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Via Electronic Filing

Chief of Case Administration
Office of Chief Counsel
Surface Transportation Board
395 E Street S.W.
Washington, D.C. 20423-0001

Re: **Docket No. FD 36873, *Union Pacific Corporation and Union Pacific Railroad Company – Control – Norfolk Southern Corp. et al.*; Preliminary Environmental Comments of Cobb County School District**

Members of the Surface Transportation Board:

The undersigned and this firm represent the Cobb County School District (the "**School District**"). The School District appreciates the opportunity to provide preliminary comments in response to the Office of Environmental Analysis' ("**OEA**") August 19, 2026 consultation letter. Based on the information currently available, the School District cannot determine whether or how the proposed control transaction (the "**Transaction**") may affect the School District's schools, students, employees, or transportation operations within Cobb County, Georgia ("**Cobb**"). The available materials do not identify Cobb-specific changes in train traffic, rail operations, facility activity, or capital projects.

The available materials indicate that Norfolk Southern rail infrastructure runs through Cobb and identify the existing Whitaker/Austell intermodal facility. For initial screening, the School District has identified Austell Elementary School, Mableton Elementary School, Lindley Middle School, and South Cobb High School as facilities within this area. This does not establish that any of those schools will be affected. OEA should treat schools and school transportation as sensitive receptors and use localized information to identify the School District facilities and routes that warrant analysis.

OEA should evaluate whether the Transaction could increase noise, vibration, or diesel emissions at or near School District facilities or along school transportation routes. The analysis should distinguish existing conditions from any Transaction-related change in train movements, switching, idling, intermodal activity, or related truck traffic.

OEA should also evaluate student and transportation safety, including any Transaction-related change in hazardous-material movements or in the frequency, duration, or timing of

blocked grade crossings. The analysis should consider effects on school bus routes, school arrival and dismissal, and emergency access to School District facilities.

The School District requests the underlying Cobb-specific information needed for that review. At a minimum, OEA should obtain and disclose GIS data showing relevant rail lines, rights-of-way, crossings, facilities, and proposed capital projects in relation to School District facilities and bus routes; baseline and projected rail traffic and operating information; grade-crossing and roadway-traffic data; and the location, scope, schedule, and anticipated operational effects of any Cobb facility or capital project. If any information cannot be publicly disclosed, OEA should provide enough localized analysis to allow the School District to understand and comment meaningfully on potential effects.

The School District does not take a position in these preliminary comments on whether the Surface Transportation Board should approve or deny the Transaction. School District respectfully requests that OEA include the issues identified above within the scope of the Environmental Impact Statement and continue coordinating with School District. If OEA identifies adverse effects on School District facilities or transportation operations, it should consult with the School District regarding appropriate mitigation.

Thank you for your consideration.

Sincerely,

Suzann Wilcox

Suzann Wilcox
Counsel for Cobb County School District