

Appendix A:  
**CORRESPONDENCE**

James E. Howard

Attorney at Law

1 Thompson Square  
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Charlestown, MA 02129  
www.jehowardlaw.com

HEI-18052  
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jim@jehowardlaw.com

September 18, 2009

VIA FEDERAL EXPRESS

Victoria Rutson  
Chief  
Section of Environmental Analysis  
Surface Transportation Board  
395 E Street, S.W.  
Room 1106  
Washington, DC 20423-0001

Re: Abandonment in Penobscot and Aroostook Counties, Maine

Dear Ms. Rutson:

I represent Montréal, Maine & Atlantic Railway, Ltd. ("MMA"), a class II rail carrier that operates in Maine, Vermont, New Brunswick and Québec. MMA intends to file an abandonment application for certain lines, described more fully below, and requests, in connection with such application, approval for the retention of a third-party consultant and adoption of an alternative environmental review process, all as more fully set forth below.

On August 28, 2009, MMA filed a system diagram map listing 5 line segments in category 1. MMA intends to file an abandonment application for such line segments, which are described more fully as follows:

1. The Madawaska Subdivision, located in Penobscot and Aroostook Counties, between milepost 109 near Millinocket and milepost 260 near Madawaska;
2. The Presque Isle Subdivision, located in Aroostook County, between milepost 0.0 near Squa Pan and milepost 25.30 near Presque Isle;
3. The Fort Fairfield Subdivision, located in Aroostook County, between milepost 0.0 in Presque Isle and milepost 10.0 near Easton;
4. The Limestone Subdivision, located in Aroostook County, between milepost 0.0 near Presque Isle and milepost 29.85 near Limestone; and

5. The Houlton Subdivision, located in Aroostook County, between milepost 0.0 near Oakfield and milepost 16.9 near Houlton.

In accordance with 49 CFR 1105.10(d), MMA requests approval from SEA to retain a third-party consultant to assist it in the preparation of the necessary environmental documentation. Specifically, MMA proposes to retain HNTB Corp. for this purpose. Ron Deverman of HNTB will be the principal professional in charge of the effort to prepare the environmental documents. HNTB and Mr. Deverman, in particular, have extensive experience in dealing with your office and in the preparation of environmental materials in connection with rail transactions generally and abandonments in particular. MMA believes that HNTB is eminently qualified and should be approved as a third-party consultant. MMA understands that if the retention of HNTB is approved, HNTB would work under the direction of SEA but would be compensated by MMA.

As provided in 49 CFR 1105.10(d), the environmental reporting requirements that would otherwise apply will be waived if the applicant hires a third-party consultant and SEA approves the scope of the consultant's work. MMA hereby requests such a waiver of the reporting requirements that would otherwise apply, including specifically the requirements of 49 CFR 1105.7 and 1105.8 for the filing of an environmental report and a historic report. In lieu of such reports, MMA proposes to submit, with the direction and assistance of HNTB, a preliminary draft Environmental Assessment incorporating the substance of the information required by 49 CFR 1105.7 and 1105.8.

MMA also requests that you determine that an Environmental Assessment is the appropriate level of environmental documentation for the proposed abandonment. An Environmental Assessment is consistent with the Board's regulations at 49 CFR 1105.6(b)(2), which provides that Environmental Assessments, rather than Environmental Impact Statements, will generally be used for abandonment proceedings. MMA is aware of no extraordinary fact or circumstance that would indicate that an Environmental Impact Statement would be necessary or appropriate in this case.

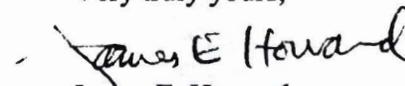
MMA suggests the following schedule and procedure be followed for purposes of the Environmental Assessment:

1. MMA, through HNTB, will submit a preliminary draft Environmental Assessment as promptly as practicable, and SEA will provide any preliminary reactions or suggestions within 10 days thereafter.
2. MMA, through HNTB, will submit, approximately 7 days prior to filing the abandonment application, a revised draft Environmental Assessment, taking into account any reactions or suggestions from SEA and others with whom consultation is appropriate.
3. SEA will, assisted by HNTB as a third-party consultant, review and verify the information in the draft Environmental Assessment, discuss any questions or issues with MMA and HNTB and issue and make available for public review and comment an

Environmental Assessment within 30 days after the filing of the abandonment application.

In summary, MMA respectfully requests that you approve HNTB as a third-party consultant, waive the requirement of environmental and historic reports, determine that an Environmental Assessment is appropriate, rather than an Environmental Impact Statement, and adopt the procedure and schedule outlined above. If you have questions, need additional information or wish to discuss any of MMA's requests, please contact the undersigned or feel free to contact Mr. Deverman directly (312-798-0221). We will be available at your convenience to discuss any of these matters. Thank you very much for your consideration of this request.

Very truly yours,

  
James E. Howard

cc: Ron Deverman

James E. Howard

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October 22, 2009

VIA FEDERAL EXPRESS

Victoria Rutson  
Chief--Section of Environmental Analysis  
Surface Transportation Board  
395 E Street, S.W.  
Washington, DC 20423-0001

Re: Abandonment in Penobscot and Aroostook Counties, Maine

Dear Ms. Rutson:

By letter dated September 18, 2009, I advised you that Montréal, Maine & Atlantic Railway, Ltd. ("MMA") intends to file an abandonment application for approximately 233 miles off lines located in Penobscot and Aroostook Counties in Maine. In anticipation of the abandonment application, MMA retained HNTB to provide assistance on environmental and historic matters.

HNTB has conducted a preliminary environmental review of the proposed abandonment. As a result of implementation of the abandonment, rail customers currently served by the lines would need to find other means of transportation. The most likely alternative means of transportation would be trucks, but HNTB does not expect the increase in trucks on local roads and highways to be significant. Furthermore, HNTB believes that any increase in air emissions due to rail to truck conversions would be within the parameters established by the National Air Quality Standards.

Upon approval of the abandonment, MMA plans to salvage the track material. All salvaging activity is expected to be done within the existing right-of-way, and no new access roads would be constructed for the removal of track materials. In fact, it is anticipated that the track material would be removed by rail, rather than truck. Noise disturbances during the salvaging operations would be insignificant and short-term. The rail lines in question cross a number of waterways, but MMA does not plan to remove any bridges. Consequently, HNTB does not expect any impacts to streams or associated wetlands under or adjacent to bridges. The lines are not located within a Maine coastal zone, and, except for 3 structures that are more than 50 years old and that will not be disturbed, there are no historic or cultural resources within the right-of-way. Therefore,

as a result of its preliminary environmental review, HNTB does not expect any significant impacts to the environment as a result of the abandonment.

In my letter of September 18, 2009, I requested that the Section of Environmental Analysis ("SEA") approve HNTB as a third-party consultant, waive the requirement of an environmental report and historic report, determine that an Environmental Assessment, rather than an Environmental Impact Statement, would be appropriate and adopt a schedule that we proposed. Subsequently, Ron Deverman of HNTB and I had telephone conversations with Diana Wood of your office, and Ms. Wood sent an e-mail dated September 29, 2009 outlining the views of SEA on the issues under discussion.

MMA and SEA have reached an understanding on these issues for purposes of the proposed abandonment. The purpose of this letter is to set forth the terms of and to confirm the understanding that has been reached.

We understand that you have approved HNTB as a third-party consultant in accordance with 49 CFR 1105.10(d). As required by the regulations, HNTB will be working under your direction but will be compensated by MMA. Mr. Deverman will be the principal contact at HNTB, which will sign a disclosure statement in accordance with SEA procedures. HNTB will keep a log of its communications with MMA personnel and will provide a copy of the log to SEA at your request.

You have agreed to waive the requirement of the environmental report and historic report that would normally be required pursuant to 49 CFR 1105.7 and 1105.8. In lieu of such reports, MMA will prepare, through and under the direction of SEA and HNTB and on the schedule outlined below, a preliminary draft Environmental Assessment. Based on the preliminary environmental review by HNTB, as described above, you have determined that an Environmental Assessment is the appropriate level of environmental documentation for the abandonment, rather than an Environmental Impact Statement.

The schedule that we have agreed upon is as follows:

1. At least 30 days prior to the filing of an abandonment application, MMA, through HNTB, will submit to SEA a preliminary draft Environmental Assessment. The format and content of the preliminary draft Environmental Assessment will be generally as set forth in the outline that is enclosed herewith. We understand that HNTB will consult regularly with you during the course of preparing the preliminary draft Environmental Assessment to discuss the form, content and level of detail of the document to ensure that it meets with your approval.

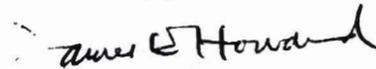
2. At least 20 days prior to the filing of an abandonment application, MMA, through HNTB, will file and serve on interested parties, in accordance with 49 CFR 1105.7(b), a draft Environmental Assessment, taking into account any review comments provided by SEA prior to such filing and service.

3. SEA will thereafter, in conjunction with HNTB, review and verify the information in the draft Environmental Assessment, discuss any questions or issues with MMA, HNTB and other interested parties and make any changes that are appropriate or necessary.

4. SEA will, drawing upon HNTB as necessary, produce a final Environmental Assessment and make it available for public comment on a schedule required or permitted by applicable regulations.

Thank you very much for the responsiveness and cooperation of your office in connection with this matter. We look forward to working together on this abandonment project. Please let me know promptly if the foregoing does not accurately state the understanding between the parties.

Very truly yours,



James E. Howard

Enclosure  
cc: Ron Deverman

**Draft Outline for Environmental Assessment**

**Montreal, Maine and Atlantic Railway Ltd.**

**Rail Abandonment in Penobscot and Aroostook Counties, Maine**

- 1.0 Introduction and Background**
  - 1.1 Proposed Action**
  - 1.2 Description of Line**
  - 1.3 History of Rail Operations**
  - 1.4 NEPA and Implementing Regulations**
  
- 2.0 Alternatives to Abandonment**
  - 2.1 No-Action – Continued Operations**
  - 2.2 Continued Service by New Operator**
  
- 3.0 Existing Conditions and Environmental Impacts of Abandonment**
  - 3.1 Land Use**
  - 3.2 Transportation**
    - Rail to truck conversions**
    - Other potential impacts**
  - 3.3 Energy**
  - 3.4 Air Quality and Noise**
  - 3.5 Safety**
  - 3.6 Biological Resources (as applicable)**
  - 3.7 Water**
  - 3.8 Historic and Cultural Resources**
  - 3.9 Social and Economic**

- 4.0 Conclusion
- 5.0 SEA Recommended Mitigation and Conditions (if applicable)
- 6.0 Public Use
- 7.0 Trails Use (if applicable)
- 8.0 Public Assistance
- 9.0 Coordination and Comments

(resource/regulatory agencies, interested parties,  
Native American tribes)  
(contact information for comments on Draft EA)

**SURFACE TRANSPORTATION BOARD**  
**Washington, DC 20423**

Office of Economics, Environmental Analysis, and Administration

HEO-1406  
DAW  
AB 1043 IX

November 2, 2009

James E. Howard, Esq.  
1 Thompson Square, Suite 201  
Charlestown, MA 02129

**RE: Montreal, Maine & Atlantic Railway, LTd – Future Rail Line  
Abandonment in Penobscot and Aroostook Counties, Maine; Approval of  
Request to Submit a Preliminary Draft Environmental Assessment and  
Hire a Third-Party Contractor**

Dear Mr. Howard:

I am responding to your letters of September 18, 2009 and October 22, 2009, in which you request approval of an alternative environmental review process for a proposed abandonment of the Montreal, Maine & Atlantic Railway, Ltd (MMA). Specifically, you request that the Section of Environmental Analysis (SEA) waive the requirement to submit environmental and historic reports under 49 CFR 1105.7 and 1105.8 when the abandonment application is filed. In lieu of the reports, you request that SEA permit MMA to hire HNTB as a third-party consultant to work solely under the direction of SEA to prepare a Preliminary Draft Environmental Assessment (PDEA).<sup>1</sup> Your letter also includes a revised schedule by which MMA will submit the PDEA to SEA for its independent review and verification. Thereafter, SEA will make the Environmental Assessment (EA) available for public review and comment.

Based on our discussions and the supporting documentation submitted with your proposal, SEA approves of your request to waive the requirement to submit environmental and historic reports and in lieu, submit a PDEA. SEA also approves of your request to hire HNTB as a third-party consultant, pursuant to 49 CFR 1105(10)(d), to prepare the PDEA, providing that HNTB completes the attached disclosure statement and promptly returns it to SEA. We have reviewed the revised schedule as outlined in your most recent letter and agree that the following sequence of events will occur:

- MMA, through HNTB, will submit the PDEA to SEA at least 30 days prior to filing the abandonment application.

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<sup>1</sup> The Council on Environmental Quality regulations at 40 CFR 1506.5(b) allow for the preparation of Environmental Assessments. The PDEA must include the information required by the Board's regulations at 49 CFR 1105.7 and 1105.8.

- MMA, through HNTB, will file and serve copies of the PDEA on interested parties at least 20 days prior to filing the abandonment application, taking into account any review comments provided by SEA.
- SEA, in conjunction with HNTB, will review and verify the information in the PDEA, and make changes to the document as necessary.
- SEA will make the EA available to the public for review and comment.
- SEA will issue a Post EA three days after the comment period, taking into consideration any additional comments it receives during this time.

In consideration of your request to prepare an EA rather than an Environmental Impact Statement (EIS), we have determined, based on the information available to date, that an EA appears to be the appropriate level of environmental documentation for this proposal. This approach is consistent with the Board's rules, which contemplate that an EA and not a full EIS typically is adequate in rail line abandonment proceedings. Nevertheless, if it becomes clear that potentially significant adverse environmental effects would result from the project and could not be adequately mitigated, SEA could determine that an EIS is warranted.

Thank you for initiating early consultation for the proposed undertaking. If you have any questions or would like to discuss this matter further, please contact Diana Wood of my staff at (202) 245-0302 or email at [woodd@stb.dot.gov](mailto:woodd@stb.dot.gov).

Sincerely,



Victoria Rutson  
Chief  
Section of Environmental Analysis

Enclosure

# SURFACE TRANSPORTATION BOARD

## DISCLOSURE STATEMENT

On behalf of HNTB Corporation, I certify that HNTB Corporation has no financial or other interests in the outcome of the prospective petition in Montreal, Maine & Atlantic Railway, Ltd. – Abandonment and Discontinuance of Service – In Penobscot and Aroostook Counties, Maine.

Signature: Steven P. McElligott

Printed Name: Steven P. McElligott, P.E.,

Title: Vice President

Date: November 2, 2009



**SURFACE TRANSPORTATION BOARD**  
Washington, DC 20423

*Section of Environmental Analysis*

February 4, 2010

Re: Montreal, Maine & Atlantic Railway Ltd., Proposed Rail Abandonment in  
Penobscot and Aroostook Counties, Maine, Preliminary Draft Environmental Assessment

Dear Reviewer:

This is to inform you that on or about February 24, 2010, the Montreal, Maine & Atlantic Railway Ltd. (MMA) intends to file an application with the Surface Transportation Board (STB or the Board) pursuant to 49 CFR 1152.50 seeking authority to abandon and discontinue service on approximately 233 miles of main line and branch line tracks in Penobscot and Aroostook Counties, Maine. The Board's Section of Environmental Analysis (SEA) will review and investigate the record in this proceeding pursuant to the National Environmental Policy Act, 42 U.S.C. § 4321, *et seq.* and implementing regulations in 49 Code of Federal Regulations (CFR) § 1105 *et seq.* and other applicable laws.

The enclosed Preliminary Draft Environmental Assessment (PDEA) has been prepared to evaluate the potential environmental impacts associated with the proposed abandonment and discontinuance of operations on the MMA. This PDEA is being served on a number of appropriate Federal, state, regional and local agencies, Native American tribes, and other interested parties as required by the Board's environmental rules at 49 CFR 1105.7(b). A Draft EA will also be made available for review and comment after incorporating additional information or review comments that are received on this PDEA.

SEA appreciates the efforts of all parties to review and comment on the MMA rail abandonment environmental document. If you have questions, pertinent information or wish to comment on the PDEA, please provide your response as soon as possible to Diana Wood of my staff at (202) 245-0302; fax (202) 245-0454; and E-mail at [diana.wood@stb.dot.gov](mailto:diana.wood@stb.dot.gov). Thank you for your participation.

Sincerely

Victoria Rutson  
Chief  
Section of Environmental Analysis

Enclosure

## State Agencies

Maine State Planning Office  
38 State House Station  
Augusta, ME 04333  
207.287.6077

<http://www.maine.gov/spo/>

Martha Freeman, Director of the Office  
207.287.6077, [martha.freeman@maine.gov](mailto:martha.freeman@maine.gov)

Maine Historic Preservation Commission  
55 Capitol Street  
Station 65  
Augusta, ME 04333  
207.287.2132

<http://www.state.me.us/mhpc/>

Earle G. Shettleworth, Jr., Director and State Historic Preservation Officer  
207.287.2132

State of Maine Department of Conservation  
93 State House Station  
Augusta, ME 04333  
207.287.8044

Sarah Demers

Environmental Review Coordinator, Maine Natural Areas Program  
207.287.8670, [sarah.demers@maine.gov](mailto:sarah.demers@maine.gov)

Maine Department of Conservation  
Land Use Regulatory Commission  
Catherine M. Carroll, Director  
18 Elkins Lane, Harlow Building  
22 State House Station  
Augusta, Maine 04333-0022

Ph: 207-287-2631

Fax: 207-287-7439 [Catherine.M.Carroll@maine.gov](mailto:Catherine.M.Carroll@maine.gov)

Maine Department of Environmental Protection  
State House Section 17  
Augusta, ME 04333  
207.287.7688

<http://www.maine.gov/dep/index.shtml>

Commissioner David P. Littell

207.287.2812, [david.p.littell@maine.gov](mailto:david.p.littell@maine.gov)

Maine Coastal Zone Management Program  
187-189 State Street  
38 State House Station  
Augusta, ME 04333  
207.287.1486

<http://www.maine.gov/spo/coastal/index.htm>

Lorraine Lessard

207.287.1486, [lorraine.lessard@maine.gov](mailto:lorraine.lessard@maine.gov)

Maine Department of Transportation  
Nathan Moulton  
Manager of Rail Transportation  
16 State House Station  
Augusta, Maine 04333  
Ph: 207-624-3563  
Fax: 207 624-3251

#### Federal Agencies

U.S. Army Corps of Engineers New England District  
675 Western Ave., #3  
Manchester, MA 04351  
Ph: 207 623-8124  
Contact: Shawn Mahaney  
<http://www.nae.usace.army.mil/>

U.S. National Geodetic Survey  
NGS Information Services, NOAA, N/NGS12  
National Geodetic Survey SSMC-3, #9202  
1315 East-West Highway  
Silver Spring, MD 20910-3282  
301 713-3242, ext 103  
Contact: Simon Monroe  
<http://www.ngs.noaa.gov/>

U.S. Department of Agriculture  
Natural Resources Conservation Service  
967 Illinois Avenue, Suite 3  
Bangor, ME 04401  
<http://www.me.nrcs.usda.gov/>  
Juan Hernandez, State Conservationist  
207 990-9599, x. 3585, [juan.hernandez@me.usda.gov](mailto:juan.hernandez@me.usda.gov)

U.S. Fish and Wildlife Service Northeast Region  
Maine Field Office – Ecological Services  
17 Godfrey Drive, Suite 2  
Orono, ME 04473  
207 866-3344  
<http://www.fws.gov/northeast/me.htm>  
Contact: Lori Nordstrom

U.S. Environmental Protection Agency Region 1  
1 Congress Street, Suite 1100  
Boston, MA 02114  
617.918.1111  
<http://www.epa.gov/region1/>  
Ira Leighton, Acting Regional Administrator, EPA New England

U.S. National Park Service Northeast Region  
U.S. Custom House  
200 Chestnut Street, 5th Floor

Philadelphia, PA 19106

215.597.7013

<http://www.nps.gov/nero/>

Dennis R. Reidenbach, Northeast Regional Director

215.597.7013, [Dennis\\_Reidenbach@nps.gov](mailto:Dennis_Reidenbach@nps.gov)

United States Department of Commerce

National Oceanic and Atmospheric Administration

National Marine Fisheries Service, Habitat Conservation

55 Great Republic Drive

Gloucester, MA 01930

### List of Federally-Recognized Tribal Nations in Maine

Aroostook Band of Micmacs Indians

<http://www.micmac-nsn.gov/>

7 Northern Road

Presque Isle, ME 04769

207.764.1972

Victoria Higgins, Tribal Chief

[vhiggins@micmac-nsn.gov](mailto:vhiggins@micmac-nsn.gov)

Houlton Band of Maliseet Indians

<http://www.maliseets.com/index.htm>

88 Bell Road

Littleton, ME

207.532.4273

Brenda Commander, Tribal Chief

Passamaquoddy Tribe (Indian Township)

P.O. Box 301

Tribal Government

Princeton, ME 04668

<http://www.passamaquoddy.com/>

Ph: 207.796.2301

Chief William Nicholas

Passamaquoddy Tribe (Pleasant Point)

(same address as above)

Penobscot Tribe

<http://www.penobscotnation.org/>

Penobscot Indian Nation

Tribal Administration

12 Wabanaki Way

Indian Island, ME 04468

207.827.7776

Chief Kirk Francis

## County Agencies

Aroostook County  
County Commissioner's Office  
144 Sweden Street, Suite 1  
Caribou, ME 04736  
207.493.3318  
County Administrator Douglas F. Beaulieu  
[doug@aroostook.me.us](mailto:doug@aroostook.me.us)

Penobscot County  
97 Hammond Street  
97 Hammond Street  
Bangor, Maine 04401  
207.942.8535  
County Administrator Bill Collins

Northern Maine Development Commission  
11 West Presque Isle Rd  
Caribou ME, 04736-0779  
Denis Berube  
Director, Planning & Transportation Services  
Phone: (207) 493-5764 ext 237  
Receptionist: (207) 498-8736  
Toll Free in Maine: 1(800) 427-8736  
Mobile: (207) 551-5801  
Fax: (207) 493-5800  
email: [dberube@nmdc.org](mailto:dberube@nmdc.org)  
website: [www.nmdc.org](http://www.nmdc.org)

Eastern Maine Development Commission  
40 Harlow Street  
Bangor, ME 04401  
[www.emdc.org](http://www.emdc.org)  
Ph: 207 942-6389

STATE OF MAINE  
COUNTY OF PENOBSCOT  
COURT OF COUNTY COMMISSIONERS

# E1-18054  
DAW  
AB 1043 IX



PETER K. BALDACCI  
THOMAS J. DAVIS  
STEPHEN S. STANLEY

BANGOR, MAINE  
(207) 942-8535

William Collins, County Administrator

COURTHOUSE  
97 Hammond Street - Bangor, Maine 04401-4998

February 16, 2010

Surface Transportation Board  
Attn: Diana Wood  
Washington, DC 20423

Re: Montreal, Maine & Atlantic Railway Ltd., Proposed Rail Abandonment

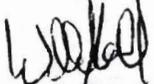
Dear Ms. Wood,

The Penobscot County Commissioners have reviewed the Preliminary Draft Environmental Assessment regarding the proposed abandonment and discontinuance of operations of approximately 233 miles of main and branch line tracks of the Montreal, Maine & Atlantic Railway, which runs through Penobscot and Aroostook Counties in the State of Maine. The Commissioners are troubled by this proposal due to the reasons listed below:

- Discontinuing this service would result in additional truck traffic on State and Local roads. Additional truck traffic on these roads is not only a financial concern but is also a safety and environmental concern.
- Discontinuance of this service presents a greater financial burden to the existing Montreal, Maine & Atlantic customer base in an already difficult economic time.
- The proposed abandonment and discontinuance of service would result in an overall increase in energy consumption. As stated in the Preliminary Draft Environmental Assessment, trucks would consume an additional 935,976 gallons of diesel fuel in the transport of freight currently being transported by the railroad.

Penobscot County Commissioners Chairman, Stephen Stanley also noted that the State of Maine has a financial interest in these lines through funding from the Industrial Rail Access Program. Mainly these projects have consisted of the addition of sidings for the loading of rail cars. Therefore, the Commissioners wish to formally file their opposition to the proposed abandonment and discontinuance of service of this railway.

Respectfully,

  
William J. Collins, County Administrator



MHPC# 0199-10 proposed rail abandonment in Penobscot and Aroostook  
Counties, Maine

Stancampiano, Robin to: diana.wood  
Cc: "Mohney, Kirk"

03/08/2010 03:57 PM

#E1-18060  
RW  
AB-1043 1

From: "Stancampiano, Robin" <Robin.Stancampiano@maine.gov>  
To: <diana.wood@stb.dot.gov>  
Cc: "Mohney, Kirk" <Kirk.Mohney@maine.gov>

History: This message has been replied to.

**MHPC# 0199-10**

**Re: Montreal, Maine & Atlantic Railway Ltd.; proposed rail abandonment (approx. 223 miles of main line and branch line tracks) in Penobscot and Aroostook Counties, Maine; preliminary draft environmental assessment (PDEA)**

Dear Ms. Wood:

In response to your recent request, our office has reviewed the information received February 5, 2010 to initiate consultation on the above referenced undertaking pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended.

Regarding this undertaking, our office does not appear to have any concerns regarding prehistoric or historic archaeological resources.

Regarding above ground resources, the abandonment of any potentially eligible structures on this line, even if left in place, may constitute an adverse effect on historic properties pursuant to Section 106 regulations. We request that architectural survey be conducted in order to identify eligible resources as a first step in assessing effects on historic properties and to assist in the possible development of mitigation.

Architectural survey must be completed according to our "Above Ground Cultural Resource Survey Manual Guidelines for Identification: Architecture and Cultural Landscapes Section 106 Specific" and associated forms, which are both downloadable from our website:

[http://www.maine.gov/mhpc/architectural\\_survey](http://www.maine.gov/mhpc/architectural_survey) (click on tabs in white box on left side of page) Please note that our revised photographic policy must be referenced in lieu of the policy in our on-line survey manual:

[http://www.maine.gov/mhpc/architectural\\_survey/survey\\_guidelines.html](http://www.maine.gov/mhpc/architectural_survey/survey_guidelines.html) Any computer generated template other than that provided by MHPC must be approved by MHPC prior to submission. No changes to the survey forms are to be made without consulting MHPC. Please note that this area may include properties that have been surveyed as part of prior project reviews. In order to determine whether portions of the project area have been previously surveyed, please contact Christi Mitchell of our office at 207-287-1453. You may find a list of historic preservation consultants on our website:

[http://www.maine.gov/mhpc/project\\_review/consultants/architectural\\_consultants.shtml](http://www.maine.gov/mhpc/project_review/consultants/architectural_consultants.shtml)

We look forward to continuing consultation with you on this project.

Robin Stancampiano  
--Review & Compliance Coordinator  
--Certified Local Government Coordinator  
Maine Historic Preservation Commission  
55 Capitol Street  
65 State House Station  
Augusta, ME 04333  
phone: 207-287-2132 ext. 1  
fax: 207-287-2335  
<http://www.maine.gov/mhpc>