

March 19, 2014

VICTORIA RUTSON
OFFICE OF ENVIRONMENTAL ANALYSIS
SURFACE TRANSPORTATION BOARD
WASHINGTON D.D. 20423

Re: Docket No. 30186 Tongue River Railroad Company Project Updates (03/012/14)

Dear Vicky:

Thank you for the project updates. As part of the update package you request our comments on five areas:

- 1) We do not know of other appropriate consulting parties at this time,
- 2) We believe the preliminary APE is appropriate – with the common sense proviso that some properties and or effects may need wider consideration. That may in particular apply to properties of cultural or religious significance to tribes, and of course to Districts if they extend beyond the preliminary APE. We are not privy to knowledge of specific tribal properties to which this caution may apply,
- 3) We support the ongoing identification effort and continue to applaud the effort to get a good look at each alternative. I have requested ICF to let us know the percentage coverage to date of each alternative and have been told they are working in that information. As stated at the Billings meeting in so far as the identification of cultural resources is to inform the selection of the route then as much up front inventory as possible is desirable. And some assessment of eligibility whether it is preliminary or otherwise will be useful. Obviously the regulations do not require 100% identification, particularly where there is a PA, but it will, in our opinion, be useful in making and justifying a route choice (if cultural resources are seriously in the mix of considerations),
- 4) We don't really have the details to assess the field work to date, but have much confidence,
- 5) We believe there has been a sea change in the level of effort to involve Tribes, and applaud that effort and the results to date. As with inventory, more is always better.

Thank you,



Stan Wilmoth, Ph.D.
State Archaeologist/Deputy, SHPO

225 North Roberts Street
P.O. Box 201201
Helena, MT 59620-1201
(406) 444-2694
(406) 444-2696 FAX
montanahistoricalsociety.org