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STATE OF WASHINGTON

**DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION**

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August 20, 2008

Ms. Christa Dean  
Section of Environmental Analysis, Surface Transportation Board  
1925 K Street NW  
Washington, DC 20423-0001

In future correspondence please refer to:

Log: 041007-02-STB  
Property: STB Docket No. 34936, Northern Columbia Basin Railway Project  
Re: Review Comments

Dear Ms. Dean:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP) and providing a copy of the report entitled, *Northern Columbia Basin Railroad Project: Draft Cultural Resources Discipline Report*, completed by Jones and Stokes. The Northern Columbia Basin Railway project report has been reviewed on behalf of the State Historic Preservation Officer under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. The following comments represent the combined comments of myself and Mr. Russell Holter, Built Environment Compliance Reviewer for DAHP. Our combined comments on the report are presented in no particular order.

- There is no accompanying electronic data for the historic property inventory forms.
- There is no mention of the railroad alignment itself as either a historic property or an archaeological resource. The age of the line would certainly warrant its consideration as a historic resource, yet no mention was made of its eligibility or potential impacts that might result from this undertaking.
- We will not be able to entertain an effect determination until those properties that were not evaluated as part of this study are evaluated for potential effects that might result from this undertaking. Until these access issues are resolved or dealt with programmatically, we will not be able to entertain any effect determination.
- Please justify the paucity of subsurface archaeological testing for this project. Much of the proposed alignment appears to fall within undeveloped land or land under agricultural development only. Please explain why additional testing was not conducted in these areas.
- Figures located on pages 2-15, 2-17, and 2-19 have no captions, legends, or other identifying information. The figures located on pages 2-17 and 2-19 are not listed in the front matter.



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*Protect the Past, Shape the Future*

Thank you for the opportunity to review and comment. We look forward to your continued oversight of this project and await additional information and determinations of eligibility and effect.

Sincerely,



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Transportation Archaeologist  
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Cc: Pam Trautman, WSDOT ESO, MS 47332