



City Manager's Office

29th Floor City Hall
414 East 12th Street
Kansas City, Missouri 64106-2768

August 25, 2026

Submitted electronically via www.stb.gov (Environmental Comments)

Ms. Elizabeth Webster Surface Transportation Board (Docket No. FD 36873) 395 E Street SW
Washington, DC 20423

Re: Docket No. FD 36873, Union Pacific Corporation and Union Pacific Railroad Company - Control
- Norfolk Southern Corporation and Norfolk Southern Railway Company; Preliminary Consultation
Comments of the City of Kansas City, Missouri

Dear Ms. Webster:

The City of Kansas City, Missouri (the City) submits these preliminary comments in response to the August 19, 2026 letter from the Board's Office of Environmental Analysis (OEA) inviting input to help define the scope of the environmental review of the proposed acquisition of control of Norfolk Southern by Union Pacific (the Transaction). The City appreciates the opportunity to participate and asks that it be treated as an interested party and kept informed throughout the proceeding.

Kansas City warrants particular attention in this review. OEA's letter explains that the combined system would be largely end to end, with the existing Union Pacific and Norfolk Southern networks overlapping only in Missouri and Illinois. Missouri is also identified among the states with rail line segments, rail yards, and intermodal facilities that could experience operational changes exceeding the Board's environmental analysis thresholds, and among the states where transaction-related capital improvements are proposed. Kansas City therefore sits in one of the most directly affected areas of the Transaction.

The City requests that the Environmental Impact Statement examine the following potential local effects of merger-related traffic increases, operational changes, and capital improvements within the City:

1. Grade-crossing safety and vehicle delay, including the frequency and duration of blocked crossings and the effect of longer or more frequent trains on collision risk.
2. Emergency response, including delays to police, fire, and emergency medical services caused by blocked or congested crossings, and the routes that depend on affected crossings.
3. Hazardous materials transportation, including the types and volumes of materials moved through the City, routing, derailment and spill history, and contingency and response planning.
4. Noise and vibration, including effects on sensitive receptors such as schools, hospitals, residences, and care facilities near affected lines and yards.

5. Air quality and emissions associated with increased rail and truck activity, including confirmation of the applicable thresholds for any segment located in or near a Clean Air Act nonattainment area.
6. Increased activity at rail yards and intermodal facilities, and the resulting truck traffic on City streets, including effects on congestion, road wear, and adjacent neighborhoods.
7. Land use, water resources, and cultural and historic resources potentially affected by any capital improvements or facility expansions proposed within the City.

To support this analysis, the City requests that OEA identify the specific rail line segments, crossings, yards, and intermodal facilities within Kansas City that are projected to exceed the Board's thresholds, and that the applicants' blocked-grade-crossing evidence and Safety Integration Plan be made available for review. The City intends to supplement these preliminary comments with more detailed, location-specific information as the scoping process continues, and it requests notice of the draft and final Environmental Impact Statement and any public scoping meetings.

The City looks forward to working with OEA and the applicants to ensure that the environmental review fully accounts for local impacts and that appropriate mitigation is considered. Please direct any questions or correspondence regarding these comments to the undersigned.

Sincerely

Signed by:

Mario Vasquez

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Mario Vasquez, City Manager

City of Kansas City, Mo.

