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Subject: tonguerivereis preliminary comments

Cathy Nadals:

I received a post card announcing the release of the Tongue River RR EIS late last week. Please send a hard copy as well as a disk.

I was led clearly to expect a professional stand-alone report for the "phase one" sample level inventory. The draft eis cultural summary does not meet standards for such a report as described in Consulting with Montana SHPO. Site forms and recordation records for identified potential Historic Properties are not included. I know I agreed that the site form could be somewhat abbreviated for the phase one but expected items like visibility, sketch maps, referencing row, topography etc. Neither is any preliminary professional assess of potential eligibility included. I continue to expect a professional stand-alone to meet in documentation such as this. We require a hard copy and a digitized copy of all documentation for 106 purposes. The draft PA should also meet our standards and use of our consulting with Montana SHPO guidance and Forms. For example under testing (i.e. Propose site by site testing considerations for our comment prior to expecting us to except any unilateral STB or TRRR determination) and use of CRIS forms. I understand that our records office corrected many locational mistakes in early site forms but none of those forms appears in a report for my review or assessment at this time. We also need to see comments of tribes and other stake holders regarding the reconnaissance survey.

I will have some detailed comments ready soon and others on the draft PA. But as of today the bottom line is, I see some real and serious problems with the summary description in the EIS as relates to my being able to professionally review and assess the level of work and its relevance to informing alternative selection. This is particularly the case in light of the numerous concerns expressed by the landowners and the tribal participants. Where is the standard report? Stan.