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CRAIG A. POTTS
EXECUTIVE DIRECTOR &
STATE HISTORIC
PRESERVATION OFFICER

November 19, 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 modifications to area of potential effects and field survey methods for archaeological resources.*
Original proposals 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 summary of proposed modifications to the Area of Potential Effect (APE) and below-ground field survey methods to my office on November 10, 2020. The originally proposed APE and field survey methods for above- and below-ground resources were reviewed by this office on November 9, 2020. We understand that no modifications are being suggested for the above-ground portions of this project.

Proposed modifications associated with the APE and field survey methods for archaeological or below-ground resources include limiting the APE to the construction limit of disturbance and staging areas, utilizing pedestrian survey along abandoned and/or previously disturbed railroad right-of-way, and utilizing pedestrian survey when surface visibility is greater than 50 percent, which may include in recently harvested agricultural fields.

My office agrees that these modifications are consistent with the standards for determining an APE as well as field survey methods outlined in the KHC/SHPO *Specifications for Conducting Fieldwork and Preparing Cultural Resource Assessment Reports* (revised 2017). Please be aware that if an agricultural field is subject to limited ground disturbing activity as part of the planting process but surface visibility is greater than 50 percent, then shovel test excavation may be necessary to adequately assess the presence of below-ground resources. 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,

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

CP: GF, VH; KHC # 59984, 59963, 59981, 57096
cc: Alan Tabachnick (OEA), Diana Wood (OEA)



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