MID-OHIO REGIONAL
MORPC
PLANNING COMMISSION

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November 18, 2026
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Public Record

November 18, 2026

The Honorable Patrick J. Fuchs, Chairman

Surface Transportation Board

395 E Street, S.W.

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

Dear Chairman Fuchs and Members of the Board:

On behalf of the Mid-Ohio Regional Planning Commission (MORPC), I respectfully submit these comments on the Revised Application. MORPC offers these comments for the Board's consideration as a regional public agency. MORPC is the regional council of governments and Metropolitan Planning Organization for Central Ohio, serving local governments across a 15-county region of about 2.5 million residents. Our work includes planning for how people and goods move through the region, and the outcome of this proceeding will shape that work for decades.

William Murdock, AICP *Executive Director*
Ben Kessler *Chair*
Laurie Jadwin *Vice Chair*
Matthew Starr *Secretary*

MORPC is not taking a position for or against the transaction. We ask the Board to consider three regional interests as it reviews the record and any conditions it may impose.

Intercity passenger rail. Central Ohio is one of the largest metropolitan regions in the country without intercity passenger rail service. Two corridors serving Columbus, Midwest Connect (Chicago, Fort Wayne, Columbus, Pittsburgh) and 3C+D (Cleveland, Columbus, Dayton, Cincinnati), are in the Federal Railroad Administration's Corridor Identification and Development Program, and portions of these corridors would rely on Norfolk Southern infrastructure: Delaware to Cincinnati, Pittsburgh to Steubenville, and Fort Wayne to Chicago. Within the Central Ohio region, this would specifically be on the segments on the Norfolk Southern Blue Ridge Division serving Delaware, Columbus, and London. We appreciate that the Board directed the Applicants to supplement the record on passenger rail matters. We ask the Board to ensure that the combined carrier's passenger rail commitments extend to corridors in active federal development, not only to existing services, and that the Applicants engage in good faith with corridor sponsors, the State of Ohio, and Amtrak on capacity, access, and host railroad agreements.

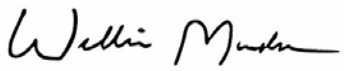
Grade crossings and community effects. Changes in traffic resulting from the transaction could alter train volumes and lengths on lines through Central Ohio communities, with effects on crossing safety, emergency response times, and local travel. We ask that the Board's review account for these effects at the local level, and that the Applicants coordinate with MPOs and local governments where changes in train volumes

are projected. MORPC is available to share regional data with the Board's Office of Environmental Analysis.

Freight service and competitive access. Central Ohio's logistics economy, including the Rickenbacker area, depends on reliable rail service and competitive options for shippers. We ask the Board to give weight to service quality and competitive access for the region's shippers, including how the Applicants' Service Assurance Plan would apply in Central Ohio.

Thank you for the opportunity to comment. MORPC staff are available to the Board as a resource on regional conditions in Central Ohio, and I can be reached at 614-233-4101 or wmurdock@morpc.org.

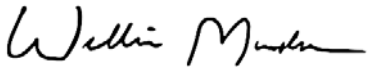
Kind Regards,



William Murdock, AICP

Executive Director

I certify that I have this day served copies of this document upon all parties of record in this proceeding by email, or by mail if an email address was not provided.



November 18, 2026

William Murdock, AICP

Date

Executive Director

Mid-Ohio Regional Planning Commission