



September 18, 2026

Ms. Elizabeth Webster
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Wade Kapszukiewicz
Mayor

mayor@toledo.oh.gov
phone 419-245-1001
fax 419-245-1370
One Government Center
Suite 2200
Toledo, Ohio 43604
toledo.oh.gov

RE: Docket No. FD 36873

To the Office of Environmental Analysis:

The City of Toledo appreciates the opportunity to provide preliminary comments regarding the environmental review of the proposed Union Pacific acquisition of Norfolk Southern. The purpose of this letter is neither to support nor to oppose the proposed transaction. Rather, the City submits this letter to provide information about existing local conditions and to request that potential impacts to Toledo residents be considered as the Office of Environmental Analysis develops the Environmental Impact Statement (EIS).

Grade Crossings and Truck Traffic

With 103 active grade crossings located in Toledo, our community regularly experiences the effects of blocked crossings, which cause significant travel disruptions for motorists and delays for emergency responders. According to data provided in the Union Pacific-Norfolk Southern public application materials, two grade crossings in Toledo on Norfolk Southern's Chicago Line, at Oakdale Avenue (#509436M) and Holland-Sylvania Road (509457F), would experience significant increases in train traffic as a result of the proposed transaction.

These crossings already carry a high volume of train traffic (approximately 41 and 48 trains per day, respectively), and frequently experience extended delays of 38-48 minutes on average. Both crossings are located on important roadways that carry high traffic volumes (approximately 7500 and 8500 vehicles per day, respectively) and service essential daily destinations, including schools, healthcare facilities, and major employment centers.

The Surface Transportation Board's Data Explorer also projects a drastic increase in daily truck traffic in and out of Toledo's Airline intermodal yard, with a 5-year transaction-related growth from 102 to 402 trucks per day. This increase of 252% is identified as exceeding the Board's threshold for truck traffic. Two of the primary roadways that would carry this increased traffic, Hill Avenue and Detroit Avenue, travel through densely populated residential areas and service several schools. Both roadways are located on the City's High-Injury Network, which identifies the roadways with the highest rates of fatal and serious injury crashes.

Because Toledo already experiences significant impacts from extended crossing blockages on the Chicago Line and from truck traffic servicing the Airline intermodal yard, the City respectfully requests that the EIS evaluate the extent to which transaction-related increases in train traffic could exacerbate these existing conditions. Specifically, we request that the environmental review consider:

- The frequency and duration of blocked grade crossings in Toledo,



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→ toledo.oh.gov

- particularly the Oakdale Avenue and Holland-Sylvania Road crossings;
- Effects of crossing blockages on local traffic, safe and timely travel to schools, and pedestrian safety;
- Effects on emergency response times; and
- Potential noise, air quality, and safety impacts associated with blocked crossings and truck traffic in and out of the Airline intermodal yard.

Hazardous Materials

The Data Explorer identifies three segments of Norfolk Southern line in Toledo (12315, 10187, and 12086) that would see transaction-related growth in the number of daily hazardous material carloads carried. Both of these segments travel through densely populated areas; on the two segments of the southern end of the Detroit Line in particular, which travel more than six miles through Toledo, a release of hazardous materials resulting from a derailment, collision, or other rail incident could endanger the health and safety of tens of thousands of residents.

The City of Toledo asks that the environmental review process consider the potential risks associated with increased hazardous materials transportation through a densely populated urban area particularly carefully. We request that the review evaluate:

- The types and quantities of hazardous materials reasonably expected to be transported on these routes and the frequency with which they would be reasonably expected to be transported;
- The potential for derailments, collisions, or other incidents involving hazardous materials;
- The potential consequences of a release for residents, businesses, soil, groundwater, waterways, and public infrastructure and facilities; and
- The ability of local emergency responders to safely and effectively respond to a rail incident involving hazardous materials.

As an important hub in the national freight rail network, Toledo recognizes the need for an efficient national freight transportation system. For the same reason, we are particularly mindful of the fact that the potential environmental, safety, and community impacts of the proposed transaction must be carefully considered alongside its potential benefits. We respectfully request that the Office of Environmental Analysis give Toledo's local conditions its full and careful consideration as the Environmental Impact Statement is developed. Thank you for your consideration.

Sincerely,

Wade Kapszukiewicz
Mayor, City of Toledo