



CITY OF BATTLE CREEK

OFFICE OF THE CITY MANAGER

September 22, 2026

Elizabeth Webster
Surface Transportation Board (Docket No. FD 36873/)
395 E. Street SW
Washington, DC 20423

RE: Union Pacific Acquisition of Norfolk Southern

Dear Surface Transportation Board,

Thank you for the opportunity for the City of Battle Creek, Michigan ("Battle Creek") to provide comments for the upcoming evaluation of the proposed acquisition of Norfolk Southern Corporation by the Union Pacific Corporation. Based on your notice and the interactive map on the Board's project webpage, we understand that rail segments running through Battle Creek could experience operational changes, specifically a projected increase of 131% in millions of annual gross ton miles (mGTMs).

Attached as **Exhibit A** is a map showing areas in the City of Battle Creek that are wetlands, National Historic Areas, and residential neighborhoods predominantly occupied by low to moderate income households. Exhibit A also shows areas with moderate or high biorarity probability – areas with known occurrences of rare species or high-quality natural communities. Biorarity is assessed based on information provided by the Michigan Natural Features Inventory (MNFI) database.

In reviewing the rail segments projected to be affected, City staff have identified multiple grade crossings over City streets and the Kalamazoo River. The Norfolk Southern line currently converges with the CN line, although plans are being developed at this time by the Michigan Department of Transportation Office of Rail to separate the lines. An email discussing those plans is attached as **Exhibit B**.

Without knowing what cargo will be transported and in what quantities, it is difficult to assess or predict the environmental impact of any increase in mGTMs. However, as previously noted, the affected rail segments run through residential neighborhoods as well as in proximity to the Kalamazoo River. All of those could be affected by the discharge or release of hazardous materials that may be carried on the affected rail segments.

Finally, Battle Creek has had long-standing issues with stormwater drainage that crosses rail lines. In the 1980s, Conrail blocked 2 of the 3 large diameter storm sewer lines that allowed stormwater to flow to the Kalamazoo River on a "temporary" basis due to the pipes poor condition. This has since caused backups of stormwater in the area, which has yet to be resolved. Attached here as **Exhibit C** is a drainage study that was conducted, and **Exhibit D** contains the minutes from a meeting held recently discussing those issues.

Thank you for consideration of these issues. We hope that it assists you in determining the scope of the environmental impact study on the acquisition of Norfolk Southern by Union Pacific.

Sincerely,

Amanda Zimmerlin
City Manager