

September 21, 2026

Surface Transportation Board
395 E Street SW
Washington, DC 20423
Filed Electronically

RE: Docket No. FD 36873 | Scope of EIS

Dear Office of Environmental Analysis:

The City of Minneapolis appreciates the opportunity to provide preliminary comments regarding the scope of environmental review of the proposed Union Pacific-Norfolk Southern merger. The city is not taking a position on the proposed transaction, but we do submit the following comments and request that potential impacts be considered as the Office of Environmental Analysis develops the Environmental Impact Statement (EIS).

The Surface Transportation Board's Data Explorer shows a potential impact in Minneapolis that exceeds the Board's threshold for environmental analysis. There is a projected transaction-related increase in truck movements at the Twin Cities Intermodal Yard. The projected change would increase average daily truck movements by 270.2%, equal to an additional 127 trucks per day according to data retrieved today.

Heavy Trucks

The city is concerned about new impacts and the potential to exacerbate challenges that already exist nearby from idling or parked vehicles, emissions, congestion, obstruction, wear and tear on local infrastructure, the ability for trucks to use preferred routes, safety concerns for all modes including pedestrians, and access for emergency vehicles. We are concerned about new air quality and health impacts from the projected increase.

Rail Traffic

Data Explorer also shows a rail segment through the Twin Cities as experiencing transaction-related growth of one or more hazardous-material carloads per day. We request the EIS evaluate and mitigate transaction-related operational changes that could affect community health and safety. We request the environmental review consider potential changes in train length, weight and operation practices associated with the transaction and the potential for blockages in the Twin Cities.

Please see the attached documents regarding conditions near the Twin Cities Intermodal Yard.



Tim Sexton
Director of Public Works
City of Minneapolis

City of Minneapolis comments regarding scope of environmental review for potential Union Pacific-Norfolk Southern Merger

Existing Traffic Operations



The map shows areas of concern circled in purple.

The city is concerned about the projected increase in truck movements and the potential to exacerbate problematic conditions in and around the rail yard. While CPKC's Shoreham Yard is in northeast Minneapolis, its intermodal operations sit three miles south in the Prospect Park neighborhood, connecting directly to the Malcolm Ave SE corridor through off-site logistics networks. Because the Shoreham Yard (NE MPLS) lacks the footprint for long-term storage of empty containers, chassis, and support equipment, drivers must constantly cycle between the yard and external off-site facilities. These off-site facilities handle the essential maintenance, repair, and equipment staging that keep the yard fluid.

Two major players anchored this network near the Malcolm Transfer Station: CMC (Container Maintenance Company - formerly ITI Intermodal) and Illinois Transport. As vital nodes in the regional intermodal system, both facilities draw heavy, continuous truck traffic. This layout creates a constant operational loop. For example, a driver might pull a loaded container from the Shoreham yard, drop the freight at a local customer, and then haul the empty chassis to an off-site facility instead of returning to the yard. On the flip side, drivers often visit these secondary facilities (Malcolm Yard) to grab empty equipment before heading to Shoreham Yard to hook into a freshly arrived rail container. Because it serves this constant back-and-forth, University Avenue and Malcolm Avenue serve as the critical connective tissue linking the yard, regional highways, and off-site logistics facilities.

Malcolm Avenue SE / University Avenue SE

The most significant recurring operational concern is **truck queuing on Malcolm Avenue SE north of University Avenue SE**.

Container trucks arriving at CMC may have to wait in the parking lane before they can enter the facility. Trucks are reportedly processed one at a time, so operations slow down or equipment malfunctions occur, the line can extend toward University Avenue.

When the queue reaches University Avenue, trucks waiting to enter Malcolm Ave may not be able to make the turn and can remain stopped through several signal cycles. This can create congestion on both Malcolm and University Avenue and make it more difficult for other vehicles to move through the area.

Occasional reported impacts include (also see attached pictures from area residents):

- Trucks blocking or partially blocking driveways, crosswalks, and curbside areas (weekly);
- Disruptions to general traffic movement on Malcolm and University Avenues (daily);
- Truck idling near residential and commercial properties (weekly); Increased conflicts between heavy trucks, passenger vehicles, pedestrians, bicycles, and transit (daily); and
- Interference with the **E-Line bus stop at University Avenue and Malcolm Avenue** (more frequent spring and summer – at least twice a month).

Because these conditions are irregular and unpredictable, it can be challenging for City traffic-control personnel to respond after a queue has already formed.

The E-Line stop is of particular concern because buses have much less ability than passenger vehicles to maneuver around a line of tractor-trailers. If trucks occupy the bus-stop area, buses may be delayed and passengers may face less safe or less accessible conditions when boarding, exiting, or wading through the area.

4th Street SE Truck Traffic

A separate but related concern is the number of trucks using **4th Street SE between 25th Avenue SE and Malcolm Avenue SE**, which is not designated as Minneapolis Truck Route.

The alternating use of 4th Street by trucks creates additional conflicts between industrial freight movements and neighborhood traffic, pedestrians, and other roadway users.

It would be beneficial if the CMC and other facilities repeatedly advised its independent truck drivers **not to use 4th Street SE** when accessing its facility.

Noise, Air Pollution and Neighborhood Impacts

The effects of the truck activity extend beyond roadway congestion.

- Empty containers and chassis trucks can generate significant intermittent noise because empty equipment has less mass to dampen movement.
- Extended truck queues also result in idling vehicles adjacent to residences and businesses.

Projected Increase in Truck Traffic

The existing concerns should be considered in the context of projected growth in intermodal freight activity. Internal Union Pacific/Norfolk Southern projections (attached) show a 366.7% spike in yard-related truck traffic, which translates to roughly 165 more trucks per day. Additionally, the [interactive map](#) from the EIS forecasts a 270.2% increase in intermodal facility truck traffic. Adding this volume to an already strained local street network will worsen bottlenecks and increase safety risks where freight routes overlap with transit, pedestrians, and residential neighborhoods.

If additional truck activity follows the existing circulation pattern between Shoreham Yard and the Malcolm Avenue logistics facilities, the increase could result in:

- More frequent truck queues at CMC;
- Longer or more persistent queues on Malcolm Avenue;
- Increased potential for queues to extend onto University Avenue;
- Greater interference with the E-Line bus stop;
- Increased truck idling and associated noise & air pollution;
- More frequent obstruction of driveways, crosswalks, and curbside areas; and
- Increased truck activity on neighborhood streets such as 4th Street SE.

The projected increase therefore reinforces the need to address existing operational deficiencies before additional truck demand occurs. Measures that may be adequate under current conditions may not remain adequate as intermodal activity increases.

Considerations

Because many of the most disruptive conditions appear to originate from facility operations, mitigation should not rely solely on public-street traffic control.

The following measures should be considered:

1. **Constructing a new access point** to these facilities through a roadway crossing from SE Kasota Ave from the north, which is a short distance away from Hwy 280, and eliminating truck traffic from Malcolm Ave SE
2. **Facility-level queue management:** CMC should evaluate procedures to prevent trucks from forming extended public-street queues when the facility is unable to process vehicles promptly.
3. **Off-street staging:** Consider whether truck staging, appointment systems, or other operational measures could keep waiting trucks off Malcolm Avenue and University Avenue.
4. **Equipment reliability and contingency procedures:** Because equipment or operational failures reportedly contribute to significant queues, CMC should evaluate preventive maintenance, backup equipment, and procedures for periods of reduced processing capacity.
5. **Transit protection:** Measures should be implemented to prevent truck queues from blocking or materially interfering with the E-Line bus stop at Malcolm and University.
6. **Queue notification:** A mechanism for notifying City Traffic Control staff or affected parties when queues are expected to extend beyond the facility could allow earlier intervention.

Conclusion

The traffic concerns documented in this memorandum involve one main issue: **truck queuing and traffic operational/safety conflicts on Malcolm Avenue SE/University Avenue SE.**

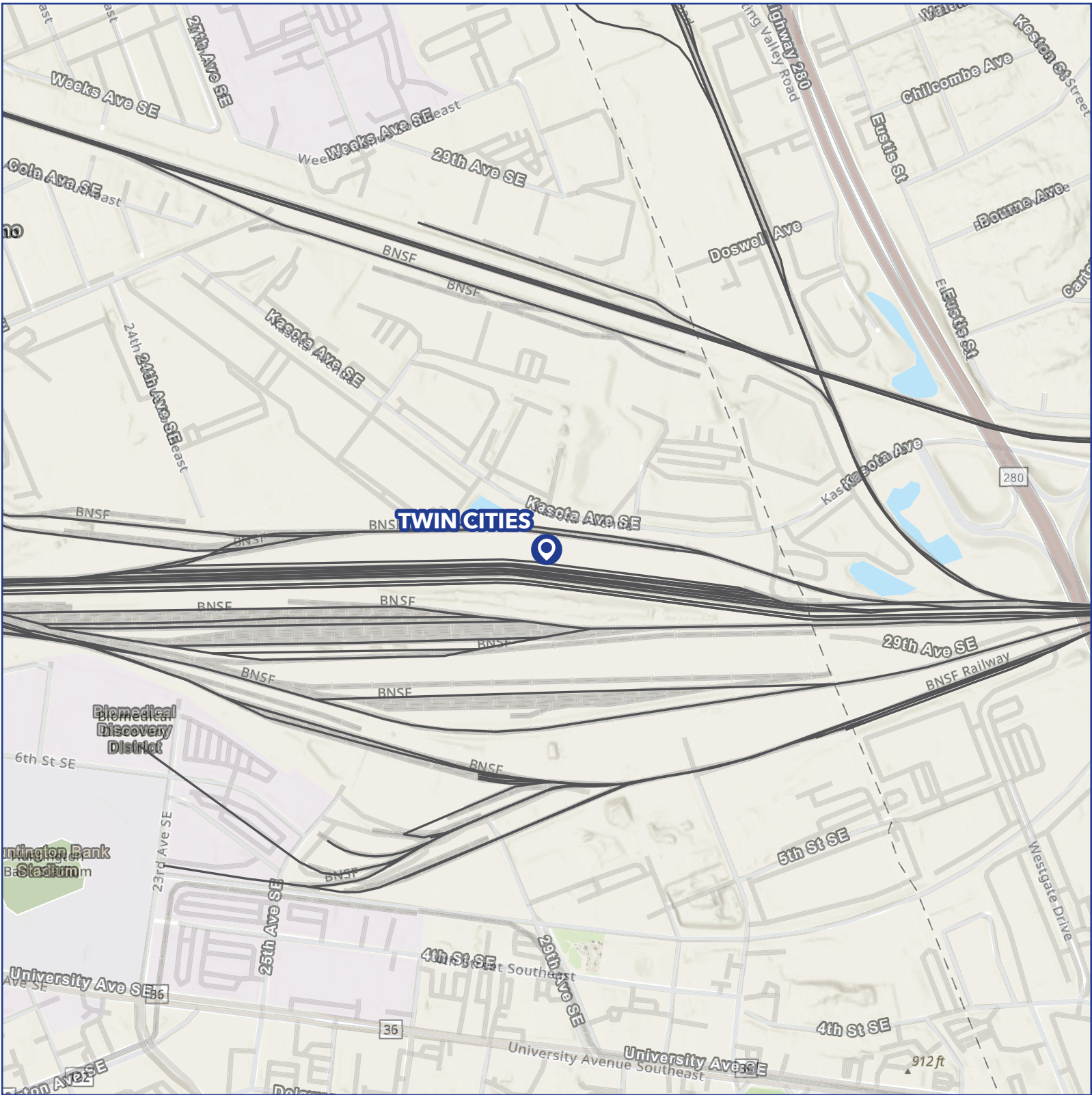
Existing conditions warrant attention independent of future growth. However, the projected truck traffic potential growth increases the importance of addressing these conditions proactively.

The anticipated increase could amplify existing deficiencies if the additional trucks use the same roadway and facility circulation patterns. Increased demand could result in more frequent or severe queues extending onto University Avenue, greater interference with the E-Line bus stop, additional driveway and crosswalk obstructions, increased truck idling and noise, and greater pressure on neighborhood streets.

The most effective strategy should therefore combine **facility-level truck queue management, off-street staging, protection of transit operations, and constructing a new access point.** Coordination with CMC and other industrial operators is especially important because facility operating conditions appear to be a significant contributor to the most disruptive truck queues.

Proactive measures should be considered before projected growth occurs rather than relying on reactive traffic control after queues and conflicts have developed. Without proactive partnership around truck traffic, future improvements to city infrastructures have the potential to make it more difficult for the additional truck volumes to navigate the area.

Addressing both current conditions and anticipated freight growth will provide a stronger basis for maintaining safe, efficient, and compatible transportation operations in the Prospect Park area.



Twin Cities Yard

525 Kasota Ave SE, Minneapolis, MN

Trucks Per Day

TPD

Transaction
Related Growth

Baseline

45

Year 5

210

Growth

165

366.7%



0

0.45



Miles

A4_INTERMODAL

OEA Map Series Info. Request No. 1



Intermodal Yards

