

Wayland, Joshua

From: Wayland, Joshua
Sent: Friday, March 15, 2019 3:21 PM
To: 'Brian Barton'; 'Keller, Kevin'
Subject: RE: UBRY - DRAFT wetland delineation methodology summary
Attachments: UBRY DRAFT Delineation Methodology STB Comments.docx

Brian and Kevin,

OEA and ICF have reviewed the draft wetland delineation methodology that was prepared HDR and we have some comments and edits that we would like to see addressed (please see the attached document). I have spoken with Kevin about these changes and we agreed that HDR would send us a final version of the methodology that will address both our comments and any additional comments that may have come out of the consultation with USACE. We would like HDR to provide us with the final methodology before beginning the field work to make sure that everyone is in agreement about the approach. Thank you for consulting with us about the field methods; please feel free to call me at the number below with any questions or concerns.

Best,
Josh

Joshua Wayland, PhD
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From: Brian Barton <Brian@jonesanddemille.com>
Sent: Thursday, February 28, 2019 4:35 PM
To: Wayland, Joshua <Joshua.Wayland@stb.gov>
Cc: Floyd, Kathryn K. <KKFloyd@Venable.com>; MKFawal@Venable.com; Eric Johnson <eric@bcjlaw.net>; 'Mike Mckee' <mmckee@7county.utah.gov>; Michael Hawley <Michael@jonesanddemille.com>; Coalition UBRY <coalition_UBRY@jonesanddemille.com>; Hemphill, Mark <mark.hemphill@hdrinc.com>; Keller, Kevin <kevin.keller@hdrinc.com>
Subject: UBRY - DRAFT wetland delineation methodology summary

Josh:

Please find the attached draft wetland delineation methodology summary, as prepared by HDR. We welcome any comments as we work together to get it right. The fieldwork schedule information will be sent following the meeting with the Corps next week.

Thank you!

Brian Barton, PE
Principal
Jones & DeMille Engineering, Inc.
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Uinta Basin Railway: Proposed Draft Wetland Delineation Field Methodology

Background

This plan outlines the proposed methodology for the collection of the baseline (existing condition) waters of the United States (WOUS) data for the three proposed railway routes (Indian Canyon, Wells Draw and Craig) identified by the Seven County Infrastructure Coalition (Coalition).

HDR plans to conduct field delineation survey of WOUS, along the three proposed selected routes, see Figure 1, within the 2000-foot route corridor. Based on the February 15, 2019 railway alignments, the total route mileage for all three proposed routes is about 370 miles, however there is an estimated 310 unique miles, if we consider overlapping route segments, tunnels, and assume we would not have to survey the existing DPR rail corridor.

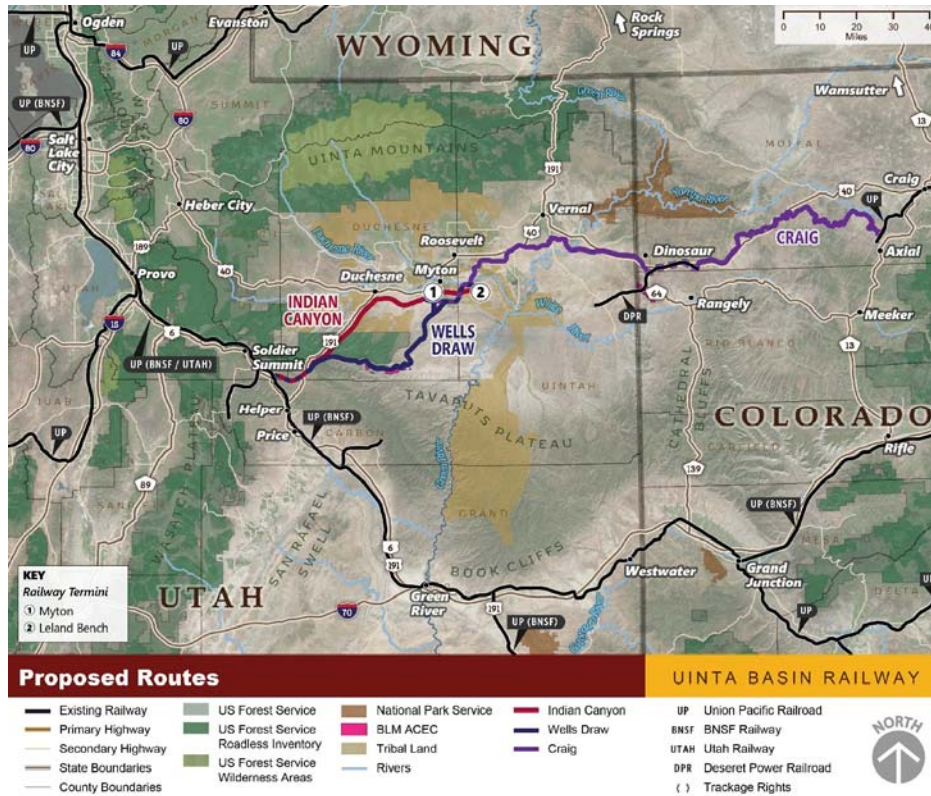
The Surface Transportation Board (STB) will be the lead agency to prepare an Environmental Impact Statement (EIS) working with the project sponsor, Seven County Infrastructure Coalition (Coalition). STB will develop the final set of reasonable and feasible alternatives that will be considered in the EIS during the scoping process. If additional alternatives are identified during the scoping process, delineation would be conducted for those alternatives using methods commensurate with the methods used for the three routes proposed by the Coalition. The wetland delineation work that would be conducted under this plan will support both the analysis in the EIS and Individual Permit Application.

This methodology will first be coordinated with the U.S. Army Corps of Engineers (USACE), Utah and Nevada Section Office and revised, if needed, to reflect USACE comments and discussion topics. The revised methodology will be submitted to the STB for approval, prior to agency consultation.

Commented [WJ1]: Please add language to explain why the 2000-foot study corridor is appropriate here, as this is wider than in previous similar projects that STB has reviewed. Please also note that this study corridor is being developed in consultation with STB and the USACE.

Commented [WJ2]: In order to justify this assumption, please confirm that the proposal would not result in any ground disturbance or in-stream work that could potentially affect water resources within the existing rail corridor.

Figure 1. Proposed Route Alignments



Draft WOUS Delineation Methodology

HDR proposes to conduct field work to identify potential WOUS for the three proposed selected routes, as shown in Figure 1, above.

HDR will conduct delineation fieldwork in accordance with following Clean Water Act regulations and U.S. Army Corps of Engineers (USACE) procedures, and guidance:

- 1987 Corps of Engineers Wetlands Delineation Manual (Environmental Laboratory 1987)
- Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0) (USACE 2008)
- A Field Guide for the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States: A Delineation Manual (Lichvar and McColley 2008) and Updated Datasheet for the Identification of the Ordinary High Water Mark

Commented [WJ3]: Please add language to clarify the proposed methods for delineating wetlands in areas to which field crews will not have access. This could involve reviewing aerial and satellite imagery and reviewing existing wetland and soil maps. If HDR does not provide delineation results for areas that were not accessed during field work, STB will conduct this analysis as part of its environmental review, with the assistance of its independent third-party contractor.

Commented [WJ4]: It appears that portions of the proposed routes are located in areas covered by the Western Mountains, Valleys, and Coast Regional Supplement. That document should be reviewed and followed for those areas. Please also add it to this list of guidance.



(OHWM) in the Arid West Region of the Western United States (Curtis and Lichvar 2010)

HDR will collect field data to delineate aquatic resources (wetlands and other waters such as streams and lakes) within the study area developed in consultation with STB and the USACE route-corridor areas that is adequate to prepare an aquatic resources delineation report in general accordance with the *Minimum Standards for Acceptance* for the USACE Sacramento District. Anticipated fieldwork methods to address these standards are as follows:

- At least one set of paired data points, documented in data forms, for each wetland resource or complex.
- Data points and cross-sections for streams, documented in data forms for ephemeral and intermittent streams.
- Wetlands and other aquatic resources in the survey area will be mapped in the field using an iPad that is linked to a global positioning system (GPS) unit with sub-meter accuracy.
- Site photos of each aquatic resource delineated.

Landscape characteristics across a majority of the three route corridors pertain to the Arid West Region. A portion of the proposed route corridors, through the Roan Cliffs and the West Tavaputs Plateau, can be characterized as mountainous terrain. HDR proposes to use the Arid West supplements (for wetlands and streams) for the entire survey area.

In 2014, HDR conducted aquatic resources delineation surveys for UDOT's Uinta Basin Railroad project. These surveys were never submitted to the USACE for jurisdictional determination, as the project was cancelled. The 2014 surveys were conducted on portions of the proposed routes, covering about 85 miles. HDR proposes to visit the 2014 surveyed areas to verify through visual observation that the hydrology and vegetation characteristics appear consistent with the 2014 delineation survey. Delineation data forms from 2014 would be incorporated for verified aquatic resources. New data forms would be employed to delineate sites with differences from the 2014 delineation survey.

To formally identify delineated aquatic resources that qualify as WOUS, HDR will prepare an aquatic resources delineation report that is adequate to support STB's environmental review and to support a request to USACE for jurisdiction determination to submit to USACE to request a jurisdictional determination. HDR will prepare the report in accordance with the *Minimum Standards for Acceptance* for the USACE Sacramento District.

Commented [WJ5]: Please add language to confirm that the methods used in the 2014 study are commensurate with the methods proposed now. All of the alternatives considered in the Board's EIS must be evaluated using the same level of information, including commensurate methods for gathering baseline environmental data.

Commented [WJ6]: Please note that the jurisdictional determination is not required as part of the STB's environmental review. STB will assess the impacts to all water resources, including both jurisdictional and non-jurisdictional waters. The aquatic resources delineation report should be sufficiently detailed to support both STB's EIS and the USACE's jurisdictional determination and review during the Individual Permit Application process.