

February 10, 2010



P.O. Box 761, Jackson CA 95642

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*"Preserving the
past and present
for tomorrow."*

(1-15-2010)

Christa L. Dean, Attorney
Surface Transportation Board
395 E Street, SW
Washington D.C. 20423

RE: Docket No. AB-512X Abandonment Exemption in Amador County, California

Dear Ms. Dean:

The *Amador County Historical Society* (ACHS) is named in the MOA between the STB, *Sierra Pacific Industries* (SPI), and the CA SHPO regarding STB Docket No. AB-512X Abandonment Exemption in Amador County, California, as a recipient of specific documents and documentation in accordance with the stipulations of this agreement. ACHS would like to provide you with an update of the materials that we have received and also provide some comments regarding the agreement document.

ACHS comments/updates are as follows by stipulation:

Stipulation I.A.1.: SPI provided ACHS black and white contact sheets and black and white 4"x 6" prints as required in this stipulation. The contact sheets identified the images as TIF files and the prints identified the files as JPG files. Duplicate prints of the following images were provided: 1637, 1638, 1639, 1641, 1642, 1643, 1645, 1646, 1647, 1648, 1650, 1651, 1652, 1653, and 1654. ACHS would be happy to return the extra prints to SPI. ACHS would like to request electronic copies of the TIF images on an Archival Gold CD. If TIF images are not available, then JPG images would be acceptable.

Stipulation I.A.6.: This stipulation states that "All buildings and their contents of historic value in the current Martell Station will be donated to the Amador County Museum (ACM), provided that the ACM removes any property that it wants within four months of the date that this MOA is executed." The ACM is owned by Amador County (AC) and in May 2008 was operated by AC. AC closed the Museum in July 2008 and the ACM remains closed today. There is a footnote that on December 19, 2007 SPI offered to convey the buildings in Martell to the ACHS. ACHS has no written record of that offer. The stipulation requires that the offer was to be made to the ACM. Is there documentation of the offer to ACM and an official response? Would you provide copies of these documents to the ACHS?

Stipulation I.A.7.: This stipulation lacks specificity in that it does not describe the location for the marker or plaque, nor does it provide requirements describing an appropriate size or review process. ACHS has provided comments regarding the proposed location of the plaque and is willing to continue to discuss the location and a review process with the STB, the CA SHPO, and SPI.

The material that SPI is required to provide to the ACHS in this stipulation includes photographs, video documentation, blueprints, and maps. ACHS received copies of photographs that are of archival quality. Since video is electronic recordation, ACHS assumes that the video documentation is of the portions of the historic property that were specified in the MOA for removal; this has not been provided. SPI indicated in a recent email that they will provide video documentation to ACHS in the near future. Any video recording of the resource should be completed by a professional videographer that has a background in video recordation for HABS/HAER. If the video recording of the buildings, track and other features were not made prior to the removal of the rails, then the video documentation of the resource fails to provide a complete record of the resource.

ACHS previously informed STB and the CA SHPO that track was being removed prior to the fulfillment of the stipulations of the MOA. Visual inspections verify that significant portions of track have been removed. Please find included current photos of some sections of removed trackage. ACHS noted that the MOA states:

1. In a decision on March 6, 2006, the Board made it clear that SPI must not file its consummation notice or initiate any salvage activities related to abandonment until the Section 106 process has been completed and the Board has removed this condition; and
2. Once the mitigation measures are complete and the SHPO is notified, the Board will notify SPI that it may commence with removal of the rail line and structures. If the reference to video documentation included digital recordings taken from films of the operating

Email/ info@achs1948.org or telephone/ 209-257-1485

railroad, ACHS would be interested in receiving that documentation because it is another method for recording the railway. ACHS is not interested in blueprints because of the short lifespan of documents produced by this process. ACHS requests that copies of the photographs, video documentation, drawings and maps be provided on archival quality materials (paper, CD, etc.). ACHS requests that electronic copies of all materials (images, video, drawings and maps) be provided on Archival Gold CD. Additional comments regarding the report are made under Stipulation IV.A.

Stipulation II.: This stipulation indicates that the STB will consider all discoveries to be eligible for the National Register of Historic Places. This condition does not indicate that there will be any monitoring by a qualified historic archeologist or other mechanism for identifying discoveries during the removal of the historic property. Could STB please explain what mechanisms will be in place to identify discoveries? ACHS would be willing to cooperate with the CA SHPO, the STB, and SPI on developing mechanisms, such as monitoring, for identifying discoveries.

Stipulation IV.A: The HABS/HAER report describes the architectural information by A.) General Statement, B.) Description of Exterior, C.) Description of Interior, and D.) Site. Sections A, B, and C segment the descriptions of each of the buildings into elements rather than providing a detailed description of each building as a unit. This makes the report difficult to understand. A clear description of each building and its architectural elements would make the report easier to understand. This would be consistent with guidelines for descriptions provided in National Register of Historic Places Nomination Forms and HABS/HAER recordation.

In the HABS/HAER report description of the site (Section D), the first subsection is Historic Landscape Design. The description in the report focuses on plantings/ornamental landscaping rather than a more encompassing view of the built environment landscape. The Historic Landscape Design description would be more useful if it included a landscape design of the facility as a whole, detailing the design of the entire station area with plantings/ornamental landscaping being just part of the overall landscape design.

ACHS assumes that the historic property is being recorded at HABS/HAER Documentation Level III; requiring (1) Drawings: sketch plan; (2) Photographs: photographs with large-format negatives of exterior and interior views; and (3) Written data: architectural data form. ACHS does not believe that the drawings or sketch plan are of sufficient scale to identify specific buildings or their dimensions. No architectural data forms were attached to the report that ACHS received. There were no historic photographs included in the record that depict the buildings during the period of significance. Having both the historic photographs and the photographs of the existing somewhat dilapidated buildings would provide a more meaningful HABS/HAER record.

The photographs of the buildings are limited in that they do not show much of the architectural details. For example, the ticket window can be seen on an interior photo, but does not appear on an exterior photo. The connections of these types of details are lost in this record. There are no drawings of the buildings and structures that give a complete record of the eligible features that are to be removed.

The index to photos helps to identify the location and direction of each of the photographs. If this is intended to constitute a detailed recording of the section of rail to be removed, the photographs present a limited recording of the resource. A map of the area with photo points and direction of the photos would be extremely useful and represent a detailed record of the railroad and buildings to be removed.

Attachment D of the report does not appear to be on a 1:1 scale. Some of the text is not readable because of the small size or quality of the reproduction. This is especially important for the Martell Depot area. The names of buildings are very difficult to read, and the actual size of the buildings is vague at this scale. If these maps are not a 1:1 scale, please provide maps for this attachment at a 1:1 scale. If these maps are at a 1:1 scale, then more detailed maps of the Martell Depot area are needed. Also, it is extremely important to document the location of buildings and structures that were constructed during the period of significance but no longer exist. Documentation of the locations of buildings and structures that are no longer extant should be in the photographic record as well as historic photographs of those buildings and structures, if available, to adequately document the depot area. The photo documentation should include the resources current condition as well as their condition during the period of significance.

A letter from Historic Resource Associates (HRA) was provided with the report sent to ACHS by SPI. The letter states that the report provided by HRA was not provided on archival paper. ACHS understands that the

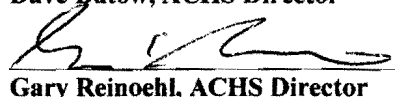
CA SHPO reviewed the report in December of 2008 and received another copy in January of 2009 (personal communication with Mark Beason, Feb. 1, 2010). It is unclear to ACHS if a final report was completed by HRA and if the copy provided to the ACHS is the final or a draft. If it is a final, ACHS requests that SPI provide a copy of the transmittal letter from HRA stating that this is the final copy. ACHS would like a copy of the final report that has been reproduced on archival quality paper with archival quality inks/toners, along with electronic copies of the documents on Archival Gold CD.

ACHS requests STB direct SPI to send to the Amador County Archives and to the Amador County Library copies of all materials provided to ACHS under Stipulations I.A.1, I.A.6, and IV.A. ACHS respectfully requests that STB consider our comments on the MOA and the manner in which it is being fulfilled. If ACHS has inaccurate information or has inaccurately interpreted the stipulations of the MOA, ACHS would appreciate clarification on those points. ACHS looks forward to working with STB, the CA SHPO, and SPI to complete the fulfillment of the stipulations of the MOA.

Respectfully,

 2/10/10
Larry Cenotto, ACHS President Date

 2/11/10
Dave Butow, ACHS Director Date

 2/10/10
Gary Reinoehl, ACHS Director Date

CC:

Wayne Donaldson, SHPO
ATTN: Mark Beason
California Office of Historic Preservation
P.O. Box 942896
Sacramento, CA 94296-0001

Advisory Council on Historic Preservation
1100 Pennsylvania Avenue NW, Suite 803
Old Post Office Building
Washington, DC 20004

E.M. Emmerson
Sierra Pacific Industries
P.O. Box 496028
Redding, CA 96049-6028

Dave Brown
Sierra Pacific Industries
3950 Carson Road
Camino, CA 95709

Amador County Board of Supervisors
Brian Oneto, Chairman
810 Court Street
Jackson, CA 95642-2132

Amador County Historical Society, Established 1948, PO Box 761, Jackson, CA 95642
Office-Visitors Center-Exhibit & Meeting Hall at No.1 Main St., Phone 209-257-1485

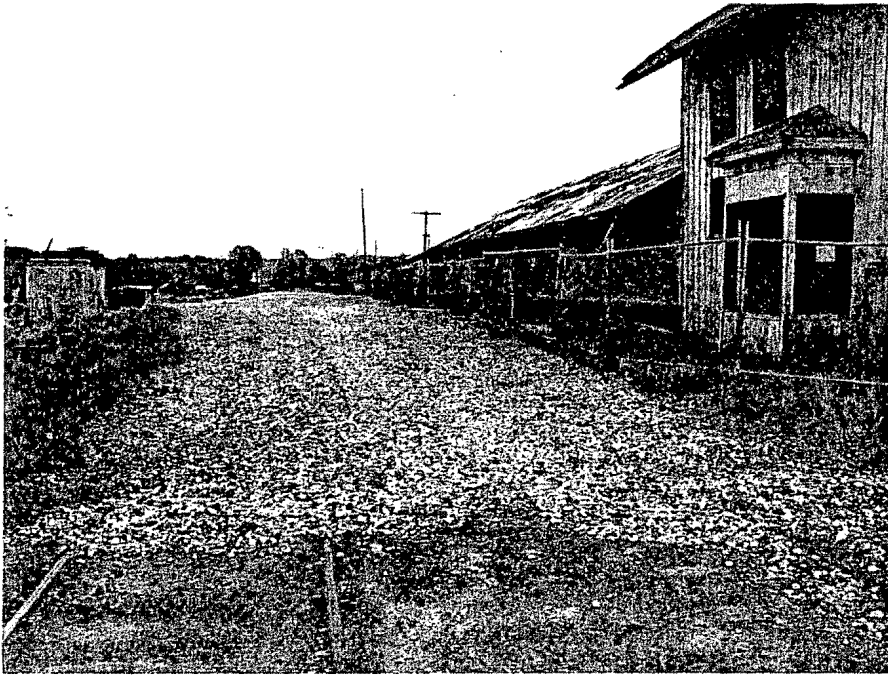


Photo 1: Looking east from road at west end of Martel Depot.



Photo 2: Looking east from Hwy 49 crossing, Martel Depot in background.

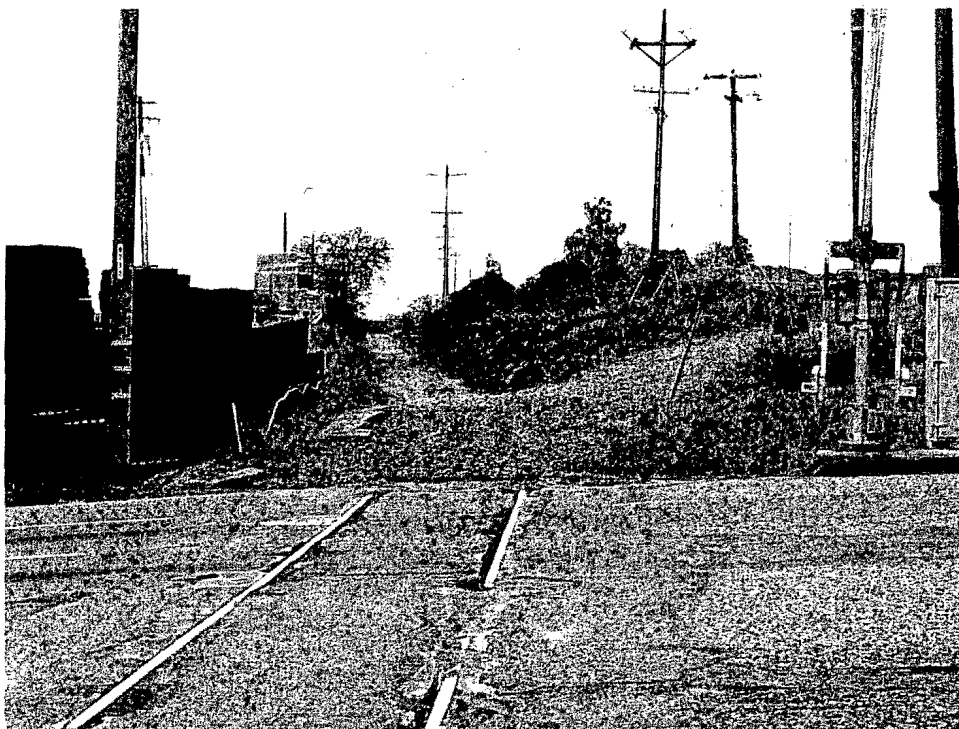


Photo 3: Looking west at "Y" from Hwy 49. Railroad right of way to right goes toward area of old SPI plant.



Photo 4: Looking east from area across Hwy 88 from Dollar Store.

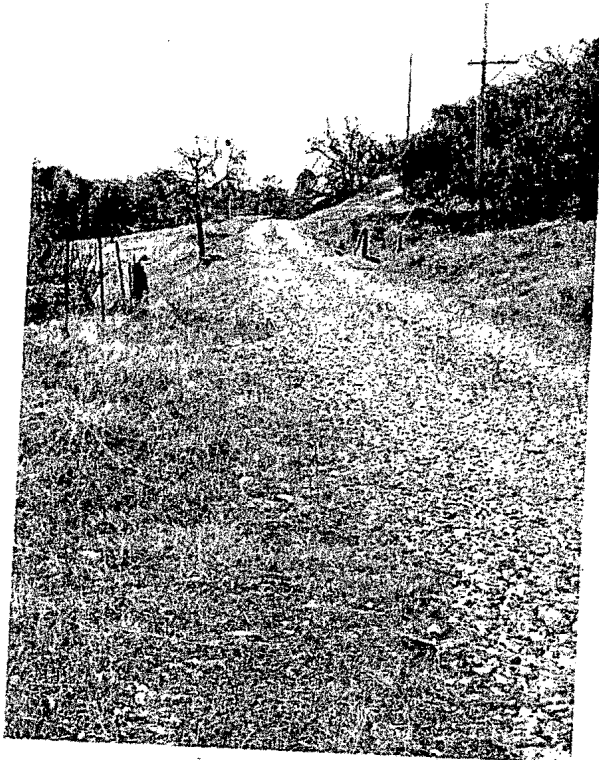


Photo 5: Looking west from west of area across Hwy 88 from Dollar Store.

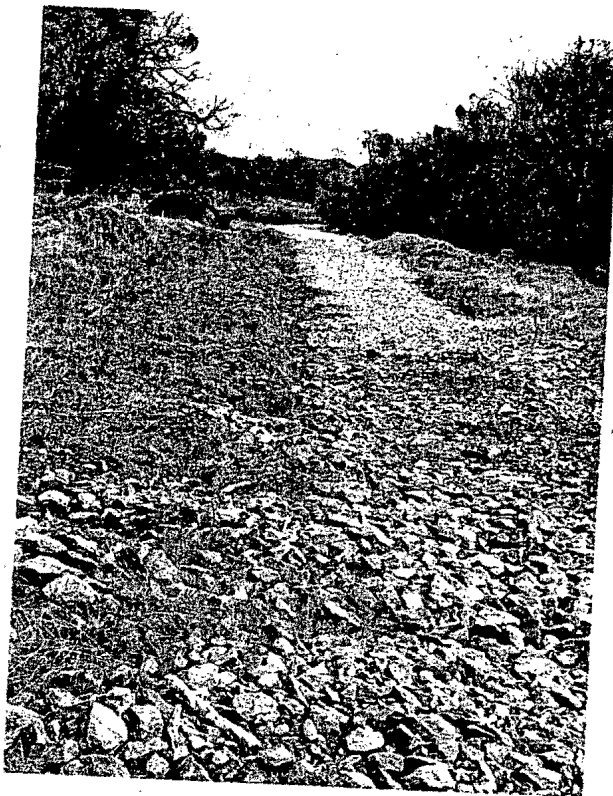


Photo 6: Looking east from Boxcar Blvd.



Photo 7: Looking west from Boxcar Blvd.

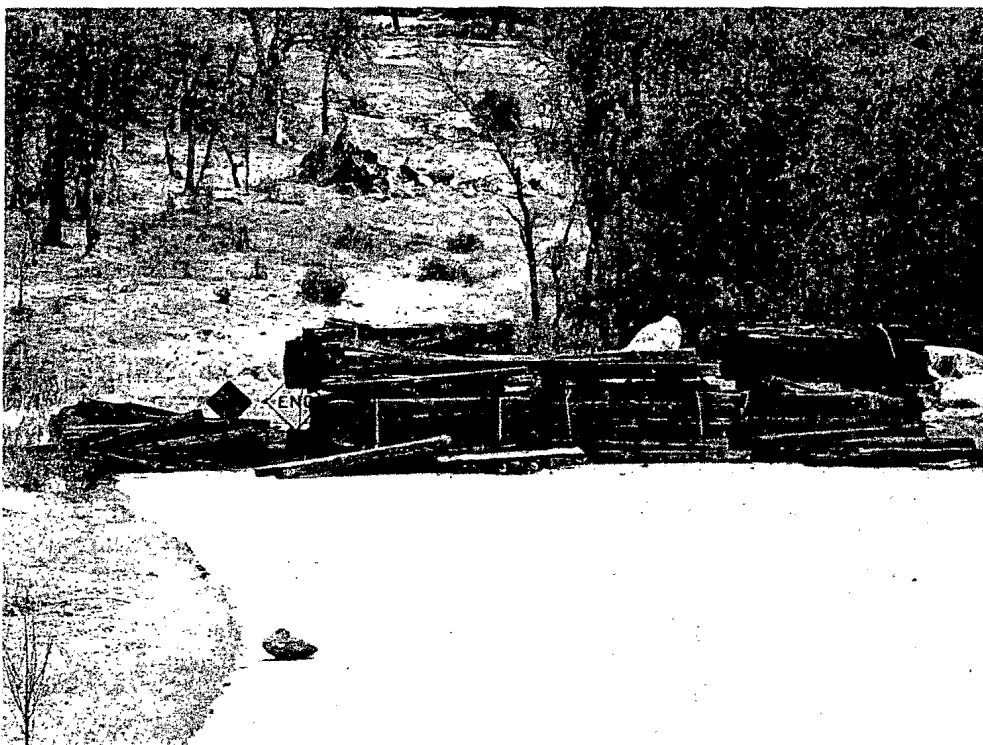


Photo 8: Piled ties at end of Boxcar Blvd.



Photo 9: Piled ties east of Hwy 88 crossing at Hwy 104.



Photo 10: Looking east from Hwy 88 crossing at Hwy 104. Note pile of ties from Photo 9 behind building on left.

