312877

ENTERED
Office of Chief Counsel
November 16, 2026
Part of
Public Record

November 13, 2026

Surface Transportation Board
Office of Proceedings
395 E Street SW
Washington, DC 20423-0001

Re: Docket No. FD 36873 — Proposed Union Pacific–Norfolk Southern Merger; Comments of Pittsburg Unified School District

Dear Members of the Board:

Pittsburg Unified School District hereby provides notice of its intent to participate in Docket No. FD 36873 and requests designation as a party of record. The District's designated representative for this proceeding is Sean Vandermey, Director of Facilities, 3200 Loveridge Rd, Pittsburg, CA 94565, svandermey@pittsburgusd.net, (925) 473-2438.

Pittsburg Unified School District ("District") submits these comments regarding the proposed merger of Union Pacific Railroad and Norfolk Southern Railway. The District's interest is protecting student and staff safety, maintaining reliable access to schools, preserving appropriate learning environments, and ensuring that any merger-related impacts do not impose additional costs on public education.

The District is not taking a position in support of or opposition to the proposed merger at this time. Instead, the District requests a thorough evaluation of potential effects on its schools, facilities, transportation routes, and surrounding communities, together with enforceable mitigation where warranted.

Local operating information

The District requests that the Board require the applicants to identify affected rail segments, crossings, facilities, and proposed construction within or near the District's service area. For those locations, the applicants should provide existing operations and projected operations both with and without the merger, including train frequency, length, speed, switching activity, and anticipated crossing-closure duration.

This information should be sufficiently detailed to allow the District to determine whether proposed operating changes would affect school campuses, student walking and bicycle routes, school transportation, or emergency access. Systemwide projections alone would not adequately describe potential school-level effects.

Student safety and access to schools

The District requests an evaluation of whether merger-related changes would affect at-grade crossings used by students, families, employees, or district transportation. Any evaluation should

address school arrival and dismissal periods, pedestrian and bicycle access, crossing visibility and warning systems, and the availability of safe alternative routes.

The District also requests coordination with local transportation and emergency-response agencies to evaluate whether changes in crossing occupancy could affect emergency access to campuses or evacuation routes. Where additional risks or access constraints are identified, the Board should require appropriate mitigation before the associated operational changes occur.

Learning environments and environmental conditions

The District requests that the environmental review assess potential merger-related changes in noise, horn activity, vibration, locomotive emissions, and idling near affected school sites and district facilities. The analysis should consider classroom instruction, outdoor learning, physical education, athletics, and other school activities.

Where the analysis identifies impacts requiring mitigation, the District requests specific measures, implementation schedules, responsible parties, and a means of verifying effectiveness.

District facilities and public costs

Any proposed rail construction or operational changes affecting district property, access, fencing, drainage, utilities, or planned facilities work should be identified and coordinated with the District in advance.

The District requests that the Board require the applicants to fund mitigation necessary to address identified merger-related impacts attributable to their operations. Such costs should not be shifted to the District or reduce resources available for students and educational programs.

Accountability and continuing coordination

If the Board approves the merger, the District requests that any conditions addressing local impacts be measurable and enforceable. Appropriate conditions should include:

- A designated railroad contact for district safety, access, and facilities concerns.
- Advance notice and coordination for construction or operational changes materially affecting schools.
- Monitoring and reporting at locations where impacts are identified.
- A clear process for investigating complaints and implementing corrective measures.
- Meaningful district participation in developing school-specific mitigation.

The District recognizes that the proposed merger’s effects must be evaluated using reliable local information. These comments do not presume that adverse effects will occur. They request that potential impacts be identified, disclosed, and addressed before changes affecting school communities are implemented.

Thank you for considering the interests of Pittsburg Unified School District and the students, families, and employees it serves.

Sincerely,

Sean Vandermey

Sean Vandermey
Director of Facilities
Pittsburg Unified School District
3200 Loveridge Road
Pittsburg, CA 94565
Bus: (925) 473-2438
Email: svandermey@pittsburgusd.net

Copy: All Parties of Record