

BEMENT COMMUNITY UNIT SCHOOL DISTRICT 5

"The Pride of Piatt County"

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August 20, 2026

RE: Docket No. FD 36873 – Preliminary Consultation Comments

Dear Office of Environmental Analysis:

Bement Community Unit School District #5 appreciates the opportunity to provide preliminary comments regarding the environmental review of the proposed Union Pacific acquisition of Norfolk Southern. The District is not taking a position on the proposed transaction. Rather, we are providing information about existing local conditions and requesting that potential impacts to our students, staff, families, and community be considered as the Office of Environmental Analysis develops the Environmental Impact Statement (EIS).

Bement is located at the southern end of the Bloomington District rail segment identified in the Surface Transportation Board's Data Explorer as exceeding the Board's threshold for air quality and noise analysis. According to the Data Explorer, the 40.1-mile Gibson City-to-Bement segment is projected to increase from 2.60 trains per day in Year 5 without the transaction to 3.03 trains per day in Year 5 with the transaction. Although the transaction-related increase in the number of trains is relatively modest, the projected transaction-related growth in freight volume is substantial at 156.67 million gross ton-miles, representing an increase of 121.80%.

The District is particularly concerned about how this increase in freight activity may interact with conditions that already exist in Bement. Our community regularly experiences extended railroad crossing blockages caused by stopped Norfolk Southern trains, including at the Macon Street/Illinois Route 105 crossing. These blockages can disrupt travel through the community for extended periods. The District understands that some extended stops may be associated with railroad operating practices, including crew changes and federal hours-of-service limitations.

This is an existing and documented community concern. The Illinois State Rail Plan identifies a proposed Bement Grade Separation involving three Norfolk Southern crossings in Bement (DOT #479969M, #479967Y, and #479966S), with the stated purpose of mitigating the impacts of blocked crossings on the community, improving safety, and reducing delays.

Because Bement already experiences the effects of extended crossing blockages, Bement CUSD #5 respectfully requests that the EIS evaluate whether transaction-related increases in freight activity could exacerbate these existing conditions. Specifically, we ask that the environmental review consider:

- Potential changes in train length, weight, and operating practices associated with the projected increase in gross ton-miles;
- The frequency and duration of blocked grade crossings within Bement, particularly the Illinois Route 105/Macon Street crossing;

- Effects of crossing blockages on school bus routes and the safe and timely transportation of students;
- Effects on emergency vehicle access and response times to the school campus and throughout the community;
- Pedestrian and student safety at or near railroad crossings; and
- Potential noise and air-quality impacts associated with increased freight activity and trains stopped for extended periods.

The District is also aware that hazardous materials are transported through the community as part of existing freight operations. We recognize that the Data Explorer does not identify the Bement segment as experiencing transaction-related growth of one or more hazardous-material carloads per day. Nevertheless, we ask that the EIS consider whether transaction-related operational changes, when combined with existing freight traffic and extended crossing blockages, could affect emergency response and community safety in the event of a rail incident.

Bement CUSD #5 appreciates the Surface Transportation Board's consideration of these local conditions. We respectfully request that Bement's existing history of extended crossing blockages, and the potential effects of substantially increased freight volume on those conditions, be considered as the Environmental Impact Statement is developed.

Respectfully,

A handwritten signature in cursive script, reading "Mary Vogt".

Mary Vogt
Superintendent
Bement Community Unit School District #5