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CRAIG A. POTTS
EXECUTIVE DIRECTOR &
STATE HISTORIC
PRESERVATION OFFICER

November 9, 2020

Victoria Rutson, Director
Office of Environmental Analysis
Surface Transportation Board
Washington, DC 20423

Re: Section 106 Evaluation and Review - *Docket No. FD 36328, Ken Tenn Regional Rail Partners, Inc. Request for APE Concurrence and Field Survey Plans*
by Trent Spurlock and Charles M. Niquette, CRA, October 2020
Obion County, TN, and Fulton County, KY

Dear Victoria Rutson:

Thank you for submitting a digital copy of the above- and below-ground cultural resource records reviews to my office on October 14, 2020. These documents were submitted for proposed Area of Potential Effect (APE) and field survey methods approval. We understand that the applicant has proposed to construct and operate 12.17 miles of new rail line between the Hickman-Fulton County River Port and Union City, Tennessee. Out of seven alternatives, two routes – Alternative 1 and 7 – have progressed to the analysis phase.

For above-ground resources, CRA proposes a 500-foot buffer on either side of the center line to evaluate direct or indirect effects. During records review, CRA identified nine resources within the study area. Of these resources, FU-4, FU44/FU-39, and FUH-2/FUH-7 were identified as demolished. Three additional resources, FU-38, FU-40, and FUH-79, appear incorrectly mapped or not in/adjacent to the study area. The remaining resources, FU-3, FU-9, and FU-47, will be evaluated during field survey work, in addition to newly identified properties, if applicable.

For below-ground resources, CRA proposes a 300-foot wide corridor around the proposed railroad routes covering approximately 417.83-acres. During records review, CRA identified one recorded archaeological site (15Fu6) within the Alternative 7 corridor. The existence of Site 15Fu6, structures depicted on historic maps, the undeveloped nature of portions of the proposed corridors, and the identification of soil series with possible deeply buried cultural deposits suggest the potential for identification of significant below-ground resources within the proposed APE. To ensure the identification of all below-ground resources that could be impacted by this project, our office recommends the entire proposed APE be subject to a Phase I archaeological survey as guided by the KHC/SHPO *Specifications for Conducting Fieldwork and Preparing Cultural Resource Assessment Reports*.

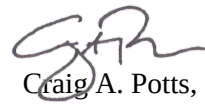


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Our office is satisfied by the proposed APE and field survey methods for the identification of above-ground resources as well as the proposed APE (i.e., 300-foot wide corridor) for the identification of below-ground resources for this undertaking. We look forward to additional consultation on this undertaking, including the review of and comment on resulting survey reports.

Should you have any questions, please contact Gabrielle Fernandez and Vanessa Hanvey of my staff at Gabrielle.Fernandez@ky.gov and Vanessa.Hanvey@ky.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read 'C. Potts', is positioned above the printed name.

Craig A. Potts,
Executive Director and
State Historic Preservation Officer

CP: GF, VH; KHC # 59963, 59981, 57096