



Mayor Lisa Brown

September 20, 2026

VIA ELECTRONIC FILING

Attn: Dir. Danielle Gosselin
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, DC 20423-0001

RE: Environmental Impact Statement Comments, Docket No. FD 36873

Dear Ms. Gosselin:

The City of Spokane is proud of its railroad heritage dating back to 1883, when the Northern Pacific Railway first connected our city to the Eastern United States by rail. Today the rail industry, including Union Pacific, continues to provide jobs and economic vitality to our region.

However, Spokane has environmental impact concerns related to the increased rail traffic that will result from a proposed merger of Union Pacific (UP) and Norfolk Southern (NS) rail operations. According to STB's Union Pacific Acquisition of Norfolk Southern Data Explorer site, activity at the intermodal/auto ramp facility that is immediately east of the City of Spokane is projected to increase by 25%, exceeding the board's threshold for environmental review. The EIS needs to be adequately scoped to consider the impacts to our community. Anticipated impacts include:

Safety and delay issues resulting from blockage of at-grade crossings

UP trains regularly block Waterworks Way creating potential impacts for safety (see attached addendum). Waterworks Way provides access to the City's Upriver Dam facility and the Spokane Police Academy. Safety and accessibility of the dam are a concern for the Federal Energy Regulatory Commission (FERC) relicensing process that the dam is now undergoing. Egress for the Spokane Police Academy impacts emergency response situations, such as the recent Spokane Complex Fire where all available police personnel were called to sudden evacuation duty for a fire that eventually destroyed over 500 homes in the city. Other streets routinely blocked with significant average daily traffic (ADT) are Trent (8,200), Mission (20,600 ADT), Havana (6,600 ADT), and Freya (26,500). All present safety response and travel disruption impacts.

A Better Way Starts Here

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Increased truck traffic

While the intermodal/auto ramp facility is just east of Spokane's border, located in the adjacent city of Spokane Valley, several Spokane streets provide primary access to this area. Trent, Freya, Havana, and Broadway all provide access to the facility and will experience greater congestion and maintenance and repair burdens with this merger. One of the prime public benefits that the merger applicants have put forward is an increase in truck-to-rail diversion. Yet our area is projected to see a 25% increase in related truck traffic with no commensurate investment in capital projects.

Hazardous material

Increased UP train and truck traffic will likely increase hazardous materials that pass-through Spokane on Union Pacific trains, including Bakken crude oil. In August of this year Spokane experienced one of the most expensive and destructive wildfires in Washington state history. Preliminary estimates of the Spokane Complex Fire indicate over \$1 billion dollars in damage. This fire was wind-driven and moved extremely fast. An increase of hazardous materials passing through our community combined with increasing wildfire risk creates a volatile mix. The applicants should have merger conditions that require mitigation.

Intercity Passenger Rail and Shared-Corridor Capacity

The EIS needs to address the effect of the merger on passenger rail operations in Eastern Washington, including Amtrak service to Spokane. Future intercity rail operations in Eastern Washington should also be considered. Any negative impact of the merger on passenger train performance should be mitigated.

We are thankful for the opportunity to comment on this very important issue affecting our community.

Sincerely,

A handwritten signature in black ink that reads "Lisa Brown". The signature is written in a cursive, flowing style.

Mayor Lisa Brown

City of Spokane, WA

Purpose

This report summarizes documented Union Pacific train stoppages blocking N. Waterworks Way and evaluates their potential effect on emergency access to and from the Upriver Dam and Spokane Police Department facilities. Spokane Police Department mounted a camera at the railway intersection, to capture train stoppage data for a one-month period (11/18/25 – 12/18/25).

Background

N. Waterworks Way provides primary access to critical city facilities, including the Upriver Dam and the Spokane Police Department training facility. When a train blocks the roadway crossing, normal ingress and egress are unavailable. This can delay emergency responders, prevent personnel from reaching or leaving the facilities, and interfere with evacuation during a rapidly developing incident.

Summary of Findings

Indicator	Result
Total Recorded blockages	32
Cumulative blockage time	14 hours, 1 minute
Average blockage duration	26.3 minutes
Median blockage duration	21.5 minutes
Shortest blockage	9 minutes
Longest blockage	1 hour, 28 minutes
Blockages lasting 20 minutes or longer	19 (59%)
Blockages lasting 30 minutes or longer	7 (22%)
Blockages lasting 45 minutes or longer	4 (13%)
Blockages lasting 1 hour or longer	2 (6%)

Duration Distribution

Blockage Duration Time	Number of Incidents	Percentage of Total
15 minutes or less	8	25%
16–30 minutes	17	53%

31–45 minutes	3	9%
46–60 minutes	2	6%
60+ minutes	2	6%
Total	32	100%

Analysis

The recorded events demonstrate that UP railroad blockages at N. Waterworks Way are recurring and sustained. Across the 32 documented events, the roadway was inaccessible for a cumulative 14 hours and 1 minute.

The median blockage was approximately 22 minutes, meaning half of the observed events lasted longer than 21.5 minutes. This indicates that the overall results are not driven solely by a few unusually long incidents; a blockage lasting approximately 20 minutes or longer is typical within the dataset.

The average duration was approximately 26 minutes. This figure is higher than the median because of several extended events, including blockages lasting 40, 46, 56, 72, and 88 minutes.

More than half of all documented blockages lasted between 16 and 30 minutes. Nearly 60% lasted at least 20 minutes, and more than one in five lasted 30 minutes or longer. Two events exceeded one hour.

All but two incidents were trains traveling eastbound.

Public-Safety Implications

The data indicates that the railroad crossing presents more than a routine transportation delay. It creates a reliability problem for the primary route serving critical city facilities. Because blockages are unpredictable and commonly last 20–30 minutes, the route cannot be relied upon to provide continuous emergency access.

The primary operational concerns are:

- Delayed ingress by police, fire, emergency medical, utility, or other response personnel
- Delayed evacuation or egress from the Upriver Dam and SPD facilities
- Restricted access during a security, infrastructure, wildfire, medical, or other rapidly developing emergency
- Increased risk if a railroad blockage occurs at the same time as an incident requiring immediate access
- Dependence on a single primary access route without an immediately available alternative