



September 18, 2026

Danielle Gosselin, Director
Office of Environmental Analysis
Surface Transportation Board (Docket No. FD 36873)
395 E Street SW
Washington, DC 20423

**RE: Docket No. FD 36873
Union Pacific Corporation and Union Pacific Company – Control – Norfolk
Southern Corporation and Norfolk Southern Railway Company; Preliminary
Consultation**

Dear Ms. Gosselin:

The City of Arlington, Texas appreciates the opportunity to submit comments on environmental issues and/or concerns associated with the proposed merger of Union Pacific (UP) and Norfolk Southern (NS). Please note that the City intends to separately submit comments on the overall docket on this proposed merger.

Arlington is a city of 394,000 residents located in the heart of the Dallas-Fort Worth Metropolitan Area. One of UP's primary east-west rail lines bisects our community, running past residential and commercial neighborhoods. Its path across Arlington takes it past our Entertainment District (AT&T Stadium, Globe Life Field, National Medal of Honor Museum, and Six Flags Over Texas) and through the core of Downtown Arlington, immediately in front of City Hall and our Downtown Library, the latter of which is outfitted with special glass to minimize the impacts of train noise.

The UP line through Arlington sees dozens of trains per day, many of them of considerable length. Due to the numerous grade crossings, this train traffic has major impacts on our community. UP has grade crossings in Arlington at:

1. Great Southwest Parkway, next to a major industrial park,
2. Stadium Drive, a primary vehicle and pedestrian access road to AT&T Stadium and Globe Life Field,
3. Collins Street at the eastern gateway to Downtown Arlington as well as a primary vehicle and pedestrian access road to the Entertainment District,
4. Mesquite Street and Center Street, in an area of Downtown with heavy vehicle and pedestrian traffic immediately next to city hall and the central library,
5. Cooper Street, a major thoroughfare at the western gateway to Downtown Arlington that sees considerable pedestrian traffic from students at the University of Texas at Arlington (41,000 students) and Arlington High School (2,700 students), and which is near the North Police Substation and Fire Station No. 1, and
6. Bowen Road, near many businesses, a neighborhood, and a City park.

At the broadest level, the City urges the Board (in both the environmental analysis and in the overall evaluation of the merger) to conduct a comprehensive review and analysis of the proposed merger that addresses all its potential impacts on the communities that host UP and NS infrastructure. Should the Board eventually approve this merger, the City urges the Board to identify concrete and enforceable mitigation measures to address negative impacts identified by the Board's review and analysis.

Impacts that Arlington urges the Board to review and analyze include but are not limited to air quality, noise, mobility, safety, and emergency response operations and response times. The City also requests that the Board evaluate the transportation of hazardous waste by the proposed merged railroad and its potential impact on communities, including strong community right to know provisions that allow local officials and first responders to prepare for potential incidents.

The City is particularly concerned about the impacts of the proposed merger on the grade crossings in central Arlington, where there is heavy vehicle and pedestrian traffic, and in the Entertainment District, where the grade crossing can block the primary egress and ingress into major events. The City has worked collaboratively with UP to mitigate the impact of grade crossings on our community's safety, mobility, and quality of life, and we expect to continue to do so should the Board approve the proposed merger. However, it is paramount that the Board conduct a thorough review and analysis and ensure that Arlington and other communities have the tools to mitigate any negative impacts of the merger should the Board approve it.

Please let me know if you have any questions or would like additional information about how this merger might impact the City of Arlington.

Sincerely,

A handwritten signature in black ink, appearing to read 'Trey Yelverton', with a stylized flourish at the end.

Trey Yelverton
City Manager