
From: Keller, Kevin <Kevin.Keller@hdrinc.com>
Sent: Tuesday, March 31, 2020 2:17 PM
To: Wayland, Joshua; Tabachnick, Alan
Cc: 10145616_7CountyCoalitionUBR TO1; Mike McKee; Floyd, Kathryn K.; Crawford, Amanda L.; Anne Oliver; Clayton, Andrea; Magiera, Doree; Klaumann, Anthony; Andreasen, Jennifer
Subject: FW: UBRY--Paleontological Resource Impact Evaluation Report

Josh and Alan,

We have uploaded the revised Paleo Report to the STB SharePoint site below.

[REDACTED]

Also, see SWCA's responses to Josh's email (below in red).

Kevin

Kevin Keller, PG
Vice President/Senior Professional Associate

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From: Anne Oliver [mailto:aoliver@swca.com]
Sent: Friday, March 20, 2020 2:26 PM
To: Clayton, Andrea <Andrea.Clayton@hdrinc.com>; Keller, Kevin <Kevin.Keller@hdrinc.com>
Cc: Nichols, Karen <Karen.Nichols@hdrinc.com>; Suzanne Eskenazi <suzanne.eskenazi@swca.com>; Georgia Knauss <gknauss@swca.com>; Dobbs, Catherine <Catherine.Dobbs@hdrinc.com>
Subject: RE: UBRY--Paleontological Resource Impact Evaluation Report

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.

Hi all-

The revised paleontological report is attached. General responses to STB comments are in red below as well.

Note that the attached file is compressed – image quality looks fine on my screen but if you have any issues we can send the uncompressed file.

Thanks and have a good weekend.

Anne

Anne Oliver
Cultural Resources Director

Please note my new direct number below

SWCA Environmental Consultants
257 East 200 South, Suite 200
Salt Lake City, Utah 84111
D 801.931.2887 | O 801.322.4307 | C 801.889.8095



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From: Clayton, Andrea <Andrea.Clayton@hdrinc.com>
Sent: Wednesday, March 4, 2020 3:44 PM
To: Anne Oliver <aoliver@swca.com>; Keller, Kevin <Kevin.Keller@hdrinc.com>
Cc: Nichols, Karen <Karen.Nichols@hdrinc.com>; Suzanne Eskenazi <suzanne.eskenazi@swca.com>; Georgia Knauss <gknauss@swca.com>; Dobbs, Catherine <Catherine.Dobbs@hdrinc.com>
Subject: FW: UBRy--Paleontological Resource Impact Evaluation Report

EXTERNAL: This email originated from outside SWCA. Please use caution when replying.

Anne and Kevin,

This email is addressed to both of you, I think that may be the quickest way to resolve next steps.

Anne - See comments from STB/ICF on the paleo report below. I know you cannot provide the paleo GIS data to us (item #1) per your email attached.

Kevin – Who at STB should SWCA send the GIS data directly to? Are there more comments on the paleo report that SWCA should expect to receive? Is there a timeline for report revision?

Thanks, Andrea

From: Keller, Kevin
Sent: Wednesday, March 4, 2020 8:53 AM
To: Clayton, Andrea <Andrea.Clayton@hdrinc.com>
Subject: Fwd: UBRy--Paleontological Resource Impact Evaluation Report

See below.

Kevin

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

From: "Wayland, Joshua" <Joshua.Wayland@stb.gov>

Date: Mar 4, 2020 10:51 AM

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. **Geology and locality data was organized in February; and is/was submitted directly to STB.**
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." **Updated as requested. Added the word "tribal"**
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. **SWCA's lead paleontologist checked in with the BLM multiple times in 2019 for updated information, it is in the works, but was not available in December 2019. SWCA lead paleontologist checked in again this month, March 2020, and the BLM has a version that is undergoing internal review, but is not available for use at this time.**
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. **Removed this portion of the sentence. All information used for this analysis for this project was, and is, available in the UGS database and published literature review; that statement is not necessary in the case of this project.**
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. **GIS/map data was updated from Class 3 to Class 4 to reflect the PFYC designation in Table 1. This is the designation in the Excel file provided by Foss 2007 for the Price 100K Map area if TKfn = Flagstaff and North Horn Formations undivided**
- 6a. On the map in Figure 3, we recommend that SWCA list the PYFC designation after each geologic unit in the legend for clarity. **Update made as requested.**
- 6b. 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. **SWCA has not consulted with the BLM at this time for this specific project; as agency consultation was not part of our UBRYSOW for this desktop analysis. For other ongoing projects, SWCA uses the classification provided in Foss 2007; if one is not provided for a specific area/detailed geologic map then the higher class is used. Requests have been made for updated PFYC data, but this is not currently available. The PFYC data, as currently available, is a little confusing as a values were only specified for certain Geologic Map Quads, and the provided values may be associated with a caveat/note that indicates a different value is possible in parts of the mapped area. For the purpose of this project, all Green River units were updated on the map to show as FPYC 3 to 4.**
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. **See comment 5 above, the Flagstaff Formation in the project is combined with the North Horn Formation and they are mapped as one geologic unit; and that unit per the BLM's data in the Price 100K quad area is classified as Class 4. No change made, other than to should the correct PFYC designation on the map as noted above.**

8. Please add the PFYC designations for each formation description in the Literature Review section for clarity. This is not currently standard practice and that is specifically because the PFYC designations are BLM defined, whereas the literature, may at times indicate a different potential. Adding values, or discussion of values here is more appropriate if a suggestion is made to downgrade or upgrade a particular unit's designation.

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

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