

Wayland, Joshua

From: Wayland, Joshua
Sent: Wednesday, March 4, 2020 10:52 AM
To: Keller, Kevin
Cc: Rogers, Debra; Chris.Moelter@icf.com
Subject: UBRY--Paleontological Resource Impact Evaluation Report

Kevin,

OEA and ICF have a few comments on the Paleontological Resource Impact Evaluation Report that was prepared by SWCA on behalf of the Seven County Infrastructure Coalition (see below). The most important of these comments is that we would like SWCA to provide us with the GIS data sets used to prepare the report, including the layers showing the geology and the paleontological localities.

1. Please provide all GIS data sets used in support of the report, including data sets for geology and localities.
2. Under 'Authorities and Standards' on page 8, please add tribal land to the list in the sentence that begins "although the study area crosses state, federal, and private land."
3. Under 'Assessment of Paleontological Potential' on page 10, the report states that paleontological potential was determined using BLM Potential Fossil Yield Classification (PFYC) designations from Foss (2007). We would like to know if SWCA has consulted further with BLM to see if more recent PFYC designation data are available.
4. Also under 'Assessment of Paleontological Potential' on page 10, the report states that SWCA referred to literature and records searches conducted for previous impact evaluations. Please provide citations in this section for the previous impact evaluations that SWCA referred to.
5. On the map in Figure 2 (page 12), it appears that portions of the North Horn Formation (TKfn) are colored yellow, indicating PFYC Class 3. These areas should be colored orange, indicated Class 4, to be consistent with the PFYC designation in Table 1.
6. On the map in Figure 3, we recommend that SWCA list the PYFC designation after each geologic unit in the legend for clarity. Also on that map, the Green River Formation is colored yellow, indicating Class 3, although it is classified as Class 3 to 4 in Table 1. Please indicate if SWCA has consulted further with BLM to verify the correct PFYC.
7. Please confirm the PFYC designation of the Flagstaff formation. Foss (2007) appears to indicate that this formation is Class 3, but it is described in Table 1 as Class 4.
8. Please add the PFYC designations for each formation description in the Literature Review section for clarity.

In order to have a complete record in support of the environmental review, we are requesting that the Coalition provide a revised report addressing these comments. Please feel free to reach out if you have questions or concerns about this request.

Thanks,
Josh

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