



Re: PMRE 2011 Archaeological Survey Report

Barbara Hotchkin

to:

Catherine.Glidden

02/14/2012 06:49 PM

Cc:

"Brian Lindamood", "Judy Bittner", shina.duvall, "Summer Rickman",

Elizabeth.Grover, Vicki.Rutson

Hide Details

From: "Barbara Hotchkin" <Hotchkinb@akrr.com> Sort List...

To: <Catherine.Glidden@stb.dot.gov>

Cc: "Brian Lindamood" <LindamoodB@akrr.com>, "Judy Bittner" <judy.bittner@alaska.gov>, <shina.duvall@alaska.gov>, "Summer Rickman" <summer.rickman@alaska.gov>, <Elizabeth.Grover@hdrinc.com>, <Vicki.Rutson@stb.dot.gov>

History: This message has been replied to.

RESENDING email from 2/10/12 with additional thoughts based on Catherine's voice mail message this morning.

Thanks for your message this morning -- sorry I missed your call. We look forward to getting your comments on the report on Thursday and discussing them on Friday. I am surprised that you and Shina believe it is too late to be eliminating the haul road from the APE and the report at this point, and that it should be assumed eligible for the National Register. The PA and MOU allow for revisions to the APE based on project design, and the MOU allows for identification, evaluation, and treatment/mitigation efforts to be conducted by project segment/component as segments/components are to be constructed.

First, a little history on the haul road. It was included in the APE because ARRC and MSB thought that it might be needed during Phase 1 construction planned for 2012. However, once the construction contractor was selected and he had an opportunity to develop his plans for Phase 1 construction, he decided that construction of the proposed haul road is unnecessary for the 2012 construction season, and may never be needed for Phase I construction. Thus, it truly is not part of the APE as there are currently no plans for the project to impact that

EI-18824

CG

area. Per the PA, a determination of eligibility would only be required for potential historic properties that are within the APE.

If the depressions found along the Haul Road are indeed aboriginal cache pits, we believe the site could potentially be eligible for the National Register, but that more information would be needed to make that determination. We can't gather further information until after the snow melts and the ground thaws (likely late May in this area). If you choose to assume the haul road is in the APE, consistent with Section IV.B of the PA, "if a potential historic property is identified in the final APE, and the STB and SHPO agree it is eligible for the NRHP, the STB will consult with the Signatories, Invited Signatories, and Concurring Parties to seek way to avoid, minimize or mitigate adverse effect." This suggests to me that STB and SHPO can assume the site eligible for the NRHP for the purposes of making a determination of effect, and the Working Group does not have role in that assumption. The appropriate finding of effect would be "no adverse effect" relative to this site, as ARRC and MSB will ensure that it is fully avoided by construction activities during 2012.

I also want to point out with another potential issue with assuming the site is eligible for the NRHP. PA Stip. IV.A states that STB makes the determination of eligibility and effect including boundary delineations for the historic property within the APE, submit this to SHPO for a 30-day review/concurrence period, incorporate SHPO comments, and submit to PA parties for 15-day review and comment period. I don't think we can provide you with sufficient information to do this for a boundary determination without collection of additional information. And the timing for reviews may create additional concerns.

We recommend that the Working Group conduct further investigation at this site in 2012 and obtain the information necessary for a determination of eligibility and boundary determination in the event that subsequent construction phases reconsider construction of the previously proposed haul road. However, in an effort to not hold up project activities in areas that were surveyed and no cultural resources were identified, we recommend submitting results of the Haul Road survey and the determination of eligibility for the discovered site as a separate report following the additional investigations.

We look forward to discussing this further on Friday. Thanks, Barb

Cathy and Shina,

We are looking forward to working with you on the draft 2011 Survey Report. We think it would be beneficial to have a call to discuss your thoughts early next week. We are pleased to take on the responsibility to revise the report and plan to begin some initial edits right away. We would appreciate your thoughts on the following approach.

Proposed Approach – ARRC, with assistance from HDR, will:

1. Review and edit the report to correct grammatical errors and improve overall organization and readability
2. Remove information regarding the Haul Road survey and discovery of the possible cultural feature from the report. The report will only include discussion of the surveys for Segment 1 and the Section 6 Borrow Area and recommendations for no additional surveys in Segment 6 (due to previous surveys and heavily disturbed area/existing ROW). This approach is consistent with the Working Group MOU, which acknowledges in Section 5(K)(1) that reports may be submitted as surveys for each project segment/component are completed. Our ongoing consultation with SHPO as we were preparing the draft report did not lead us to believe that keeping the information on the access road and findings in the report would be a concern since the Haul Road survey is not part of the APE, but since it seems to be creating problems, we will remove it.
3. Address any additional comments provided by STB and SHPO on the draft report submitted on January 26, 2012
4. Submit the final report (covering survey results for Segment 1 and the Section 6 Borrow Area) in accordance with the PA and MOU, with a revised cover letter seeking approval to proceed with construction in Segment 1, the Section 6 Borrow Area, and Segment 6.