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June 25, 2014

VIA ELECTRONIC FILING

Ms. Diana F. Wood
Office of Environmental Analysis
Surface Transportation Board
395 E Street, S.W., Room 1110
Washington, DC 20423-0001

Re: **Docket No. AB-414 (Sub-No. 8X)**
Iowa Interstate Railroad, Ltd. -- Abandonment
Exemption -- In Polk, Jasper and Marion Counties, IA

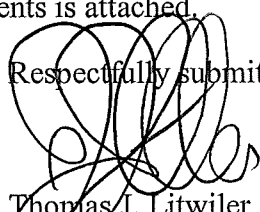
Dear Ms. Wood:

On May 2, 2014, Iowa Interstate Railroad, Ltd. ("IAIS") filed a petition for exemption in the above-captioned proceeding to abandon a 10.75-mile rail line in central Iowa known as the Prairie City Segment. In e-mail correspondence dated May 8, 2014, the State Historical Society of Iowa, acting as the state historic preservation officer ("SHPO"), indicated that the Prairie City Segment and the single bridge on that line do not meet the eligibility criteria for listing on the National Register of Historic Places.

The SHPO also encouraged an archaeological site background check through the Office of the State Archaeologist at the University of Iowa. While IAIS does not believe, given the nature of planned salvage activities and the prior disturbance of the right-of-way when the line was constructed, that such an undertaking is necessary or warranted, IAIS has initiated the requested process under cover of the attached letter.

A copy of the SHPO's comments is attached.

Respectfully submitted,



Thomas J. Litwiler
Attorney for Iowa Interstate Railroad, Ltd.

TJL:tl

Attachments

cc: Mr. Douglas W. Jones, State Historical Society of Iowa

Thomas J. Litwiler

From: Jones, Doug [DCA] <Doug.Jones@iowa.gov>
Sent: Thursday, May 08, 2014 12:58 PM
To: Thomas J. Litwiler
Cc: Gourley, Kathy [DCA]; Christian, Ralph [DCA]; King, Steve [DCA];
Diana.Wood@stb.dot.gov; Jones, Doug [DCA]
Subject: RE: 140300044 Iowa Interstate Railroad, LTD. STB Docket NO. AB-414 (SUB 8X)
Abandonment of line between MP 145.75 to 135

May 8, 2014

Mr. Litwiler,

We have received and reviewed the additional information that you provided to our office recently regarding the above referenced undertaking. We understand that this project will be a federal undertaking for the Surface Transportation Board (STB) and will need to comply with Section 106 of the National Historic Preservation Act and the National Environmental Policy Act. We make the following comments and recommendations based on our examination of this material and in accordance with Section 106 of the National Historic Preservation Act of 1966 and its implementing regulations, 36 CFR Part 800 (revised, effective August 5, 2004); the Advisory Council on Historic Preservation's Policy Statement on Affordable Housing and Historic Preservation (adopted November 9, 2006); and on The Advisory Council on Historic Preservation recently issued guidance in November 2011 on *Meeting the "Reasonable and Good Faith" Identification Standard in Section 106 Review*.

Based on your information, it is our opinion that this section of track and the bridge do not meet any of the eligibility criteria for listing on the National Register of Historic Places. We note that an archaeological site background check was not included with your documentation. We have no comments at this time whether there appears to be any potential that the undertaking will encounter or adversely impact archaeological properties that may be eligible for listing in the National Register of Historic Places as no information was provided in your documentation. We would like to refer you and the STB to the Advisory Council on Historic Preservation's recently issued guidance in November 2011 on *Meeting the "Reasonable and Good Faith" Identification Standard in Section 106 Review* for guidance on what types of information should be included in the documentation provided for consultation under Section 106 of the National Historic Preservation Act. We would encourage you to contact the Office of the State Archaeologist at the University of Iowa to get an archaeological site background check conducted for your undertaking. We look forward to consulting with the federal agency when they provide us with a determination of effect to our office and all other potential consulting parties for consultation under Section 106 of the National Historic Preservation Act.

Please reference the Review and Compliance Number provided above in all future submitted correspondence to our office for this project. We look forward to further consulting with you and the Surface Transportation Board on this project.

We have provided this **technical assistance** according to our responsibility defined by Federal law. It remains the **Federal agency's decision** on how you will proceed from this point for this project.

Douglas W. Jones, Archaeologist and
Review and Compliance Program Manager

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June 25, 2014

VIA ELECTRONIC AND U.S. MAIL

Ms. Colleen Eck
Site Records Manager
Office of the State Archaeologist
University of Iowa
700 Clinton Street Building
Iowa City, IA 52242-1030

Re: **Docket No. AB-414 (Sub-No. 8X)**
Iowa Interstate Railroad, Ltd. -- Abandonment
Exemption -- In Polk, Jasper and Marion Counties, IA

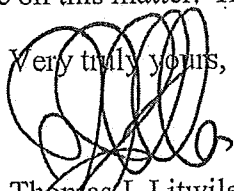
Dear Ms. Eck:

Enclosed please find a Request for Iowa Site File Search regarding an Iowa Interstate Railroad, Ltd. (formerly Chicago, Rock Island & Pacific) railroad right-of-way extending from just west of Center Avenue S/NE 116th Street (County Road S27), south of Mitchellville, Polk County, Iowa, to a point northwest of the intersections of Highways 163 and F62 W, southeast of Prairie City, Jasper County, Iowa.

The railroad is unaware of any previously recorded resources within the railroad right-of-way (the area of potential effect). As shown on the second enclosure, the railroad does not intend any excavation or digging as part of this abandonment and will simply remove the rails and leave the underlying roadbed in place.

Thank you for your assistance on this matter. Kind regards.

Very truly yours,


Thomas J. Litwiler
Attorney for Iowa Interstate Railroad, Ltd.

TJL:tl

Enclosures

cc: Mr. Douglas W. Jones, State Historical Society of Iowa