of the U.S. Technical Memorandum. We would like for you to incorporate these comments into a final version of the memorandum so that we have a complete administrative record of the all the work you've done. Please let me know if you want to set up a call next week to discuss any of these comments.

1. Section 3.0, Methodology, should include a summary of HDR's consultation with the U.S. Army Corps of Engineers on the methodology, as per the methods agreed to with OEA. This should include dates of any consultation with the Corps' Utah and Nevada Section Office (Bountiful Office), as well as the topics of discussion on the methodology and what was changed (if anything) as a result of the discussions.

2. Section 3.0, Methodology, should also discuss functions and values assessments. If there are no available wetlands functions and values methodology for this area of the country (as previously stated by HDR), this should be clearly

identified in Section 3 and a supporting citation should be provided. Section 3 should state that functions and values are discussed generally in the memo.

3. The memo generally mentions seeps and springs as sources for wetlands and aquatic features in Section 5. Please indicate if seeps and springs were or were not identified during the field surveys and, if they were identified, include the appropriate information in both text and GIS.

4. Please include all data forms for the field work, including the data forms in the bulleted list on page 2 of HDR's Uinta Basin Railway: Revised Draft Wetland Delineation Field Methodology dated March 22, 2019. A complete report should include these forms as this report will become part of the administrative record.

5. Section 3.2.1, Wetlands, states the following, "The presence of all three of the criteria is necessary for an area to be designated as a jurisdictional wetland unless problematic conditions or significant disturbance is identified and evaluated in accordance with delineation procedures." Note that all three criteria are required for an area to be designated as a wetland. A jurisdictional wetland is based on Clean Water Act definitions and additional guidance. Please clarify this statement.

6. In Section 3.2.2, Other Aquatic Resources, please provide definitions for playas, canals, open water, and ditches.

7. Section 5.1.1, Wetlands, does not describe any wetland features along the Indian Canyon Alternative between milepost 13 and 21, even though the appendix maps show wetlands and aquatic features in that area, including features that were surveyed. Please complete the narrative in the memo to describe this area.

8. On page 28, under Canals, Ditches and Ponds, the memo states that most canals and ditches are located in either Indian Canyon or the Myton Bench area. Please provide milepost book ends for these areas similar to the way mileposts are used to describe wetland and stream areas.

9. Overall comment for the three alternative descriptions in Section 5 - aquatic resources along each alternative are discussed in segments (i.e., 'from MP X to X'), which is fine and will be helpful in the EIS for a streamlined discussion. However, it is not always clear for each alternative what area is being discussed because mileposts aren't always used and there is overlap between alternatives. Please provide a clear indication of the segments being discussed so this information can be used in the EIS in a similar manner.

10. Section 5.2.1, Wetlands (page 28) suggests that no wetlands were identified between milepost 24 and 80 in the Wells Draw Study Area. Please confirm and correct this statement, if necessary. Additionally, please indicate if wetlands were identified along the segment that splits at milepost 78.25 (in sheet 141 of the appendix maps).

11. Please identify the dominant plant species in the few wetland meadows and emergent marsh meadows that are described on page 29 of the memo.

12. For the text after Table 5-5, please clarify if the discussion covers the area between mileposts 19 and 90 and the segment that splits at milepost 78.25.

13. For the text after Table 5-5, is there any difference in the stream descriptions between Argyle Canyon streams and the streams in the north portion of Wells Draw that are outside of Argyle Canyon? It appears that the terrain outside of Argyle Canyon is much flatter and significantly different. Please provide additional details on the streams to the north, outside of Argyle Canyon as it is lacking in the memo.

14. On page 34 of the memo, please provide the approximate milepost start and end for the canals and ditches identified in the Myton Bench area, as well as the mentioned delineated open water features.

15. In Section 5.3, Whitmore Park Study Area, please provide the approximate milepost start and end to identify the portions of the study area that are unique to this alternative.

16. In Section 5.3.1, Wetlands (the paragraph immediately after Table 5-7), please either describe the characteristics of the wetland meadows specific to the Whitmore Park study area or clearly indicate where to find these wetland descriptions in the Indian Canyon section of the memo.

17. In the text accompanying Table 5-9, please indicate if any of the canals, channels, ditches, and open water impoundments in the Whitmore Park study area are unique to that alternative.

18. In Section 6.1, Jurisdictional Status of Delineated Aquatic Resources, please clarify that the Green River is considered navigable from the mouth, to 20 miles north of Green River Station, Utah (as listed by the Sacramento Corps District).

19. Wetlands and other aquatic resources are mapped well outside of the study areas many locations. Please confirm that these areas are not included in the totals in the memo under Section 5, Results.

20. Please clarify the meaning of “Y” and “M” after some of the mile posts numbers indicate on the map sets in Appendices A, B, and C?

Thank you, Kevin, and have a great weekend.

Josh

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From: Keller, Kevin <Kevin.Keller@hdrinc.com>

Sent: Monday, December 23, 2019 11:44 AM

To: Wayland, Joshua <Joshua.Wayland@stb.gov>

Cc: 10145616_7CountyCoalitionUBR TO1 <10145616_7CountyCoalitionUBRTO1@hdrinc.com>; Mike Mckee <mmckee@7county.utah.gov>; Floyd, Kathryn K. <KKFloyd@Venable.com>; Crawford, Amanda L. <ALCrawford@Venable.com>

Subject: UBRy -- Waters of the US Baseline Technical Memorandum and GIS files

Josh,

We uploaded the Waters of the U.S. Baseline Technical Memorandum, Appendices and GIS files to the UBRy -STB File sharepoint site on Friday. The files are located under Documents\General\Waters of the US-Baseline 122019 folder.

Kevin

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