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September 14, 2022

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

Dear Mr. Wayland,

I write to you today to comment on the draft EIS of the CP-KCS merger and the impact it will have on my business and community. I am Vice President of a small Ready Mixed-concrete operation based in Davenport, IA. We are a sixth-generation family business with deep roots in the community and the eastern Iowa region.

As a family member in a family business I have an obligation to foster a safe workplace for our employees. One of the aspects of that obligation is to identify potential hazards and do what can be done to mitigate them. This railway merger is an extreme hazard for our operation at our East River Drive plant in Davenport. See the below image for understanding of how the railway bisects our operation on that site.



Our tractor-trailers, hauling sand and stone, cross these tracks on average about 55 times a day to supply our aggregate piles. Our wheel loader crosses the tracks about 30 times a day to go back and forth from the aggregate piles and to our scale house. Ready mix concrete trucks cross the tracks about 40 times a day to use our washout pit on the river side of the tracks. Sand yard customers, in dump trucks and pickups, cross the tracks about 25

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times a day picking up aggregates. That works out to approximately 150 crossings a day from Hahn Ready Mix employees or our customers. The increased train traffic *significantly* increases the chance of a collision between any of these heavy trucks and a train. This elevated risk is unacceptable.

In the STB public meeting on September 13th in Davenport, IA, it was brought up that the highest risk from a safety perspective, and highest impact to rail crossings in the whole CP-KCS system was the stretch between Mound and Marquette streets in Davenport. I fear that the highest likelihood of a catastrophic accident in that window, is on our property where there are no crossing safety apparatus or alternate route for us to access our river-side yard. My nightmares involve a collision between a train and a loader with an accompanying derailment right along a busy bike path and multiple parks.

Beyond the safety concerns, this acquisition will have a significant financial impact to our operation. Not only will our trucks crossing at the East Davenport plant be often held up by trains but we'll have to cross the tracks again to reach our suppliers Holcim Cement and Riverstone Group, both in Bettendorf, IA along the same tracks. We'll also be affected reaching Continental Cement in Buffalo, IA. Furthermore, our ready mix plant in Muscatine, IA could also have additional delays as we are adjacent to the CP main track line there as well. Overall, we estimate that the additional wait time could damage us in excess of \$250,000/year. While this is peanuts to an outfit like CP, it puts tremendous strain on a small business like ourselves.

Finally, as a resident of the Quad Cities, it is a travesty to separate our greatest resource, the Mississippi River, from the region's people. My family and I often walk along the bike path on the riverfront. A major metropolitan riverfront is not the place for a rail super-highway. I thank you for your attention to this matter. I know that for much of the length of the proposed acquisition tracks, life will not be substantially different. But for the people and businesses in the Eastern Iowa, this acquisition will be crippling. We beg you to find a way to ease the burden on our communities.

Sincerely,



Griffin Hahn
Vice President
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