



Minnesota
Historical Society

State Historic Preservation Office

November 25, 2009

Ms. Catherine Glidden
Section of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, D.C. 20423-0001

Re: DM & E Railroad Powder River Basin Expansion Project
SHPO Number: 2002-0815PA

Dear Ms. Glidden:

Thank you for submitting the "Phase I Archaeological and Geomorphological Survey for the New Ulm Yard Project, Minnesota Rehabilitation Segment" (Two Pines Resource Group, May 2008), and the "Final Historic District Treatment Plan for the Winona & St. Peter/Dakota Central Railroad Historic District" (HDR Engineering, August 2009). Both of these documents have been prepared pursuant to the Section 106 Agreement for the Dakota, Minnesota & Eastern Railroad's Powder River Basin Expansion Project.

We acknowledge that we have not provided comments to you within the review period proscribed by the agreement. However, inasmuch as we have some comments that may be helpful to you and to the railroad during implementation, we are providing comments at this time.

1. "Phase I Archaeological and Geomorphological Survey for the New Ulm Yard Project, Minnesota Rehabilitation Segment"
 - A. We concur with the determination that site 21BE0284 does not meet National Register criteria.
 - B. We concur with the determination that site 21BO0097 and 21BW0098 merit Phase II evaluation.
2. "Final Historic District Treatment Plan for the Winona & St. Peter/Dakota Central Railroad Historic District"
 - A. We understand that additional information on the treatment of archaeological sites related to the history of the line will be integrated into this plan after such sites have been identified and evaluated.
 - B. As the plan indicates, work on the bridges, engineered grade, and other structures along the line need to be planned with reference to the Secretary of the Interior's Standards. Among the issues to be considered are:
 - *On masonry structures: replacement mortar strength and composition should be determined by the historic material, not by a predetermined standard formula.

*On concrete structures: the gentlest method of cleaning should be used. If the gentlest method is tested and causes any damage, cleaning should probably be avoided.

*On steel structures: efforts should be made to determine effective methods of repair of component parts, before proceeding with replacement. Sometimes these methods are not readily apparent at the onset of a project.

C. We note the incorporation of additional information on treatment approaches for the depot buildings, and that the plan provides for assistance to the depot buildings in Sleepy Eye, Minnesota (as well as the depot building in De Smet, South Dakota). We look forward to consulting about the work that will be accomplished with that assistance, with reference to the Secretary of the Interior's Standards. Among the issues that will need to be considered are:

*Historic windows and wood trim should be retained and repaired whenever possible, and only replaced when necessary.

*Abrasive cleaning must be avoided. Cleaning methods (for graffiti, for example) should be tested before being used on a larger scale. If the gentlest cleaning method damages the material, cleaning should probably be avoided.

D. We note that the maps of the historic district do not appear to include segments of the line that were originally part of this railroad but that are not currently under the management of the DM&E. These segments would likely be considered to be part of the historic property, even though they would not be covered by the treatment plan. Any future work on defining the boundaries of the historic district would need to address this issue.

We look forward to working with you and with the DM&E and other interested parties in implementing the terms of the agreement for this project. Contact us at 651-259-3455 with questions or concerns.

Sincerely,



Britta L. Bloomberg
Deputy State Historic Preservation Officer

cc: Randy Withrow, Loius Berger Group
Herb Jones, DM&E
Joe Trnka, HDR
Dave Christian, New Ulm Heritage Preservation Commission
Joe Barbeau, Winona Heritage Preservation Commission
Mark Peterson, Winona County Historical Society
Mark Leiferman, Waseca Heritage Preservation Commission
Jody Borth, Sleepy Eye Area Historical Society
David Grabitske, Minnesota Historical Society