



City of Portland

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September 18, 2026

VIA ELECTRONIC FILING (ENVIRONMENTAL COMMENTS)

Elizabeth Webster
Surface Transportation Board (Docket No. FD 36873)
Office of Environmental Analysis
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*; Comments from the City of Portland, Oregon on Preliminary Consultation for Preparation of an Environmental Impact Statement

Dear Ms. Webster:

The City of Portland, Oregon (the “City”) submits these comments in response to the preliminary consultation materials that the Surface Transportation Board’s (Board) Office of Environmental Analysis (OEA) distributed on August 19, 2026, concerning the proposed control transaction between Union Pacific (UP) and Norfolk Southern (NS) (collectively, the “Applicants”). The city offers these comments to assist OEA in defining the environmental impacts that the Environmental Impact Statement (EIS) should analyze, and to ensure that the impacts in Portland’s Central Eastside rail corridor are examined at the level of detail they require rather than averaged into a system-wide or national assessment.

The Portland Bureau of Transportation (PBOT) owns and maintains the public street network that crosses UP’s main line through the Central Eastside, where fifteen at-grade crossings between UP’s Albina Yard to the north and Brooklyn Yard to the south are already blocked by long freight trains for hours at a time on a near-daily basis. OEA’s preliminary screening has already identified the Brooklyn Intermodal facility, in the heart of this corridor, as exceeding the Board’s environmental analysis thresholds. The Applicants’ data project that the Transaction will add approximately 94 drayage trucks per day at that facility, a 21.7 percent increase, which exceeds the Board’s threshold of 50 additional vehicles per day at 49 C.F.R. § 1105.7(e)(5)(i)(C). Brooklyn Yard is therefore within the scope of the EIS, and the City’s comments below address the effects of that increased activity that warrant analysis.

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Because OEA has identified Brooklyn Yard as an affected facility, the city respectfully requests that OEA analyze the full range of direct, indirect, and cumulative effects of the increased activity at that facility, and not only the drayage-truck impacts that crossed the numeric screen. The increased intermodal activity at Brooklyn Yard is carried out through additional and longer train movements, switching, and staging on the main line at and approaching the yard, and those movements are the direct cause of the crossing-blockage, safety, and emergency-access effects described below. Under the National Environmental Policy Act (NEPA), those are direct and indirect effects of the increased facility activity and fall within the scope of the EIS.

The City asks that OEA analyze the effects below at the level of the specific crossings and corridor segments where they occur, **extending the analysis the full length of the UP main line and the at-grade crossings between Albina Yard and Brooklyn Yard through the Central Eastside, each identified by name**, and not confine the facility analysis to the Brooklyn Yard footprint or aggregate these crossings into a system-wide assessment that would obscure them:

1. **Grade-crossing blockage and delay.** Analyze the projected frequency and duration of crossing blockages produced by the increased Brooklyn Yard activity at the fifteen Central Eastside crossings, and specifically at the SE 8th, SE 11th, and SE 12th Avenue crossings and the crossings from SE Stark Street to SE Clay Street. Because delay on a saturated corridor compounds rather than rising in a straight line, examine the non-linear relationship between added operations and blockage time rather than assuming a strictly proportional increase.
2. **Fiscal and economic impacts.** Analyze and quantify the economic and fiscal effects of increased crossing blockages, including delay costs to freight carriers, commercial vehicles, and workers held at the crossings; disruption to deliveries, customer access, and employee access for Central Eastside businesses; the effect of a more frequently severed corridor on economic activity and investment in the district. The City requests that OEA develop a delay-cost estimate for the corridor as part of the analysis, and, consistent with the requirement to consider economic and social effects where they are interrelated with the physical effects of the action, that these impacts be analyzed together with the traffic, safety, and access effects from which they arise.
3. **Emergency response access.** Examine the effect of increased blockages on emergency response, including delay to fire and medical units cut off from the neighborhoods north of the main line and forced onto out-of-direction detours. SE 8th, SE 11th, and SE 12th Avenues are designated Major Emergency Response Streets in the City's Transportation System Plan, and the nearest Portland Fire & Rescue station sits immediately south of the main line near SE 12th Avenue and also serves communities north of the main line.
4. **Drayage-truck routing and volumes.** Examine the routes, volumes, and street and intersection impacts of the approximately 94 additional drayage trucks per day the Transaction is projected to add at Brooklyn Yard, a 21.7 percent increase, on the surrounding industrial and residential district and its crossings.
5. **Transit and passenger-rail reliability.** Examine effects on transit and passenger operations that share or cross the corridor, including TriMet's FX bus rapid transit (BRT) crossing at SE 8th Avenue, Line 70 bus and Orange Line light rail service, and Amtrak Cascades and Coast Starlight on the shared main line, along with the mobility, ridership, and mode-shift consequences of degraded reliability in a district the City is working to serve with transit and active transportation.

6. **Pedestrian, cyclist, and motorist safety.** Analyze the safety effects of increased train frequency and length at these closely spaced, multi-track crossings, informed by the documented record of crashes and fatalities in the corridor and consistent with the City's Vision Zero commitments. Examine the behaviors that chronic blockage induces, including pedestrians and cyclists crossing between or in front of stopped rail cars, and the public's learned distrust of warning gates that remain down long after a train has cleared.
7. **Corridor-wide operations and the Albina chokepoint.** Analyze operational effects along the full corridor, not only at the crossings in isolation, including the pair of sharp curves near the former Louis Dreyfus Company grain terminal that slows southbound trains to roughly 6 miles per hour approximately two miles north of Brooklyn Yard, producing a single continuous chokepoint across inner Portland of which the Central Eastside crossings are the most acute point.
8. **Noise, vibration, and horn impacts.** Examine noise, vibration, horn, and idling impacts on residences, businesses, hospitals, and schools adjacent to the main line, including effects on the existing quiet zone at SE 8th, SE 11th, and SE 12th Avenue crossings and along the main line from SE Clay Street to SE Stark Street.
9. **Local air quality and emissions.** Analyze diesel emissions and local air quality effects from increased train operations, idling, and switching at Brooklyn Yard, together with the additional drayage-truck traffic that the increased intermodal activity will place on Central Eastside streets.
10. **Hazardous materials.** Analyze the routing, frequency, and potential consequences of hazardous-materials movements through this dense urban district, informed by the April 2024 UP derailment near the Steel Bridge that required a Portland Fire & Rescue hazardous-materials response and disrupted light rail and multiple bus routes across the bridge.
11. **Cumulative effects.** Analyze cumulative and growth-inducing effects on the Central Eastside and the residential neighborhoods adjacent to the main line and Brooklyn Yard, and the distribution of the corridor's burdens on the affected communities, consistent with OEA's obligation under NEPA to consider direct, indirect, and cumulative impacts.

The City will be separately submitting Comments and Request for Conditions in the transportation-merits portion of this proceeding that addresses many of these same impacts and to request corresponding mitigation. The City raises these matters in both the environmental and merits records so that the two reinforce each other and requests that OEA's analysis inform the environmental mitigation the Board may impose in its final decision on the Transaction.

The City appreciates OEA's consideration, welcomes a site visit by OEA staff to observe corridor conditions firsthand, and looks forward to participating in the formal public scoping process following OEA's Notice of Intent (NOI) to prepare the EIS. Please do not hesitate to contact the city with any questions.

Sincerely,



Millicent Williams
Deputy City Administrator
Public Works Service Area