



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

November 3, 2022

Dru Buntin
Director, SHPO
Missouri Department of Natural Resources
1101 Riverside Drive
PO box 176
Jefferson City, MO 65102-0176

Re: FD 36500 (Sub-No. 1), Illinois Central Railroad Company – Acquisition of a Line of Railroad Between Kansas City, Mo., and Springfield and East St. Louis, Ill. – Kansas City Southern Railway Company; **Request for Comments**

Dear Mr. Buntin:

The Surface Transportation Board's (Board) Office of Environmental Analysis (OEA) is initiating consultation under Section 106 of the National Historic Preservation Act (NHPA) for a proposal by Canadian National Railway Company and its affiliate, Illinois Central Railway Company (collectively, CN) that would involve the addition of new railroad tracks within existing rail rights-of-way (ROW) and in rail yards and intermodal facilities in Missouri and Illinois. This letter requests your preliminary comments on the proposed undertaking and OEA's planned Section 106 approach.

Description of the Proposed Undertaking

On June 9, 2022, CN filed an amended "responsive" application in Docket No. FD 36500 (Sub-No. 1) requesting that the Board order the sale of the Kansas City Southern Railway (KCS) rail line between Kansas City, Missouri and Springfield and East St. Louis, Illinois (Springfield Line) to CN (Proposed Divestiture). See attached maps. CN's filing was submitted in response to a primary application filed jointly by KCS and Canadian Pacific Railway (CP) in Docket No. FD 36500, seeking Board authority for CP to acquire KCS.¹ The proposed acquisition of KCS by CP is the subject of a separate ongoing Section 106 review.² Should the Board authorize both

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² The Board issued a Draft Environmental Impact Statement (EIS) on the primary application in Docket No. FD 36500 on August 5, 2022, addressing both Section 106 and environmental issues, and requested public comments on the Draft EIS by October 14, 2022. Section 3.9, *Cultural Resources* in the Draft EIS discusses potential effects of the proposed acquisition of KCS by CP on historic properties. More information regarding the Section 106

the primary application and the Proposed Divestiture, then CP would be ordered to sell the Springfield Line to CN upon completion of CP's acquisition of KCS.

Before deciding whether to authorize the Proposed Divestiture, the Board must first assess the potential effects of CN's proposal on historic properties listed on or eligible for listing on the National Register of Historic Place (National Register) in accordance with Section 106 and the Board's Section 106 regulations at 49 C.F.R. § 1105.8. OEA will conduct the Section 106 review of the Proposed Divestiture separately from, but concurrently with, the ongoing Section 106 review of the proposed acquisition of KCS by CP. Although the Proposed Divestiture could only occur if CP is authorized to acquire KCS, the Section 106 reviews for the two proposals are being conducted separately because they involve different railroad applicants and largely distinct sets of potential effects that would occur in different geographic areas.

The purpose of this letter is to advise you of the Proposed Divestiture and request information from your agency on the cultural resources under your jurisdiction that could be affected by the Proposed Divestiture. The Section 106 review of the Proposed Divestiture will help inform the Board in making its decision about whether to approve CN's proposal and, if so, whether and what mitigation conditions to impose.

Project Description

The Proposed Divestiture proceeding requests that the Board order the sale of approximately 370 miles of KCS's Springfield Line in Missouri and Illinois. In connection with the sale of the Springfield Line, CN also seeks a 50% equity interest in KCS's International Freight Gateway terminal (IFG Terminal) south of Kansas City. See attached maps. CN states that the Proposed Divestiture would preserve and enhance competition between Kansas City and Chicago; introduce new single-line rail automotive and intermodal service between Michigan/Eastern Canada and Kansas City; and establish a more direct route for rail traffic between Canada and the Midwest and East St. Louis. CN estimates that more than 80,000 long-haul trucks would be removed from the highways each year as a result of the Proposed Divestiture and that this would generate public benefits by reducing greenhouse gas emissions, highway congestion and maintenance.

According to CN, the Proposed Divestiture would involve operational changes (e.g., an increase in average trains per day) on certain segments of the Springfield Line, as well as some contiguous segments of rail line owned by CN, and changes in the level of activity at some rail yards and intermodal facilities. To support the projected increases in rail traffic, CN plans to make eleven capital improvements within the existing rail ROW. See attached maps. These would include extending six existing passing sidings, adding one new siding passing, and relocating one passing siding on the Springfield Line. In Missouri, sidings would be added or extended at Grain Valley, Harmony, Mexico West, Bowling Green, and Blackburn. In Illinois, sidings would be added or extended at Pleasant Hill, Roodhouse and Cockrell. In addition, CN

review of the proposed acquisition can be found on the Board-sponsored project website (www.CP-KCSMergerEIS.com) or on the Board's website at www.stb.gov by conducting a search for Docket No. FD 36500.

plans to make capital improvements at the East St. Louis Yard/Intermodal Terminal in Illinois by constructing 6,000 feet of track with intermodal pads and accompanying pavement and 5,000 feet of track for loading/unloading and car storage; and developing approximately 25 acres of land for necessary roadways, parking, and truck areas. At IFG Terminal in Missouri, CN proposes to construct 20,000 feet of track with pad, storage and accompanying pavement, and 6,600 feet of track for loading/unloading and storage, roadways and railhead parking and truck areas. At Roodhouse Yard in Illinois, CN would construct 5,000 feet of new yard track.

Consistent with past practice in railroad acquisition cases, OEA will focus the Section 106 review on the eleven capital improvements that CN would undertake if the Board authorizes the Proposed Divestiture because those projects are the only components of the Proposed Divestiture that could have the potential to affect cultural resources.

Area of Potential Effects

The area of potential effects (APE) for historic properties will be defined in accordance with 36 C.F.R. Part 800, 49 C.F.R. § 1105.8, and precedent established in previous railroad acquisition proceedings. OEA expects that the APE for the Proposed Divestiture will comprise eleven discontinuous areas corresponding to the eleven locations set forth above where capital improvements are planned. Each component area of the APE will extend the length of the planned capital improvement and will extend the width of the rail ROW to encompass the entire area within which ground disturbing activities could potentially occur. In addition, OEA proposes to add a 500-foot buffer to each component area of the APE (250 feet on either side of the right-of-way and 250 feet at each end) to account for potential setting, visual, noise, or other impacts from construction activities related to the planned capital improvement. Based on the information available to date, OEA anticipates that all of the construction activity would take place within the existing ROW and may be in previously disturbed areas. The APE will be further refined as additional information about the Proposed Divestiture and its potential to affect cultural resources becomes available.

Request for Comments

We appreciate your assistance in identifying whether any cultural resources of concern to your agency may be affected by the Proposed Divestiture and welcome any additional issues or concerns that you consider appropriate. To submit comments electronically through the Board's website at <https://www.stb.gov>, select "File an Environmental Comment" below the "Need Assistance?" button. Be sure to include the docket number "Docket No. FD 36500 (Sub-No. 1)." Log-in accounts are not needed to file Section 106 comments electronically, and brief comments can be typed in the comment field, and lengthier comments can be attached as Word, Adobe Acrobat, or other file formats.

Alternatively, comments submitted by mail should be addressed to: Alan Tabachnick, Historic Preservation Specialist and Deputy Federal Preservation Officer Surface Transportation Board, 395 E Street SW, Washington, DC 20423-0001, Attention: Environmental Filing, Docket No. FD 36500 (Sub-No. 1). You may also submit comments to OEA's third-party consultant Burns & McDonnell at:

Alan Tabachnick
c/o Stephen Thornhill
Burns & McDonnell
9400 Ward Parkway
Kansas City, MO 64114

If you have any questions, please feel free to contact Alan Tabachnick of my staff, at 202-245-0367 or by email at alan.tabachnick@stb.gov. **Please send your responses by December 9, 2022.**

Sincerely,

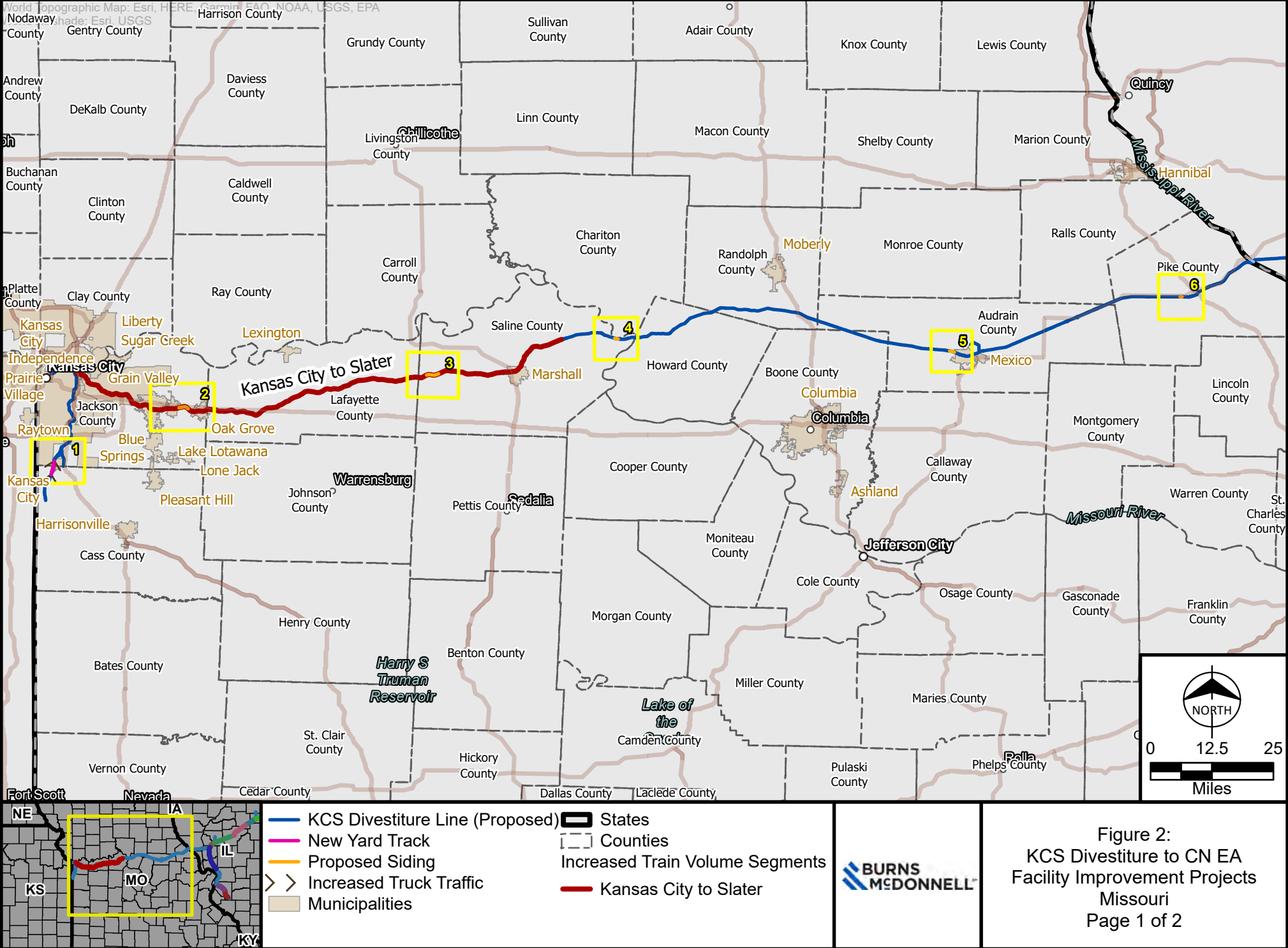
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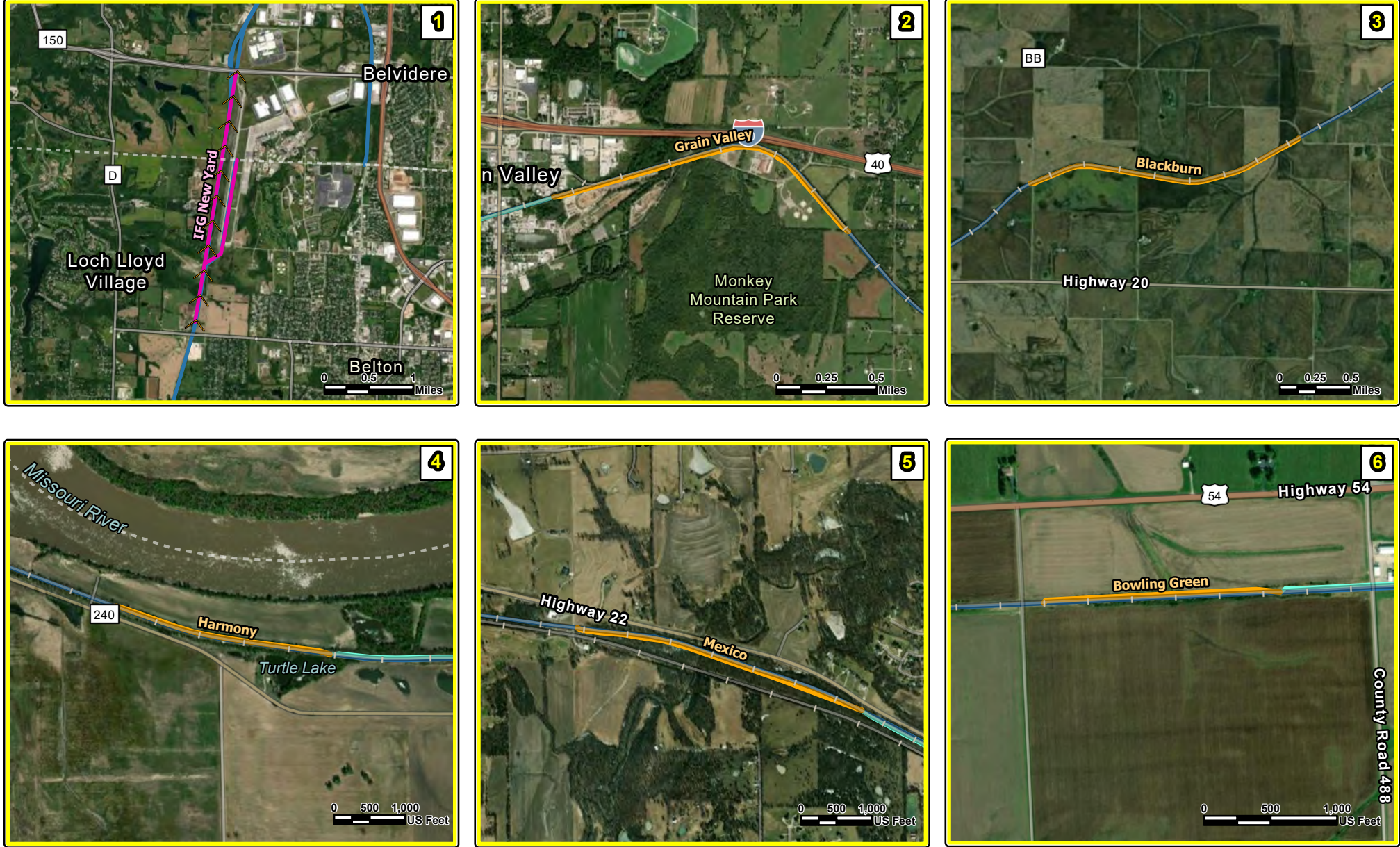
Danielle Gosselin
Director
Office of Environmental Analysis

Map Attachments



Figure 1:
KCS Divestiture to CN
Line Segments and
Facility Improvement Projects
for EA Evaluation





- KCS Divestiture Line (Proposed)
- Proposed Siding
- Existing Siding
- New Yard Track
- Increased Carload Switching Activities
- > > Increased Truck Traffic



BURNS
MCDONNELL

Figure 2:
KCS Divestiture to CN EA
Facility Improvement Projects
Missouri
Page 2 of 2



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

November 3, 2022

Colleen Callanhan
Director, SHPO
Illinois Department of Natural Resources
1 Natural Resources Way
Springfield, IL 62702-1271

Re: FD 36500 (Sub-No. 1), Illinois Central Railroad Company – Acquisition of a Line of Railroad Between Kansas City, Mo., and Springfield and East St. Louis, Ill. – Kansas City Southern Railway Company; **Request for Comments**

Dear Ms. Callanhan:

The Surface Transportation Board's (Board) Office of Environmental Analysis (OEA) is initiating consultation under Section 106 of the National Historic Preservation Act (NHPA) for a proposal by Canadian National Railway Company and its affiliate, Illinois Central Railway Company (collectively, CN) that would involve the addition of new railroad tracks within existing rail rights-of-way (ROW) and in rail yards and intermodal facilities in Missouri and Illinois. This letter requests your preliminary comments on the proposed undertaking and OEA's planned Section 106 approach.

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the primary application and the Proposed Divestiture, then CP would be ordered to sell the Springfield Line to CN upon completion of CP's acquisition of KCS.

Before deciding whether to authorize the Proposed Divestiture, the Board must first assess the potential effects of CN's proposal on historic properties listed on or eligible for listing on the National Register of Historic Place (National Register) in accordance with Section 106 and the Board's Section 106 regulations at 49 C.F.R. § 1105.8. OEA will conduct the Section 106 review of the Proposed Divestiture separately from, but concurrently with, the ongoing Section 106 review of the proposed acquisition of KCS by CP. Although the Proposed Divestiture could only occur if CP is authorized to acquire KCS, the Section 106 reviews for the two proposals are being conducted separately because they involve different railroad applicants and largely distinct sets of potential effects that would occur in different geographic areas.

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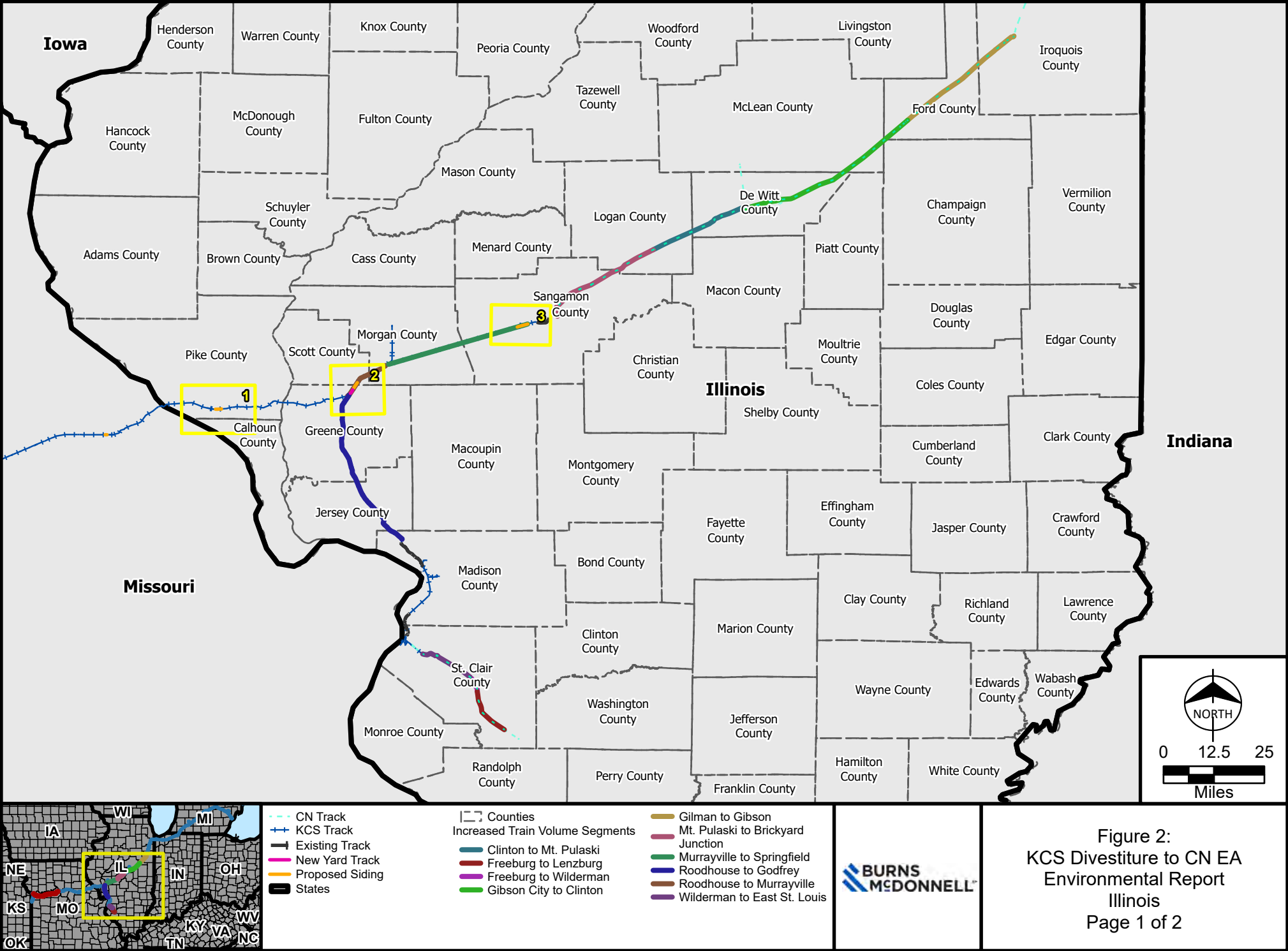
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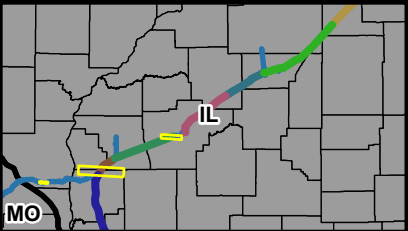
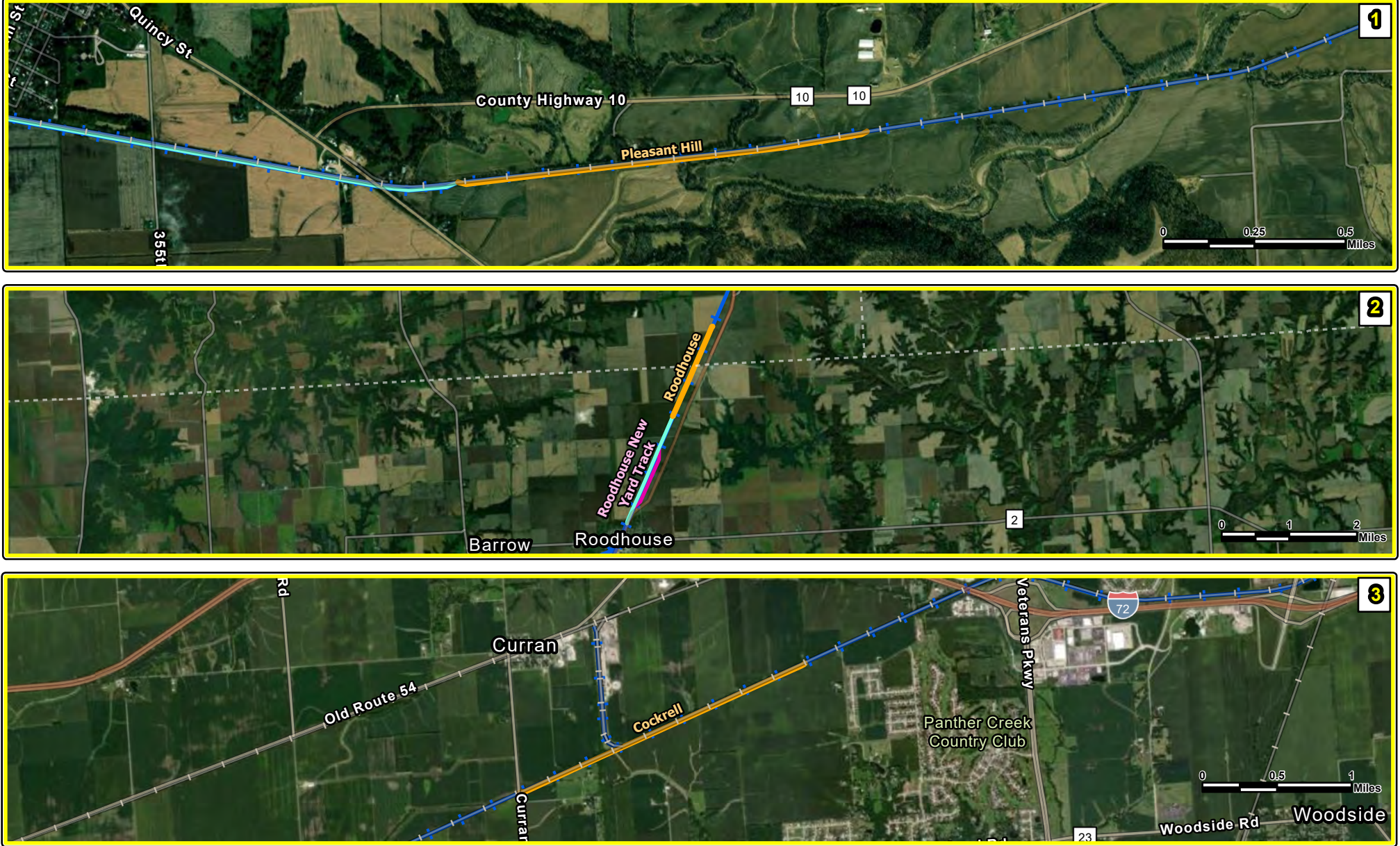
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- Proposed Siding
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Figure 2:
KCS Divestiture to CN EA
Facility Improvement Projects
Illinois
Page 2 of 2



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

November 3, 2022

Martha MacFarlane-Faes
Deputy SHPO
Michigan Economic Development Corporation
300 N. Washington Sq.
Lansing, MI 48913

Re: FD 36500 (Sub-No. 1), Illinois Central Railroad Company – Acquisition of a Line of Railroad Between Kansas City, Mo., and Springfield and East St. Louis, Ill. – Kansas City Southern Railway Company; **Request for Comments**

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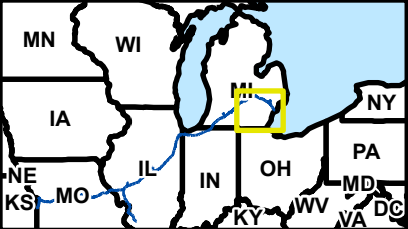
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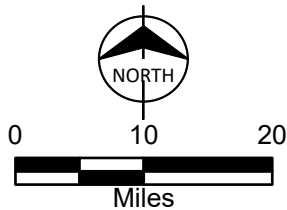
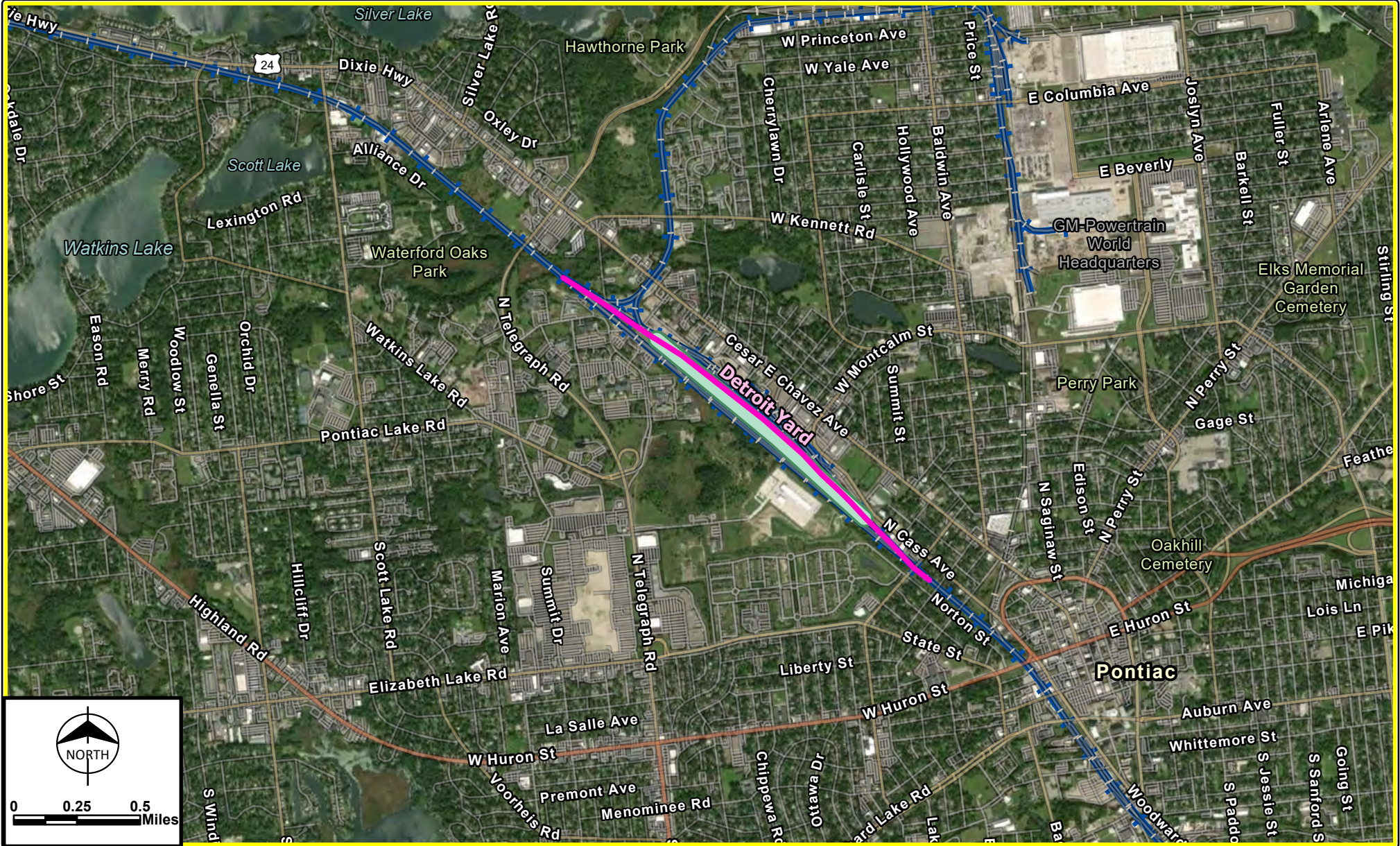


Figure 2:
KCS Divestiture to CN
Facility Improvement Projects
for EA Evaluation
Michigan (Overview)
Page 1 of 2



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Existing Rail Line

Rail Yard With Increased Carload Switching Activities

Yard Tack



Figure 2:

KCS Divestiture to CN EA

Facility Improvement Project

Detroit Intermodal Yard

Michigan

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