

RE: follow up
Catherine Glidden
to:
shina.duvall
08/08/2012 08:11 AM
Cc:
doug.gasek, richard.starzak, naveckyd
Hide Details
From: Catherine Glidden/STB

EO-1937
CG

To: shina.duvall@alaska.gov

Cc: doug.gasek@alaska.gov, richard.starzak@icfi.com, naveckyd@stb.dot.gov

Hi Shina,

Well, I think it would be odd to provide an opinion simply based on a segment (an artificial construct created for engineering purposes, I presume). I think this only makes sense in regards to the reports that the AKRR has been generating (per segment), and the work that they have been doing (per segment). We would respond to the information that is provided as it comes in. Thus, we would provide our opinion on each reported result from any survey work conducted. That AKRR has chosen to conduct their surveys and their reporting segment-by-segment. This would be the only reason we would then apply the criteria of effect and comment on any potentially eligible resources within a particular segment. Otherwise, providing a separate effect finding per segment would seem odd.

I am a bit puzzled by this. If the AKRR wanted to conduct their surveys in a different manner, then we could have flowed with this. However, they have chosen to conduct their work and their surveys segment-by-segment. I am assuming this has been done in order to compliment their work schedule.

We are only responding to the process that the AKRR and Working Group (I presume) has come up with.

All the best,

-Cathy

Catherine Glidden
Environmental Protection Specialist
Office of Environmental Analysis

Surface Transportation Board
Washington, DC 20423
(202) 245-0293

-----"Duvall, Shina A (DNR)" <shina.duvall@alaska.gov> wrote: -----

To: "Catherine.Glidden@stb.dot.gov" <Catherine.Glidden@stb.dot.gov>
From: "Duvall, Shina A (DNR)" <shina.duvall@alaska.gov>
Date: 08/07/2012 03:39PM
Cc: "Gasek, Douglas F (DNR)" <doug.gasek@alaska.gov>, "richard.starzak@icfi.com" <richard.starzak@icfi.com>
Subject: RE: follow up

Cathy,

My apologies - It sounds like I may have inadvertently caused some confusion. If it would help, we can discuss this over the phone. However, I'll try to clarify some items here:

Of course, we appreciate STB soliciting our opinion on the eligibility of any resources that are encountered during survey. Thus far, for the segments that have been surveyed, we have been comfortable with the determinations of eligibility made: assuming eligibility on site TYO-276 encountered during survey the 2011 survey and assuming eligibility on the bridge recorded during the survey of Segment 6. We have also concurred with the DOEs made for other resources encountered (not eligible).

We are not suggesting it would be appropriate to assume an adverse effect on every eligible resource. I apologize if I created any confusion on this issue.

We agree that a determination of eligibility (even if assumed) should be made for each resource. If STB wishes to make a finding of effect for each segment inventoried, that is the lead agency's decision. We will provide our comments (concurrence/objection) accordingly.

We are also comfortable with a letter report for each segment inventoried that includes methods, results, and recommendations. We understand that one final comprehensive report will be prepared upon completion of all survey.

Thanks – hope you are having a good week!

Shina

Shina duVall, RPA

Archaeologist, Review and Compliance Coordinator

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shina.duvall@alaska.gov

From: Catherine.Glidden@stb.dot.gov [mailto:Catherine.Glidden@stb.dot.gov]

Sent: Tuesday, August 07, 2012 7:24 AM

To: Duvall, Shina A (DNR)

Cc: Gasek, Douglas F (DNR); Richard.Starzak@icfi.com

Subject: RE: follow up

Hi Shina,

I guess I feel that it would be helpful to have your opinion, as the state experts, on the eligibility of any particular resource that the AKRR and its consultants encounter during their surveys. I have no experience with Alaska resources, per say, and will thus need to rely entirely on the opinion of our consultants for any determinations of eligibility if this is how you intend to proceed with this project.

If you wish to assume an adverse effect on every eligible resource, that is fine with me. Obviously, the type of adverse effect would depend on the location of the historic resource in relation to the impact area (direct, indirect, visual). However, if that's how you prefer to go, we will just make the call without your input.

Also, I am much more comfortable deciding on eligibility and effect for each resource and each segment rather than making a wholesale decision about the project as a whole. The PA was created because there was a likely possibility that the project would have an adverse effect to historic properties, then lays out the stipulations that would apply in the event adverse effects to known or newly identified eligible resources is in fact going to occur based on the project's current design.

The process for the AKRR to lay out its results is really quite simple. Each report can reference sections of other reports that has the full compliment of background research, context and other sections that would otherwise be needlessly repeated. The report then would only lay out the

field methods, what was found, and eligibility recommendations along with any likely effects. We already agreed that survey work for the Iditarod Historic District need not be repeated and need only be summarized in a letter. I don't, however, like the idea of creating addendums to reports. Rather, I prefer keeping the results of each segment separate (even if there is only a letter report for that segment). This keeps things organized and clean.

You can then send your concurrence in an email. That would be sufficient. Otherwise, we will assume concurrence. Does this sound reasonable?

Let me know if I have understood you correctly as described above.

I understand that you are very busy...

Thanks for the well wishes.

-Cathy

P.S. I used to work at FHWA Headquarters with MaryAnn Naber...:)

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-----"Duvall, Shina A (DNR)" <shina.duvall@alaska.gov> wrote: -----

To: "Catherine.Glidden@stb.dot.gov" <Catherine.Glidden@stb.dot.gov>
From: "Duvall, Shina A (DNR)" <shina.duvall@alaska.gov>
Date: 08/06/2012 03:21PM
Cc: "Gasek, Douglas F (DNR)" <doug.gasek@alaska.gov>
Subject: RE: follow up

Hi Cathy,

First, I am very sorry to hear that you have been ill and in the hospital. I hope things are improving. Please

let me know if there is anything we can do to ease your burden on this project.

Regarding our recommendations, we are comfortable with the report as it stands, given the revisions that were made following our most recent telecon. Regarding a finding of effect, we have generally felt (and expressed to Barb and the rest of the Working Group) that it might be cumbersome and confusing to have a separate finding of effect for each segment that is surveyed for archaeological resources. Our reasoning for this is that the overall project already has a PA in place and we know that the undertaking will have an adverse effect on the Iditarod Dog Sledding Historic District and perhaps other as-yet unidentified resources, so we generally prefer to have one finding of effect for a project. However, I know that some transportation agencies (e.g., I've seen it with FHWA) do issue a separate finding of effect for different segments/phases of a project.

It is certainly up to STB whether you wish to issue a separate finding of effect for this segment and subsequent ones as they are inventoried. However, we are comfortable with concurring on eligibility assessments and stating that we have no objections to moving forward with project-related activities in the particular segment in question. I guess this decision may not be one of great consequence either way...

Please let me know if that made any sense at all... ☺ And thanks again for all your help and work on this project.

Best regards,

Shina

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From: Catherine.Glidden@stb.dot.gov [mailto:Catherine.Glidden@stb.dot.gov]
Sent: Friday, August 03, 2012 4:26 AM
To: Duvall, Shina A (DNR)
Subject: Re: follow up

Hi Shina,

Not that busy. I just have been in the hospital since Monday and have been ill.

Regarding my comments to her: I just said that I would need to have both her recommendations and yours prior to making a decision on eligibility and effect. That was it.

-Cathy

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-----"Duvall, Shina A (DNR)" <shina.duvall@alaska.gov> wrote: -----

To: "Catherine.Glidden@stb.dot.gov" <Catherine.Glidden@stb.dot.gov>
From: "Duvall, Shina A (DNR)" <shina.duvall@alaska.gov>
Date: 08/02/2012 07:25PM
Subject: follow up

Hi Cathy,

No rush – but when you find a free moment, I would love to take 15 minutes of your time to chat about PMRE. I understand you recently spoke with Barb and she asked me to follow up with you to discuss the next steps for the Segment 6 report and also whether a finding of effect should be made on the bridge.

I know you're busy, so we can connect at a time that is convenient for you.

Best regards,

Shina

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