

City of Springfield Comments on the Environmental Impact Statement for Union Pacific acquisition of Norfolk Southern Railway

The City of Springfield appreciates the opportunity to comment on the Environmental Impact Statement (EIS) for the proposed Union Pacific Railroad Transaction. The City recognizes the important role freight rail plays in regional and national commerce. However, the proposed increase in train traffic and train length through Springfield could create significant impacts to public safety, emergency response, traffic circulation, nearby neighborhoods, and the overall quality of life of our residents.

The EIS should thoroughly evaluate both the direct and cumulative effects of the anticipated increase in rail operations through Springfield. This analysis should not be limited to the number of additional trains. It should also consider increases in the number of railcars per train, total train length, the frequency and duration of blocked crossings, train speed, operating times, locomotive idling, and the types and quantities of hazardous materials transported through the community.

Hazardous-material risks

The City is particularly concerned about an increase in railcars carrying hazardous materials through populated areas. A derailment, collision, leak, or fire involving hazardous materials could have serious consequences for residents, businesses, waterways, public infrastructure, and the environment. Longer trains may also complicate emergency access, evacuation, incident stabilization, and the ability of responders to quickly identify and reach the affected railcars.

The EIS should identify the hazardous-material commodities reasonably expected to be transported through Springfield and evaluate the potential consequences of credible derailment, spill, fire, and release scenarios. The analysis should address risks to schools, residential neighborhoods, employment areas, environmentally sensitive lands, waterways, drinking-water resources, and other vulnerable locations. It should also evaluate whether increased train length or frequency would affect derailment risk, emergency-response requirements, and the severity of a potential incident.

Blocked crossings and emergency response

Increased train frequency and longer trains will likely result in more frequent and longer blockages at public crossings. These blockages can delay police, fire, ambulance, and other emergency services; disrupt school buses and public transportation; increase neighborhood traffic; and delay residents traveling to work, school, medical appointments, and other destinations.

The EIS should evaluate each affected public crossing in Springfield and disclose:

- Existing and projected daily train volumes;
- Existing and projected train lengths;
- The expected frequency and duration of crossing blockages;

- The likelihood of multiple crossings being blocked simultaneously;
- Effects on emergency-response routes and response times;
- Traffic queuing, delay, and diversion onto local streets;
- Effects on people walking, bicycling, or using mobility devices; and
- Cumulative impacts when rail activity is combined with future population, employment, and traffic growth.

Average delay alone would not adequately describe these impacts. The analysis should include peak and worst-case blockage durations, including stopped or slow-moving trains, and should evaluate scenarios in which a train simultaneously blocks several crossings.

Noise, vibration, air quality, and community impacts

Additional train movements may increase locomotive noise, horn noise, vibration, diesel emissions, and nighttime disturbance. These effects may be especially significant for residences, schools, parks, health-care facilities, and other sensitive uses near the rail corridor.

The EIS should evaluate daytime and nighttime impacts separately and should account for locomotive idling, acceleration, braking, switching operations, and the cumulative effects of repeated train events. The analysis should also identify neighborhoods that may experience disproportionate impacts, including low-income communities and other historically underserved populations.

Requested mitigation

The City requests that the EIS include enforceable mitigation measures proportionate to the impacts created by the project. At a minimum, the railroad and lead agency should evaluate the following measures:

1. **Crossing-blockage management:** Establish operating and dispatching practices that minimize both the frequency and duration of blocked crossings. Trains should not be staged, parked, or routinely stopped where they block public streets, and crew changes should occur at locations that do not obstruct crossings.
2. **Emergency access:** Maintain reliable emergency-response routes and avoid simultaneously blocking crossings needed by police, fire, and ambulance services. The railroad should coordinate operating plans with local emergency responders and provide a continuously staffed emergency contact capable of addressing stopped trains and blocked crossings.
3. **Train scheduling:** To the extent operationally feasible, schedule additional trains outside the City's highest traffic periods and avoid unnecessary nighttime operations through residential areas.
4. **Train length and operations:** Evaluate reasonable limits on train length through the community or other operational measures that reduce the number of crossings blocked at one time. The railroad should demonstrate that its siding, switching, and dispatching practices can accommodate longer trains without increasing prolonged crossing blockages.

5. **Crossing improvements:** Fund improvements at affected crossings, including warning-system upgrades, roadway and pedestrian improvements, lighting, signing, pavement rehabilitation, and other safety measures warranted by increased rail activity.
6. **Grade separation:** Participate financially in the planning, design, and construction of grade-separated crossings where increased rail operations would create substantial traffic, safety, or emergency-response impacts. The project should not shift the cost of mitigating railroad-generated impacts entirely to the City or its residents.
7. **Noise mitigation:** Use quieter and lower-emission locomotives where feasible, minimize idling, maintain track and equipment to reduce wheel and rail noise, and evaluate noise barriers or other measures near sensitive locations. Where appropriate, the railroad should help fund the safety improvements and technical work necessary to establish or preserve federally compliant quiet zones. The City recognizes that locomotive-horn requirements are federally regulated and is not requesting actions inconsistent with federal safety requirements.
8. **Hazardous-material safety:** Use routing, operating, inspection, and speed-management practices that reduce hazardous-material risks through populated areas. The railroad should provide timely commodity-flow information to emergency-response agencies to the extent permitted by applicable security requirements.
9. **Emergency preparedness:** Fund and participate in recurring training and exercises with local responders. This support should include specialized hazardous-material training, incident-command coordination, evacuation planning, equipment needs, access planning, and familiarization with railroad equipment and emergency procedures.
10. **Detection and inspection:** Install and maintain appropriate wayside defect-detection equipment and conduct inspections at intervals sufficient to identify overheated bearings, dragging equipment, wheel defects, and other conditions that could contribute to a derailment.
11. **Spill response and environmental protection:** Maintain adequate equipment, trained personnel, contractors, and response plans for a hazardous-material release. Plans should specifically address protection of waterways, stormwater systems, sensitive habitat, and public infrastructure in Springfield.
12. **Monitoring and reporting:** Establish baseline conditions before operations increase and provide ongoing public reporting regarding train frequency, train length, crossing-blockage duration, hazardous-material incidents, derailments, noise complaints, and air-quality impacts. The mitigation program should include measurable performance standards and corrective actions when those standards are not met.
13. **Community coordination:** Designate a local railroad liaison and maintain a clear, accessible process for the City and the public to report blocked crossings, idling, noise, safety hazards, and other operational concerns.

The EIS should identify who will implement and fund each mitigation measure, when implementation will occur, how effectiveness will be measured, and what corrective action will be required if a measure does not perform as intended. General commitments to future coordination are not an adequate substitute for specific, enforceable mitigation.

The City requests continued consultation as the environmental review proceeds, including direct coordination with City engineering, transportation, emergency-response, environmental-services,

and public-works staff. The City also requests project-specific information regarding projected train frequency, maximum and typical train lengths, operating schedules, hazardous-material movements, crossing-blockage estimates, and anticipated changes to switching or idling activities within Springfield.

The City supports a freight-rail system that operates safely and efficiently. That objective must be balanced with the need to protect Springfield residents, maintain emergency access, preserve the function of the City's transportation system, and reduce risks to public health and the environment. The City respectfully requests that these concerns be fully addressed in the EIS and that the final decision include enforceable mitigation measures to avoid, minimize, and compensate for project-related impacts.

Sincerely,

Stan Petroff
City Engineer
City of Springfield, Oregon