

September 29, 2009

Mr. Thomas McFarland, Atty.
208 South LaSalle St, Suite 1890
Chicago IL 60604-1112

RE: STB Docket No. AB-497 (Sub-No. 5X) – Minnesota Northern Railroad Abandonment of the
Roseau-Warroad Segment from Milepost 83.6 to Milepost 101.61
Roseau County
SHPO Number: 2009-3500

Dear Mr. McFarland:

Thank you for the opportunity to review and comment on the above project. It has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and the Procedures of the Advisory Council on Historic Preservation (36CFR800).

The information submitted does not adequately address the identification and evaluation of historic properties as required by 36CFR800. Specifically, the railroad line itself, as well as individual elements of the line, need to be evaluated to determine whether they meet National Register criteria.

Contact us at (651) 259-3455 with questions or concerns.

Sincerely,



Dennis A. Gimmestad
Government Programs & Compliance Officer

under the ownership of BNSF Railway Company through a series of mergers. The Line was acquired by MNN in 1997.

The GNR was the only privately funded transcontinental railroad in the U.S. refusing federal subsidies for its construction. GNR was financed by Mr. James J. Hill and developed from the existing the St. Paul and Pacific Railroad. The GNR was also the only transcontinental railroad to avoid receivership during the depression of 1893 to 1897. During the early years, the GNR was built slowly. Mr. Hill used early promotional incentives like feed and seed donations to farmers settling along the rail line.

In the summer of 1902 the GNR began to clear a right-of-way for the Line into the area. In 1903, the GNR acquired the land for laying the tracks and work began the following spring. By October of 1904, the tracks were complete and the train came steaming into the area. By 1908, the GNR reached Warroad, MN, and from there went west and south.⁵

At its height, GNR had constructed rail system reaching from the Canadian border to the north and to Chicago, IL to the south and from Superior, WI, in the east to Puget Sound at Everett, WA to the west. By 1970, at the time of its merger with BNSF, GNR had a rail system extending over 8,000 miles in length.

According to MNN, the Line contains four railroad bridges that are 50 years old or older. MNN states that it has no knowledge regarding the exact age of the bridges except that they are believed to be more than 50 years old. MNN also maintains that the four bridges do not meet the criteria for listing on the National Register of Historical Places and that there is no likelihood of archeological resources or any other previously unknown historic properties within the proposed project area. If the abandonment is approved, MNN would salvage the rails, ties and bridges but would leave the ballast and culverts in place.

MNN has submitted the historic report to the Minnesota Historical Society, Historic Preservation Office, (SHPO), pursuant to 49 CFR 1105.8(c).⁶ SEA has not heard from the SHPO and therefore has not been able to consider the SHPO's opinion before determining if the Line may be potentially eligible for listing on the National Register of Historic Places. Accordingly, SEA is recommending a condition requiring the railroad to retain its interest in and take no steps to alter the historic integrity of all potentially historic sites and structures within the project right-of-way (the Area of Potential Effect) until completion of the Section 106 process.

Pursuant to 36 CFR 800.2, SEA conducted a search of the Native American Consultation Database at <http://home.nps.gov/nacd> to identify Federally recognized tribes, which may have

⁵ <http://www.roseaucohistoricalsociety.org>.

⁶ Guidance regarding the Board's historic preservation review process is available on the Board's web site at <http://www.stb.dot.gov/stb/environment/preservation.html>.

Comment
sent
9-29-09

See
attached