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Denise Bulat

December 30, 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:

The Quad Cities Iowa/Illinois Metropolitan Planning Area (MPA) is located along the Mississippi River at the Eastern Iowa-Western Illinois border. It covers approximately 391.12 square miles. The Metropolitan Planning Organization (MPO) is located within what is known as the Bi-State Region, or service area of Bi-State Regional Commission, including Muscatine and Scott Counties, Iowa and Henry, Mercer, and Rock Island Counties, Illinois. The MPO is responsible for transportation planning for the Quad Cities MPA and is a function of Bi-State Regional Commission. The Quad Cities transportation network vision serves to connect residents and visitors to where they live and work while moving goods/services efficiently and effectively. The 2050 Quad Cities Long Range Transportation Plan has been developed in concert with many stakeholders and technical and elected officials, and through a focused public involvement process. The Quad Cities transportation system provides key infrastructure to support the region's economic vision. The network of streets and highways, rail lines, transit routes, bikeways, sidewalks, runways, and riverways can allow the vision to be achieved or be a hindrance. To be effective, the Quad Cities transportation system needs to balance connectivity, safety, security, efficiency, and sustainability.

The basis of the Quad Cities transportation system rests on goals to "develop a resilient transportation system to provide for the sustainable movement of people and goods" while:

- Cultivating a "diverse, quality-based residential areas for people-friendly, healthful, satisfying living"; and
- Connecting "people to centers for learning, cultural attractions, recreational facilities, and open space to fulfill needs for community well-being, and engage visitors in our amenities"; and
- Creating a "safe, secure, attractive, convenient, equitable, community-based living and working conditions that minimize negative outcomes and provide quality of life benefits for Quad Cities residents."

This balance of livability and functionality in the design of the transportation network has the potential to be severely affected by the proposed acquisition of the Kansas City Southern (KCS) by the Canadian Pacific Railway Limited (CP).

The increased rail traffic will be very impactful to adjacent citizens and communities and all resources, facilities, residences, and businesses within their

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jurisdiction or purview. As stated in your communications with communities in the Bi-State Region, 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. One of the areas of greatest effect, due to the proposed merger, is from Sabula, Iowa to through Muscatine and Scott Counties, Iowa. These increases are noted to be at least 100 percent and as much as three-fold in some cases.

There are regional cultural and recreation facilities, national trail systems, single and multifamily housing, and major businesses located along the alignment and separated from access to services. These facilities have already incurred significant waiting times (beyond required standards), and harmful derailments affecting marginalized populations, among others.

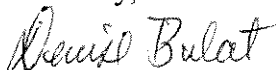
The 2050 Quad Cities Long Range Transportation Plan has many stated objectives in addition to efficient freight movement that require consideration under these circumstances. These include:

- Encourage comprehensive transportation safety solutions through engineering, enforcement, education, and emergency response to reduce traffic fatalities and severe injury crashes, as well as crash frequencies overall; and
- Support programs that ensure safe operation of the transportation system for motorized and nonmotorized users, including adequate safety data for problem identification and analysis
- Seek ways to reduce recurring and non-recurring congestion, and bottlenecks in the transportation network; and
- Promote efficient system management and operation through the use of technology and innovative, context-sensitive solutions; and
- Consider urban design context of the community for culture, diversity, history, aesthetics, and the natural environment in development of transportation facilities; and
- Develop a balanced multi-modal system that enhances the environment and minimizes effects on the quality of the air, land, and water as well as effects to protected groups under Title VI requirements for improved quality of life; and
- Promote early environmental consultation and coordination with resource agencies on planning transportation facilities to identify and develop potential mitigation strategies as part of project development; and
- Support transportation system redundancy to provide alternatives, mobility, and connectivity during emergency situations; and
- Support programs that ensure secure operation of the transportation system for motorized and nonmotorized users, including adequate transportation data useful for emergency response and/or evacuations; and
- Encourage cooperative communications and monitoring systems to observe and react to changing conditions and transportation system hazards, natural or man-made.

The Bi-State Region has 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 and Environmental Impact Statement (EIS) process.

This issue is of the utmost importance to the Bi-State Region. Please consider alternative that mitigate or eliminate the severity of all impacts in the context of people, safety, and the quality of life of the Region. Thank you for the opportunity to provide these comments.

Sincerely,



Denise Bulat
Executive Director
Bi-State Regional Commission