



Susan W. Leuthauser, Ph.D.

swleuthauser@gmail.com

5237 Remington Road, Bettendorf, Iowa 52722

October 4, 2022

Surface Transportation Board

Docket # FD 36500

RE: Canadian Pacific Acquisition of Kansas City Southern Railroad

Dear Members of the Board:

I was unable to attend the Sept 13th Davenport STB Environmental Impact Statement (EIS) public meeting because I was in surgery, I would like to share with you my concerns about the Canadian Pacific acquisition of Kansas City Southern railroad.

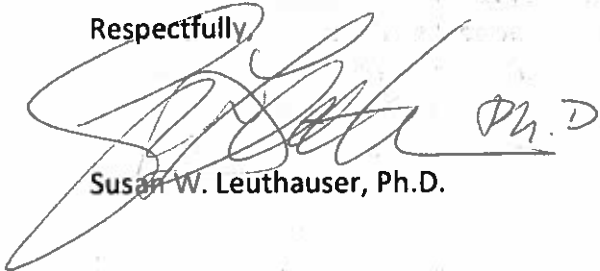
I appreciate the importance of the railroad to commerce. It is more efficient way to transport goods and passengers; it reduces traffic on roads and highways and reduces emissions of air pollutants. Without a doubt, rail transportation saves lives, reduces the use of petroleum fuels and benefits the environment; additionally, the lower transportation cost of goods can be passed on to the consumers. I'm in favor of improving the existing railroad system so it can better support the transport of goods and passengers. However, when hazardous materials are being transported, safety along the route should be one of the main concerns. If approved, CP will bring 22 crude oil trains from Canada to Mexico each day; part of the route will be through Scott County, Iowa along the bank of the Mississippi River. The Mississippi is the second longest river in North America, many buildings are less than 100 feet from the railroad track; some of them are 100+ years old, they are homes to families, businesses, and industries. The OEA recognized that the increase in rail-related noise can be annoying, however, the draft EIS went on to say that "people may be able to feel vibration from passing trains and that vibration could cause annoyance, but damage to buildings or other structure would not occur". Repeated exposure to vibration from the passage of heavy trains over time can cause damage to the foundation of these old buildings. Many of these buildings sit on the flood plain, they are already on unstable ground. Vibration can also affect precision of equipment used by business and industries located next to the railroad track.

Brake failure seems to be a frequent occurrence with CP trains; sending a train with faulty brakes on its way seems to be a common practice. This caused the death of three CP employees in 2019 <https://www.cbc.ca/news/canada/calgary/cp-rail-lawsuits-victims-fatal-derailment-1.5991122>. When failed brakes and mechanical defects are identified but not corrected, any safety plan like the Safety Integration Plan (SIP) becomes meaningless. Statistics tells us that when the train frequency is increased by 2.75 folds, the risk of having an unplanned incident will also go up by 2.75 folds. With this acquisition, we can expect a 2.75 X increase in incidents.

The draft EIS states that CP prepared a proposed SIP, did the plan address the impact of the acquisition on the safety of the citizens living or working in the affected communities? Many residents and businesses are located on the river side of the railroad track, rail crossings are their access to the main roads. When a train is traveling through or stopping at the crossings, the area is

I urge you, members of STB, to seriously consider the impact of this acquisition on the citizens of the US; our quality of life, our safety and health and the environment of the affected communities and denied the acquisition.

Respectfully,

A handwritten signature in black ink, appearing to read 'S. Leuthauser', followed by 'Ph.D.' written in a separate, slightly larger script.

Susan W. Leuthauser, Ph.D.