



#E1-25565

November 8, 2016

Howard D. McFadden
Senior General Attorney – Real Estate
Norfolk Southern Corporation
1200 Peachtree Street, NE 12th floor
Atlanta, GA 30309

Re: Proposed Rail Line Abandonment Petition, Milepost SC 0.33 – SC 2.3: Additional Information
Charleston, Charleston County, South Carolina
SHPO Project No. 16JS0236
Docket No. AB-290

Dear Mr. McFadden:

Thank you for your letter of October 5, 2016 and attached maps that we received on October 10 in response to our June 21, 2016 letter regarding this undertaking. We have also received the Surface Transportation Board's (STB) Decision and Environmental Assessment (EA) regarding this project on September 9 and September 12, respectively.

The State Historic Preservation Office is providing comments to the Surface Transportation Board pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR 800. Consultation with the SHPO is not a substitution for consultation with Tribal Historic Preservation Offices, other Native American tribes, local governments, or the public.

We appreciate the additional information provided about the undertaking, including the role of the Surface Transportation Board and an assessment of effect on historic properties. The undertaking includes a 1.97 mile (10.92 acre) railroad right of way existing between Milepost SC-0.33 to Milepost SC-2.3, or from Courtland Street to a point approximately 190 feet north of Woolfe Street. Norfolk Southern has entered into an agreement with Lowcountry Lowline, a South Carolina non profit, to allow for interim trail use of the right of way under provisions of the National Trail Systems Act.

As shown on the enclosed maps we are providing, it appears that portions of this right of way (from Woolfe Street to approximately Sheppard Street) are within the boundary of the William Aiken House, Associated Railroad Structures, listed in the National Register of Historic Places and designated as a National Historic Landmark. While it is correct that the William Aiken House is east of the railroad right of way, the boundary includes the railroad right of way up to approximately Sheppard Street and is historically significant, as described on page 10 of the nomination form (see <http://www.nationalregister.sc.gov/charleston/S10817710007/index.htm>). The conversion of the right of

way to a pedestrian trail therefore has the potential to effect historic properties. As such, we cannot concur with your determination that no historic properties are present or affected.

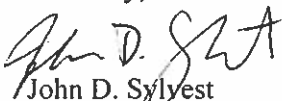
In concept, our office believes the conversion of the abandoned right-of-way to a linear walking trail could preserve the historic character and significance of the railroad right of way, and result in finding of no adverse effect. However, without design plans for how the walking trail will be implemented, it is premature to conclude an assessment of effect. It is important as the trail plans are developed that existing conditions are documented. While the nomination noted the “most” of the tracks had been removed, are there any existing features that remain? If so these should be documented and incorporated into the design of the trail. The trail design should also reflect the railroad origins of the corridor and incorporate information about the history of the railroad and development of the corridor. The design should retain “the clear, unimpeded alley [that] provides the best visual expression of the concept of right-of-way, the spine to which the workings of a railroad—shops, depots, warehouses are fixed.”

We recommend that design plans be undertaken as a condition of part of the abandonment petition process. It appears that the STB’s EA conditions would support addressing the design and design review for the historic section of the right of way. Alternatively, does the Norfolk Southern Agreement of Purchase and Sale include any specific provisions for design or design review after the conveyance that could incorporate the concepts noted above? Will the City of Charleston provide any design review through the Board of Architectural Review or another review process?

Finally, as the project includes a National Historic Landmark, we continue to recommend consultation with the Secretary of the Interior and the Advisory Council on Historic Preservation pursuant to 36 CFR 800.10. The STB’s EA notes that these consulting parties have been copied but we have yet to receive any comments they may have regarding this undertaking.

If you have any questions, please contact me at (803) 896-6129 or jsylvest@scdah.sc.gov.

Sincerely,



John D. Sylvest
Project Review Coordinator
State Historic Preservation Office

cc: Surface Transportation Board
Advisory Council on Historic Preservation
National Park Service, SE Regional Office, NHL Branch

technology does not represent an impediment to the company's plans to expand its product line and to begin upgrading those already on the market for industrial, or dual use, applications. These plans are being implemented, he says, "at the same rate as ever."

The company does not expect any significant changes in the demand for its dual standard 600 series line in 1997.

[illegible]

STATION 6+00 TO STATION 71+00
SCALE: H. - 1"= 40' V. - 1"= 40'

STAG CORP. BUILDING NO. 1 C. F. MONTGOMERY CHAMBERLAIN-7700
PACIFIC AVENUE, SUITE 101, S.F. 94115, CALIF. 415-774-1100

04888

approximate boundary of
William Aiken Hines, Associated Railroad Structures
NEHP

SCDAH S10817710007.pdf South Carolina ArchSite SC ArchSite Public Web

www.sarchsite.org/PublicView.aspx

Legend Search Layers

Legend

- National Register Points**
 - Not Eligible or Requires Evaluation
 - Eligible
- National Register Polygons**
 - Historic Structures
 - Not Eligible or Requires Evaluation
 - Eligible
 - Historic Areas
 - Not Eligible or Requires Evaluation
 - Significant Resource/Requires Evaluation

SC ArchSite Public Web Map

Zip Code, city, etc

Hybrid

National Register Polygons: Aiken, William, House and Associated Railroad Structures

Resource Name	Aiken, William, House and Associated Railroad Structures
ADDRESS	456 King St.
CITY	Charleston
COUNTY	Charleston
ACREAGE	20
CERTIFICATION	NATIONAL HISTORIC LANDMARK
Certification Date	19661015
Year of Significance	1811
Zoom to	

Port of Charleston, Columbus St

William Aiken House, Associated Railroad Structures boundary from SC ArchSite public view map

<http://www.sarchsite.org/PublicView.aspx>

From the nomination form for the William Aiken House, Associated Railroad Structures available at <http://www.nationalregister.sc.gov/charleston/S10817710007/index.htm>

Page 3: Railroad Right-of-Way

An important part of the railroad character of this NHL is provided by the railway right-of-way which runs north-south from the Line Street shops out into John Street. Though most of the tracks have long been removed, the clear, unimpeded alley provides the best visual expression of the concept of right-of-way, the spine to which the workings of a railroad—shops, depots, warehouses are fixed. (See boundary justification)

Page 10: Verbal Boundary Description and Justification

2. Railroad Right-of-Way – An Addition

Beginning at a point approximately 10' east of the east siding of the railroad track at the south curb of Mary Street, proceed north to the rear boundary line of the Line Street or Shop parcel, thence west to a point approximately 10' west of the west siding of the railroad tracks, thence south to the south curb of Mary Street; thence east to the point of origin.

Justification

The railroad right-of-way should be added because it is a physical link between the portions of the complex and because it is significant in the railroad's early history concerning efforts to expand into the southern peninsula, to establish a railroad in the central business district of Charleston, and eventually a linkage with the sea. Originally terminated at Line Street which would have been distant from the central city, the railroad struggled for several years to gain public acceptance and access to the final terminus in the John, Mary and Ann Street area. Linkage to wharfage in Charleston harbor took even longer. The right-of-way connecting these two points (original terminus at Line Street with the site of major shop, warehousing and passenger facilities in the John, Mary and Ann Street areas) is a strong visual feature in the concept of right-of-way and the difficult struggle most railroads experienced in establishing their routes. Perhaps of all the physical features remaining, the Line Street – John Street right-of-way has the most integrity and best represents the concept of right-of-way.