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EI-34236

May 4, 2026

Ms. Danielle Gosselin
Director, Office of Environmental Assessment
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423

Re: STB Docket No. FD 36854, Union Pacific Railroad – Construction and Operation Exemption-
In Matagorda County, Texas; Request for Reclassification

Dear Ms. Gosselin:

Pursuant to 49 C.F.R. § 1105.6(d), I am requesting on behalf Union Pacific Railroad Company ("Union Pacific"), petitioner in the above-captioned proceeding, to request that the Surface Transportation Board ("Board") waive the requirement of 49 C.F.R. §1105.6(a) of the preparation of an Environmental Impact Statement (EIS) in favor of the preparation of an Environmental Assessment (EA). Union Pacific submits that reclassification is appropriate because of the proposed construction of the Wadsworth Industrial Lead is not likely to have a significant environmental impact such that a waiver under 49 C.F.R. § 1105.6(a) and the preparation of an EA will be sufficient to address the impacts of the proposed construction. In support of this request, Union Pacific Railroad submits the following information in accordance with §1105.6(b)(1) and §1105.7(e).

Background

On September 24, 2025, Union Pacific filed with the Board a Petition to Construct and Operate a new industrial lead rail line in Matagorda County, Texas. Union Pacific has continued discussions with the Office of Environmental Analysis ("OEA") over the last several months. Currently, Union Pacific serves customers in Bay City, Texas (just south is Wadsworth, Texas) off Union Pacific's Angleton Subdivision. The proposed line will construct and operate approximately five miles of rail line ("Line") in south Matagorda County, near Wadsworth. The project will strengthen LyondellBasell's position in the region by providing it with a second competitive rail option. The proposed Line will also provide long-term benefits to the local economy by making Matagorda County more attractive to future industrial investments along the Line.

Union Pacific plans to connect the proposed Line to its network via exiting track referred to as the Celanese Industrial Lead and the Cities Services Track. The purpose of Union Pacific's construction is to

provide LyondellBasell with competitive access on the proposed Wadsworth Industrial Lead. The proposed Wadsworth Industrial Lead will include a five-mile extension from the current Cities Services industrial lead to LyondellBasell's Wadsworth, TX location. In addition to granting access to LyondellBasell, it could also provide future rail development opportunities as the lead cuts through a few miles of acreage with potential for development.

On May 2, 2025, OEA approved a waiver of the six-month pre-filing notice otherwise required under 49 C.F.R. § 1105.10(a)(1), and separately on July 14, 2025, approved the selection of Parametrix as the third-party contractor to assist with the preparation of the environmental documentation and review. Currently, the environmental documentation and review process is ongoing. OEA staff and Parametrix performed preliminary investigations, with onsite inspection on April 7, 2026. Parametrix, as directed by OEA staff, prepared and sent out environmental notification letters to local, state, and federal agencies. Based on the feedback received from OEA to date and UP's understanding of the natural resources with the project footprint, Union Pacific does not believe there will be a significant environmental impact; and therefore, Union Pacific is submitting this request that the OEA prepare an EA instead of an EIS.

Union Pacific's Proposal Not Likely to Have Significant Impact on the Environment

Under 49 C.F.R. § 1105.6(a), an EIS "will normally be prepared for rail construction proposals." However, 49 C.F.R. § 1105.6(d) provides that an applicant can request that the Board instead evaluate a project through an EA, rather than an EIS, if the applicant demonstrates that a proposal is not likely to have a significant environmental impact. Further, under 49 C.F.R. § 1105.6(d), "any request for reclassification must be in writing and, in a rail construction, should be presented with a prefilling notice required by 49 C.F.R. § 1105.10(a)(1) (or request to waive that prefilling notice period)." Pursuant to 49 C.F.R. § 1105.10(c), on May 2, 2025, OEA granted Union Pacific's request for waiver of the six-month prefilling notice generally required for rail construction projects.

The Wadsworth project site is an extension to provide additional industrial opportunities in a growing area. The Wadsworth project will result in a second railroad providing service to LyondellBasell, as well as potentially new customers locating on the Line extension, creating a reduction in energy use for train operations versus trucking.

Union Pacific anticipates traffic to be limited to 2 trips per day, 7 days per week once the Wadsworth project is operational and therefore does not expect that traffic handled over the Wadsworth project will exceed the threshold of eight (8) trips per day for an attainment area as per 49 C.F.R. § 1105.7(e)(5)(i)(A).

Anticipated traffic volume can be expected to lead to a corresponding increase in noise levels. However, the Wadsworth project is situated in an agricultural landscape and as such it is not anticipated that the Wadsworth projects will impact sensitive noise receptors.

Union Pacific does not believe that the Wadsworth project is likely to adversely affect endangered or threatened species or areas designated as critical habitat.

Union Pacific understands that a small portion of the property is in a Zone AE floodplain and that wetlands do not appear to be impacted by the Wadsworth project. Union Pacific is prepared to mitigate or design the project to address the concerns that arise related to the Wadsworth project.

Union Pacific is not aware of historic or cultural resources that may be impacted by the Wadsworth project and will work with OEA and the Texas State Historic Preservation Office to identify any potential impacts. Union Pacific is prepared to mitigate or design the project to address any concerns that arise related to the Wadsworth project.

UPRR does not believe that an environmental impact statement will be necessary because the environmental conditions of this property are known and the impacts of the Wadsworth project are negligible based on the information above. Accordingly, Union Pacific respectfully requests OEA to waive the requirement of 49 C.F.R. §1105.6(a), Preparation of an Environmental Impact Statement (EIS), in favor of the preparation of an Environmental Assessment (EA).

Sincerely,



Tanya Spratt
Senior General Attorney - Law