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April 13, 2010

BY HAND DELIVERY

Ms. Victoria Rutson
Director, Section of Environmental Analysis
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

RE: *Escanaba & Lake Superior Railroad Company – Abandonment Petition for
Exemption – Line in Ontonagon and Houghton Counties, MI, STB Docket No.
AB-415 (Sub-No. 2X)*

Dear Ms. Rutson:

On April 9, 2010, Escanaba & Lake Superior Railroad Company (“ELS”) filed with the Board its petition for exemption in the above-referenced proceeding to abandon a 42.93-mile railroad line located in Ontonagon and Houghton Counties, MI, running from milepost 408.02¹ at Ontonagon to milepost 365.09 at Sidnaw (the “Line”). Prior to that, on March 4th of this year, we supplied you with a copy of the railroad’s consolidated Environmental and Historic Report (“E&HR”), which we also had circulated to the relevant consulting agencies.

When we supplied you with the E&HR, we noted in the cover letter that the Board’s Historic Report regulations require that abandonment petitioners such as ELS supply photographic documentation of all structures located along the Line that are 50 years old or older. We acknowledged, however, that we had not yet been able to satisfy the photographic records component of the report, due to then-existing weather challenges. We conferred with you in advance regarding this matter, and gained an understanding that you would accept our E&HR, provided, however, that ELS later supplemented its historic structures documentation as soon as weather and ground conditions permitted.

¹ Certain materials circulated prior to the abandonment petition overstated the scope of the abandonment, due to a typographical error in which the end of the line at Ontonagon was listed as being located at” milepost 408.2.” The actual end of the line is at milepost 408.02 – there is no milepost 408.2 on the ELS system. The abandonment petition also addresses this typographical error.

BAKER & MILLER PLLC

Ms. Victoria Rutson

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In response to the E&HR that we supplied to the consulting agencies in March, we have received a response from the Michigan State Historic Preservation Office – Environmental Review Office (“SHPO”). In its response, the SHPO directed ELS to prepare and submit an “Application for Section 106 Review” (the “Application”) in a specifically-prescribed format. We have completed that Application, and have appended thereto the photographic documentation (actual photographs) that the SHPO has requested (and that are also required under the Board’s own Historic Report regulations). A copy of the Application and the supplemental materials (including copies of the photographs) are attached. It is our understanding that the attached materials along with our March 4th submission to you and to the various consulting agencies satisfy ELS’s basic requirements for preparing and submitting a consolidated E&HR.

Naturally, if we should receive additional feedback from any of the consulting agencies, we will bring that feedback to your attention promptly.

If you have any questions concerning the proposed abandonment and/or E&HR, including the materials included with this letter, please contact me at (202) 663-7824.

Sincerely,



Robert A. Wimbish

Counsel for Escanaba & Lake Superior
Railroad Company

Enclosures

cc: Robert Bach, Tom Klimek

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April 13, 2010

Brian D. Conway
State Historic Preservation Office – Environmental Review Office
Michigan Historical Center
702 W. Kalamazoo Street
P.O. Box 30740
Lansing, MI 48909-8240

RE: *Escanaba & Lake Superior Railroad Company – Abandonment Petition for
Exemption – Line in Ontonagon and Houghton Counties, MI*, STB Docket No.
AB-415 (Sub-No. 2X)

Dear Mr. Conway:

I am writing in connection with the above-referenced rail line abandonment proceeding before the U.S. Surface Transportation Board (“STB”), in which my client, Escanaba & Lake Superior Railroad Company (“ELS”), has requested authority to abandon a 42.93-mile rail line (the “Line”) located in Ontonagon and Houghton Counties, MI, running from milepost 408.02 at Ontonagon to milepost 365.09 at Sidnaw. Specifically, I am enclosing an “Application for Section 106 Review” (the “Application”), along with supplemental materials related thereto, pursuant to your request.

As background, on March 4, 2010, in connection with this anticipated STB proceeding, we supplied your agency with a copy of a consolidated Environmental and Historic Report (“E&HR”) describing the proposed abandonment and any expected environmental and historic effects, as well as a map of the affected area. At that time, we acknowledged in the E&HR that we would have to supplement the original report to provide additional documentation regarding structures on the Line that are 50 years old or older. In response to the E&HR (prepared for STB purposes), your office has directed us to prepare and submit the attached Application. Appended to that Application are photographs of the various structures along the Line that are 50 years old or older, and that may or may not be of interest to your agency. Note that the photographs and related descriptions are supplied in accordance with your Application guidelines, and that they are also required under the STB’s regulations for a Historic Report.

Brian D. Conway
April 13, 2010
Page Two

I do not believe that you will conclude that any of the affected structures are of interest to your agency, or that they have intrinsic historical value. In fact, the vast majority of the structures in question are rather nondescript culverts that ELS has no plans to salvage or dispose of anyway. ELS acquired the Line in 1980, and it has very little (if anything) in the way of records that would offer detail on the history of these structures. To the extent that ELS has any such information, I have attempted to include it with the Application and in the E&HR. If, however, a structure detailed in the attached materials becomes of interest to your agency, and you would be interested in any additional information regarding such a structure, please let me know. ELS and I will cooperate with you as best we can to complete your review.

I will be supplying a copy of this letter, the Application and supplemental attachments to the STB's Section of Environmental Analysis ("SEA"), which I believe has begun or will soon begin the preparation of an environmental assessment ("EA") in connection with the proposed abandonment. We would appreciate it if you would confer with the SEA at the following address, as your feedback will bear on the EA that ultimately will be produced: 395 E Street, SW, Washington, DC 20423-0001; TEL: (202) 245-0295, and refer to STB Docket No. AB-415 (Sub-No. 2X).

Finally, to afford you a more complete record, I am supplying you with a copy of the abandonment petition, which we filed on behalf of ELS on April 9, 2010.

If there are any questions concerning the attached Application or any of the other materials included with this letter, please contact me at the law firm of Baker & Miller, PLLC, 2401 Pennsylvania Avenue, NW, Suite 300, Washington, DC 20037; by facsimile at (202) 663-7849; by e-mail at rwimbish@bakerandmilller.com, or by telephone at (202) 663-7824.

Sincerely,



Robert A. Wimbish
Counsel for Escanaba & Lake Superior
Railroad Company

Enclosures

cc: Section of Environmental Analysis - Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Robert Bach

Tom Klimek

STATE HISTORIC PRESERVATION OFFICE
Application for Section 106 Review

SHPO Use Only

☐ IN	Received Date ____ / ____ / ____	Log In Date ____ / ____ / ____
☐ OUT	Response Date ____ / ____ / ____	Log Out Date ____ / ____ / ____
	Sent Date ____ / ____ / ____	

Submit one copy for each project for which review is requested. This application is required. Please type. Applications must be complete for review to begin. Incomplete applications will be sent back to the applicant without comment. Send only the information and attachments requested on this application. Materials submitted for review cannot be returned. Due to limited resources we are unable to accept this application electronically.

I. GENERAL INFORMATION

☒ THIS IS A NEW SUBMITTAL ☐ THIS IS MORE INFORMATION RELATING TO ER#

- a. Project Name: Escanaba & Lake Superior Railroad Company -- Abandonment Exemption -- Line in Ontonagon and Houghton Counties, MI
- b. Project Address (if available):
- c. Municipal Unit: County: Ontonagon and Houghton Counties, MI
- d. Federal Agency, Contact Name and Mailing Address (*If you do not know the federal agency involved in your project please contact the party requiring you to apply for Section 106 review, not the SHPO, for this information.*): Surface Transportation Board, 395 E Street, SW, Washington, DC 20423-0001
- e. State Agency (if applicable), Contact Name and Mailing Address:
Brian D. Conway, State Historic Preservation Officer, Department of History, Arts, and Libraries, 702 W. Kalamazoo St., PO Box 30740, Lansing, MI 48909-8240
- f. Consultant or Applicant Contact Information (if applicable) *including mailing address*: Robert A. Wimbish, Baker & Miller PLLC, 2401 Pennsylvania Ave., Ste. 300, Washington, DC 20037

II. GROUND DISTURBING ACTIVITY (INCLUDING EXCAVATION, GRADING, TREE REMOVALS, UTILITY INSTALLATION, ETC.)

DOES THIS PROJECT INVOLVE GROUND-DISTURBING ACTIVITY? ☐ YES ☒ NO (If no, proceed to section III.)

Exact project location must be submitted on a USGS Quad map (portions, photocopies of portions, and electronic USGS maps are acceptable as long as the location is clearly marked).

- a. USGS Quad Map Name:
- b. Township: Range: Section:
- c. Description of width, length and depth of proposed ground disturbing activity:
- d. Previous land use and disturbances:
- e. Current land use and conditions:
- f. Does the landowner know of any archaeological resources found on the property? ☐ YES ☐ NO
Please describe:

III. PROJECT WORK DESCRIPTION AND AREA OF POTENTIAL EFFECTS (APE)
Note: Every project has an APE.

- a. Provide a detailed written description of the project (plans, specifications, Environmental Impact Statements (EIS), Environmental Assessments (EA), etc. **cannot** be substituted for the written description): Escanaba & Lake Superior Railroad Company ("E&LS") proposes to abandon a 42.93-mile rail line (the "Line") in Ontonagon and Houghton Counties, MI, extending between milepost 365.09 at Sidnaw, and milepost 408.02 at Ontonagon. Following the effective date of a decision from the Surface Transportation Board ("STB") permitting abandonment, E&LS plans to remove the Line's rail and salvageable track material (such as tie plates, fasteners, crossties, and, possibly, the upper layer of ballast). ELS, however, does not intend to disturb any sub grade or sub grade structures, and therefore will not engage in any excavation activity.

Abandonment and the resultant salvage of the line of the Line will eliminate 52 at-grade rail-highway crossings – 14 private crossings, and 38 public crossings. No Bridge structures or culverts will be disturbed along the Line, as E&LS has no plans to dispose of bridges or culverts.

- b. Provide a localized map indicating the location of the project; road names must be included and legible.
- c. On the above-mentioned map, identify the APE.
- d. Provide a written description of the APE (physical, visual, auditory, and sociocultural), the steps taken to identify the APE, and the justification for the boundaries chosen. E&LS has included with this application a map of the Line proposed for abandonment, which identifies all structures along the Line (bridges, culverts, and a railroad depot). The APE has been described and assessed in connection with a consolidated Environmental and Historic Report ("E&HR") that E&LS previously supplied to this agency (and has filed with the STB), and in the abandonment petition for exemption filed with the STB on April 9, 2010 (a copy of which is attached hereto). The metes and bounds of the project are fairly well defined, insofar as this project would entail the abandonment and salvage of rail property within a generally 100-foot-wide right-of-way extending for 42.93 miles. For the purposes of Section 106 review, E&LS is including herewith (as a supplement to its original E&HR) a map depicting the location of all structures along the Line that are believed to be 50 years old or older, photographs of each such structure, and, to the extent available to E&LS, information bearing on each of the structures. E&LS has chosen the subject project boundaries, because they correspond with the scope of the proposed rail line abandonment, which has become necessary due to the precipitous decline in on-Line traffic. As additional background information, over the past several years, E&LS has reduced service frequency over the Line in response to declining demand for service. In 2005, E&LS operated over the Line on a five-times-per-week basis. By January of 2009, however, traffic levels had dwindled to a point where E&LS could justify operating over the Line on a thrice weekly basis only, and, by April of 2009, traffic levels had further declined so that, for the balance of the year, E&LS reduced service levels on the Line to an average of 1.5 trains per week. The Line has no overhead traffic. The limited remaining traffic consists entirely of pulpwood that is trucked to sidings along the Line for transfer to rail cars. E&LS projects that in 2010, depending upon rail car availability and seasonal impacts on pulpwood harvesting, the Line will handle a total of 228 carloads of traffic – all pulpwood. E&LS is arranging to expand its facilities at Sidnaw, MI, to permit the truck-to-rail pulpwood transloading that now takes place along the Line to be relocated to Sidnaw. The only alternative to abandonment would be for E&LS not to abandon the Line, and to continue to incur losses associated with the ownership of an essentially moribund rail asset with remote, if any, prospect for the return of enough traffic to justify continued operations. In light of the exceedingly limited amount of traffic, and the financial drain that ownership of a money-losing asset imposes on the railroad, E&LS sees no choice but to proceed with the subject abandonment petition for exemption. There is no passenger traffic on the line. In 2009, 248 carloads (all pulpwood) moved on the Line. In connection with the proposed abandonment, E&LS will expand pulpwood loading capabilities for customers at Sidnaw (MP 362.66), so that pulpwood shippers will continue to have access to rail service via E&LS. E&LS projects a total of 228 carloads on the Line in calendar year 2010. If all 228 carloads of projected 2010 traffic were diverted to truck, the volume impact would be less than 2 trucks per day on state and local roads. Accordingly, the proposed abandonment should have no adverse effects on regional or local transportation systems and patterns. The elimination of at-grade crossings, which would result from the proposed abandonment, should improve local roadway traffic conditions.

IV. IDENTIFICATION OF HISTORIC PROPERTIES

- a. List and date **all** properties 50 years of age or older located in the APE. If the property is located within a National Register eligible, listed or local district it is only necessary to identify the district: According to the limited information in E&LS's possession, the bridges and culverts along the Line are believed to have been built between the 1890s and 1960. Some of these structures, such as the large bridge crossings of the Ontonagon River near the community of Ontonagon, have been improved over time. Specific dates of construction are unknown for all structures with the exception of the Ontonagon depot which was originally constructed in 1898. For a specific list of all structures see Attachment A.
 - b. Describe the steps taken to identify whether or not any **historic** properties exist in the APE and include the level of effort made to carry out such steps: Based on our internal review, the bridges, culverts and depot are greater than 50 years of age; however, E&LS does not intend on removing any of those structures. E&LS does not believe that any of the structures in question are of historical significance. E&LS acquired the subject Line in 1980, and, at the time, received little information from the prior owner that would provide a historical record of the structures in question. Moreover, E&LS believes that very few, if any, of the structures along the Line would be of interest to this agency. However, if there are questions regarding specific structures, E&LS will do its best to address further questions concerning those structures, and thereby resolve any specific concerns or interests. As indicated previously, however, E&LS has no plans to salvage or otherwise dismantle any of the culverts, bridges, or the depot located along the Line.
 - c. Based on the information contained in "b", please choose one:
☐ Historic Properties Present in the APE
☒ No Historic Properties Present in the APE
 - d. Describe the condition, previous disturbance to, and history of any historic properties located in the APE: The bridges and culverts are currently in operable condition for rail service. The E&LS depot in Ontonagon is in poor condition, but is in use.
-

V. PHOTOGRAPHS

Note: All photographs must be keyed to a localized map.

- a. Provide photographs of the site itself.
 - b. Provide photographs of all properties 50 years of age or older located in the APE (faxed or photocopied photographs are not acceptable).
-

VI. DETERMINATION OF EFFECT

- ☐ No historic properties affected based on [36 CFR § 800.4(d)(1)], please provide the basis for this determination.
- ☒ No Adverse Effect [36 CFR § 800.5(b)] on historic properties, explain why the criteria of adverse effect, 36 CFR Part 800.5(a)(1), were found not applicable.
- ☐ Adverse Effect [36 CFR § 800.5(d)(2)] on historic properties, explain why the criteria of adverse effect, [36 CFR Part 800.5(a)(1)], were found applicable.

Please print and mail completed form and required information to:

***State Historic Preservation Office, Environmental Review Office, Michigan Historical Center, 702
W. Kalamazoo Street, P.O. Box 30740, Lansing, MI 48909-8240***

Attachment A to Application for Section 106 Review

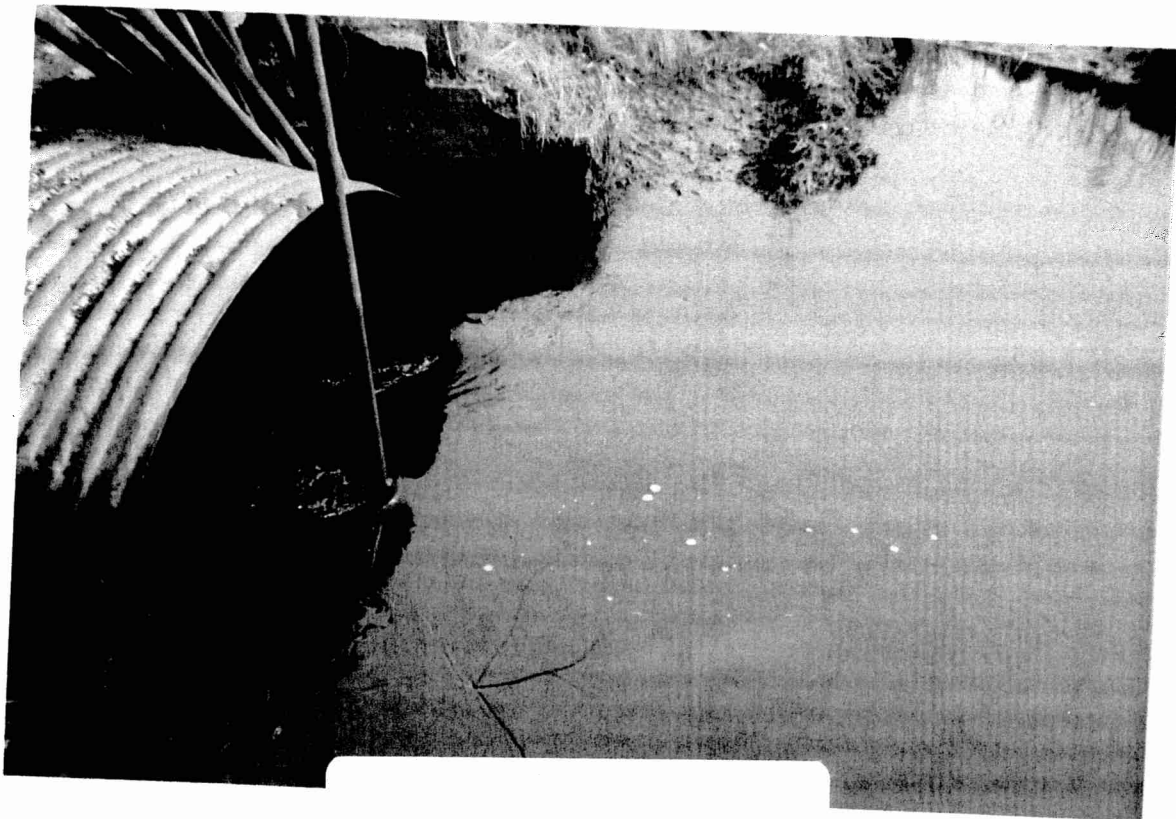
Corresponding Location on Water Crossing Map	<u>MP</u>	Creek/ River Name	Culvert / Bridge Number as indicated on Water Crossing Map
1.	MP363	SidnawCreek	U703
2.	MP365	Sidnaw Creek	U707
3.	MP371	Connors Creek	U715
4.	MP374.5	Buritts Creek	U652
5.	MP374.8	Buritts Creek	U725
6.	MP376.0	Newholm Creek Trestle (Bridge)	U654
7.	MP376.8	Newholm Creek	U731
8.	MP377	Newholm Creek	U735
9.	MP377.9	Newholm Creek	U737
10.	MP378.5	Newholm Creek	U739
11.	MP379.0	Newholm Creek	U741
12.	MP379.5	Leveque Creek	U658
13.	MP381.3	Pori Creek	U662
14.	MP382.5	Jug Creek	U664
15.	MP383.3	Hubbull Creek	U751
16.	MP384.7	Dishinaw Creek	U763
17.	MP385.0	Dishinaw Creek	U767
18.	MP386.1	Adventure Creek	U771.5
19.	MP386.9	Adventure Creek	U775
20.	MP387.5	Adventure Creek	U778.5

21.	MP387.9	Adventure Creek	U778.5
22.	MP388.0	Adventure Creek	U670
23.	MP388.4	Adventure Creek	U781
24.	MP388.5	Adventure Creek	U781.5
25.	MP388.6	Adventure Creek Trestle (Bridge)	U672
26.	MP388.8	Adventure Creek	U797
27.	MP388.8	Adventure Creek	U799
28.	MP389	Adventure Creek	U785
29.	MP391.1	Deer Lick Creek	U807
30.	MP391.2	Deer Lick Creek	U808
31.	MP391.3	Deer Lick Creek	U811
32.	MP394.0	Ontonagon River	U821
33.	MP394.1	Ontonagon River	U823
34.	MP394.6	Ontonagon River	U827
35.	MP395.0	Ontonagon River	U795
36.	MP395.3	Ontonagon River	U676
37.	MP395.9	Ontonagon River	U680
38.	MP396.0	Ontonagon River	U682
39.	MP396.5	Ontonagon River	U833
40.	MP397.8	Verrier Creek	U845
41.	MP401.0	Austin Creek	U858
42.	MP403.5	Paddys Creek	U873
43.	MP403.7	Paddys Creek	U878
44.	MP404.1	Paddys Creek	U879

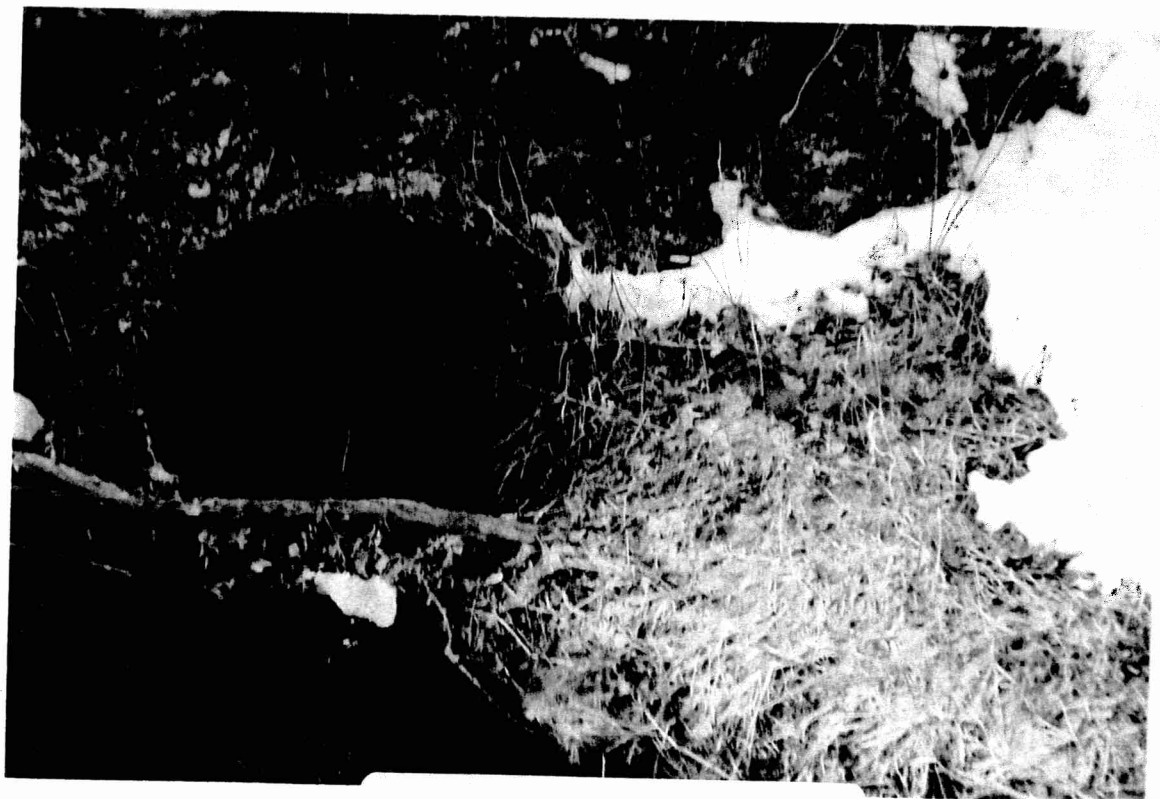
45.	MP404.6	Paddys Creek	U885
46.	MP407.0	Ontonagon River	U885
46a.	MP407.5	Ontonagon Depot	
47.	MP407.8	Ontonagon River	U696
48.	MP407.9	Ontonagon River Trestle (Steel Span) (Bridge)	U1800A
49.	MP407.95	Ontonagon River Pile Trestle 1 span (Bridge)	U1800B
50.	MP408	Ontonagon River Girder Span (Bridge)	U1800C



1. MP 363 Sidnaw Creek
U703 – Concrete Pipe Culv. 20"



2. MP 365 Sidnaw Creek
U707 - Masonry Culv. 10'x7'



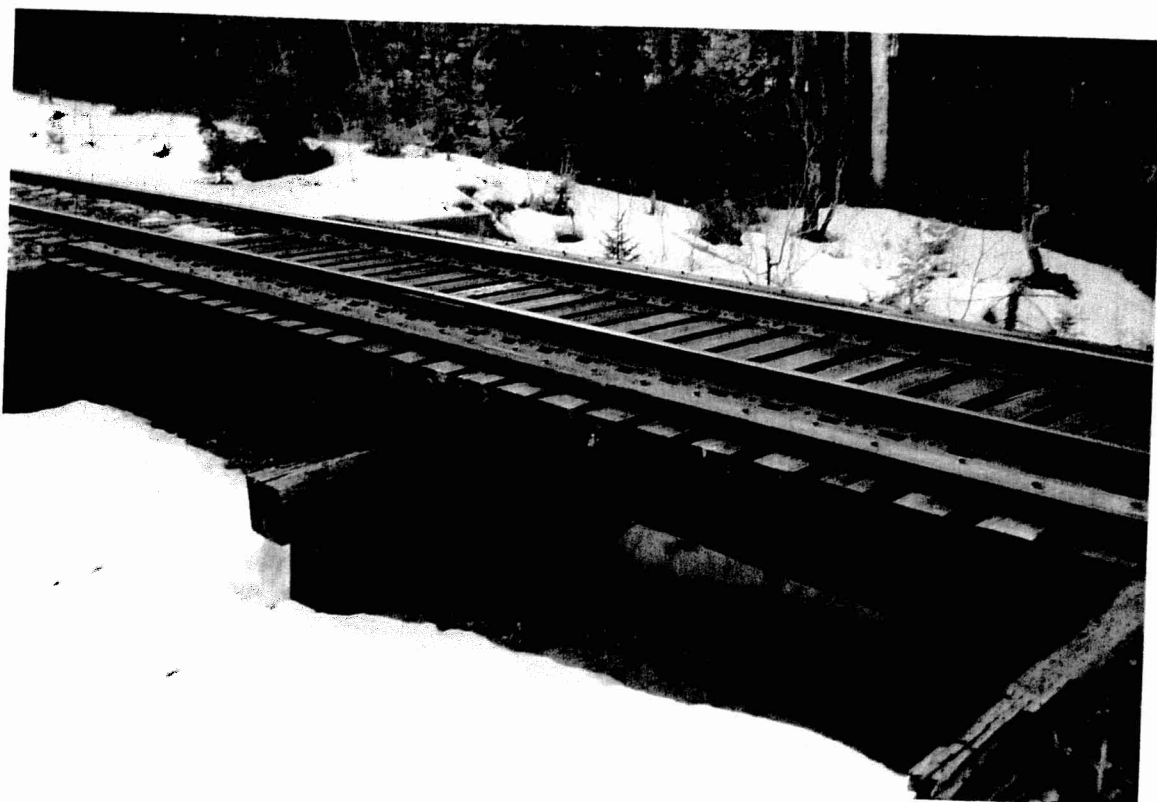
3. MP 371 Conners Creek
U715 – Iron Pipe Culv. 24”



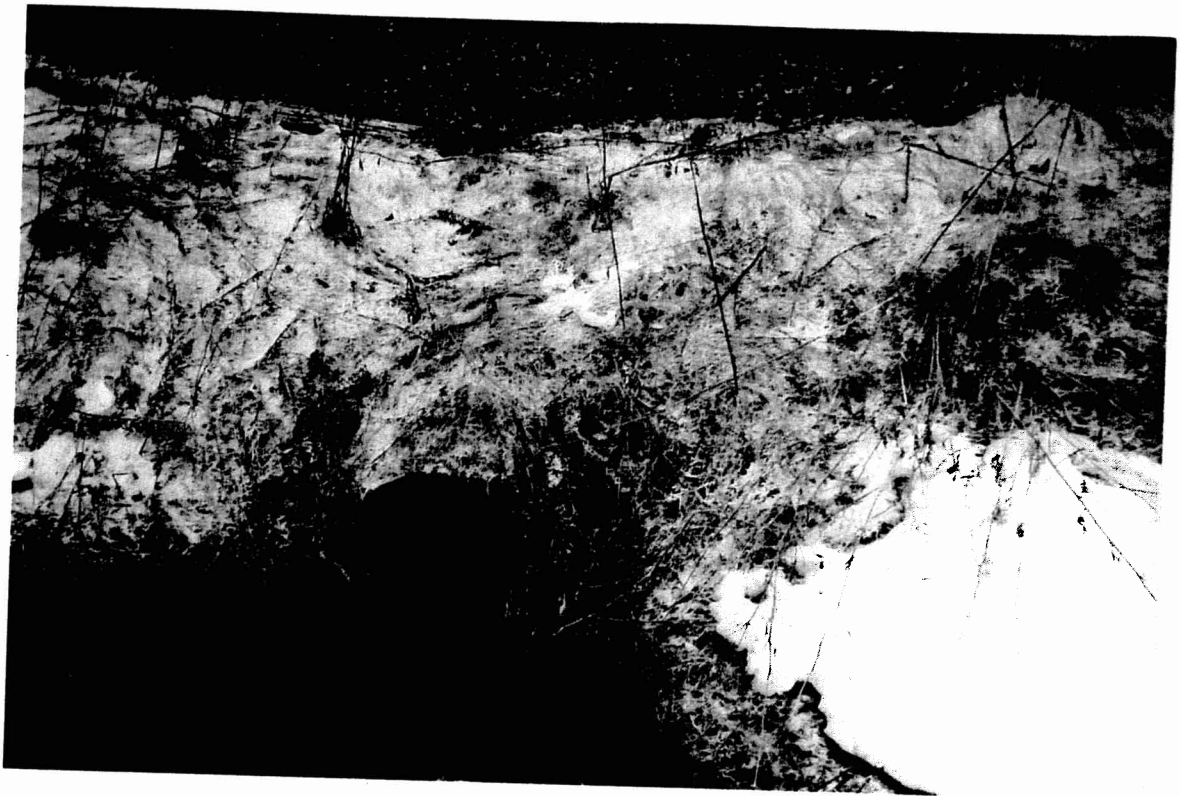
4. MP 374.5 Burritts Creek
U652 – Concrete Pipe 36"



5. MP 374.8 Buritts Creek
U725 - Iron Pipe Culv. 48"



6. MP 376.0 Newholm Creek
U654 - 2 Span 28' Pile Trestle



7. MP 376.8 Newholm Creek
U731 - Iron Pipe Culv. 36"



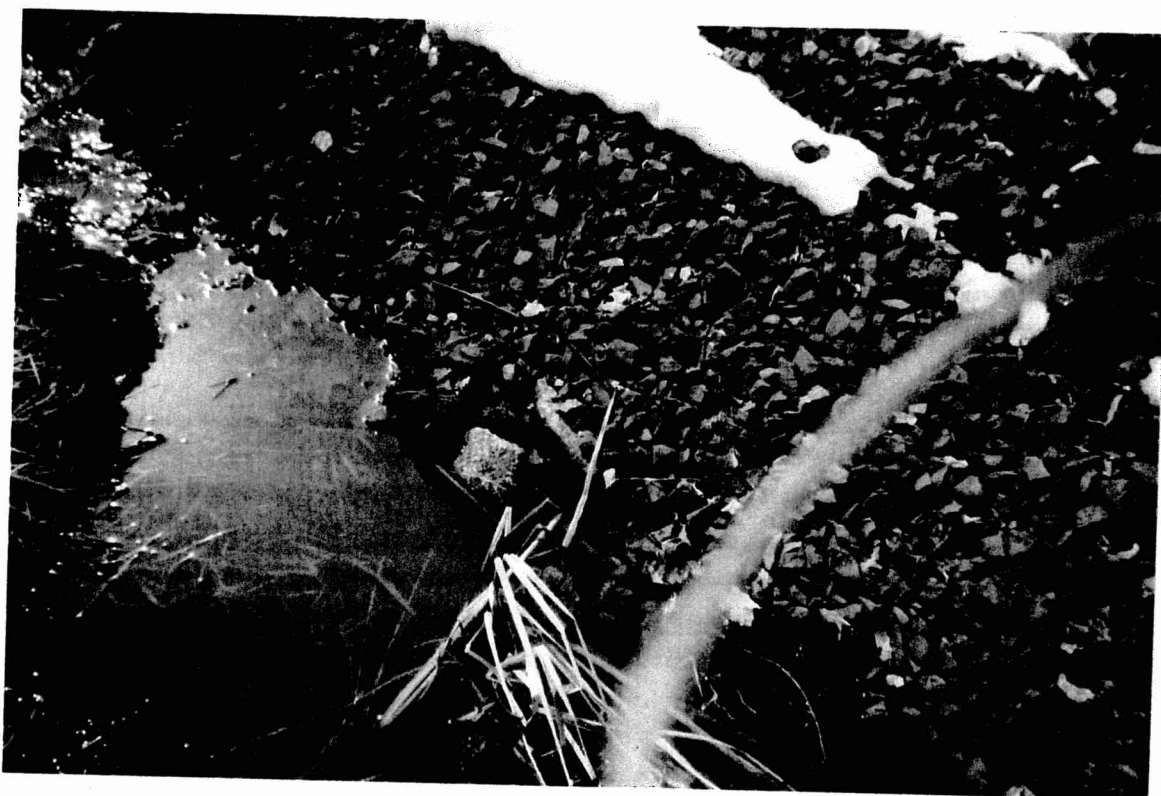
8. MP 377 Newholm Creek
U735 - Iron Pipe Culv. 42"



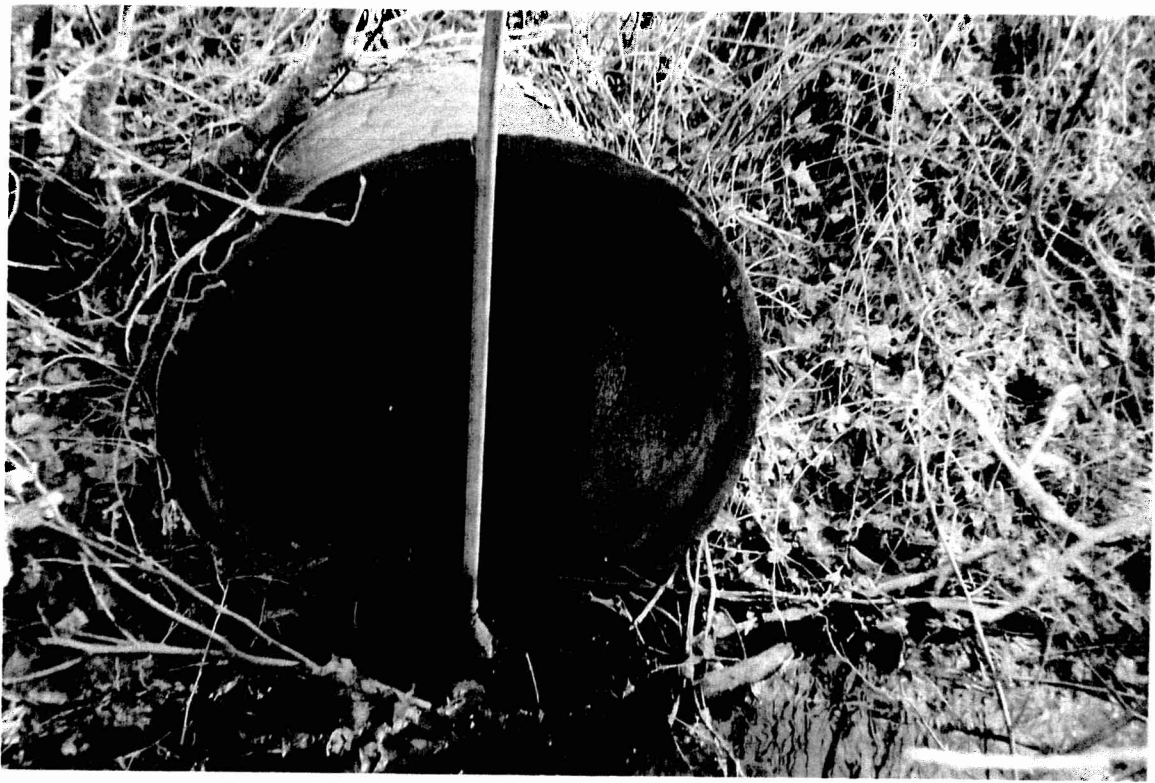
9. MP 377.9 Newholm Creek
U737 – Iron Pipe Culv. 48”



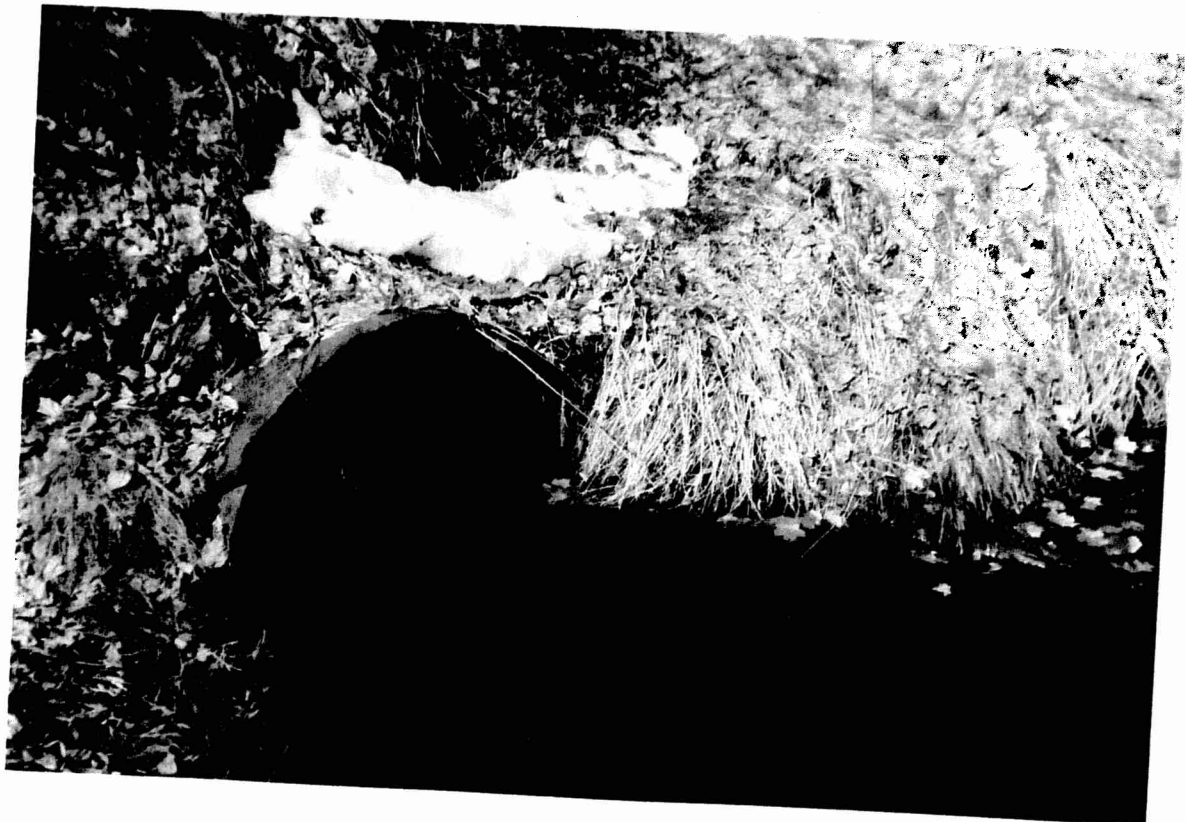
10. MP 378.5 Newholm Creek
U739 – Iron Pipe Culv. 42"



11. MP 379.0 Newholm Creek
U741 - Concrete Pipe Culv. 24"



12. MP 379.5 Leveque Creek
U658 – Iron Pipe Culv. 48"



13. MP 381.3 Pori Creek
U662 – Iron Pipe Culv. 42”



14. MP 382.5 Jug Creek
U664 – Masonry Culv. 12x6
Con.



15. MP 383.3 Hubbull Creek
U751 – Iron Pipe Culv. 42”



16. MP 384.7 Dishinaw Creek
U763 – Iron Pipe Culv. 48"



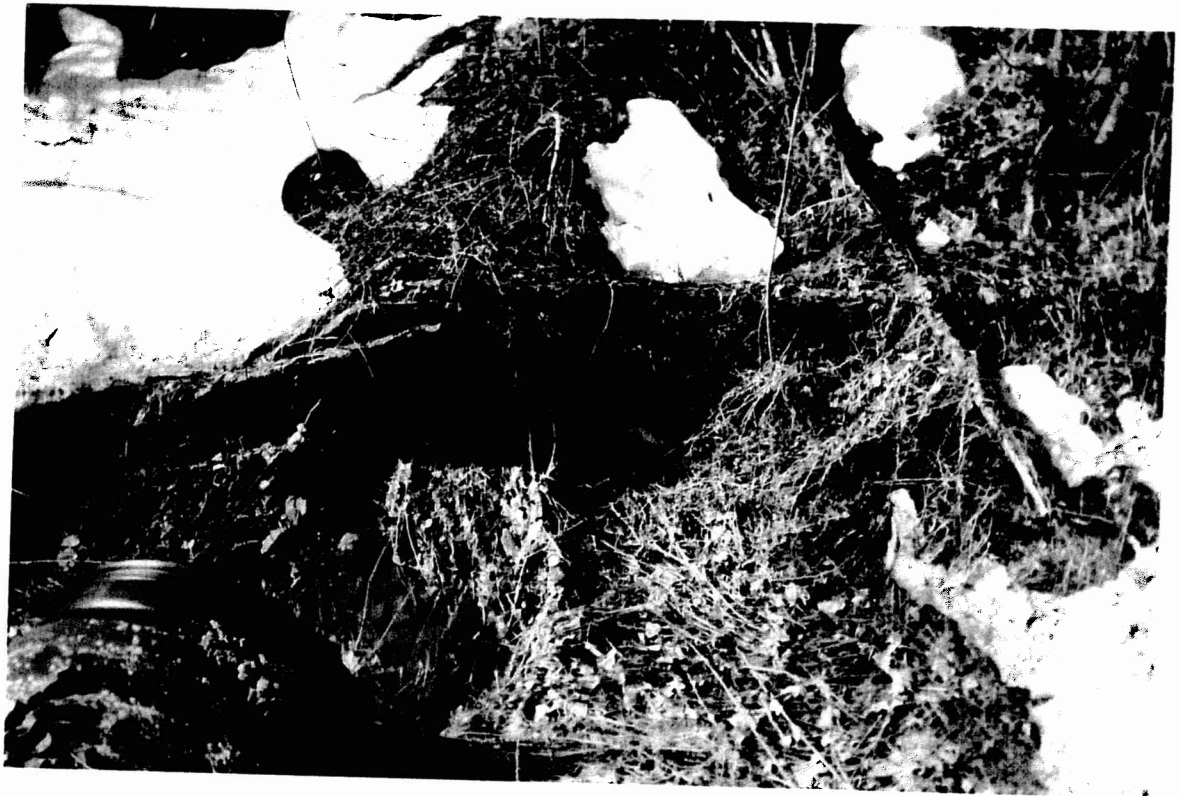
17. MP 385.0 Dishinaw Creek
U767 – Iron Pipe Culv. 20"



18. MP 386.1 Adventure Creek
U771.5 – Masonry Culvert 10x6



19. MP 386.9 Adventure Creek
U775 – Iron Pipe Culv. 24”



20. MP 387.5 Adventure Creek
U778.5 – Concrete Pipe Culv.
24"



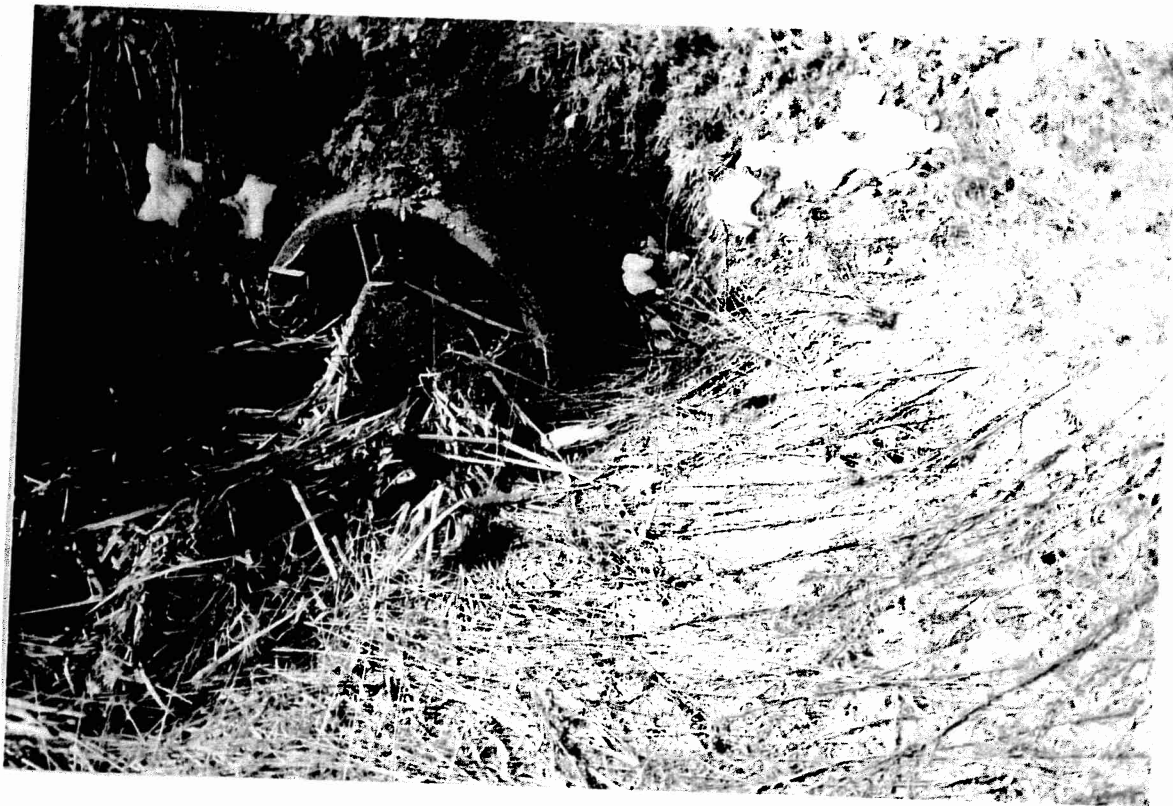
21. MP 387.9 Adventure Creek
U778.5 – Concrete Pipe Culv.
24"



22. MP 388.0 Adventure Creek
U670 – Iron Pipe Culvert 48"



23. MP 388.4 Adventure Creek
U781 – Iron Pipe Culvert 36"

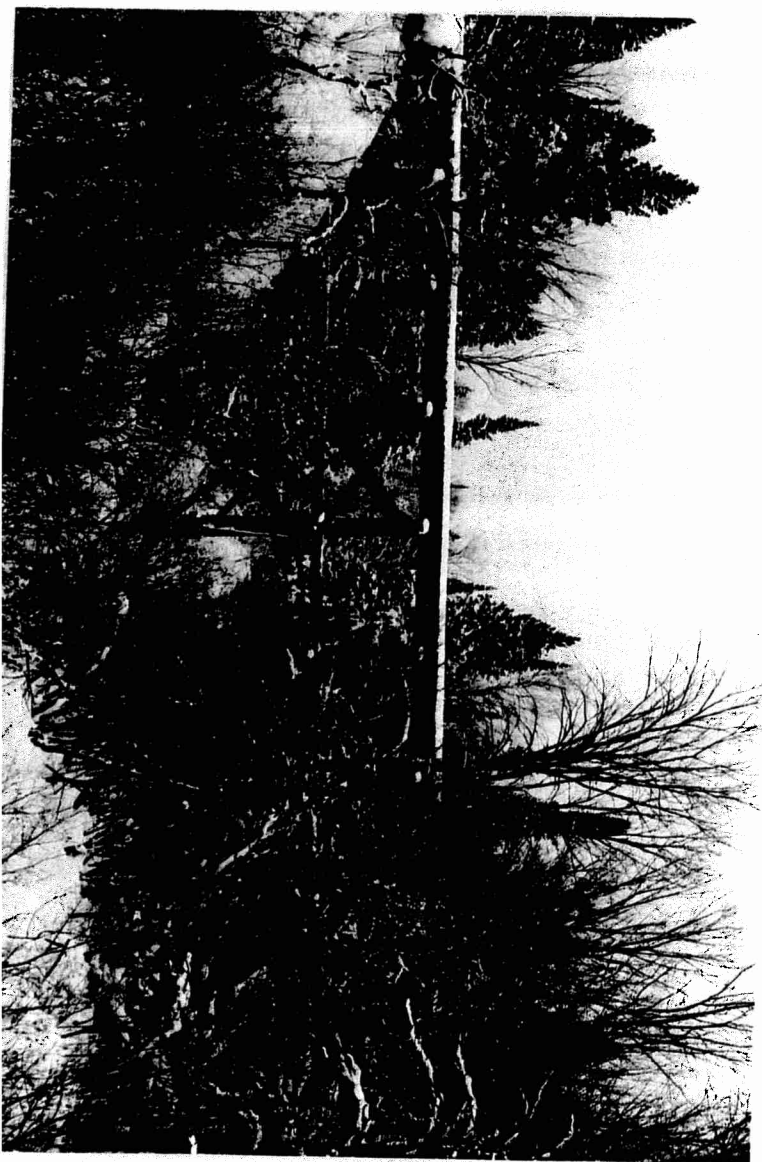
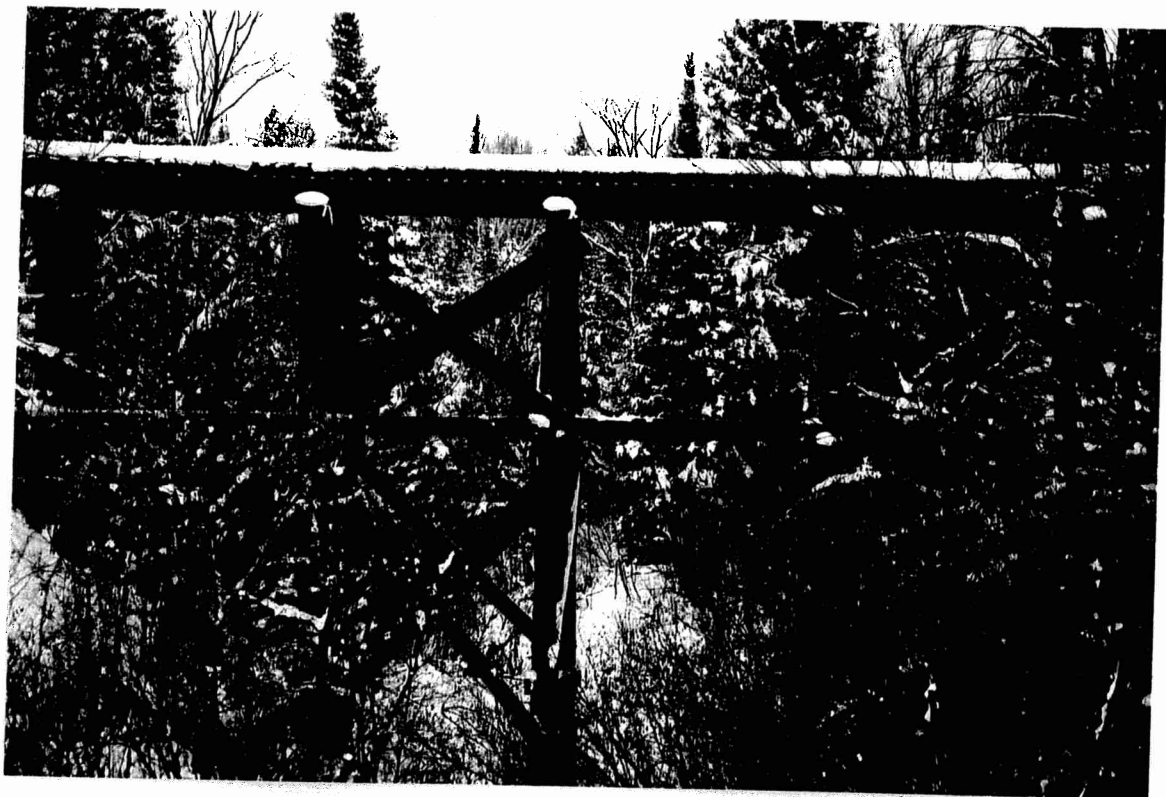


24. MP 388.5 Adventure Creek
U781.5 – Concrete Pipe Culv.
30"



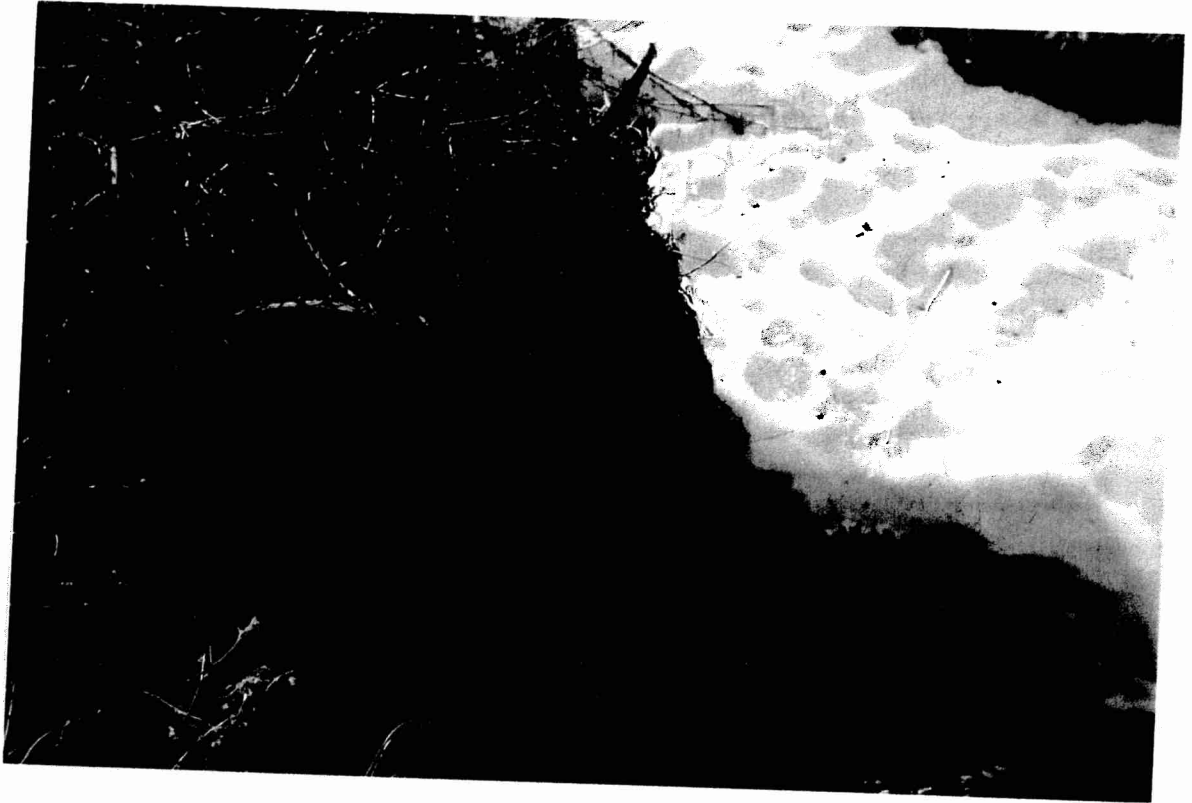
25. MP 388.6 Adventure Creek
U672 - Pile Trestle 9 span 126'

25. MP 388.6 Adventure Creek
U672 - Pile Trestle 9 span 126'





26. MP 388.8 Adventure Creek
U797 - Iron Pipe Culv. 48"



27. MP 388.8 Adventure Creek
U799 – Iron Pipe Culv. 48"



28. MP 389 Adventure Creek
U785 – Iron Pipe Culv. 42”



29. MP 391.1 Deer Lick Creek
U807 – Iron Pipe Culv. 30"



30. MP 391.2 Deer Lick Creek
U808 – Iron Pipe Culv. 36"





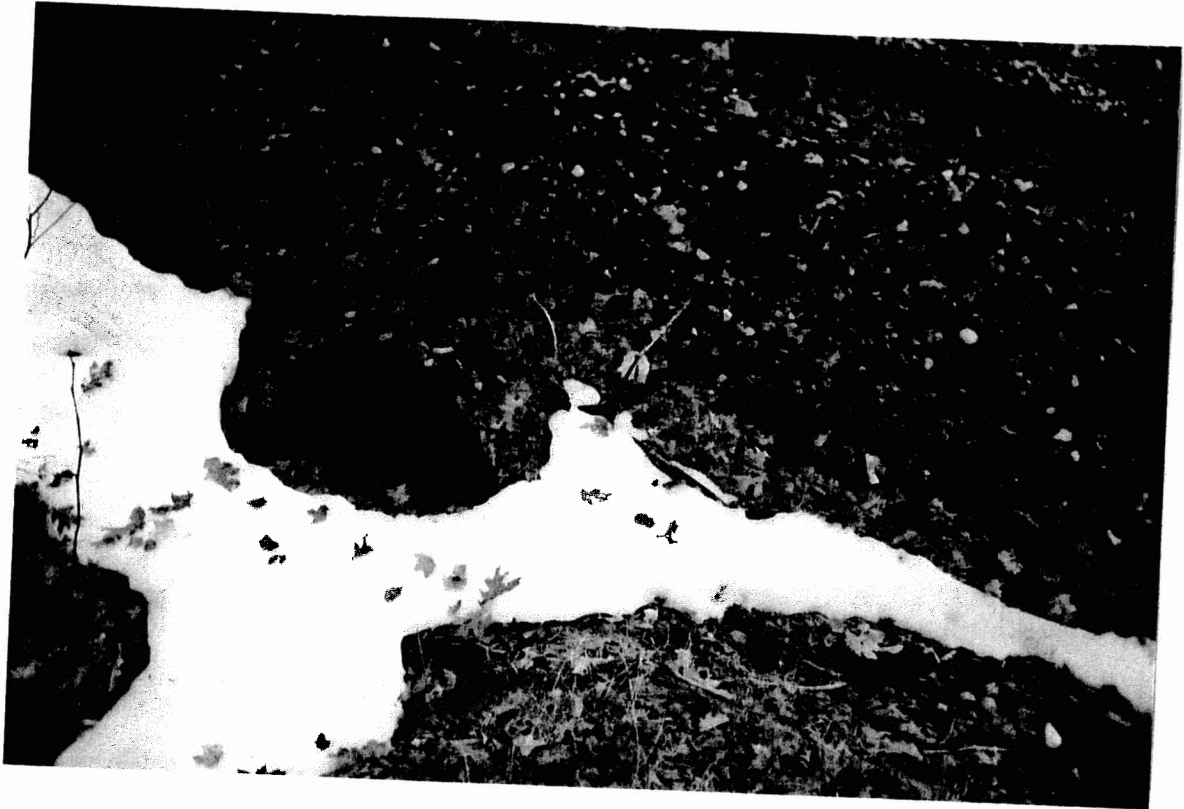
31. MP 391.3 Deer Lick Creek
U811 – Iron Pipe Culv. 36"



32. MP 394.0 Ontonagon River
U821 - Iron Pipe Culv. 48"



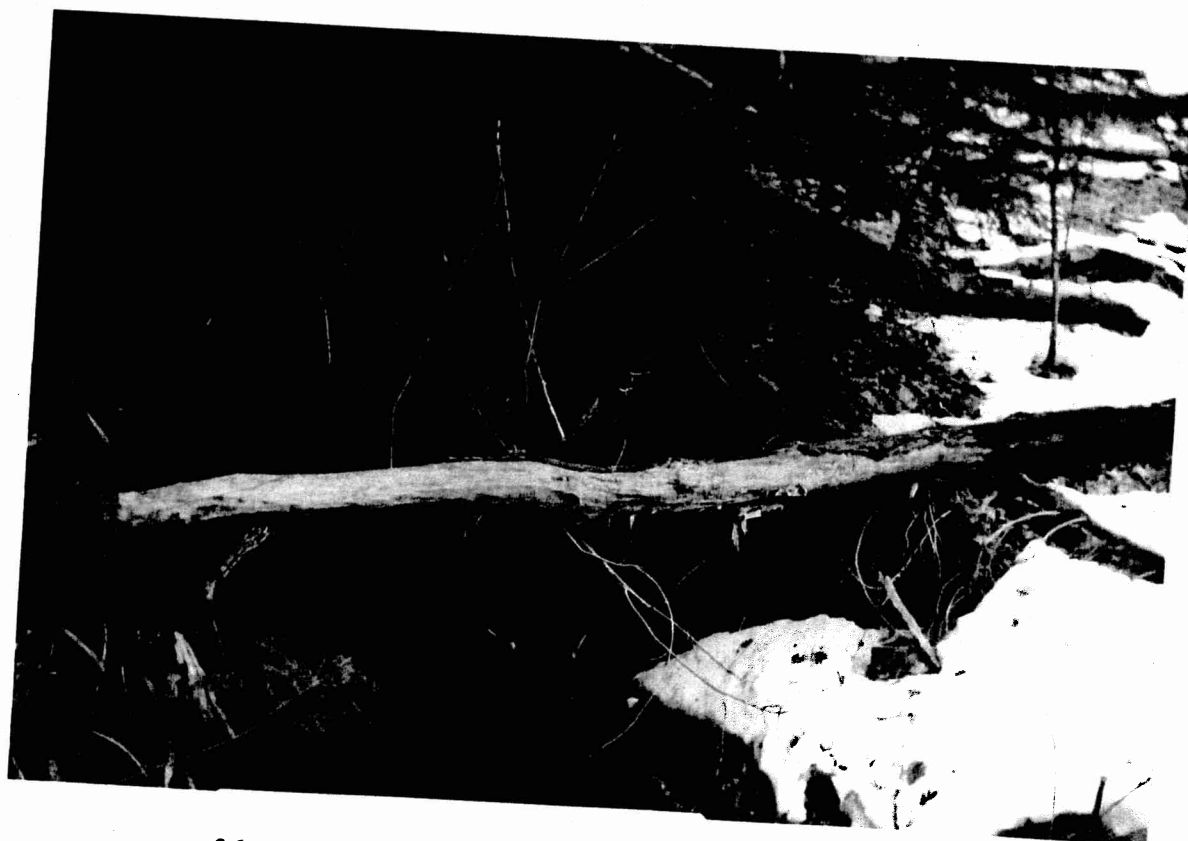
33. MP 394.1 Ontonagon River
U823 – Double 34" Metal Pipe



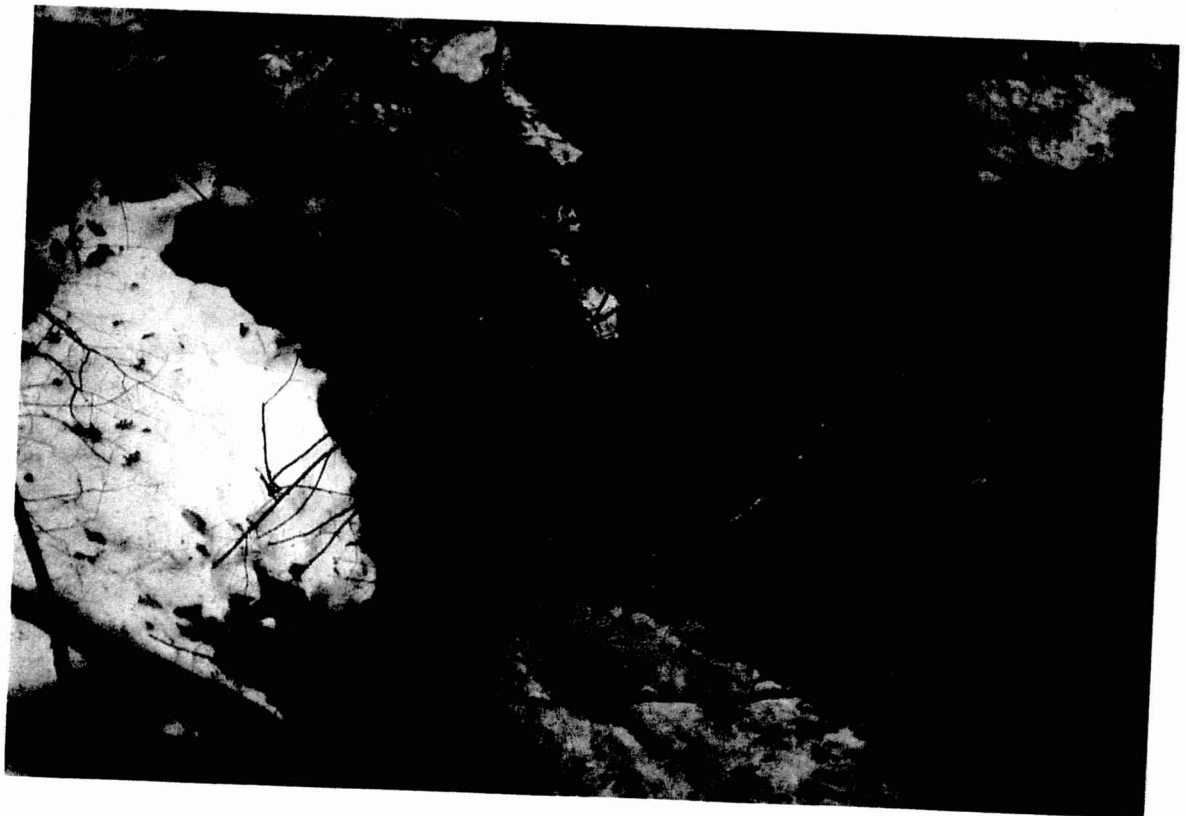
34. MP 394.6 Ontonagon River
U827 - Iron Pipe Culv. 30"



35. MP 395.0 Ontonagon River
U795- Iron Pipe Culv. 42"



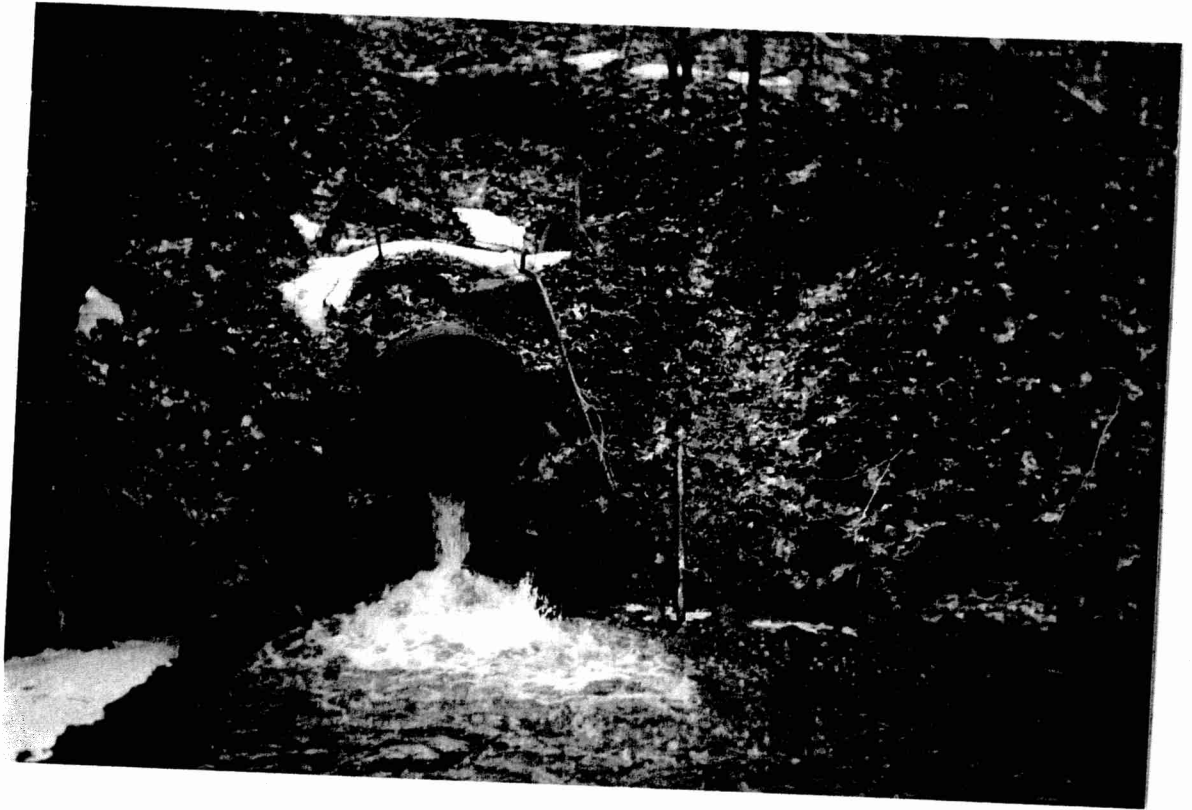
36. MP 395.3 Ontonagon River
U676-Masonry Culv. Arch
10x8 1/2



37. MP 395.9 Ontonagon River
U680- Iron Pipe Culv. 42"



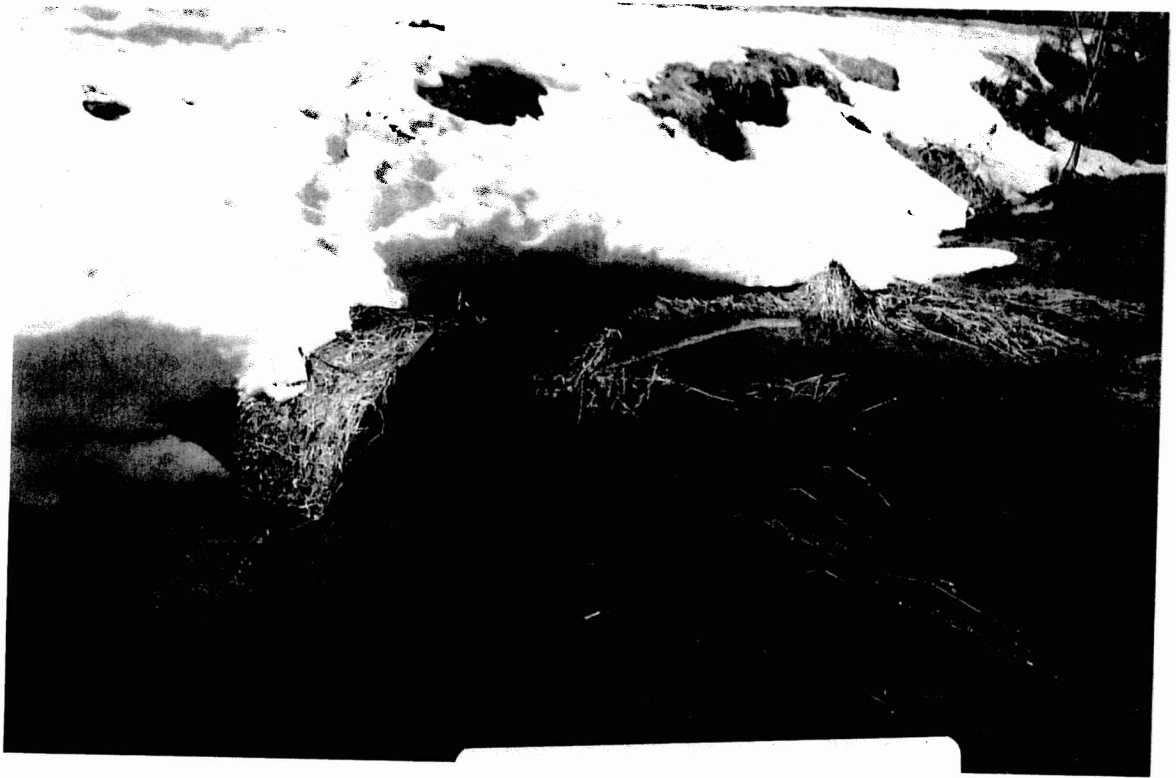
38. MP 396.0 Ontonagon River
U682- Iron Pipe Culv. 36"



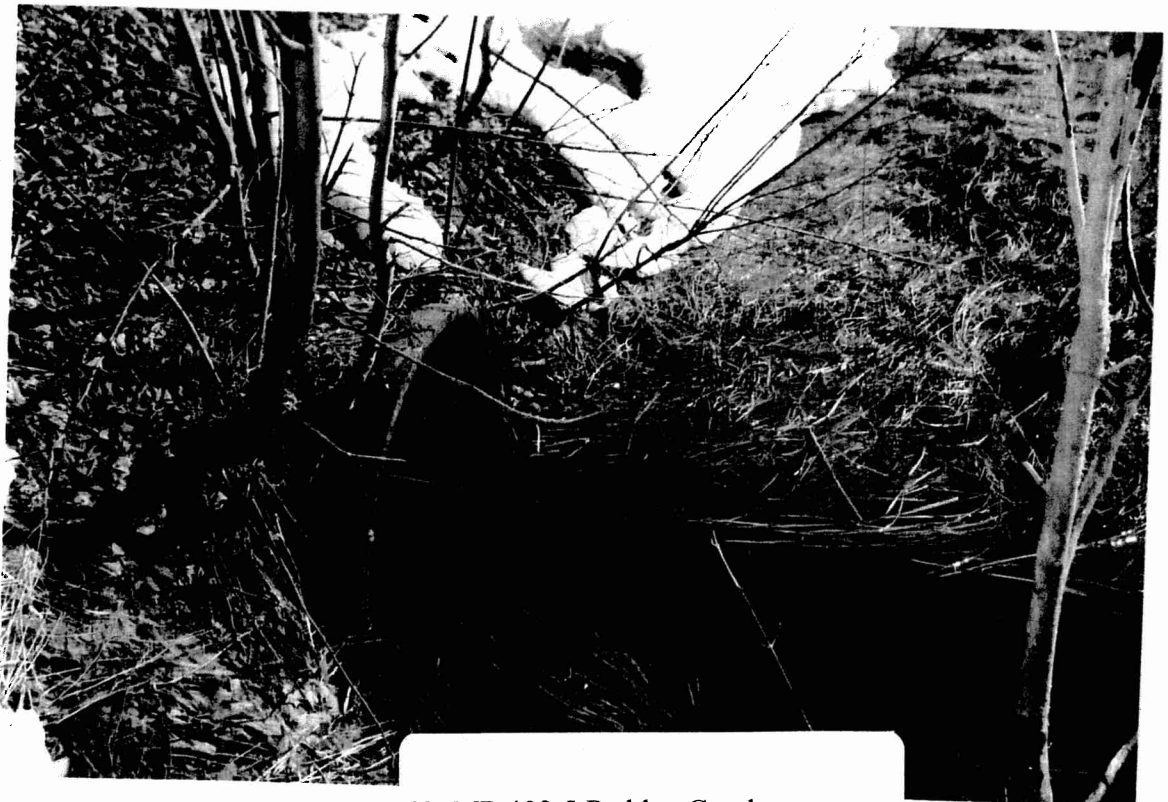
39. MP 396.5 Ontonagon River
U833- Iron Pipe Culv. 30"



40. MP 397.8 Verrier Creek
U845- Iron Pipe Culv. 42"



41. MP 401.0 Austin Creek
U858- Iron Pipe Culv. 42"



42. MP 403.5 Paddys Creek
U873- Iron Pipe Culv. 36"



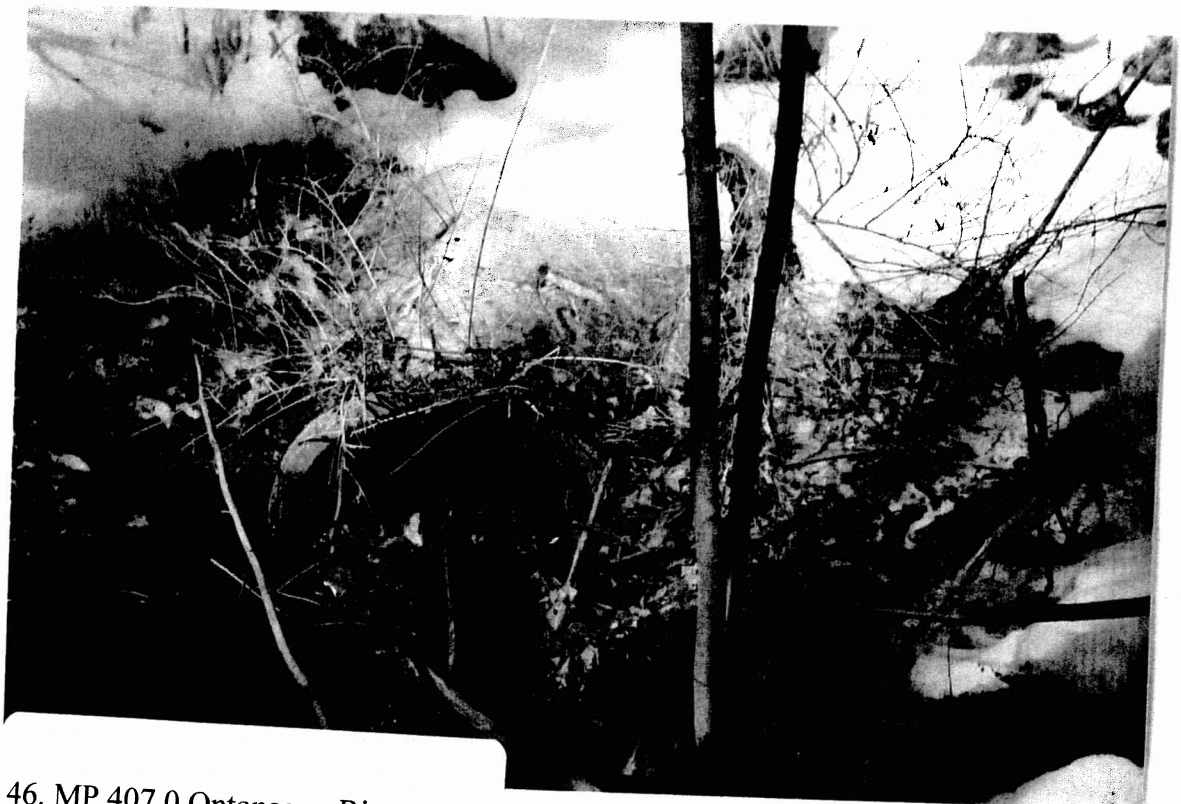
43. MP 403.7 Paddys Creek
U878- Concrete Pipe Culv. 30"



44. MP 404.1 Paddys Creek
U879- Iron Pipe Culv. 30"

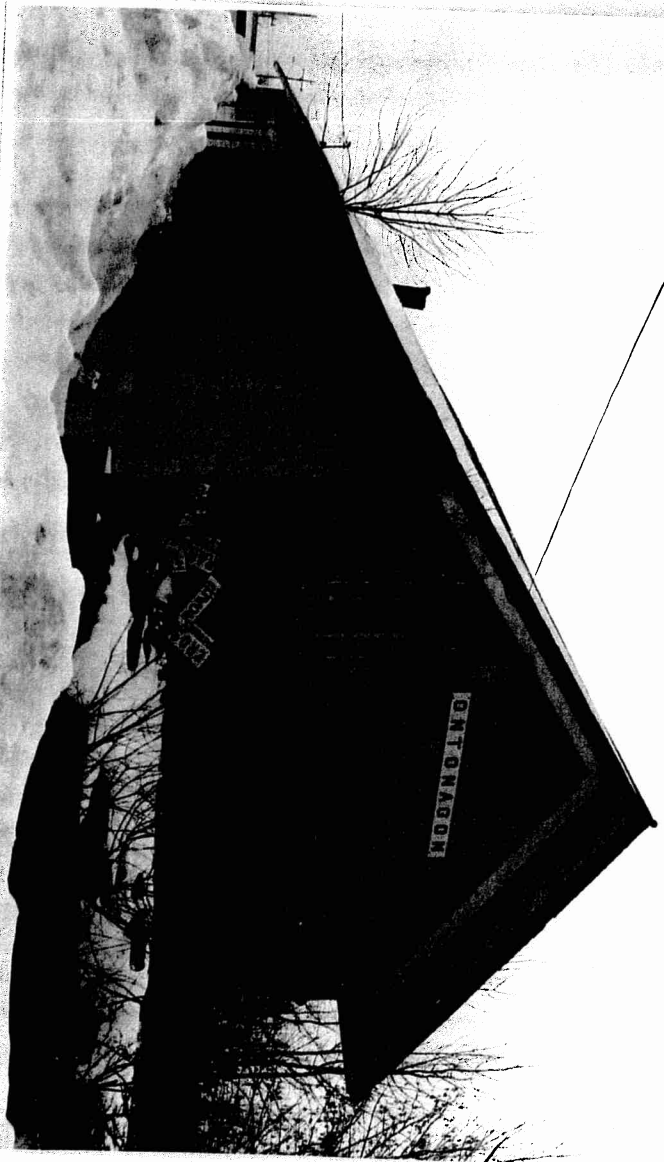
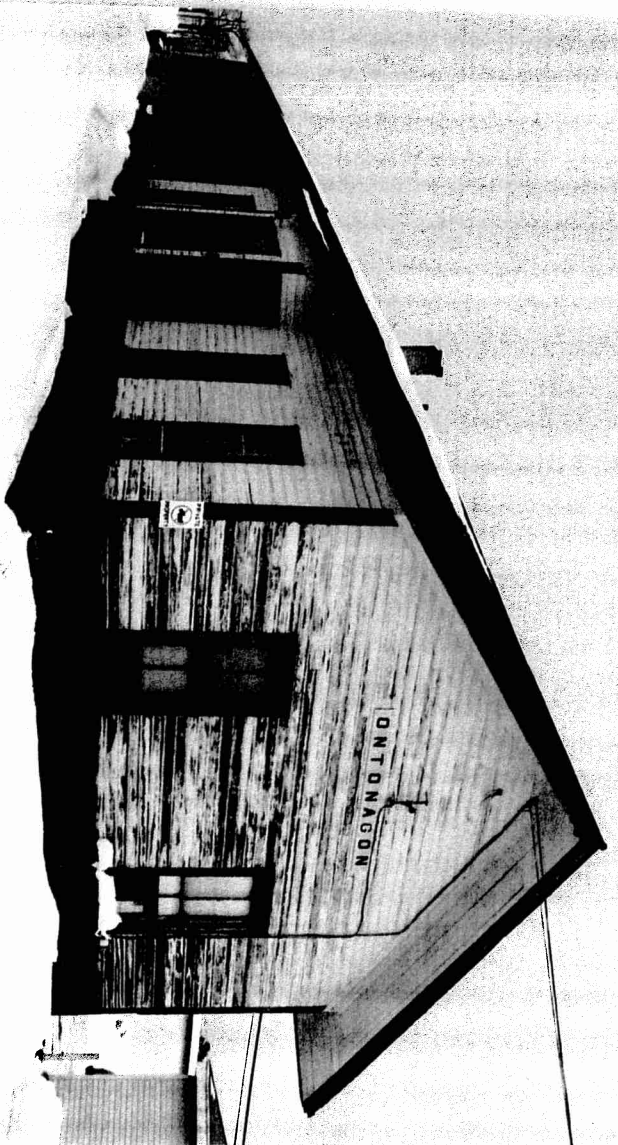


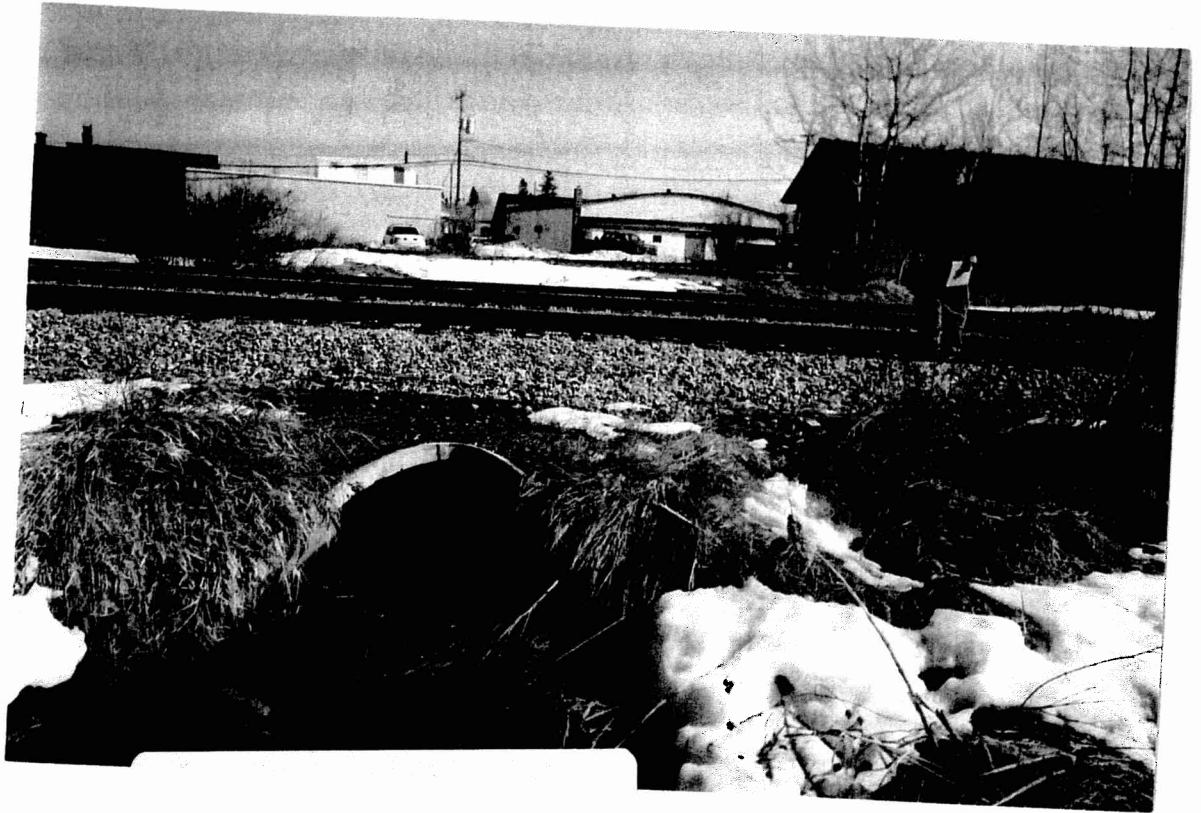
45. MP 404.6 Paddys Creek
U885- Iron Pipe Culv. 42"



46. MP 407.0 Ontonagon River
U885- Concrete Culv. Pipe 42"

46a. MP 407.5 Ontonagon Depot





47. MP 407.8 Ontonagon River
U696- 6' Concrete Culv.



48. MP 407.9 Ontonagon River
U1800A - 28' Steel Span

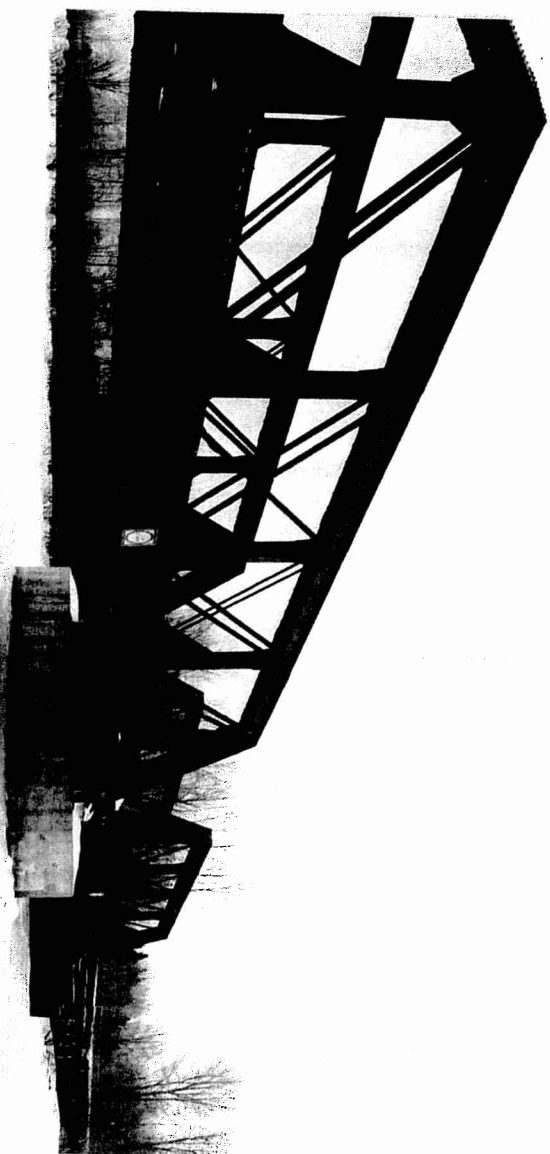
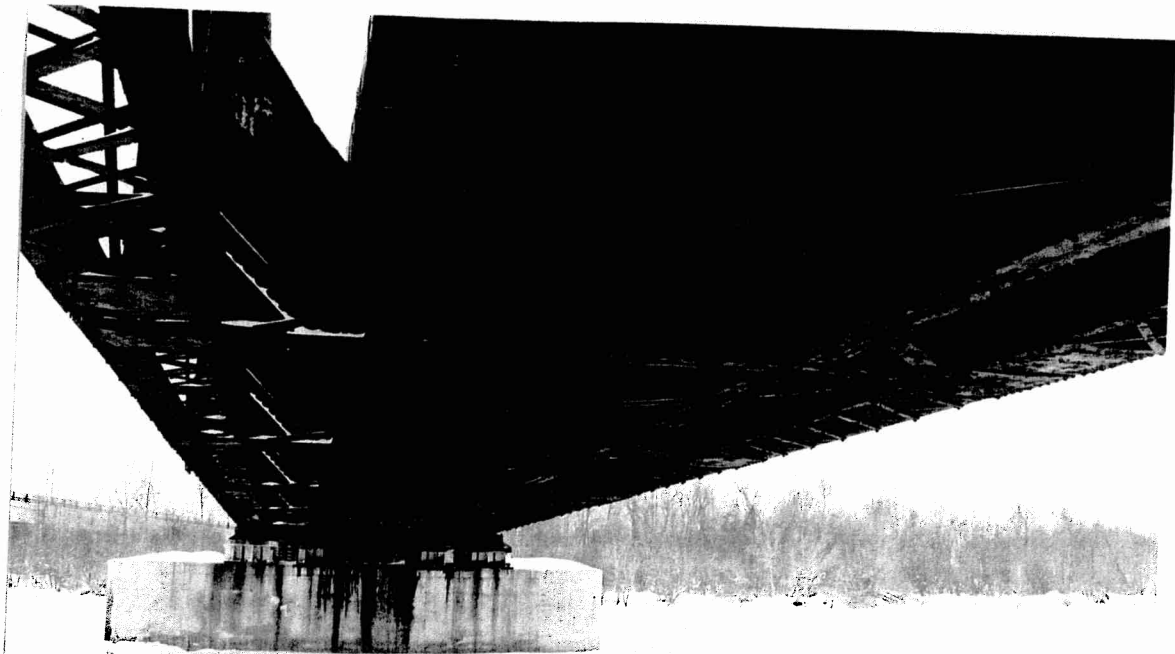


49. MP 407.95 Ontonagon River
U1800B – Pile Trestle 1 span



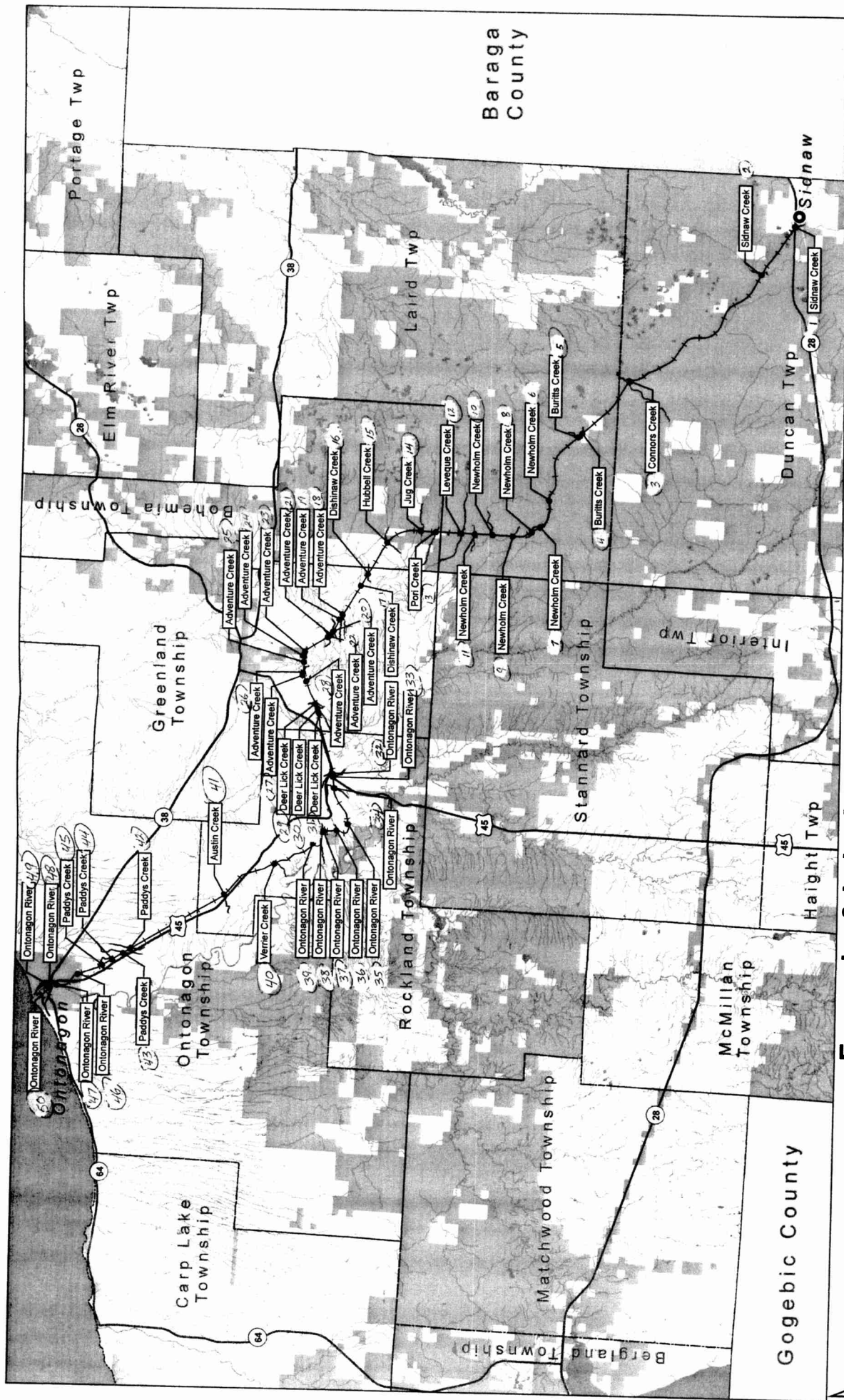
50. MP 408 Ontonagon River
U1800C – 5H Girder Span from
L – 334'

50. MP 408 Ontonagon River
U1800C - 5H Girder Span from
L - 334'



1. The first step in the process of identifying a problem is to recognize that a problem exists. This involves gathering information about the situation and identifying the specific issue that needs to be addressed.





**Escanaba & Lake Superior Railroad Water Crossings
Ontonagon to Sidnaw**

