

September 26, 2022

Joshua Wayland
Surface Transportation Board
c/o VHB
940 Main Campus Drive
Raleigh NC 27606

RE: Environmental Filing Document No. FD 36500

Dear Mr. Wayland:

I was one of the many people who attended the Public Meeting at the River Center in Davenport, Iowa a couple weeks ago, and listened to your presentation on the methodology and findings of the Draft Environment Impact Statement regarding for the Surface Transportation Board. I was also fortunate enough to be able to access and review the draft EIS prior to the meeting, and again afterward. As such, and given my own professional background as an economic and community developer in the Quad City region for 35 years to contribute a letter to you as directed at the public meeting.

An analysis of the EIS research and findings is beyond my ken, and in any case will likely will be covered my multiple letters submitted by people whose engineering and planning background may make their reasonings carry more weight. My offerings will focus on observations and practical concerns that hopefully be the concerns of the STB as they consider the proposed merger of the Canadian Pacific and Kansas City Southern railroads, to wit:

1. From a macroeconomic perspective, the continuing trend of mergers among railroads can only result in an oligarchic or monopolistic model, which is not in the best interest of the rail customer, and runs counter to the free market precepts of capitalism. Competition and innovation have been at the forefront of our economic model, and attempts of grow by such mergers and acquisitions run counter to it. It is to be expected that other rail lines would not welcome such an approval.
2. This particular proposal appears to be a "work-around" to the recently scuttled Keystone pipeline project, in which tar sand was to be shipped by pipeline from Alberta through the Dakotas and down to Texas, there to be transported overseas to markets in Asia. The widespread raising of concerns by environmentalists, engineers and advocates representing the interest of land owners combined to close down the project.

This proposal to ship the same pollutant materials by rail along the corridors of many riverfronts and communities is shortsighted and harmful. The intention of the route to run from Texas into Mexico, then west to an intermodal facility on that country's Pacific coast underscores the intent to provide such environmentally hazardous materials to other parts of the world to the ultimate detriment of the planet.

As a sidenote, a review of the much vaunted "job creation" impact of the project shows that the employment would be done primarily in Canada. Nothing whatever against our friendly neighbors to the north, but it is disingenuous to impact this project will be of economic benefit to non-stockholders of the firms involved.

3. On a more micro-economic scrutiny, it appears clear that the adversely impacted geographic areas along the proposed route will include Clinton, Scott and Muscatine Counties in Iowa, along the Mississippi River, which is adjacent to the Canadian Pacific Railway, and where rail traffic will likely triple. The safety, noise and vibration concerns of this increase may be covered elsewhere. Suffice it to say at this point that an inventory of property and older historic buildings in these counties appears to be cursory at best, and in need of further examination beyond the scope of the draft EIS.
4. In the City of Clinton there are multiple examples of riverfront properties where rail runs close to industrial plants and the potential for spillage exists, requiring potential remediation that is fast and thorough.
5. The rail runs through the smaller river towns of Comanche in Clinton County, and Princeton in Scott County. The rail is very close to the Mississippi River. Efforts to redevelop along this area would be thwarted, stifling efforts at reinvestment and choking off economic diversification and enhancement of quality of life.
6. Further down river, almost adjacent to Princeton is the rapidly growing city of LeClaire, also in Scott County. This community has been very innovative in its redevelopment efforts, and has been notably successful in remaking its riverfront and the attendant commercial corridor along its recently expanded Highway 67. There has been a great deal of historically-minded preservation and construction in the area, to the extent it has become a regional destination point for persons interested in wineries, retail and upper scale restaurants. The advent of a derailment along the CP rail has done nothing to enhance this appeal and the proposed increase in railcars traffic would place at risk the existing commercial development along the river, as well as the considerable amount of residential, much of which has existed for many decades. With a population of just under 5,000 timely efforts to remediate any disaster and prevent pollutants from falling getting into the river would fall to the county, and to the railroad.
7. In Riverdale, further down the river is the Arconic Manufacturing plant, which has existed here (formerly as Alcoa) since 1948, and has some 2400 employees, working multiple shifts. Other persons schooled in planning and engineering will write of concerns related to the tripling of traffic on the rail, which runs between the plant and highway 67. Suffice here to say the potential for derailment would increase, as would the propensity for accidents, particularly at times which work shifts are changing. Provisions for improved safety would have to be made, by the rail road, the IDOT and Arconic Manufacturing, all in the interest of enhancing the profitability of the merged rail lines.
8. Safety concerns would also come to the fore in Bettendorf, which has multiple rail crossings and an access ramp going over the rail, as well as the recently constructed Interstate 74 bridge, which is a north-south bisector of the Quad City region and the recipient of increasing amounts of traffic. The Bi-State Regional Commission has been involved in the planning of this facility for multiple decade and would be a good source of information on it.

9. The City of Davenport, adjacent to Bettendorf, is the largest city in Scott County, and has been the object of a considerable amount of reinvestment, essentially the conversion of former warehouse and distribution space and office space to residential use, creating a critical mass for potential retail. It also is in process of enhancing its amenity base, creating the River Edge, an ice skating area, the \$47 million Figge Museum, a very successful Farmer's Market at the Union Station, LeClaire Park Band Shell and many eateries and beverage hosting establishments.

Perhaps most prominent is the riverfront's Modern Woodman stadium, built in 1931 and renovated in 2003. This nationally recognized baseball stadium has recreational amenities around it, serving to attract person of all ages. It is home to the Single "A" Quad City River bandits and has parking surrounding the area. It is also along the rail and the river, and has a berm surrounding to prevent flooding. It is a complement to the bike path and other amenities along the riverfront.

10. Final mention for me includes the Nahant Marsh, arguably the most important site along the rail lines, and the most at risk within Scott County. This 305-acre site has been transformed from a little-known switch yard and site of an old skeet-shooting club into a restored habitat for wildlife and plants indigenous to the area. Again, other more familiar that I with Nahant March will hopefully speak to its value as an education center for environmental study, a recreation center, and a monument to what can be accomplished to undo damage to a once pristine area. The impact of increased rail traffic to this area is painful for many to contemplate, not least because it is unnecessary. Without proper policies and dedication to timely remediation of damage done by derailments and spillage of harmful chemicals, this vital area would be ruined at the cost social, environmental and, yes, financial.

I encourage the STB to weigh these elements in rendering a decision on the impact of the proposed merger. Considering the pros and cons, the opportunity costs, sunk costs and remediation costs, it would appear there outweigh the benefits to the rail stockholders.

Sincerely,

Scott D. Tunnichliff, M.B.A.
Economic and Community Developer