



Office of the City Engineer

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September 24, 2026

Office of Environmental Analysis
Surface Transportation Board (Docket No. FD 36873)
395 E Street SW
Washington, DC 20423

Re: Docket No. FD 36873, Union Pacific Corporation and Union Pacific Company – Control
– Norfolk Southern Corporation and Norfolk Southern Railway Company; Preliminary
Consultation

Dear Office of Environmental Analysis:

City of Lathrop Department of Public Works has reviewed the above-referenced
Preliminary Consultation Letter, and had the following comments:

Lathrop Intermodal was identified as an intermodal/auto ramp facility that exceeds the Board's thresholds for environmental analysis. San Joaquin County (County) recently partnered with the City of Lathrop (City) and other local agencies to study the Roth Road corridor that connects this facility to Interstate 5. This study documented significant delays that currently occur along this important County and City arterial roadway created by two at-grade Union Pacific Railroad Company (UPRR) crossings. These crossings include the Oakland subdivision line, a location within the City also identified as exceeding the threshold for analysis. As the metrics supplied for this review estimate a 77.4% transaction growth over the next five years at Lathrop Intermodal, the City is extremely concerned about increased impacts and delays to this important roadway. The City is requesting UPRR further analyze and document impacts resulting from this anticipated growth and for UPRR to work with the County and City to identify mitigations they can make to address these concerns, most importantly the increased delays to traffic on Roth Road at UPRR's at-grade crossings.

We look forward to collaborating with UPRR and appreciate the Office of Environmental Analysis for considering our comments. If I can be of further assistance, please let me know. I can be reached at by email at btaylor@ci.lathrop.ca.us or by phone (209) 941-7438.

Thank you,

Brad Taylor
Public Works Director/City Engineer