



SURFACE TRANSPORTATION BOARD
Washington, DC 20423
Section of Environmental Analysis

July 14, 2008

Paige Hoskinson-Olson
South Dakota State Historic Preservation Office
Review and Compliance Coordinator
900 Governors Drive
Pierre, South Dakota 57501-2217

RE: STB Finance Docket No. 33407, Dakota, Minnesota & Eastern Railroad Corporation Construction into the Powder River Basin Project: *A Level III Cultural Resources Evaluation of the Proposed Dakota, Minnesota & Eastern Railroad Corporation Powder River Basin Expansion Project Corridor, Huron Yard Locale, Beadle County, South Dakota* prepared by Archeology Laboratory, Augustana College (2007)

Dear Ms. Hoskinson-Olson:

Thank you for your May 20, 2008 comment letter regarding the above referenced survey report. In your letter, you stated that you do not concur with the Surface Transportation Board's (STB) determination that Site 39BE2003 is non-contributing and requested additional information regarding the site including its integrity, significance within the "South Dakota Railroad" context statement, and how the site would be impacted by the proposed undertaking.

As you know, Site 39BE2003 is an abandoned segment of the Chicago & North Western Railroad line situated immediately west of the old James Valley Junction. This railway line segment originally branched north off of the main line at the James Valley Junction and linked the communities of Huron and Broadland. In accordance with the South Dakota Railroad context regarding "Railway Structural and Engineering Features" (pp.41-46) we note that abandoned railway line segments like the one at 39BE2003 may be considered significant under Criterion A for their association with the history of a region, partly due to the historic scale of the line's original construction, but also by virtue of its historic influence, once constructed, on regional settlement and economic development. The segment represented by Site 39BE2003 was constructed during the

late 19th century as part of the Chicago & North Western Railroad's north-south line running through Huron and Aberdeen and thus qualifies as an important route within the railroad's primary network in eastern South Dakota.

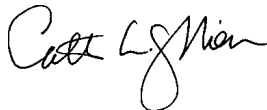
The grade segment represented by Site 39BE2003 has been abandoned but its remaining surface expression continues to convey the linear nature of the original property and follows its historic alignment. The rails, ties, and other associated elements have been removed; however, the absence of these materials on abandoned railway lines is not considered to diminish its historic association. As such, the property is judged to retain integrity of both location and setting.

Based on these considerations and in accordance with the South Dakota Railroad context, the STB wishes to revise its earlier determination that this railway line segment be considered non-contributing. Instead, we find that the portion of Site 39BE2003 located within the Area of Potential Effect (APE) should be considered eligible for listing in the National Register of Historic Places under Criterion A.

A portion of the rail segment is located within the project APE. Those sections of the line located within the APE would be directly impacted by the proposed construction activities and destroyed. Portions of the site outside the right-of-way may also be subject to indirect impacts.

If you have any further questions or comments regarding any of the above, please feel free to contact me at 202-245-0293 (gliddenc@stb.dot.gov) or David Bibler at 319-373-3043 (dbibler@louisberger.com). We look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read "Cath L Glidden".

Catherine Glidden
Section of Environmental Analysis

Cc: Herb Jones, DM&E
David Bibler, LBG