



December 15, 2021

Joshua Wayland  
Surface Transportation Board c/o VHB  
Attention: Environmental Filing  
Docket No. FD 36500  
940 Main Campus Dr., Suite 500  
Raleigh, NC 27606

Dear Mr. Wayland:

On behalf our communities, we would like to request that the Surface Transportation Board (STB) delay for sixty (60) additional days the comment period for scoping the Environmental Impact Statement (EIS) related to the acquisition of the Kansas City Southern (KCS) by the Canadian Pacific Railway Limited (CP).

There are several reasons for this request:

- Scoping is a process that defines the range of issues that should be considered in the EIS. The citizens and communities of Iowa just learned of this potential acquisition in November. The increased rail traffic will be very impactful to adjacent citizens and communities. There is a need for adequate time to review any information they believe may be relevant when considering impacts, either negative or beneficial, to all resources, facilities, residences, and businesses within their jurisdiction or purview. Thirty days is not an adequate time to complete review of the 4,000 plus page filing to the docket and considering the breadth and scope of the potential impacts.
- As you have stated in your communications with our communities, the proposed acquisition would involve changes in levels of operations with an increase in average trains per day on certain segments of the combined rail network and changes in activity at some rail yards and intermodal facilities that would exceed the STB thresholds for environmental analysis. You have also stated the thresholds for assessing environmental impacts from increased rail traffic on rail lines in railroad acquisition proceedings are an increase in rail traffic of at least 100 percent and communications by CP representatives with some of our communities have indicated a three-fold increase in traffic in some cases.
- Iowa communities and businesses have made significant recreation, economic, transportation, and quality of life investments, especially along the Mississippi River. The potential impacts to all of these investments, including crossing accessibility for emergency services, must be identified in the scoping process.

This issue is of the utmost importance to our communities. We believe the request for a sixty (60) day extension to the comment period for the scoping of the EIS this approach would best serve our citizens. Thank you for the opportunity to provide these comments.

Sincerely:

Bob Gallagher  
Mayor, City of Bettendorf

Mike Matson  
Mayor, City of Davenport

Diana Broderson  
Mayor, City of Muscatine

Sally Rodriguez  
Mayor, City of Buffalo

Ray Allen  
Mayor, City of LeClaire

Kevin Kernan  
Mayor, City of Princeton