



513.563.0033

Sharonville Municipal Building
10900 Reading Road
Sharonville, Ohio 45241

September 21, 2026

Danielle Gosselin, Director
Office of Environmental Analysis
Surface Transportation Board (Docket # FD 36873)
395 E St SW
Washington, DC 20423

RE: Docket # FD 36873 Preliminary Consultation; Union Pacific Corporation and Union Pacific Railroad Company – Control – Norfolk Southern Corporation and Norfolk Southern Railway Company

Dear Ms. Gosselin,

The City of Sharonville, Ohio appreciates the opportunity to submit comments on environmental issues and/or concerns associated with the proposed Union Pacific and Norfolk Southern merger. Please note that the City of Sharonville, Ohio intends to separately submit comments to the overall docket and has filed a Notice of Intent to Participate as a Party of Record and asks that this letter be made part of the record in Finance Docket # FD 36873.

Sharonville is a city located 12 miles north of the City of Cincinnati and is home to Sharonville Yard, an intermodal facility that will see significant capacity expansion as a condition of the proposed merger. According to the Data Explorer mapping tool setup by the Surface Transportation Board, Sharonville Yard will see \$26.2 million of improvements to be completed in Year 2 which will include:

- 5,900 feet of additional track
- A new wheeled parking lot with 350 stalls
- Capacity improvements to increase capacity to 206,000 lifts per year
- An increase in the number of train cars carrying hazardous materials travelling through the yard
- A 185% increase in the number of intermodal transactions at the yard – a growth of 383 additional transactions per day

With these future developments and impacts in mind, the City of Sharonville suggests the environmental impact study (EIS) for the proposed merger include the following topics of analysis related to the improvements at Sharonville Yard:

1. **Increased Truck Exhaust Emissions:** 383 additional transactions per day. This would have a proportional increase of traffic in, out, and within the facility. At times, lines of trucks are observed idling waiting to drop or receive containers at the facility. The increase in truck traffic will add to truck-based emissions released in the vicinity of the Sharonville Intermodal Facility.
2. **Increased Train Exhaust Emissions:** The capacity increase at the Sharonville Intermodal Facility would result in an increase of container freight moving through the facility. This increase would result in more trains and/or longer trains which would result in increased emissions from diesel train locomotives.
3. **Increased vehicle Emissions from Vehicles Waiting at Crossings:** Activity at the Sharonville Intermodal Facility affects three nearby at-grade crossings to the north (Reading Road, Kemper Road, and Hauck Road). Activity in the facility often closes the Reading and Kemper Road crossings for multiple hours at a time. Increased freight volumes at the facility will only increase the number and duration of these closures. Each closure results in traffic delay and idling vehicles resulting in increased emissions.
4. **Increased Flood Risk Exposure:** Much of the Sharonville Intermodal Facility is located in the floodplain of Sharon Creek. The improvements would place more track, more railroad assets, and more freight in potential harm from flooding.
5. **Potential for Spills affecting Sharon Creek, Mill Creek, and the Regional Aquifer:** As discussed above, the Sharonville Intermodal Facility sits alongside the Sharon Creek and Mill Creek - very important surface waterways in the region and tributaries of the Ohio River. In some places, track in the facility sits only a few feet from the bank of Sharon Creek. Also, the entire facility sits on top of one of the largest and most important buried aquifers in the U.S. that provides drinking water for millions of residents in the region. Soils in the area suggest a high degree of transference between surface water and the aquifer. In addition to the container freight that makes up the intermodal transfers handled by the facility, many cars of liquid materials pass through the facility daily. With the close proximity to these important waterways and aquifer, the potential for spills to damage the water quality of these resources that are important to many communities in the region.
6. **Increased airborne dust from Yard operations:** Airborne dust in the vicinity of the Yard and dirt tracked out onto Sharon Road has been a periodic concern of surrounding businesses and neighbors.



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Again, we appreciate the opportunity to submit these comments to help guide the EIS and address local impacts of the proposed merger. If you have further questions regarding the comments, please contact Andy Meyer, Community Development Director at ameyer@cityofsharonville.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim Lukas".

Jim Lukas
Safety Service Director
City of Sharonville, Ohio