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TOWN OF TRUCKEE

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Paul Bancroft, Neighborhood Services & Sustainability Director

October 30, 2026

RE: Docket No. FD 36873 – Comment Letter

Dear Office of Environmental Analysis:

The Town of Truckee appreciates the opportunity to provide comments regarding the environmental review of the proposed Union Pacific acquisition of Norfolk Southern. The Town is not taking a position on the proposed transaction. Rather, we are providing information about existing local conditions and requesting that potential impacts to our residents, community, and environment be adequately considered and mitigated as the Office of Environmental Analysis develops the Environmental Impact Statement (EIS).

The Town of Truckee is located along the Roseville Subdivision section of Union Pacific Railroad, just east of the Sierra Nevada crest. The railroad is a defining feature of Truckee's local history and character, bisecting the town from east to west and running through the middle of Truckee's historic downtown. As such, Union Pacific (UPRR) owns a considerable portion of land paralleling the railroad tracks in our historic downtown. The Town of Truckee maintains a collaborative relationship with UPRR; in recent years the Town has purchased easements from UPRR for parking and streetscape improvements; has worked closely with UPRR to plan for improvements to a critical at-grade crossing in the middle of our downtown; has installed a below-grade pedestrian crossing along State Route 89; and has worked with UPRR to plan the redevelopment of the historic Truckee Railyard district.

According to The Surface Transportation Board's Data Explorer tool, the Roseville Subdivision segment exceeds the Board's threshold for air quality and noise analysis. According to the Data Explorer, as a result of the transaction the 135.2-mile Roseville-to-Sparks segment is projected to experience a freight volume growth of 1,751 million gross ton-miles in Year 5, representing an increase of 69.70%. This segment is also projected to increase from 14.87 trains per day in Year 5 without the transaction to 17.87 trains per day in Year 5 with the transaction, representing a 20% increase in projected trains per day. It should be noted that local Union Pacific operational staff have indicated that 22 trains per day currently travel through Truckee (approximately 50 percent more than identified in the Data Explorer).

The Town of Truckee is particularly concerned about how this increase in freight activity may interact with conditions that already exist in Truckee.

- **Crossing delays and traffic signal improvements:** Our community regularly

experiences extended railroad crossing closures caused by passing or stopped trains at the Bridge Street crossing in the heart of downtown Truckee.
    - The Town of Truckee is currently finalizing design, right-of-way negotiations, and construction agreements to install two traffic signals at this crossing, on either side of the railroad tracks. We are concerned that, as a result of transaction-related increases in train frequency (20% increase projected in Year 5) and freight volume (69.7% increase projected in Year 5), actual post-project conditions will not reflect the future conditions modeled as part of this project planning. Specifically, our current traffic model analysis for this project indicates that a six-minute crossing gate closure results in a traffic queue that takes 30 minutes to clear. An increase in trains per day or length of gate closure could result in traffic not recovering between trains, rendering our multi-million-dollar investment in improving this track crossing less effective.
    - Additionally, we are concerned that the merger has the potential to slow down or halt this project, and that project delays may result in the Town losing critical project funding;
- **Train noise:** Our community experiences frequent train horns during daytime and nighttime hours, in compliance with the requirement for engineers to sound the train horn when approaching the Bridge Street track crossing;
- **Passenger rail service:** The California Zephyr Amtrak line, which utilizes Union Pacific track infrastructure and the Town's Train Depot, often operates substantially behind schedule due to delays along the route, particularly in the westbound direction. According to Amtrak data, during the one-year period from September 1, 2025- August 31, 2026, passenger trains experienced an average arrival delay of twenty-seven minutes and an average departure delay of forty-seven minutes when arriving and departing from Truckee's train depot. Separately, Amtrak reports that freight-train interference is the largest single source of Union Pacific-caused delay on the California Zephyr.
    - Maintaining—and ideally improving—reliable passenger rail service is essential to our regional effort to reduce vehicle miles traveled as a means to curb greenhouse gas emissions.
    - The Capitol Corridor Joint Powers Authority is working to include the corridor in the Federal Railroad Administration's Corridor Identification and Development (Corridor ID) Program, a federal program supporting the planning and development of intercity passenger rail;
- **Hazardous materials:** The Town of Truckee is aware that hazardous materials are transported through the community as part of existing freight operations; and
- **Air quality:** The Town has previously received public comments from residents expressing concern regarding the impact of frequent train idling in Downtown Truckee on air quality, greenhouse gas emissions, and associated environmental and human health impacts. These concerns warrant evaluation in the EIS, particularly because the Data Explorer identifies this segment as exceeding the Board's threshold for air quality analysis.

Given these existing conditions, the Town of Truckee respectfully requests that the EIS adequately evaluate direct, indirect and cumulative effects of transaction-related increases in freight activity on Truckee, including whether those increases could exacerbate existing conditions. Specifically, we request evaluation of:

- The projected number of trains per day through Truckee, including reconciliation of reported current operations with the Data Explorer projections;
- Proposed or potential changes in train length, weight, and operating practices associated with the projected increase in gross ton-miles;
- The frequency and duration of gate closures at the Bridge Street crossing, including effects on emergency vehicle access and response times throughout the community, increased vehicle delays and queuing, and the delivery of goods and services;
- Effects on the operation and effectiveness of the Town's planned Bridge Street traffic signal improvements;
- Changes in vehicle miles traveled and associated greenhouse gas emissions resulting from drivers taking longer alternate routes to avoid crossing closures;
- Effects on the reliability of existing passenger rail service and the ability to expand passenger rail service in the future;
- Potential increases in hazardous materials movements through Truckee and associated implications for emergency response and community safety; and
- Noise, air quality, greenhouse gas, and associated human health impacts from increased freight activity, including train horns and trains idling or otherwise remaining stopped for extended periods.

The Town of Truckee appreciates the Surface Transportation Board's consideration of these local conditions. We respectfully request that the EIS evaluate these potential impacts and identify appropriate mitigation measures where warranted.

Respectfully,



Anna Klovstad
Mayor