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November 17, 2026
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Before the
SURFACE TRANSPORTATION BOARD

STB Docket No. FD 36873

UNION PACIFIC CORPORATION AND UNION PACIFIC RAILROAD COMPANY
- CONTROL –
NORFOLK SOUTHERN CORPORATION AND
NORFOLK SOUTHERN RAILWAY COMPANY

COUNTY OF WILL, ILLINOIS OPENING COMMENTS AND REQUESTED CONDITIONS AND RELIEF

I. PRELIMINARY COMMENTS AND CONCERNS

A. Localized Highway and Intermodal Roadway Congestion

- The Applicants project substantial diversion of freight from highways to intermodal rail. However, that intermodal traffic must be transferred to trucks at local terminal facilities.
- Additional container volume processed at terminals within Will County will significantly expand heavy commercial truck traffic onto local arterials (e.g., I-80, I-55, Route 53, and County Highways). Applicants must not be permitted to shift interstate line-haul efficiencies onto local road networks without mitigation.

B. Commuter and Passenger Rail Conflicts (Metra and Amtrak)

- UP and NS tracks in and around Will County share corridors or interchange points with Metra commuter services (e.g., Southwest Service, Heritage Corridor, Rock Island District) and Amtrak routes serving Downstate Illinois.
- Increased freight train counts, or longer train lengths, must not degrade passenger rail on-time performance or preclude future frequency expansions sought by regional transit agencies.

II. PRELIMINARY REQUESTED CONDITIONS AND RELIEF

Should the Board ultimately approve the proposed control transaction, Will County respectfully submits that approval must be conditioned upon binding mitigation measures under 49 U.S.C. § 11324, including:

A. **Capital Infrastructure & Grade Separations:** Mandatory Applicant contributions toward key highway-rail grade separation projects and intelligent transportation system (ITS) advance-warning crossing sensors in Will County.

B. **Local Roadway Maintenance Mitigation:** Capital contributions toward Will County roadway and bridge preservation directly affected by increased drayage trucking associated with expanded terminal volume.

C. **Rock Island District Commuter Rail Expansion & Bridge Infrastructure:** Condition approval upon mandatory Applicant capital co-funding toward critical rail bridge and track capacity projects on the Metra Rock Island District (RID) corridor, specifically: 1. Rail Flyover & Bridge Infrastructure (CREATE Project P2): Financial contributions to complete the dedicated passenger rail flyover bridge connecting the Rock Island District with surrounding rail corridors, ensuring freight separation across the 75th/80th Street corridor; 2. Rock Island 3rd Mainline & Rail Bridge Capacity (RI3): Direct co-investment in rail bridge renewals, track installation, and high-speed universal crossovers between Gresham and Joliet to establish triple-track operational flexibility—providing the physical capacity required to expand peak and off-peak commuter frequencies, reverse commutes, and future regional intercity service (including the planned Peoria-to-Chicago passenger corridor); and 3. Joliet Terminal Rail-to-Rail Chokepoint Relief: Capital improvements to modernize and

grade-separate critical rail-to-rail diamonds and interlockings east of Joliet Union Station, preventing queuing Class I freight traffic from fouling Metra terminal platforms and equipment turnaround moves.

III. CONCLUSION

Will County intends to actively participate throughout all phases of this proceeding—including the evidentiary hearings and environmental review—to ensure that the public interest, local infrastructure, and safety of Will County residents are fully protected.

Respectfully submitted,

By: Erika M. Hamer

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Counsel for The County of Will, a Body Corporate and Politic

Dated: November 17, 2026

CERTIFICATE OF SERVICE

I hereby certify that on this 17TH day of November 2026, I have caused the foregoing Opening Comments to be served electronically on all parties of record in this proceeding, Docket No. FD 36873, Administrative Law Judge Jennifer Soulikias, the Applicant's Representatives, Mr. Rosenthal (representing UP) and Mr. Atkins (representing NS), the Secretary of Transportation, and the Attorney General of the United States.

Erika M. Hamer

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