

City comment - App3.txt

From: Evelyn Sibbensen [esibbensen@fs.fed.us] on behalf of  
comments-intermtn-wasatch-cache-logan@fs.fed.us  
Sent: Tuesday, July 10, 2007 4:17 PM  
To: comments-intermtn-wasatch-cache-logan@fs.fed.us  
Cc: Mengel, Denny/BOI

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I support the city's project to rehabilitate/replace its culinary water line as proposed.

Russ Aki na  
Director of Parks & Recreation  
City of Logan

*Providing a voice for the voiceless*



June 19, 2007

Rob Cruz, District Ranger  
Logan Ranger District,  
Wasatch-Cache National Forest  
1500 East Highway 89  
Logan, Utah 84321

Dear Rob,

The Utah Environmental Congress (UEC) would like to thank you for this opportunity to review and comment upon the predecisional Environmental Assessment for the DeWitt Pipeline Rehabilitation/Replacement Project proposed action. UEC continues to be an interested party for this proposed action and thanks you for being maintained on the mailing list for this project.

UEC applauds the Forest and other parties for providing a comment period on the EA prior to making any final decisions. This is a smart thing to do and shows that you are involving the public to the extent practicable in the planning for this project. This also has helped to alleviate controversy surrounding this proposal.

This is one of the most detailed and exhaustive Environmental Assessments UEC has ever seen. The CEQ recommends that EAs should be no longer than something like 15 pages, and that EAs extensively longer than that suggest a need to prepare an EIS. The fact that the EA in this case has to be so long and unusually detailed (many EIS's are not as long or detailed) supports our scoping comment that this is a major federal action triggering the need to prepare an EIS. We still think that significance has been reached with this project in terms of both context and intensity. The analysis in the EA indicates this. We still recommend preparing an EIS.

UEC urges the Forest to ensure that the alternative selected does not allow additional dewatering and diversion of spring and other natural waters that currently flow into and contribute to the current flow levels of the Logan River. UEC can not support any final decision that approves additional diversion of water currently naturally flowing into the Logan River.

EA section 2.2.1.5 addresses site restoration. There is no commitment here to use certified weed free native seed mixes. To reduce the significance of the cumulative impacts, and to follow commonly used modern principles of restoration, the EA and Decision Document should be amended to include commitments for the alternative that is actually selected that certified weed free native seed only mixes will be used for all restoration.

We are encouraged to see the mitigation measures in section 2.7.1 for sensitive species. In order to issue a FONSI all populations and habitat for TES plants will need complete avoidance.

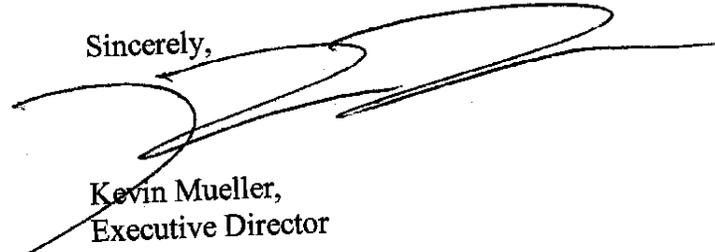
Instead of saying woody vegetation would be removed in the fall to mitigate migratory bird and raptor impacts, we recommend specifying a solid date, such as September 30<sup>th</sup>.

The direction to 'minimize construction in the winter to the extent possible' to mitigate impacts to raptors such as bald eagles, and wintering big game is not sufficient. The action approved must have specific, clear, mandatory and enforceable stipulations and mitigation measures prohibiting construction activities in big game winter range from November through March, and additional specific dates prohibiting winter activities in occupied bald eagle winter habitat areas.

In order to support a FONSI, the alternative selected will need to ensure complete avoidance of any impacts to native cutthroat trout spawning habitat. This means that the proposed action will need further refining and additional mitigation measures.

In conclusion, it appears that an EIS is needed. However, a FONSI could be supported if additional mitigation measures are added to the proposed action that work to avoid impacts that would otherwise occur. There is no reason that this further refining of the proposed action can not or should not occur. We will look forward to learning in the future how this project develops from here. Please mail the UEC hard copies of future Environmental Documents and decision documents for this project.

Sincerely,



Kevin Mueller,  
Executive Director