



## Oklahoma Archeological Survey

THE UNIVERSITY OF OKLAHOMA

September 28, 2022

Danielle Gosselin, Director  
Office of Environmental Analysis  
Surface Transportation Board  
395 E St SW  
Washington, DC. 20423

Re: OAS FY22-2478: Phase I Archaeological Survey for the Proposed Acquisition of the Kansas City Southern Railway by the Canadian Pacific Railway, in Adair and Le Flore Counties, Oklahoma  
Legal Description: Section 18, T17N, R26E; Sections 13 and 24, T17N, R25E; Sections 25, 26, and 35, T15N, R24E; Sections 26 and 27, T9N, R25E; Section 36, T5N, R25E; and Sections 30-31, T5N, R26E  
Adair and Le Flore Counties, Oklahoma

Dear Ms. Gosselin:

This agency received the above-listed report for review and comment. From your cover letter, I understand that VHB staff surveyed a 56.01-acre portion of the Area of Potential Effects (APE) within Oklahoma between January 10 and April 21, 2022. Thirteen new precontact archaeological sites were recorded within the surveyed area, consisting of site number 34AD282-294. Among these sites, STB recommends that only 34AD283 and 34AD286 are eligible for listing on the National Register of Historic Places (NRHP); they recommend the others are not NRHP-eligible. All of these sites appear to possibly extend outside the APE; the recommendations issued are only in relation to the information gleaned as a result of the current survey. It is possible that additional investigation of the portions of these sites outside the APE may yet retain integrity and research potential. STB further recommends: "(t)he Proposed Acquisition and associated planned capital improvements would have no adverse effect on the eligible archaeological sites (34AD283 and 34AD286) because the planned new siding at MP 247 [Baron] would be located entirely within the existing limits of the current railroad berm and ballast in the areas adjacent to the eligible archaeological sites."

**I concur with the findings and recommendations as they pertain to the precontact archaeological sites that are recommended not NRHP-eligible (34AD282, 34AD284-285; and 34AD287-294). I do not believe there is sufficient information available at present to concur that 34AD283 and 34AD286 are NRHP-eligible. However, I do agree that the undertaking should do no further harm to these sites provided the activities are conducted as proposed. Should the project plans change or the proposed ground-disturbing activities extend beyond the areas investigated as part of the above-listed survey, additional consultation would be warranted. I defer further comment on overall project effects to the State Historic Preservation Office.**

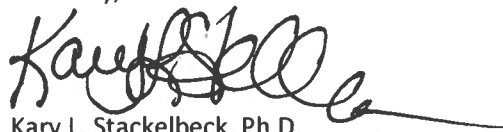
Beyond these comments on NRHP-eligibility and project effects, I request Isolated Find forms for each of the precontact and historic-period isolates documented in the report. We retain these data in our files and it is easier to do so using our standard IF forms, which are available on our website:



<https://www.ou.edu/archsurvey/cultural-resource-management/forms>. I appreciate your consideration of this request.

This environmental review and evaluation is done in cooperation with the State Historic Preservation Office, Oklahoma Historical Society. The responsible federal agency or their official delegate must also have a letter from that office to document consultation pursuant to Section 106 of the National Historic Preservation Act.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kary L. Stackelbeck', with a long horizontal flourish extending to the right.

Kary L. Stackelbeck, Ph.D.  
State Archaeologist

cc: SHPO