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September 21, 2026

Elizabeth Webster
Surface Transportation Board
Office of Environmental Analysis

RE: Comments of the City of Griffin regarding the Environmental and Municipal Impacts of the Acquisition of Norfolk Southern by Union Pacific, Docket No. FD 36873

Ms. Webster,

The City of Griffin, Georgia ("City") respectfully submits these comments regarding the proposed acquisition of Norfolk Southern by Union Pacific. The City recognizes the important role that freight rail transportation plays in the regional and national economy; however, the City is concerned that the proposed acquisition may substantially increase rail traffic, train length, train frequency, and railroad activity within our City, particularly in our downtown area.

The resulting impacts to our municipal infrastructure could be catastrophic, most notably from a public safety and emergency response perspective. Currently, there are times that the train blocks several crossings in our City that link the police and fire departments to the northside of town and back to the hospital. When that occurs, ambulances cannot complete calls because of lack of access, which requires the fire department to assist with calls that they may not be equipped to handle.

Additionally, there is only one bridge over the railroad in our community, leading to severe traffic congestion. Streets in our downtown area are categorized as minor arterial roads and major collectors. When the train blocks the tracks on the minor arterial road and the traffic is pushed to a major collector, the street is not designed for high volume traffic, which can lead to more traffic congestion, more roadway accidents, and accelerated pavement deterioration on local streets.

The railroad's operations directly intersect with infrastructure owned, operated, and maintained by the City, including public roads, drainage systems, telecommunication lines, electric lines, and water/sewer lines. An increase in rail traffic and/or train length will place additional demands on this infrastructure. For example, an increase in rail traffic and the resulting vibrations will increase leaks and breaks on water or sewer lines that cross or run parallel to the railroad tracks. In the City limits alone, there are over thirty lines that cross or run parallel to the railroad tracks that would be subject to damage based on an increase in rail traffic.

The proposed acquisition could result in additional demands on virtually every municipal department that operates in the City of Griffin. Police may experience increased traffic control and public safety responsibilities. Fire and emergency medical personnel may face additional response challenges. Public works employees may be required to address increased roadway and right-of-way impacts. Engineering and utility personnel may be required to review and respond to additional infrastructure issues. These are real costs to the City, even when they do not appear as direct expenses of the railroad.

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The Board should consider the cumulative fiscal and operational impacts of the proposed acquisition on affected local governments and should require the applicants to meaningfully engage with municipalities concerning mitigation, infrastructure improvements, emergency response, and cost responsibility. The City respectfully requests that the Board require Norfolk Southern and Union Pacific to engage directly with the City before implementation of the proposed acquisition to identify existing and anticipated impacts and develop appropriate mitigation measures.

At a minimum, the City requests consideration of the following:

1. Improvements to railroad crossings and approaches;
2. Measures to minimize crossing blockage and emergency response delays;
3. Improvements to affected roadways and intersections;
4. Protection and relocation, where necessary, of municipal utilities, at the railroad's expense;
5. Improvements to drainage and stormwater infrastructure;
6. Appropriate railroad participation in infrastructure costs attributable to increased operations;
7. Emergency response coordination and training;
8. Advance notification and communication protocols for significant railroad activities;
9. Procedures for addressing damage to City infrastructure;
10. Beautification of the right-of-way owned by the railroad; and
11. A mechanism for ongoing consultation between the railroad and the City following the acquisition.

The City supports efficient and reliable freight transportation and recognizes the importance of the railroad industry to the national and regional economy; however, economic benefits associated with this acquisition should not come at the expense of local governments and the communities in which the railroad operates. The City has a responsibility to protect its residents, maintain its public infrastructure, provide emergency services, and safeguard public assets. If the proposed acquisition results in increased rail activity, those responsibilities may become substantially more difficult and costly to fulfill.

The City therefore respectfully requests that the Surface Transportation Board fully evaluate the environmental, transportation, public safety, infrastructure, emergency response, and other municipal impacts of the proposed acquisition; require appropriate mitigation measures; and ensure that affected local governments are meaningfully consulted before implementation.

Respectfully submitted,

A handwritten signature in blue ink that reads "Jessica W. O'Connor".

Jessica W. O'Connor, City Manager

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