



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

October 14, 2020

Craig Potts, Executive Director
and State Historic Preservation Officer
Kentucky Heritage Council
The Barstow House
410 High Street
Frankfort, KY 40601

RE: Docket No. FD 36328, Ken Tenn Regional Rail Partners, Inc.—Construction and Operation Exemption—In Obion County, Tenn. and Fulton County, Ky; Request for concurrence of Area of Potential Effects and field survey plan

Dear Mr. Potts:

On behalf of the Surface Transportation Board's (Board) Office of Environmental Analysis (OEA), I am writing to request your concurrence on the area of potential effects (APE), as detailed below. I thank you for your response to my initial consultation letter dated February 28, 2020. Your response of March 9, 2020 (KHC # 57096-9) anticipated the need for both archaeological and cultural historic surveys and I hope you will be able to concur with our field survey plan and APE explained below.

As background, the Kenn Tenn Regional Rail Partners, Inc. (KTRRP or Applicant) filed a petition with the Board on September 2, 2020 for authority to construct and operate an approximately 12.17 miles of new rail line to between the Hickman-Fulton County River Port ("the Port") and Union City, Tennessee. The purpose of the new rail line would be to provide an additional and more cost-effective rail transportation option for agricultural and industrial shippers in the rural areas of southwest Kentucky and neighboring northwest Tennessee.

After screening seven possible alternatives, OEA concluded that two routes shown in the attached maps – Alternative 1 and Alternative 7 – merit analysis in the Draft Environmental Assessment and the Section 106 process of the National Historic Preservation Act, 54 U.S.C. § 306108. The enclosed reports for the Kentucky portion of the proposed project were prepared by Cultural Resource Analysts, Inc. (CRA) and consist of the following: 1) the findings from an archaeological desktop review and recommended sensitivity model and 2) a historic architectural resource records review and recommended APE.

For archaeological resources, CRA used a 300-foot wide study area for both alternatives to review and analyze previously recorded archaeological sites on file with the Kentucky Office

of State Archaeology. CRA found one previously recorded prehistoric village or open habitation archaeological site (15Fu6) potentially within or adjacent to the 300-foot Alternative 7 corridor. The review also included analysis of historical topographic maps along the proposed rail line routes and generated an archaeological site sensitivity rating model to identify high, moderate, and low probability areas for containing archaeological sites. The previously recorded site is adjacent to one of the high probability areas. Based on this research, OEA recommends that areas within the proposed routes be labeled as high probability and the recorded location of Site 15Fu6 be systematically surveyed for archaeological resources. OEA seeks your concurrence that this approach will meet Section 106 requirements as they pertain to archaeology.

For architectural resources, CRA's review analyzed previously recorded architectural resources within and adjacent to the proposed project area on file with the Kentucky Heritage Council (State Historic Preservation Office). The review also included analysis of historical topographic maps along the proposed rail line routes. Based on this research, local topography, and the linear nature of the proposed project, OEA recommends that the APE for the proposed project consist of a 1,000-foot buffer surrounding the proposed railroad alignment's centerline (500 feet to either side of the center of the proposed railroad alignment). The recommended APE encompasses the areas in which the proposed project may directly or indirectly affect historic properties.

We would appreciate your response regarding whether you concur with our suggested APE and the scope of our field survey work. To move the analysis forward, we look forward to hearing back from you by email no later than November 14, 2020. If you have any questions, please do not hesitate to contact Alan Tabachnick at 202-245-0367 or by email at Alan.Tabachnick@stb.gov or Diana Wood at 202-245-0302 or by email at Diana.Wood@stb.gov. Thank you for your valuable assistance.

Sincerely,



Victoria Rutson
Director
Office of Environmental Analysis

Cc: Yvonne Sherrick, Kentucky Heritage Council
Enclosures



October 5, 2020

Kent Evetts, PG
Environmental Manager
CSR Engineering
1116 Main Street
Pleasant View, Tennessee 37146

RE: Historic Architectural Resource Records Review
for Fulton County, Kentucky
CRA Project Number: K20C006
Contract Publication Series: 20-359

Dear Mr. Evetts,

The following letter provides the requested historic architectural resource records review for the proposed construction of a railroad route in Fulton County, Kentucky. The information was prepared for CSR Engineering. The letter report was prepared by Tim Condo of Cultural Resource Analysts, Inc. (CRA).

The proposed project is in the initial design stages; therefore, formal project plans have not yet been finalized. Currently being considered are a proposed preferred railroad route (Alternative 7, Revised Preferred Route) and one alternative route (Alternative 1, Kentucky). The preferred route begins in Fulton County at State Line Road, just west of KY 239, and travels generally north for approximately 0.7 mi. The preferred route then bears west-northwest to the south side of KY 166 then travels west along the south side of KY 166 before crossing KY 166 approximately 0.78 mi east-southeast of KY 116. The preferred route proceeds to travel along the north side of KY 166, crossing KY 2140 and linking with the Alternative 1, Kentucky, alternative route. The Alternative 1, Kentucky, alternative route begins at State Line Road in Fulton County. It generally bears north-northwest from State Line Road, running along the east side of KY 125 and crossing KY 2140, KY 166, and KY 1128. The alternative route then turns generally west-northwest, crossing KY 125, Montgomery School Road, and, after traversing approximately 1.88 mi of open land, crosses Myron Cory Road (KY 1463) before connecting with an existing rail line west of Myron Cory Road (KY 1463). Based on the nature of the proposed project, it was determined that, for the purposes of the historic architectural resource records review, the study area was defined as the project area and a 300 ft corridor centered on the preferred route and the alternative route (Figure 1). The study area was developed for the purpose of due diligence and to account for any possible direct and indirect effects to historic architectural resources located in the vicinity of the proposed project.

CRA submitted a records review request and an update to the request to the Kentucky Heritage Council (KHC) on July 27, 2020, and on August 11, 2020, respectively. The results (FY21-4022) and an update to the results were provided by the KHC on July 29, 2020, and August 13, 2020, respectively.

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The records review results indicate there are 11 previously surveyed resources located in the vicinity of the study area (FU 3, FU 4, FU 9, FU 38, FU 39, FU 40, FU 44, FU 47, FUH 2, FUH 7, and FUH 79); however, FU 39 and FU 44 represent the same resource and FUH 2 and FUH 7 represent the same resource (Table 1). For the purposes of this review, the two resources will be referred to as FU 44 and FUH 2, respectively. Additionally, there is a discrepancy with the indicated locations of three previously identified resources (FU 38, FU 40, and FUH 79) included in the KHC records review. The KHC inventory form for FUH 79 could not be located, and it is assumed from its KHC prefix of “FUH” that the resource is actually located outside the study area in Hickman, Kentucky. After examining the records review results and relevant survey forms, it is assumed the three resources (FU 38, FU 40, and FUH 79) are mapped incorrectly on the KHC records review and are not located in the vicinity of the study area for the proposed project. According to the KHC report, five of the remaining six previously surveyed resources (FU 3, FU 4, FU 9, FU 44, and FU 47) have an undetermined National Register of Historic Places (NRHP) status, while one previously recorded resource (FUH 2) was demolished prior to 1989 and has an NRHP status of demolished. A review of recent aerials indicates that the resources associated with FU 4, FU 44, and FUH 2 are no longer extant. Of the nine resources identified in the KHC reports, only FU 3, FU 9, and FU 47 are adjacent to the study area for the current project. At this time, it is unclear if FU 9 remains extant.

The majority of the previously surveyed resources are concentrated along KY 125. Exceptions include FUH 2, which is no longer extant and was located on Myron Cory Road (KY 1463), and FU 9, which is located near the intersection of KY 239 and State Line Road if it is extant. Of the extant previously surveyed resources (FU 3, FU 9, and FU 47), FU 3 is approximately 650 ft east-southeast of the intersection of KY 125 and KY 1128, FU 9 may be located approximately 250 ft north of the intersection of KY 116 and Jordan Lane, and FU 47 is situated on the east side of KY 125, at the intersection of KY 125 and KY 2140. The study area for the proposed project appears to overlap portions of the properties on which FU 9 and FU 47 are located (see Figure 1).

No cultural historic reports with an associated study area within or in the vicinity of the current study area were identified during the records review.

In addition to the file search, archival research included a review of available maps, used to help identify potential historic structures within the study area for the proposed project. The following maps were reviewed:

- 1939 Hickman, Kentucky, Missouri, and Tennessee, 15-minute series topographic quadrangle (War Department Corps of Engineers [WDCE] 1939);
- 1947 General Highway Map, Fulton County, Kentucky (Kentucky Department of Highways [KDH] 1947);
- 1951 Cayce, Kentucky, Tennessee, 7.5-minute series topographic quadrangle (United States Geological Survey [USGS] 1951a);
- 1951 Hickman, Kentucky, Missouri, 7.5-minute series topographic quadrangle (USGS 1951b);
- 1954 Hickman, Kentucky, Missouri, and Tennessee, 15-minute series topographic quadrangle (USGS 1954);
- 1956 General Highway Map, Fulton County, Kentucky (KDH 1956);
- 1970 Cayce, Kentucky, Tennessee, 7.5-minute series topographic quadrangle (USGS 1970a); and
- 1970 Hickman, Kentucky, Missouri, 7.5-minute series topographic quadrangle (USGS 1970b).

A review of historical maps indicates that the majority of the historic resources in the vicinity of the study area were scattered along principal roadways, which include multiple state highways such as KY 125, KY 2140, KY 1128, and KY 1463. The study area and its vicinity were historically rural in character and consisted of low-density, residential development and farmsteads. The same general character is present today. The 1939 Hickman, Kentucky, Missouri, and Tennessee, 15-minute series topographic quadrangle indicates that the vicinity of the revised preferred route was particularly sparsely developed, except for the area just north of the intersection of KY 166 and KY 1127, which appears to have contained a cluster of

residences or farming-related buildings. The same map depicts the Sylvan Shade School, east of the preferred route and the alternative route, near the intersection of KY 2140 and KY 1128, and the Montgomery School, west of the preferred route and the alternative route, near the intersection of Montgomery School and Jordon Roads. The Mount Harmon Church is indicated east of the preferred route and the alternative route, on the east side of KY 2140. A previous iteration of the Poplar Grove Church (FU 3) is also shown (WDCE 1939). The Nashville, Chattanooga, and St. Louis Railroad, (N, C, and St. L.) historically intersected the study area but was abandoned by the mid-1950s (USGS 1954; WDCE 1939). FU 9, if still extant, is located in the small rural community of Jordan just north of KY 116 (State Line Road) and west of KY 239 along Jordan Lane. This was once a lively rural community with a number of commercial establishments and was closely associated with the former Gulf Mobile and Ohio Railroad line. The community's post office was established in 1862 as Fulton Station. The community was nearly decimated by a fire in 1921 (Rennick 2016). FU 47 is indicated on historical maps as the State Line Station (WDCE 1939; KDH 1947; USGS 1951a). Development in the vicinity of the study area remained relatively static throughout the mid- to late twentieth century, but historical maps depict scattered residences along KY 125 that appear to be on parcels overlapped by the study area (USGS 1951a, 1951b, 1970a, 1970b). In addition, a filtration plant located near the western terminus of the study area was constructed between 1951 and 1970 (USGS 1951b, 1970b).

In conclusion, the KHC records review indicated that there are 11 previously surveyed resources located in the vicinity of the study area (FU 3, FU 4, FU 9, FU 38, FU 39, FU 40, FU 44, FU 47, FUH 2, FUH 7, and FUH 79); however, FU 39 and FU 44 represent the same resource and FUH 2 and FUH 7 represent the same resource (see Table 1). Additionally, there is a discrepancy with the indicated locations of three previously identified resources (FU 38, FU 40, and FUH 79) included in the KHC records review. After examining the records review results and relevant survey forms, it is assumed the three resources (FU 38, FU 40, and FUH 79) are mapped incorrectly on the KHC records review and are not located in the vicinity of the study area for the proposed project. The KHC records review also indicated one of the remaining six previously surveyed resources (FUH 2) has an NRHP status of demolished. A review of recent aerials indicates that the resources associated with FU 4, FU 44, and FUH 2 are no longer extant. Of the nine resources identified in the KHC records review, only three previously identified sites (FU 3, FU 9, and FU 47) are adjacent to the study area. The study area may overlap portions of the properties on which the sites FU 9 and FU 47 are located. At this time, it is unclear if FU 9 remains extant. According to the KHC Geographic Information Systems (GIS) database, there are no previously identified NRHP-listed or NRHP-eligible sites located in or adjacent to the study area.

Historic maps also identified the potential for previously unidentified resources located within the study area. Further research and field investigations would be necessary to confirm the conditions and locations of other historic architectural resources and possible NHRP-eligible properties that may be affected by the proposed project.

If you have any questions, please do not hesitate to contact me.

Sincerely,



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Table 1. Previously Recorded Cultural Historic Sites in the Vicinity of the Study Area.

KHC Survey No.	Name	NRHP Status on KHC GIS	Aerial Review
FU 3	Poplar Grove Church	Undetermined	Extant
FU 4	Elijah Maddox House	Undetermined	Non-extant
FU 9	Miles House	Undetermined	Extant
FU 38	House (Farm)	Undetermined	Incorrectly mapped/not in or adjacent to study area
FU 40	House	Undetermined	Incorrectly mapped/not in or adjacent to study area
FU 44/FU 39	Asa W. Clark and Lavinia Sneed House/Rose House	Undetermined	Non-extant
FU 47	State Line Depot	Undetermined	Extant
FUH 2/FUH 7	Tyler House	Demolished	Non-extant
FUH 79	Hickman Cemetery Gate	Undetermined	Incorrectly mapped/not in or adjacent to study area

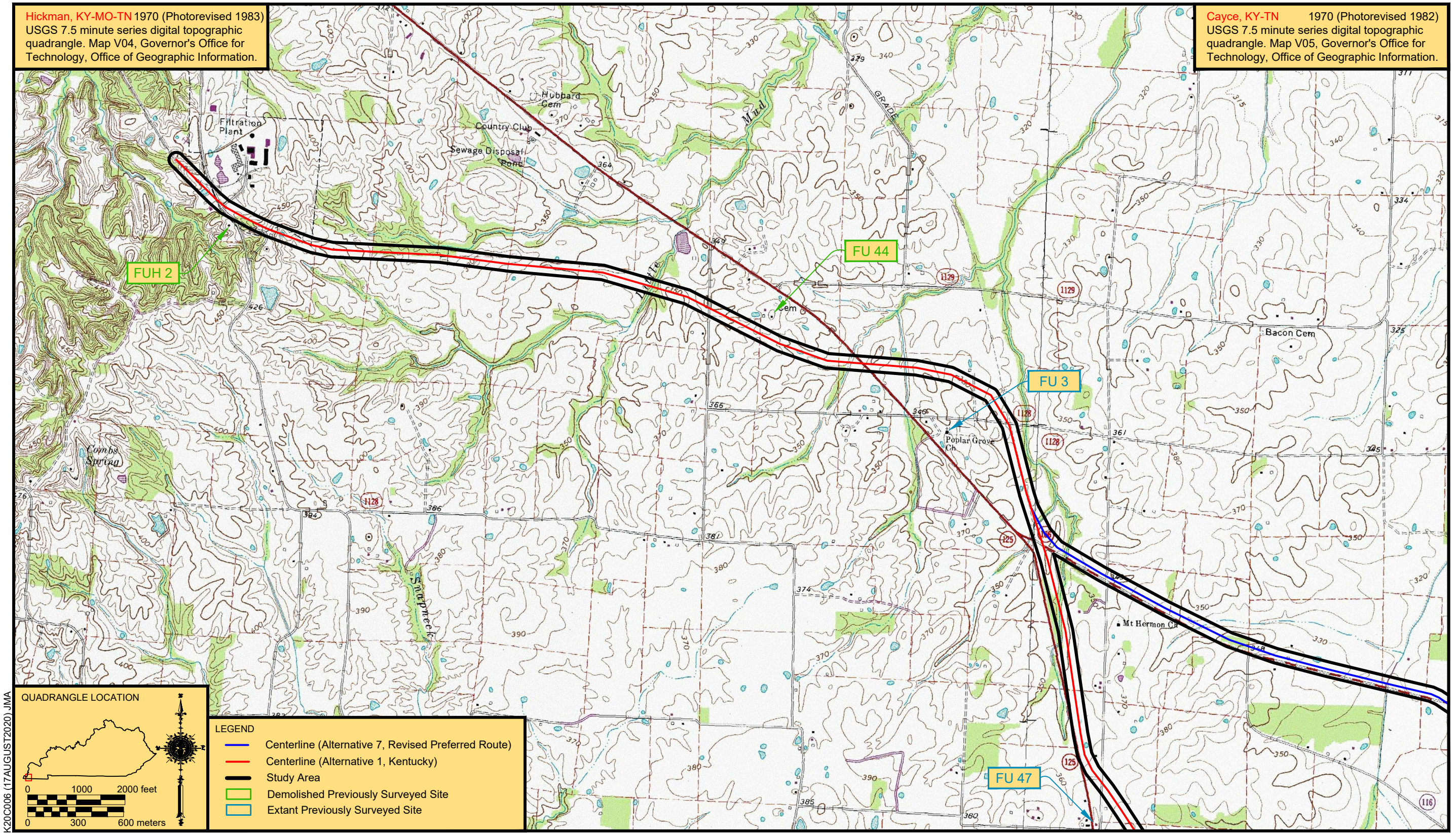
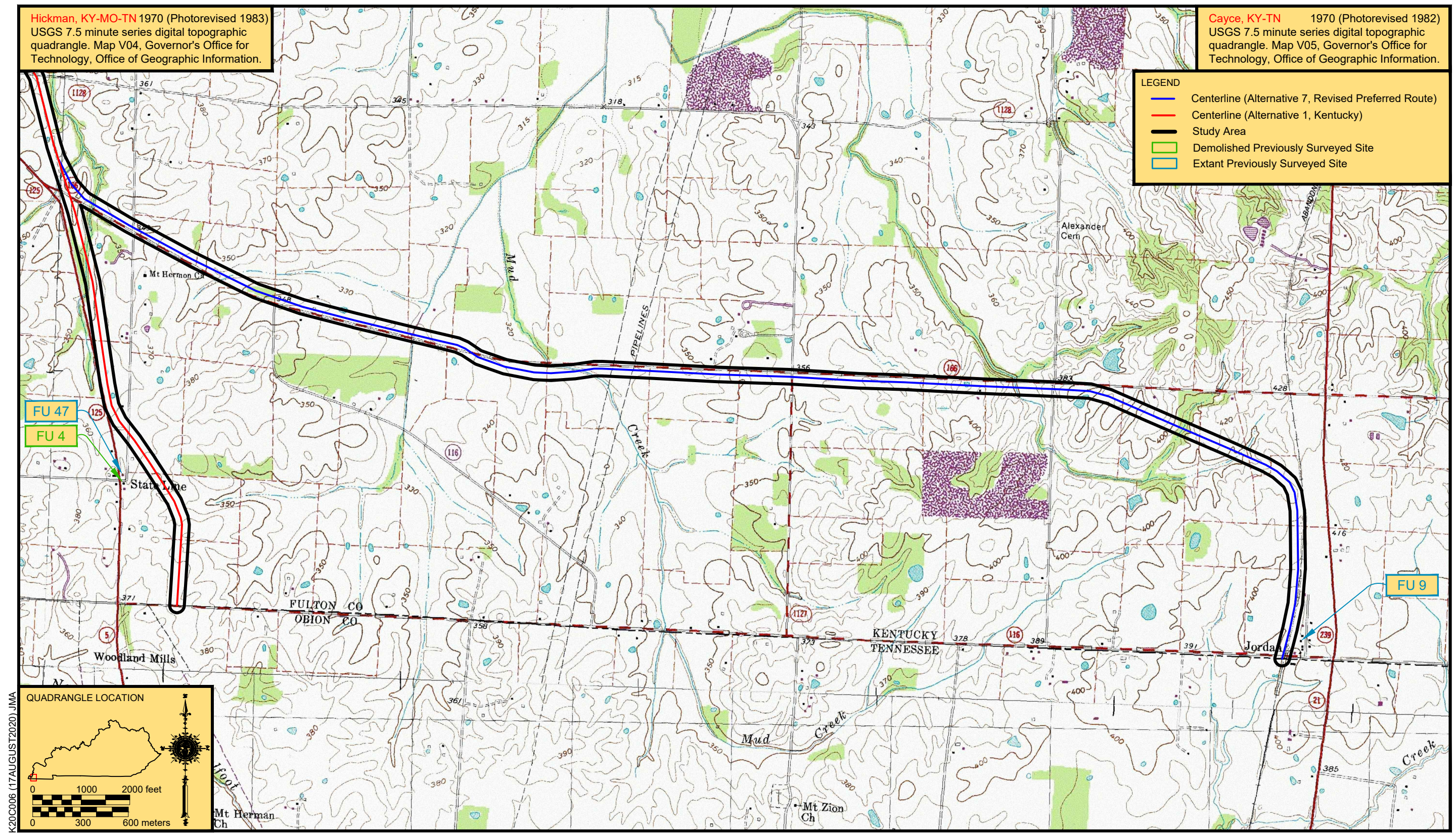


Figure 1a. Topographic quadrangle map depicting the study area, preferred route, alternative route, and KHC records review results.



Bibliography

Kentucky Department of Highways (KDH)

1947 General Highway Map, Fulton County, Kentucky. Prepared in cooperation with the United States Department of Commerce, Bureau of Public Roads. Kentucky Department of Highways, Frankfort, Kentucky.

1956 General Highway Map, Fulton County, Kentucky. Prepared in cooperation with the United States Department of Commerce, Bureau of Public Roads. Kentucky Department of Highways, Frankfort, Kentucky.

Rennick, Robert M.

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United States Geological Survey (USGS)

1951a Cayce, Kentucky, Tennessee, 7.5-minute series topographic quadrangle. United States Department of the Interior, Washington DC.

1951b Hickman, Kentucky, Missouri, 7.5-minute series topographic quadrangle. United States Department of the Interior, Washington DC.

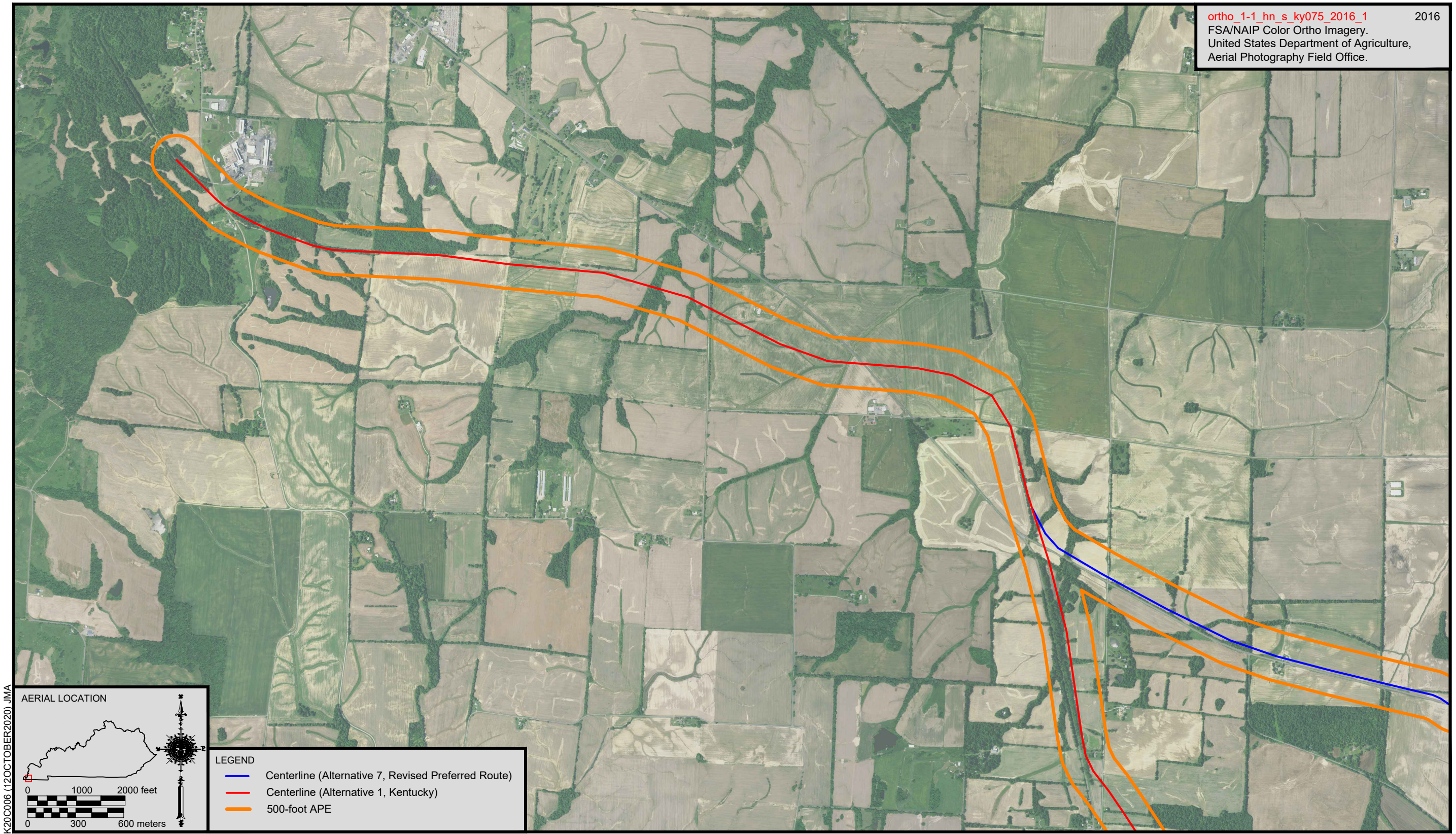
1954 Hickman, Kentucky, Missouri, and Tennessee, 15-minute series topographic quadrangle. United States Department of the Interior, Washington DC.

1970a Cayce, Kentucky, Tennessee, 7.5-minute series topographic quadrangle. United States Department of the Interior, Washington DC.

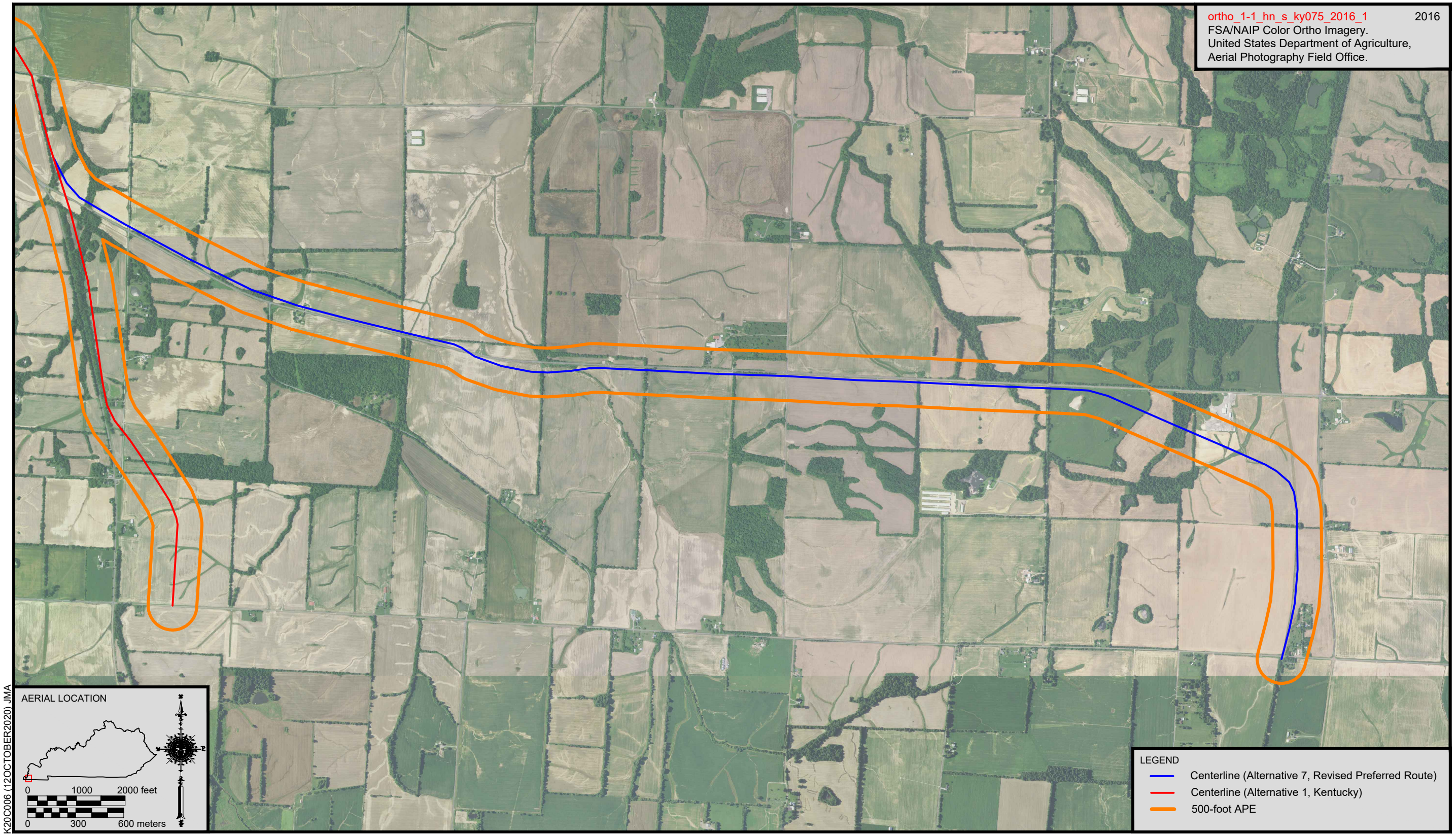
1970b Hickman, Kentucky, Missouri, 7.5-minute series topographic quadrangle. United States Department of the Interior, Washington DC.

War Department Corps of Engineers (WDCE)

1939 Hickman, Kentucky, Missouri, and Tennessee 15-minute series topographic quadrangle. Prepared under the direction of the President, Mississippi River Commission, Vicksburg, Mississippi.



Aerial map showing 500' buffer - Map 1



Aerial map showing 500' buffer - Map 2