

E1-1631
DHW

September 16, 2005

Ms. Diana Wood
Surface Transportation Board
Case Control Unit
1925 K Street, NW
Washington, DC 20423-0001

Re: Docket No. AB-490 (Sub-No. 1X)
Greenville County Economic Development Corporation
Petition for Exemption for Partial Discontinuance and Partial
Abandonment
Greenville County, South Carolina

Dear Ms. Wood:

Thank you for bringing to our attention several letters received by the Surface Transportation Board in regards to the Environmental Assessment prepared for the above-referenced project. The northern segment of the above-referenced e-mail is proposed for abandonment, while the southern segment is proposed for discontinuance of service. This letter serves as a revision to our earlier letter dated June 24, 2005, in which misinterpreted geographical information was referenced.

The National Historic Preservation Act, as amended, requires the Surface Transportation Board to consult with the relevant State Historic Preservation Office to assess the effects of its undertakings on historic properties. All federal agencies are required to take into account the potential for historic properties to be adversely affected by federal actions. The term "historic properties" refers to those buildings, structures, or sites that are listed in or eligible for listing in the National Register of Historic Places. An undertaking will have an "adverse effect" on a historic property if it significantly alters the characteristics of that property that contribute to its historic significance.

Our office received information from Baker & Miller, PLLC on this proposed undertaking on May 27, 2005. The Historic Report sent to our office determined the Area of Potential Effects (APE) for this project to be the railroad right-of-way. Our office believes the APE should be expanded to include the area within 500 feet of the railroad right-of-way. We provided comments to the Surface Transportation Board on June 24, 2005, stating that two historic properties had been identified in the APE for the project based on what we could determine from the large-scale maps provided. It appears that both the Monaghan Mill and the Woodside Mill Village, two districts listed in the National Register of Historic Places, are within the APE for the proposed project. Based on the untitled maps provided to our office, we mistakenly located the Monaghan Mill and the Woodside Mill Village on the southern segment of the railroad proposed for abandonment. Subsequent

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letters received by the Surface Transportation Board by James Groome on August 30, 2005 and the Western Carolina Railway Service Corporation on September 9, 2005 pointed out this error. Our revised comments on the effect of the railroad discontinuance and abandonment on these two historic properties are as follows:

Two properties listed in the National Register, the Monaghan Mill and the Woodside Mill Village, are within the APE of the undertaking along the *northern* segment of the railroad proposed for abandonment. While railroad line provided transportation for goods and services to these mills, this railroad is not a contributing element to either historic property. Therefore, the proposed abandonment will have **no adverse effect** on the historic integrity of the Monaghan Mill or the Woodside Mill Village

The Historic Report also provided photographs of trestles and bridges along the railroad. Our office had previously reviewed one of the structures. The steel truss bridge over Woodruff Road on the southern segment of the project was determined **not eligible** by our office as part of the South Carolina Department of Transportation's survey as part of the proposed widening of Woodruff Road. Additional information provided in a letter to the Surface Transportation Board from the Western Carolina Railway Service on September 9, 2005, states that the Historic Report addressed only four trestles and bridges, not the actual ten that exist on both segments of the railroad. Based on the information provided by both the Historic Report and the Western Carolina Railway Service, our office believes that the trestles along the railroad are **not eligible** for listing in the National Register.

Our office knows of no properties included in or eligible for inclusion in the National Register along the *southern* segment of the railroad proposed for discontinuance.

These comments are provided as evidence of your consultation with the State Historic Preservation Office pursuant to Section 106 of the National Historic Preservation Act, as amended. If you have questions or need additional clarification, please call me at (803) 896-6169.

Sincerely,

Rebekah Dobrasko
Review and Compliance Coordinator
State Historic Preservation Office