



CITY OF CLEVELAND
Mayor Justin M. Bibb
**MAYOR'S OFFICE OF
SUSTAINABILITY**

September 21, 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

Dear Director Gosselin:

Thank you for the opportunity to provide preliminary comments regarding the environmental review of the proposed acquisition of Norfolk Southern by Union Pacific.

The City of Cleveland is a major freight rail center, with active rail corridors passing through and adjacent to residential neighborhoods, employment centers, industrial areas, and critical transportation infrastructure. Given Cleveland's position within the national freight rail network, the City has a strong interest in ensuring that the Surface Transportation Board's Environmental Impact Statement appropriately considers potential impacts associated with changes in rail operations that may result from the proposed transaction.

As the Office of Environmental Analysis develops the scope of its review, we respectfully ask that it consider potential impacts to Cleveland and surrounding communities, including the following:

- **Rail traffic and operations.** We encourage the EIS to identify projected changes in train frequency, train length, tonnage, routing, and operating patterns on rail segments within Cleveland and the surrounding area, including both potential increases and decreases associated with the transaction.
- **At-grade crossings and emergency response.** Changes in train frequency or length may affect roadway operations and the duration of blocked crossings. We ask that the review consider potential effects on motorists, pedestrians, and bicyclists, as well as access and response times for police, fire, and emergency medical services.
- **Air quality.** We encourage the EIS to consider potential changes in locomotive air quality and greenhouse gas emissions, idling, and activity at rail yards and other facilities, including potential localized effects on neighborhoods near heavily traveled rail corridors.
- **Noise and vibration.** The review should consider potential changes in noise and vibration associated with train traffic, switching activity, idling, or other operational changes, particularly in residential areas adjacent to rail infrastructure.
- **Hazardous materials and public safety.** We ask that the EIS consider whether the transaction may result in changes to the volume, type, or routing of hazardous materials transported through Cleveland and any associated implications for public safety, emergency preparedness, and response.
- **Rail yards and intermodal facilities.** To the extent activity is projected to change at facilities in the Cleveland area, we encourage consideration of potential effects related to rail operations,

truck traffic, air quality and greenhouse gas emissions, noise, lighting, and idling, as well as potential impacts on surrounding roadways, waterways and neighborhoods.

- **Capital improvements.** The Applicants have identified transaction-related capital improvements in Ohio. We respectfully request that the EIS identify any such improvements proposed within Cleveland or the surrounding area.
- **Community impacts.** We encourage the environmental review to consider impacts at the neighborhood level, particularly in areas where changes in rail operations could interact with existing transportation, air-quality, noise, or other environmental conditions.

The City also encourages OEA to continue providing local governments with detailed information regarding projected operational changes and proposed capital improvements as that information becomes available. Doing so will help affected communities better understand potential local impacts and participate meaningfully throughout the environmental review process.

Cleveland recognizes the important role freight rail plays in supporting the regional and national economy, including the movement of goods and the economic activity that depends on a reliable freight network. Given the scale of the proposed transaction, we believe a thorough review of potential community and environmental impacts will help ensure that the Board has a complete record as it considers the application.

We appreciate the Board's consideration of Cleveland's comments and its commitment to a comprehensive environmental review. We look forward to continuing to work constructively with the Board, the Applicants, and other stakeholders as the review moves forward.

Sincerely,



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