City of Birmingham
Office of Mayor Randall L. Woodfin

710 North 20th Street
Birmingham, AL 35203
(205) 254-2771

313034
ENTERED
Office of Chief Counsel
November 18, 2026
Part of
Public Record

November 18, 2026

Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423-0001

RE: Docket No. FD 36873- Union Pacific Corporation and Union Pacific Railroad Company- Control- Norfolk Southern Corporation and Norfolk Southern Railway Company

Dear Members of the Surface Transportation Board,

I am Randall L. Woodfin and I serve as the Mayor of the City of Birmingham, Alabama. The City of Birmingham submits this letter in response to the proposed merger between Union Pacific and Norfolk Southern currently under review by the STB.

Currently, the City of Birmingham does not take a position on the proposed merger. However, we do have concerns regarding the merger that we would like to have both documented and remedied. Birmingham is a major rail hub, functioning as the eastern most gateway city where east and west railroads touch and interchange. Being a major rail hub comes with pros and cons. Positives include Birmingham being strongly positioned to recruit and retain industrial jobs, especially in the logistics, intermodal, and manufacturing sectors. Negatives include noise and blocked crossings, resulting in delays and traffic stoppages, which are daily challenges for our residents.

Birmingham has developed relationships with the railroad operators in the area to leverage positive aspects of being a rail hub, while working alongside them to also address the challenges. This is most notably reflected in CRISI funded REDSIGN Alabama project, a 10-million design grant to close nine rail crossings, build an overpass and an underpass, and add track capacity in and out of Norris Yards. REDSIGN, which is being pursued in partnership between the City of Birmingham and Norfolk Southern, is a prime example of what can be done when railroads and

710 North 20th Street
Birmingham, AL 35203
(205) 254-2771

municipalities work together. Norfolk Southern, to their credit, has been a strong partner, that we greatly appreciate.

The proposed merger, as currently presented, would not only replace a strong rail partner with an unknown entity, but it is predicted to result in a 40% increase in rail traffic along the Alabama Great Southern, which pans the entire city of Birmingham. That is not an insignificant increase and would result in a significant strain on our transportation infrastructure. Additionally, The city of Birmingham benefits from the current division of Class I railroads by being the easter most gateway city where east and west railroads touch. By creating a coast-to-coast railroad, this merger has the potential to significantly impact Birmingham's competitive advantage in the region in recruiting and retaining jobs especially in the industrial and intermodal sectors.

In the spirit of partnership, the City of Birmingham is not opposing the merger. However, considering the risks Birmingham faces we ask that, if the Surface Transportation Board approves the merger that it will do so with following conditions outlined below by condition type. The city is also presenting these condition requests to both railroad companies directly in the hopes that they will continue to be partners in visioning how the rail network in Birmingham can best function for both the railroads and the community.

I. Infrastructure Needs

The current merger documents anticipate a 40% increase in traffic along the main Norfolk Southern Line in Birmingham, which could result in significant strain on our transportation infrastructure. Therefore, If the merger is approved, The City of Birmingham is requesting that following conditions be applied and enforced by the STB during their oversight period:

1. Union Pacific, in partnership with the City of Brimingham and the City of Trussville must have the REDSIGN Alabama Project under construction within 7 years of the completion of the merger with Norfolk Southern.
2. REDSIGN Alabama is not envisioned as a single project but as a corridor redesign. Therefore, If the merger is approved, the STB shall cause Union Pacific to work with the City of Birmingham and other communities in the metro area to apply for and secure funding for the planning and construction of additional grade separation projects along the AGS line, where feasible, and then along the other UP lines in the Brimingham area.

710 North 20th Street
Birmingham, AL 35203
(205) 254-2771

3. If the merger is approved the STB shall cause UP to create quiet zones, where feasible, in areas of Birmingham where their rail lines abut residential areas.
4. If the merger is approved, the STB shall cause UP to provide annual onsite training to local first responders on how to adequately respond to a railroad emergency.
5. If the merger is approved the STB shall cause UP to adopt as their own Norfolk Southern's process for communities to do beautification projects to UP facilities, such as bridge painting projects.

II. Passenger Rail

Birmingham is home to the only long-distance Amtrak service in Alabama, and it runs on Norfolk Southern Tracks. Birmingham is centrally located to major markets in the southeast and would like position itself in the future as a regionally significant hub of passenger rail service. Doing that requires cooperation with the freight railroads. Therefore, as conditions of the merger the City requests the following:

1. That, if the merger is approved, the STB enforce an 80% on-time performance rate for the Cresent and set a goal of 90% on-time performance rate for the Crescent by the end of the STB review period.
2. Going forward, when the opportunity arises for additional service from Birmingham to new and established southeastern destination cities that requires use of UP tracks, we ask that UP commit to being a partner with the City in realizing those new service opportunities. And if such opportunity occurs within the post-merger review period, we ask this be enforced by the STB.

III. Economic Competitiveness

Birmingham is the Easternmost Gateway City where east and west railroads touch. As such, the City has direct rail access to almost all of the deep-water ports in the lower 48 states. Currently cities like Atlanta and Charlotte or Nashville do not have the same access to the western US ports. This gives Birmingham an advantage in recruiting industrial development. If the merger is approved, it would create a true transcontinental railroad and would give Atlanta and Charlotte direct access to those western markets. Therefore, as conditions of the merger the city is requesting:

1. If the Merger is approved, the STB shall cause an extension of the Merdian Speedway Joint venture concept from Meridian, MS to Brimingham where it would be allowed to interchange with the WATCO Owned Birmingham Terminal Railroad. This joint venture would be inclusive of the McCalla intermodal facility, until such

710 North 20th Street
Birmingham, AL 35203
(205) 254-2771

time that CPKC builds its own intermodal facility in the Brimingham area or UP buys out CPKC for its share.

2. If the Merger is approved, the STB shall cause an interchange agreement between UP and CSX that for any trips between a UP serviced destination and a CSX sole services market in the southeast, the cargo transfer will occur in Birmingham. Despite being a transcontinental network there are several large markets in the southeast that are almost exclusively Class I serviced by CSX that UP would not have direct access to. These include among others key locations Nashville, Tampa, Orlando, Ft. Lauderdale, and Miami. The City of Birmingham would request that interchanging to occur in Birmingham.
3. If the merger is approved, we are asking that the STB condition that no families be relocated out of Birmingham during the review period, unless the job is deemed critical. Additionally, we ask that the STB not permit this merger to be used as justification for job relocations after the end of the STB review period. NS has almost 1000 employees in the Birmingham region.
4. Birmingham is the Gulf Coast Region Headquarters for NS. If the merger is approved, we are asking that STB condition that HQ for all UP Gulf coast region operations remain in Birmingham.

In conclusion, while the City of Birmingham is not currently opposing the merger between Union Pacific and Norfolk Southern, we do have serious local concerns that we request be noted and remedied if this merger is to be approved.

While the City reserves its right to oppose the merger later in the review process, the requested concessions outlined in this letter, if included by the STB as conditions of the merger, would satisfy the City of Birmingham's concerns. These conditions would protect both the health and wellbeing of our resident and our competitiveness in the region, while continuing our partnership with the railroads that also call our city home.

If any further information is requested from the Board, I am happy to make myself available.

Sincerely,

Randall L. Woodfin
Mayor
City of Birmingham

City of Birmingham
Office of Mayor Randall L. Woodfin

710 North 20th Street
Birmingham, AL 35203
(205) 254-2771

CERTIFICATE OF SERVICE

I hereby certify that I have caused copies of the forgoing comments of the City of Birmingham, Alabama to be served by mail or e-mail to all parties of record in this proceeding and via application portal to the Surface Transportation Board.

/s/ Colin Alexander
Colin Alexander
City of Birmingham