
Lockport School District 91

808 Adams Street, Lockport, IL 60441

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Mrs. Jaime Koziol, Superintendent



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Date: August 25, 2026

To: Elizabeth Webster, Office of Environmental Analysis

Agency: Surface Transportation Board

Docket No.: FD 36873 (Union Pacific Corporation and Union Pacific Railroad Company—Control—Norfolk Southern Corporation and Norfolk Southern Railway Company)

Filer: Mrs. Jaime Koziol, Superintendent, Lockport School District 91

Subject: **Public Comment on Scoping and Environmental Review for Proposed Control Transaction**

Statement of Interest and Context

This comment is submitted on behalf of Lockport School District 91, representing our students, staff, and community families. District 91 operates as a walking-only school district where students commute to and from school daily without school bus transportation. Because hundreds of children spend significant time outdoors each day actively walking along and across local transportation corridors, ambient air quality and pedestrian crossing safety directly impact their health, safety, and daily access to education.

Primary Environmental and Public Health Concerns

- **Localized Air Quality and Diesel Particulate Exposure:** The Office of Environmental Analysis (OEA) has identified rail line segments in our area that would experience operational changes exceeding the Board's environmental analysis thresholds under 49 C.F.R. § 1105.7(e)(5). For rail lines in nonattainment or Class I areas, an increase of 3 or more trains per day or a 50% increase in gross ton-miles triggers review; in other areas, the threshold is an increase of 8 or more trains per day or 100% gross ton-miles. Increased freight movement will directly increase local emissions of diesel particulate matter, nitrogen oxides, and air toxics. Children's developing respiratory systems are uniquely vulnerable to fine particulate matter, which can aggravate pediatric asthma and cause school absenteeism.
- **Pedestrian Safety and Crossing Delays:** An increase in train frequency and length through residential rail corridors increases the risk of blocked at-grade crossings during peak morning walk times (8:00 AM – 9:00 AM) and afternoon dismissal (3:00 PM – 4:00 PM). Blocked crossings force young pedestrians into unsafe delays or hazardous crossing attempts.

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Requested Scope for the Environmental Impact Statement (EIS)

1. **Micro-scale Air Toxics and Health Risk Assessment:** We request that the EIS evaluate ambient air quality and localized health risks specifically around school zones and primary student walking routes adjacent to segments exceeding the Board's thresholds.
2. **Pedestrian Crossing Impact Study:** We request a localized analysis of grade-crossing blockage times synchronized with school commuting hours to assess safety risks to walking students.
3. **Targeted Mitigation Requirements:** Should the Board approve the Transaction, Lockport School District 91 urges the Board to require the following binding mitigation conditions:
 - **Strict Anti-Idling Mandates:** Mandatory restrictions on locomotive idling near school properties and student walking routes.
 - **Clean Technology Prioritization:** Prioritization of low-emission or Tier 4 locomotives on rail lines adjacent to dense residential and school areas.
 - **Safety Infrastructure & Monitoring:** Rail company funding for enhanced pedestrian safety infrastructure (e.g., pedestrian gates, overpasses/underpasses, dynamic signage) at crossings near schools.
 - **School Facility Air Filtration:** Mitigation funding for high-efficiency air filtration systems (HEPA/MERV-13) in district school buildings near impacted tracks.

Thank you for considering the health and safety of Lockport School District 91's students as the Board evaluates the potential environmental impacts of Docket No. FD 36873. We request to remain on the public service list for all future environmental notices in this proceeding.

Respectfully submitted,

Mrs. Jaime Koziol

Superintendent

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