



Minority Leader

Nickie J. Antonio
State Senator 23rd District

Committees

Transportation - *Ranking*
Rules & Reference - *Ranking*
Joint Legislative Ethics
Legislative Service Commission

September 21, 2026

Chairman Patrick J. Fuchs
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Dear Chairman Fuchs,

Below please find my comments on the Environmental Impact Study in relation to the proposed merger of Union Pacific and Norfolk Southern.

Local and Regional Effects

As Ohio Senate Democratic Leader and State Senator representing District 23, my constituents would be greatly affected by this merger. This merger would have a substantial local and regional impact on my district and the communities I serve. Locally, this merger would make the Rockport corridor the busiest stretch of the Norfolk Southern Railroad in Ohio, increasing from around 46 trains per day to 60, while also increasing tonnage by 33.7%. The railroad in Lakewood would not see an increase in train frequency, but tonnage would increase by 46%. When a block or overload occurs in a network of railcars, the whole network feels the impact. Increased trip frequency and weight will strain already stressed infrastructure, create louder and more frequent horn blasts, and lengthen blockages and wait times for other trains and local traffic in the community.

Regionally, this merger would also significantly change Cuyahoga County. The Maple Heights intermodal terminal would increase truck moves by 172 per day, raising drayage to an additional 63,000 truck trips per year (59.7%) on the county's roads. This puts immense pressure on municipal streets as they absorb the increased activity and weight, leaving Cuyahoga County residents responsible for paying county levies more frequently to maintain the roads they drive every day. The county and corresponding municipalities currently own most of what the drayage crosses, which, most importantly, are bridges. These bridges are expensive to maintain and repair due to the deterioration and fatigue in older steel structures. A load increase of this magnitude would require a replacement schedule for outdated parts to ensure they are working properly. I believe it would be beneficial to require a drayage routing and pavement/bridge impact study done by the Office of Environmental Analysis, with mitigation if the analysis supports it. With this study, Maple Heights can determine the specific effects this merger would have on their city.

Passenger Rail Concerns

Additionally, this merger could create some negative ramifications for passenger rail in Ohio. Union Pacific currently ranks last among all fixed major host railroads by the Amtrak Host Railroad Report application, saying it hasn't shown how additional freight trains will operate alongside existing ones. Without evidence showing how all these cars will work together, the benefits of the change are

unsubstantiated. More information is available at the following link:

<https://www.railpassengers.org/happening-now/news/releases/rail-passengers-urges-stb-to-summarily-deny-up-norfolk-southern-merger-application/>.

Without capital, growth cannot occur. This capital plan includes 32 projects, amounting to \$715 million, and none of the projects are in Northeast Ohio, let alone Cuyahoga County. This merger seeks to increase truck and rail traffic on the same physical plant and tracks that exist today. This process is inefficient. Heavier trains and trucks travel more often on unchanged infrastructure, creating a greater burden on the system and the residents who surround it. Change must occur to keep productivity and performance high. However, this merger will not be beneficial to the people of Northeast Ohio, and I strongly urge its rejection until some of these important issues are addressed.

I appreciate and thank you for the opportunity to comment on this merger and ask for full and fair consideration of the issues identified in this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Nickie J. Antonio", with a stylized flourish extending to the right.

Nickie J. Antonio
Ohio Senate Democratic Leader