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November 17, 2026

**BEFORE THE SURFACE TRANSPORTATION BOARD**

**Docket No. FD 36873 Union Pacific Corporation and Union Pacific Railroad Company—Control—Norfolk Southern Corporation and Norfolk Southern Railway Company**

To the Members of the Surface Transportation Board:

On behalf of the Northeast Ohio Areawide Coordinating Agency (NOACA), I write to offer our comments regarding docket number FD 36873 concerning the proposed merger of Union Pacific Corporation and Norfolk Southern Corporation.

NOACA is the federally designated metropolitan planning organization (MPO) that represents the five counties of Greater Cleveland: Cuyahoga, Geauga, Lake, Lorain, and Medina. NOACA addresses the transportation, air quality, and water quality needs of Northeast Ohio, and works with its partners to develop and implement plans to ensure that travel throughout the region is safe, cost-effective, and environmentally sound. NOACA is responsible for the development of the Long Range Plan (LRP), the Transportation Improvement Program (TIP), and the Comprehensive Economic Development Strategy (CEDS) for the region.


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**Grace Gallucci, Executive Director & CEO**



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NOACA believes that the proposed merger of Union Pacific (UP) and Norfolk Southern (NS) presents opportunities for increased connectivity and operational efficiency that can potentially benefit freight rail customers, the millions of consumers who rely on goods shipped by rail, and passenger rail travelers. However, any merger agreement must include protections for local communities against any adverse effects of increased traffic and deteriorating and aging infrastructure. In addition, any merger agreement needs to ensure that passenger rail service, both current and future, will be provided predictable, efficient, safe, and timely access to rail corridors. Under this agreement, if approved, passenger rail service should not be routinely subjected to delays behind freight traffic.

In the five county NOACA region, there are currently 276 route-miles of trackage owned and operated by NS--about 143 miles of main line trackage, with the remainder consisting of industrial, yard, and other trackage. According to the Federal Railroad Administration (FRA), the railroad currently has 377 road crossings in the area, of which 211 are grade separated. The combined railroad anticipates increases of 12 to 36 percent in daily trains over the next five years on the various lines which serve our region, with gross tonnage on trains increasing by anywhere from 18 to 45 percent over the same time period.

Despite the abundance of rail infrastructure currently owned and operated by NS in our region, and despite the anticipated increase in both the number and size of trains that the proposed combined railroad would operate through our region, a filing submitted to the STB for environmental review listed no projected capital improvement projects in the NOACA area. For this merger to be successful, UP and NS need to commit to ensuring that potentially harmful byproducts can be mitigated for those located closest to their infrastructure. NOACA stands ready to work with the proposed railroad and our constituent communities to cooperatively develop infrastructure solutions that work for all stakeholders. We encourage the Board to require the combined railroad to maintain meaningful ongoing working relationships with MPOs like NOACA, state rail planning bodies like the Ohio Rail Development Commission, and local governments like the ones that our organization serves. Timely communication regarding infrastructure improvements and repairs, operational changes, and anticipated construction work will help to build a relationship based on trust and mutual benefit.

The NOACA Board of Directors has long prioritized improved and expanded passenger rail service in our region. Currently, only two Amtrak trains serve the NOACA region, the *Floridian* and the *Lake Shore Limited,* with scheduled

stop times in Cleveland and Elyria in the middle of the night. This does not serve the needs of our region's residents; the overnight timing of the station stops means that passenger rail cannot currently meaningfully contribute to furthering the region's mobility goals. We seek to take advantage of the central location of our region to expand passenger rail service to adjacent regions such as Buffalo and Pittsburgh to the east, Chicago and Detroit to the west, and Columbus and Cincinnati to the south. To do this, we will need the cooperation of Class I freight railroads like the combined UP-NS.

Currently, the merger application as submitted only appears to honor commitments to maintaining existing Amtrak service, with no consideration of routes that are currently or could eventually be included in the FRA's Corridor Identification & Development (Corridor ID) program, or any other potential expansions of Amtrak service. The demand for fast and frequent passenger rail service continues to grow, as shown by Amtrak once again registering record ridership during this past fiscal year. The ongoing increase in interest in passenger rail can redound to the benefit of both passenger and freight services, but host freight railroads like the proposed UP-NS need to accommodate current and future passenger rail service, and the STB must make this an enforceable commitment as part of any merger, with a clear and transparent process for requesting additional passenger rail service. NOACA

would be happy to advocate for rail infrastructure investments at the state and federal levels that will help to improve the safety and efficiency of the freight and passenger rail networks.

NOACA certainly recognizes the potential economic and operational benefits that could be realized by a transcontinental freight railroad like the proposed UP-NS entity. We also believe, however, that these benefits must be balanced against the needs of the public for safe and reliable rail transport that accommodates the needs of passenger rail and the safety and well-being of residents in our communities. We encourage the Board to include conditions for the approval of this merger that include specific and enforceable provisions related to capital investment, infrastructure repairs (i.e. crumbling overpass bridges), rail safety, and the preservation and expansion of access for passenger rail users. A successful combined railroad should be able to deliver on its stated intended benefits while serving customers and stakeholders here in Northeast Ohio and in regions throughout the country.

Sincerely,



Grace Gallucci
Executive Director & CEO

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**BEFORE THE SURFACE TRANSPORTATION BOARD**

**Docket No. FD 36873**
**UNION PACIFIC CORPORATION AND UNION PACIFIC RAILROAD COMPANY—CONTROL—NORFOLK SOUTHERN CORPORATION AND NORFOLK SOUTHERN RAILWAY COMPANY**

## CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of November, 2026, I have caused a true and correct copy of the foregoing Comments of the Northeast Ohio Areawide Coordinating Agency in Docket No. FD 36873 to be served upon the following required recipients and all other parties of record on the official service list in this proceeding via electronic mail.

**Secretary of Transportation**
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**Hon. Jennifer Soulikias**
Administrative Law Judge
Surface Transportation Board
395 E Street SW
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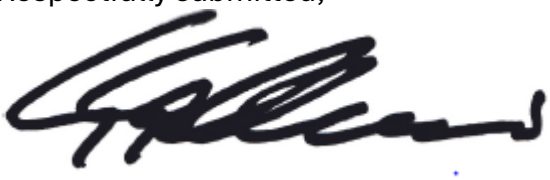
Respectfully submitted,



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