



SIERRA CLUB

EAGLE VIEW GROUP

September 16, 2022

Sierra Club, Eagle View Group
29103 251st Ave.
PO Box 407
Princeton, IA 52768

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

RE: FD 36500 – Canadian Pacific-Kansas City Southern Merger

Dear Mr. Wayland,

There is nothing more important to Iowans than the vitality of our communities and environment. Our crops feed the world and the Mississippi River attracts thousands of tourists every year. American Rivers has ranked the Mississippi River as the country's sixth most endangered, mostly due to pollution and the resulting habitat loss.

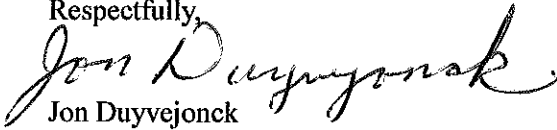
The DEIS is deficient because it does not adequately evaluate the effects of potential spills on freshwater mussel resources which exist immediately adjacent to the rail line in several locations. In the past twenty years or so, there have been multiple train derailments along the Iowa shoreline that have impacted State and Federal endangered species, in particular, the Higgins pearly mussel (*Lampsilis higginsii*). The impact of doubling the train traffic does not appear to have been addressed with regard to multiple state and federally listed freshwater mussel species.

Besides the potential to damage the Mississippi River through derailments, spills, and accidents, this merger will exacerbate well-known air quality issues in the region. The Environmental Protection Agency already designates Muscatine County as a "nonattainment zone," or one with higher-than-acceptable levels of air pollutants. Although invisible, these molecules can have devastating effects on public health.

This merger, despite contrary claims, will do nothing to solve this issue. In fact, according to the draft EIS, specifically Table K.5-1, all the new rail traffic will increase harmful emissions in eastern Iowa and beyond. The draft EIS notes 1,088.8 tons of annual CO2 emissions are associated with this proposed acquisition. Additionally, we can expect 5,724.9 tons of annual NOx emissions. To put that in perspective, that's equivalent to 100,000 automobiles' worth of yearly CO2 emissions and six-and-a-half weeks' worth of operating a large coal plant in terms of NOx pollution. While the merger may divert some freight to trains from semi-trucks, it does not offset the increased rail traffic.

For these reasons, we ask the Surface Transportation Board to deny this merger.

Respectfully,

A handwritten signature in cursive script, reading "Jon Duyvejonck".

Jon Duyvejonck

Chairperson, Sierra Club,
Eagle View Group