313070

ENTERED
Office of Chief Counsel
November 19, 2026
Part of
Public Record

BEFORE THE
SURFACE TRANSPORTATION BOARD

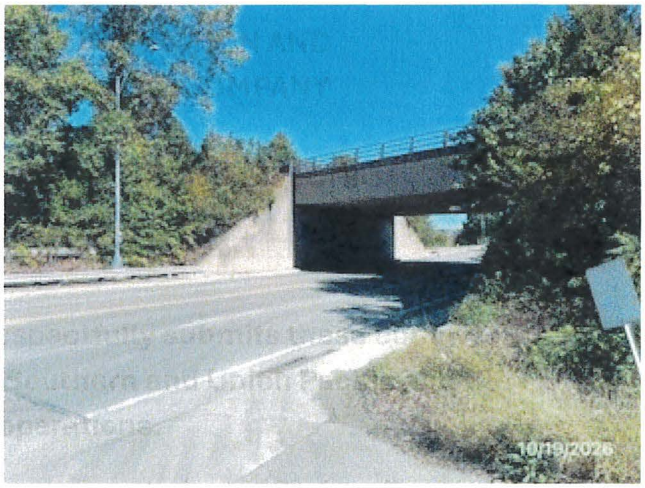
FINANCE DOCKET NO. 36873

UNION PACIFIC CORPORATION AND
UNION PACIFIC RAILROAD COMPANY
—CONTROL—
NORFOLK SOUTHERN CORPORATION AND
NORFOLK SOUTHERN RAILWAY COMPANY

COMMENTS OF THE CITY OF SHARONVILLE, OHIO

The City of Sharonville, Ohio (the "City") respectfully submits these comments regarding the proposed merger of Norfolk Southern and Union Pacific and the consolidation of their respective railroad operations.

In August 2026, the City of Sharonville became aware through a Surface Transportation Board notice that conditions of the Union Pacific and Norfolk Southern Railway merger includes $26.4M worth of capacity improvements to Sharonville Intermodal Yards, located in Sharonville, Ohio. Estimated impacts provided in the STB documentation revealed that the improvements would result in a 184% increase in intermodal (rail-to-truck or truck-to-rail) transfers at the site and an increase in overall freight – including hazardous material freight – moving through the yard.



View along Sharon Road from existing semi-truck exit from Sharonville Intermodal Yard. The railroad bridge significantly limits visibility of traffic approaching from the east.

The yard operations come with some significant impacts on the surrounding community and the capacity expansion is expected to increase many of these impacts. There are two at-grade crossings to the immediate north of the yard entrance that are among the most frequently blocked and blocked for the longest duration crossings in the country (please refer to specific data provided below). When trains must enter the yard

from the south, the operation requires trains to back into the yard and causes blockages at multiple crossings in the City of Reading, Ohio. There are ongoing concerns with how trucks exit the yard onto Sharon Road due to poor sight distance at the current driveway. Also, the yard sits immediately next to two significant streams and directly above a regional aquifer that provides drinking water for over one million residents in the region.

The City of Sharonville welcomes the opportunity this significant investment into Sharonville Yard brings for the city and Norfolk Southern to work cooperatively to address the issues outlined below:

- **Increased truck traffic / turning movements at the driveway access on Sharon Road.** Most trucks entering the site arrive on Sharon Road from the west (right turn into the yard). Most trucks leaving turn left onto Sharon Road. The existing driveway location has poor visibility to the east, making these left-turns a somewhat dangerous maneuver. Also, occasionally trucks sit on Sharon Road cueing to get into the yard and block the Medallion Road intersection. The railroad needs a solution that better handles the anticipated increase in semi-trucks in and out of the yard and provides a safer environment for the trucks to turn out onto Sharon Road.

- **Increased freight volumes mean more trains and/or longer trains, which will increase the number and duration of closures at the Reading Road and Kemper Road at-grade crossings.** Sharonville receives data from TRAINFO regarding closures at five of the rail crossings in the city. According to this data (attached), in a 24-day period, the Reading Road crossing at the northern entrance to the yard saw an average closure time of 5.4 hours per day and Kemper Road was closed an average of 2.9 hours per day with each crossing averaging 15 closures per day. Half of the closures at Reading Road exceed 20 minutes in duration, while nearly a third of the closures at Kemper Road last longer than 20 minutes. Occasionally, these closures last extremely long – the longest closure at Reading Road lasted 5.5 hours and the longest closure at Kemper Road measured 8.3 hours.

  These closures have a significant impact on public safety for residents of the subdivision along Hageman Ave, as well as businesses accessed by Hill Street and along Reading Road between the rail crossing and Kemper Road. Emergency response from the nearest fire station would, in the event of a closure at Reading Road, increase from less than ½ mile and less than 2 minutes to more than 3.5 miles and more than 10 minutes to circumvent the closure. A rail closure in the nearby Village of Lockland on October 17, 2026 resulted in a similar delay in response to a house fire that unfortunately contributed to the death of an elderly resident.

The severity of closures at these two crossings is markedly worse than two years ago. Then, the crossing at Sharon Road, on a separate rail line from the yard, was the city's worst crossing. At that time, the city committed to an engineering study of a grade separation at the Sharon Road crossing only to subsequently observe the railroad operations shift in a way that moved the impact to the Reading and Kemper crossings, frustrating the city's efforts to plan around the railroad impacts.

The City of Sharonville would like to see the following steps taken to address persistent closures at crossings stemming from yard operations:

→ Better communication and cooperative planning between the railroad and the city to address significant changes in impacts to rail crossings.

→ Improvements within the yard that would lessen the impact to the Reading Road and Kemper Road crossings from the process of breaking down and assembling trains (the main cause of lengthy closures).

→ Financial participation in the establishment of a grade-separated crossing at Reading Road and Kemper Road to mitigate the frequent and lengthy closures.

- **Improvements to reduce the risk and potential impacts from hazardous material spills.** The information provided by the Surface Transportation Board regarding the merger and improvements / environmental impacts at Sharonville Yards indicate the number of rail cars carrying hazardous materials through the yard would increase. The city would like to engage with the railroad to better understand existing spill containment infrastructure and response procedures currently in-place at the Yard and discuss opportunities available in the capacity improvement project to enhance these capabilities. The Yard is directly adjacent to the Sharon Creek and Mill Creek (track mere feet from the top of bank) and is directly overtop an aquifer that provides drinking water for more than 1 million residents in the region. We would like to see planned improvements in the Yard used as an opportunity to improve current safeguards against spills affecting these regionally important water sources, including:

  → A permanent spill barrier 24" high installed along the top bank of Sharon Creek for the length of the yard.

  → An agreement between the railroad and the city outlining the handling and storage cars containing hazardous materials in the yard – namely prohibits the long-term storage of cars containing hazardous materials and also the transfer of liquid hazardous materials; outlining ongoing coordination with

Sharonville Fire and Police on spill response planning; and requiring the railroad to notify the city of any proposed changes to the handing and storage of hazardous materials in the yard, which would then initiate a re-evaluation of the coordinated spill response plan.

→ The railroad shall maintain spill response materials and equipment on-site, including portable spill catch pans and deployable containment barriers, and provide training to yard workers on their use to contain minor spills.

- **Airborne dust and surface dirt tracked out onto Sharon Road have been periodic concerns of the community and surrounding neighbors of the Yard.** We'd like to see measures included within the proposed yard improvements that reduce dust and dirt impacts to the extent feasible.

The City appreciates the Board's consideration of these comments and urges the Board to carefully evaluate the long-term consequences of this proposed consolidation before authorizing a transaction that could fundamentally alter the nation's freight rail network.

Respectfully submitted,

Jim Lukas
Safety Service Director
City of Sharonville, Ohio

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing City of Sharonville's Comments have been electronically filed with the Surface Transportation Board and served on all Parties of Record in Docket #FD36873 by electronic mail or by first-class mail by the 28th day of November 2026.

s/Jim Lukas

CC: Parties of Record