

**Port MacKenzie Rail Extension**

Catherine Glidden to: Bittner, Judith E (DNR)
Cc: Shina A (DNR) duVall

02/10/2012 09:10 AM

From: Catherine Glidden/STB
To: "Bittner, Judith E (DNR)" <judy.bittner@alaska.gov>
Cc: Shina A (DNR) duVall <shina.duvall@alaska.gov>

Dear Judith Bittner:

I am writing you on behalf of the Surface Transportation Board's Office of Environmental Analysis. I am currently the contact at the Board regarding Section 106 compliance for the above noted project.

I would like to request from you copies of any guidance documents that you may have regarding reporting and survey standards at the AK SHPO. I note from the MOU created for this project, that all reports shall meet Alaska Office of History and Archaeology (OHA)/SHPO requirements for reporting (as well as the SOI standards). Could you send me a copy of your requirements or direct me to a web site where I can download them? I would also like copies of any other documents from your office that might be helpful for me to have in hand as the project proceeds.

I am currently reviewing the 2011 Port MacKenzie Rail Extension Project Survey Report and have a number of concerns about the document. As such, I would like to know if the AK SHPO has specific requirements for survey reports that could guide me as I prepare my comments. I am concerned, for one, that the cache depressions (TYO-00276) that were identified by the survey crew (historical, but aboriginal..) should be formally evaluated despite the report's claim (noted at the very end of the report) that the Haul Road would likely not be affected. The conclusions section also notes that "the Project Team" would determine next steps on eligibility in consultation with the SHPO. This does not comport with my understanding of the Section 106 process which leaves eligibility determinations in the hands of the Federal agency in consultation with the SHPO.

I am still reviewing the document and will minimally recommend that the Matanuska-Susitna Borough revise the document and prepare another draft for our review due to multiple grammatical, formatting and content issues. As such, if you have any comments on this draft report, could you direct a copy to me?

Thank you!

-Cathy

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