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## Preliminary Comments of the City of Ontario Planning Department

Surface Transportation Board Docket No. FD 36873

### VIA ELECTRONIC FILING

September 26, 2026

Elizabeth Webster  
Surface Transportation Board  
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; Preliminary Consultation

Dear Ms. Webster:

The Ontario Planning Department respectfully submits these preliminary comments on behalf of the City of Ontario, California, in response to the Surface Transportation Board Office of Environmental Analysis request for information concerning environmental issues, affected resources, and other concerns associated with the proposed transaction. The Department's responsibility is to ensure a sustainable quality of life where citizens can work, live and play in a safe and healthy environment. The City of Ontario's governing document is The Ontario Plan (TOP), the City's general plan. TOP sets forth the community's vision of "adding value to prosperity as well as to people, making Ontario truly a premier community of choice—a Balanced Community." TOP is our guiding document and is available on our website: <https://www.ontarioca.gov/government/community-development/planning/ontario-plan>.

These preliminary comments request that the Environmental Impact Statement include a detailed, Ontario-specific evaluation of air quality, impacts on sensitive uses, greenhouse gas emissions, noise and vibration, grade-crossing safety, hazardous-material transportation, and the measures needed to avoid or reduce adverse impacts on our community, consistent with the California Environmental Quality Act (CEQA). If the transaction is approved, any necessary mitigation should be specific, funded, measurable, enforceable, and subject to continuing review.

## Ontario Rail Operations Identified by the Applicants

The applicants' updated master segment tables identify the 22.7-mile Union Pacific Alhambra Subdivision segment between North Pomona and West Colton, which passes through Ontario, as exceeding the Board's threshold for environmental review. The applicants project 31.33 trains per day at baseline, 32.88 trains per day in Year 5 without the transaction, and 36.93 trains per day in Year 5 with the transaction. The transaction-specific increase is 4.05 trains per day, separate from 1.55 trains per day of projected organic growth.

For the same segment, the applicants project 31,260 annual hazardous-material carloads in Year 5 without the transaction and 35,537 annual hazardous-material carloads with the transaction, a transaction-specific increase of 4,277 carloads per year. These figures are applicant projections and should be independently examined during the environmental review; they are not final Board findings.

The applicants' roadway-crossing table lists five public at-grade crossings in Ontario on these segments:

| Crossing                 | USDOT Crossing Number |
|--------------------------|-----------------------|
| South San Antonio Avenue | 746939G               |
| Vine Avenue              | 746940B               |
| Sultana Avenue           | 748350L               |
| Campus Avenue            | 746944D               |
| South Bon View Avenue    | 746948F               |

## Issues and Concerns Requiring Analysis

**1. Air quality.** Currently, the Southern California Air Basin (SoCAB) is designated nonattainment for O<sub>3</sub> and PM<sub>2.5</sub> under the California and National AAQS,<sup>12</sup> for NO<sub>2</sub> along State Route 60 under the California AAQS,<sup>13</sup> and for PM<sub>10</sub> under the California AAQS. Because TOP 2050 involves long-term growth associated with buildout of the City, cumulative emissions generated by individual development projects would exceed the South Coast AQMD regional and localized thresholds. Given the proposed increase in rail service, the City requests a comprehensive air quality analysis that accounts for regional air quality and greenhouse gas impacts and addresses localized impacts on neighborhoods near the rail line that may be affected by increased rail service.

The localized impact analysis should include a CO hot-spot analysis and an assessment of toxic air contaminants, with an associated health risk assessment for areas along the rail line. It should also address compliance with the SB 1000 process because the rail line extends through Ontario census tracts and neighborhoods identified as environmental justice (EJ) communities in the 75th to 100th percentiles of CalEnviroScreen (CES).

**2. Noise and Vibration.** A comprehensive noise and vibration study should be prepared. Additional train movements will increase noise and vibration from trains traveling on the rail line, locomotive engines, and stopped trains, raising ongoing ambient noise levels in the area. The study should also evaluate the frequency of additional high-decibel noise from train horns at all at-grade crossings and the potential for additional train movements during late-evening and early-morning periods.

- 3. Traffic.** The analysis should account for train length, speed, time of day, crossing-occupancy duration, stopped or slow-moving trains, simultaneous blockage of multiple crossings, roadway queues, available grade-separated routes, and actual detour travel time. Peak-period and emergency scenarios are more informative for public safety than a systemwide daily average.
- 4. Grade-crossing collision and traffic risk.** Additional train movements may increase the frequency with which motorists, pedestrians, and bicyclists encounter active crossings. The EIS should examine collision history, warning-device performance, sight distance, pedestrian conditions, vehicle storage and queuing, nearby intersections, roadway geometry, driver behavior during extended delays, and the possibility that queues could interfere with emergency vehicles or adjacent intersections. The analysis should identify improvements needed at each Ontario crossing rather than treating the corridor as a single undifferentiated segment.
- 5. Hazardous-material incident preparedness.** A carload total does not by itself define local risk. The EIS should evaluate the types and quantities of hazardous materials expected to move through Ontario, routing and train-makeup assumptions, incident probability, credible release and fire scenarios, sensitive receptors, plume or runoff consequences, evacuation and shelter-in-place requirements, traffic-control needs, and the duration and staffing demands of a sustained response. Information subject to security restrictions should be provided through secure channels to authorized City responders and planners. Please note, a high-pressure gas line runs just north of the rail line.
- 6. Cumulative and disproportionate effects.** Ontario's general plan, The Ontario Plan, analyzes city growth through 2050. The EIS should evaluate the transaction together with these existing and reasonably foreseeable future conditions. It should identify the impacts of additional rail service in conjunction with the City's anticipated growth and on neighborhoods identified as environmental justice (EJ) communities in the 75th to 100th percentiles of CalEnviroScreen (CES), which may experience a disproportionate share of crossing delays, safety risks, noise, emissions, or emergency-management burdens.

## **Requested Studies and Mitigation**

The City of Ontario respectfully requests that the Office of Environmental Analysis include the following measures within the scope of review and, where supported by the record, as conditions of any approval:

- Air Quality Analysis encompassing both regional and localized mitigation
- Greenhouse Gas Assessment and associated rail electrification strategy
- CO-Hot Spot and Health Risk Assessments
- Analysis of potential impacts to environmental justice (EJ) communities
- Noise and vibration analysis
- Traffic study, travel-time modeling, and LOS analysis
- A commodity-specific hazardous-material risk and consequence analysis and an associated emergency-response analysis
- Evaluation and funding of appropriate physical or operational improvements, including grade separation, upgraded warning devices, roadway queue detection, traffic-signal coordination, crossing cameras or occupancy detection, anti-trespass measures, signage, and real-time blockage information for public-safety dispatch.

- Baseline and post-implementation monitoring of actual train volumes, train lengths, crossing-occupancy times, collision and near-miss indicators, emergency-response impacts, and hazardous-material traffic, with reporting requirements and a process for supplemental mitigation when actual effects exceed projections.
- A clear allocation of costs, schedules, responsibilities, performance standards, and enforcement mechanisms for each required mitigation measure.

## Conclusion

The City of Ontario is an integral part of the goods movement corridor and is committed to providing an optimal quality of life for our community. Achieving this goal requires comprehensive local analysis and tangible mitigation measures. A collaborative community outreach and information program addressing the issues and measures to reduce impacts is essential. Through such a program, the City requests that OEA include the issues, studies, and mitigation measures described above in the EIS and ensure that any adopted mitigation remains effective as actual operations develop.

The City of Ontario Planning Department appreciates the opportunity to participate in preliminary consultation and is available to provide local information or coordinate with OEA as the environmental review proceeds.

Respectfully submitted,

**Kimberly Ruddins**

Assistant Planning Director

City of Ontario, California

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## References

1. [Surface Transportation Board Office of Environmental Analysis, Preliminary Consultation Letter, August 19, 2026](#)
2. [Applicants, Updated Master Segment Tables for Errata Filing, July 27, 2026, Segment 10692](#)
3. [Applicants, Response to OEA Request 3, Roadway and At Grade Crossings, April 30, 2026, Segment 10692](#)
4. [Surface Transportation Board, UP NS Environmental Impact Statement Project Website](#)