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

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

The City of Redlands is a full-service municipality in San Bernardino County, California, representing approximately 74,000 residents across 36 square miles in the eastern Inland Empire. Incorporated in 1888, Redlands is a diverse community with established residential neighborhoods, major healthcare facilities, educational institutions, commercial districts, and a growing regional economy.

As the local government responsible for protecting public health and safety, maintaining municipal infrastructure, and representing the interests of its residents and businesses, the City of Redlands has a direct interest in how the proposed railroad merger may affect freight operations along the San Timoteo Canyon corridor.

The corridor's proximity to residential areas, local roadways, and environmentally sensitive canyon lands creates important considerations involving rail safety, emergency access, noise, vibration, and environmental impacts. The emphasis on grade crossings and emergency access is supported by the City's adopted General Plan, which specifically calls for improvements to San Timoteo Canyon rail crossings and consideration of grade separations. The City's 2025 Community Wildfire Protection Plan also identifies the canyon's freight railroad and wildfire-related evacuation concerns.

The risks of additional rail traffic from the proposed merger isn't just an inconvenience, it's a threat to public safety in the City of Redlands. The City has deep concerns about the potential impacts of the proposed Union Pacific–Norfolk Southern rail merger on public safety, emergency access, and regional mobility. The merger threatens to cut off emergency services to

vulnerable populations. The proposed merger would worsen existing conditions. Even before the merger, rail operations already cause significant disruptions, with long trains regularly delaying emergency transport and stopped trains having blocked emergency traffic for up to six hours. Continued growth in the jurisdictions surrounding these crossings makes these conditions increasingly concerning. Alessandro Road, which connects Redlands and Moreno Valley via San Timoteo Canyon Road, carries approximately 5,410 vehicles daily. Any increase in train frequency or length could worsen congestion, particularly during peak hours, and compromise emergency access at this crossing and at Fern Avenue and San Timoteo Canyon Road, an important route to Redlands Community Hospital.

Additional rail traffic could also increase exposure to hazardous materials incidents, derailments, collisions, and fires, placing greater demands on emergency responders in a canyon where terrain and limited access already present substantial challenges. Such incidents could impede evacuations during wildland fires and disrupt mutual aid with neighboring jurisdictions. The City is also concerned about cargo theft, which has increased locally and prompted ongoing coordination with Union Pacific. A recent incident involving a van filled with stolen rail cargo blocking the tracks illustrates the associated security and operational risks.

The City urges a thorough assessment of the merger's cumulative local and regional impacts and requires meaningful, enforceable mitigation to protect affected communities. Measures should preserve emergency access, prevent prolonged crossing blockages, address cargo theft, provide timely information about hazardous materials movements and rail incidents, and ensure effective coordination with local emergency response agencies. Existing public safety challenges must be addressed, and any approval must include safeguards against further deterioration of emergency access and community safety. Any decision to move forward with the merger should include adequate funding for a grade separation in the City of Redlands.

Respectfully,

Charles M. Duggan Jr.

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CC: All Parties of Record