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RE: Docket No. FD 36873 – Union Pacific Corporation and Union Pacific Railroad Company – Control – Norfolk Southern Corporation and Norfolk Southern Railway Company; Preliminary Consultation Comments of the Town of Central, South Carolina

Dear Director Gosselin:

On behalf of the Town of Central, South Carolina, thank you for the opportunity to provide preliminary comments regarding the proposed acquisition of Norfolk Southern by Union Pacific and the scope of the Environmental Impact Statement being prepared by the Surface Transportation Board's Office of Environmental Analysis.

Central recognizes the importance of freight rail to South Carolina and to the nation's economy. At this preliminary stage, the Town is **not taking a position for or against the proposed transaction**. Rather, we are asking that the environmental review fully consider how transaction-related changes in rail operations may affect smaller communities through which these rail corridors operate and whether existing community vulnerabilities could be exacerbated.

For Central, these concerns are not theoretical.

Existing Transportation and Community Vulnerability
The Norfolk Southern rail corridor runs directly through the Town of Central and has shaped the Town's transportation network for generations.

Historically, Central had an overpass that provided an additional grade-separated means of crossing the railroad. That structure was removed in connection with prior multimodal transportation improvements. While those improvements served other transportation objectives, the result today is that Central no longer has a **full-clearance grade-separated crossing within the Town capable of reliably serving all vehicles, including larger trucks and emergency apparatus**.

The Pepper Street underpass now provides the Town's principal grade-separated crossing. However, its limited vertical clearance prevents some larger vehicles from using it, and the

surrounding Pepper Street/SC-93 intersection already experiences recurring congestion during normal weekday operations.

The remaining crossings are at grade.

When trains occupy multiple crossings simultaneously, traffic is funneled toward Pepper Street and SC-93. The result is more than an inconvenience. It creates a transportation-network vulnerability in which rail operations can effectively divide the community and significantly reduce mobility, emergency access, and network redundancy.

The Town has been working with Clemson University through Clemson Engineers for Developing Communities (CEDC), SCDOT, and other partners to evaluate these conditions and identify potential improvements. The current CEDC project specifically focuses on traffic flow and emergency access associated with rail operations in Central.

The Town is also interested in preserving and advancing the progress already made with Norfolk Southern, SCDOT, and other partners toward potential crossing, underpass, overpass, and related transportation improvements. Accordingly, Central requests that the Board consider whether the proposed acquisition could affect existing relationships, commitments, discussions, or opportunities for infrastructure improvements involving Norfolk Southern and the Town.

Hurricane Helene: A Real-World Stress Test
Hurricane Helene provided Central with a real-world example of why this transportation vulnerability matters.

Following the storm, Town officials report that a train remained stopped through Central for approximately five days. The prolonged blockage effectively bifurcated portions of the Town at a time when transportation access, emergency response, debris removal, utility restoration, and movement of assistance were especially important.

Fortunately, no major incident occurred during that period requiring access that could not be provided.

But the experience exposed a significant weakness.

If a major structure fire, medical emergency, hazardous-material incident, utility failure, or other event had occurred on the wrong side of the stopped train, the Town's response options could have been constrained. Larger trucks and some emergency vehicles cannot readily use the Pepper Street underpass because of its clearance limitations.

That experience converted what might otherwise be viewed as a traffic problem into a **community resilience and public-safety issue**.

The question is therefore not simply whether additional trains would create longer traffic delays. The question is whether increased or altered rail operations could further reduce the ability of Central to maintain essential services when disruptions occur.

Transaction-Related Change Versus Existing Conditions
The Town recognizes that many of these vulnerabilities existed before the proposed transaction and does not suggest that the acquisition itself created them.

The appropriate question for the EIS is therefore:

Would transaction-related changes in train frequency, train length, crossing occupancy, stopping or dwell patterns, commodity movements, dispatching practices, or other operating characteristics materially increase the stress placed upon an already constrained community transportation system?

The Board's consultation letter acknowledges that the proposed transaction may produce operational changes, including increases in average trains per day, on rail segments exceeding the Board's thresholds for environmental review, and South Carolina is among the states identified for further analysis.

Central therefore requests segment-specific information sufficient to understand what changes, if any, are projected for the rail corridor through the Town.

Risk, Resilience, and Local Public-Safety Responsibility
Railroads transport people and commodities through communities that have little or no ability to control train frequency, train length, commodities transported, stopping patterns, dispatching decisions, or other railroad operating practices.

Nevertheless, when significant rail disruption or an accident occurs, immediate consequence management frequently falls to local police, fire, EMS, public works, emergency management, medical providers, mutual-aid partners, and elected officials.

Communities must maintain personnel, equipment, training, emergency plans, communications systems, mutual-aid agreements, and response capacity for events generated by a transportation system over which they exercise limited operational control.

Those preparedness costs are real, particularly for smaller municipalities.

South Carolina's experience at Graniteville demonstrates that a significant rail incident can produce consequences extending far beyond the railroad right-of-way, including public-health impacts, evacuation, business interruption, transportation disruption, emergency-response demands, and long-term community recovery.

Central is not suggesting that this transaction necessarily increases the probability of such an event.

Instead, we ask:

If transaction-related operational changes increase community exposure, has the corresponding emergency-response, evacuation, transportation, health and safety, and community-resilience burden also been adequately evaluated?

Requested Scope of Environmental Review
The Town of Central respectfully requests that the Office of Environmental Analysis consider:

1. **Segment-specific operational changes.** Identify existing and projected trains per day, train length, crossing occupancy, stopping and dwell patterns, relevant commodity movements, and other material operational changes affecting the Central corridor.
2. **Blocked crossings and emergency access.** Evaluate routine and prolonged crossing blockage, simultaneous blockage of multiple crossings, alternative-route availability, traffic diversion, and potential delays to fire, EMS, law enforcement, medical access, school transportation, evacuation, utility response, and other essential services.

3. **Adequacy of grade-separated access.** Evaluate the implications of communities such as Central that lack a full-clearance grade-separated crossing capable of accommodating all emergency and commercial vehicles, particularly where multiple at-grade crossings may be blocked simultaneously.
4. **Public health, safety, and hazardous-material exposure.** Evaluate whether transaction-related changes alter community exposure to hazardous-material transportation or otherwise affect emergency planning, evacuation requirements, response capacity, or consequence-management needs.
5. **Community resilience and compound events.** Consider scenarios in which rail disruption occurs simultaneously with hurricanes, flooding, widespread power loss, severe weather, or other disasters. Central's experience following Hurricane Helene demonstrates why transportation-network redundancy must be evaluated under stressed conditions, not merely under normal operations.
6. **Local fiscal and preparedness burden.** Evaluate whether transaction-related operational changes create additional requirements for staffing, equipment, training, exercises, mutual aid, communications, traffic management, emergency response, or infrastructure investment. Where incremental burdens are attributable to the transaction, the Board should consider appropriate mitigation or funding mechanisms rather than assuming that those costs can simply be absorbed by local taxpayers.
7. **Noise, air quality, transportation, and community impacts.** Evaluate changes in train noise and horn activity, vehicle idling and congestion associated with blocked crossings, emissions, community connectivity, downtown and business access, and other quality-of-life effects.
8. **Continuity of existing infrastructure coordination.** Identify how existing discussions, agreements, commitments, or improvement efforts between Norfolk Southern and affected communities would be maintained following acquisition by Union Pacific. Central specifically seeks assurance that ongoing efforts concerning crossing access, traffic flow, and potential overpass or grade-separation improvements will not lose momentum because of organizational transition.
9. **Local data validation and consultation.** Work directly with municipalities, counties, COGs/MPOs, state agencies, emergency-service providers, and local stakeholders to validate crossing inventories, critical facilities, transportation routes, and community-specific conditions.
10. **Mitigation and post-transaction accountability.** Where material transaction-related impacts are identified, evaluate crossing improvements, grade separation, traffic-management systems, blocked-crossing monitoring, emergency-response protocols, community points of contact, operational coordination, data sharing, and other measures necessary to preserve transportation access and essential public services.

Cumulative and Regional Effects

Central also encourages OEA to examine these issues beyond individual crossings and municipal boundaries.

The same railroad corridor passes through numerous South Carolina communities. If multiple communities experience similar transportation, emergency-access, public-safety, noise, hazardous-material, or infrastructure vulnerabilities, those effects should be evaluated collectively rather than treated solely as isolated local conditions.

South Carolina's Statewide Rail Plan itself recognizes statewide needs associated with at-grade crossings and identifies grade separation and crossing improvement as potential strategies for

improving safety and mobility. The Plan also recognizes the need for coordination among SCDOT, railroads, local governments, and regional partners.

Clemson University is currently assisting the Town with GIS-based analysis of rail crossings, critical facilities, transportation connectivity, and emergency access. Central would be pleased to share validated information from that work as the environmental review progresses.

Economic and Property Continuity
The Town also has existing property and lease relationships with Norfolk Southern that support local businesses. Central requests clarification regarding how those agreements would be treated following the transaction and whether there could be any effects on existing business arrangements, property access, or other local economic interests.

If those matters fall outside the environmental review, we request guidance regarding the appropriate mechanism for addressing them with the Applicants.

Conclusion
Central supports a rail system that is safe, efficient, reliable, and economically productive.

The Town's concern is not rail growth in and of itself.

Our concern is ensuring that the **benefits and burdens of that growth are both understood**.

Central's history provides a useful example. The loss of a former grade-separated crossing, dependence upon a height-constrained underpass, recurring weekday congestion, multiple at-grade crossings vulnerable to simultaneous blockage, and the prolonged train stoppage following Hurricane Helene have created a transportation system in which relatively ordinary railroad operations can have outsized community consequences.

A future transaction that materially changes those operations should therefore be evaluated not only in terms of railroad efficiency, but also in terms of the resilience of the communities through which the railroad operates.

When changes to a national transportation system create additional consequences at the local level, small communities should not be expected to absorb those consequences without adequate analysis, coordination, mitigation, and support.

The Town of Central respectfully requests that these issues be incorporated into the scope of the Environmental Impact Statement for Docket No. FD 36873 and that affected local governments remain meaningfully engaged throughout the environmental-review and mitigation process.

Thank you for the opportunity to provide these preliminary comments. The Town looks forward to continuing to work with the Surface Transportation Board, South Carolina agencies, Clemson University, the Applicants, and neighboring communities as additional information becomes available.

Sincerely,

Ken Dill
Mayor
Town of Central, South Carolina