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Wyoming State Parks & Cultural Resources

EI-18051

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January 28, 2010

Catherine Glidden
Section of Environmental Analysis
Surface Transportation Board
395 E Street, SW
Washington, D.C. 20423

re: DM&E Railroad, Geomorphological Assessment of Archaeological Sensitivity Along the Powder River Basin Expansion Project - Wyoming Segments (Docket No. 33407) (SHPO File # 0498RLC044)

Dear Ms. Glidden:

Thank you for consulting with the Wyoming State Historic Preservation Office (SHPO) regarding the above referenced project.

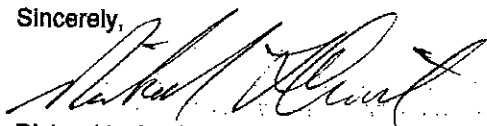
We have reviewed the document and find that it partially fulfills the requirements of Attachment A, Stipulation 3.4.5 of the Programmatic Agreement (PA) guiding this undertaking. It is our recommendation that the requirements which remain be addressed in the "Proposal for the Identification and Evaluation of Deeply Buried Archaeological Sites Along the DM&E Powder River Basin Expansion Project New Build Segment in Wyoming and South Dakota" (Identification Plan). Specific to Attachment A, Stipulation 3.4.5 of the PA, the Identification Plan should include:

- A map/maps of the entire Wyoming build route illustrating where "buried cultural resources may exist and where deep testing may be necessary to identify cultural resources". While the Geomorphological Assessment discusses high, moderate and low sensitivity areas at core/profile locations, it fails to apply this information to the actual build route. It also fails to address where deep testing may be necessary.
- A discussion/evaluation of the results of the Geomorphological Assessment and its ability to "assist in evaluation of cultural resources against NRHP eligibility criteria (36 CFR 60.4) by providing identification of the soil(s), soil characteristics, soil dating, and analysis of the probability of the soils to contain cultural material". Based on the results of this evaluation, and the potential for buried cultural resources, a testing program at known site locations may need to be incorporated into the Identification Plan.

If the Identification Plan cannot address these issues, this Geomorphological Assessment will need to be revised to do so prior to the development of the Identification Plan.

Please refer to SHPO project #0498RLC044 on any future correspondence regarding this project. If you have any questions, please contact me at 307-777-5497.

Sincerely,



Richard L. Currit
Senior Archaeologist



Dave Freudenthal, Governor
Milward Simpson, Director