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October 14, 2014

Ms. Victoria Rutson
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Re: Cultural Resources [REDACTED]

Dear Ms. Rutson:

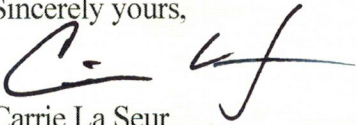
This letter concerns cultural resources identified [REDACTED] just north of Ashland, MT in ICF's June surveys that apparently were not recorded. Kitte Coffin was present in June 2014 when Northern Cheyenne representative James Walks Along discovered a [REDACTED] site on top of a butte overlooking the proposed Tongue River Railroad ("TRR") route adjacent to the Tongue River [REDACTED]. The attached map marks the approximate location of the site with a red dot.

The Coffin family believes that the site was not recorded as part of the cultural survey because it was more than 200 vertical feet from the proposed route on the valley floor and therefore considered outside the ROW. However, they point out that the land between the [REDACTED] site and the railroad is mostly a steep vertical rise that will likely require a major cut into the butte for the railroad to be built with sufficient clearance above the flood plain for safe operation. Making such a cut and grading it to meet safety standards would likely impact, if not destroy, the [REDACTED] site itself. For this reason, we request that ICF reconsider its exclusion of this site. A better engineering analysis of the proposed route will be necessary to determine whether or not the [REDACTED] site is outside the required ROW.

We have expressed concerns in previous correspondence that building the railroad through the meandering, frequently flooded Tongue River valley will require major cuts into land forms along the way, resulting in a much wider ROW than anticipated, with associated expanded impacts. This is only one example. We remain very concerned that the lack of detail provided by TRR to date is impeding a complete study of potential impacts.

[REDACTED]

Sincerely yours,


Carrie La Seur

cc:

Conrad Fisher

Shannon Johnson

Richard Starzak

James Walks Along

Stan Wilmoth

Attachment