



SIDLEY AUSTIN LLP
1501 K STREET, N.W.
WASHINGTON, D.C. 20005
+1 202 736 8000
+1 202 736 8711 FAX

AMERICA • ASIA PACIFIC • EUROPE

+1 202 736 8531
PWHITFIELD@SIDLEY.COM

January 13, 2023

By E-Mail

Danielle C. Gosselin
Director, Office of Environmental Analysis
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423

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, IL – Kansas City Southern Railway Company et al;
Response to Information Request No. 2

Dear Ms. Gosselin:

On behalf of the Illinois Central Railroad Company (CN), we submit the following in response to your December 21, 2022 request for additional information in connection with the proposed divestiture of the Kansas City Southern Railway Company (KCS) rail line between Kansas City, Missouri, and Springfield and East St. Louis, Illinois, by CN (Proposed Divestiture) in the above referenced proceeding.

For ease of review, we have included the text of each information request with our response following.

A. For rail segments on the Springfield Line, where the Board's thresholds for environmental analysis would be exceeded, please provide:

A.1. The average locomotive fuel efficiency (ton-miles per gallon of diesel fuel) for pre-and post-divestiture (No-Action and Action Alternatives) operations.

CN Response: The average locomotive fuel efficiency is not dependent on the rail segment. The CP-KCS control application in FD 36500 indicates that KCS's pre-divestiture locomotive fuel efficiency is 806 gross ton-miles per gallon of diesel fuel, based on 2020 data. CP-28/KCS-16, App. Vol. 4, pg. 561. CN's post-divestiture locomotive fuel efficiency is estimated to be 1,153 gross ton-miles per gallon of diesel fuel, based on 2021 data.

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- A.2. The average number of locomotives per train, the average number of railcars per train, and the average total length (in feet) of trains, pre-divestiture (No-Action Alternative).

CN Response: CN does not possess information regarding KCS pre-divestiture average number of locomotives per train on the Springfield Line. CN's estimate of the pre-divestiture average number of railcars per train and the average total length (in feet) of trains on the rail segments of the Springfield Line that exceed the Board's environmental analysis thresholds are presented in the table below. Because pre-divestiture KCS local trains on these segments were abnormally short, this data is presented both with and without the KCS local trains.

PRE-DIVESTITURE

Segment	Trains per day (w/locals)	Trains per day (w/o locals)	Railcars per train (w/locals)	Railcars per train (w/o locals)	Length (ft.) per train (w/locals)	Length (ft.) per train (w/o locals)
Murrayville, IL – Cockrell, IL	0.3	0	6	n/a	360	n/a
Roodhouse, IL – Murrayville, IL	1.7	0.9	57	105	3,190	5,830
Kansas City, MO (Airline Jct) – Slater, MO	2.9	2.4	91	110	5,292	6,384
Roodhouse, IL – Godfrey, IL	1.6	1.2	81	108	4,917	6,619

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- A.3. The estimated average pre-divestiture (No-Action Alternative) and expected average post-divestiture (Action Alternative) dwell time at passing sidings.

CN Response: CN does not have sufficient data from KCS to determine KCS dwell times, or specific conditions of the track and track speed (consistent and upgraded track is assumed in the post-transaction scenario).

Estimated post-divestiture dwell times at passing sidings are presented below. These times are estimates and can only be refined once CN takes possession of the track, is able to obtain its exact engineering attributes, implements its investment plans, and gains a deeper understanding of operating conditions.

CN notes that planned investments in new, relocated or extended sidings to provide service for the estimated increase of rail traffic on the Springfield Line should largely eliminate any need to block grade crossings when holding trains at these locations.

POST-DIVESTITURE PASSING SIDINGS

Mile-posts	Location Name (Segment)	Post-Transaction Description	Average Dwell Minutes Per Day	Notes
192.4 – 194.5	Cockrell, IL (Murrayville-Cockrell)	New 10,000 ft siding No grade crossings	60	Supports train meets, staging to/from NS/UP segment, and service to ADM facility. Assumes Kansas City-Chicago train waits every day at Cockrell due to dispatch delay onto NS/UP segment.
233.2 – 236.6	Roodhouse, IL (Roodhouse-Murrayville)	Siding extension Extends existing siding by 8,400 feet. Siding will be clear of all grade crossings between MP 233.2 and 235.2.	257	Occupancy includes usage for block swaps and some delays due to bridge openings across the Illinois River. 28 train events (primarily block swaps) and 2 meets for bridge openings.

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Mile-posts	Location Name (Segment)	Post-Transaction Description	Average Dwell Minutes Per Day	Notes
		1 crossing on existing siding will remain.		
417.3 – 419.3	Blackburn, MO (Airline Jct.-Slater)	Relocated 10,000 ft siding No grade crossings on relocated siding.	64	Moves siding out of town, eliminating potential to block crossings (2 crossings on existing siding)
447.1 – 448.3	Odessa, MO (Airline Jct.-Slater)	Existing 5,600 ft siding No divestiture-related modifications.	0	CN does not plan to use as part of main dispatching process. Some local switching/car storage may occur on siding.
460.8 – 463.9	Grain Valley, MO (Airline Jct.-Slater)	Extends existing siding by 8,900 feet. Siding will be clear of all grade crossings between MP 462.8 and 460.8. 2 crossings on existing siding will remain.	134	75 minute estimate for meet dwell time, 60 minute estimate for dispatch delay, evenly distributed.
36.8 – 38.3	Delhi, IL [Sherman] (Roodhouse-Godfrey)	Existing 7,405 ft siding No divestiture-related improvements. 1 existing crossing.	60	Assumes long East St Louis-bound train waits every day at Sherman due to dispatch delay onto UP joint segment.

- B. At rail yards on the Springfield Line that would exceed the Board's thresholds, please provide the total number of pre-divestiture and post-divestiture (No-Action and Action Alternatives) rail cars switched per year.

CN Response: The information provided below is taken from pages 82–84 of CN's Operating Plan included as Exhibit 13 to its Amended Responsive Application, CN-18 (filed June 9, 2022). The East St. Louis information differs depending on whether it is derived from CP-KCS's "calibration" methodology or CN's Full Waybill Methodology.

CHANGES IN RAIL YARD ACTIVITY

LOCATION	Pre-Divestiture Total Equivalent Cars Handled	Post-Divestiture Total Equivalent Cars Handled
East St. Louis, IL ¹	58874.5	83402.5
East St. Louis, IL ²	45406	69934
International Freight Gateway Grandview, MO	35770	74277.5
Roodhouse, IL	3905.5	9453.5

- C. For all planned capital improvements, please provide the following construction data:

- C.1. Construction schedule (timeframe in months/years from start to completion);

CN Response: Once construction commences, we assume completion for sidings within 8–12 months and completion for the intermodal/automotive facilities within 12–

¹ The car handling numbers in this row are based on the CN Full Waybill Methodology as described at pages 34 and 35, Figure 27A, of the Responsive Application Operating Plan (filed June 9, 2022). As described in that Operating Plan and CN's multiple filings on this point, CN believes that these numbers are more accurate than the "calibrated" numbers in the CP-KCS operating plan as CN relied on and examined the full year 2019 waybill file in cross-checking OEA Density Data as well as full year 2019 traffic from Multirail. See FD 36500, CN-16, 304321 (filed April 18, 2022) (Second Verified Statement of Carl Van Dyke).

² The car handling numbers in this row are based on the "calibration" methodology numbers that CP and KCS used in the May 2022 version of their operating plan, as described at pages 34 and 35, Figure 27B, of the Responsive Application Operating Plan (filed June 9, 2022). This methodology relied on CP-KCS's calculations of the 2019 base year trains per day using snapshots from three different years: one-month periods in 2020 and 2019 and operating plan data from the 1st quarter of 2021. See also FD 36500, CN-16, 304321 (filed April 18, 2022). This approach does not accurately reflect daily trains from the 2019 base year. *Id.*

24 months. However, construction may be delayed for various reasons including weather, permitting, and work windows.

C.2. Duration of workdays (hours) and work week (days);

CN Response: Workdays are assumed to be 10–12 hours, but may extend during summer months due to favorable conditions and longer periods of daylight. A work week is assumed to be at least five (5) days (i.e., Monday–Friday). Construction delays, such as those caused by weather, may lead to an extended work week (i.e., Saturday and Sunday in addition to or as an alternative to Monday–Friday).

C.3. List of construction equipment and truck types to be used;

CN Response: It is not known at this time the exact equipment, or number thereof, that would be used during construction. However, CN anticipates using the following typical equipment for site preparation activities: dump trucks, excavators, rollers/compactors, grading equipment, concrete trucks, pickup trucks, and offroad large trucks for hauling large amounts of dirt. The number and type of equipment vary by project. For sidings, CN generally anticipates using between two (2) and four (4) of each type of necessary equipment. For the new intermodal facility, CN generally anticipates using between four (4) and eight (8) of each type of necessary equipment.

For infrastructure construction, CN anticipates using the equipment and trucks typically used in such construction. At this time, CN generally anticipates the following: between one (1) and two (2) speed swings, between two (2) and four (4) backhoes, hundreds of ballast cars (or dump trucks), two (2) tampers, two (2) ballast regulators, one (1) stabilizer, three (3) welding trucks, two (2) rail heaters, between one (1) and two (2) cranes, two (2) backhoes, and three (3) asphalt or concrete paving machines (depending on what material is decided for the intermodal/automotive terminals).

C.4. Number of each piece of construction equipment and truck type to be used;

CN Response: *See infra* CN Response to C.3.

- C.5. Total working days or hours that each piece of construction equipment and truck type would be in operation;

CN Response: This will depend on project schedule, any applicable permit conditions, equipment availability, final design parameters, and the final construction schedule, among other factors.

- C.6. Provide width of existing right-of-way and anticipated width of area of disturbance at each construction location;

CN Response: CN has not had access to the KCS Springfield Line. CN believes the width of the existing right-of-way at each of the construction locations is as indicated below, based on available GIS data. The anticipated area of disturbance at each location will be within the existing right-of-way.

Cockrell New Siding: 100–130 feet
Roodhouse Siding Extension: 75 feet
Roodhouse New Yard Track: 225 feet
Pleasant Hill Siding Extension: 100 feet
Bowling Green Siding Extension: 100 feet
Mexico West Siding Extension: 100 feet
Harmony Siding Extension: 145 feet
Blackburn Siding Relocation: 100 feet
Grain Valley Siding Extension: 100–135 feet
East St. Louis Intermodal/Automotive Facility: Within existing yard footprint
International Freight Gateway Intermodal/Automotive Facility: Within existing yard footprint

- C.7. Please describe any capital improvement-related modifications or alterations that would occur at waterway crossings (sidings, yards and intermodal terminals), and indicate the nature and extent of these changes; and

CN Response: CN has not had access to the KCS Springfield Line and, accordingly, has not developed detailed, site-specific engineering plans for its proposed improvements to passing sidings and development of intermodal/automotive terminals. Siding construction, extensions and relocation will take place immediately adjacent to the existing main line track of the Springfield Line and within the existing right-of-way. It is anticipated that existing culverts will be extended to accommodate the second track, and a second bridge will be

constructed in the three known locations where a bridge currently exists on the main line track. No waterway crossings are anticipated at the locations of the East St. Louis and IFG intermodal/automotive facilities.

- C.8. Please identify the number and type of structures (box culvert, bridge – clear span/pier or other) at each of the affected waterway crossings mentioned above.

CN Response: CN anticipates that three short bridges, measuring approximately 130–200 feet, will be constructed—

Mexico West Siding Extension: Davis Creek
Blackburn Siding Relocation: Pass Branch
Grain Valley Siding Extension: Sni-a-Bar Creek

These bridges are expected to be clear-span structures that will not entail the placement of piers within the waterway. Other existing box or pipe culverts will be extended at various locations along the new, relocated or extended passing sidings.

- D. At intermodal facilities, please provide pre-divestiture and post-divestiture (No-Action and Action Alternatives) information on:

- D.1. Average truck dwell time at facility;

CN Response: Consistent with studies relied upon in the Draft Environmental Impact Statement prepared for FD 36500, CN assumes an average truck dwell time of 34 minutes at intermodal facilities. This dwell time is not expected to change from the pre-divestiture period to the post-divestiture period at the Detroit intermodal facility. Only the post-divestiture period is relevant for the new East St. Louis and IFG intermodal facilities, as those facilities do not exist today.

- D.2. Number of operating days per year;

CN Response: CN's Detroit intermodal facility operates 364 days per year (every day except for Christmas). Normal weekday operating hours are 5:00 a.m. to 9:00 p.m. On weekends and certain holidays (New Year's Day, Easter, Fourth of July, Labor Day, Thanksgiving, day after Thanksgiving, Christmas Eve and New Year's Eve), operating hours are generally 7:00 a.m. to 3:00 p.m. This operating schedule is not anticipated to change post-divestiture.

CN anticipates that the new intermodal facilities at East St. Louis and the International Freight Gateway would have similar operating days and schedule as the Detroit facility.

D.3. Number of yard truck moves per lift; and,

CN Response: Consistent with studies relied upon in the Draft Environmental Impact Statement prepared for FD 36500, CN assumes an average of 1.2 yard truck moves per lift at intermodal facilities. This figure is not expected to change from the pre-divestiture period to the post-divestiture period at the Detroit intermodal facility. Only the post-divestiture period is relevant for the new East St. Louis and IFG intermodal facilities, as those facilities do not exist today.

D.4. Number of yard truck moves per hour.

CN Response: Using the number of lifts provided in Figures 35 and 35A of CN's Amended Springfield Operating Plan, and 364 operating days/year and 16 operating hours/day, CN has estimated the following number of yard truck moves per hour:

Detroit Intermodal Facility:

Pre-divestiture: 32.9

Post-divestiture: 43.4

East. St. Louis Intermodal Facility:

Pre-divestiture: n/a

Post-divestiture: 6.1

IFG Intermodal Facility (CN):

Pre-divestiture: n/a

Post-divestiture: 23.3

E. At automotive facilities, please provide pre-divestiture and post-divestiture (No-Action and Action Alternatives) information on:

E.1. Average truck dwell time at facility;

CN Response: The current estimate of average truck dwell time at CN automotive facilities is 90 minutes, but these truck engines are not running (or idling) during this time (i.e., the engines are off during loading and unloading). This dwell time is only relevant for the post-divestiture period, as the East St. Louis and IFG automotive facilities do not exist today.

E.2. Number of operating days per year;

CN Response: CN anticipates operating the new automotive facilities 312 days per year (six days per week).

E.3. Number of yard truck moves per lift; and,

CN Response: CN's proposed automotive facilities do not involve "lifts" or yard truck moves, as automobiles are driven directly onto or off of delivery trucks and autorack railcars via loading and unloading ramps. The air emissions associated with each of these automobile movements is generally minor.

E.4. Number of yard truck moves per hour.

CN Response: Not applicable. *See infra* CN Response to E.3.

F. For truck-to-rail diversions, please provide the expected annual truck-miles removed *by county*.

CN Response: Attachment 1 is an Excel spreadsheet showing, by county, expected annual truck-miles removed due to truck-to-rail diversions. This spreadsheet also shows added truck-miles due to drayage associated with truck-to-rail diversions, along with the net change in truck-miles for each county. The sources and methodology for the analysis are provided in the spreadsheet.

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In the course of preparing this response, CN discovered one error in its prior September 6, 2022 Response to OEA Information Request #1. In Attachment 2 to that Response, Cell P6 (2027 Plan: Cars/Train: Scheduled for the Kansas City MO (Airline Jct.) – Slater MO segment) should be 96 cars/train, rather than 84 cars/train. The second note to that spreadsheet attachment should read:

The scheduled trains from Airline Jct to Slater are the I-CHKC and I-KCCH 7 days a week, and two pure merchandise trains M-VNKC and M-KCVN 6 days a week. Using the 1000 feet = 14.1 cars/day for the I-KCCH/I-CHKC trains, we have the average "I" train on this section has 20.8 multilevel cars and 101 intermodal platforms, or a total of 123 'cars' per run. The merchandise trains M-VNKC and M-KCVN average 65 cars/run. So average cars are $(123 * 7 + 65 * 6) / 13 = 96$ cars/run.

There is no change in cell S6 (7,960), which is the corresponding length (ft.)/train for scheduled trains on the Airline Jct. to Slater segment. If you would like a revised copy of this attachment, please let us know.

We are available for any further discussion or follow up that may be useful with regard to this information.

Best regard,
/s/ Peter Whitfield

Peter Whitfield
Partner

Attachment (1)

cc: Kathryn J. Gainey, CN