

April 15, 2024

Jay C. Johnson

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Danielle Gosselin
Director
Office of Environmental Analysis
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Re: Docket No. FD 36500, CPKC Quarterly Environmental Mitigation
Measures Report for December 15, 2023 to March 14, 2024

Dear Ms. Gosselin:

The Board's decision approving the merger in this proceeding requires CPKC to submit quarterly reports to the Office of Environmental Assessment "on the progress of, implementation of, and compliance with all Board-imposed environmental mitigation measures." The decision also explains that "[t]he Board's consistent practice in imposing environmental conditions is to mitigate only impacts resulting directly from the transaction." OEA studied those impacts in its EIS.

With this letter, CPKC is enclosing its fourth quarterly environmental mitigation measures report. You will see that the report covers mitigation for the impacts studied in the EIS during the quarter starting December 15, 2023 and ending March 14, 2024.

As always, we are happy to discuss these issues with you, so please contact me if you have any questions.

Sincerely,



Jay C. Johnson

Danielle Gosselin
April 15, 2024
Page 2

cc: Elizabeth Webster
Joe Van Humbeck
Glen Wilson
Alan Summerville
Waymon Peer



CPKC Quarterly Environmental Mitigation Measure Compliance Report Number 4

This report includes compliance activities completed between December 15, 2023, and March 14, 2024 (Quarter 4, Year 1 of the STBs oversight period following the acquisition of KCS by CP, STB Docket FD 36500)

Measure Number	Mitigation Category	Voluntary/Mitigation Measure	Compliance Activity
1	General Mitigation Measures	VM-General-01. <i>The Applicants will continue to engage in good faith with potentially affected communities along the combined network, listen to their input related to the proposed merger and strive to reach negotiated agreements to address merger-related impacts.</i>	CPKC representatives continue to regularly meet with communities along the combined network to listen to their input and address their concerns. In addition to this regular cadence of meetings, including those centered around the implementation of mitigation (which are discussed further below), CPKC representatives continue to engage with communities in meetings and events to ensure open lines of communication and an ongoing dialogue. CPKC’s engagement is not limited to communities; during the quarter CPKC representatives also met with federal and state legislators in states across the combined network.
2	General Mitigation Measures	VM-General-02. <i>The Applicants will follow all applicable Federal Railroad Administration (FRA) and Occupational Safety and Health Administration construction and operational safety regulations to minimize the potential for incidents during construction of the Capital Improvement Projects and operation of the combined network.</i>	During the reporting period, CPKC complied with all applicable FRA and OSHA regulations, except that CPKC received two Notice of Violation and accompanying fines from the FRA related to operational safety of employees: Notice of Violation – December 19, 2023 – Franklin Park (Illinois). Railcar left unsecured at Mechanical Facility. Notice of Violation – January 24, 2024 – Minneapolis (Minnesota). High voltage cover observed missing on top of a locomotive traction motor.
3	General Mitigation Measures	MM-General-01. <i>If there is a material change in the facts or circumstances upon which the Board relied in imposing specific environmental mitigation conditions, and upon petition by any party who demonstrates such material change, the Board shall consider revising its final mitigation, if warranted and appropriate.</i>	CPKC is not aware of any material changes in the facts or circumstances upon which the Board relied.
4	General Mitigation Measures	MM-General-02. <i>The Applicants shall submit quarterly reports to OEA on the progress of, implementation of, and compliance with all Board-imposed environmental mitigation measures. The reporting period for these quarterly reports shall begin on the date of the Board’s final decision authorizing the acquisition and continue for seven years, or one year after the Applicants have completed capital improvements related to the acquisition, whichever is longer. The Applicants shall submit copies of the quarterly reports within 30 days following the end of each quarterly reporting period and distribute the reports to appropriate federal and state agencies, as specified by OEA.</i>	This is CPKC’s fourth quarterly compliance report, covering the period of December 15, 2023 to March 14, 2024.

Measure Number	Mitigation Category	Voluntary/Mitigation Measure	Compliance Activity
5	General Mitigation Measures	MM-General-03. <i>To minimize the potential for impacts for impacts on biological resources, water resources, hazardous materials release sites, and cultural resources, the Applicants shall, to the greatest extent possible, confine construction activities related to the planned capital improvements to the area within the existing ROW.</i>	CPKC continues to work with the selected contractors to limit construction works to the greatest extent possible to the existing Right-of-Way (ROW).
6	Freight and Passenger Rail Safety	VM-Rail-01. <i>The Applicants will comply with FRA and Pipeline and Hazardous Materials Safety Administration regulations applicable to the safe and secure transportation of hazardous materials.</i>	During the reporting period, CPKC complied with all applicable FRA and PHMSA regulations and did not receive any fines or notices of a recommended violation related to the transportation of hazardous materials.
7	Freight and Passenger Rail Safety	VM-Rail-02. <i>The Applicants will comply with the Safety Integration Plan (SIP), prepared pursuant to 49 C.F.R. Part 1106, which may be modified and/or updated as necessary to respond to evolving conditions and/or new information. In the event of a reportable hazardous materials release, the Applicants will notify appropriate federal, state, and local agencies, as required under applicable law.</i>	CPKC continues to progress the integration plans set out in its approved Safety Integration Plan (SIP) and has regular communications with the FRA regarding the SIP. All reportable hazardous material releases were reported to appropriate federal, state and local agencies as required under applicable law.
8	Freight and Passenger Rail Safety	VM-Rail-03. <i>The Applicants will conduct Transportation Community Awareness and Emergency Response Program (TRANSCAER) workshops (training for communities through which dangerous goods are transported) in potentially affected communities that request this training. The Applicants will conduct the workshops in English and, upon request, Spanish. Training will include support for appropriate access to the AskRail app and its use to facilitate rapid, real-time access for qualified responders to information about hazardous materials in rail transportation.</i>	The CPKC Emergency Response and Hazardous Materials team completed 19 TRANSCAER and other training events during the reporting period, engaging with over 450 first responders. This included 12 events in Elgin, IL over 3 days, reaching 188 Firefighters and Emergency Operations Center personnel.
9	Freight and Passenger Rail Safety	VM-Rail-04. <i>The Applicants will offer to fund the participation in railroad focused emergency response training at the Association of American Railroads' Security and Emergency Response Training Center in Pueblo, Colorado, of two qualified firefighters providing service within each of the potentially affected communities.</i>	During the reporting period, the CPKC Emergency Response and Hazardous Materials team continued to enroll firefighters and prepare for the planned training. In response to feedback received from Fire Departments across the network, this training will be offered at the Security and Emergency Response Training Center (SERTC) in Pueblo, CO as well as the Illinois Fire Service Institute (IFSI), the Texas A&M Engineering Extension Service (TEEX) and the Mississippi Fire Academy (MFA). The 2024 dates currently booked for training are: SERTC – April 23-25 and October 23-24 IFSI – October 8-9 and October 10-11

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			TEEX – April 4-5 and April 13-14 MFA – May 13-17
10	Freight and Passenger Rail Safety	VM-Rail-05. <i>The Applicants will leverage CP’s extensive emergency response equipment assets by reviewing coverage of those assets across CPKC. The Applicants will either redistribute existing assets or add new equipment assets to improve emergency response capabilities relating to the potentially affected communities on CPKC.</i>	The two new Emergency Response and Hazardous Materials Officers previously discussed have now joined the CPKC team and are based in Shreveport, LA and Minneapolis, MN. They have been spending time meeting with fire departments within their respective territories and building relationships. In 2024, CPKC is also currently planning to add a Transfer Trailer and an Incident Management Trailer in Kansas City. Additionally, three Emergency Management Meeting Tents (with HVAC) and three fire trailers will be purchased for distribution across the southern portion of the combined network.
11	Freight and Passenger Rail Safety	VM-Rail-06. <i>The Applicants will abide by their commitments to Amtrak in their agreement dated December 17, 2021. In general, the Applicants will support the efforts of Amtrak and the Southern Rail Commission to establish Amtrak service between New Orleans and Baton Rouge, and study the potential for Amtrak service between Meridian, Mississippi and Dallas, Texas. Additionally, Applicants will work with Amtrak to increase the frequency on the Hiawatha service between Chicago and Milwaukee; extend Hiawatha service from Milwaukee to Saint Paul and create a second round-trip on the Twin Cities-Milwaukee-Chicago corridor; and establish passenger service through the Detroit River Tunnel, connecting Detroit to Windsor, Ontario in order to facilitate passenger service between Detroit and Windsor connecting to VIA Rail.</i>	CPKC continues to engage with Amtrak and other stakeholders to abide by commitments in the agreement dated December 17, 2021. <u>Detroit to Windsor:</u> CPKC is in engaged with Amtrak on establishing this service. CPKC is waiting for Amtrak to present the proposed route and details on the new service. <u>Twin Cities-Milwaukee-Chicago corridor:</u> CPKC is awaiting Amtrak to start the new Borealis Service. Amtrak is working to get the final Agreements in place with Ramsey County and the States of MN, WI and IL. CPKC has been engaged with stakeholders on the new infrastructure projects required for the added service. <u>Hiawatha service:</u> CPKC has been working with stakeholders from Amtrak and WisDOT on the agreed upon infrastructure projects around the Milwaukee area. Design work continues to progress on these projects. Once these projects are completed Amtrak will be allowed to add an eighth round trip. Amtrak, Wis-Dot and CPKC have a monthly call to discuss what new infrastructure projects that will be needed to add the ninth and tenth roundtrips. <u>New Orleans-Baton Rouge:</u> CPKC representatives continue to participate in bi-weekly calls with Amtrak and LADOTD to discuss the engineering study results and projects needed to initiate service.

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			<u>I-20</u> : CPKC representatives remain engaged on its commitments to studying I-20 service.
12	Freight and Passenger Rail Safety	MM-Rail-01. <i>The Applicants shall comply with the SIP prepared under 49 C.F.R. part 1106 and 49 C.F.R. § 244.9, which may be updated as necessary, and shall continue to coordinate with FRA in implementing the SIP during the operations integration period. The ongoing safety integration process shall continue until FRA has informed the Board that the integration of Applicants’ operations has been safely completed.</i>	CPKC continues to progress the integration plans set out in its approved Safety Integration Plan (SIP) and has regular communication with the FRA regarding the SIP.
13	Grade Crossing Safety and Delay	VM-Grade Crossing-01. <i>Although the Applicants have not identified any grade crossings that would require mitigation based on precedent established in other approved mergers, the Applicants will, upon request, work with potentially affected communities in support of securing funding, in conjunction with appropriate state agencies, for crossing mitigation projects where they may be appropriate under criteria established by relevant state transportation departments to increase the safety of existing at-grade crossings.</i>	CPKC continues to engage with communities interested in securing funding for crossing mitigation projects, including engagement with the Illinois Commerce Commission, Illinois DOT, Missouri DOT, Iowa DOT, and the FRA, in conjunction with communities both seeking to secure grade separation funding or crossing improvements as well as those who have secured funding to assist in implementation.
14	Grade Crossing Safety and Delay	VM-Grade Crossing-02. <i>The Applicants will operate under the General Code of Operating Rules rule numbers 6.32.6 (Blocked Public Crossings) and 6.32.4 (Clear of Crossings and Signal Circuits), which provide that, when practical, a standing train or switching movement must avoid blocking a public crossing longer than 10 minutes and, when practical, cars, engines and other equipment should not be left standing closer than 250 feet from a road crossing when there is an adjacent track.</i>	During the reporting period, CPKC received 94 reports to its Public Safety Communications Center (PSCC) / Community Connect regarding trains occupying/blocking crossing along the Chicago, IL to Laredo, TX corridor (this includes reports from the public as well as reports from CPKC’s Operations team). These incidents include: - 59 reports from Iowa (including 28 from the Scott County area, 14 from Muscatine County, 9 from Wapello County, and 16 from Clinton County) - 11 reports from Louisiana (all from Leesville) - 17 reports from Illinois (including 11 from Cook County and 2 from Dupage County) To be as complete as possible, CPKC also queried the FRA’s Blocked Crossing Database starting this reporting period. That database showed 22 reports of blocked crossings along the Chicago, IL to Laredo, TX corridor, including 12 from Wapello County, IA. Because the FRA database is

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			independent of reports to CPKC's PSCC, these 22 blocked crossings may involve some of the same incidents reported to the PSCC.
15	Grade Crossing Safety and Delay	VM-Grade Crossing-03. <i>The Applicants will consult with potentially affected communities to improve visibility at roadway/rail at-grade crossing by clearing vegetation where practicable.</i>	CPKC did not undertake any mechanical vegetation management at crossings during the reporting period.
16	Grade Crossing Safety and Delay	VM-Grade Crossing-04. <i>Where practicable, the Applicants will investigate the potential to create alternative access for properties whose sole access will be blocked more than once per week by a train stationary longer than 10 minutes at a single location.</i>	No new alternate access roads were proposed during the reporting quarter.
17	Grade Crossing Safety and Delay	VM-Grade Crossing-05. <i>For the construction of additional track through road crossings within the limits of the Capital Improvement Projects, where practicable, the Applicants will consult with local transportation officials regarding detours and associated signs, as appropriate, or attempt to maintain at least one open lane of traffic, as practicable, to allow the quick passage of emergency and other vehicles.</i>	During the reporting period, CPKC did not need to close any road crossings to facilitate the construction of the Capital Improvement Projects.
18	Grade Crossing Safety and Delay	VM-Grade Crossing-06. <i>The Applicants will notify Emergency Services Dispatching Centers for potentially affected communities of all crossings blocked by trains that are stopped and may be unable to move for a significant period of time.</i>	During the reporting period, the CPKC Public Safety Communications Center provided notice on 88 occasions to local Emergency Services Dispatching Centers along the Chicago, IL to Laredo, TX corridor on those occasions when a train was blocking a crossing and wouldn't be able to move for a significant period of time. This included 44 occasions in Iowa; 13 occasions in Illinois; 10 occasions in Louisiana; and 7 occasions in Missouri.
19	Grade Crossing Safety and Delay	MM-Grade Crossing-01. <i>The Applicants shall consult with appropriate state Departments of Transportation and other appropriate agencies, including the Illinois Commerce Commission for grade crossings in Illinois, prior to constructing, relocating, upgrading, or modifying grade crossings as part of the acquisition, including grade crossing warning devices, and shall abide by those agencies' reasonable requirements for the design of grade crossings and associated warning devices.</i>	CPKC remains engaged with appropriate state Departments of Transportation and the Illinois Commerce Commission and has met with the ICC, Illinois DOT, Iowa DOT, and Missouri DOT in the last quarter.

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20	Noise and Vibration	VM-Noise-01. <i>The Applicants will fund the improvements necessary to allow any potentially affected community with an existing Quiet Zone to maintain that designation should the increase in merger related train traffic cause that community to fall out of compliance with FRA regulations.</i>	CPKC is not aware of any Quiet Zones which have fallen out of compliance with FRA regulations as a result of merger related train traffic increases.
21	Noise and Vibration	VM-Noise-02. <i>While building the Capital Improvement Projects, the Applicants will work with their construction contractors to minimize, where practicable, construction-related noise disturbances between the hours of 2100 and 0700 local time.</i>	During the reporting period, no construction activities occurred between the hours of 2100 and 0700.
22	Noise and Vibration	VM-Noise-03. <i>In the construction of the Capital Improvement Projects, the Applicants will, where practicable and consistent with safe and efficient operating practices, use continuously welded rail in order to reduce wheel/rail wayside noise.</i>	All the Capital Improvement Projects have been designed with continuously welded rail.
23	Noise and Vibration	MM-Noise-01. <i>To minimize noise and vibration, the Applicants shall maintain rail and rail beds according to American Railway Engineering and Maintenance-of-Way Association standards.</i>	During the reporting period, CPKC complied with all applicable AREMA standards and FRA regulations and did not receive any Notices of Violation and accompanying fines from the FRA related to the maintenance of the rail or rail bed.
24	Noise and Vibration	MM-Noise-02. <i>The Applicants shall comply with FRA regulations establishing decibel limits for train operations.</i>	During the reporting period, CPKC complied with all applicable FRA regulations and did not receive any fines or notices of a recommended violation from the FRA related to the decibel limits for train operations.
25	Noise and Vibration	MM-Noise-03. <i>The Applicants shall consider lubricating curves where doing so would both be consistent with safe and efficient operating practices and significantly reduce noise for residential or other noise sensitive receptors.</i>	The initial analysis identified 20 locations which were candidates for lubrication (those locations where curves of four degrees or greater are in proximity to residential areas). Fifteen of these locations already have rail lubricators installed. CPKC has now begun the planning to install rail lubricators at the remaining five locations (Muscatine, IA; Ottumwa, IA; Joplin, MO; Stilwell, OK; and, San Diego, TX).

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26	Noise and Vibration	MM-Noise-04. <i>The Applicants shall employ safe and efficient operating procedures that, in lieu of, or as complement to, other noise mitigation measures can have the collateral benefit of effectively reducing noise from train operations. Such procedures may include:</i> <i>a) Inspecting rail car wheels to maintain wheels in good working order and minimize the development of wheel flats;</i> <i>b) Inspecting new and existing rail for rough surfaces and, where appropriate, grinding these surfaces to provide a smooth rail surface during operations;</i> <i>c) Regularly maintaining locomotives and keeping mufflers in good working order; and</i> <i>d) Removing or consolidating switches that the Applicants determine are no longer needed.</i>	a) During the reporting period, CPKC complied with all applicable FRA regulations and did not receive any fines or notices of a recommended violation from the FRA related to the maintenance of railcar wheels. b) CPKC completed 415 pass-miles of rail grinding on the Pittsburg and Heavener Subdivisions during the current reporting period. c) As part of CPKC’s routine locomotive maintenance program, mufflers and other components of the exhaust system are inspected at regular intervals and repaired as required. During the reporting period, CPKC was in compliance with all applicable FRA regulations and did not receive any Notices of Violation and accompanying fines from the FRA related to the maintenance of locomotive mufflers. d) CPKC removed one mainline switch on the Ottumwa Subdivision during the reporting period.
27	Noise and Vibration	MM-Noise-05. <i>The Applicants shall promptly respond to community inquiries concerning the establishment of Quiet Zones and assist communities in identifying supplemental or alternative safety measures, practical operational methods, or technologies that may enable the community to establish Quiet Zones in accordance with FRA’s final rule on the “Use of Locomotive Horns at Highway-Rail Grade Crossings.”</i>	CPKC remains engaged with communities inquiring about quiet zones and is working with a number of communities in reviewing and applying for quiet zones.
28	Air Quality and Climate Change	VM-Air-01. <i>The Applicants commit to developing Green House Gas (GHG) reduction targets for the combined network and request verification as appropriate from the Science Based Targets initiative (SBTi). As reference, CP’s current SBTi approved target is a 38.3% reduction in well-to-wheels GHG emissions (on an intensity basis) from locomotive operations by 2030 compared to a 2019 base year. CP has also committed to committed to 27.5% GHG reduction (on an absolute basis) by 2030 compared to a 2019 base year for non-locomotive Scope 1 and Scope 2 emissions. KCS has a SBTi target to reduce Scope 1 and 2 GHG emissions by 42% by 2034.</i>	Complete.
29	Air Quality and Climate Change	VM-Air-02. <i>The Applicants commit to undertaking a combined network in-depth climate scenario analysis aligned to Task Force on Climate-related Financial Disclosures (TCFD) recommendations to understand how a changing climate may impact CPKC. The Applicants further commit to improving the resiliency of the combined network to the physical risks of climate change through its capital program.</i>	CPKC has begun the process of completing this analysis and is currently reviewing proposals from firms interested in providing support.

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30	Air Quality and Climate Change	VM-Air-03. As part of the ongoing reconfiguration of Bensenville Yard (a non-merger related project being undertaken as part of the development of the Illinois Tollway's Elgin O'Hare Western Access Project), the Applicants commit to undertake studies to identify ways to reduce the GHG emissions (and by extension, also reduce other air emissions) at Bensenville Yard.	Complete.
31	Air Quality and Climate Change	VM-Air-04. The Applicants will comply with U.S. Environmental Protection Agency (EPA) emissions standards for diesel-electric railroad locomotives when purchasing and rebuilding locomotives.	CPKC did not take possession of any new locomotives during the reporting quarter. CPKC also did not receive back any locomotive from rebuilding during the reporting quarter, nor did it send away any locomotive for rebuilding during the reporting quarter.
32	Air Quality and Climate Change	VM-Air-05. The Applicants will develop an anti-idling policy for use in potentially affected communities on the combined network. The policy will capture both idling of construction equipment used on the Capital Improvement Projects as well as ongoing operations.	On February 29 th , CPKC issued a company-wide Anti-Idling Policy which applies to all non-locomotive combustion engines (locomotive idling is subject to the respective operating rules and regulations of Canada, the United States, and Mexico. In the United States this is governed by CPKC General Operating Instruction 45.4). This mitigation measure is now complete.
33	Air Quality and Climate Change	VM-Air-06. To minimize fugitive dust emissions created during the construction of the Capital Improvement Projects, the Applicants will implement appropriate fugitive dust suppression controls, such as spraying water or other approved measures.	To prevent fugitive dust emissions, the construction contractors have monitored dusting conditions and applied dust control measures, such as site watering, as required.
34	Air Quality and Climate Change	VM-Air-07. The Applicants will work with the contractors selected to construct the Capital Improvement Projects to make sure that construction equipment is properly maintained and that mufflers and other required pollution-control devices are in working condition in order to limit construction-related air emissions.	CPKC continues to work with all construction contractors selected for the Capital Improvement Projects to ensure that all of their equipment is properly maintained, and that mufflers and other required pollution control devices are in proper working order.
35	Air Quality and Climate Change	VM-Air-08. Where vegetation clearing has taken place during the construction of the Capital Improvement Projects, the Applicants will begin revegetation as soon as practicable to minimize impacts of wind erosion and fugitive dust. Where immediate revegetation is not practicable, the Applicants will implement alternative stabilization measures such as matting, mulching, or hydroseeding.	CPKC's contractors are implementing measures to minimize wind erosion and fugitive dust. As part of the final site stabilization following completion of track construction, the contractors are applying matting, mulch and/or hydroseed.
36	Cultural Resources	MM-Cultural-01. Prior to beginning any construction activities related to the 25 planned capital improvements, the Applicants shall prepare a construction monitoring plan that addresses the following:	Complete.

Measure Number	Mitigation Category	Voluntary/Mitigation Measure	Compliance Activity
		• <i>Training procedures to familiarize construction personnel with the identification and appropriate treatment of historic properties;</i> • <i>Monitoring of construction activities by a qualified professional archaeologist;</i> • <i>Provisions for monitoring and coordination for work within tribal reservation boundaries;</i> • <i>Provisions for the unanticipated discovery of archaeological sites or associated artifacts during construction activities, including procedures for notifying OEA and the appropriate State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Officer (THPO), pursuant to 36 C.F.R. § 800.13(b) in the event of an unanticipated discovery; and</i> • <i>Provisions for complying with the Native American Graves Protection and Repatriation Act (25 U.S.C. § 3001-3013) and other applicable federal, state, and local laws and regulations in the event of inadvertent discoveries of an unanticipated discovery of unmarked human remains during construction activities.</i> <i>The Applicants shall provide the construction monitoring plan to OEA and appropriate THPOs for review no later than 30 days prior to the start of any construction activities related to the 25 planned capital improvements and shall abide by the provisions of the plan, including any revisions by OEA and appropriate THPOs, during construction activities.</i>	
37	Cultural Resources	MM-Cultural-02. <i>The Applicants shall abide by their commitments to design and engineer the 25 planned capital improvements to remain within existing rail ROW, to maintain the existing rail footprint in locations immediately adjacent to archaeological sites that OEA has identified as eligible for listing on the National Register, and to not perform any construction activities related to the 25 planned capital improvements within the boundaries of National Register-eligible archeological sites identified by OEA.</i>	CPKC continues to abide by the commitment to design and engineer the 25 planned capital improvements so as to maintain the existing rail footprint in locations immediately adjacent to archaeological and historical sites which the OEA has identified as eligible for listing on the National Register.
38	Hazardous Material Release Sites	VM-Haz. Material Sites-01. <i>The Applicants will require its construction contractor(s) to implement measures to protect workers' health and safety and the environment in the event that undocumented hazardous material are encountered during construction of the Capital Improvement Projects. The Applicants will document all activities associated with the previously undocumented contamination and will notify the appropriate state agencies according to applicable regulations. The Applicants will use disposal methods which comply with applicable solid and hazardous waste regulations.</i>	CPKC's contractors have included measures in their Health and Safety Plans to protect workers in the event previously undocumented hazardous materials are discovered.

Measure Number	Mitigation Category	Voluntary/Mitigation Measure	Compliance Activity
39	Hazardous Material Release Sites	VM-Haz. Material Sites-02. Prior to the start of construction for each Capital Improvement Project, the Applicants will develop a site-specific spill prevention, control and response plan. This plan will specify measures to prevent the release of petroleum products or other hazardous materials during construction activities and contain such discharges if they occur.	Prior to the start of construction, CPKC's contractors have developed site specific spill prevention, control and response plans.
40	Hazardous Material Release Sites	VM-Haz. Material Sites-03. In the event of a spill over the applicable reportable quantity during the construction of a Capital Improvement Project, the Applicants will comply with its site-specific spill prevention, control and response plan and applicable federal and state regulations pertaining to spill containment, appropriate clean-up, and notifications.	There were no reportable spills at the Capital Siding Improvement Projects during the reporting period.
41	Hazardous Material Release Sites	VM-Haz. Material Sites-04. During the construction of the Capital Improvement Projects, the Applicants will ensure that gasoline, diesel fuel, oil, lubricants, and other petroleum products are handled and stored to reduce the risk of spills contaminating soils or surface waters. If a petroleum spill occurs as a result of construction, and exceeds specific quantities or enters a waterbody, the Applicants (or its agents) will be responsible for promptly cleaning up the spill and notifying responsible agencies in accordance with federal and state regulations.	All petroleum products on site are properly stored and this is inspected daily by each site's respective environmental monitor.
42	Hazardous Material Release Sites	VM-Haz. Material Sites-05. The Applicants will require contractors to dispose of waste generated on the Capital Improvement Projects in accordance with all applicable federal, state, and local regulations.	All waste generated on site at the Capital Improvement Projects under construction was disposed of in accordance with applicable laws and regulations.
43	Hazardous Material Release Sites	MM-Haz Material Sites-01. The Applicants shall notify EPA prior to undertaking any capital improvements related to the acquisition within the EPA Orongo-Duenweg Mining Belt Superfund site.	CPKC will notify the EPA prior to beginning construction on the Asbury Siding Extension.
44	Hazardous Material Release Sites	MM-Haz Material Sites-02. The Applicants shall notify the Iowa Department of Natural Resources prior to undertaking any capital improvements related to the acquisition that could affect the Archer Daniels Midland Corn Processing Facility Industrial Waste Landfill near the Camanche, Iowa site.	Complete.
N/A	Hazardous Material Release Sites	MM-Haz Material Sites-03. Appendix C of the Board's Decision approving, with conditions, CP acquisition of KCS did not contain a Mitigation Measure with this label.	N/A

Measure Number	Mitigation Category	Voluntary/Mitigation Measure	Compliance Activity
45	Hazardous Material Release Sites	MM-Haz Material Sites-04. <i>The Applicants shall use established standards for recycling or reuse of construction materials, such as ballast and rail ties, during the construction of capital improvements related to the acquisition. When recycling construction materials is not a viable operation, the Applicants shall use disposal methods that comply with applicable solid and hazardous waste regulations.</i>	No used ballast or rail ties were generated at the Capital Improvement Projects during the reporting quarter and thus none were reused.
46	Hazardous Material Release Sites	MM-Haz Material Sites-05. <i>For capital improvements related to the acquisition, the Applicants shall follow American Society of Testing and Materials E1527-05, Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process in areas where potential contamination could be encountered. If the Applicants encounter contamination (or signs of potential contamination) during these activities, Applicants shall perform a Phase 2 environmental investigation. Should findings of a Phase 2 environmental investigation identify contamination in soil and/or groundwater, the Applicants shall coordinate with relevant state agencies on regulatory obligations and comply with those agencies' reasonable requirements for avoiding impacts related to soil and/or groundwater contamination.</i>	Complete.
47	Biological Resources	VM-Biological-01. <i>In alignment with CP's Environmental Policy, the Applicants commit to implementing methods to promote No Net Loss of sensitive habitats (e.g., aquatic areas, wetlands, riparian areas, native prairie, old growth forest) when constructing the Capital Improvement Projects.</i>	CPKC continues to implement methods to promote No Net Loss of sensitive habitats on the Capital Improvement Projects.
48	Biological Resources	VM-Biological-02. <i>Where practicable, the Applicants will clear vegetation in preparation for the Capital Improvement Projects before or after the breeding bird nesting season, specific to each project location, to avoid inadvertent removal of active nests (nesting adults, young, or eggs) and to ensure compliance with the Migratory Bird Treaty Act. If clearing is required during a respective location's nesting season, the Applicants will consult with OEA and the local office of the U.S. Fish and Wildlife Service (USFWS) on appropriate nest survey methods for that area.</i>	CPKC continued tree and brush clearing during the quarter ensuring compliance with the Migratory Bird Treaty Act.

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49	Biological Resources	VM-Biological-03. <i>The Applicants will not conduct construction related tree removal for the Capital Improvement Projects during the active season for the Indiana bat and the northern long-eared bat (April 1 to October 31).</i>	CPKC completed tree felling for the 2024 Capital Improvement Projects, ensuring it was completed outside of the active season for the Indiana bat and northern long-eared bat.
50	Biological Resources	VM-Biological-04. <i>During the construction of the Capital Improvement Projects, the Applicants will take steps to reduce the unnecessary removal of bat habitat outside of active bat season by limiting tree removal to only the areas necessary to safely construct and operate the new siding or second track, marking the limits of tree clearing through the use of flagging or fencing, and ensuring that construction contractors understand clearing limits and how they are marked in the field.</i>	Prior to the clearing of trees, surveyors clearly flagged clearing limits to ensure that there was no unnecessary removal of bat habitat.
51	Biological Resources	VM-Biological-05. <i>If construction of the Capital Improvement Projects would require removal or alteration of bridges, culverts, or other structures that provide suitable habitat for the northern long-eared bat or the Indiana bat during the active season for those species (April 1 to October 31), the Applicants will first conduct an inspection for the presence of, or evidence of use by, bats. The inspection will be completed by a qualified biologist. If the inspection finds bats or evidence of bats, then the Applicants will not commence work on the structure until coordinating with OEA and USFWS to determine appropriate follow-up or mitigative actions. The inspection must be completed during the same year that the work takes place.</i>	Prior to altering or removing any bridge or culvert on the Capital Improvement Projects, a qualified biologist completed an inspection for bats. No signs of roosting or use by bats were observed.
52	Biological Resources	VM-Biological-06. <i>Where practicable, the Applicants will conduct any culvert or bridge removal as part of the Capital Improvement Projects outside of the roosting period of bat species, specific to each project location. Where practicable, if bridge or culvert removal is required during the bat roosting period where the individual Capital Improvement Project is located, the Applicants will consult with OEA and the local USFWS office on appropriate methods to determine if bats are using the bridge or culvert as a roost.</i>	The current reporting period is outside the roosting period for bats. Prior to altering or removing any bridge or culvert on the Capital Improvement Projects, a qualified biologist completed an inspection for bats using the approved methodology. No signs of roosting or use by bats were observed.
53	Biological Resources	VM-Biological-07. <i>During construction of the Capital Improvement Projects, the Applicants will direct any temporary lighting away from suitable habitat for the northern long-eared bat or the Indiana bat during the active season for those species (April 1 to October 31). The Applicants will use downward-facing, full cut-off lens lights for any</i>	All temporary lighting used during the quarter was downfacing with full cutoff lenses and aimed away from suitable bat habitat.

Measure Number	Mitigation Category	Voluntary/Mitigation Measure	Compliance Activity
		<i>temporary lighting used during the construction of the Capital Improvement Projects.</i>	
54	Biological Resources	VM-Biological-08. <i>If the Capital Improvement Projects would involve installing any new, or replacing any existing, permanent lights, the Applicants will use downward facing, full cut-off lens lights (with the same intensity or less for replacement lighting).</i>	None of the Capital Improvement Projects have been designed with permanent lighting.
55	Biological Resources	VM-Biological-09. <i>During construction of the Capital Improvement Projects, temporary barricades, fencing, and/or flagging will be used in sensitive habitats to contain construction related impacts to the area within the construction ROW. To the extent possible, staging areas will be located in previously disturbed sites and not in sensitive habitat areas.</i>	Sensitive habitats, such as wetlands, were flagged on site. The environmental monitors at each of the Capital Improvement Projects are working with the respective contractors to ensure that staging areas are not in sensitive habitat areas.
56	Biological Resources	VM-Biological-10. <i>The Applicants will limit ground disturbance to only the areas necessary for the construction of the Capital Improvement Projects.</i>	The contractor is limiting ground disturbance to only the areas necessary for the construction of the Capital Improvement Projects.
57	Biological Resources	VM-Biological-11. <i>The Applicants will use construction methods and seed mixes that minimize introduction and spread of noxious weeds on the Capital Improvement Projects. Noxious weed control will include combinations of mechanical and herbicide spray methods.</i>	The seed applied during the reporting period was purchased from local seed suppliers and came with seed inspection tags certifying it as weed free. Noxious weed control was not required during the reporting period at the Capital Improvement Projects under construction.
58	Biological Resources	VM-Biological-12. <i>The Applicants will ensure that any herbicides used in ROW maintenance to control vegetation are approved by EPA and are applied by licensed individuals who will limit application to the extent necessary for safe rail operations. Herbicides will be applied so as to prevent or minimize drift off of the ROW onto adjacent areas.</i>	CPKC confirms all herbicide used in the reporting period was approved by the EPA and applied by licensed applicators. CPKC did not receive any reports of overspray or herbicide drift impacting areas adjacent to the ROW.
59	Biological Resources	VM-Biological-13. <i>As applicable to each of the individual Capital Improvement Projects, the Applicants will protect bald and golden eagles by adhering to the Bald and Golden Eagle Protection Act. In addition, the Applicants will follow the USFWS National Bald Eagle Management Guidelines, as applicable.</i>	No new eagle nests were observed at the Capital Improvement Project sites. CPKC previously reported on, and removed under permit, an Eagle nest at the Dawn siding project.
60	Biological Resources	MM-Biological-01. <i>For capital improvements related to the acquisition, the Applicants shall not knowingly include any federally- or state-listed</i>	The seed applied during the reporting period was purchased from local seed suppliers and came with seed inspection tags certifying it as weed free.

Measure Number	Mitigation Category	Voluntary/Mitigation Measure	Compliance Activity
		<i>invasive weed species in seed mixes for revegetating disturbed areas within the rail ROW.</i>	
61	Biological Resources	MM-Biological-02. <i>During final design and engineering of capital improvement projects related to the acquisition, the Applicants shall reexamine the USFWS list of threatened or endangered species. If the list has changed to include newly listed species or newly designated critical habitat, or if new information reveals that listed species or critical habitat could be affected by the capital improvements, the Applicants shall consult with OEA and USFWS regarding avoidance, minimization, and mitigation measures and shall implement the measures developed in consultation with OEA and USFWS.</i>	During the final design of the Capital Improvement Projects, CPKC continues to reexamine the USFWS list of Threatened and Endangered Species and designated critical habitat and to consider whether any new information reveals that listed species could be affected. In addition, federal agencies that have permitting jurisdiction over any of the Capital Improvement Projects will oversee compliance with the Endangered Species Act.
62	Biological Resources	MM-Biological-03. <i>The Applicants shall apply the mitigation measures identified in VM Biological-03, VM-Biological-04, VM-Biological-05, VM-Biological-06 and VM Biological-07 to any planned capital improvements potentially affecting the habitat of the Tricolored bat, which USFWS has proposed for listing as Endangered.</i>	The listed mitigation measures were applied for the protection of Tricolored Bat in addition to the Indiana Bat and Northern Long-eared Bat.
63	Biological Resources	MM-Biological-04. <i>The Applicants shall implement Special Protective Measures and karst Best Management Practices if the construction of the planned capital improvements occurs in areas with karst features in Benton County, Arkansas and McDonald County, Missouri, to avoid potentially affecting the endangered Benton County Cave Crayfish, Hell Creek Cave Crayfish, and Ozark Cavefish.</i>	Complete.
64	Water Resources	VM-Water-01. <i>The Applicants commit to remaining compliant with 33 C.F.R. Part 117 Drawbridge Operation Regulations.</i>	During the reporting period, CPKC complied with all applicable US Coast Guard regulations and did not receive any Notices of Violation and accompanying fine from the USCG related to the operation of drawbridges.
65	Water Resources	VM-Water-02. <i>As applicable for each of the Capital Improvement Projects, the Applicants will request Clean Water Act Water Quality Certification from the jurisdiction where the respective project is located.</i>	CPKC has requested Clean Water Act Water Quality Certification from the respective jurisdictions for all the Capital Improvement Projects under construction.
66	Water Resources	VM-Water-03. <i>As applicable for each of the individual Capital Improvement Projects, the Applicants will obtain an authorization from the U.S. Army Corps of Engineers (USACE) under Section 404 of the Clean Water Act before initiating project-related construction activities in jurisdictional waters of the U.S.</i>	As applicable, CPKC has obtained authorization under Section 404 of the Clean Water Act prior to initiating project-related construction activities in jurisdictional waters of the US.

Measure Number	Mitigation Category	Voluntary/Mitigation Measure	Compliance Activity
67	Water Resources	VM-Water-04. <i>As applicable to each of the individual Capital Improvement Projects, the Applicants will require its construction contractor(s) to follow all water quality control conditions identified in all permits including the Water Quality Certification from the respective jurisdiction and Section 404 Permits issued by USACE.</i>	The environmental monitor onsite daily at the respective Capital Improvement Projects under construction is ensuring the contractors comply with all applicable permit conditions.
68	Water Resources	VM-Water-05. <i>Prior to initiating construction at a Capital Improvement Project location, the Applicants will develop a site-specific Stormwater Pollution Prevention Plan which will incorporate Best Management Practices as well as site specific measures to control erosion and reduce the amount of sediment and pollutants entering surface waters, ground waters, and waters of the U.S.</i>	Prior to initiating construction at the Capital Improvement Projects, CPKC is ensuring that a site specific SWPPP is in place.
69	Water Resources	VM-Water-06. <i>For Capital Improvement Project locations which will involve construction activities in proximity to surface water, prior to the start of construction the Docket No. FD 36500 et al. 209 Applicants will develop a site-specific water quality monitoring plan and implement this monitoring plan throughout construction.</i>	For construction in proximity to surface waters, CPKC is ensuring a site-specific water quality monitoring plan is in place. Throughout the construction, the environmental monitor at each respective construction site has been implementing the respective water quality monitoring plan.
70	Water Resources	VM-Water-07. <i>The Applicants will minimize impacts to wetlands where practicable in the final design of the individual Capital Improvement Projects. Applicants agree to compensate for the loss of any wetlands through any one, or a combination of: purchasing credits from an authorized wetland mitigation bank, restoring a previously existing wetland or other aquatic site, enhancing an existing aquatic site's function, preserving an existing aquatic site, and/or creating a new aquatic site.</i>	CPKC continues to minimize impacts to wetlands where practicable and to offset the loss of wetland habitat through the purchase of wetland credits or other means.
71	Water Resources	VM-Water-08. <i>The Applicants will design all Capital Improvement Project drainage crossing structures to pass a 100-year storm event.</i>	CPKC continues to design all of the Capital Improvement Projects to pass a 1:100 year storm event.
72	Water Resources	VM-Water-09. <i>The Applicants will consider the passage of aquatic organisms in the design of culverts and bridges required for the Capital Improvement Projects, where practicable.</i>	As applicable to each respective Capital Improvement Project, the passage of aquatic organisms is being considered in the design of culverts and bridges.
73	Water Resources	VM-Water-10. <i>As applicable to each of the individual Capital Improvement Projects, the Applicants will comply with applicable in-water work windows and timing restrictions for the protection of fish species.</i>	In-water work is being scheduled at the Capital Improvement Projects to protect fish species as applicable to each respective site.
74	Water Resources	VM-Water-11. <i>During the construction of Capital Improvement Projects, the Applicants will require all contractors to conduct daily inspections of all equipment for any fuel, lube oil, hydraulic or</i>	The contractors are completing daily equipment inspections at each of the Capital Improvement Projects under construction.

Measure Number	Mitigation Category	Voluntary/Mitigation Measure	Compliance Activity
		<i>antifreeze leaks. If leaks are found, the Applicants will require the contractor to immediately remove the equipment from service and repair or replace it.</i>	
75	Water Resources	VM-Water-12. <i>During the construction of the Capital Improvement Projects, the Applicants will prohibit construction vehicles from driving in or crossing streams at other than established crossing points.</i>	The environmental monitors at each of the respective Capital Improvement Project construction sites are ensuring that the contractors are only crossing watercourses at established crossing points.
76	Water Resources	VM-Water-13. <i>During the construction of the Capital Improvement Projects, the Applicants will take reasonable steps to ensure contractors use fill material appropriate for the project area.</i>	The contractor is complying with the engineering design for each of the respective Capital Improvement Projects including the material specifications for each site (which have been designed by a Professional Engineer to ensure they are appropriate for that respective site).
77	Water Resources	MM-Water-01. <i>During the final engineering and design of the 25 capital improvements, the Applicants shall design culverts and bridges so as to maintain existing surface water drainage patterns to the extent practicable and not cause or exacerbate flooding.</i>	CPKC continues to design all culverts and bridges so as to maintain surface water drainage patterns and not cause or exacerbate flooding.
78	Water Resources	MM-Water-02. <i>The Applicants shall coordinate with the Federal Emergency Management Agency if construction of bridges, culverts, or embankments related to the 25 planned capital improvements would result in an unavoidable increase greater than 1 foot to the 100-year water surface elevations.</i>	CPKC continues to design the Capital Improvement Projects to ensure that any rise in the 100-year water surface elevation is one foot or less.
79	Water Resources	MM-Water-03. <i>The Applicants shall obtain and comply with National Pollutant Discharge Elimination System (NPDES) permits for storm water discharges resulting from project-related construction activities at each of the capital improvements that meet the requirements for a NPDES.</i>	CPKC has ensured NPDES permit coverage is in place prior to the start of civil construction on the Capital Improvement Projects which have commenced construction.
80	Environmental Justice	VM-EJ-01. <i>The Applicants will use CP's experience building relationships with First Nations in Canada to engage with federally recognized Indian tribes in the U.S.</i>	On February 29, CPKC discussed employee recruitment with the United Keetoowah Band of Cherokees. On March 8, CPKC contributed funding to a United Keetoowah Band of Cherokees softball tournament in Tahlequah, OK. On March 14, CPKC and White Earth Nation confirmed the next engagement table meeting.
81	Environmental Justice	VM-EJ-02. <i>The Applicants will make Operation Lifesaver programs available to potentially affected communities, including schools and other organizations (Operation Lifesaver is a non-profit education and awareness program that helps increase the public's awareness of the dangers around rail lines).</i>	During the reporting period, CPKC Police Officers and other CPKC Employees completed 42 Operation Lifesaver and other training events. These included training for Law Enforcement partners, and safety presentations to primary and high school groups, driving schools and the general public.

Measure Number	Mitigation Category	Voluntary/Mitigation Measure	Compliance Activity
82	Environmental Justice	VM-EJ-03. For the construction contracts for the Capital Improvement Projects, the Applicants commit to allocate a minimum of 15% of contractor bid evaluation weighting to the inclusion of minority and tribal owned businesses and employees on the proposed project team.	CPKC continues to allocate a minimum of 15% in evaluation of contractor bids for the prospective contractor’s inclusion of minority and tribal owned businesses and employees.
83	Environmental Justice	MM-EJ-01. The Applicants shall conduct proactive and targeted outreach to minority and low-income communities that would experience adverse noise impacts as a result of the acquisition to provide information about the process for establishing Quiet Zones. The Applicants shall assist interested communities in identifying supplemental or alternative safety measures, practical operational methods, or technologies that may enable the community to establish Quiet Zones in accordance with FRA’s final rule on the “Use of Locomotive Horns at Highway-Rail Grade Crossings.”	CPKC is engaged with minority and low-income communities that are interested in or in the process of inquiring or applying for quiet zones.
84	Community Agreements and Coordination	VM-Community-01. The Applicants commit that the new CPKC will meet regularly with community representatives in the Houston area. If those communities experience merger-related impacts, CPKC will work with them on ways to address their concerns. CPKC will also participate alongside other railroads serving Houston—notwithstanding that it will own no track there—to work cooperatively with communities to address the impacts of rail operations in the region.	CPKC representatives continue to work with community representatives in the Houston area. CPKC representatives have attended multiple Greater Houston Partnership events in the last quarter, as well as regularly attending Houston Area Rail Transformation (HART) meetings and Gulf Coast Rail District meetings. CPKC representatives have also met with local elected officials, including members of the City Council.
85	Community Agreements and Coordination	VM-Community-02. The Applicants will provide community leaders in Houston with ways to report issues. CP has a “Community Connect” webpage that provides contact information, answers frequently asked questions, and offers other resources that will remain active for the new CPKC system. CP also has a Public Safety Communication Centre that operates 24 hours a day, 365 days a year with trained communication officers who can be reached toll-free at 1-800-716-9132. Calls into that Centre, which includes the Community Connect line and CP’s emergency lines, are tracked using sophisticated Computer Aided Dispatch (CAD) software. The communication officers in this Centre are trained to handle a range of issues, from a blocked crossing to a trespasser, and they regularly coordinate the involvement of other railroads as required for any specific incident.	CPKC has communicated the different ways to reach CPKC to Houston area community leaders. CPKC didn’t received any calls to the Community Connect line from the Houston area during the reporting period, and it passed on notification of two incidents to Union Pacific through the Public Safety Communications Center.
86	Community Agreements and Coordination	VM-Community-03. The Applicants will work with certain Chicago area communities with which they have not been able to reach agreements—DuPage County, the Village of Bartlett, the Village of Bensenville, the City of Elgin, the Village of Itasca, the Village of Hanover Park, the Village of Roselle, the City of Wood Dale, and the Village of Schaumburg—to mitigate potential acquisition-related	On January 12, CPKC met with FRA Chicago regional officials to provide a technical update regarding LinQThingz, the vendor installing and maintaining many of the Chicago mitigation measures. On February 14, CPKC participated in our recurring meeting with the Illinois Commerce Commission and the Illinois Department of Transportation to

Measure Number	Mitigation Category	Voluntary/Mitigation Measure	Compliance Activity
		environmental impacts. Specifically, they will work with them to accomplish: • Subject to necessary FRA approvals and practicability, funding efforts towards the creation and implementation of quiet zones, including the costs of installation. • Installing and funding a predictive mobility system, interconnected with existing railroad crossing signals, that will deliver advanced notice of blocked crossings to citizens, police, fire, and rescue operations, and others. • Installing and funding ITS Interconnect for Advanced Warning Signs at strategic locations to give drivers information about occupied crossings, allowing them to make better on-the-spot decisions. • Installing and funding Positive Train Control wireless technology tie-ins at crossings adjacent to Metra platforms, which will minimize the activation of crossing lights and gates. With respect to the work described above, the Applicants anticipate that the Applicants or their subcontractors will perform the work. In the case of instances where work may be performed by others, the Applicants would reimburse reasonable and customary charges for such work. Because Metra owns the trackage that CP uses in these communities, Metra would have to approve the implementation of these mitigation measures. The Applicants would work with Metra, the communities, and any other relevant agencies to seek approvals.	review possible crossing safety improvements and Chicago mitigation measure implementation. Of note, CPKC highlighted the desire of the Village of Bensenville to seek a grade separation at York Rd and CPKC connected Bensenville with the ICC/IDOT to explore funding options for initial engineering, planning and environmental review. CPKC representatives have been scheduling technical meetings on quiet zones as well as ones for the predictive mobility system and advanced warning signs between its vendor, LinqThingz, and communities. During the reporting period, CPKC held meetings on the following dates: - on February 22, CPKC coordinated an Elgin QZ process launch between its engineering firm and the city; - on February 28, CPKC held a technical meeting with Bartlett; - on March 11 CPKC held a technical meeting with Roselle and a site survey meeting to review sensor placement; - on March 12, CPKC provided a scope of work & reimbursement agreement to METRA to support established of a QZ in Roselle, IL, CPKC is currently awaiting feedback from METRA on these items to advance the project; - on March 18, CPKC held a site survey meeting with LinqThingz and Bartlet for sensor placement; - on March 21, CPKC-Stop CPKC Coalition Meeting to review status of various merger mitigation measures; - on April 2, CPKC held a site survey meeting with LinqThingz and Bensenville for sensor placement; and, - on April 3, CPKC-LinqThingz-Itasca Technical & Site Survey meeting to review sensor placement. In addition to the above engagements, CPKC representatives have met with coalition communities numerous times to address concerns raised and with other state stakeholders to ensure an open line of communication to stakeholders.
87	Community Agreements and Coordination	MM-Community-01. The Applicants shall comply with the terms of the agreements reached between the Applicants and the City of Davenport, Iowa; the City of Bettendorf, Iowa; the City of Muscatine, Iowa; the City of LeClaire, Iowa; the City of Clinton, Iowa; the City of Washington, Iowa; the City of Fruitland, Iowa; the Village of Hampshire, Illinois; the Village of Pingree Grove, Illinois; and the City of Liberty, Missouri.	CPKC continues to work with each community to comply with the terms of the agreements reached and remain engaged and focused on ensuring an open dialogue.
88	Community Agreements and Coordination	MM-Community-02. If Applicants reach additional agreements with communities or other entities following publication of this Final EIS, the	No additional agreements were reached this quarter.

Measure Number	Mitigation Category	Voluntary/Mitigation Measure	Compliance Activity
		<i>Applicants shall notify the Board, and the Board will impose a condition that requires the Applicants to comply with the terms of the agreement.</i>	
89	Community Agreements and Coordination	MM-Community-03. <i>To facilitate compliance with VM-Community-01 and VM Community-02, the Applicants shall establish a Community Liaison to consult with Houston area community leaders. The Community Liaison shall be available for public meetings and to conduct periodic outreach to mayors and appropriate local officials. The Applicants shall establish and staff the Community Liaison position for a period of seven years following the Board's final decision authorizing the acquisition. The Applicants shall provide the name, telephone number, and email address of the Community Liaison to the Houston mayor and Harris County officials.</i>	Andy Cummings continues to serve as CPKC's Community Liaison for the Houston Area.
90	Community Agreements and Coordination	MM-Community-04. <i>To facilitate compliance with VM-Community-03, the Applicants shall establish a Community Liaison to consult with leaders of Chicago area communities referenced in that mitigation measure (the Village of Itasca, the Village of Bensenville, the City of Wood Dale, the Village of Roselle, the Village of Schaumburg, the Village of Hanover Park, the Village of Bartlett, the City of Elgin, and DuPage County). The Community Liaison shall be available for public meetings and to conduct periodic outreach to mayors and appropriate local officials. The Applicants shall establish and staff the Community Liaison position for a period of seven years following the approval of the acquisition. The Applicants shall provide the name, telephone number, and email address of the Community Liaison to mayors and other appropriate local officials in each community listed above.</i>	Larry Lloyd continues to serve as CPKC's Community Liaison for the Chicago Area.

CPKC Capital Improvement Project Updates

Turkey River, IA – New Siding

In this reporting period, CPKC completed permitting, tree clearing, and prepared for civil construction in 2024.

Bellevue, IA – New Siding

In this reporting period, CPKC continued construction on the new siding at Bellevue.

CPKC has an environmental monitor on site full time during civil construction activities. No non-compliances with the construction related mitigation measures were observed during the reporting period.

CPKC had an archaeological monitor on site full time during ground disturbing activities which were completed on January 11. The final archaeological monitoring report is appended.

Monroe, IL – New Siding

In this reporting period, CPKC continued construction on the new siding at Monroe.

CPKC has an environmental monitor on site full time during civil construction activities. No non-compliances with the construction related mitigation measures were observed during the reporting period.

CPKC has an archaeological monitor on site full time during ground disturbing activities. There were no significant archaeological or historical finds at the project site during the reporting period. There were a number of isolated historic artifacts, consistent with the corridor's railroad history observed. These will be discussed in more detail in the final archaeological monitoring report.

Deer Creek, IA – Siding Extension

In this reporting period, CPKC continued construction on the siding extension at Deer Creek.

CPKC has an environmental monitor on site full time during civil construction activities. No non-compliances with the construction related mitigation measures were observed during the reporting period.

CPKC had an archaeological monitor on site full time during ground disturbing activities which were completed on December 2. The final archaeological monitoring report is appended.

Camanche, IA – Siding Extension

In this reporting period, CPKC completed permitting and prepared for construction in 2024.

Letts, IA – Siding Extension

In this reporting period, CPKC did not undertake any work on the proposed Letts Siding extension.

Washington, IA – New Siding

In this reporting period, CPKC continued construction on the new siding at Washington.

CPKC has an environmental monitor on site full time during civil construction activities. No non-compliances with the construction related mitigation measures were observed during the reporting period.

CPKC had an archaeological monitor on site full time during ground disturbing activities which were completed on December 6. The final archaeological monitoring report is appended.

Ottumwa, IA – Siding Extension

In this reporting period, CPKC did not undertake any work on the proposed Ottumwa Siding extension.

Moravia, IA – New Siding

In this reporting period, CPKC progressed design and permitting work on the proposed siding.

Newtown, MO – Siding Extension

As CPKC reported in Quarterly Compliance Report 2, the Newtown Siding Extension is complete.

Laredo, MO – Siding Extension

As CPKC reported in the Quarterly Compliance Report 3, the Laredo Siding Extension is complete.

Dawn, MO – New Siding

In this reporting period, CPKC prepared for civil construction in 2024.

Blue Valley, MO – New Double Track

In this reporting period, CPKC progressed design and permitting work on the proposed double track.

Additionally, given the three grade separated road crossings within the project area and the proximity a Union Pacific mainline, CPKC has been involved in discussions with the local road authority as well as UP.

Grandview, MO – New Facility Working Tracks

In this reporting period, CPKC completed the design work for a switch reconfiguration and signal system upgrades.

Asbury, MO – Siding Extension

In this reporting period, CPKC progressed design and environmental permitting work on the proposed Asbury Siding extension. No physical construction was undertaken at this site.

Goodman, MO – New Siding

In this reporting period, CPKC progressed design and environmental permitting work on the proposed Goodman Siding. No physical construction was undertaken at this site.

Gentry, AR – Siding Extension

In this reporting period, CPKC progressed design and environmental permitting work on the proposed Gentry Siding extension. No physical construction was undertaken at this site.

Baron, OK – New Siding

In this reporting period, CPKC progressed design and environmental permitting work on the proposed new Baron Siding. No physical construction was undertaken at this site.

Cave Springs, AR – Siding Extension

In this reporting period, CPKC progressed design and environmental permitting work on the proposed Cave Springs Siding extension. No physical construction was undertaken at this site.

Spiro, OK – Siding Extension

In this reporting period, CPKC continued construction on the siding extension at Spiro.

CPKC has an environmental monitor on site full time during civil construction activities. No non-compliances with the construction related mitigation measures were observed during the reporting period.

CPKC has an archaeological monitor on site full time during ground disturbing activities which were completed on November 16. The final archaeological monitoring report is appended.

Heavener, OK – Siding Extension

In this reporting period, CPKC progressed design and permitting based on the minor alignment changes to reduce project impacts, as communicated to the OEA by separate letter on October 26th. No physical construction was undertaken at this site.

Mena, AR – New Siding

In this reporting period, CPKC progressed design and environmental permitting work on the proposed new Mena Siding. No physical construction was undertaken at this site.

Mansfield, LA – Siding Extension

As CPKC reported in Quarterly Compliance Report 3, the Mansfield Siding Extension is complete.

Loring, LA – Siding Extension

In this reporting period, CPKC completed tree clearing on the additional property obtained (immediately adjacent to the existing Right-of-Way) to accommodate the width of the embankment and prepared for civil construction in 2024.

Singer, LA – Siding Extension

In this reporting period, CPKC initiated construction on the siding extension at Singer.

CPKC has an environmental monitor on site full time during civil construction activities. No non-compliances with the construction related mitigation measures were observed during the reporting period.

CPKC has an archaeological monitor on site full time during ground disturbing activities. There were no archaeological or historical finds at the project site during the reporting period.

TECHNICAL MEMORANDUM

To: Michael Keller
HDR, Inc.
michael.keller@hdrinc.com

From: Jolene Schleicher, Project Manager
Matthew Hull, Principal Investigator

Date: January 26, 2023

Re: **HDR Rail Monitoring Summary Report, January 2024, Bellevue, Iowa / SWCA Project No. 77801**

PROJECT DESCRIPTION

SWCA Environmental Consultants (SWCA) was contracted by HDR, Inc., to monitor for cultural resources during the construction of capital improvements along the Canadian Pacific and Kansas City Southern rail right-of-way. These capital improvements consist of extending 13 existing sidings, adding 10 new passing sidings, adding one new section of facility working track, and adding one new section of double track (project). The project is taking place in various locations. This summary report for the Bellevue, Iowa, project area (project area), as required by HDR, Inc., documents the completed cultural resources monitoring activities undertaken by SWCA at this location between May 9, 2023, and January 11, 2024.

SWCA personnel who monitored construction at the Bellevue, Iowa, project area and the construction monitoring dates are summarized in Table 1.

Table 1. Cultural Resource Monitor and Dates of Monitoring at the Bellevue, Iowa, Project Area

SWCA Cultural Resource Monitor	Dates of Construction Monitoring
Phylicia Way	May 9–12 and 15–20, 2023
Tatiana Hargrove	May 22–26, 27, and 30–June 3; and June 15–20, 2023
Matthew Denno	June 5–10 and 12–17, 2023
Wyatt Benson	June 19–23, 26–29; July 5–8, 10–13, 17–22, and 24–28, 2023
Randy Teboe	July 31; August 1–5, 7–12, and 14–17, 2023
Monica Zsigmond	September 6–9, 11–16, 18–23, and 25–30; October 2–7, 9–12, 16–21, 23–28, and 30–31; November 1–3, 6–11, 13–17, 20–21, and 28–30; December 1–2 and 4–22, 2023; and January 3–11, 2024

MONITORING METHODS

SWCA monitoring methods consisted of the visual inspection of ground-disturbing activities, such as bulldozing and scraping, associated with construction. The archaeologist observed soil removal, digging, and drilling activities (Figures 1–10) and monitored for the presence of cultural resources, such as bone, individual artifacts, artifact concentrations, and features. The archaeologist also inspected the surrounding area and soil stockpiles for the presence of cultural resources.

MONITORING SUMMARY

The type of construction activities monitored and the results of monitoring at the Bellevue, Iowa, project area between May 9, 2023, and January 11, 2024, are presented in Table 2. At the beginning of ground disturbance, SWCA’s archaeologist presented a training to construction personnel, providing background as to why archaeology monitoring is being conducted, what the archaeologist is looking for, and what steps are to be taken if cultural resources are identified during construction.

Table 2. Bellevue, Iowa, Project Area Construction Activities and Results

Construction Activities Monitored	Results
Cut and fill grading, stump removal, grubbing, silt fence installation, utility potholing, boring, culvert installation, excavation for burrow pit, sub-ballast foundation installation, drilling for retaining wall construction, bridge installation, and cement pouring.	No features or cultural resources have been identified during the monitoring.

Results

No features or significant cultural materials were identified during the cultural resources monitoring at the Bellevue, Iowa, project location. No known cultural resources have been impacted by construction.

CONCLUSIONS

Between May 9, 2023, and January 11, 2024, SWCA conducted cultural resources monitoring and tasks associated with the Bellevue, Iowa, project area during construction on the project, which commenced on May 9, 2024, and were completed on January 11, 2024. No features or significant cultural materials were identified during the cultural resources monitoring, and no known cultural resources were impacted by construction at the Bellevue, Iowa, project area.



Figure 1. Initial topsoil clearance and stump removal by bulldozer; view facing southwest. (Photograph by Tatiana Hargrove, May 23, 2023.)



Figure 2. Initial stump removal by excavator; view facing northwest. (Photograph by Matthew Denno, June 12, 2023.)



Figure 3. Culvert installation; view facing north. (Photograph by Wyatt Benson, June 21, 2023.)



Figure 4. Topsoil and stump removal; view facing west. (Photograph by Wyatt Benson, July 5, 2023.)



Figure 5. Drilling a hole for the retaining wall; view facing northwest. (Photograph by Randy Teboe, August 11, 2023.)



Figure 6. Preparing to begin driving pylon; view facing east. (Photograph by Monica Zsigmond, September 26, 2023.)



Figure 7. Excavation between pilings, installation of wall panels; view facing northwest. (Photograph by Monica Zsigmond, October 7, 2023.)



Figure 8. Drilling to prepare for pylon installation; view facing southwest. (Photograph by Monica Zsigmond, November 8, 2023.)



Figure 9. Continued excavation from above and below retaining wall; view facing northwest. (Photograph by Monica Zsigmond, December 5, 2023.)



Figure 10. Continued excavation of borrow pit; view facing north. (Photograph by Monica Zsigmond, December 14, 2023.)

TECHNICAL MEMORANDUM

To: Michael Keller
HDR, Inc.
michael.keller@hdrinc.com

From: Jolene Schleicher, Project Manager
Matthew Hull, Principal Investigator

Date: December 21, 2023

Re: **HDR Rail Monitoring Summary Report, December 2023, Deer Creek, Iowa / SWCA Project No. 77801**

PROJECT DESCRIPTION

SWCA Environmental Consultants (SWCA) has been contracted by HDR, Inc. (HDR), to monitor for cultural resources during the construction of capital improvements along the Canadian Pacific and Kansas City Southern rail right-of-way. These capital improvements include extending 13 existing sidings and adding 10 new passing sidings, one new section of facility working track, and one new section of double track (project). The project is taking place in various locations (project areas). This summary report for the Deer Creek, Iowa project area, as required by HDR, documents the completed cultural resources monitoring activities undertaken by SWCA at this location, which occurred between May 15 and was completed on December 2, 2023.

SWCA personnel who monitored construction at the Deer Creek, Iowa project area and the construction monitoring dates are summarized in Table 1.

Table 1. Cultural Resource Monitors and Dates of Monitoring at the Deer Creek, Iowa, Project Area

SWCA Cultural Resource Monitor	Dates of Construction Monitoring
Sam Cohen	May 15–18, 22–25, and 27; May 30–June 3; and June 22–25, 2023
Heather MacIsaac	June 4–10 and 12–15, 2023
Travis Himebaugh	June 19–24; July 5–8, 10–13, 17–20, 24–27, and 31; and August 1–3, 2023
Talia Schade	June 26–29, 2023
Colin Christiansen	September 11–16, 18–22, and 17–20, 2023

SWCA Cultural Resource Monitor	Dates of Construction Monitoring
Sam Peterson	September 25–29; October 2–6, 9–14, 16–20, 23–28, and 30–31; November 1–4, 6–11, 13–18, 20, and 27–30; and December 1–2, 2023

MONITORING METHODS

SWCA monitoring methods consisted of the visual inspection of ground-disturbing activities, such as bulldozing and scraping associated with construction. The archaeologist observed soil removal, digging, and drilling activities (Figures 1–9) and monitored for the presence of cultural resources, such as bone, individual artifacts, artifact concentrations, and features. The archaeologist also inspected the surrounding area and soil stockpiles for the presence of cultural resources.

MONITORING SUMMARY

The type of construction activities monitored and the results of monitoring at the Deer Creek, Iowa, project area between May 15 and December 2, 2023, are presented in Table 2. At the beginning of ground disturbance, SWCA’s archaeologist presented a training to construction personnel, providing background as to why archaeological monitoring is being conducted, what the archaeologist is looking for, and what steps are to be taken if cultural resources are identified during construction.

Table 2. Deer Creek, Iowa Project Location and Cultural Resource Monitors

Construction Activities Monitored	Results
Stump removal; silt fence installation; cut-and-fill grading; construction of a temporary bridge; construction of a ramp over the railroad Bridge abutment and wall installation; construction of a crane platform; silt fence installation, and bridge ballast stone installation, culvert drilling, and rail installation.	No features or cultural resources have been identified during the monitoring.

Results

No features or significant cultural materials were identified during the cultural resources monitoring at the Deer Creek, Iowa project location. No known cultural resources have been impacted by construction.

CONCLUSIONS

Between May 15 and was completed on December 2, 2023, SWCA conducted cultural resources monitoring and tasks associated with the Deer Creek, Iowa project area during construction on the project, which commenced on Mat 15, 2023, and was completed on December 2, 2023. No features or significant cultural materials were identified during the cultural resources monitoring, and no known cultural resources were impacted by construction at the Deer Creek, Iowa project area.



Figure 1. Track hoe laying rock to build up pad for bridge on south bank; view facing south (Photo by S. Cohen May 16, 2023).



Figure 2. Example of turbidity curtains/silt screens set up along Deer Creek on either side of area of potential effects where bridge is being installed around MP 152; view facing south. (Photo by H. MacIsaac June 7, 2023).



Figure 3. Bridge construction progresses toward the end of the workday; view facing south. (Photo by T. Schade June 26, 2023).



Figure 4. Silt fence installation progress; view facing south. (Photo by C. Christiansen September 14, 2023).



Figure 4. Silt fence installation progresses; view facing southeast. (Photo by C. Christiansen September 15, 2023).



Figure 5. Track ballast stone installation progress; view facing north. (Photo by S. Peterson October 27, 2023).



Figure 6. Digging a pit for culvert drilling operations; view facing east. (Photo by S. Peterson November 16, 2023).



Figure 7. Drilling rig preparing to drill the culvert; view facing northeast. (Photo by S. Peterson November 16, 2023).



Figure 8. Rail installation; view facing northeast. (Photo by S. Peterson November 30, 2023).



Figure 9. Rail installation and culvert cleanup; view facing west. (Photo by S. Peterson December 2, 2023).

TECHNICAL MEMORANDUM

To: Michael Keller
HDR, Inc.
michael.keller@hdrinc.com

From: Jolene Schleicher, Project Manager
Matthew Hull, Principal Investigator

Date: December 18, 2023

Re: **HDR Rail Monitoring Summary Report, December 2023, Washington, Iowa / SWCA Project No. 77801**

PROJECT DESCRIPTION

SWCA Environmental Consultants (SWCA) has been contracted by HDR, Inc. (HDR), to monitor for cultural resources during the construction of capital improvements along the Canadian Pacific and Kansas City Southern rail right-of-way. These capital improvements include extending 13 existing sidings and adding 10 new passing sidings, one new section of facility working track, and one new section of double track (project). The project is taking place in various locations (project areas). This summary report for the Washington, Iowa, project area, as required by HDR, documents the completed cultural resources monitoring activities undertaken by SWCA at this location, which occurred between April 22 and December 6, 2023.

SWCA personnel who monitored construction at the Washington, Iowa, project area and the construction monitoring dates are summarized in Table 1.

Table 1. Cultural Resource Monitors and Dates of Monitoring at the Washington, Iowa, Project Area

SWCA Cultural Resource Monitor	Dates of Construction Monitoring
Randy Teboe	April 22–27; May 8–13, 15–20, 22–26, 30–June 3; June 5–10, 12–17, 19–24, 26, and 27–29; and July 9–14, 18–22, and 24–27, 2023
Talia Schade	July 6–8, October 9–12 and 16–21, November 27–30, and December 2, 2023
Sam Peterson	August 30–31, 2023
Sam Cohen	September 5–9, 11–16, and 18–19, 2023
Zach Meskin	October 2–7, 2023

SWCA Cultural Resource Monitor	Dates of Construction Monitoring
Arturo Rivera	October 23–25 and 30–31; and November 1–4, 6–11, 13–18, and 20–21, 2023
Travis Himebaugh	December 4–6, 2023

MONITORING METHODS

SWCA monitoring methods consisted of the visual inspection of ground-disturbing activities, such as bulldozing and scraping associated with construction. The archaeologist observed soil removal, digging, and drilling activities (Figures 1–12) and monitored for the presence of cultural resources, such as bone, individual artifacts, artifact concentrations, and features. The archaeologist also inspected the surrounding area and soil stockpiles for the presence of cultural resources.

MONITORING SUMMARY

The type of construction activities monitored and the results of monitoring at the Washington, Iowa, project area between April 22 and December 6, 2023, are presented in Table 2. At the beginning of ground disturbance, SWCA’s archaeologist presented a training to construction personnel, providing background as to why archaeological monitoring is being conducted, what the archaeologist is looking for, and what steps are to be taken if cultural resources are identified during construction.

Table 2. Washington, Iowa Project Location and Cultural Resource Monitors

Construction Activities Monitored	Results
Cut and fill grading; trenching to remove drain tile and install a new culvert; installation of floating silt fence; trenching; boring operations; excavation for an access road; and drilling for beam installation.	No features or cultural resources were identified during the monitoring.

Results

No features or significant cultural materials were identified during the cultural resources monitoring at the Washington, Iowa project locations. No known cultural resources have been impacted by construction.

CONCLUSIONS

Between April 22 and December 6, 2023, SWCA conducted cultural resources monitoring and tasks associated with the Washington, Iowa, project area during construction on the project, which commenced on April 22, 2023, and was completed on December 6, 2023. No features or significant cultural materials were identified during the cultural resources monitoring, and no known cultural resources were impacted by construction at the Washington, Iowa, project areas.

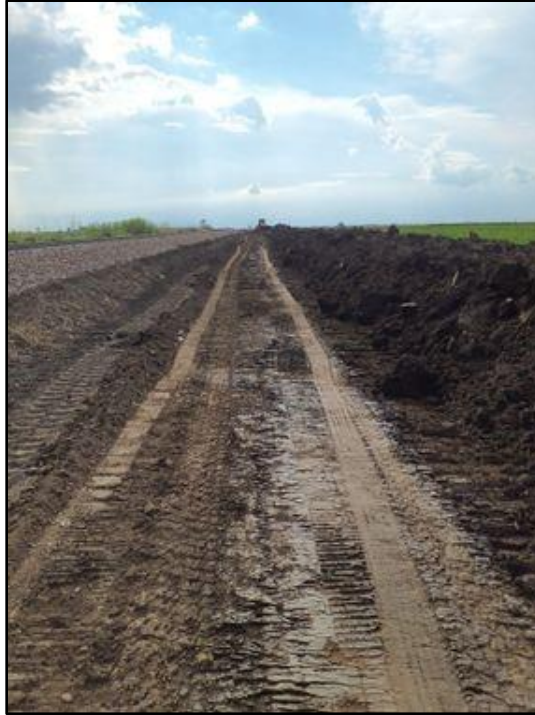


Figure 1. Bulldozer removing topsoil along the right-of-way; view facing west. (Photograph by R. Teboe, June 7, 2023.)



Figure 2. Bulldozer and dump truck adding rock fill to areas where topsoil was removed; view facing east. (Photograph by R. Teboe, June 22, 2023.)



Figure 3. Overview of mesh soil fence; facing northwest.
(Photograph by T. Schade, June 26, 2023.)



Figure 4. Overview of the bore crew drilling holes for wall beams; facing northeast.
(Photograph by S. Peterson, August 30, 2023.)



Figure 5. Excavator moving topsoil by a culvert on west side of project area; view facing east.
(Photograph by S. Cohen, September 5, 2023.)



Figure 6. Drilling continues throughout the day, wall installation; view facing east.
(Photograph by S. Cohen, September 18, 2023.)



Figure 7. Trenching progress around culvert; view facing south. (Photograph by T. Schade, October 9, 2023.)



Figure 8. Pipe boring under the track. First run is all backfill, containing 20 percent large ballast rock; view facing east.
(Photograph by T. Schade, October 18, 2023.)



Figure 9. Overview of the excavations for the access road; facing southwest.

(Photograph by A. Rivera, November 11, 2023.)



Figure 10. Overview of the culvert installation and cleanup work; facing west.

(Photograph by A. Rivera, November 17, 2023.)



Figure 11. Drilling and construction area undergoing routine prep work; view facing west.
(Photograph by T. Himebaugh, December 4, 2023.)



Figure 12. Overview of progress on rebar mesh; facing south.
(Photograph by T. Himebaugh, December 5, 2023.)



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TECHNICAL MEMORANDUM

To: Michael Keller
HDR Inc.
michael.keller@hdrinc.com

From: Jolene Schleicher, Project Manager; Matthew Hull, Principal Investigator, SWCA
Environmental Consultants

Date: November 28, 2023

Re: **HDR Rail Monitoring Summary Report, November 2023, Spiro, Oklahoma / SWCA
Project No. 77801**

PROJECT DESCRIPTION

SWCA Environmental Consultants (SWCA) was contracted by HDR, Inc. (HDR) to monitor for cultural resources during the construction of capital improvements along the Canadian Pacific and Kansas City Southern rail right-of-way. These capital improvements consist of extending 13 existing sidings, adding 10 new passing sidings, adding one new section of facility working track, and adding one new section of double track (project). The project is taking place in various locations. This summary report for the Spiro, Oklahoma, project area (project area), as required by HDR, documents the completed cultural resources monitoring activities undertaken by SWCA at this location between August 14 and November 16, 2023.

SWCA personnel who monitored construction at the Spiro, Oklahoma, project area and the construction monitoring dates are summarized in Table 1.

Table 1. Cultural Resource Monitor and Dates of Monitoring at the Spiro, Oklahoma, Project Area

SWCA Cultural Resource Monitor	Dates of Construction Monitoring
Travis Himebaugh	August 14–18, 21–25, and 28–31; September 1, 11–15, 18–22, and 25–29; October 2–6, 9–12, 24–27, and 30–31; November 1–3, 6–10, and 13–16, 2023 (completed)
Ross Campbell	September 5–8, 2023
Ryan Cline	October 16–20, 2023

MONITORING METHODS

SWCA monitoring methods consisted of the visual inspection of ground-disturbing activities, such as bulldozing and scraping, associated with construction. The archaeologist observed soil removal, digging, and drilling activities (Figures 1–15) and monitored for the presence of cultural resources, such as bone,

individual artifacts, artifact concentrations, and features. The archaeologist also inspected the surrounding area and soil stockpiles for the presence of cultural resources.

MONITORING SUMMARY

The type of construction activities monitored and the results of monitoring at the Spiro, Oklahoma, project area between August 14 and November 16, 2023, are presented in Table 2. At the beginning of ground disturbance, SWCA's archaeologist presented a training to construction personnel, providing background as to why archaeology monitoring is being conducted, what the archaeologist is looking for, and what steps are to be taken if cultural resources are identified during construction.

Table 2. Spiro, Oklahoma, Project Area Construction Activities and Results

Construction Activities Monitored	Results
Topsoil removal; gravel hauling and smoothing; excavation; cut and fill grading; plastic erosion-resistant Geo gridded-mesh laid and buried; tree clearing; drilling; converting borrow pit into pond; culvert installation	No features or cultural resources were identified during monitoring.

Results

In August and September 2023, a series of glass insulators were observed during monitoring. They were initially identified as historic but determined to be modern upon further review. No features or significant cultural materials were identified during cultural resources monitoring at the Spiro, Oklahoma, project location. No known cultural resources have been impacted by construction.

CONCLUSIONS

Between August 14 and November 16, 2023, SWCA conducted cultural resources monitoring and tasks associated with the Spiro, Oklahoma, project area during construction on the project, which commenced on August 14, 2023, and completed on November 16, 2023. No features or cultural materials were identified during cultural resources monitoring, and no known cultural resources were impacted by construction at the Spiro, Oklahoma, project area.



Figure 1. Initial topsoil clearance by a bulldozer; view facing southwest. (Photograph by T. Himebaugh 8/15/23.)



Figure 2. Excavating along the right-of-way; view facing southwest. (Photograph by T. Himebaugh 8/24/23.)



Figure 3. Preparing area for silt fence installation, hay bales used as ballast; view facing southwest. (Photograph by T. Himebaugh 8/25/23.)



Figure 4. Removal of backfill via excavator and dump truck; view facing south. (Photograph by T. Himebaugh 8/29/23.)



Figure 5. Drilling for post installation; view facing east. (Photograph by T. Himebaugh 9/1/23.)



Figure 6. Excavator spreading gravel near bridge; view facing east. (Photograph by T. Himebaugh 9/1/23.)



Figure 7. Excavation of borrow pit after topsoil clearance; view facing southwest. (Photograph by R. Campbell 9/5/23.)



Figure 8. Cut and fill grading using fill from the borrow pit; view facing southwest. (Photograph by R. Campbell 9/6/23.)



Figure 9. Continued excavation of borrow pit; view facing southeast. (Photograph by T. Himebaugh 9/18/23.)



Figure 10. Spreading fill dirt along the right-of-way; view facing northeast. (Photograph by T. Himebaugh 9/27/23.)



Figure 11. Excavator clearing area for culvert installation; view facing northeast. (Photograph by T. Himebaugh 10/4/23.)



Figure 12. Tree limbing to assist with inserting culvert pipe extension; view facing northeast. (Photograph by T. Himebaugh 10/9/23.)



Figure 13. Drilling for core samples near bridge to be replaced; view facing southeast. (Photograph by R. Cline 10/17/23.)



Figure 14. Drilling for beam installation; view facing east. (Photograph by T. Himebaugh 10/30/23.)



Figure 15. Excavator cleaning out mud near drill locations; view facing northeast. (Photograph by T. Himebaugh 11/13/23.)