

BI - 16245

REC'D SEP 19 2008



State Historic Preservation Office

September 15, 2008

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

Re: STB Finance Docket No. 33407, Historic District Treatment Plan
DM&E Railroad Corporation's Powder River Basin Expansion Project
MNSHPO Number: 2002-0815PA

Dear Ms. Glidden:

Thank you for submitting a copy of the proposed Historic District Treatment Plan for the National Register-eligible rail corridor in the Dakota Minnesota and Eastern Railroad Company's project area. This treatment plan has been prepared pursuant to the provisions of the Section 106 Programmatic Agreement for the project.

We appreciated the recent opportunity to meet with you and with representatives of the DM&E, HDR Inc, and Louis Berger Group to discuss various aspects of the plan. Based on our review and on those discussions, we have the following comments:

1. Integration of the treatment of historical archaeological sites related to the district's significance into this treatment plan should be considered. We recognize that there will be other treatment plans for archaeological properties, but it may be appropriate to include all of the historic properties related to the railroading context in a single plan.
2. The treatment plan includes financial assistance for rehabilitation activities for the historic passenger depot in Sleepy Eye, Minnesota, which houses a museum. The plan currently describes the amount of this contribution as "undisclosed"; this is too vague to convey an intended level of effort within the treatment plan. Rather than specifying a dollar amount, we would suggest that the railroad, the building owner, and our office consult to determine the priority needs of the building, and that a rehabilitation project of selected items to be funded under the plan be developed. Responsibility for cost estimating and budgeting should be clear, and the budget should include any needed architectural fees so that the work is planned properly. It may be advisable to complete this step before the historic preservation plan is finalized, so that the level of effort is more clearly understood. All rehabilitation work to be accomplished under this item must be submitted to our office for review and concurrence.
3. The historic depot buildings in Waseca and New Ulm are both owned by the DM&E. To help ensure that modifications and maintenance of these buildings are consistent with the Secretary of the Interior's Rehabilitation Standards, we would suggest that a Historic Structures Report be completed by a qualified architect for both buildings. This report would provide guidance to the railroad about appropriate practices for both properties.
4. We recommend some additional consultation about potential effects to the historic freight depot in Sleepy Eye. This consultation should include the owner of the building, our office, and any other interested parties (perhaps museum staff of the adjacent passenger depot building). Depending on the results of this consultation, some mitigation measures may be needed.
5. The treatment plan includes guidelines for timber, steel (five types), and masonry structures, and for the engineering railroad grade itself. The inclusion of specific guidelines for each of these property types is helpful.

We are currently completing a more detailed review of these guidelines; comments are forthcoming. The plan needs to include a clear set of procedures to outline a level of consultation between the railroad and our office on the specific replacement/rehabilitation plans for each element. Due to the high number of structures, these procedures need to be carefully developed so that they are realistic in terms of available staff review time. The procedures should also include a way to address the possibility of additional removals or radical treatment of crossings or other elements during the detailed engineering of the project.

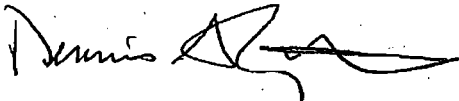
6. Considering the fact that 71% of the crossing structures will experience major loss of historic integrity, recordation of the property to archival standards is important. The general approach to recordation in the plan is appropriate. In addition to utilizing the Secretary of the Interior's Standards for Architectural and Engineering Documentation (HABS/HAER), the documentation prepared for Minnesota should also conform to the Minnesota Historic Properties Record (MHPR), which is the counterpart to HABS/HAER documentation intended to remain at the state level. The standards are consistent; the MHPR guidelines will include some specific direction for numbering and labeling. At this time, digital images are not accepted under the MHPR. The documentation also needs to address the issue of recordation of sections of the overall eligible historic district that may be outside the project area (preferably by including some representative recordation of elements in these sections).

7. The Historic Publication could provide an important perspective on the role of an early rail line on the settlement history of southern Minnesota and the region westward. A good plan for distribution of this publication will be important.

8. To help prevent confusion during the implementation of the plan, the plan should include a clear map of the historic district, showing, at least, the major cities along the line. The map should clearly illustrate those areas where the historic district runs along a line (in place or abandoned) that departs from the current DM&E route. Before finalization of the plan, our office should review and concur with the delineations on this map. The name of the historic district should also be clarified, as it will need to be used in implementation of some of the mitigation strategies. Note that the Figure 1-2 is not entirely accurate.

If you have any questions or concerns about these comments, please contact us at 651-259- 3456. We look forward to working with you on this and other elements related to the Programmatic Agreement.

Sincerely,



Dennis A. Gimmestad
Government Programs & Compliance Officer

cc: Randy Withrow, Louis Berger Group
Herb Jones, DM&E
Doug Jackson, HDR
Joe Trnka, HDR
Dave Christian, New Ulm Heritage Preservation Commission
Joe Barbeau, Winona Heritage Preservation Commission
Mark Peterson, Winona County Historical Society
Mark Lelferman, Waseca Heritage Preservation Commission
Jody Borth, Sleepy Eye Area Historical Society
David Grabitzke, Minnesota Historical Society
Karla Johnson