

September 21, 2026

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

RE: Docket No. FD 36873, Environmental Filing, Union Pacific Corporation and Union Pacific Company – Control – Norfolk Southern Corporation and Norfolk Southern Railway Company

Dear Ms. Webster,

As the federally designated Metropolitan Planning Organization (MPO) for northeastern Illinois, the Chicago Metropolitan Agency for Planning (CMAP) has a substantial interest in ensuring that the Environmental Impact Statement (EIS) conducted under Docket No. FD 36873 for the proposed acquisition (the “Transaction”) of Norfolk Southern Corporation by Union Pacific Corporation (the “Applicants”) thoroughly evaluates potential effects on communities throughout the region, including impacts to their transportation systems, environmental resources, and economic activity.

CMAP recommends the Office of Environmental Analysis include comprehensive evaluations of how the Transaction could influence rail capacity and operations, highway-rail and pedestrian crossings, passenger rail service, and truck traffic and roadway performance, as well as employment and broader economic outcomes. These assessments should be presented in detail at a localized scale — such as specific corridors, segments, terminals, or at-grade crossings — and supported with spatial data that local agencies can readily use. Where negative impacts are identified, the EIS should assess feasible mitigation strategies, specify accountable entities and funding mechanisms, and outline clear, measurable processes for oversight and enforcement.

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To ensure the EIS accurately captures the full range of potential community, transportation, environmental, and public-health impacts associated with the Transaction, CMAP urges the Surface Transportation Board to pursue additional, targeted analysis in several critical areas. The following key considerations represent priority issues where further data, clarification, corridor-level evaluation, and stronger accountability measures will be essential for producing a robust and actionable EIS:

- Quantify changes in delay, safety, and gate-down duration at all affected highway-rail and pedestrian crossings, with localized analysis at specific high-impact locations and a full assessment of travel pattern diversion and emergency response effects.
- Evaluate rail-network capacity across affected freight and passenger corridors to ensure increased freight volumes do not degrade Metra (the region's commuter rail) or Amtrak service, and disclose detailed operational assumptions, methodologies, and forecast reconciliations.
- Assess localized air-quality and public-health impacts in communities near corridors, yards, and terminals expected to experience increases in freight or truck activity, and identify feasible mitigation strategies.
- Examine truck-traffic increases at 47th Street, Global 2, and the Hegewisch auto ramp, including the effects on congestion, pavement conditions, and roadway system performance.
- Conduct a comprehensive hazardous-materials risk assessment addressing increased shipment volumes, population exposure, fleet condition, emergency-response readiness, and potential additional safety measures.
- Incorporate updated freight-traffic projections reflecting UP's expanded operating rights on Canadian National's Leithton and Matteson Subdivisions, and analyze how these changes could alter environmental impacts across northeastern Illinois.

Below are further details on specific considerations for the EIS in each of these key areas.

Highway-rail grade crossing safety and delay

The EIS should quantify Transaction-related changes in crossing delay and safety at every affected public highway-rail and pedestrian crossing in CMAP's jurisdiction. The analysis should address the impacts of any changes in train volume, speed, weight, and length, as each of these variables could increase gate-down time. It should also consider any negative impacts on public safety, emergency response, transit operations for the CTA and Pace bus service and access to jobs and other essential services.

These issues are especially acute at the following six highway-rail crossings, three of which are grade separation projects proposed in the Chicago Region Environmental and Transportation Efficiency (CREATE) Program:

- Crossings 173996K (CREATE project GS12, 1st Avenue) and 173998Y (CREATE project GS8a, 5th Avenue)
- Crossings 243177N (CREATE project GS3a, South Morgan Street) and 243205P (South Racine Avenue)
- Crossing 174964H (Winfield Road)
- Crossing 174973G (Washington Street)

For each grade crossing where freight rail traffic is expected to increase under the Transaction, the EIS should include a crossing-specific assessment of safety and delay impacts, including the following:

- The EIS should analyze existing and forecasted conditions, including gate activations, gate-down durations — particularly any exceeding ten minutes — blocked-crossing frequency, queue lengths, total person-delay, crash exposure based on historical collision data, and emergency-response delays. All modeling should be validated with field observations and automated gate-monitoring data, with any discrepancies clearly explained and corrected.
- The analysis should adopt a corridor-wide perspective to capture how increased freight traffic may alter travel patterns, divert users to adjacent crossings, or affect county and municipal roadway operations. Where impacts are identified, the EIS should evaluate appropriate mitigation strategies, determine where they are warranted, and specify the Applicants' fair share of costs. These strategies may include grade separations, crossing consolidations, signal coordination, intelligent transportation systems, improved pedestrian treatments (including the abatement of trespassing), and enhanced emergency-notification systems.

- The EIS should solicit commitments from the Applicants necessary to avoid delays in advancing public-agency mitigation projects, including deadline enforcement, the waiver of Applicant engineering review fees, and effective coordination on design, right-of-way, and construction matters.
- The EIS should require continuous monitoring of train counts and gate-down times throughout its oversight period, with public reporting and a mechanism to trigger additional mitigation if actual impacts exceed those forecast in the EIS.

Rail capacity

The Transaction would increase freight trains and tonnages on several corridors used for passenger rail service, including:

- Metra's Union Pacific West line, segments 10235 through 10238. Transaction-related train counts are forecast to increase by 21 percent between Proviso and Kedzie and by 6 to 14 percent between Elburn and Proviso. Tonnages on these segments are forecast to increase by approximately 29 percent and 108 percent, respectively.
- Several east-bound Amtrak lines that use the NS Chicago Line between Chicago and northwest Indiana, including the Blue Water, Capitol Limited, Lake Shore Limited, Pere Marquette, and Wolverine lines. Transaction-related train counts are forecast to increase by 23 percent on segment 12307 and by 9 percent on segment 10058. Tonnages on these segments are forecast to increase by approximately 63 percent and 28 percent, respectively.
- Metra's Heritage Corridor, the Amtrak Lincoln Service, and the Amtrak Texas Eagle which use the Brighton Park crossing to cross the CSX Blue Island Subdivision, segment 12702, where the Transaction is forecast to increase the number of freight trains by 163 percent and the tonnages by 197 percent.

As a result, the EIS should determine whether the rail network has sufficient capacity to absorb increased freight volumes without degrading existing or planned passenger rail service. To do so, a comprehensive assessment of passenger rail impacts along all affected corridors should be performed, including the following:

- The EIS should seek additional data on Transaction-related passenger rail effects beyond what is included in the Applicants’ response to Decision No. 21, including train length, speed, direction, and time-of-day and day-of-week distributions for each affected segment. The EIS should also disclose all methods and performance standards used to determine “adequate capacity,” such as assumed dwell times, headways, junction occupancy, yard movements, crew availability, dispatching protocols, temporary slow orders, and maintenance needs. Any inconsistencies between the original (December 19, 2025) and revised (April 30, 2026) freight forecasts should be explained and reconciled.
- The EIS should evaluate current and projected operational practices — including blocking and classification, interchange, crew changes, dispatching, and the location and duration of stopped trains — and assessing how these changes may affect passenger service under normal conditions, incidents, extreme weather, maintenance closures, or demand surges. Where impacts to passenger rail are identified, the EIS should examine potential mitigation options which the Applicants could deploy.
- The EIS should assess planned and potential projects that remove freight-passenger conflicts and determine whether targeted capital improvements are needed to safely and reliably accommodate the Transaction. This includes consideration of relevant CREATE Program investments such as the Rock Island Connection and the Brighton Park Flyover.
- The EIS should identify freight segments that may be abandoned or underutilized after the Transaction and evaluate opportunities to transfer these segments — or associated spurs — to passenger rail agencies or local governments for expanded rail service or trail development.
- The EIS should account for future passenger rail expansion required under Illinois Public Act 104-0457, which established the Northern Illinois Transit Authority and directs the region to transition toward a regional rail service model with more frequent Metra service. Merger-related increases in freight activity must not constrain the region’s ability to meet these statutory obligations or advance a more connected transit network. The EIS should evaluate how projected freight volumes could affect future passenger service growth and identify measures needed to preserve sufficient rail capacity for planned expansions.

Air quality

The Transaction's proposal to consolidate freight activity on certain segments and in specific yards/terminals may pose an adverse air quality impact in surrounding communities. Potential impacts may be felt in many areas across the region, including parts of UP's Geneva subdivision (segments 10235-10238) and near Global 2, 47th St., and the auto ramp in Hegewisch. Increased emissions would adversely affect public health in surrounding communities, including some that already experience elevated rates of health conditions linked to air pollution, such as asthma and other respiratory diseases. The EIS should provide air quality analysis in communities/segments experiencing increased freight rail and truck activity to quantify the true nature of the Transaction's public health impacts. Mitigation — such as cleaner locomotive technologies, idling reduction, and future air monitoring — should be considered.

Truck traffic

Applicants project that the Transaction would cause truck traffic to increase above Surface Transportation Board thresholds at three locations in northeastern Illinois: 47th St., Global 2, and the Hegewisch auto ramp. The EIS should examine existing and projected congestion and pavement conditions in these areas to contextualize the future impact from additional vehicles on the roadways.

Hazardous materials

The EIS must fully evaluate how the merger's substantial increase in hazardous-material shipments through densely populated communities heightens spill and explosion risks. For example, hazardous material movements would rise by 85 percent along the Kedzie-Brighton Park corridor and by 18 percent on UP's Geneva Subdivision between Proviso and Kedzie. The EIS should assess population density along affected and potential alternate routes, the condition of the tanker-car fleet and opportunities to accelerate upgrades to safer designs, the adequacy of spill-prevention and emergency-response procedures — including training and equipment for first responders — and the need for additional safety measures such as speed restrictions for certain cargoes.

Unknown impacts from agreement

In July 2026, Union Pacific and the Grand Trunk Corporation (CN) announced the signing of a binding Memorandum of Understanding that, in part, provides UP with expanded operating rights over CN's Leithton and Matteson Subdivisions. The Leithton and Matteson Subdivisions comprise an important route around the most congested rail segments in northeastern Illinois, and UP's expanded access to this route could significantly change traffic projections contained in the Application. The EIS should secure updated rail traffic projections and explore how expanded access to CN would affect traffic patterns and environmental impacts in northeastern Illinois.

Thank you for the opportunity to comment on the proposed scope of the EIS process. We look forward to working with your office as you review the environmental impacts of this merger and identify measures to mitigate them.

Sincerely,

A handwritten signature in black ink, appearing to read 'Erin Aleman', with a stylized, cursive script.

Erin Aleman
Executive Director