



TENNESSEE HISTORICAL COMMISSION

2941 LEBANON PIKE
NASHVILLE, TENNESSEE 37243-0442
OFFICE: (615) 532-1550
www.tnhistoricalcommission.org

October 14, 2020

Ms. Victoria Rutson
Surface Transportation Board
Office of Environmental Analysis
395 E Street SW
Washington, DC 20423

RE: STB / Surface Transportation Board, Construction and Operation of 12.17 miles of Common Carrier Rail Line, Fulton Co. Kentucky to Union City, TN, Obion County, TN

Dear Ms. Rutson:

In response to your request, we have reviewed the documents you submitted regarding your proposed undertaking. Our review of and comment on your proposed undertaking are among the requirements of Section 106 of the National Historic Preservation Act. This Act requires federal agencies or applicants for federal assistance to consult with the appropriate State Historic Preservation Office before they carry out their proposed undertakings.

We concur that the proposed Area of Potential Effects (APE) of 500 ft on either side on the proposed rail line is appropriate for assessing visual effects. You must also assess the undertaking for potential auditory effects. Your letter states the APE for the architectural survey will be a 500 ft. buffer on either side of the proposed line, however, the Cultural Resources Analysts (CRA) letter states their desktop survey area was 300 ft. Please ensure the architectural survey's APE matches the 500 ft. as stated in your letter.

We further concur that 300 ft. on either side of the line is an appropriate APE for archaeological resources. We do not concur with limiting the archaeological survey to the areas deemed high potential by CRA. We request that the entire APE be surveyed for archaeological resources.

Upon receipt of the survey report, we will continue our review of this undertaking as expeditiously as possible. Until such time as this office has rendered a final comment on this project, your Section 106 obligation under federal law has not been met. Please inform this office if this project is canceled or not funded, licensed, or permitted by the federal agency. Questions and comments may be directed to Jennifer M. Barnett ((615) 687-4780, Jennifer.Barnett@tn.gov).

Your cooperation is appreciated.

Sincerely,

E. Patrick McIntyre, Jr.
Executive Director and
State Historic Preservation Officer

EPM/jmb