



Dr. Marshaun Warren, Superintendent
920 N. Illinois St. Belleville, IL 62220
P: 618-222-8200 F: 618-233-7586
mwarren@bths201.org

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Dear Ms. Webster:

Thank you for the opportunity to provide preliminary comments regarding the proposed acquisition and consolidation of Union Pacific Railroad Company and Norfolk Southern Railway Company in Surface Transportation Board **Docket No. FD 36873**.

As Superintendent of the Belleville Township High School District #201, I am concerned about the potential impacts of this transaction on our students, staff, families, school facilities, transportation operations, and the communities we serve. While we recognize the potential economic and transportation benefits of an expanded rail network, any significant increase in rail traffic and related infrastructure must be carefully evaluated for its potential impact on public safety and the operation of our schools. After consultation with the Board of Education, our primary concerns include the following:

Student and Public Safety at Railroad Crossings

An increase in the frequency, length, and/or duration of trains could result in more frequent blocked railroad crossings. This presents a significant concern for school buses, parents transporting students, staff, emergency responders, and other members of the community.

The Environmental Impact Statement should specifically identify railroad crossings located along or near school bus routes, school campuses, athletic facilities, and other locations where students regularly travel. The analysis should evaluate whether increased train traffic could create longer delays, increase the likelihood of vehicles attempting to circumvent blocked crossings, or otherwise create additional safety hazards.

School Bus Transportation and Routing

The School District relies on predictable transportation routes and schedules to safely transport students to and from school. Increased rail traffic and longer trains could create delays at crossings and negatively affect transportation schedules.

The EIS should evaluate the potential effects of increased rail traffic on school bus routes, including:

- The number and location of railroad crossings used by school buses;
- Average and peak crossing delays under current conditions;
- Potential increases in crossing closure times;
- Impacts on on-time arrival and dismissal schedules;
- Additional fuel, labor, and operational costs associated with delays; and
- Whether alternative bus routes would be necessary or feasible.

We also request that school districts be specifically consulted regarding any proposed changes that could affect established student transportation routes.

Emergency Response and Evacuation

Blocked railroad crossings can create serious challenges for police, fire, ambulance, and other emergency services. Increased train frequency and longer trains could further restrict access to portions of the community.

The EIS should evaluate whether the proposed transaction could increase emergency response times to school facilities and residential areas. It should also examine whether existing emergency response and evacuation plans remain adequate under projected rail traffic conditions.

Traffic Congestion Near Schools

Increased rail activity may also affect vehicular traffic on roads surrounding schools, particularly where railroad crossings are located near school campuses or along major student transportation routes.

The EIS should evaluate potential increases in traffic congestion, vehicle queuing, and safety risks resulting from longer or more frequent train movements. Particular attention should be given to conditions during school arrival and dismissal periods, when pedestrian and vehicle activity is already at its highest.

Noise and Air Quality

We are also concerned about the potential effects of increased train traffic, locomotive idling, switching operations, and rail yard activity on noise and air quality near schools and other sensitive locations.

Students and school employees spend significant portions of their day on school campuses. The EIS should evaluate whether projected changes in rail operations could result in increased noise, diesel emissions, vibration, or other environmental impacts at or near schools.

This analysis should include consideration of schools as sensitive receptors and should not be limited solely to residential or commercial properties.

Proposed Rail Infrastructure and Construction

Any proposed expansion, construction, or modification of rail lines, yards, intermodal facilities, or related infrastructure should be evaluated for impacts on nearby school properties and operations.

The District is particularly concerned about construction-related traffic, noise, dust, changes to roadway access, utility impacts, and potential disruptions to school operations. If construction occurs near a school facility, appropriate mitigation measures should be established in advance to protect students and staff.

Comprehensive Analysis of Cumulative Impacts

We request that the EIS consider the cumulative impacts of increased train frequency, longer trains, increased rail yard activity, additional truck traffic, and infrastructure expansion rather than evaluating each component in isolation.

The combined effects may be particularly significant for communities where railroad crossings, schools, major roadways, and emergency response routes are concentrated in the same areas.

Mitigation and Continued Consultation

If the Transaction is approved, we believe appropriate mitigation measures should be required where impacts to schools and student transportation are identified. These measures could include improvements to railroad crossings, enhanced traffic controls, coordination with local emergency responders, modifications to school bus routes, advance notification of significant construction or operational changes, and other measures necessary to protect student and public safety.

We also request continued consultation with Belleville Township High School District 201 as the Environmental Impact Statement is developed, particularly if the Board identifies rail segments, crossings, yards, or infrastructure projects that may affect school facilities or student transportation routes.

The safety of our students and staff must remain a priority when evaluating the potential impacts of this proposed transaction. We respectfully request that the Surface Transportation Board and its Office of Environmental Analysis fully consider the concerns outlined above and specifically assess the potential effects of increased rail activity on schools, school transportation, emergency access, and community safety.

Thank you for the opportunity to participate in the preliminary environmental consultation process. Please include these comments in the administrative record for **Docket No. FD 36873**. We would welcome the opportunity to provide additional information regarding school facilities, transportation routes, and other District resources that may be relevant to the environmental review.

Sincerely,

Dr. Marshaun Warren
Superintendent