



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

October 14, 2020

Patrick McIntyre
Executive Director and State Historic Preservation Officer
Tennessee Historical Commission
State Historic Preservation Office
2941 Lebanon Pike
Nashville, TN 37214

**RE: STB 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. McIntyre:

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 12, 2020 anticipated the need for both archaeological and cultural historic surveys and I hope you will be able to concur with our APE and field survey plan 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 Tennessee 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 Tennessee Division of Archaeology. 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. Based on this research, it is recommended that areas within the two proposed routes labeled as high probability be systematically surveyed for archaeological resources. OEA seeks concurrence from your office 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 Tennessee Historical Commission (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, the recommended APE for the proposed project is 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 proposed 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: Casey Lee, Tennessee Historical Commission
Enclosures



October 6, 2020

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

RE: Historic Architectural Resource Records Review
for Obion County, Tennessee
CRA Project Number: T20C012
Contract Publication Series: 20-358

Dear Mr. Evetts,

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

The proposed project is in the initial design stages, and therefore formal project plans have yet to be developed. This records review addresses a proposed preferred railroad route (Alternative 7, Revised Preferred Route) and one alternative route (Alternative 1, Tennessee). The preferred route follows the route of an existing railroad line, originally established in 1854 as part of the Mobile and Ohio Railroad, later operated by the Illinois Central Railroad; portions of the line are currently abandoned. 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 a 300 ft corridor centered on each of the two routes (Figure 1). The study area was developed for the purpose of due diligence and to account for any possible direct and indirect effects on historic architectural resources located in the vicinity of the proposed project.

CRA conducted a records review through the Tennessee Historical Commission (THC), facilitated by Peggy Nickell, Historic Preservation Specialist. Due to Covid-19, the offices of the THC were closed to the public, and the records review was accomplished via an examination of the online THC Viewer and email correspondence. The THC Viewer indicated that there were no previously surveyed resources located within the vicinity of the study area (Figure 2) (tnmap.tn.gov 2020a). According to Ms. Nickell, this portion of Obion County has never been surveyed. In addition, documents held in the THC files indicated that no resources in the vicinity of the study area have been recommended for listing or are currently listed in the National Register of Historic Places (NRHP). A review of the NRHP online map confirmed that there are currently no NRHP-listed resources in the vicinity of the study area (National Park Service 2014).

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.

1870 Map of Civil Districts in Obion County (TNGenWeb Project)

1931 "Map of Obion County, Tennessee, Showing Rural Delivery Service" (United States Post Office Department)

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1954 Union City, Tennessee, 7.5-minute topographic quadrangle (United States Geological Service [USGS])

1954 (Photorevised 1980) Union City, Tennessee, 7.5-minute topographic quadrangle (USGS)

The study area and surrounding vicinity historically were characterized by farmsteads and low-density, rural residential development. Located approximately 0.25 mi to the west of the study area is the town of Woodland Mills. Located approximately 2 mi south of the study area is the town of Union City, which is the county seat of Obion County. Historic maps indicated that resources over 50 years old in the vicinity of the study area were scattered, primarily concentrated along roadway alignments.

A review of historic maps, current aerial photographs, and information available on the Tennessee Property Viewer shows the potential for approximately eight previously unidentified architectural resources that are over 50 years old within the study area or on parcels that extend into the study area (tnmap.tn.gov 2020b). Six of the architectural resources are located on parcels that extend into the study area of Alternative 1, Tennessee; three of these resources front on Armstrong Boulevard and are within 10–60 ft of the study area's boundary, and the other three are approximately 0.1–0.4 mi from the study area. Two of the architectural resources are associated with the Alternative 7, Revised Preferred Route; one of these resources is situated within the study area, near the Tennessee-Kentucky state line, and the second resource is situated approximately 0.6 mi from the study area near the juncture of the preferred route and the alternative route. The current conditions and potential significance of these resources is unknown at this time.

Further research and field investigations would be necessary to confirm the conditions and locations of architectural resources and possible NRHP-eligible properties that may be affected by the proposed project.

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

Sincerely,

A handwritten signature in cursive script that reads "Jenny Andrews".

Jenny Andrews
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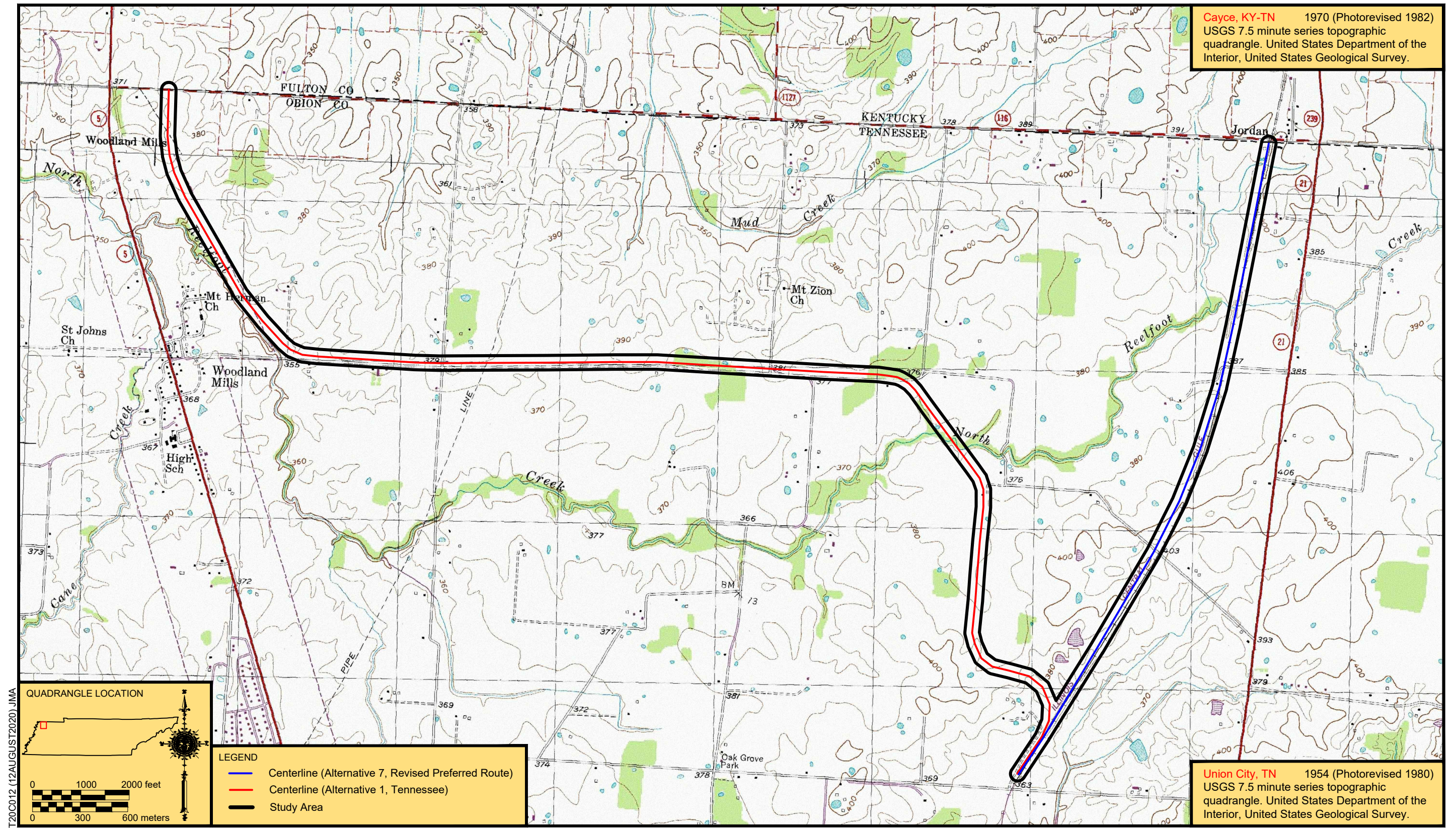


Figure 1. Topographic quadrangle map depicting the proposed project and the study area.

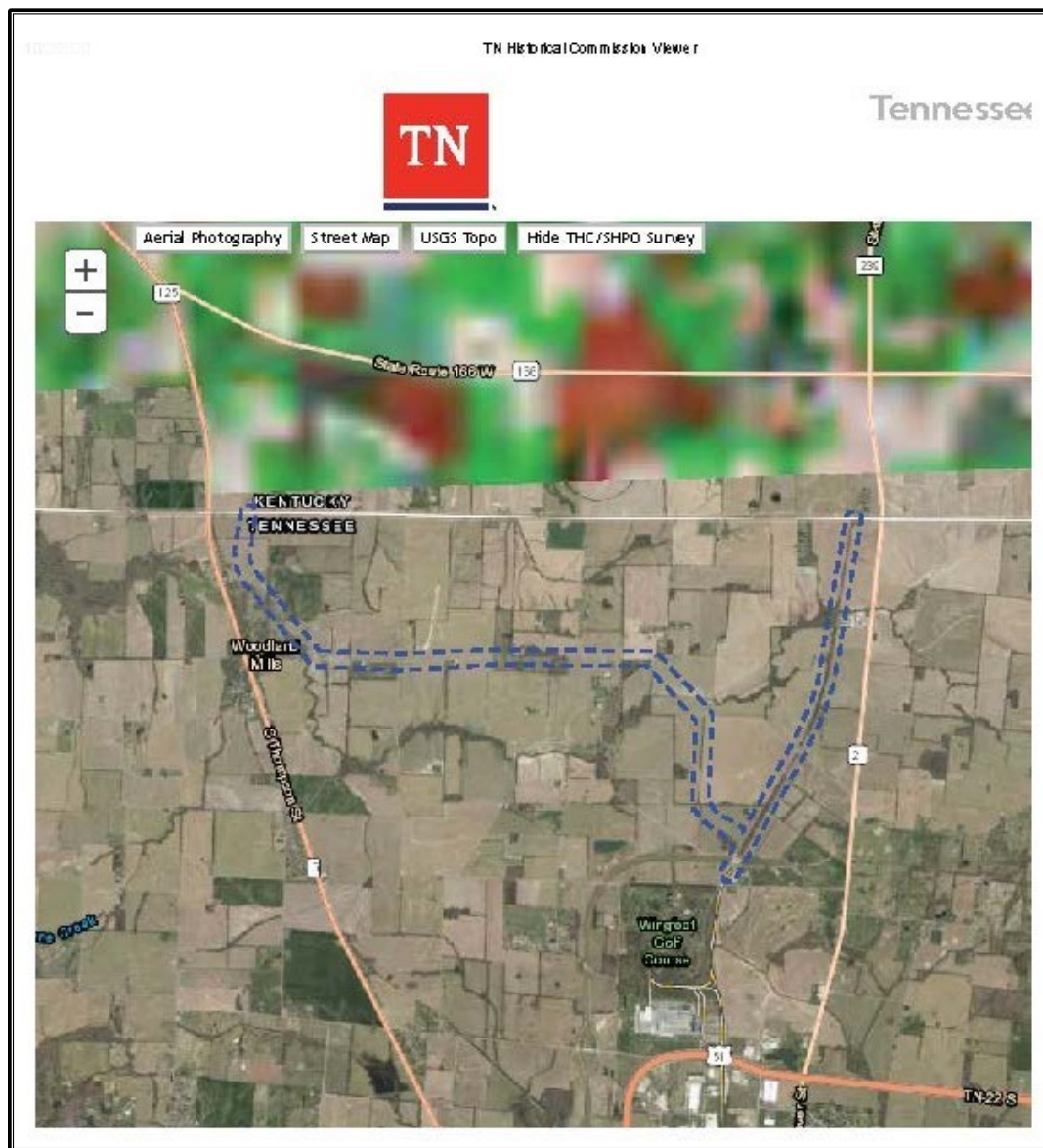


Figure 2. Aerial map from the THC Viewer showing no previously recorded resources in the vicinity of the study area.

Bibliography

National Park Service

2014 “National Register of Historic Places.” Electronic document, nps.gov/maps/full.html, accessed August 10, 2020.

TNGenWeb Project

1870 Map of Civil Districts in Obion County, Tennessee. Electronic document, tngenweb.org/obion/, accessed July 28, 2020.

Tnmap.tn.gov

2020a Tennessee Historical Commission Viewer. Electronic document, tnmap.tn.gov/historical/commission/, accessed July 27, 2020.

2020b Tennessee Property Viewer. Electronic document, tnmap.tn.gov/assessment/, accessed July 28, 2020.

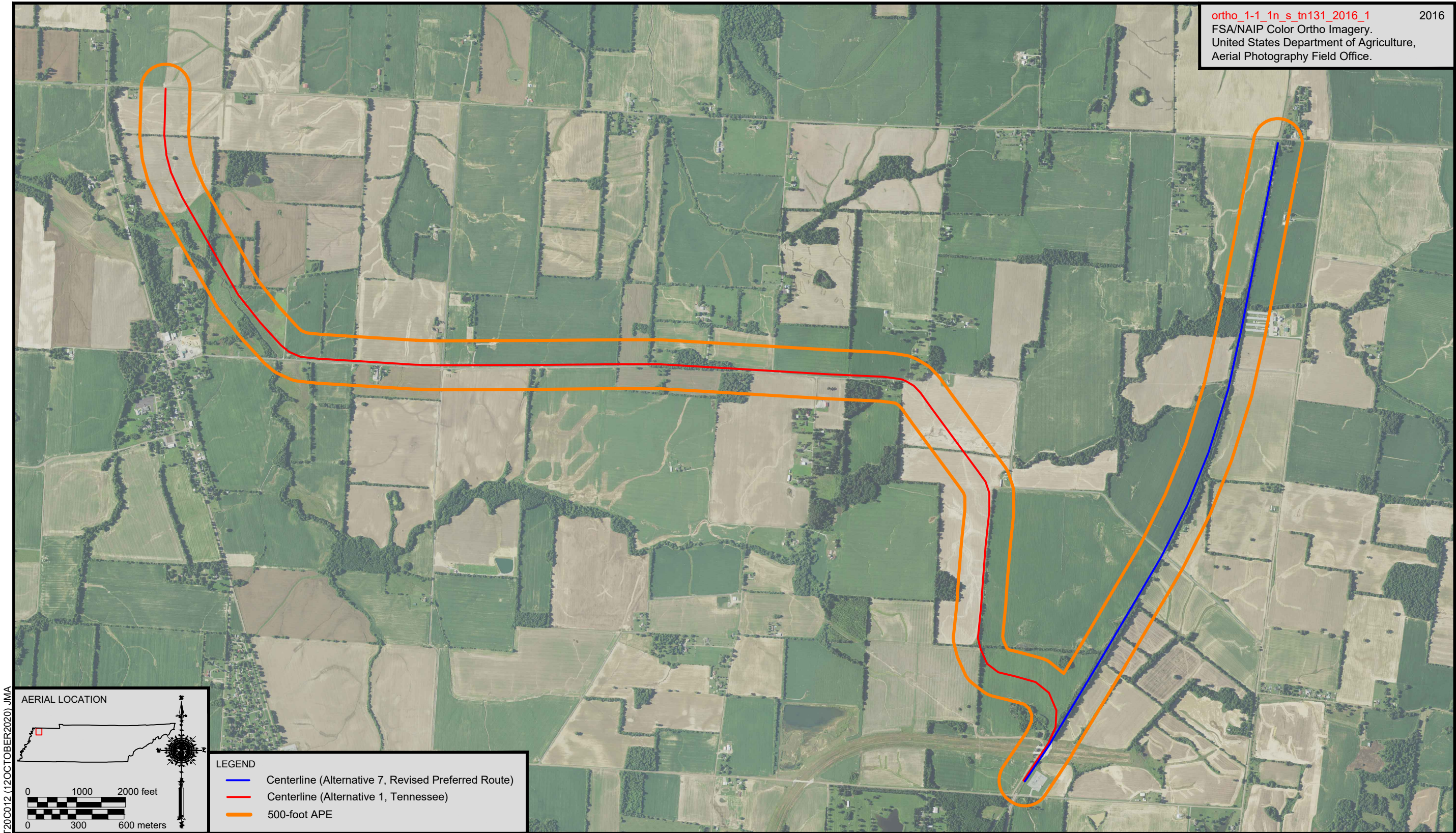
United States Geological Survey (USGS)

1954 Union City, Tennessee, 7.5-minute series topographic quadrangle. United States Department of the Interior, Washington, DC.

1954 (Photorevised 1980) Union City, Tennessee, 7.5-minute series topographic quadrangle. United States Department of the Interior, Washington, DC.

United States Post Office Department

1931 “Map of Obion County, Tennessee, Showing Rural Delivery Service,” United States Post Office Department, Washington, DC. Tennessee State Library and Archives [TSLA] Map Collection, ID No. 34961.



Aerial map showing 500' buffer