



United States Department of the Interior
NATIONAL PARK SERVICE
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1.A.2 (MWR-FPI)

VIA ELECTRONIC MAIL: NO HARD COPY TO FOLLOW

Memorandum

To: Danielle Gosselin, Director
Office of Environmental Analysis, Surface Transportation Board

From: Stephanie Stephens, Acting Regional Director
National Park Service, Midwest Region

Subject: Consultation Request – Docket No. FD 36873 Union Pacific Acquisition of Norfolk Southern

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The National Park Service (NPS) has reviewed the request for preliminary consultation regarding the proposed acquisition of Norfolk Southern Railway Company by Union Pacific Railroad Company. We acknowledge that portions of the proposal are located within or adjacent to NPS units in both the Midwest (MWR) and Southeast (SER) regions of the NPS. Because the proposal is in the early stages of development, some units are not yet able to fully assess whether resources under NPS management may be affected. We respectfully request to be included in future communication as the acquisition advances so we can better evaluate if the NPS has jurisdiction by law or special expertise regarding potential environmental impacts.

Within the MWR, Indiana Dunes National Park (INDU) has provided preliminary comments and recommendations based on their initial assessment of the information provided. The park's comments are included in Appendix A.

We appreciate the opportunity for early consultation and look forward to continued coordination with the Surface Transportation Board.

Please direct future communication to the contacts listed below.

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Appendix A: Indiana Dunes National Park - Preliminary Comments

Summary

Indiana Dunes National Park (park) recommends that the Office of Environmental Analysis (OEA) consider the localized effects of projected transaction-related rail operational changes on emergency access, park operations, visitor use, wildland fire risk, and park natural resources. These comments are intended to identify park-specific issues and information for consideration within the scope of OEA's environmental review. They do not represent a conclusion by the National Park Service (NPS) regarding whether any potential effect would occur or whether any effect would be significant. Because rail lines, roads, communities, and park lands are closely interwoven in northwestern Indiana, crossing-specific and seasonally informed analysis may assist OEA. Continued coordination would allow NPS to provide available operational and resource information.

Projected operational changes

The applicants' updated segment tables project transaction-related increases of approximately 4.4 trains per day on Chicago Line Segments 10059 and 10060. Segment 10059 includes the County Line Road and Mineral Springs Road grade crossings. The tables also project an approximately 87 percent transaction-related increase in annual gross ton miles on Segment 12690 between Michigan City and Porter, without an increase in train count. To help establish the relationship between the transaction and park-specific conditions, NPS recommends that OEA clarify, as appropriate, whether these projected increases would change train length, weight, or operating patterns near the park.

Emergency access to West Beach

South County Line Road is an important access route used by NPS and local fire, Emergency Medical Services (EMS), and law-enforcement responders to reach West Beach, particularly during the busy summer season. Park staff have observed that slow or stopped trains can produce extended crossing delays. To the extent projected transaction-related changes would affect train frequency, length, speed, or stopping behavior at this crossing, NPS recommends that OEA consider whether those changes could affect emergency access. Consultation with NPS and local responders, using any available dispatch, crossing, or incident information, would help relate the analysis to local conditions.

If OEA identifies a reasonably foreseeable increase in emergency-response delays attributable to the transaction, practical measures for consideration could include operating practices that reduce prolonged blockages, procedures for clearing the crossing during an emergency, real-time crossing information, and reliable 24-hour coordination between the railroad and emergency dispatchers. If operating measures would not reasonably address an identified effect, OEA could coordinate with the responsible transportation and emergency-management agencies regarding feasible alternate emergency access.

Wildland-fire risk

Recent severe storms have resulted in downed woody debris and increased fuel loading in portions of the park, including areas near active rail corridors. To the extent the transaction would increase rail activity or alter operations along those corridors, NPS recommends that OEA consider whether the specific operational changes could affect rail-related ignition risk or access for fire response under current fuel conditions.

Where OEA identifies a transaction-related effect, useful measures for consideration could include railroad fire-prevention and equipment-inspection practices, prompt reporting of ignitions, pre-incident planning, reliable emergency contacts, and coordination among the railroad, NPS, and local fire agencies. Any transaction-related vegetation or fuel management proposed within rights-of-way adjacent to park

lands would benefit from coordination with NPS to protect sensitive resources and avoid spreading invasive species.

Transportation effects on park operations and visitor experience

Visitors and residents use roads connecting with U.S. Highway 12 to reach beaches, park facilities, and nearby communities. The Mineral Springs Road crossing also provides access to park headquarters, nearby visitor-use areas, and park work locations. To the extent transaction-related changes would increase the frequency or duration of closures at crossings serving the park, NPS recommends that OEA consider whether those specific changes could affect traffic queuing, traffic safety, vehicle idling, visitor access, or park operations. Any analysis could focus on crossings with an identified transaction-related change and consider peak-use conditions.

Where OEA identifies park-specific effects attributable to the transaction, practical options could include railroad operating coordination, real-time traveler information, emergency-response protocols, or other crossing-specific measures developed with the responsible road authorities. OEA could also consider localized changes in locomotive emissions, noise, horn frequency, or vibration where it identifies a transaction-related change in rail operations near park resources or visitor-use areas.

Natural resources and incident response

If the transaction would result in additional train movements, materially longer or heavier trains, changed maintenance practices, movement of ballast or other materials, or ground disturbance adjacent to park lands, NPS recommends that OEA consider whether those specific changes could affect wildlife mortality or facilitate the introduction and spread of invasive species. Existing NPS habitat and resource information could help identify sensitive locations and focus any analysis. Where relevant, practical measures could include targeted monitoring, prompt treatment of newly detected invasive species, clean equipment and weed-free materials for ground-disturbing work, native revegetation, and coordination with NPS on right-of-way vegetation management.

Rail corridors near the park also adjoin wetlands, waterways, and other sensitive resources. Although the applicants' tables appear to project no transaction-related increase in hazardous-material carloads on the principal Chicago Line segments near the park, NPS recommends confirming that assumption. If OEA identifies a transaction-related change in hazardous-material volumes or routing, train configuration, or emergency access that could affect incident response near park resources, additional coordination on spill notification and response may be appropriate.

Continued coordination

NPS recommends continued coordination with Indiana Dunes National Park as the environmental review develops, particularly if transaction-related construction or operational changes are proposed near park lands. The park can assist, as appropriate, with available geographic, natural resources, fuels, invasive species, crossing, and emergency-response information. Where OEA identifies reasonably foreseeable park-specific effects, any mitigation developed through the review would benefit from clear implementation responsibilities, coordination procedures, and an appropriately scaled monitoring approach.