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City of Camanche
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Camanche, Iowa
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October 10, 2022

Surface Transportation Board
Docket No. FD 36500

RE: Canadian Pacific Acquisition of Kansas City Southern Environmental Impact Statement

To Whom It May Concern:

The City of Camanche has grave concerns regarding the impact that the proposed merger of the Canadian Pacific (CP) and Kansas City Southern (KCS) Railroads will have in our community. Since learning of the proposed merger between Canadian Pacific and Kansas City Southern, the City of Camanche has been in negotiations with Canadian Pacific to discuss and negotiate the mitigation of issues that this merger will create in Camanche if it is allowed to occur

Camanche already has challenges with the current nine (9) trains per day. The proposed merger will have real and tangible negative impacts on Camanche and specifically on the residents who live adjacent to the tracks in the heart of our city. There are 7 crossings in Camanche, all within 1 mile of each other. Every crossing in the City abuts to a residential parcel. The City has identified the following negative impacts related to the proposed merger:

AFFECTED AREA

The affected area of the City of Camanche covers a distance along the CP mainline tracks of 1 mile. Within that 1 mile, there are 7 crossings, all of which abut residential. There are two areas of commercial property abutting the crossings. There are additional properties which are industrial including ARTCO and Manatt's Asphalt which have a private crossing.

PUBLIC SAFETY

The increase in train traffic without constructing new overpasses will severely impact the response of ambulance, fire, and police services. Blockages of crossings delay access of emergency services to over 400 households and over 1,200 residents on the easterly side of the tracks. There are frequent blockages when ambulances attempt to answer a call in this area of the City. Delays in response to emergency needs are life and death. Camanche is a population of 4,572. This represents 25% of our citizenry who will have limited access to such services when the crossings are blocked. In the case where all crossings are blocked, these citizens would have no means of egress from the area except for the Mississippi River. This leaves the citizens with no viable option to evacuate or obtain emergency services. In addition, the City of Camanche provides river rescue response to neighboring areas. The typical blockage

of tracks and an inability to provide services due to blockages will only lead to more delays of vital emergency needs. These are compounded by the same issues noted under our Transportation portion above.

TRANSPORTATION (Streets, Parking and Traffic)

The City has previously closed crossings at 6th Avenue and 8th Avenue. The remaining crossings are vital for Camanche residents to have ease of access to traverse to and from their place of residence to their place of employment. Camanche is a bedroom community. More than 60% of those residents are employed outside of Camanche. Nearly all of the residents on the easterly side of the tracks who are employed travel across the tracks to get to work. The City of Camanche has invested over \$1.5M in the last 4 years for street improvements in this area of the community in order to accommodate the travel needs of these residents. Also crossing the tracks at 4th avenue, as well as 3rd Street, is the Mississippi River Trail. This recreational trail designation is an attraction for Camanche. Increased train volume will negatively impact this alternative transportation and recreational route.

In addition, Camanche is in a unique locations where the Canadian Pacific line travels north to Clinton where it intersects with the Union Pacific rail line. The UP line establishes dominance over traffic causing CP to stop in Camanche and block crossings. The 4th Avenue crossing in Camanche is frequently blocked by trains of current length. Increasing those train lengths will block more crossings in the city. Compounding the situation is the rotating bridge on the UP line which may restrict UP traffic due to barge traffic on the Mississippi River. All of these circumstances lead to regular traffic delays which will only worsen with higher volume and longer trains. The study does not adequately address these unique circumstances in Camanche. See attached image for details.

NOISE POLLUTION

Local ambient noise levels will increase as a result of increased train traffic. The existing rail traffic occurs at all hours of the day and night. CP controls 7 at grade crossings in Camanche. Increased train traffic and the sounding of train horns at all at-grade crossings will cause negative health effects to adjacent residents. As a result of existing train traffic, city staff have received multiple requests from residents to do something about the use of train horns.

WATER RESOURCES

The CP mainline rail crosses major access points to the Mississippi River. The City of Camanche operates 3 public access points, while the Camanche Marina, a privately owned business, operates an access point. These points are important to recreational access to the river. Of particular concern is the Swan Slough boat ramp which typically has a full parking area for recreational use of the river. There are over 60 slots available for parking at this location. Additional train traffic and crossing blockages will create issues for the access to river usage.

HUMAN SERVICES AND HISTORIC RESOURCES

The Camanche Public Library and the Camanche Train Depot Museum are both located on the easterly side of the tracks. The library is frequented by citizens who are in need of services which they need for daily use. The volume of children and adults of low to moderate income families continues to grow. Limited access to these services will be a detriment to their needs. The City is preparing the Train Depot Museum for renovation. This depot is one of 3 remaining in the State of Iowa. The City plans to begin holding train safety events

beginning the summer of 2023 in order to address the safety concerns for all of the youth in the community.

HAZARDOUS OR TOXIC SUBSTANCES

Trains on an almost daily basis travel through Camanche carrying hazardous materials that can be recognized by reading their hazardous materials placards. Frequently carried hazardous or toxic substances through Camanche include ammonia, ethanol, and highly explosive light petroleum products. On any given day, one can observe on the railroad tracks running through the residential areas in Camanche broken or missing fish plate bolts, railroad spikes missing from tie plates, sleepers that have heaved out of position, and contaminated ballast that allows excessive vertical movement of the steel rail when trains pass over them. The suspect overall condition of the railroad tracks throughout Camanche in combination with higher train counts of trains carrying hazardous or toxic substances increases risks of a catastrophic event to unacceptable levels.

DIRECT, INDIRECT, AND CUMULATIVE EFFECTS

Cumulative impacts result from the incremental impacts of a proposed action when added to other past, present, and reasonably foreseeable future actions (40 Code of Federal Regulations [CFR] Section 1508.7). Indirect impacts are those that are caused by a proposed action, but that may occur later in time or farther removed in distance, relative to the primary impacts of the proposed action (40 CFR Section 1508.7).

The primary negative effects to Camanche as a result of the proposed Canadian Pacific acquisition of and merger with Kansas City Southern would be a permanent decrease in the quality of life for its residents, and create negative economic impacts to the citizens of Camanche who will see a decrease in property values. Overall, the proposed merger combined with past, present and foreseeable impacts, will result in a significant cumulative impact.

MITIGATION

To preserve the future integrity of critical regional infrastructure, recreational amenities, and residents' quality of life in Camanche, the City is only supportive of the proposed merger between the Canadian Pacific and Kansas City Southern Railroads under the following conditions:

1. Canadian Pacific funds and constructs at least one overpass and/or underpass within the City of Camanche to address emergency services needs and evacuation routes.
2. Canadian Pacific funds the purchase of an ambulance with all equipment similar to that which the City of Camanche already maintains in order to provide an additional emergency vehicle to be used in case all crossings are blocked until said overpass or underpass is completed in addition to the construction of a pedestrian overpass that is ADA compliant near where the emergency services equipment is housed.
3. Canadian Pacific funds and constructs a Quiet Zone throughout the community.

4. Canadian Pacific creates an impact barrier between the railroad tracks and the limits of railroad right-of-way to protect the neighboring properties from the negative impacts of the increased volume.
5. Canadian Pacific commits to installing Centralized Traffic Control (CTC) advanced technology to minimize the blocking of crossings.
6. Canadian Pacific identifies a location outside of Camanche where it will stop and queue trains when there is a need to stop a train for anything other than an emergency situation, in order to minimize blocked train crossings in Camanche's urban area.
7. Posted train speeds are lowered to 20 miles per hour throughout Camanche's urban area to mitigate ground vibrations.
8. The safety conditions of the railroad's infrastructure be examined and evaluated by the appropriate federal regulators, and the necessary corrective actions be imposed.

The City of Camanche requests that Canadian Pacific must be held accountable to protect communities along their tracks from substantial harm, by mitigating the environmental impacts listed above, through methods including but not limited to separated grade crossings, restricted speeds, and upgraded tracks, crossings, and safety features.

As of the date of this letter, Canadian Pacific Railroad has offered \$200,000 in exchange for closing the crossings at 5th Avenue and at 7th Avenue. Not only are these crossing closures not acceptable to the City of Camanche, the funding amounts do not adequately address the cost of mitigating the issues which would be created by the proposed merger.

The City also requests that a member of the Surface Transportation Board visit Camanche in person prior to a decision on this merger to view first-hand how the merger will have a disastrous impact on this community.

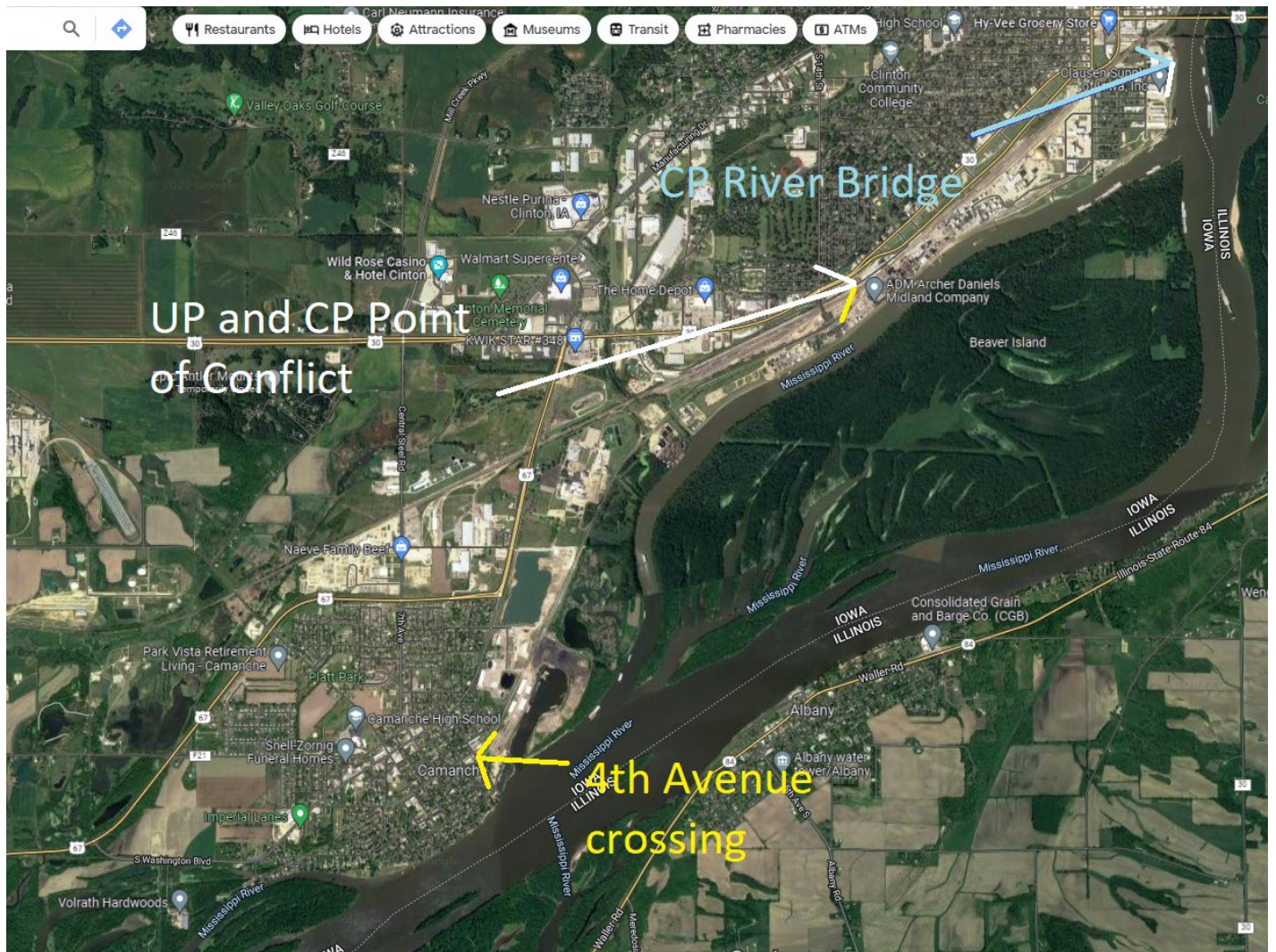
In closing, the City of Camanche asks for balance among the interests of the railroad, industry, and the citizens and businesses of Camanche, recognizing that the railroad and communities must co-exist and work together.

Sincerely,

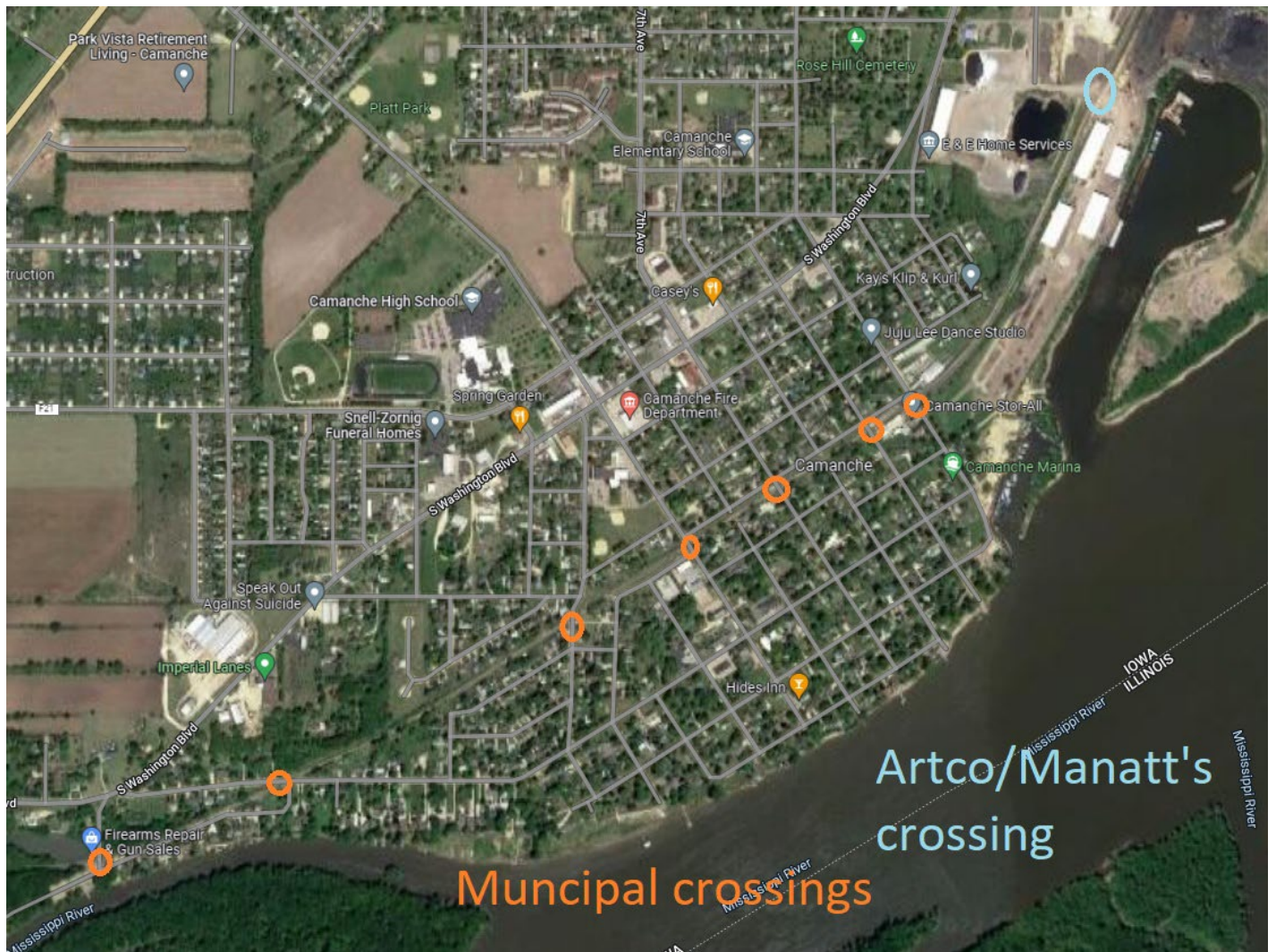
Andrew S. Kida

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cc. All Parties of Record



Map for concerns of conflict between CP and UP and crossing blockages in Camanche



All crossings in Camanche