



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
MICHIGAN STRATEGIC FUND
STATE HISTORIC PRESERVATION OFFICE

QUENTIN L. MESSER, JR.
PRESIDENT

August 11, 2023

ADAM ASSENZA
SURFACE TRANSPORTATION BOARD
OFFICE OF ENVIRONMENTAL ANALYSIS
395 E STREET SW
WASHINGTON DC 20423

RE: ER22-802 CSX CGC Line Abandonment Project, T10N, R17W, Sec. 25, 33, 34, 35, 36, Muskegon,
Muskegon County (STB)

Dear Adam Assenza:

We have received your request for review of the above-cited undertaking at the location noted above. The information that you have sent has prompted us to ask for additional details. Please send the following information so that we may complete our review:

- The undertaking is described as the abandonment and removal of 3.81 miles of existing rail line and sale of 2 miles to the City of Muskegon for trail use. The total project area covers 14.2 acres, including the associated right-of-way, which varies from 14 feet to 152 feet wide along the length of the track. While the proposed undertaking states that there will be no disturbance to below-grade soils with the removal of the rails, crossties, and upper layer of ballast, there is no discussion of what is planned for the 2-mile segment that is slated for reuse by the City of Muskegon.
- Because this segment of railroad has a history of operation beginning as early as 1869, SHPO is requesting additional information to establish the archaeological potential of the railroad and associated right-of-way. Specifically, we would like to see a more detailed history of land use through archival and historic documentation. While the railroad corridor certainly includes fill and urban-land sediments, these may be associated with the historic use of the railroad. A more detailed land use study can shed light on whether there could be cultural resources within the corridor that are significant to Muskegon history.
- The materials submitted indicate this abandonment project may be related to a rail-to-trail project. If so, these projects may be linked, and the rail-to-trail construction is part of the undertaking. Please clarify and expand the Area of Potential Effect (APE) to consider the both the direct and indirect effects to above-ground resources for this aspect of the undertaking.
- Please make a determination of eligibility for any properties or potential historic districts within your APE. 36 CFR § 800.4(c) requires the federal agency, or their designated representative, to apply the National Register criteria (36 CFR § 63) to properties that have not previously been evaluated for National Register eligibility and determine whether any of the National Register criteria are met. Currently, the State Historic Preservation Office has no information for several of the properties mentioned in the materials provided for our review or the surrounding properties that may be connected to the history of the CSX CGC railway. Your determination(s) of eligibility should be adequately documented in order that the State Historic Preservation Officer can concur with your determination(s) of eligibility.

Additional information can be submitted through online through our [Additional Information Portal](#).



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Please note that the Section 106 review process cannot proceed until we are able to consider the information requested above. This letter does not clear the project. If you have any questions, please contact Katlyn Yancho, Historian, at 517-256-3416 or by email at yanchok@michigan.gov. **Please reference our project number in all communication with this office regarding this undertaking.** Thank you for this opportunity to review and comment, and for your cooperation.

Sincerely,



Katlyn M. B. Yancho
Historian
for Martha MacFarlane-Faes
Deputy State Historic Preservation Officer

SSE:KMBY

Copy: Crista M. Haag, Arcadis US, Inc
Coley J. Campbell, CSX Transportation, Inc.