



**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES

Michael L. Parson  
Governor

Dru Buntin  
Director

ET-32184

September 15, 2022

Alan Tabachnick  
Surface Transportation Board  
395 E. Street SW  
Washington, D.C. 20423

Re: **SHPO Project Number: 038-MLT-22** – Canadian Pacific Railway Acquisition of  
Kansas City Southern Railway (Docket No. FD 36284), (STB)

Dear Alan Tabachnick:

Thank you for submitting information about the above-referenced project for our review pursuant to Section 106 of the National Historic Preservation Act (P.L. 89-665, as amended) and the Advisory Council on Historic Preservation's regulation 36 CFR Part 800, which require identification and evaluation of cultural resources.

Based on the information provided, we were unable to assess the effects of the proposed project on historic properties. In order to aid in the assessment of effects for this project, please address the following comments:

- Provide full addresses when listing historic resources that are being evaluated for the National Register of Historic Places (NRHP). The addresses should include street numbers, designated street names, and the names of towns/cities in which the resources are found. One example of this includes the Mitchell Cemetery (MO-GO-004), which was described as “Along Blackstock Lane” (pg. 126). In order to assist in providing more detailed information, you may choose to complete and include a Cemetery Survey form found at:  
<https://mostateparks.com/sites/mostateparks/files/CemeterySurveyForm.pdf>
- Please include photographs of historic resources in their entirety. Photographs should be taken straight on to include the front façade and angled to include details along elevations of the larger buildings.
  - For example, the photograph for MO-BV-011, which is identified as the Libby Welding Company, is missing images of the related mid-century building at 2201 Manchester Trafficway in Blue Valley.
  - In Jasper County, MO-AS-001 is a farm site with multiple buildings and structures present. Please provide photographs that show the multiple buildings/structures associated with this resource and images that document the landscape. Be sure to assess the property as a rural landscape as well as assessing the individual buildings.



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- Provide detailed maps that not only outline the APE of the proposed work, but also include **clearly identifiable** street names and addresses. Additionally, please include details of where siding will be extended, double tracks will be added, or new siding will be constructed. The report mentions where these improvements will be added, but does not provide drawings or detailed maps to show what these changes will visually look like in the proposed areas.
- Please update the report to include an assessment of 1620 Oakland Avenue in Blue Valley. This historic building was excluded in the report, despite its location within the designated APE.
- Please evaluate the possible noise effects to the historic properties mentioned in the report. This evaluation is necessary for the entirety of the project, but especially in the improvements made that include new siding and the addition of double-tracks. Please include any data that shows if railway traffic will increase/decrease in these areas due to the proposed improvements.
- A segment or railway line does not have to be the first or only example of that transportation type in an area to be considered eligible for the NRHP.
  - For example, with the MP 431/Dawn statement of context the preparer writes that the Canadian Pacific Segment #1 “aided regional commerce and agriculture” and “enabled farmers to travel” but later states that this resource is not eligible because the communities “did not grow markedly following the railroad’s arrival (pg. 84).” Please clarify whether the segment did significantly impact these communities in the areas of Community Planning & Development, Commerce, Transportation, etc.
- When evaluating segments of the railroad for consideration of eligibility to the NRHP, please include an assessment of whether Criterion C would be applicable in the areas of engineering. Criterion C does not solely apply in the area of architecture.

Once we receive this information, we will be able to complete review of your project.

If you have any questions please contact Marie Taylor at (573) 751-5376 or Marie. Taylor@dnr.mo.gov. Please be sure to include the **SHPO Project Number (038-MLT-22)** on all future correspondence relating to this project. If the information is provided via telephone call, please follow up in writing for our files.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

*Toni M. Prawl*

Toni M. Prawl, PhD  
Director and Deputy  
State Historic Preservation Officer