

STB Finance Docket 33407

Forest Service Comments for DME report: **Request for Review and comment on 21 Archaeological Sites**

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Report Review

- a. Having had our archaeologist participate in some of the on-the-ground reviews of the sites with the tribes, it was apparent that site boundaries were expanded and more features were found on several sites. The submitted evaluation also mentions these additional findings (like page 8, paragraph 4, 48CA211). However it is difficult to review the eligibility for the sites without updated site forms that show the new features. These updated site forms would need to be complete with sketches that show feature details and site relationships, photos of features, and the like; while maintaining the confidentiality of key information requested by the tribes. We'd like to review these eligibility determinations with updated site forms in hand.
- b. Criterion A is mentioned for several sites, but TCPs are rarely mentioned. Is there a specific reason more sites aren't being considered as TCPs?
- c. Several sites were tested in the past and showed no buried deposits (48CA1406/1719 for example). We have recommended that key landforms be tested with magnetometer for while they may not contain buried living surfaces, they may indeed contain buried hearth features with Criterion D information. Several of these 21 sites are appropriate for magnetometer testing/mapping as we have previously requested.
- d. Sites with rock art features/petroglyphs: The updated site forms for these sites need to include sketches and photographs of the petroglyphs as well as accurate sketch maps so the panels can be relocated when sites are visited.
- e. The Criterion D arguments for information about historic tribal spirituality and potential to serve as an educational tool are intriguing and there may need to be further discussion between the Tribes and PA signatories to help non-tribal folks reach an informed understanding.
- f. Adverse Effects: we agree that the project would have adverse effects to all the determined eligible sites if it is concurred that they are eligible.
- g. To make our complete review, we need updated site forms for the sites. We still request magnetometer surveys of sites on appropriate landforms.