



February 24, 2025

Spencer M. Naake
Council for Saratoga Railroad, LLC
Mullins Law Group PLLC
2001 L Street NW, Suite 720
Washington, D.C. 20036
Re: Saratoga Railroad, LLC – Abandonment Exemption in Carbon County, WY AB-1343
(DBPR_WY_2025_75)
Dear Mr. Naake,

Thank you for consulting with the Wyoming State Historic Preservation Office (SHPO) regarding the above referenced undertaking. Following 36 CFR Part 800, we find that the proposed undertaking is in an area previously surveyed and 48CR6914 (the Saratoga Railroad) was determined to not be eligible for listing in the National Register of Historic Places. We agree that no further identification efforts are warranted.

There is a possibility that buried prehistoric or historic materials may be discovered during the undertaking and we recommend the Surface Transportation Board incorporate the following stipulation in the project permit:

If any cultural materials are discovered during construction, work in the area should halt immediately, the federal agency and SHPO staff be contacted, and the materials be evaluated by an archaeologist or historian meeting the Secretary of the Interior's Professional Qualification Standards (48 FR 22716, Sept. 1983).

This letter should be retained in your files as documentation of a SHPO concurrence with your finding of no historic properties affected. Please refer to DBPR_WY_2025_75 on any future correspondence regarding this undertaking. If you have any questions, please contact me at 307-777-5497.

Sincerely,

A handwritten signature in blue ink, appearing to read "Richard L. Currit".

Richard L. Currit
Senior Archaeologist

Mark Gordon | Governor
Dave Glenn | Director
Sara Sheen | SHPO Officer



**ARTS. PARKS.
HISTORY.**
Wyoming State Parks & Cultural Resources

From: [Spencer Naake](#)
To: [Assenza, Adam](#); [William Mullins](#)
Cc: [Gosselin, Danielle](#); [Tabachnick, Alan](#); [Webster, Elizabeth](#)
Subject: Re: AB-1343X: Question about SHPO contact
Date: Tuesday, February 25, 2025 12:44:44 PM
Attachments: [image001.png](#)
[image546095.png](#)
[Letter from WY SHPO 2.24.25.pdf](#)

Adam,

Please find the letter from the WY SHPO that we received yesterday.

Best,

Spencer



Spencer Naake

Associate

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From: Assenza, Adam <Adam.Assenza@stb.gov>
Sent: Wednesday, February 5, 2025 3:07 PM
To: Spencer Naake <snaake@mullinslawgroup.net>; William Mullins <wmullins@mullinslawgroup.net>
Cc: Gosselin, Danielle <Danielle.Gosselin@stb.gov>; Tabachnick, Alan <alan.tabachnick@stb.gov>; Webster, Elizabeth <Elizabeth.Webster@stb.gov>
Subject: RE: AB-1343X: Question about SHPO contact

Spencer,

Thank you for your timely response. Please cc me with your letter and any responses for the record.

Regards,

Adam Assenza

Environmental Protection Specialist

Office of Environmental Analysis

From: Spencer Naake <snaake@mullinslawgroup.net>

Sent: Wednesday, February 5, 2025 5:53 PM

To: Assenza, Adam <Adam.Assenza@stb.gov>; William Mullins <wmullins@mullinslawgroup.net>

Subject: Re: AB-1343X: Question about SHPO contact

Adam,

No, we have not had contact with the Wyoming SHPO regarding this proceeding. We can contact the appropriate office and send both the original E&HR and the Notice of Exemption immediately via email to expedite the process. We apologize for this mistake/ misunderstanding, let us know if something further is needed.

Best,

Spencer



Spencer Naake

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From: Assenza, Adam <Adam.Assenza@stb.gov>

Sent: Wednesday, February 5, 2025 9:54 AM

To: William Mullins <wmullins@mullinslawgroup.net>

Cc: Spencer Naake <snaake@mullinslawgroup.net>

Subject: AB-1343X: Question about SHPO contact

Hello,

I'm completing the environmental review in AB-1343X, for Saratoga Railroad LLC, and see that you certified submission to the Wyoming Historical Society. The Wyoming Historical Society is *not* the Wyoming State Historic Preservation Office

(<https://wyoshpo.wyo.gov/index.php/about-shpo/staff>). Subsequent to your filing with the Board, did you have any contact or reach out to Wyoming SHPO regarding this proceeding? If so, can you please forward me any letters or responses between you?

Thanks,

Adam Assenza

Environmental Protection Specialist

Office of Environmental Analysis

Surface Transportation Board

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Washington, DC 20423

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