



Public Works Department Transportation & Engineering Division

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December 2, 2022

Surface Transportation Board
Office of Environmental Analysis
Attn: Diana Wood
Washington, DC 20423

RE: Environmental Filing, Docket No. FD 36500 (sub no. 1)

Ms. Diana Wood:

The City of Kansas City, MO (Kansas City) is proud of its history and continued position as one of our country's top railroad hubs. Since 1887 Kansas City Southern Railway Company (KCS) has been an integral part of our city's economy and a catalyst for our continued growth and success. Overall, the leadership of Kansas City is in favor of the growth and consolidation of KCS to form the first and only NAFTA rail corridor. We anticipate positive economic growth as a result of this merger and the continued position of Kansas City as the railroad hub for NAFTA freight movements.

However, with the anticipated increased in rail traffic, Kansas City has some concerns regarding the exacerbation of existing safety and quality of life issues regarding existing at-grade crossings. Note that many of these impacts are within EJ Census Tracts. Specifically, Kansas City would like to comment on three of OEA's identified environmental impacts:

1. Rail/roadway at-grade crossing (grade crossing) safety;
2. Grade crossing delay; and
3. Noise and vibrations

At-grade crossings of concern

According to the maps included with FD 36500 and information available at in the [Draft EIS | CP-KCS Environmental Impact Statement \(cp-kcsmergereis.com\)](#), the proposed KCS Divestiture Line subject to this NEPA review includes several at-grade crossings of concern. Table H.1-1 from the Draft EIS, included below, identifies two crossings of major concern to us:

- 329762T – 12th Street
- 329764G – 17th Street

These two grade crossings bisect the eastern section of the Blue River Valley Industrial Area (BRVIA), which is Kansas City's largest industrial district. Due to a successful US Army Corps (USAC) flood control investment, the industrial area has experienced significant growth in the recent years. The BRVIA is additionally bisected on its western section by two Union Pacific (UP) at-grade crossings on 12th St and 17th St which are located 1,150-feet and 530-feet from the KCS crossings respectively.

The Union Pacific and the KCS at-grade crossings are not synchronized, and as a result, vehicular traffic on 12th and 17th Street is often unable to enter and/or exit the BRVIA.

It is concerning that a number of existing at-grade crossings within Kansas City subject to review were not listed within Table H.1-1 (see following page). The locations of the omitted at-grade crossings include but are not limited to North Olive Street, North Kansas Avenue and North Lydia Avenue. North Olive Street near East Front Street is a main arterial within the Kansas City's very busy Northeast Industrial District. Lengthy unit trains coming to and from Knoche Yard often block vehicular traffic from East Front Street crossing south using North Olive, exacerbating detrimental air quality conditions, and creating long delays and substantial life/safety concerns. This multi-track grade crossing also impedes economic growth in this important district of Kansas City which has been the subject of enormous local and federal investment, including, among other things, millions expended for substantial environmental remediation made at Berkley Park, a fast-growing residential and commercial district along the Missouri River. The City, coupled with state and federal dollars, has prioritized an investment of millions at Berkley Park – dollars needed to install infrastructure and other improvements required to support the construction of a large new soccer sports facility which will add vehicular traffic to the North Lydia Avenue crossing.

At-Grade Crossing Safety and Delay

The expected Trains per Day (TPD) traveling through the two identified at-grade crossings will increase from 17.57 TPD to 30.41 TPD according to the draft EIS (see Table H.1-1 below). This means number of trains will almost double in 2027 as a consequence of the merger. This will negatively impact the 12th St and 17th Street at-grade crossings at the BRVIA. Table H.1-1 of the draft EIS states that the overall length of the trains will be 124-feet less which decreases the gate-down time from 3.1 minutes to 2.9 minutes, however the number of trains per day (TPD) almost doubles so the overall gate-down time per day will increase from 54.5 minutes/day to 88.16 minutes/day. The overall increase in gate-down time will negatively impact the economic activity at the BRVIA. When taken in conjunction with the Union Pacific crossings located just to the west, the overall access to the BRVIA will be very difficult for industry, employees and emergency services.

Table H.1-1 Inventory of Public Grade Crossings by State, County, and City

State	County	City	Street	Crossing ID	AADT	Train Speed (mph)	Train Length with No Action (feet)	Train Length with Proposed Acquisition (feet)	Trains Per Day with No Action	Trains Per Day with Proposed Acquisition	Average Gate Down Time with No Action (minutes)	Average Gate Down Time with Proposed Acquisition (minutes)
Missouri	Grundy	Galt	110th Street	375580E	59	40	12126.8	7209.8	3.41	17.81	4.0	2.6
Missouri	Grundy	Laredo	65th Street	375562G	23	40	12445.2	7044.6	3.98	18.38	4.1	2.6
Missouri	Grundy	Laredo	Baha Lane	375574B	6	40	12126.8	7209.8	3.41	17.81	4.0	2.6
Missouri	Grundy	Laredo	First Street	375569E	283	40	12126.8	7209.8	3.41	17.81	4.0	2.6
Missouri	Jackson	Grandview	Duck Road	329806R	1757	45	8898.7	7974.9	17.57	30.40	2.8	2.6
Missouri	Jackson	Grandview	Main Street	329807X	6087	55	8898.7	7974.9	17.57	30.40	2.4	2.2
Missouri	Jackson	Kansas City	12th Street	329762T	1404	40	8898.7	7974.9	17.57	30.40	3.1	2.9
Missouri	Jackson	Kansas City	17th Street	329764G	3189	40	8898.7	7974.9	17.57	30.40	3.1	2.9
Missouri	Jasper	Asbury	Main Street	330014T	152	55	8508.0	7385.4	16.17	28.58	2.4	2.1

At-Grade Noise

Due to FRA safety regulations, train crews are required to blow their horn when approaching an at-grade crossing for the protection and safety of motorists and pedestrians regardless of whether crossings with gates and lights are present. These train horns are very disruptive to residents, specially at night. The train horns can be heard for a very long distance and negatively affect the sleep of residents which is a major health concern.

Kansas City has recently been working with our railroad partners to enact 'quiet-zones' to mitigate the train horn issue. However, quiet-zones are not eligible to be funded from the at-grade crossing safety funds and the city is often required to pay for all of the engineering, RR review fees, and project costs which surpass \$125,000 per location.

The increased Trains per Day (TDP) from 17.57 TPD to 30.41 TPD due to the proposed acquisition will significantly increase the number of train horns sounding at night which will negatively impact the sleep and health of neighboring residents.

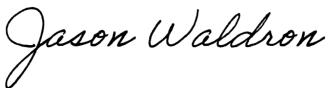
Request for Mitigation

Kansas City respectfully requests that mitigation measures be included in the NEPA record of decision to address the negative impacts as enumerated above. Mitigation measures should include:

1. Coordination between the railroad companies (Union Pacific, KC Terminal, KCS, CP, CN) regarding gate-down closures of 12th and 17th Street within the BRVIA;
2. Improvements to alternative access/egress routes for the BRVIA including replacement of the 12th Street Bridge over the Blue River and separation of the grade crossings;
3. Quiet-zone improvements at all at-grade crossings to decrease the frequency and volume of train horns (especially at night).
4. Grade separated crossings at North Olive Street and North Lydia Avenue.

We are thankful for the opportunity to comment on this very important issue affecting our community. Please feel free to reach out to Jason Waldron, Transportation Director, City of Kansas City, MO (816-799-4792/jason.waldron@kcmo.org) for further coordination.

Sincerely,



Jason Waldron, P.E
Transportation Director
City of Kansas City, Missouri

