



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

September 16, 2025

Thomas R. Brugato
Covington & Burling LLP
850 Tenth Street, N.W.
Washington, DC 20001

By email at tbrugato@cov.com and pwhitfield@sidley.com

RE: Docket No. FD 36873, Union Pacific Corporation and Union Pacific Railroad Company – Control – Norfolk Southern Corporation and Norfolk Southern Railway Company; Information Request No. 1

Dear Mr. Brugato:

Consistent with 49 C.F.R. § 1105.7(f), the Surface Transportation Board’s (Board) Office of Environmental Analysis requests the information below, which is needed to support the environmental review in connection with the above-referenced proceeding.

- A. Provide the following information where transaction-related traffic would exceed the Board’s thresholds at 49 C.F.R. § 1105.7(e)(5) (traffic levels shall be based on projections five years after the date of the anticipated year of the issuance of a final decision from the Board):¹
1. Identify and map by state and milepost endpoints, each rail line segment that would experience an increase in transaction-related rail traffic of at least 100 percent (as measured in gross ton miles annually) or an increase of at least eight or more trains per day, in areas designated as being in attainment for the primary air pollutants regulated under the Clean Air Act (“attainment areas”). For each rail segment, specify the number of existing trains per day (or gross ton miles annually) and the number of new transaction-related trains per day (or gross ton miles annually);
 2. Identify and map by state and milepost endpoints, each rail line segment that would experience an increase in transaction-related rail traffic of at least 50 percent (as measured in gross ton miles annually) or an increase of at least three or more trains per day in areas designated as a Class I area or being in

¹ For example, if UP files its application in 2025, then the Board’s final decision would likely be issued in 2026. Therefore, the forecast year for transaction-related rail traffic should be 2031.

nonattainment for one or more of the primary air pollutants regulated under the Clean Air Act (“nonattainment areas”). For each rail segment, specify the number of existing trains per day (or gross ton miles annually) and the number of new transaction-related trains per day (or gross ton miles annually);

3. Identify and map by state and community, each rail yard that would experience transaction-related increases in rail yard activity of at least 100 percent (measured by carload activity) or 20 percent (measured by carload activity) in attainment or nonattainment areas, respectively. For each identified rail yard, specify the existing carload activity and new transaction-related carload activity; and
 4. Identify and map by state and community, each intermodal facility that would experience a transaction-related average increase in truck traffic of more than 10 percent of the average daily traffic or 50 vehicles a day, or both. For each identified intermodal facility, specify the existing truck traffic and new transaction-related truck traffic.
- B. Identify and map by state and community, any transaction-related rail construction that would require Board authorization under 49 U.S.C. § 10901, including the length and endpoints of each proposed rail line.
 - C. Identify and map by state, community, length, and milepost endpoints, any transaction-related rail line abandonments.
 - D. For rail segments on which transaction-related rail traffic would exceed the Board’s thresholds, and on which passenger rail traffic currently moves, identify and map by state and community, the number of passenger trains per day that currently move on each specified rail segment.
 - E. Identify and map by state and community, new transaction-related passenger rail traffic including trains per day and milepost endpoints of the new transaction-related passenger rail traffic. For each rail segment that would experience new transaction-related passenger rail traffic, specify the total number of freight trains (existing and new transaction-related) that would run on that same rail segment.
 - F. For transaction-related new rail traffic, identify and map by state and rail segments, any hazardous materials that would be moved. Furthermore, specify whether these commodities would move as components of larger trains or would move in unit train formations. In general terms, also identify the other commodities that would move with any transaction-related traffic.
 - G. Under the proposed transaction, for each rail line segment, rail yard, or intermodal facility that would exceed the thresholds listed in Item A, provide the following information as applicable:

1. Numbers, locations, and mileposts of existing and proposed public roadway/rail at-grade crossings; and
2. Maps, locations, and milepost endpoints of any existing quiet zones.

Please provide your response as soon as possible. If you have any questions, feel free to contact Elizabeth Webster of my staff at 202-360-0742 or by email at Elizabeth.Webster@stb.gov. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Danielle Gosselin".

Danielle Gosselin
Director
Office of Environmental Analysis