



April 17, 2014

Troy Brady
Office of Environmental Analysis
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Re: Cedar City Subdivision Abandonment (AB-33 Sub 283x)

Dear Mr. Brady:

On behalf of Union Pacific Railroad Company (UP), this letter requests that your office seek consultation with the Utah State Historic Preservation Officer (SHPO) regarding the proposed abandonment of a segment of the Cedar City Subdivision, per 36 CFR 800.3. UP has made a good-faith effort to identify and evaluate historic properties eligible for listing in the National Register of Historic Places (NRHP), as summarized below.

The abandonment requested is a 1.03-mile segment of railroad in Cedar City, Iron County, Utah. The segment commences at Milepost 30.8 near Airport Road and extends to the end of the line at Milepost 31.83 near N 300 W. The railroad right of way has been inactive for several years. The only structure within the abandonment area is the track structure (rails, ties, and ballast), and there are no bridges within the segment. Because the line is in an urban area, the former roadbed is at the same elevation as the surrounding lands. A map of the Line is included as Attachment 1 and photographs as Attachment 2.

UP recommends that an area of potential effects (APE) be defined as the railroad right of way within the 1.03-mile segment proposed for abandonment. Because the ground within right of way has been previously disturbed, it is recommended that abandonment has no potential to affect archaeological resources. Furthermore, it is not anticipated that abandonment would affect surrounding properties.

Cedar City was originally settled in 1851 by Mormon pioneers from Parowan, who were sent to build an iron works. The site was located between iron deposits 10 miles west and coal deposits 10 miles up Cedar Canyon. In 1855, a new site, closer to the iron works and out of the flood plain of Coal Creek, was established at the present day site of Cedar City. Cedar City was incorporated on February 18, 1868.

Although the iron works closed in 1858, iron ore mining near Cedar City continued on a small scale. Lack of transportation hindered development of industry in Cedar City, and the city's growth was limited through the nineteenth century. The population of Cedar City was just under 1,000 in 1890 and approximately 1,400 in 1900. The Utah Southern Railroad extended its line as far as Milford in 1880, but a through line did not run through southwestern Utah until the Los Angeles and Salt Lake Railroad (LA&SL, originally San Pedro, Los Angeles and Salt Lake) completed its line in 1905. Cedar City, however, did not gain a direct railroad connection until 1923, when the LA&SL (by then controlled by the Union Pacific) built the 32.5-mile Cedar City Branch from its mainline at Lund ("San Pedro, Los Angeles and Salt Lake Railroad," Utahrails.net; <http://utahrails.net/up/splast-last-1901-1936.php>). The Cedar City Branch line served the expanding iron ore mines west of the city. In addition, the railroad connection to Cedar City in 1923 established the area as a tourism gateway to the nearby Bryce Canyon, Zion, and Grand Canyon National Parks.

Tourism was an expanding industry during the 1920s, and the Union Pacific sought to tap its potential through its subsidiary Utah Parks Company. The company built hotels and lodges and conducted auto-stage (bus) tours of the parks from the end of the rail line at Cedar City. The importance of the railroad in the early tourism at national parks in southwestern Utah is summarized aptly in the historical marker at the NRHP-listed Cedar City Railroad Depot:

Built in 1923, the Cedar City Railroad Depot is historically significant for its direct association with the railroad and its impact on Cedar City. In addition to stimulating the local iron ore and livestock industries, the railroad connection to Cedar City greatly contributed to the expansion of the tourism industry in southern Utah. As roads to scenic areas were developed, Cedar City became a strategic center for travel to national parks and monuments... In addition to constructing the depot, the Union Pacific Railroad became fully involved in the tourist industry by purchasing hotels, buses, and building lodges. Tourist travel increased dramatically following completion of the railroad and depot—visitors to Zion National Park increased from 3,692 in 1920 to 55,297 in 1930.

That the Cedar City Railroad Depot is listed in the NRHP is a precedent that the Cedar City Branch line was a significant railroad corridor, as summarized above, for its association with the development of tourism in southern Utah, particularly in Bryce Canyon and Zion National Parks. The historic integrity of the railroad line, however, has been compromised to a degree that it no longer conveys this significance. Although the segment of line proposed for abandonment generally retains aspects of location, materials, and workmanship, the line has lost a critical associative value due to prior abandonment and removal of a segment of the line designed as a loop. When the Cedar City Branch Line was constructed in 1923, it ended in a distinctive loop track serving a passenger depot in the area where tourists transferred from trains to buses destined for UP National Park hotels in Bryce Canyon and Zion National Parks. The connection between railroad and bus service was critical in moving passengers from the end of the

line at Cedar City to the National Parks and, thus, opening up the area to tourism. Without the loop track connecting to the depot, the integrity of the rail line has been greatly diminished in the aspects of design, association, feeling, and setting. Furthermore, there are no other structures, such as bridges or culverts, within this segment.

Due to this loss of historic integrity, UP recommends the segment of railroad line proposed for abandonment is not eligible for listing in the NRHP, and therefore, no historic properties will be affected by the proposed abandonment. UP requests that your office makes a finding of No Historic Properties and seeks concurrence from the Utah State Historic Preservation Officer.

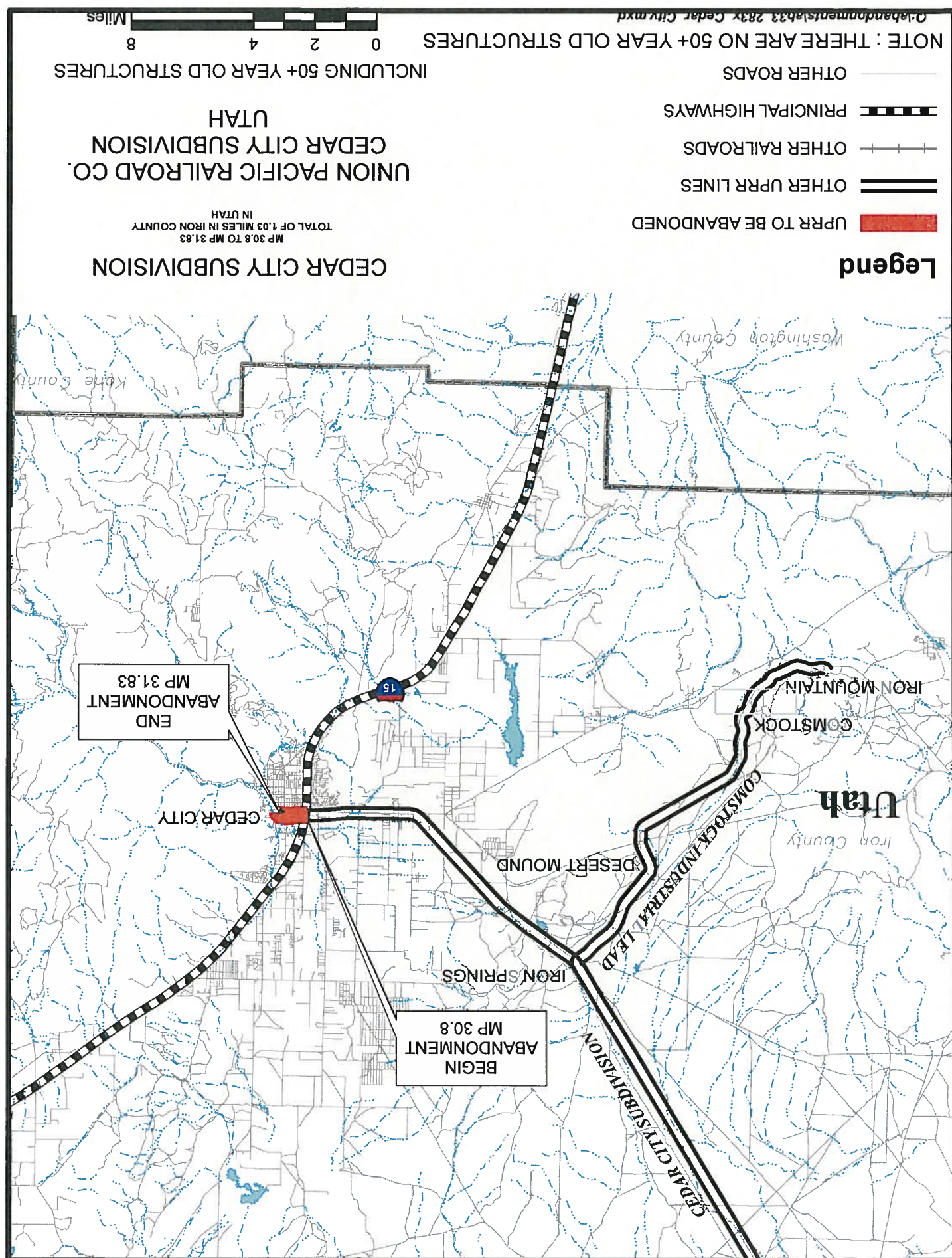
Thank you for your assistance in this matter. If you need further information, please do not hesitate to contact me.

Sincerely,
Summit Environments, Inc.

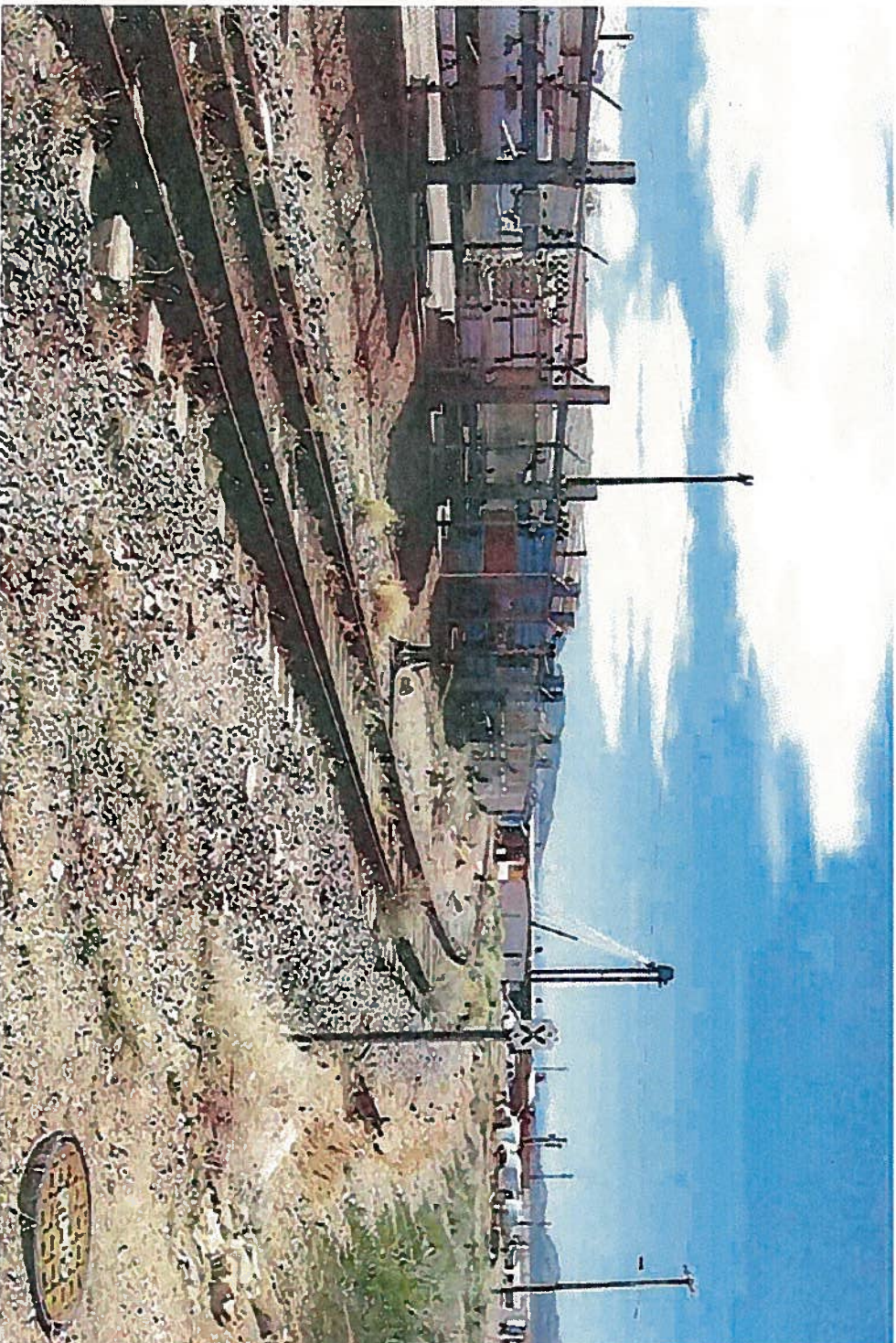


Andrew Schmidt
Director of Cultural Resources

C: Mack Shumate, Union Pacific Railroad Co.
Olin Dirks, Union Pacific Railroad Co.

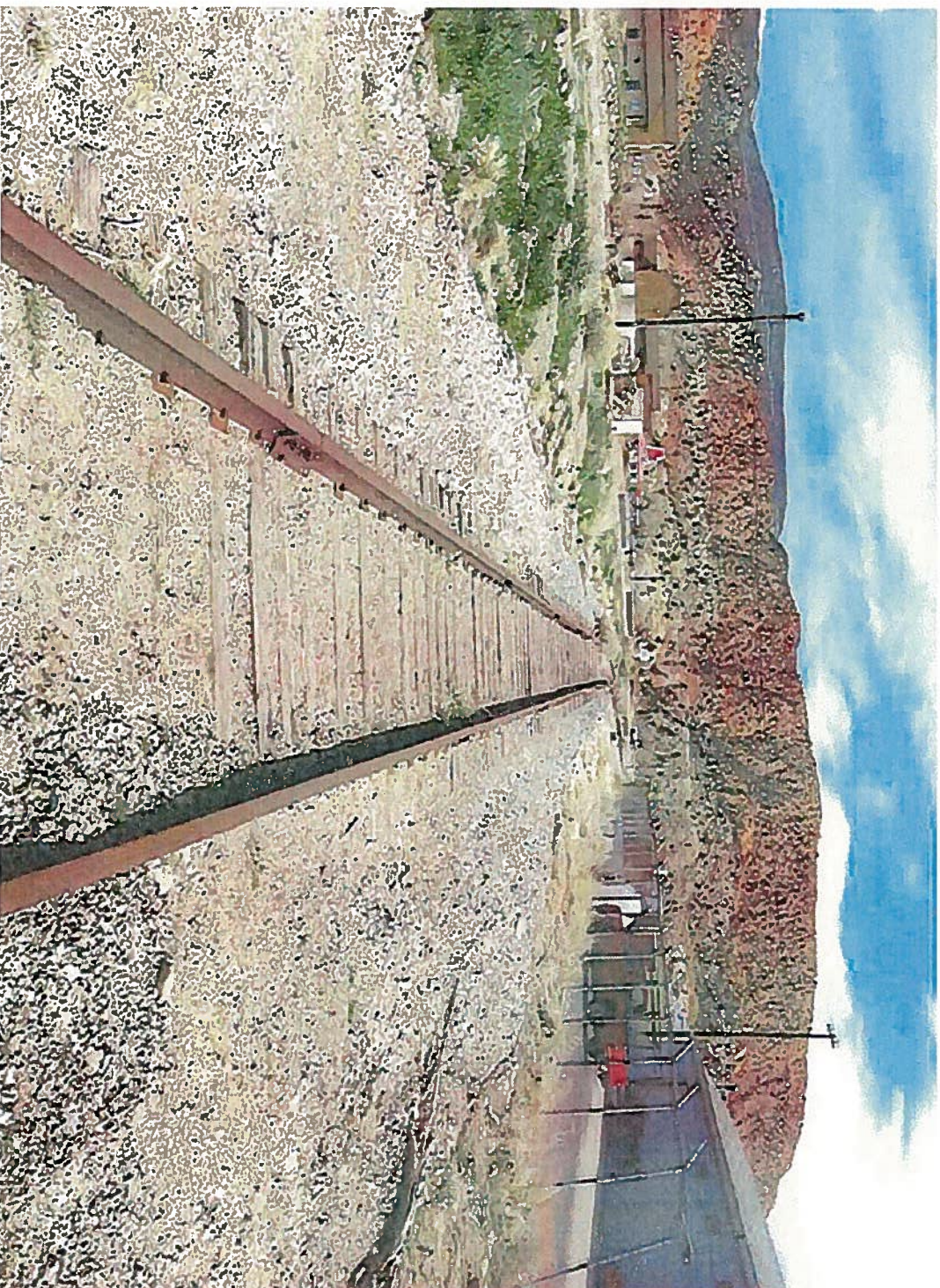


Cedar City Subdivision – 283X



MP 32.1 Looking West

Cedar City Subdivision – 283X



MP 32.0 Looking East

Cedar City Subdivision – 283X



MP 31.9 Looking West

Cedar City Subdivision – 283X



MP 31.7 Looking West

Cedar City Subdivision – 283X



MP 31.4 Looking East

Cedar City Subdivision – 283X



MP 31.3 Looking West