

From: [Higginbottom, Daniel](#)
To: [Gosselin, Danielle](#); [Unknown Unknown](#); [Sara Andre](#); [Heather Gibb](#)
Subject: 190117026-STB-Cerro Gordo-Iowa Traction Railway Company-STB Docket # AB-1269X-Propose Rail Line Abandonment Project
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April 1, 2019

190117026-STB-Cerro Gordo-Iowa Traction Railway Company-STB Docket # AB-1269X-Propose Rail Line Abandonment Project

Ms. Gosselin,

We have received a copy of the Draft Historic Report and summary Environmental Assessment (EA) prepared for the above-referenced federal undertaking and provide the following response in accordance with section 106 of the National Historic Preservation Act of 1966 and its implementing regulations 36 CFR 800.

Upon completing a cursory review of the documentation provided, we find no basis for the stated conclusion that there are not likely to be archaeological sites located within the abandonment corridor. The historic report fails to establish a clear area of potential effect (APE), consult authoritative sources, or utilize existing data sets in the identification of historic properties (36 CFR 800.4). Consequently, in these regards, the existing documentation does not meet the standards established at 36 CFR 800 and therefore could not be used to support an agency determination of effect.

We look forward to receiving substantive documentation and entering into formal consultation with your agency regarding this undertaking in the near future.

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