

FD 33407

EO-7062

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SURFACE TRANSPORTATION BOARD

395 E. Street, SW

Washington, DC 20423

Section of Environmental Analysis

September 19, 2008

Mr. Herb Jones
Director, Government Affairs
Dakota, Minnesota & Eastern Railroad Corporation
140 North Phillips Avenue
Sioux Falls, SD 57104

Re: **STB Finance Docket No. 33407, Dakota Minnesota & Eastern Railroad Corporation Construction into the Powder River Basin: Review Comments, A Level III Cultural Resource Inventory of the Dakota, Minnesota and Eastern Railroad Corporation's Powder River Basin Expansion Project Corridor, PRC Segment 3, Haakon, Jackson, and Pennington Counties, South Dakota Addendum 1-SWCA (LBG-SD3c_Ad1)**

Dear Mr. Jones:

The Surface Transportation Board's Section of Environmental Analysis (SEA) has completed its review of the above-referenced report. We have attached a copy of our written comments to this letter and will be providing you with an interactive spreadsheet (MSEXcel format) via email that includes columns for comment location, reviewer's comments, action taken, and review. Please address each comment provided and specify any textual changes to the report in your response to us by providing an electronic copy of the revised report with "track changes" activated.

Should you have questions as you review the attached comments, please feel free to contact me (Catherine.Glidden@stb.dot.gov; 202-245-0293) or Randy Withrow of the Louis Berger Group (rwithrow@louisberger.com; 319-373-3043). We look forward to working with you on the review of this document.

Sincerely,

Cathy Glidden
Environmental Protection Specialist
Section of Environmental Analysis

Enclosure: Comment Response Form

Level III Cultural Resource Inventory of the Dakota, Minnesota and Eastern Railroad Corporation's Powder River Basin Expansion Project

Corridor, PRC Segment 3, Haakon, Jackson, and Pennington Counties, South Dakota Addendum 1 (SD3c_Ad1) 9/19/08

Comment #	Comment Location in Document					Comment	Name of Reviewer	Action Taken to Address Comment
	Chapter	Section	Page	Paragraph	Line			
1	General					The SAA Style Guide states that simple citations in text should be as follows: Smith 2008. Please delete the comma between the author and the year (e.g., Smith, 2008) throughout the report. No Fieldwork Methodology or Historical Background sections are included in this addendum report. Why? Rather than "sites" in the text and in Table 2.2, shouldn't a more generic term such as "resource" or "property" be used as the historic structures are usually not archaeological sites?	L. Bambrey C. Schoen	
2	Abstract		ii	1	1	Please add the words: 'Dakota, Minnesota and Eastern Railroad Corporation (DM&E)' after "existing."	L. Bambrey	
3	Abstract		ii	1	2	"Pierre to Rapid City" should be placed before the first use of "PRC". Add parens around "PRC".	C. Schoen	
4	Abstract		ii	1	4	Delete 'the Dakota, Minnesota and Eastern Railroad Corporation' and parens but leave the acronym DM&E.	L. Bambrey	
5	Abstract		ii	1	11	Please include site number references in Abstract	Withrow	
6	1	1.0	1-1	2		"Pierre to Rapid City" should be placed before the first use of "PRC". Add parens around "PRC".	C. Schoen	
7	2.0	2.1	2-3	1	1-2	The second and third sentences of the paragraph are confusing. All of the sites in Table 2-2 are either outside the expanded ROW or outside the APE and within the existing ROW?? Please rewrite for clarity and state specifically which sites were within the existing ROW.	L. Bambrey	
8	3.0	3.0	3-1	1	1	Suggest writing "isolated find" in the first sentence for clarity.	C. Schoen	
9	3.0	3.1	3-1	2		Suggested rewording "Site 39JK299 is a sparse lithic scatter consisting of two chipped stone artifacts measuring 1 b 1 m (Figure 3-1)." for clarity. I also suggest that a statement is made that South Dakota classifies nine or less artifacts as an "isolated find" in the next sentence (see Comment 10 below).	C. Schoen	

10	3.0	3.1	3-1 & 3-2	2 & 3		The SD Archaeological Research Center Field Site Form instructions uses the term "isolated find" for resources with fewer than 10 items. To eliminate confusion, suggest using that term (or IF) here and in other places (Abstract and Conclusions) when referring to 39JK299 instead of "isolate" and "site." This comments carries to the site record for JK299 as well.	L. Bambrey	
11	3.0	3.1	3-2	3		SD state guidelines for reports call for an assessment of project effects. Please add a recommendation of <i>no historic properties affected</i> or <i>no adverse effect</i> as appropriate.	L. Bambrey	
12	3.0	3.1	3-2			State the surface visibility to justify pedestrian survey. The site appears to be on a terrace slope of a tributary of Cottonwood Creek near its confluence. What is the potential for buried deposits? Why wasn't any subsurface testing done to look for subsurface artifacts or features as well as to document the site stratigraphy?	C. Schoen	
13	4.0	4.0	4-1	1	1-6	The first three sentences of the paragraph are somewhat redundant. Please condense to two sentences so that the reader understands that the ROW was expanded and that only 14 of the 16 areas (with linear measurements) were surveyed.	L. Bambrey	