

E1 20224



State Historic Preservation Office

September 5, 2008

Ms. Victoria Rutson
Section of Environmental Analysis
Surface Transportation Board
Washington, D.C. 20423

Re: STB No. AB-33 (Sub. No. 234X)
Proposed abandonment of the Stillwater Industrial Lead from M.P. 469 to M.P. 5.5
Union Pacific Railroad
Washington County
SHPO Number: 2006-0286

Dear Ms. Rutson:

We wrote Mr. Mack Shumate of the Union Pacific on 6 June 2008 regarding the above referenced proposed action, requesting further consideration of direct or indirect effects of the proposed abandonment on the adjacent South Main Archaeological District.

We appreciate the response to our letter from Raymond Allamong of the Union Pacific. However, the information in Mr. Allamong's letter does not adequately address potential effects of the abandonment on the archaeological district. It does not appear Mr. Allamong is familiar with the nature of the archaeological site, or that any cultural resource professionals participated in the assessment.

The archaeological district is a linear area composed of above and below ground remains of an extensive milling complex. The tracks run immediately above many of the historic components of the site. In some areas, erosion has resulted in loss of the soil directly below the tracks and exposure of the historic district components to further damage. It is not clear if the tracks themselves are serving as a stabilization force for the land directly under them. Any destabilization of this land could create a significant threat to major elements of the archaeological site. Even driving equipment over the tracks in their deteriorated condition could cause problems.

As we stated in our letter, indirect/cumulative effects also need to be considered. We understand that the corridor is slated for a section of a loop trail that will be built as part of the St. Croix River Crossing Project. Elements of that project will be reviewed under the provisions of a Section 106 agreement completed by the Federal Highway Administration and the Minnesota Department of Transportation. The Minnesota Department of Transportation will be constructing the trail, and it would be helpful to include them in the consideration of the effects of the abandonment. They should be in a good position to assess the desired condition of the track area after abandonment activities so that the trail development can proceed with minimal effects on the historic district.

Perhaps the best way to address this issue would be to schedule an onsite meeting with MnDOT staff, the Historical Architect from our office, our Compliance Staff, and the City of Stillwater (who is expected to be the owner of the park and trail). Please contact me at 651-259-3456 to set up such a meeting or discuss any aspects of this review.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis A. Gimmestad". The signature is fluid and cursive, with a prominent initial "D" and a long, sweeping tail.

Dennis A. Gimmestad
Government Programs & Compliance Officer

cc: Jackie Sluss, MnDOT
Todd Clarkowski, MnDOT
Bill Turnblad, City of Stillwater
Mack Shumate, Union Pacific
Raymond Allamong, Union Pacific