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Subject: R&C 211100058 - STB - Appanoose - Canadian Pacific Railway Limited, et al. (CP) and Kansas City Southern, et al. (KCS) - CP has filed an application with the STB to acquire KCS
Date: Friday, November 18, 2022 3:48:06 PM

We have received your submittal for the above referenced federal undertaking. We provide the following response in accordance with Section 106 of the National Historic Preservation Act of 1966 and its implementing regulations 36 CFR 800.

Regarding this project, please see the following comments:

R&C 211100058 - STB - Appanoose - Canadian Pacific Railway Limited, et al. (CP) and Kansas City Southern, et al. (KCS) - CP has filed an application with the STB to acquire KCS, creating the first railroad to connect Canada, the United States, and Mexico. Part of this undertaking will include the construction of new siding and siding extensions at 8 locations in Iowa, within the railroad right-of-way. See attached project notification letter for greater detail, including a discussion of the APE and a link to the project website: <https://www.cp-kcsmergereis.com/>. A .kmz file with the APEs has been uploaded to this submittal.

- Concur with the federal agency and/or their designated representative (*No Adverse Effect with Conditions*)
- Based on the submitted information, we agree with the eligibility assessments for all surveyed resources (noted in Comanche, Deer Creek, Letts, Moravia, Ottumwa, Washington, and Turkey River), and a few in Bellevue, with the exception of potentially one or more in the Smith Ferry Road neighborhood (Bellevue – further information below).
- Additionally, we agree with a no adverse effect assessment for the proposed capital projects.
- However, there are a number of needed corrections within all the reports and Iowa Site Inventory Forms (ISIF) and more information needed in the Bellevue area. Because of the corrections/more information needed, we require updated versions before we are able to include them within our inventory;
- **Conditions:**
 - Corrections and/or changes are needed within reports and ISIF for Comanche, Deer Creek, Moravia, Ottumwa, Washington, Bellevue, and Turkey River.
 - Specific comments are included in the digital documents. A link to all the files will be included below.
 - Please note that all changes, etc. should be reflected in both the Report and ISIF as is relevant.
 - Regarding the information provided for Bellevue: At this time we are unable to concur with the eligibility assessment for the IA-BV-005, which we'll refer to as the potentially eligible Smith Ferry Road Historic District (HD). The outcome of that re-evaluation, may result in the need to re-evaluate all individual resources within that potential HD.

- We agree that the potential HD is not eligible under Criterion C, however, further research and evaluation under Criterion A is required. As presented, a justification for ineligibility for the potential HD under A has not been provided. Specific comments are found within the text of the report.
- If after re-evaluation, a change to eligibility is made, this would then require the individual properties found within the boundaries to be evaluated as either contributing or non-contributing.
- Regardless of the outcome of the re-evaluation of the Smith Ferry Road section in Bellevue, SHPO still concurs with a no adverse effect. However, documentation regarding resources needs to be complete.
- Regarding archaeology, Daniel Higginbottom reviewed the revisions provided by Bear Creek Archaeology and finds them complete.
- The annotated reports/ISIFs which require changes, etc. can be found here:
https://drive.google.com/drive/folders/1vNpxqJ2gP4v50xrameHRh6q_5N9VJKLd?usp=share_link
 - This link will be disabled after 60 days. Please contact me directly if there are access problems.
- When the reports and ISIFs are updated, they will need to be submitted through ESHPO.

You will not receive a hard copy of this email. It is the submitter's responsibility to maintain the official file of record. If you have any questions or comments, please feel free to contact our office.

Kind regards,

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Iowa Arts Council | Produce Iowa | State Historical Society of Iowa

Iowa Department of Cultural Affairs 