



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

November 24, 2021

Kathryn Kusske Floyd
Venable, LLP
600 Massachusetts Avenue, NW
Washington, D.C. 20001

Re: Docket No. FD 36500, Canadian Pacific Railway Limited, et al.—
Control—Kansas City Southern, et al.; **Information Request No. 2**

Dear Ms. Floyd:

Consistent with 40 C.F.R. § 1506.5(b)(1), the Surface Transportation Board's (Board) Office of Environmental Analysis requests the following information, which is needed to support the environmental review in connection with the above-referenced proceeding:

A. Locomotives, Consists, and Track

1. For rail line segments where the Board's thresholds for environmental analysis would be exceeded, provide estimates of the average number of locomotives per train, the average number of railcars per trains, and the average total length (in feet) of trains pre- and post-acquisition.
2. Provide pre- and post-acquisition average speed on rail line segments where thresholds would be exceeded.
3. Provide the proportion of locomotives in each EPA emissions tier for segments where thresholds would be exceeded.
4. Provide GIS data showing locations of special trackwork (e.g., turnouts, crossovers, track crossings, etc.) on segments where thresholds would be exceeded and identifying segments that use rail types other than continuous-welded rail.
5. Provide the estimated average pre-acquisition and expected average post-acquisition dwell time for passing sidings on segments where thresholds would be exceeded.

B. Rail Yards

1. For the four rail yards that would exceed thresholds for environmental review, provide the estimated pre- and post-acquisition daily switch engine operating hours.
2. Provide the number of rail cars switched per hour of switch engine operation pre- and post-acquisition that would be representative for the four yards that would exceed thresholds (e.g., 20 rail cars switched per switch engine-hour pre-acquisition and 24 rail cars switched per switch engine-hour post-acquisition).
3. Provide switch engine EPA tiers and average fuel efficiency (gal/hour), pre- and post-acquisition for the four rail yards that would exceed thresholds.
4. For the four rail yards that would exceed thresholds, provide the following information, which will be used to estimate the emissions from line-haul locations that perform block swapping:
 - i. Locations of specific rail line segments associated with the rail yard for block swapping.
 - ii. Gross tonnage (average daily or yearly) hauled on the rail line segments pre- and post-acquisition.
 - iii. Length of rail line segments.
 - iv. Gross tonnage hauled per day during block swapping in yard pre- and post- acquisition.
5. Identify which of the rail yards that would exceed thresholds use wheel retarders, if any.

C. Capital Improvements

1. Provide the following information regarding the construction and use of capital improvements, to the extent available:
 - i. The side of the mainline on which each capital improvement would be constructed, if known.
 - ii. The width of the existing right-of-way and the expected post-acquisition right-of-way at each planned capital improvement location.
 - iii. The extent of the expected temporary construction footprint for capital improvements, if different from the expected footprint of the new track planned for the capital improvements.
 - iv. The design of necessary water crossings, including whether bridges or culverts would be used and whether bridges would be clear span or would include columns within waters of the U.S.
 - v. The expected train speed on the planned double track and facility working track.

2. Confirm that CP and KCS (Applicants) intend to access construction locations associated with capital improvements using the existing rail right-of-way and existing roads and road crossings.
3. Confirm that Applicants intend to confine construction activities, including equipment staging and laydown areas, to the existing rail right-of-way.

D. Intermodal Facilities

1. Identify any intermodal facilities that would experience an increase in truck traffic of at least 50 trucks per day or a 10 percent increase or more in average daily truck traffic as a result of the proposed acquisition.
2. For each intermodal facility that would exceed the thresholds above, provide the following information. The information can be provided in table format as shown in the attached template. The intermodal activity levels should be based on projections five years after the date of the anticipated year of the issuance of a final decision from the Board with and without the proposed transaction:
 - i. Railroad (e.g., CP or KCS)
 - ii. Intermodal facility name (including U.S. state)
 - iii. Origin/destination lifts per day
 - iv. Switch lifts per day
 - v. Hazardous material container lifts per day
 - vi. Over the road trucks per day

E. Hazardous Materials

1. Provide a summary of the types of hazardous materials transported on the CP and KCS networks pre-acquisition and on the combined network post-acquisition.
2. Provide records of hazardous materials releases and derailment and accident/incident frequencies for the years 2015 through 2019.

Please provide your response as soon as possible and no later than **December 20, 2021**. If you have any questions, please feel free to contact me at 202-245-0300 or Joshua Wayland at 202-245-0330. Thank you for your assistance in this matter.

Sincerely,



Danielle Gosselin
Acting Director
Office of Environmental Analysis

