

From: Ian Ritchie [iritchie@fs.fed.us]
Sent: Monday, March 24, 2008 5:57 PM
To: Bibler, David
Cc: Ian Ritchie
Subject: Fw: Report Review for Wyoming

Dave,

My comments from before seem to still be relevant: forwarded message below and also my previous letter regarding the E-W line in Wyoming, key comments in that letter apply to the entire route: i.e. comments on the survey of only a portion of the APE, etc.

For sites needing tribal consultation we still are unable to make an agency determination on eligibility until tribes have responded.

For 48CA3781, while I realize the potential for graves is a difficult topic, the site form should spell out why this particular site is seen as having the potential for burials, when there are few such sites known in this area. Is it feature types or the presence of rock art? Are certain parts of the site likely to contain such locales and other areas unlikely?

The site form should spell out why the recorders avoided testing the site.

I can work up a formal letter for our comments, but I'm trying to meet your timeline for review. For the SD side we still need a hard copy of that report and some time for review.

I'm a bit surprised that every photo is labelled "image has not been altered". Couldn't there be a statement that "no photos have been altered unless otherwise stated"? Is this a standard from another State that has been applied to this report? It simply appears to add to the paper being used and the bulk of the final report (and perhaps a shrinking of the image size).

Thanks,

Ian

----- Forwarded by Ian Ritchie/R2/USDAFS on 03/24/2008 04:40 PM -----

Ian
 Ritchie/R2/USDAFS

12/14/2007 10:44
 AM

"Bibler, David"
 <dbibler@louisberger.com>

To

cc

Ian Ritchie/R2/USDAFS@FSNOTES,
 Michael.Madson@hdrinc.com

Subject
 TRC report on N-S portion of line
 in Wyoming(Document link: Ian
 Ritchie)

Dave,

HDR sent us a compendium report for National Forest System lands in Wyoming and SD. This morning you mentioned that you are reviewing a Wyoming report by TRC, presumably the N-S line. I have some draft comments on the N-S segment and they follow here. Please note that the sites mentioned in the text below are on the N-S route:

"We have received the summary report for the DME PRB Expansion Cultural Resource Inventory on National Forest System (NFS) Lands in SD and WY.

The report contains a thorough summary of the cultural resource findings to date along the proposed rail line on NFS Lands. There are some information gaps that should be filled for final reporting and some additions if this report is to be used in SHPO consultation for test boring projects.

For sites having rock art and historic inscriptions, like 48CA1862 and 48CA3781, there need to be sketches or enhanced photos detailing the inscriptions since the inscriptions cannot be made out from the photos in the report. For example, from a brief review at a minimum of 48CA3781, features 9, 18, 19 and 25 in the report for 48CA3781 do not have transcriptions or sketches. For another example, Feature 5, an historic inscription, needs a drawing showing the inscription and incised border (because the inscription is more than the words, but is also graphic representation of the author that includes not only the text style but elements of design).

Also the Tables for 48CA3781 are confusing. Tables 13-15 are listed as descriptions of prehistoric features and some discussions follow using those feature numbers, next Table 20 says it is a feature description for the entire site, in which it appears that features from Tables 13-15 are renumbered and then subsequently discussed. The Tables needs to be clearly labeled as to if they are current feature numbers or previous recording feature number, or perhaps a differentiated feature number system should be used for the recent recording so there is no confusion in site form and report discussions whether the feature number being discussed is from from the two recordings.

Also the report does not clearly demonstrate which features/portions of sites will be affected by railroad construction. For example which features of 48CA3781 will be directly impacted by railroad construction and the ROW fence? Perhaps a shaded sketch map showing which portions will be inside the proposed ROW fence would be useful. Lastly, what are the effects to the remaining portions of the site?

On the sketch maps, is the ROW only shown on sites recommended eligible for the NRHP? For examples, the sketch maps for 48CA6504 as well as 48CA3655 (and others) appear to show the centerline of the proposed route but do not show the width of the ROW (page 220 and others) and one cannot tell from the sketch if the site will be impacted or destroyed by railroad construction.

If this report is intended to assist with SHPO consultation on permit applications for preliminary studies, there will need to be additions. For Wyoming the State project summary table and site summary tables will need to be part of the report."

Mike - I'm including you as a cc on this message to get the comments to you quickly - I'm still waiting to see if the Nebraska (Buffalo Gap NG) has additional comments - so I'll get the letter out to you in January if there are further comments. I'm out from this afternoon until Jan 7.

If either of you do need to reach me in the next 3 weeks, you can ring my cell at 307-760-4524

Thanks,

Ian



United States
Department of
Agriculture

Forest
Service

Medicine Bow - Routt National
Forests and Thunder Basin
National Grassland

FI-3143 CG
Douglas Ranger District
2250 East Richards Street
Douglas, WY 82633-8922
<http://www.fs.fed.us/r2/mbr>

WY1

File Code: 2360-2

Date: October 2, 2007

Catherine Glidden
Environmental Protection Specialist
Section of Environmental Analysis
Surface Transportation Board
Washington, DC 20423

Dear Ms. Glidden,

The Forest Service has reviewed the Draft Report for Segments 1 and 2 by TRC Mariah for the STB PRB Expansion (Docket No. 33407) and this provides our comments:

1. The report notes that the work done was only for the ROW corridor and does not address indirect effects in the rest of the Area of Potential Effect (APE). As a result our comments are limited to the subset of the APE described in the report. We look forward to taking part in the development of how the remainder of the APE will be addressed.
2. Does the route surveyed match the final design plans, or is the route immutably fixed?
3. We look forward to a chance to review the report once tribal consultation has been taken into account. For example consideration of the eligibility of 48WE1280 may be clarified based on the results of tribal consultation.
4. We concur with the evaluation of 48WE1080 and will be interested in the development of mitigation measures (treatment).
5. The report maps show several sites, 48WE1075, 48WE1076 and 48WE1079 for example, which are not addressed in the report. What is the status of these sites?
6. We provisionally concur with the remaining determinations of eligibility, pending a field visit of two sites (48WE1347, 48WE1349) and the results of tribal consultation.

Sincerely,

/s/Misty A. Hays
MISTY A. HAYS
Deputy District Ranger

