

City of Detroit Environmental Impact Statement

Comments

September 18, 2026

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

RE: Docket No. FD 36873 — Union Pacific Corporation and Union Pacific Railroad Company—Control—Norfolk Southern Corporation and Norfolk Southern Railway Company; Initial Comments on Environmental Review

Dear Ms. Gosselin:

The proposed UP–NS Transaction (STB Docket No. FD 36873) would have substantial impacts in both the City of Detroit and our region. Detroit is home to legacy rail infrastructure that serves automotive and other industries core to the national economy, including Stellantis, General Motors, Marathon Petroleum, and numerous Tier 1 and Tier 2 automotive suppliers. Detroit is also the identified endpoint of one of the Transaction's new proposed direct corridors from the ports of Southern California, and the city hosts an international freight rail crossing with Canada. Together with several busy international freight gateways, multiple intermodal terminals generating continuous truck traffic between rail yards, drayage facilities, warehouses, and border crossings, and three of the busiest freight corridors/highways in the Midwest, these facilities make Detroit the endpoint of multiple national rail corridors and one of the most freight-intensive environments in the United States. Given this concentration of freight activity, the completeness and accuracy of the environmental review in this docket is of particular importance to the City, and it is against this backdrop that the City submits the following comments.

The City of Detroit submits these initial comments to respectfully urge the Office of Environmental Analysis (OEA) to evaluate the environmental issues we discuss below in the Environmental Impact Statement (EIS). We request the OEA do the following as it initiates the EIS process:

- include all public at-grade crossings along NS trackage is included in the scope,
- re-evaluate the baseline trucks per day figure at the Detroit Livernois intermodal facility and evaluate the cumulative impact of the additional trucks on the surrounding community,
- consider the cumulative impact of additional train traffic on nearby residential and institutional features, and
- account for the impact on the quality and reliability of the intercity passenger rail service that connects Detroit to other Michigan and Midwest regions.

Include all public roadway/rail at-grade crossings located along rail line segments identified in the Master Data Tables

The Master Data Tables substantially understate the crossing infrastructure affected by the Transaction in Detroit. Within the City of Detroit, the segments identified by Applicants encompass roughly 60 miles of track running through a dense urban environment (see Figure 1), yet the accompanying "Roadway & At-Grade Crossings (G1)" table lists only three crossings within city limits. The scope of analysis in the Master Data Tables fails to capture the infrastructure the Transaction will actually affect.

[illegible]

Based on our own review of Federal Railroad Administration (FRA) crossing inventory data cross-referenced against the segments identified in the Master Data Tables, the City has identified at least 32 additional public at-grade crossings within Detroit that sit along NS-operated segments but are owned by CSX or Conrail and were not included in Applicants' analysis (see Table 1). These crossings should be evaluated on the same basis as the

crossings Applicants did include, since the environmental effects of increased train traffic — delay, noise, vehicle queuing, and safety risk — do not depend on who holds title to the rail beneath the trains.

Table 1: Crossings along NS Trackage Rights in Detroit

Crossing ID	Street	Latitude	Longitude	Railroad Code
477242P	W JEFFERSON/W GRA	42.31257	-83.0815	CSX
477243W	VINEWOOD DELRAY	42.3122	-83.0823	CSX
477244D	SWAIN STREET	42.31157	-83.0836	CSX
477245K	SCOTTEN AVENUE	42.3107	-83.0856	CSX
477246S	CLARK AVENUE	42.30968	-83.0882	CSX
477247Y	MC KINSTY AVENUE	42.30916	-83.0895	CSX
477252V	FERDINAND AVENUE	42.3082	-83.0919	CSX
477253C	MORRELL AVENUE	42.30773	-83.0931	CSX
477254J	JUNCTION AVENUE	42.30728	-83.0942	CSX
477255R	CAMPBELL AVENUE	42.30646	-83.0962	CSX
477257E	MILITARY AVENUE	42.30526	-83.0993	CSX
477265W	GREEN AVENUE	42.30036	-83.1115	CSX
477269Y	WEST END AVENUE	42.29772	-83.1174	CSX
477270T	HARBAUGH AVENUE	42.29489	-83.1245	CSX
477272G	DEARBORN AVE	42.29313	-83.1296	CSX
511626R	DEARBORN ST	42.29308	-83.1287	CSX
511945J	CENTRAL AVE - MAIN	42.3224	-83.1314	CRSH
511948E	CENTRAL AVE	42.32185	-83.131	CRSH
512335E	OAKWOOD AND DIX	42.28598	-83.1603	CRSH
512341H	MELLON ST	42.28956	-83.1659	CRSH
512363H	LONYO AVE	42.32096	-83.1376	CRSH
512422H	CYMBAL ST	42.38832	-83.0347	CRSH
512425D	MILLER ST	42.39039	-83.0348	CRSH
512427S	GEORGIA ST	42.39348	-83.035	CRSH
512431G	HUBER RD	42.39755	-83.035	CRSH
859081D	LYNCH RD	42.4048	-83.0346	CRSH
859086M	DEVINE ST	42.3984	-82.9967	CRSH
859087U	ST JEAN ST	42.39105	-82.9863	CRSH
859089H	HARPER AVE	42.39585	-82.9942	CRSH
859090C	SHOEMAKER ST	42.39064	-82.9853	CRSH

859091J	E WARREN AVE	42.38866	-82.9799	CRSH
867406F	ERWIN AVE	42.40249	-83.0183	CRSH

One crossing in particular warrants the OEA's attention: FRA crossing inventory number 477272G, located on Dearborn Avenue as part of the Delray Interlocker. FRA data indicate this crossing already carries at least 29 trains per day, making it among the busiest at-grade crossings in Detroit and Southeast Michigan. It is already a well-documented chokepoint for both rail and vehicle traffic in the area. Any transaction-related increase in train volume through this location — without inclusion in the environmental review — would leave the Board unable to evaluate a foreseeable and significant impact on other railroads operating at this junction and the surrounding community.

Ensure the accuracy of baseline numbers used for analysis

The baseline truck volumes used for the Detroit Livernois intermodal facility appear to be undercounted, which would understate the Transaction's projected impact on an already overburdened community. The City requests that the Board undertake a deeper investigation into the baseline numbers used to project the Transaction's impact at the Detroit Livernois intermodal facility. If the baseline number of trucks currently accessing a facility is undercounted, then the transaction-related growth calculated from that baseline, and the resulting projected trucks per day, will be undercounted as well, regardless of how accurate the growth percentage itself may be.

The Master Data Table provided by Applicants uses a baseline of 315 trucks per day at the Livernois facility and projects 102.3% growth related to the Transaction, resulting in a projected additional 361 trucks per day compared to a no-transaction scenario. Based on the City's own data, we have reason to believe this baseline substantially understates current conditions at the facility. The City of Detroit's traffic management technology provides real, granular-level traffic volumes at more than 300 intersections citywide, including the intersection at the entrance to the Livernois intermodal station. Our traffic cameras regularly capture between 360 and 465 daily trucks accessing the facility as of 2026 — a range that already exceeds, on its low end, Applicants' baseline figure, and on its high end, exceeds Applicants' baseline by nearly 50%.

This discrepancy matters a great deal to the community surrounding the Livernois facility. That community already bears a disproportionate share of truck traffic and the environmental and public health consequences that come with a truck-dense environment — air quality impacts, noise, vibrations, vehicle emissions, traffic safety, roadway wear, and safety risks at surrounding intersections. If the Transaction's baseline understates

existing truck volumes, then the incremental burden the Transaction would place on this community will be understated as well, and the Board and public will be left without an accurate picture of the facility's true post-transaction impact. Correcting the baseline is necessary not only to ensure an accurate projection of transaction-related growth, but to allow OEA to meaningfully assess the full cumulative impact that additional truck traffic at this facility will have on residents who already live with the consequences of intensive freight activity every day. The City would welcome the opportunity to share its traffic volume data with the Board and Applicants for their consideration in refining this baseline.

The accuracy of the baseline numbers is particularly important given the character of the community surrounding the intermodal facility and the substantial public investment already directed at mitigating truck traffic burdens in this area. The community surrounding the Livernois facility is particularly ill-suited to absorb an underestimated increase in truck traffic. It is composed of densely populated neighborhoods with among the highest proportion of children under age five and uninsured residents in the city, populations that are especially vulnerable to the health effects of vehicle and diesel emissions. Air pollution has long been a persistent concern in Detroit: the city's limited public transportation options and extensive urban sprawl have driven heavy reliance on private vehicles and freight transport, and Detroit already records the highest PM_{2.5} levels in Michigan, exceeding national standards. Mobile sources — including particulate matter, diesel exhaust, volatile organic compounds, carbon monoxide, and nitrogen oxides — are among the primary contributors to this burden, and the number of emission permits issued in Detroit has grown by nearly 25% over the last five years, giving the city the largest concentration of such permits in the state. The resulting health burden falls on a large and vulnerable population, with documented links between these exposures and severe health impacts, including elevated mortality risk, a problem compounded by the proximity of emission sources to residential neighborhoods and the age of much of the city's housing stock, which often lacks adequate air filtration or conditioning.

This challenge is especially acute in Southwest Detroit, where Detroit's diverse industrial base of power plants, incinerators, refineries, steel mills, and manufacturing facilities converges with heavy mobile-source traffic. Over 350 facilities in the area are listed in the U.S. EPA's National Emissions Inventory, with hundreds more now subject to the City's 2024 fugitive dust ordinance, and major point sources cluster throughout Southwest Detroit alongside additional concentrations elsewhere in the city and region. Against this backdrop of industrial activity, dense traffic, and infrastructure already under strain, any

material underestimate of the Livernois facility's truck traffic baseline would compound an air quality and public health burden that this community already disproportionately bears.

Federal, state, and local agencies have also committed hundreds of millions of dollars in public funds toward addressing these impacts, including grants from the Federal Railroad Administration, the Federal Highway Administration, the U.S. Environmental Protection Agency, Michigan's Department of Environment, Great Lakes, and Energy, and the Michigan Governor's Office, alongside the City of Detroit's own investments. The City has separately commissioned multiple studies on truck traffic in the area to help establish designated truck routes, and is preparing to launch a commercial motor carrier enforcement unit dedicated to truck compliance in the surrounding neighborhoods. Layering additional truck volume onto this facility without accounting for its true baseline — and without corresponding mitigation commensurate with the actual increase — risks undermining the return on this significant public investment before it has had the chance to take effect.

Additionally, though the Melvindale automotive facility is not located within the city's boundaries, it is sited less than a mile from the same area, Southwest Detroit, that the Livernois intermodal facility is in. Given the connection between the goods being shipped at the facility (e.g. automotive) and the substantial number of automotive shippers located within Detroit's borders, we request the environmental analysis include the impact of the additional truck traffic generated by the Melvindale facility on Detroit's communities.

Consider the effects of additional train traffic on our city's homes and schools

In the EIS, the OEA should account for the cumulative environmental and health consequences of additional train traffic near homes and schools along segments exceeding the Board's thresholds under 49 C.F.R. § 1105.7(e)(5). As detailed above, Detroit is already an overburdened environment: the city carries some of the highest PM_{2.5} levels in Michigan, hosts a dense concentration of industrial emission sources, and sits at the convergence of major freight corridors, freeways, and an international border crossing that together generate a persistent and cumulative air quality and public health burden on surrounding communities. Additional diesel train traffic along segments running through non-attainment areas would not occur in isolation — it would compound burdens that these same communities already carry from mobile-source and industrial emissions, and we request the Board's analysis reflect that cumulative reality rather than treating each transaction-related increase as a standalone effect.

The City has identified sensitive residential and institutional features located along and adjacent to specific rail segments in Table 2 and the accompanying maps in Figures 2, 3, and 4 to illustrate their proximity to the affected rail segments.

Table 2: Sensitive Features along NS Rail Segments

Segment Key	Sensitive Feature	Crosses Board Threshold?
124953	Homes	Yes
12338	Homes	Yes
11889	Homes, Wayne County Community College Campus – Downtown Eastern Campus	Yes

We ask that OEA use this information to ensure the EIS meaningfully evaluates noise, air quality, vibration, and safety impacts at these specific locations, rather than relying solely on segment-level or system-wide averages that may obscure concentrated, localized impacts on the children and families living and attending school along these corridors.

Map Legend	
	Sensitive features along segments
	No
	Yes
	Yes (Hazardous)
Segments Included in Master Data Tables (and whether they were indicated to exceed Board's thresholds under 49 C.F.R § 1105.7(e)(5))	

A map of an urban area in St. Louis, Missouri, centered around Mount Elliott St and Georgia St. A red line, representing a proposed or existing transit route, runs vertically along Mount Elliott St, passing through Georgia St, Oliver St, and Dorothy Ave. A green dashed line, representing another proposed or existing transit route, runs diagonally from the bottom left towards the top right, passing through Conant St, Dwyer St, and Strong St. The map shows a grid of streets including Talbot St, Casmere St, Harold St, Prescott St, Caniff St, Mount Elliott St, Huber St, Hedge St, Marcus St, Domine St, Dodge St, Georgia St, Oliver St, Dorothy Ave, Selkirk St, Farr St, Strong St, Conant St, Dwyer St, Miller St, Girardin St, Sherman St, Concorde St, Helen St, Carrie St, and Lynch Rd. A green dot is located at the intersection of Mount Elliott St and Farr St. The map also shows a black line representing a boundary or a different type of route, and a red line representing a different type of route. The map is labeled with street names and route numbers.

Figure 4: Segment Key 124953 and Sensitive Features



Consider the impacts on our city's access to high-quality intracity passenger rail

We also request the OEA evaluate the Transaction's impact on the quality and reliability of intercity passenger rail service along the Wolverine Corridor. The City requests that OEA's environmental review also consider the downstream effects of increased freight train traffic on Amtrak's Wolverine Corridor service, which connects Detroit to Pontiac and Ann Arbor locally, and to Battle Creek, Kalamazoo, and Chicago regionally. This corridor is a significant piece of transportation infrastructure for Detroit and the broader region, providing residents, workers, and visitors with an alternative to automobile travel between Michigan's major population and economic centers and linking Detroit directly into the Chicago hub and the wider national passenger rail network. That connectivity supports regional labor mobility, tourism, and commerce, and its continued reliability is a matter of real economic significance to the City and the communities the corridor serves.

The westernmost portion of the Wolverine Corridor operates over trackage in the Chicago region and northwest Indiana, and most of the eastern portion operates over trackage from Kalamazoo to Dearborn, that the Transaction proposes to use for substantially increased freight volumes. Because passenger and freight trains share this infrastructure, additional freight traffic on these same segments has direct implications for passenger service, and the City is concerned that the Revised Application does not propose any infrastructure upgrades to these rail segments to accommodate this growth. Absent such upgrades, the same physical infrastructure will simply be used more intensively, which raises several

concerns the OEA should evaluate, including reliability — additional freight movements on shared trackage increase the likelihood of dispatching conflicts, delays, and schedule disruptions for passenger service; passenger safety — track and signal infrastructure that is not upgraded but is subject to materially higher utilization can be expected to experience faster wear and degradation, with corresponding safety implications; cost — reduced reliability and increased maintenance needs on shared infrastructure can translate into higher operating costs that may ultimately be reflected in consumer fares for passenger service; broader service quality metrics that the Board and Federal Railroad Administration typically track for shared-use corridors, including on-time performance, dwell and delay time attributable to freight interference, and capacity for future service frequency improvements.

Additionally, the City is concerned that the Applicants' Operating plan only addresses how they will maintain current passenger service levels on their new infrastructure network, suggesting that future additional passenger service would not be a priority. Given this and other regions' experience working with Class I railroads on adding passenger rail to busy freight corridors, the City is skeptical that Applicants' plans for increasing freight rail service will accommodate potential future passenger rail needs. Public agencies in Michigan are already cooperating to develop projects to increase daily Wolverine services in the next ten years – the Applicants' hesitance to accommodate additional services would threaten the hundreds of millions of dollars and years of work that would have already been spent to enhance our region's passenger rail connectivity.

Given that the Wolverine Corridor is a critical connector for Detroit's regional economy, the City asks that the EIS specifically assess how transaction-related freight growth on shared segments in other parts of the Wolverine corridor would affect passenger service metrics, and that it consider what mitigation or infrastructure investment commitments, if any, would be necessary to prevent the Transaction from degrading or preventing future passenger rail service that the City and the region rely upon.

The City appreciates the opportunity to provide these initial comments and looks forward to working with OEA throughout the environmental review process.

Sincerely,

Sam Krassenstein
Deputy Director, DPW
City of Detroit