

From: Keller, Kevin <Kevin.Keller@hdrinc.com>
Sent: Thursday, January 2, 2020 9:47 AM
To: Wayland, Joshua
Cc: 10145616_7CountyCoalitionUBR TO1; KKfloyd; ALCrawford; Nichols, Karen; Croft, Amy; Perkins, Michael; Warner, Terry; Dobbs, Catherine; Magiera, Doree; mmckee; Rogers, Debra
Subject: RE: UBRY - Biological Resources - Baseline Environment Technical Memorandum and GIS shape files

Hi Josh. I hope that you're surviving the holidays. I'm following up with you regarding the ICF comments on the biological resources baseline report. I didn't see any confirmation that you had received these. Please see our responses below.

Kevin

Kevin Keller, PG
Vice President/Senior Professional Associate

HDR
10450 Holmes Road, Suite 600
Kansas City, MO 64131-3471
D 816.347.1183 M 913.638.2571
kevin.keller@hdrinc.com

hdrinc.com/follow-us

----- Forwarded message -----

From: "Wayland, Joshua" <Joshua.Wayland@stb.gov>
Date: Dec 20, 2019 10:42 AM
Subject: RE: UBRY - Biological Resources - Baseline Environment Technical Memorandum and GIS shape files
To: "Keller, Kevin" <Kevin.Keller@hdrinc.com>
Cc: mmckee <mmckee@7county.utah.gov>, "Floyd, Kathryn K." <KKFloyd@Venable.com>, "Rogers, Debra" <Debra.Rogers@icf.com>, "Moelter, Chris" <Chris.Moelter@icf.com>, "Johnson, David" <David.Johnson@icf.com>

Kevin,

ICF and I have completed our initial review of the Biological Resources Technical Memorandum that you provided on December 4, 2019. We have some follow up requests and questions on the report that will need to be addressed:

1. The included data for the Whitmore Park Alternative appears to be based on a preliminary version of the alignment in the Emma Park area. We are requesting that the report be resubmitted to reflect the final Whitmore Park Alternative alignment, which is located further to the north in the Emma Park Area, including revised maps and revised results (such as acreage of vegetation). Please provide this revised report by January 6, 2020, if possible or indicate when it will be available. [We are targeting January 10th to submit this revised report and shape files with all three 112219 alignments. The old report will be archived on the sharepoint for reference, if needed.](#)
2. Section 5.2 states that riparian habitat, a habitat subsumed by the forest/woodland and meadow grassland communities, was mapped by the survey team to more accurately identify the extent of riparian habitat. However, none of the maps show this specific riparian habitat polygon and there is no corresponding Riparian Habitat layer in the GIS data that was sent. While acres of riparian habitat are provided for the study area, the GIS for Riparian Habitat is needed for the impact

analysis. Please provide these data by January 6, 2020 if possible or indicate when it will be available. We will include the riparian habitat later in the GIS data on January 10, 2020.

3. Please indicate which landcover/habitat types would support the federally listed plants and wildlife species for those species where the report states that suitable or potential habitat exists in the study area. Linking these species to the habitats mapped (and reported in Table 5-1) will be needed, especially for preparing the Biological Assessment. We have the same request for the state, BLM, and USFS species, as well as migratory birds. Ultimately, we will need to know where the species could potentially be found in order to state how much impact could occur to the species and their habitats. Please provide this information by January 6, 2020 if possible or indicate when it will be available. This request will need further discussion between STB, ICF and HDR. In general, HDR does not think it is appropriate to use GAP vegetation data as the sole basis for habitat suitability. GAP/LANDFIRE National Terrestrial Ecosystems data set provides information on the distribution of native vegetation types, modified and introduced vegetation, developed areas, and agricultural areas of the United States. The data set incorporates the Ecological System classification system developed by NatureServe to represent natural and semi-natural vegetation. GAP/LANDFIRE data is often used for creating potential species distribution models as well as conservation planning and management across large geographic areas. For the UBRV Biological Resources Baseline report, the GAP/LANDFIRE data is a useful tool to get a sense of the general vegetation communities and their distribution over the alternative route study areas. However, the GAP/Landfire data is not precise enough to be used solely in the determination of habitat impacts for specific species. Below we will address federally listed analysis separate from state, BLM and USFS species,

For the federally listed plants and wildlife species, the USFWS has provided species-specific habitat polygons representing these potentially suitable habitats for the listed plants and wildlife species, and we will include this analysis in the January 10th updated report, based on the agency provided data. Please note the USFWS does not provide a mapped suitable habitat for Ute-ladies' tresses and we will plan to create a potentially suitable habitat polygon based on field collected data. However, HDR recognizes that more detailed habitat suitability assessments and/or species-specific protocol surveys may be required to support the biological assessment.

For the state, BLM and USFS species and migratory birds, HDR prefers not to use the GAP vegetation data to determine potentially suitable habitat, as it is too broad for species habitat determination. We request an opportunity to further discuss this with STB.

4. The last column of Table 6-4 indicates whether or not potentially suitable habitat is present in the study area. Please confirm whether this conclusion takes into account land ownership. This is important for the species that are listed only on the BLM and USFS species lists (and are not also federally or state listed species) because we will need to know if the identified suitable habitat for those species occurs on BLM and USFS lands, respectively. Please provide this information by January 6, 2020 if possible or indicate when it will be available. This clarification will be included in the updated January 10th report.

5. A few of the map sheets show duplicate photo points. Some duplicate points are adjacent to each other and some are on opposite sides of the study area lines (e.g., Appendix B page 125). Please indicate whether these duplicate points are errors or whether two data points were taken in these areas. Please provide this information by January 6, 2020 if possible or indicate when it will be available. Yes, there may be additional photo points for some areas that we included, due to field crews overlapping survey segment boundaries. We will review these and clarify if and where additional photos are provided. We will check for errors.

Thank you for your assistance with these requests. Feel free to reach out to me with any questions or concerns.

Best,
Josh

Joshua Wayland, PhD
Environmental Protection Specialist
Office of Environmental Analysis
Surface Transportation Board
202.245.0330

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

Sent: Wednesday, December 4, 2019 3:08 PM

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

Cc: mmckee <mmckee@7county.utah.gov>; Floyd, Kathryn K. <KKFloyd@Venable.com>

Subject: FW: UBRy - Biological Resources - Baseline Environment Technical Memorandum and GIS shape files

Josh,

A few information items for you that have been submitted this week.

The Biological Resources –Baseline Environment Technical Memorandum and GIS files are uploaded to the UBRy STB Sharepoint site. It can be found at this link

<https://jonesanddemille.sharepoint.com/sites/Shared%20Documents/Forms/AllItems.aspx?id=%2Fsites%2FShared%2FUBRY%2FSTBNEPAFileShare%2FShared%20Documents%2FGeneral%2FBiological%20Resources%2D%20Baseline%20120319&viewid=246a253f%2D99ac%2D41e7%2D8011%2D1594eec1b488>

under documents/general/biological resources-baseline 120319

Due to the size of the document, the Tech Memo is uploaded as a separate document, the Appendices A-E are uploaded separately. Along with the Tech Memo and Appendices are the GIS shape files.

Also attached is the transmittal email from SWCA to Alan on the cultural resources files.

Both of these items,

Kevin

Please let us know if you have any questions.

Travis Tzioumis

GIS Analyst

HDR
2825 East Cottonwood Parkway Suite 200
Salt Lake City, UT 84121-7077
D 801.743.7857 M 847.922.0190
travis.tzioumis@hdrinc.com

hdrinc.com/follow-us