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

September 21, 2026

Subject – Docket No. FD 36873, Union Pacific Acquisition of Norfolk Southern

Director Gosselin:

The Utah Division of Wildlife Resources (DWR) has reviewed the proposed acquisition of Norfolk Southern Railroad by Union Pacific Railroad and provides the following comments.

Union Pacific Railroad has approximately 1,000 miles of rail lines in Utah. Sections of these rail lines intersect crucial habitats and migration corridors for mule deer, elk, and other wildlife species. Where wildlife habitats and rail corridors overlap, wildlife-train collisions have been observed. This is especially evident during the winter months on winter ranges for big game species.

The acquisition of Norfolk South Railroad by Union Pacific is projected to substantially increase train volumes on existing rail lines. Wildlife-vehicle collisions will likely increase as a result. Additionally, increased train volumes could also become a barrier to wildlife movement, impeding critical season movements. Exclusion fences and wildlife crossing structures at targeted locations could be used to reduce wildlife mortality and preserve wildlife movement. The DWR recommends that these mitigation measures be implemented and can provide support in determining locations and design.

Many road corridors in Utah have exclusion fences to reduce wildlife-vehicle collisions. Rail lines often parallel these fenced road corridors. Gates have been installed in the exclusion fences to allow railroad crews to access the tracks for regular maintenance. Railroad maintenance crews sometimes leave gates open for days or weeks, allowing wildlife to enter the road right-of-way. This creates a dangerous situation for drivers because wildlife become trapped within the road corridor. Increased train volumes will increase the need for track maintenance. DWR recommends that Union Pacific conduct training with employees to ensure gates remain closed when not in use.

We appreciate the opportunity to review this project. If you have questions please contact Daniel Olson, Impact Analysis Coordinator in our Salt Lake City Office, at danielolson@utah.gov or 385-415-4010.

Sincerely,

Michael Canning
Michael Canning (Sep 21, 2026 08:34:48 MDT)

Michael F. Canning
Deputy Director