ROANOKE COUNTY

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Office of Chief Counsel
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Via Electronic Filing
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

Roanoke County, Virginia, appreciates the opportunity to submit comments for the record regarding the proposed Norfolk Southern–Union Pacific (NS–UP) merger. The City of Roanoke was the headquarters for the Norfolk and Western Railway starting in 1882, through its merger with Southern Railway in 1982 when the company became Norfolk Southern, until 2015. Railroad tracks run to the north, south, east, and west across Roanoke County, with dozens of trains, including Amtrak, running daily routes through the Roanoke Valley.

Roanoke County seeks to ensure that the potential NS-UP merger supports safe operations, transparent collaboration, community livability, and expanded multimodal transportation. The following comments reflect Roanoke County priorities, adopted plans, and ongoing areas of cooperation with the railroad. Roanoke County appreciates its current relationship with Norfolk Southern and anticipates a continued productive relationship with the potentially merged companies.

1. Opportunities for Eliminating Railroad Crossings and Providing Safe Crossings for Multiple Modalities

Roanoke County encourages the enhancement and elimination of at-grade crossings where feasible. Roanoke County requests an improved, streamlined process for the following:

- Ensuring that rail operations do not obstruct at-grade crossings during peak hours, particularly where no other access is available. Existing crossings at Layman Road and Glade Creek Road are consistently blocked by stopped trains, and Roanoke County is investigating combining and converting these two at-grade crossings into one grade-separated crossing to facilitate uninterrupted access for all vehicles, particularly for emergency responders and school buses.
- Identifying high-risk crossings for elimination/grade separation.
- Upgrading at-grade crossings near community facilities to accommodate pedestrians, cyclists, and mobility-impaired users.

- Ensuring that design and safety treatments comply with regional multimodal plans and Virginia Department of Transportation (VDOT) requirements.

A predictable project coordination process, dedicated contacts, and upfront communication ensure a safe, efficient transportation network for all users.

2. Reducing Train Crashes and Derailments

At least eight train crashes have occurred in Roanoke County over the past nine years, including a recent crash involving a train and a tractor-trailer on Garman Road in September 2026. An October 2020 train derailment along Barley Drive occurred due to a collapsed railroad bridge over the Roanoke River. The derailment resulted in train cars and coal falling into the Roanoke River and the blockage of Barley Drive, which is the only access point for several families living at the end of the roadway. While Roanoke County acknowledges that rail remains a comparatively safe mode of freight transportation, repeated events highlight the need for:

- Maintaining rail infrastructure in a state of good repair.
- Identification of risk-reduction strategies and infrastructure improvements.
- Regular communication between railroad representatives, Roanoke County, and Virginia Department of Emergency Management staff, with proactive road closure information, boots-on-the-ground response, and contingency planning and preparedness.
- Continued improvement of rapid-response protocols and communication to protect nearby neighborhoods, roadways, and environmental resources.

Roanoke County requests continued safety communication procedures and a dedicated liaison for local governments, with transparency for local government contacts and appropriate railroad personnel for proactive crisis management and response efforts when needed.

3. Expansion of Amtrak Passenger Rail Service

The Roanoke County 200 Plan (Comprehensive Plan) adopted by the Board of Supervisors in 2024 includes the recommendation, "Support the expansion of Amtrak service to and beyond Christiansburg." Roanoke County requests protection of existing Amtrak service to Roanoke and continued support for the 2027 expansion to Christiansburg. To this end, please avoid operational decisions that reduce service reliability and/or frequency.

Roanoke County also encourages cooperation with the Virginia Department of Rail and Public Transportation (DRPT) to facilitate further expansion of passenger rail throughout Virginia, consistent with the Virginia Statewide Rail Plan.

4. Expansion of the Freight Network

Roanoke County supports continued expansion of rail networks to facilitate the movement of freight within and outside of Virginia, as outlined in the Virginia Statewide Rail Plan.

The Gateway Investment Program currently underway at the Port of Virginia is expanding transportation and economic benefits for the Commonwealth of Virginia and beyond. The potential merger could provide seamless rail access between the Port of Virginia and current Union Pacific markets stretching to the West Coast.

5. Improving communication and coordination for projects near or within railroad right-of-way

As development activity increases in areas adjacent to rail corridors, early coordination is critical. Roanoke County requests that the following measures be established:

- A dedicated point of contact for planning and land development matters.
- Standard requirements to share with localities for use when projects are planned near or crossing railroad right-of-way.

The Roanoke County 200 Plan also includes the recommendation, "Complete the Roanoke River Greenway in Roanoke County between Montgomery County and Franklin County." Roanoke County is currently collaborating with VDOT to design a pedestrian bridge for the Roanoke River Greenway over railroad right-of-way near Niagara Dam. This project is a critical missing link and would complete the trail connecting Roanoke City to the Blue Ridge Parkway and to Explore Park. While previous conversations with Norfolk Southern and its contractors have been helpful, continued collaboration and coordination, including on necessary agreements and permitting to cross railroad right-of-way, will be instrumental to the success of the greenway expansion.

6. Coordinating on Rails-to-Trails Opportunities

Roanoke County is interested in rails-to-trails greenways and would appreciate collaborating on any potential opportunities. Roanoke County respectfully requests:

- Early notification when a line is under consideration for discontinuation of service.
- A cooperative, standardized approach for negotiating use agreements.

7. Improving Coordination for Track Maintenance and Improvements

Multiple rounds of track maintenance and improvements at roadway crossings have taken place within Roanoke County over the past two years, with more planned by the end of 2026. Communication needs to be improved between contractors, the VDOT Salem Residency, and Roanoke County staff. Roanoke County requests:

- A consistent outreach process and early warnings for any work that will impact roadways.
- A reliable way to keep citizens informed about road closures and other traffic delay information related to railroad maintenance and projects.

Effective communication prevents conflicts, improves safety, and reduces citizen concerns.

Conclusion

Roanoke County looks forward to continued and improved collaboration with the railroad industry and appreciates the Surface Transportation Board's consideration of these comments to ensure rail operations remain safe, reliable, and compatible with local, regional, and state priorities and plans.

Sincerely,



Doug Blount
Deputy County Administrator

cc: U.S. Department of Transportation, U.S. Department of Justice (Antitrust Division), UP & NS respective legal counsels, and Parties of Record