



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

September 1, 2022

Heather Gibb, Deputy SHPO
 State Historical Society of Iowa
 600 East Locust Street
 Des Moines, Iowa 50319

Re: Cultural Resources Survey in Support of the Proposed Acquisition of Kansas
 City Southern Railway by the Canadian Pacific Railway

Dear Ms. Gibb,

The Surface Transportation Board's (Board's) Office of Environmental Analysis (OEA) is pleased to submit this Cultural Resources Survey Report in support of the OEA's review of a proposal by Canadian Pacific Railway et al. (CP) and Kansas City Southern Railway et al. (KCS) for CP to acquire KCS (Proposed Acquisition). The Proposed Acquisition is an undertaking subject to the Board's federal jurisdiction. If the Board authorizes this Proposed Acquisition, CP and KCS would combine to form an integrated system to be known as Canadian Pacific Kansas City (CPKC), which would be the first railroad to connect Canada, the United States, and Mexico. As part of the review process, OEA has prepared a Draft Environmental Impact Statement (EIS) that assesses the potential environmental impacts of the Proposed Acquisition. OEA is also evaluating the potential impacts of the Proposed Acquisition on historic properties, in accordance with Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108), the Section 106 implementing regulations (36 C.F.R. Part 800), and the Board's environmental regulations (49 C.F.R. Part 1105).

Consistent with past practice in merger cases and the Board's regulations at 49 C.F.R. § 1105.8(b)(1), OEA focused the Section 106 review on 25 planned capital improvements that CP and KCS intend to add within the existing rail right-of-way (ROW) if the Board authorizes the Proposed Acquisition. The 25 planned capital improvements would include adding 10 new passing sidings, extending 13 existing sidings, adding a section of double track, and adding a section of facility working track along the CPKC network within the rail ROW. The planned capital improvements are the only outcomes of the Proposed Acquisition that could have the potential to affect cultural resources. Of the 25 planned capital improvements, eight are located in Iowa.

Capital Improvement Location	County
MP 24 (Bellevue)	Jackson
Camanche	Clinton
Deer Creek	Clinton
Letts	Louisa

Capital Improvement Location	County
Moravia	Monroe
Ottumwa	Wapello
MP 71 (Turkey River)	Clayton
MP 255 (Washington)	Washington

On behalf of OEA, Vanasse Hangen Brustlin, Inc. (VHB), OEA's third-party contractor, undertook background research, field survey, and documentation of historic properties within the Area of Potential Effects (APE) for the planned capital improvements.

The APE as defined in 36 C.F.R. § 800.16(d), is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties if any such properties exist. The above-ground APE for the planned capital improvements extends the length of the planned capital improvements within the existing rail ROW as well as a buffer on each side of the ROW to account for potential setting, visual, noise, or other impacts from construction activities. All above-ground resources 45 years of age or older present within this broader above-ground APE were surveyed and documented. The above-ground APE varies depending upon actual field conditions, incorporating factors such as topography, vegetation, and intervening buildings. The table below summarizes our findings for above-ground resources.

Capital Improvement Location	County	Total Resources 45 Years of Age or Older	Eligible Resources
MP 24 (Bellevue)	Jackson	44 resources	1 resource: Chicago, Milwaukee & St. Paul Railroad segment (C-MARQ-03)
Camanche	Clinton	4 resources	1 resource: Clinton Water Pollution Control Plant (IA-CA-001)
Deer Creek	Clinton	6 resources	0 resources
Letts	Louisa	1 resource	1 resource: Rock Island Line segment (C-OTTU-02)
Moravia	Monroe	1 resource	1 resource: Chicago, Milwaukee & St. Paul Railroad segment (C-LARE-01)
Ottumwa	Wapello	4 resources	1 resource: Chicago, Milwaukee & St. Paul Railroad segment (C-LARE-01)
MP 71 (Turkey River)	Clayton	2 resources	1 resource: Chicago, Milwaukee & St. Paul Railroad segment (C-MARQ-03)
MP 255 (Washington)	Washington	1 resource	1 resource: Rock Island Line segment (C-OTTU-02)

The archaeology APE for the Phase I archaeological survey is confined within the existing rail ROW, where ground disturbing activities could potentially occur. Results from the Iowa archaeological survey will be sent to you in early September when reporting is complete.

The Proposed Acquisition and associated planned capital improvements would have no adverse effect on the Chicago, Milwaukee & St. Paul Railroad segment (C-MARQ-03), the Clinton Water Pollution Control Plant (IA-CA-001), the Rock Island Line segment (C-OTTU-02), or the Chicago, Milwaukee & St. Paul Railroad segment (C-LARE-01) as no impacts are anticipated that would alter the qualities that make the properties eligible for the National Register. OEA's determinations are supported by the findings presented in the attached reports, prepared by VHB. If you have any questions about the reports, or require additional information, please do not hesitate to contact Alan Tabachnick, Historic Preservation Specialist, at alan.tabachnick@stb.gov or 202-245-0367.

Sincerely,

A handwritten signature in black ink, appearing to read "Danielle Gosselin".

Danielle Gosselin
Director
Office of Environmental Analysis
Surface Transportation Board

Attachments:

- MP 24 (Bellevue) Planned Capital Improvement: Historic Architectural Survey Report (HASR)
- Camanche Planned Capital Improvement HASR
- Deer Creek Planned Capital Improvement HASR
- Letts Planned Capital Improvement HASR
- Moravia Planned Capital Improvement HASR
- Ottumwa Planned Capital Improvement HASR
- MP 71 (Turkey River) Planned Capital Improvement HASR
- MP 255 (Washington) Planned Capital Improvement HASR