UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

July 27, 2009

Mr. Ed Woolford,
Environmental Program Manager
FHWA, Utah Division
2520 West 4700 South, Suite 9A
Salt Lake City, UT 84118

Subject: Final Environmental Impact Statement (FEIS) for the State Route (SR) 262 Montezuma Creek to Aneth Project, Navajo Nation, San Juan County, Utah (CEQ # 20080340) (CEQ #20090207)

Dear Mr. Woolford:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the State Route (SR) 262 Montezuma Creek to Aneth Project (Project, Navajo Nation, San Juan County, Utah. Our comments are provided under the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

We rated the Draft Environmental Impact Statement for this project as *Environmental Concerns- Insufficient Information (EC-2)* due to concerns regarding the project's impacts to water quality from erosion and sedimentation. Many of our concerns regarding proposed animal crossings and impacts to wildlife corridors were resolved in the FEIS. Remaining concerns regarding water quality are summarized below.

EPA appreciates that the FEIS identifies existing concerns with undersized culverts and commits to culvert capacity evaluations to determine which best management practices will be employed at each culvert crossing to address capacity, erosion, and sedimentation. The FEIS also commits to monitoring of new drainage structures to verify effectiveness of the crossings. EPA continues to recommend that the Record of Decision (ROD) identify if any of the specific roadway crossings have significant erosion and sedimentation concerns and include proposed measures to reduce increased sedimentation and erosion for these problematic crossings.

Thank you for the opportunity to comment on the FEIS. If you have any questions, please contact Connell Dunning, Transportation Team Leader at (415) 947-4161 or Susan Sturges, the lead reviewer for this project. Susan can be reached at (415) 947-4188 or sturges.susan@epa.gov.

Sincerely,

/s/ Connell Dunning for

Kathleen M. Goforth, Manager
Environmental Review Office (CED-2)

CC: Kim Manwell, Utah Department of Transportation Region 4
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Rachel McQuillen, URS Corporation
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