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November 13, 2026

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Danielle Gosselin
Director
Office of Environmental Analysis
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Re: Docket No. FD 36873 (sub-no. 47) – Union Pacific Corp. & Union Pacific R.R. – Control – Norfolk Southern Corp. & Norfolk Southern Ry. – CPKC Responsive Application (Mexico, MO–St. Louis Trackage Rights)

Dear Ms. Gosselin:

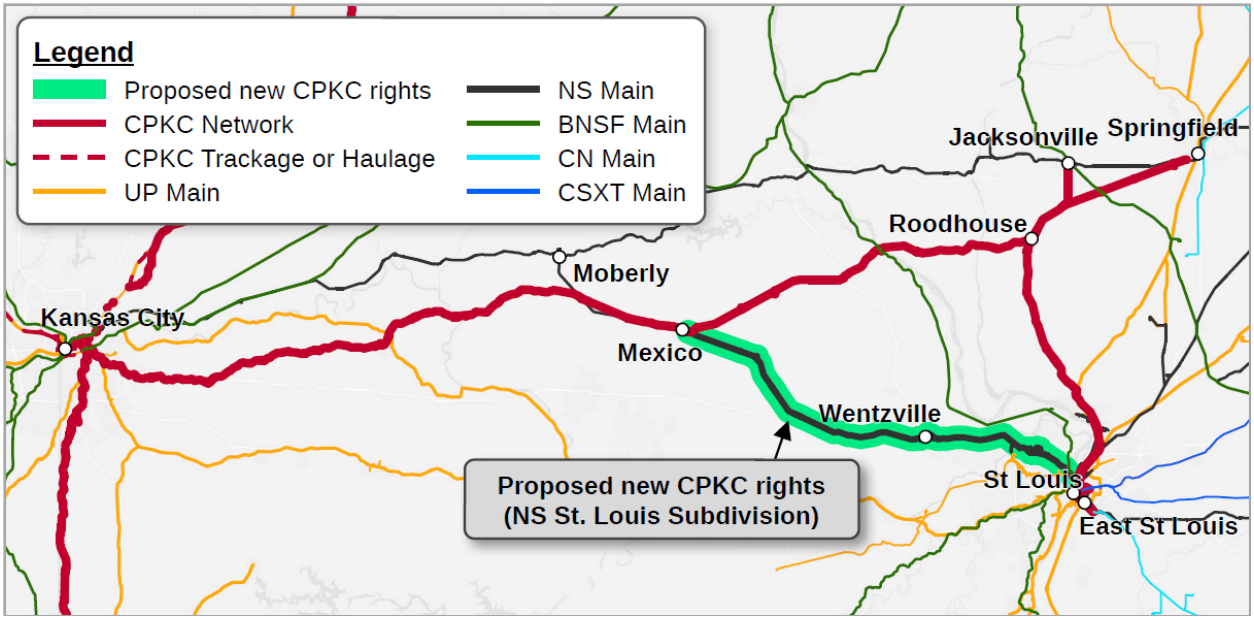
Canadian Pacific Railway Company, d/b/a Canadian Pacific Kansas City, on behalf of itself and The Kansas City Southern Railway Company (collectively, CPKC), submits to the Surface Transportation Board's Office of Environmental Analysis this environmental information for CPKC's Responsive Application addressing trackage rights between Mexico, MO and St. Louis, which CPKC will file on November 18, 2026 in Docket No. FD 36873 (sub-no. 47).

Relief Sought

The relief CPKC seeks in the Mexico, MO–St. Louis Responsive Application would be necessary only if the Board approves the underlying UP-NS merger—which CPKC urges the Board not to do. For reasons CPKC has explained and will continue to explain in its merits-docket filings, the UP-NS merger is not in the public interest and the Board should deny it. If the Board concludes otherwise, it should mitigate the merger's anticompetitive effects by imposing the conditions proposed in CPKC's Mexico, MO–St. Louis Responsive Application.

If the merger is approved, the Mexico, MO–St. Louis Responsive Application will ask the Board to condition any approval on a grant of overhead and local trackage rights over NS's line between Mexico, MO and the Terminal Railroad Association of St. Louis (TRRA) connection in St. Louis, covering portions of NS's Midwest Division, Kansas City District, and St. Louis Terminal Subdivision. These

would include authority to serve the General Motors facility at Wentzville, MO and other on-line shippers, plus incidental yard, switching, and interchange rights. A map illustrating this request appears below:



No Environmental Documentation Required

Acquiring trackage rights under 49 U.S.C. § 11323(a)(6) normally requires no environmental documentation under 49 C.F.R. § 1105.6(c)(3), which excludes "[c]ommon use of rail terminals and *trackage rights*" from environmental review. (Emphasis added.) Because the Mexico, MO–St. Louis Responsive Application seeks only trackage rights, § 1105.6(c)(3)'s rule excusing preparation of environmental documentation applies here.

No Extraordinary Circumstances

The Mexico, MO–St. Louis Responsive Application presents no extraordinary circumstances that would likely have reasonably foreseeable significant adverse effects. As discussed below, the requested relief would result in only a moderate traffic increase, and any minor effects of additional traffic or operational changes would be offset by shorter rerouting for CPKC. In fact, the requested relief could provide environmental benefits as a result of shifting CPKC traffic to a shorter route. The trackage rights requested in the Mexico, MO–St. Louis Responsive

Application thus would not likely result in reasonably foreseeable significant adverse effects.

Traffic Effects

CPKC anticipates that the trackage rights it is requesting in the Mexico, MO–St. Louis Responsive Application would add approximately four-to-six trains per day to the NS Mexico–St. Louis line, with some potential for CSXT run-through trains. Applicants show traffic on the NS St. Louis Subdivision between Moberly and St. Louis at 10.27 trains per day in Year 5 without the merger, plus 1.56 merger-related trains per day (EI-34224, Segment 10206). The rerouting would also produce an offsetting reduction in CPKC trains on the Roodhouse route.

Yard Effects

Local customers on the line would be served through NS reciprocal switching via NS's Wentzville Yard and Luther Yard (St. Louis). This traffic already moves through those NS yards today; under the requested rights in the Mexico, MO–St. Louis Responsive Application, it would simply move in CPKC's account rather than NS's. Projected new traffic from Wentzville and west-of-Wentzville shipper access is modest.

Operating Plan and Supporting Evidence

CPKC will file an operating plan and verified statement with the Mexico, MO–St. Louis Responsive Application on November 18, 2026. Those materials, which are still being finalized, will provide additional support for the operational facts discussed in this letter, and CPKC incorporates them by reference. If the final Responsive Application is materially different from what is described in this letter, CPKC will supplement its submission to OEA.

* * *

For the reasons discussed above, the Mexico, MO–St. Louis Responsive Application should not require environmental documentation under 49 C.F.R. § 1105.6(c).

As always, we are happy to discuss these issues with you, so please contact me if you have any questions or need any additional information.

Sincerely,



Jay C. Johnson

cc: Elizabeth Webster
Joe Van Humbeck
Glen Wilson
Alan Summerville
Waymon Peer