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DHW
AB-1076X

November 8, 2011

Frances McSwain
Deputy State Historic Preservation Officer
The Department of Arkansas Heritage
1500 Tower Building
323 Center Street
Little Rock, AR 72201

Re: AHPP Tracking Number 78985: Section 106 Review—STB Proposed Caddo Valley Railroad Company, Abandonment Projects from MP 429.45 to MP 447, and from MP 447 to MP 479.2

Dear Mrs. McSwain:

This letter on behalf of Caddo Valley Railroad is in response to your letter of November 2, 2011. At the outset, please note that I have previously high-railed the entire length of the track that is to be abandoned on several occasions. As the topographic maps show, the track is located in a sparsely populated portion of Arkansas that is either agricultural or forested. At no point during any of my trips on the line did I ever see any structure adjacent to or within the existing right-of-way that appeared to fit within the definition of a historic property. In large measure, the only structures that were visible from the right-of-way were deer stands that hunters have built in the trees. In any event, the removal of railroad materials from the right-of-way would not impact any historic structure that may be located adjacent to the track.

In further response to your letter, I have consulted with experts with many years of experience in the removal of railroad tracks and track materials. They have advised me that the removal of the track will not have a detrimental impact on the ground within the right-of-way or on adjacent properties. Due to the age of the rail, the removal process is simply a matter of unbolting the rails, pulling the spikes, and lifting up the items to put them onto trucks. The equipment used to dismantle railroad tracks is relatively small in nature, and much of it rides on the existing rails until they are gone. Examples of the other equipment would be forklifts to lift items such as the railroad ties, and small material handling cranes, with magnets, to lift the steel item.

As reflected by the attached letter from CMC Rail, "[o]perating on the crossties, a rail sled sets the rail off beside the ties on the railroad right-of-way. All other track material is set off on the same side by magnet. Crossties are then removed from the ballast section and set out on the opposite side of the road bed. Flatbed haul trucks can then be driven down the road bed, loaded with removed material and hauled off the right of way. Trucks will use public roads to haul to designated owned or leased yards. All removed materials will be recycled."

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Consistent with CVRR's intent to work with interested parties in order to preserve the right-of-way through the Rails-to-Trails program, the railroad ballast will not be removed. As noted in the attached letter, that process "leaves no potential for detrimental impact on ground surfaces."

Caddo Valley Railroad is mindful of the historic preservation laws and procedures and will only work with established companies who have the necessary experience to ensure full compliance with the aforementioned laws and procedures. If you have any questions regarding the removal process, please call me at 202-363-2011. Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "R.H. Streeter", with a stylized flourish at the end.

Richard H. Streeter

RHS:rs
Attachment

cc: James E. Smith, Jr.
Victoria Rutson



November 7, 2011

Mr. Richard H. Streeter
Counsel for Caddo Valley Railroad Company
5255 Partridge Lane, N. W.
Washington, D.C. 20016

Re: Caddo Valley Railroad Company Abandonment – MP429.45-479.2

Mr. Streeter:

This letter is in answer to your questions regarding our company's process for removal of railroad materials from the above referenced Project.

Operating on the crossties, a rail sled sets the rail off beside the ties on the railroad right-of way. All other track material is set off on the same side by magnet. Crossties are then removed from the ballast section and set out on the opposite side of the road bed. Flat bed haul trucks can then be driven down the road bed, loaded with removed material and hauled off the right of way. Trucks will use public roads to haul to designated owned or leased yards. All removed materials will be recycled.

The railroad ballast will not be removed, which leaves no potential for detrimental impact on ground surfaces. Additionally, due to all work being conducted only on the railroad right of way, no ancillary or adjacent properties will be disturbed.

Please let me know if you need any additional information.

Cordially,

Gary L. Kerley
CMC Rail