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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

November 18, 2026

COMMENTS OF THE CITY OF RENO, NEVADA

The City of Reno, Nevada respectfully submits these comments regarding the proposed acquisition of Norfolk Southern by Union Pacific and the resulting combination of the two rail systems. The City filed a notice of intent to participate in this proceeding in September 2026.

Union Pacific's main line runs through the center of Reno, including its downtown core, and Union Pacific tracks cross City streets at 25 at-grade crossings. The City therefore has a direct interest in how the transaction will affect rail operations, public safety, and City infrastructure in Reno.

The City does not submit these comments to address the competitive merits of the proposed transaction, and the City takes no position for or against it. Rather, we ask the Board to ensure that its review accounts for conditions specific to Reno, and that any approval is accompanied by commitments from Union Pacific to work with the City to address them.

Reno's Relationship with the Union Pacific Main Line

Reno has been here before. In the Board's review of the 1996 merger of Union Pacific and Southern Pacific, Reno was one of two communities identified as needing tailored mitigation. That process led to the Reno Transportation Rail Access Corridor (ReTRAC) project, which lowered the main line into a trench through downtown Reno and removed at-grade crossings from the city center.

The City owns and maintains the ReTRAC trench structure, and Union Pacific operates its trains through it. The trench has served the community and the railroad well, and keeping it in good condition matters to both. Changes in the number, length, and weight of trains through the trench bear directly on the City's long-term maintenance responsibilities.

Outside the trench, many of the City's 25 at-grade crossings are governed by long-standing agreements between the City and Union Pacific or its predecessor railroads. These agreements set out who maintains the crossings and who pays for that maintenance.

Effects of the Transaction in Reno

Based on information Union Pacific has made available for this proceeding, the transaction is expected to add an average of about three trains per day on the rail segment west from East Fourth Street through downtown Reno, and about four trains per day on the segment east from East Fourth Street through Sparks. Union Pacific representatives have also indicated a larger proportional increase in freight tonnage, which the City has asked Union Pacific to confirm. Both segments exceed the Board's threshold for air quality analysis.

City staff met with Union Pacific representatives in September, and in October the City provided Union Pacific a list of written questions covering train traffic, hazardous materials, the trench, crossings, and public safety. We appreciate Union Pacific's willingness to discuss these questions and its offer of follow-up meetings with its subject matter experts. The City expects to continue that dialogue.

The City also recognizes the transaction's stated goal of shifting freight from highways to rail, which may benefit the region's roadways, and understands that Union Pacific expects the most significant effects of the transaction to occur elsewhere on its network. Our requests are limited to effects that are specific to Reno.

A Framework for Cooperation

Freight railroads understandably must protect the safety, reliability, and capacity of their operations. The City is not asking the Board to impose requirements that would interfere with safe and efficient rail service. We are asking that the effects specific to Reno be studied, and that Union Pacific commit to working with the City to address them.

If the transaction is approved, we encourage the Board to obtain commitments from Union Pacific that include:

1. **Trench engineering review.** Union Pacific should work with the City on a joint engineering review of how added train frequency and tonnage affect the ReTRAC trench, and should share its structural and loading records for the trench. Where the review shows the transaction adds wear to elements the City maintains, Union Pacific should share in the added maintenance cost in proportion to the transaction's effect.

2. **Environmental review of the trench corridor.** Because both Reno segments exceed the Board's threshold for air quality analysis, the Environmental Impact Statement should evaluate air quality within and around the downtown trench, including its covered sections, taking into account the ventilation and safety requirements that apply to them.

3. **Hazardous materials and emergency response.** Union Pacific should coordinate with the Reno Fire and Police Departments on response planning for incidents in the downtown trench, confirm that City emergency dispatch can access real-time information on train contents, and notify the City when the volume or type of hazardous materials moving through Reno changes significantly.

4. **At-grade crossings.** Union Pacific should minimize the time trains block public crossings in Reno, provide the City with projected blocked-crossing times by crossing, bear the cost of signal or crossing work made necessary by the transaction rather than shifting it to the City, and confirm that existing crossing agreements with the City carry forward to the combined company.

5. **Public safety and trespass prevention.** More and longer trains increase the risk to people who access the tracks, particularly in the downtown corridor. Union Pacific should partner with the City on trespass prevention, including physical measures, detection technology, and coordination with the Reno Police Department and the City's homeless outreach efforts.

6. **Transparency and follow-through.** Union Pacific should confirm in writing its projected train counts and tonnage for the Reno segments, report actual train counts, tonnage, and hazardous materials volumes during the Board's oversight period, and work with the City to revisit these commitments if actual traffic exceeds projections.

7. **Good-faith cooperation.** Union Pacific should continue timely, good-faith discussions with the City toward a written agreement addressing these items before the Board's final decision.

These requests are reasonably related to the transaction's effects in Reno, and none would require Union Pacific to change how it operates its network elsewhere.

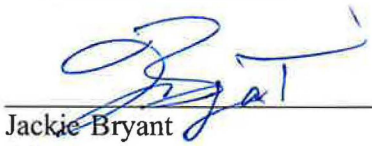
A Continuing Partnership

Reno and Union Pacific have a long history of working together, most visibly on the ReTRAC project that followed the 1996 merger. The City values that partnership and appreciates Union Pacific's outreach to date.

The City of Reno therefore respectfully requests that, in considering Docket No. FD 36873, the Board ensure that its environmental review addresses the conditions described above, and encourage or require, as appropriate, commitments from Union Pacific to work with the City on them. At a minimum, any approval of this transaction should preserve, not diminish, the City's ability to maintain a sound trench structure, safe crossings, and effective emergency response where the main line runs through Reno.

The City stands ready to work constructively with Union Pacific, the Board, and our regional partners in the City of Sparks and Washoe County to address these matters.

Respectfully submitted,



Jackie Bryant
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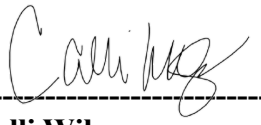
CERTIFICATE OF SERVICE

This is to certify that on the 18th day of November 2026 that a copy of the foregoing Comments of the City of Reno, Nevada was been electronically filed with the Surface Transportation Board and served upon the upon all parties of record in FD 36873 by electronic mail to each party of record that lists an email address on the Board's service list and by mail to each party of record that does not list an email address on the Board's service list.



Calli Wilsey
Director of Policy and Strategy
City of Reno

Dated: November 18, 2026