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Office of Chief Counsel
August 26, 2025
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Public Record

August 26, 2025

CSXT-20

VIA E-FILING

Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Re: STB Docket No. FD 36836, Norfolk Southern Corporation & Norfolk Southern Railway Company—Acquisition of Control—Norfolk & Portsmouth Belt Line Railroad Company

Dear Chief of Case Administration:

Enclosed please find letters in regard to the application filed by Norfolk Southern Corporation and Norfolk Southern Railway Company in the above-referenced proceeding from the following parties:

- Delegate Bonita Anthony, Virginia House of Delegates, 92nd District
- Delegate Jackie Hope Glass, Virginia House of Delegates, 93rd District
- Delegate Phil Hernandez, Virginia House of Delegates, 94th District
- Bryan Stephens, President and CEO of Hampton Roads Chamber
- Paul Stetson Rice & Emily Hamm, Co-Presidents of the West Ghent Civic League
- Charles F. Stanton, Chair of the Norfolk Democratic Committee
- Louisa M. Strayhorn, Former Member of the Virginia Port Authority Board; Former Councilwoman of the Virginia Beach City Council; Former Director of the Virginia Department of Business Assistance
- Barbara Klear

Chief of Case Administration
August 26, 2025
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Respectfully submitted,

/s/ Peter W. Denton

Peter W. Denton
Attorney for CSX Transportation, Inc.

Enclosures



COMMONWEALTH OF VIRGINIA
HOUSE OF DELEGATES
RICHMOND

BONITA ANTHONY
POST OFFICE BOX 1853
NORFOLK, VIRGINIA 23501
NINETY-SECOND DISTRICT

COMMITTEE ASSIGNMENTS:
PRIVILEGES AND ELECTIONS
TRANSPORTATION
FINANCE

August 8, 2025

Cynthia T. Brown
Chief of Administration
Surface Transportation Board
Office of Proceedings
395 E Street, SW
Washington, DC 20423

Re: STB Docket No. FD 36836 – Opposition to Norfolk Southern’s Application

Dear Ms. Brown,

I write as the Delegate representing Virginia’s 92nd House District, which includes much of the City of Norfolk directly impacted by heavy container truck traffic along Hampton Boulevard and surrounding communities. I respectfully urge the Surface Transportation Board to deny Norfolk Southern’s application to control the Norfolk and Portsmouth Belt Line Railroad (NPBL).

As a former student, faculty member, and administrator at Old Dominion University, and as a long-time Norfolk resident, I know firsthand how essential Hampton Boulevard is to the daily lives of my constituents. It serves not only our academic institutions and hospitals, but also the neighborhoods that have long shouldered the burden of heavy freight traffic.

Studies from the Hampton Roads Transportation Planning Organization and others have identified Hampton Boulevard as a corridor of concern for traffic safety and pedestrian vulnerability. Providing CSX access to competitive on-dock rail service at Norfolk International Terminals would significantly reduce truck volume on Hampton Boulevard, removing tens of thousands of trucks each year.

This issue is not just about competition, it is about safety, public health, and economic fairness. Norfolk Southern’s application would limit CSX’s ability to operate as a meaningful competitor, undermining the original intent of the NPBL, which was created to ensure fair and open access to the Port of Virginia’s terminals.

Enabling both CSX and Norfolk Southern to serve the Port supports local business growth, enhances freight efficiency, and reduces the environmental burden on communities already overexposed to emissions and deteriorating infrastructure.

The Port of Virginia is among the most vital in the country. It must operate in a way that reflects the values of competition, transparency, and community-centered development.

Thank you for your attention and consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bonita Anthony". The signature is written in dark ink and is positioned below the word "Sincerely,".

Delegate Bonita Anthony
Virginia House of Delegates, 92nd District



JACKIE H. GLASS
POST OFFICE BOX 99071
NORFOLK, VIRGINIA 23509
NINETY-THIRD DISTRICT

COMMONWEALTH OF VIRGINIA
HOUSE OF DELEGATES
RICHMOND

COMMITTEE ASSIGNMENTS:
PRIVILEGES AND ELECTIONS
COMMUNICATIONS, TECHNOLOGY, AND
INNOVATION
TRANSPORTATION
AGRICULTURE, CHESAPEAKE AND NATURAL
RESOURCES

August 6, 2025

Cynthia T. Brown
Chief of Administration
Surface Transportation Board
Office of Proceedings
395 E Street, SW
Washington, DC 20423

Re: STB Docket No. FD 36836

Dear Ms. Brown:

As Delegate representing Virginia's 93rd House District, encompassing a significant portion of Norfolk, I strongly advocate for safe, efficient, and competitively balanced rail service. With this principle in mind, I respectfully express my concerns regarding Norfolk Southern's (NS) application to maintain control over the Norfolk Portsmouth Belt Line (NPBL). While I recognize and value NS's essential role within our region's transportation network, I firmly believe in fostering cooperative practices that encourage healthy competition, ultimately benefiting our community, local businesses, and the Commonwealth of Virginia.

The Port of Virginia, and specifically Norfolk International Terminals (NIT), represents not just a regional asset but an economic cornerstone crucial to Virginia's prosperity. Current constraints resulting from NS's control of NPBL significantly limit competition, inadvertently creating barriers to efficient and cost-effective rail service. It is crucial to ensure that other carriers, like CSX Railroad, have fair opportunities for direct, on-dock rail access.

Presently, cargo bound for CSX customers must be transported by truck, resulting in approximately 100-150 additional truck trips each day along Hampton Boulevard. This situation exacerbates traffic congestion, impacts neighborhood safety, and compromises the overall well-being of our residents, including students at Old Dominion University.

Granting CSX direct rail access at NIT would significantly alleviate these issues, reducing road congestion, enhancing public safety, and improving environmental conditions. Promoting this competitive rail environment will drive efficiencies, decrease transportation costs, and provide broader economic benefits for local businesses and Virginia consumers alike.

Our Commonwealth has committed significant resources to expanding and modernizing our port infrastructure, including NIT, to secure our economic future. Ensuring fair and balanced rail

competition aligns perfectly with these goals. Our commitment must be to collaboration and competitive growth, enabling both major and smaller industry players to thrive together.

I urge the Board to carefully consider the benefits of balanced competition and cooperative growth by declining Norfolk Southern's application for continued control over NPBL.

With gratitude,

A handwritten signature in black ink, reading "Jackie Glass". The signature is written in a cursive, flowing style.

Jackie Hope Glass

Delegate, Virginia House of Delegates
District 93



COMMONWEALTH OF VIRGINIA
HOUSE OF DELEGATES
RICHMOND

PHIL M. HERNANDEZ

P.O. BOX 8927
NORFOLK, VIRGINIA 23503
NINETY-FOURTH DISTRICT

COMMITTEE ASSIGNMENTS:
COURTS OF JUSTICE
FINANCE
AGRICULTURE, CHESAPEAKE
AND NATURAL RESOURCES

August 8, 2025

Cynthia T. Brown
Chief of Administration
Surface Transportation Board
Office of Proceedings
395 E Street, SW
Washington, D.C. 20423

Re: STB Docket No. FD 36836

Members of the Surface Transportation Board:

As the STB considers future control of the Norfolk & Portsmouth Belt Line ("NPBL"), I write to underscore my view that the Port of Virginia, the entire Hampton Roads region, and the Commonwealth of Virginia as a whole stand to benefit if more than one rail carrier is allowed on-dock access at Norfolk International Terminal ("NIT").

NIT is located in Norfolk's 94th District, which I represent in the Virginia House of Delegates. Our community is proud of the Port and its contributions to our economy, yet I frequently hear concerns about traffic congestion—and specifically about the high number of trucks coming in and out of the Port—that builds up in residential neighborhoods along Hampton Boulevard. The regular traffic raises concerns about public safety and wear-and-tear on Norfolk's transportation infrastructure.

While I understand that Norfolk Southern handles virtually all traffic that moves to rail at NIT, I also understand that allowing another carrier, like CSX, to directly access NIT could eliminate between 100 to 150 daily truck trips along Hampton Boulevard and other local roads. Efficiency improvements of this magnitude would be strongly supported by local residents. I hope the STB gives weight to these considerations in its future decisions regarding the NPBL.

Sincerely,

A handwritten signature in black ink, appearing to read "Phil Hernandez".

PHIL HERNANDEZ
Delegate, District 94

August 6, 2025

Cynthia T. Brown
Chief of Administration
Surface Transportation Board
Office of Proceedings
395 E Street, SW
Washington, DC 20423

Re: STB Docket No. FD 36836, Norfolk Southern Corporation & Norfolk Southern Railway Company – Acquisition of Control – Norfolk & Portsmouth Belt Line Railroad Company

Dear Ms. Brown:

I am writing to urge the Surface Transportation Board (Board) to deny Norfolk Southern's (NS) application seeking authority to acquire control of the Norfolk & Portsmouth Belt Line Railroad Company (NPBL).

The Hampton Roads Chamber represents over 1200 businesses in the region. The availability of safe, efficient, and competitive rail service is important to our region. I am concerned that NS's application will have the effect of preventing CSX Transportation, Inc. (CSX) from becoming an effective rail competitor at Norfolk International Terminals (NIT). I am also concerned about the economic, competitive and transportation impacts that the proposed transaction will have on businesses and the transportation network in the region.

The Port of Virginia's (POV) NIT is one of the most important container port terminals on the Eastern Seaboard and a key economic driver for Virginia, the Hampton Roads region, and the City of Norfolk. NS's ongoing control of NPBL has resulted in the elimination of meaningful competition at NIT and has restricted shippers to a single rail carrier (NS) for on-dock rail service. POV, the customers it serves, and the citizens of Hampton Roads would benefit from competition between NS and CSX for on-dock rail access at NIT.

I understand that NS handles nearly all traffic that moves to rail at NIT, and that all import cargo at NIT bound for CSX rail must be moved by truck, or drayed, from NIT to Virginia International Gateway (VIG) in Portsmouth, and vice versa for export cargo. This cross-town workaround is more costly, inefficient for POV and its customers, and unnecessarily congests local roads. The lack of competition at NIT also drives up prices for freight transportation services, which ultimately leads to higher prices for consumers.

Additionally, CSX's lack of rail access to NIT negatively impacts traffic and transportation safety for motorists in the region. The drayage workaround referenced above adds roughly 100-

150 daily truck moves from NIT in Norfolk to VIG in Portsmouth along Hampton Boulevard, a four-lane local road through neighborhoods, and the Old Dominion University campus. Notably, local and regional officials have consistently identified Hampton Boulevard as a top area in need of safety improvements. CSX on-dock rail service at NIT would remove the significant number of daily truck trips from the drayage program from Hampton Boulevard and other roads in the region.

POV is one of the fastest growing ports in the country and has invested billions of dollars to expand its ports, including NIT. CSX should have on-dock rail access to NIT, which would support the projected increased international intermodal traffic at NIT, which in turn would stimulate the economy and create jobs. Failure to ensure on-dock rail competition at NIT would squander an opportunity to spur economic growth and to create jobs in our communities, while putting POV at a competitive disadvantage to other East Coast ports.

For these reasons, I encourage the Board to deny NS's application and to restore the proper competitive landscape for rail transportation at NIT. If you have any questions or need additional information, please contact me at bkstephens@hrchamber.com or 757.664.2535.

Sincerely,



Bryan Stephens,
President and CEO Hampton Roads Chamber

August 18, 2025

Cynthia T. Brown
Chief of Administration
Surface Transportation Board
Office of Proceedings
395 E Street, SW
Washington, DC 20423

Re: STB Docket No. FD 36836 – Concerns Regarding Rail Access and Public Safety in Norfolk, Virginia

Dear Ms. Brown,

We write to you today as co-presidents of the West Ghent Civic League, a volunteer-run organization representing residents of one of Norfolk's most vibrant, walkable, and historic neighborhoods. Our mission is simple: to improve quality of life, protect community safety, and serve as a voice for the people who call West Ghent home.

That mission compels us to oppose Norfolk Southern's application to acquire full control of the Norfolk & Portsmouth Belt Line Railroad (NPBL), and to urge the Surface Transportation Board to restore competitive rail access at Norfolk International Terminals (NIT).

The current lack of rail competition at NIT has created a ripple effect that directly impacts our community. Because CSX is blocked from directly serving NIT, hundreds of containers bound for CSX trains are instead loaded onto trucks that must travel across the city to the Virginia International Gateway terminal in Portsmouth.

These trucks are routed down Hampton Boulevard, a four-lane thoroughfare that runs immediately adjacent to our neighborhood, past homes, parks, schools, and the Old Dominion University campus. This daily convoy, estimated at 100 to 150 container trucks per day, turns a key community corridor into an industrial trucking route. It threatens pedestrian and cyclist safety, degrades air quality, and puts additional stress on already aging road infrastructure.

If you are unaware of our vibrant community, West Ghent is a neighborhood where families walk their kids to school, where college students bike to class, and where seniors stroll down shaded sidewalks to visit the Wyanoke Bird Sanctuary or grab a coffee. We take pride in our walkability, bike-ability, and livability, values we've worked hard to protect through initiatives like traffic calming projects, clean-up events, and our Adopt-a-Spot beautification program.

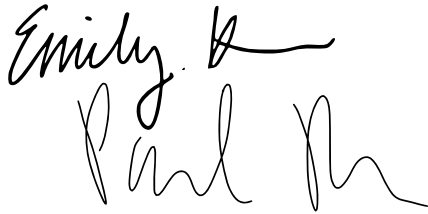
We understand that freight movement is vital to our economy, but that movement must be safe, sustainable, and respectful of the communities it touches. Forcing freight trucks through residential areas simply because one railroad wants to preserve its exclusive control is not acceptable.

Allowing CSX on-dock rail access to NIT would immediately reduce heavy truck volumes along Hampton Boulevard. It would cut emissions, improve traffic flow, and make our streets safer for everyone, from schoolchildren crossing the street to seniors walking their dogs. Rail is not only more efficient than trucking; it's safer, cleaner, and more compatible with the kind of neighborhood we are proud to be.

West Ghent is a small neighborhood, but our story reflects the experiences of many across Norfolk. We are not anti-business. We are pro-community. We believe infrastructure should serve the public good, and that no single corporation should be able to gatekeep access to public assets like the Port of Virginia.

We respectfully urge the Board to deny Norfolk Southern's application, and to take action that ensures fair rail access, safe neighborhoods, and the kind of equitable transportation system Norfolk residents deserve.

Sincerely,

The image shows two handwritten signatures in black ink. The top signature is 'Emily' followed by a stylized flourish. The bottom signature is 'Paul' followed by a stylized flourish.

Paul Stetson Rice & Emily Hamm
Co-Presidents, West Ghent Civic League
www.westghentcivicleague.org

Charles F. Stanton
1016 Harrington Ave
Norfolk, VA 23507
757-344-2277

8-21-25

Cynthia T. Brown
Chief of Administration
Surface Transportation Board
Office of Proceedings
395 E Street, SW
Washington, DC 20423

Re: STB Docket No. FD 36836
Ensuring Competitive Rail Access at the Port of Virginia

Dear Ms. Cynthia Brown,

As Chair of the Norfolk Democratic Committee, I am writing today to urge the Surface Transportation Board to deny Norfolk Southern's application to acquire full control of the Norfolk & Portsmouth Belt Line Railroad (NPBL). This application does not serve the public interest. Instead, it seeks to formalize a system that has denied competition, burdened working-class communities, and undermined the spirit of public investment in Virginia's transportation infrastructure.

Monopoly Control Harms the Port and the People It Serves:

At a time when our Commonwealth is investing billions to modernize infrastructure and grow our economy equitably, it is unacceptable that a single railroad has unilateral control over on-dock rail access at Norfolk International Terminals (NIT). Norfolk Southern's control of NPBL has already had harmful effects: CSX is blocked from directly accessing NIT by rail, forcing cargo to be trucked across town to Virginia International Gateway (VIG) terminal in Portsmouth.

This unnecessary workaround is not a minor inconvenience. It is a structural barrier to competition that raises shipping costs, hurts small businesses, and undermines the efficiency of our region's most critical logistics hub. Shippers, consumers, and our working-class communities all pay the price for one company's desire to protect its market share.

Norfolk Neighborhoods Bear the Burden:

Norfolk is a city of neighborhoods, and I represent a party that believes those Communities should be protected, not treated as collateral damage in a private dispute. Every day, an estimated 100 to 150 container trucks are routed down Hampton Boulevard, through residential areas and past Old Dominion University, because CSX is blocked from directly serving the port.

These heavy trucks create dangerous conditions for pedestrians and cyclists, add emissions to neighborhoods already dealing with environmental stress, and cause wear and tear on local infrastructure. The result is that working-class residents subsidize corporate monopoly behavior with their safety, air quality, and public dollars.

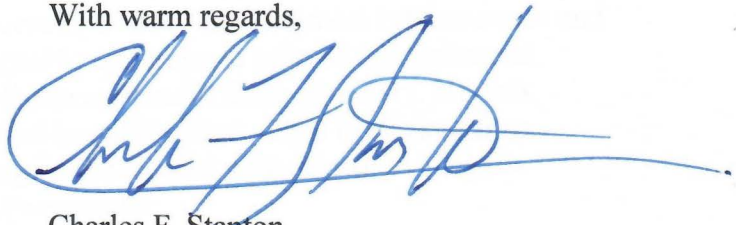
Restoring Competition Is Good Policy:

There is nothing radical about asking for rail competition at a public terminal. It's common-sense governance. CSX has the capacity, equipment, and readiness to serve NIT and has done so historically. Norfolk Southern's refusal to allow that access has turned what should be a shared asset into a closed system.

As Democrats, we believe in accountable government, fair competition, and infrastructure that works for all, not just those with market power. This case is about much more than two railroads. It's about whether public investment will be used to create inclusive economic growth, or whether we will let monopoly power carve out a protected corner of the economy behind closed gates.

I respectfully urge the Board to reject this application. Restore balance. Reopen the port. Let rail competition, and the public, have a fair shot.

With warm regards,

A handwritten signature in blue ink, appearing to read 'Charles F. Stanton', with a long horizontal flourish extending to the right.

Charles F. Stanton

CFS/s

Cynthia T. Brown

Chief of Administration
Surface Transportation Board
Office of Proceedings
395 E Street, SW
Washington, DC 20423

Re: STB Docket No. FD 36836 – Norfolk Southern’s Application to Control NPBL

Dear Ms. Brown,

I write with a unique perspective shaped by service as a member of the Virginia Port Authority Board, a Virginia Beach City Councilmember, and as Director of the Virginia Department of Business Assistance under Governor Tim Kaine. In each of these roles, one principle has remained constant: **public infrastructure must serve the public good.**

That principle is at the core of my request that the Surface Transportation Board deny Norfolk Southern’s application to acquire control of the Norfolk & Portsmouth Belt Line Railroad (NPBL). This matter goes far beyond which carrier serves which terminal—it is about whether our public institutions will uphold fairness, competition, and accountability to the communities they exist to serve.

The Port of Virginia is one of the Commonwealth’s most powerful economic engines. It has thrived because of **bipartisan vision and more than \$1.4 billion in public investment.** That investment was never intended to benefit a single company. Yet Norfolk Southern, through its majority control of NPBL, has effectively blocked its competitor CSX from direct rail access to Norfolk International Terminals (NIT).

That is not how public infrastructure is supposed to work.

The consequences of this monopoly are not confined to the railyard. By shutting CSX out of NIT, Norfolk Southern has forced cargo that could move by rail onto trucks—more than **100 container truck trips daily** along Hampton Boulevard. Those trucks cut through residential neighborhoods, pass a major university, and travel on roads never designed for heavy industrial traffic. The results are clear: increased congestion, higher safety risks, environmental harm, and costly damage to local infrastructure.

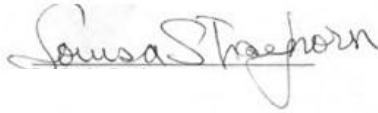
The economic impact is equally troubling. Higher shipping costs ripple through the supply chain, raising prices and limiting opportunity—particularly for small and minority-owned businesses that depend on affordable logistics to compete. As someone who has worked to expand opportunity for communities too often left behind, I know firsthand that

restricted access creates lasting barriers. Public infrastructure, like opportunity itself, must be broad—not bottlenecked.

Approving this application would not only reward years of anti-competitive behavior, it would also lock in a structure that benefits one carrier at the expense of taxpayers, neighborhoods, and Virginia's long-term growth. That is the wrong path for the Port, the Commonwealth, and the country.

For the good of the Port of Virginia, the communities it touches, and the principles of fairness and competition that guide our public institutions, I respectfully urge the Board to reject Norfolk Southern's application and restore genuine, competitive rail access to Norfolk International Terminals.

Sincerely,

A handwritten signature in dark ink, reading "Louisa Strayhorn". The signature is fluid and cursive, with the first name "Louisa" and last name "Strayhorn" clearly legible.

Louisa M. Strayhorn

Former Member, Virginia Port Authority Board

Former Councilwoman, Virginia Beach City Council

Former Director, Virginia Department of Business Assistance

BARBARA KLEAR
7320 GLENROIE AVE, APT 12E
NORFOLK, VA 23505

August 19, 2025

Cynthia T. Brown
Chief of Administration
Surface Transportation Board
Office of Proceedings
395 E Street, SW
Washington, DC 20423

Re: STB Docket # FD 36836 – Restoring Rail Competition at the Port of Virginia

Dear Ms. Brown:

As a 60-year resident of Norfolk, Virginia who has been active in public and community affairs, I am writing to express my deep concern about the long-standing lack of competition at Norfolk International Terminals (NIT), and to urge the Surface Transportation Board to deny Norfolk Southern's application to acquire control of the Norfolk & Portsmouth Belt Line Railroad (NPBL). The Virginia Port Authority (VPA) needs to be able to manage port logistics – either by rail or drayage. You may hear from a variety of elected officials or community entities, but you also need to hear from the average citizen. This issue speaks directly to the values I have spent my career working to uphold: fairness, accountability, and the responsible use of public resources.

One Company Should Not Control Access to a Public Port

We cannot allow one company to control the rail lines. NIT is a publicly supported asset. Virginia taxpayers have invested more than \$1.4 billion to expand and modernize the Port of Virginia. And yet, Norfolk Southern has used its controlling interest in NPBL to effectively block CSX from directly accessing NIT by rail, forcing unnecessary trucking across Hampton Roads just to reach a different terminal.

This undermines the very goals of that public investment. If we believe in good governance and fiscal responsibility, then we cannot allow any one private company to gatekeep access to infrastructure paid for by the people of Virginia.

Environmental and Community Impacts

I live about a half mile from NIT. From the balcony of my high-rise condominium, I can watch the Sewell's Point cranes loading and unloading the multitude of containers arriving and departing daily. The many trains crisscrossing our city impact Norfolk daily. However, many of us also understand the importance of NIT to our local economy. VPA must have the resources to control the logistics of the rails and drayage.

The forced truck traffic from NIT to the Virginia International Gateway (VIG) in Portsmouth, estimated at over 100 daily trips, is not only inefficient, but harmful. It clogs city streets, adds wear and tear to roads, and creates dangerous traffic conditions on corridors like Hampton Boulevard, which runs through the Old Dominion University campus and nearby neighborhoods. The number of semitrailers moving containers from one port to another must

be resolved. Hampton Blvd is not a wide street with a large median. Once the trucks have moved through Old Dominion University with its many lights and students running to cross against the lights, the street becomes four very narrow lanes (2 north, 2 south). During peak hours, the street is crowded with the trucks, cars with Old Dominion students and staff, and military men and women. At the south end of Hampton Blvd is our regional medical complex with a trauma 1 emergency department. At the north end, just beyond NIT, is Norfolk Naval Station, the world's largest Naval base, which houses approximately 67,000 active-duty military and civilian employees. All affected by the trains and trucking.

From a sustainability standpoint, this approach is indefensible. Rail is dramatically cleaner and more fuel-efficient than trucks. A single train can remove hundreds of trucks from the road, reducing carbon emissions, improving air quality, and lowering noise and congestion in our most vulnerable communities. Denying CSX access to the terminal not only suppresses competition; it worsens our environmental footprint. Truckers idle in long lines waiting to access NIT. Their engines are running. All traffic is impacted.

Rail Competition Is in the Public Interest

Allowing CSX to serve NIT would restore a level playing field and benefit everyone: port workers, small businesses, shippers, and consumers alike. Norfolk Southern's application would do the opposite: entrench a monopoly, drive up prices, and stall progress on critical environmental and economic goals.

This is not a technical matter of rail operations. It is a question of whether public infrastructure serves the public, or whether it serves the entrenched interests of a single corporation.

For these reasons, I respectfully urge the Board to reject this application and take steps to ensure that the Port of Virginia remains open, competitive, and accountable to the people who fund and rely on it.

Sincerely,

_____/s/
Barbara Klear
7320 Glenroie Ave, Apt 12E
Norfolk, VA 23505
KlearB@gmail.com
757-477-2858

CERTIFICATE OF SERVICE

I hereby certify that I have caused this Letter in Docket No. FD 36836 to be served electronically or by first class mail, postage pre-paid, on the Secretary of Transportation, the Attorney General of the United States, Administrative Law Judge Jenifer Soulikias, Applicants' representative, William Mullins, and all parties of record in this proceeding.

/s/ Jensen Matsuda

Jensen Matsuda
Attorney for CSX Transportation, Inc.

August 26, 2025