

Wayland, Joshua

From: Wayland, Joshua
Sent: Friday, February 28, 2020 4:58 PM
To: Keller, Kevin
Cc: Rogers, Debra; Moelter, Chris
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 is it 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>

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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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