



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

June 18, 2024

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

In future correspondence please refer to:

Project Tracking Code: 2016-07-04716

Property: Abandonment of the Columbia & Cowlitz Railway, Patriot Woods RR

Re: Draft MOA Comments

Dear Danielle Gosselin:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. This action has been reviewed on behalf of the State Historic Preservation Officer (SHPO) under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation contained in your submittal: Memorandum of Agreement among the Surface Transportation Board, Columbia & Cowlitz Railway, LLC., And Washington State Department of Archaeology and Historic Preservation Regarding Docket No. Ab 1244x Columbia & Cowlitz Railway LLC Abandonment Exemption in Cowlitz County, Washington (MOA).

At this time, DAHP needs to have due dates added for each stipulation of the amended MOA. Given the lack of accountability for the previous MOA, we are requesting the addition of timeframes to ensure completion of the stipulations within the amended MOA's three-year duration. At this time, there is no process outlined regarding how the Surface Transportation Board will track the progress of the previously agree upon stipulations and ensure all are completed within the timeframe of the MOA. Please see the attached letter from DAHP (dated February 25, 2022) detailing the inadequacies in the stipulated HPIs and Historic Context.

Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me.

Sincerely,

Maureen Elenga, M.A.  
Transportation Reviewer  
(360) 972-4539  
Maureen.Elenga@dahp.wa.gov





Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

February 25, 2022

Adam Assenza  
Environmental Protection Specialist  
Office of Environmental Analysis  
Surface Transportation Board

In future correspondence please refer to:  
Project Tracking Code: 2021-08-05893  
Property: Columbia and Cowlitz Railroad MP 8.5 (Ostrander Jct) to MP30 (End of Line)  
Re: Historic Context and Inventory Review Comments

Dear Adam Assenza:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP). The above referenced project has been reviewed on behalf of the State Historic Preservation Officer (SHPO) under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800, and the *Memorandum of Agreement among the Surface Transportation Board, Patriot Woods Railroad, LLC. And Washington State Department of Archaeology and Historic Preservation Regarding Docket No. Ab 1243x Patriot Woods Railroad LLC Abandonment Exemption in Cowlitz County, Washington (MOA)*.

Our review is based upon documentation provided in DAHP's online Wisaard database. At this time, the documentation provided does not meet the requirements specified under Stipulation I.A. of the MOA. In order to meet the requirements of Stipulation I.A., the following must be provided to our office for review and comment before finalization (emphasis ours):

- A historic context document regarding the history, development, and construction of the CCR line from Ostrander Junction to milepost 30. To be included in the documentation are copies of any **historic images, plans, and drawings** of the CCR. The narrative history shall be accompanied by a **photographic record which documents extant historic structures and small elements** of the line which may or may not receive individual Historic Property Inventory Forms. These shall include but not limited to: railroad grade prisms, trestles, bridges, tunnels, signs, switches, wyes, culverts, buildings, rolling stock, significant horizontal and vertical grade alignments.
  - We would like to offer that the National Park Service offers guidance in several locations regarding how to research, prepare, and write historic contexts that would be relevant for this task:
    - How to Complete the National Register Multiple Property Documentation Form (NRB 16B): <https://www.nps.gov/subjects/nationalregister/upload/NRB16B-Complete.pdf>.
    - NR White Paper: The Components of a Historic Context: [https://www.nps.gov/subjects/nationalregister/upload/White\\_paper\\_on\\_historic\\_context\\_508\\_200904.docx](https://www.nps.gov/subjects/nationalregister/upload/White_paper_on_historic_context_508_200904.docx).
    - Researching a Historic Property (NRB 39): <https://www.nps.gov/subjects/nationalregister/upload/NRB39-Complete.pdf>.
  - In order to be considered for further review, the historic context must be revised to include the following:
    - Historic images, plans, and drawings of the CCR;



- A photographic record which documents extant historic structures and small elements, including but not limited to: railroad grade prisms, trestles, bridges, tunnels, signs, switches, wyes, culverts, buildings, rolling stock, significant horizontal and vertical grade alignments;
  - Current maps photographs to illustrate the narrative provided;
  - A consistent, accurate built date for the CCR;
  - Research to determine if a professional is associated with the construction of the structure.
- No less than **nine (9) Historic Property Inventory (HPI) forms**; one for the overall alignment, and additional HPI forms to record extant historic structures, objects, and features of the CCR line that are 45 years in age or older and that would be considered as character-defining features (such as bridges, tunnels, and trestles) contributing to the National Register eligibility of the CCR. These resources shall be recorded at the **intensive level**.
  - At this time, it appears only seven (7) HPIs have been completed, and do not meet the requirements of an intensive level survey. In order to meet those requirements, intensive level HPIs must include, but not be limited to, the following:
    - Research to determine if a professional is associated with the construction of the property;
    - All applicable data fields, check-boxes, and pull-down menus completed.
    - A sufficient number of photographs to capture all views and elevations of the subject property;
    - Relevant historic images, maps, drawings, and other ephemera custom to the subject property
    - A thorough, well-researched Statement of Significance custom to the subject property, which includes a historic context customized to the subject property, a discussion of the four (4) NRHP criteria, and a discussion of the seven aspects of integrity, as they all relate to the subject property;
    - A thorough and detailed Physical Description, capturing the current physical appearance of the subject resource and alterations over time.
- Stipulation I.A. also specifically states: “These tasks shall be performed by a qualified historic preservation professional meeting the Secretary of the Interior’s Professional Qualifications as defined in 36 CFR Part 61 in **architectural history or history**. Expertise in industrial/engineering history is highly desirable.”
  - To be clear, based upon the specifications of the Stipulation, **all tasks**, including the fieldwork, must be completed by a qualified historic preservation professional meeting the Secretary of the Interior’s Professional Qualifications as defined in 36 CFR Part 61 in architectural history or history.
  - At this time, DAHP is unclear regarding the SOI qualifications of the current cultural resource team. Based upon our records, both team members have signed Wisaard user agreements as **Professional Archaeologists**, who would not qualify to complete this work.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer (SHPO) in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800 and the MOA. Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me.

Sincerely,





Holly Borth  
Preservation Design Reviewer  
(360) 890-0174  
Holly.Borth@dahp.wa.gov

Cc: Peter Barber, Cowlitz Indian Tribe

