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St. Paul, MN 55155

September 21, 2026

VIA ELECTRONIC FILING

Ms. Danielle Gosselin
Director
Office of Environmental Analysis
Surface Transportation Board
Washington, DC 20423

Re: Preliminary EIS Consultation Comments – STB Docket No. FD 36873

Dear Ms. Gosselin,

The Minnesota Department of Transportation (MnDOT) appreciates the opportunity to provide preliminary comments to assist the Surface Transportation Board's Office of Environmental Analysis (OEA) in defining the scope of the Environmental Impact Statement (EIS) for Docket No. FD 36873 – the Union Pacific-Norfolk Southern merger application. MnDOT encourages OEA to conduct a thorough analysis of environmental impacts associated with the proposed transaction and to identify appropriate mitigation measures for any significant adverse impacts.

The preliminary consultation materials provided by OEA indicate two sites in Minnesota that would experience impacts exceeding OEA's thresholds for truck traffic and two rail line segments that would exceed hazardous materials thresholds. MnDOT offers the following comments regarding these facilities:

Twin Cities Intermodal Terminal – Request for Multimodal Traffic Study

The projected increase in truck traffic raises several transportation concerns. MnDOT requests that the EIS include a focused multimodal traffic impact study addressing:

- Potential bike/pedestrian conflicts along current and planned bike/pedestrian corridors in the area, including MnDOT's 2031 shared-use path project directly in front of the facility and Minneapolis Park & Recreation Board plans for the potential Grand Rounds Missing Link grade separation adjacent to the facility.
- Minnesota Trunk Highway (TH) 280 impacts including at the Kasota/Energy Park Drive interchange, which is near signal-warrant thresholds and may experience operational issues with higher truck volumes. A portion of this corridor is located within MnDOT's *Rethinking I-94* project area.

- The sufficiency of acceleration/deceleration lengths on TH 280 loop ramps for increased heavy commercial traffic volumes.
- The potential for increased truck traffic at area highway-rail grade crossings and the University of Minnesota Transitway crossing at Energy Park Drive.

This traffic analysis will help determine whether mitigation measures are needed to address safety, multimodal, and operational concerns.

St. Paul Auto Reload Facility – Neighborhood-Level Impacts

MnDOT requests analysis of neighborhood impacts related to increased truck volumes, including routing implications (Shepard Road vs. TH 5), localized safety considerations, highway-rail grade crossing impacts, and sensitivity to heavy commercial vehicle traffic on residential streets.

MnDOT also requests analysis of whether transaction-related traffic growth at the Twin Cities Intermodal and St. Paul Auto Reload facilities would increase train movements or yard switching activity affecting current or proposed passenger services. This should include potential switching-related effects on *Borealis* and *Empire Builder* operations in St. Paul, and effects on future Twin Cities passenger service and station planning.

Pokegama-East Minneapolis Hazardous Materials Segment

This segment utilizes BNSF trackage rights between Minneapolis and Superior, WI. Most of this corridor is not equipped with Positive Train Control (PTC), so OEA should evaluate whether any transaction-related traffic growth would involve poison- or toxic-by-inhalation hazardous materials in a manner that may trigger PTC requirements under federal law, and whether mitigation is warranted. Additionally, MnDOT requests an analysis of the impact of transaction-related traffic growth on MnDOT's plans for the Twin Cities-Duluth/Superior passenger rail corridor which is in the Federal Railroad Administration's Corridor ID program.

Albert Lea Subdivision Hazardous Materials Segment

MnDOT requests an analysis of transaction-related traffic growth on the potential Twin Cities-Kansas City passenger rail corridor as identified in the Minnesota State Rail Plan. The Albert Lea Subdivision is a potential route for this corridor.

MnDOT requests that the EIS evaluate all rail segments that experience transaction-related increases in hazardous materials to identify risks associated with highway-rail grade crossings, route physical characteristics, sensitive receptors, spills and releases, and local emergency response readiness for possible mitigation.

Additionally, MnDOT requests clarification of how OEA applies Section 4(f) requirements to non-rail transportation features affected by the proposed merger.

Finally, MnDOT notes that several federally recognized tribes in Minnesota were not included in the preliminary consultation list. MnDOT urges OEA to ensure that all tribes required to be consulted under Section 106 are fully included and engaged to support meaningful government-to-government consultation.

MnDOT appreciates the opportunity to provide these comments and looks forward to continued coordination with OEA throughout development of the EIS.

Ms. Danielle Gosselin
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Sincerely,

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Torey Hunkus
Director, Office of Freight and Commercial Vehicle Operations

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