

Danielle Gosselin
Director Office of Environmental Analysis
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Re: Union Pacific–Norfolk Southern Proposed Transaction
STB Docket No. FD 36873
Preliminary Environmental Comments

Dear Danielle Gosselin,

As the region’s Metropolitan Planning Organization, SEMCOG supports coordinated local planning among over 185 local government units across seven counties in Southeast Michigan. SEMCOG’s regional policies and actions serve as strategies to improve a thriving regional economy by facilitating efficient movement of goods while mitigating conflicts between transportation modes and enhancing community health and safety.

The proposed UP–NS Transaction (STB Docket No. FD 36873) would have potential impacts in Southeast Michigan that should be evaluated in the Environmental Impact Statement (EIS). SEMCOG is requesting that the Office of Environmental Analysis (OEA) consider the environmental issues identified in the following comments.

Summary of SEMCOG Comments

- **Inclusion of Additional Rail Infrastructure and Grade Crossings**
 - The EIS should evaluate rail lines and grade crossings along NS trackage including Conrail and CN-owned rail segments.
 - The EIS should include the Delray Interlocking at Dearborn Street (Crossing No. 477272G), which is owned by Conrail.
- **Re-evaluate Associated Trucking Activity Increases**
 - The EIS should re-evaluate the baseline trucks per day figure at the Detroit Livernois intermodal facility evaluate the potential increase in truck traffic associated with changes in intermodal activity and drayage activity at surrounding both Livernois Intermodal terminal and the Melvindale automotive facility. This should include impacts

on roadway congestion, air quality impacts on the surrounding communities, and associated safety concerns.

- **Evaluate Associated Environmental Impacts of Increased Lifts per Day and Increased Train Lengths**
 - The EIS should evaluate potential air quality and at-grade crossing impacts associated with increased train activity and longer trains, which could result in more frequent or prolonged blocked crossings and increased vehicle idling.
 - There should be targeted infrastructure improvements on roads between yards which have heavy trans-shipment traffic to mitigate noise and air quality impacts.
 - The applications should also involve local communities where operational or capital improvements are scheduled.
- **Commuter and Intercity Rail Operations**
 - The transaction should not hinder on-time performance standards and existing operating/rail timetable agreements with Amtrak, commuter, and other intercity passenger rail operators. The merger should also not impact proposed future intercity passenger rail service expansion.

Southeast Michigan-area network impacts

The SEMCOG region is served by four Class I railroads that collectively operate across approximately 900 miles of track. Norfolk Southern (NS) owns approximately 100 miles of track within the region and operates on at least 200 miles, including track segments owned by Conrail, an NS subsidiary, and Canadian National Railway (CN). The region also contains approximately 1,050 at-grade railroad crossings, with NS operating across approximately 190 of these crossings. **Appendix A** provides reference maps of the regional freight network.

Inclusion of additional Rail Infrastructure and Grade Crossings

The NS-owned rail line extending north from the Michigan–Ohio border to the City of Detroit connects to a Conrail-owned segment, which then connects to a Canadian National (CN) Railway line before splitting to connect with both a CSX line and an NS-owned line. The UP-NS Response to OEA Request #3 identifies three public roadway/rail at-grade crossings along this corridor that exceed the STB's thresholds for environmental review (DOT #: 477273N, 477274V, 477275C0).

While the at-grade crossings located on the Conrail and CN segments are not included in the application's crossing analysis, they are part of the same operational corridor and are likely to experience increased train activity resulting from the proposed merger. Given the high concentration of at-grade crossings and the existing congestion and community impacts in Southwest Detroit, these crossings should also be evaluated to provide a more comprehensive assessment of the merger's potential effects on the transportation network and surrounding communities. More specifically, the Delray Interlocking at Dearborn Street (Crossing No. 477272G), is a critical junction within this rail corridor, which is currently a chokepoint for both rail and vehicle traffic and may experience additional operational impacts associated with the proposed merger and should be included in the EIS. **Appendix A** provides a reference map of Southwest Detroit rail operators and crossings.

Associated Trucking Increase

The merger application projects a **102%** increase in daily truck trips at the Detroit Livernois Intermodal Terminal and a **60%** increase at the Melvindale autoramp within five years post transaction. These increases are a concern given the concentration of rail facilities and container storage yards in Southwest Detroit and ongoing efforts to manage local truck impacts. It is unclear whether the application fully accounts for existing and growing intermodal drayage activity in its truck trip projections.

The baseline truck volumes used for the Detroit Livernois intermodal facility may be undercounted, which would understate the Transaction's projected impact on an already overburdened community.

- The EIS should re-evaluate the baseline trucks per day figure at the Detroit Livernois intermodal facility
- In addition, the EIS should evaluate the potential increase in truck traffic associated with changes in intermodal activity and drayage activity surrounding both Livernois Intermodal terminal and the Melvindale automotive facility.

Increase in Lifts Per-Day & Increased Train Lengths

The application indicates that NS Livernois intermodal facility in Detroit currently has a fluid capacity of 147,000 lifts per year. Applicants project that Livernois will require post-transaction capacity of approximately 209,000 lifts per year. Applicants expect to accommodate this growth through pre-merger investment. The application states that in 2026, NS plans to begin a major terminal expansion at Livernois, funded through a combination of public and private investment.

The project will deliver 6,175 feet of new working track, 2,000 additional stack slots, and 200 parking stalls, along with a new automated gate and upgrades to the operating surface and improved lighting, drainage, and security. Scheduled for completion by 2029, this expansion will increase Livernois's annual capacity to 277,000 lifts, which the application indications will be sufficient for projected post-merger demand.

- There should be targeted infrastructure improvements on roads between yards which have heavy trans-shipment traffic to mitigate noise and air quality impacts.
- The applications should also involve local communities where operational or capital improvements are scheduled.

Additionally, the potential for increased train lengths is a concern for the region, particularly given differences in train lengths between UP and NS operations. Longer trains could result in more frequent or prolonged grade-crossing blockages. In Southwest Detroit and other communities in the region, where blocked railroad crossings already contribute to roadway congestion, additional train-related delays could increase traffic congestion, vehicle idling, and associated air quality impacts. Blocked crossings may also create safety and emergency response concerns, including motorists attempting to cross ahead of approaching trains, pedestrians climbing under or between stopped railcars to reach schools or other destinations, and delays to EMS and other emergency responders when crossings are blocked.

Air quality Impacts

These potential impacts are particularly relevant to Southeast Michigan's efforts to protect air quality and quality of life. As the designated lead local air-quality planning agency under the federal Clean Air Act, SEMCOG is involved in a number of activities to help attain and maintain national air quality standards in the region. As rail and truck activity increases, the potential for additional truck traffic around rail/truck terminals and prolonged blocked crossings should be considered alongside other regional transportation and air-quality impacts.

Although EPA has not yet finalized area designations under the revised annual PM_{2.5} National Ambient Air Quality Standard, Michigan's Department of Environment, Great Lakes and Energy has recommended that Wayne County be designated nonattainment, reflecting continuing concerns regarding fine particulate matter concentrations and localized exposure risks within the county. These concerns have also prompted significant local investment in air quality monitoring beyond the regulatory network, including a countywide community monitoring initiative led by the Wayne County Department of Health, Human and Veterans Services and supplemental monitoring efforts by the City of Detroit designed to better understand neighborhood-scale pollution impacts,

particularly in Southwest Detroit and other communities located near major freight, industrial, and transportation corridors.

Given the pending PM2.5 designation process and the substantial public investment in monitoring localized air quality conditions, the EIS should evaluate whether the proposed transaction could contribute to localized particulate matter impacts through increased rail activity, expanded intermodal operations, additional truck trips, and prolonged vehicle idling at blocked crossings. The analysis should not be limited to regional emissions totals but should also assess potential impacts on Southwest Detroit and adjacent environmental justice communities where monitoring programs have been established to identify pollution hotspots and address longstanding public health and air quality concerns.

Commuter and Intercity Rail Operations

Currently, AMTRAK operates two routes in the SEMCOG region where NS has trackage rights, the Wolverine service which connects passengers from Chicago to Detroit and metro Detroit and the Blue Water service, which connects Chicago to Port Huron. SEMCOG is concerned that the transaction would hinder future planned passenger service along these routes. As described on Page 932 of the application, "...Applicants expect that the merger will add freight trains to all of the routes used by Amtrak services that operate over NS's lines." This includes both the Blue Water and the Wolverine service. OEA should evaluate the transaction's impact on the quality and reliability of intercity passenger rail service along both corridors.

- The transaction should not hinder on-time performance standards and existing operating/rail timetable agreements with Amtrak, commuter, and other intercity passenger rail operators. The merger should also not impact proposed future intercity passenger rail service expansion.

Sincerely,

A handwritten signature in cursive script, reading "Amy O'Leary".

Amy O'Leary
Executive Director
SEMCOG