



September 21, 2026

Docket No. FD 36873 (Union Pacific Railroad Company and Union Pacific Corporation — Control — Norfolk Southern Corporation and Norfolk Southern Railway Company)

Submitted by: City of Danville, Illinois

Re: Preliminary environmental consultation / scoping comments (deadline September 21, 2026)

To the Office of Environmental Analysis, Surface Transportation Board:

The City of Danville, Illinois submits the following preliminary comments in response to the Board's request for environmental scoping input on the proposed Union Pacific–Norfolk Southern control transaction, Docket No. FD 36873.

1. Increased train traffic through Danville. The City's understanding, based on information provided in connection with the Applicants' merger-related infrastructure plans, is that Norfolk Southern rail traffic through Danville will increase by at least two additional trains per day as a result of the proposed transaction. The City requests that the Environmental Impact Statement evaluate the effects of this increased traffic on grade-crossing delay, vehicle idling and associated air quality impacts, emergency-vehicle response times, and pedestrian and vehicular safety at affected crossings within Danville.

2. Tilton Yard infrastructure project. The City understands the Applicants' plans include converting approximately 9.3 miles of Rule 93/directional double track to centralized traffic control (CTC) at Tilton Yard, including installation of universal crossovers (identified as "#20") just east of the yard, at an estimated cost of \$10.2 million, with completion anticipated by the end of Year 2 following approval. The affected segment is described as extending from northern Tilton to the Indiana state line. The City requests that the EIS specifically evaluate the construction and operational impacts of this project, including any effects on nearby crossings, noise, and community access during and after construction.

3. Existing crossing conditions that increased traffic would compound. The City's crossings at Bowman Avenue, Voorhees Street, and Liberty Lane already experience significant vehicle delay and idling under current traffic conditions. These crossings are also the subject of the City's ongoing rail consolidation and

grade-crossing study, funded through an Illinois State Planning and Research (SPR) grant. The City requests that the EIS consider the cumulative impact of merger-related traffic increases at these specific crossings, in light of documented existing conditions.

4. Request for continued consultation. The City requests that it be kept informed of the scope and schedule of the environmental review as it proceeds, and welcomes the opportunity to provide additional information as the City's own rail consolidation study progresses.

Respectfully,

A handwritten signature in blue ink, reading "Tim A. Cowan". The signature is fluid and cursive, with the first name "Tim" and last name "Cowan" clearly legible.

Tim A. Cowan, PE
Deputy Director of Public Works
City of Danville