

STB Finance Docket 33407
SD3bForest Service Comments for DME report: **Level III CRE DME PRB Expansion
Segment 2, Haakon and Stanley Counties, SD**

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Report Review

- a. The Interpretation and Recommendation for at least two sites, 48HK129 (page 5-85) and 48HK129 (page 5-88) contain the following statement:

“However, the alluvial fan on which the site is located may warrant a geomorphic assessment to determine whether it may contain deeply buried cultural deposits.”

Perhaps the determination of eligibility should wait for the geomorphic assessment and they should be considered unevaluated. The portions of these sites reported in this document may well be non-contributing, but the site may still be eligible if archaeological deposits are indeed buried in the alluvial fan.

Perhaps these sites should be added to the areas to be addressed by the buried site strategy currently under development and review to determine site eligibility.

- b. Table 6-4 lists sites that are unevaluated (39HK76, 39HK112 and 39ST306 for example) but lists that the project will have an Adverse Effect. It sounds as if they are in fact considered eligible. This should be spelled out clearly. The other unevaluated sites list Unknown Effect.
- c. 39HK76 says that Criteria A and D apply to the site but that it is unevaluated for the NRHP and that tribal consultation and architectural review (Criterion C) is needed (page 5-128 and page 6-4). Is that consultation needed to determine eligibility under another criterion? Perhaps it should be considered eligible under A and D and unevaluated under other Criteria? I'll gladly defer to SD practice, but the site is recommended eligible under Criteria A and D by the recorder.
- d. Table 6-4 (page 6-7) has what may be typos, or perhaps reflects a change in eligibility recommendation since an early draft for Site 39ST359. The table says the project will have no adverse effect, lists Criteria A and D, but says the site is ineligible. The table should be corrected to match the report recommendations and the site form.
- e. In Table 6-4 (page 6-7) entries for site 38ST360 need similar corrections.
- f. It is refreshing to see what direction the report addresses the project, reporting results from East to West. The Visual Assessment report reported W to E, the

Buried Site Strategy E to W, the SD Geoarch/Geomorph W to E ...if I've managed to keep them all straight.