



ST. TAMMANY PARISH

MICHAEL B. COOPER
PARISH PRESIDENT

September 16, 2026

Elizabeth Webster Via Email
Surface Transportation Board (Docket No. DFD 36873)
395 E. Street SW
Washington, DC 20423
www.stb.gov

Comments will be submitted via email to: www.stb.gov

RE: UP-NS Merger EIS

Docket No. FD 36873 Union Pacific Acquisition of Norfolk Southern Railway Company
St. Tammany Parish, LA Preliminary Environmental Analysis Comments 09/21/2026

Dear Ms. Webster,

We in St. Tammany Parish appreciate the incredible talent, time and volume of work that the Office of Environmental Affairs (OEA) has invested in this enormous project, in order to produce documentation for the proposed merger of Union Pacific Railroad Company (UP) and Norfolk Southern Railway Company (NS) to create the country's first transcontinental railroad. We also appreciate the opportunity to review the merger materials and present Parish concerns and those of the affected municipalities, City of Slidell and the Town of Pearl River.

Should you have any questions or wish to discuss this matter further, please do not hesitate to contact me at (985) 966-2024.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael B. Cooper", is written over the printed name.

MICHAEL B. COOPER
St. Tammany Parish

Cc: Ms. Gina Hayes, Chief Administrative Officer, St. Tammany Parish Government
Mr. Ross Liner, AICP, CFM, Director, Planning & Development, St. Tammany Parish Government
Dr. E. deEtte Smythe, Regulatory Manager, St. Tammany Parish
Ms. Sabrina Schenk, Local Coastal Program Manager, St. Tammany Parish
Mr. Daniel Hill, P.E., Director, Department of Engineering, St. Tammany Parish
Mr. Theodore Reynolds, P.E., Asst. Director, Department of Engineering, St. Tammany Parish
Ms. Holly O'Neal, P.E., Asst. Director, Department of Public Works, St. Tammany Parish
Ms. Amy Ybarzabal, Legislative Liaison, St. Tammany Parish
Ms. Mary Burckell, Council Administrator, St. Tammany Parish
United States Congressman Steve Scalise, 1st District of Louisiana
United States Senator Bill Cassidy, Louisiana
United States Senator John Kennedy, Louisiana
State Senator Bob Owen, District 1, sen01@legis.la.gov
State Representative Brian Glorioso, District 90, hse090@legis.la.gov
Mayor Randy Fandal, City of Slidell
Mayor Joe Lee, Town of Pearl River

*Enclosures: St. Tammany Parish, LA Preliminary Environmental Analysis Comments to the UP-
NS Merger
Docket No. FD 36873 Union Pacific Acquisition of Norfolk Southern Railway
Company*

At the request of Ms. Danielle Gosselin, Director, Office of Environmental Analysis, Surface Transportation Board¹, St. Tammany Parish was given the opportunity to evaluate potential environmental impacts of the merger, utilizing materials provided on the UP-NS website regarding Docket No. FD 36873 Union Pacific Acquisition of Norfolk Southern Railway Company. This merger will create the country's first transcontinental railroad.

Excerpts from the 8/19/2026 letter (below) describe the review justification and parameters:

The Transaction would involve: (1) changes in operations (e.g., an increase in average trains per day) on certain segments of the combined rail network that would exceed the Board's thresholds for environmental review, (2) changes in activity at some rail yards and intermodal facilities that would exceed the Board's thresholds for environmental analysis, and (3) capital improvements to increase capacity along the UP and NS mainlines and expand UP and NS yards and intermodal facilities.

To support increased rail traffic on the combined network, Applicants are proposing capital improvements along the UP and NS mainlines and expansions of the footprints at some yards and intermodal facilities as part of the Transaction. These transaction-related capital improvements would take place in Alabama, Arizona, Arkansas, California, Florida, Georgia, Illinois, Indiana, Iowa, Kansas, Louisiana, Mississippi, Missouri, New Mexico, Ohio, Tennessee, and Texas. The EIS will analyze potential impacts to the environment and cultural resources from the proposed capital improvement projects, as appropriate.

Of particular interest to residents of St. Tammany Parish, LA, NS RR Segment 10163 runs from New Orleans through St. Tammany Parish to Meridian, MS.

To support the review by St. Tammany Parish, resources included:

- UP-NS Merger website:
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- St. Tammany Parish Multi-Modal plan
- St. Tammany Parish Slidell Levee System
- FEMA Flood Maps
- STP GIS records of elevations and Rights-of-Way

¹ Consultation Request - Docket No. FD 36873 Union Pacific Acquisition of Norfolk Southern Railway Company, Danielle Gosselin, Director, Office of Environmental Analysis, Surface Transportation Board, email and letter 8/19/2026.



Planned Capital Improvements: Culvert and Siding Extensions, New Drainage Features

Culvert extensions, siding extensions and new drainage features are planned for the Pearl River area along Segment 10163. This may become a concern for Pearl River residents as much of the area is in FEMA-designated flood zone A with some Repetitive Loss homes in the area.

- Increasing impervious surfaces (siding extension), cross-drainage volume or direction (new culverts and extensions) may exacerbate flooding in these vulnerable areas.

Planned Capital Improvements Locations ▾

Capital Improvement Project

Pearl River New Siding

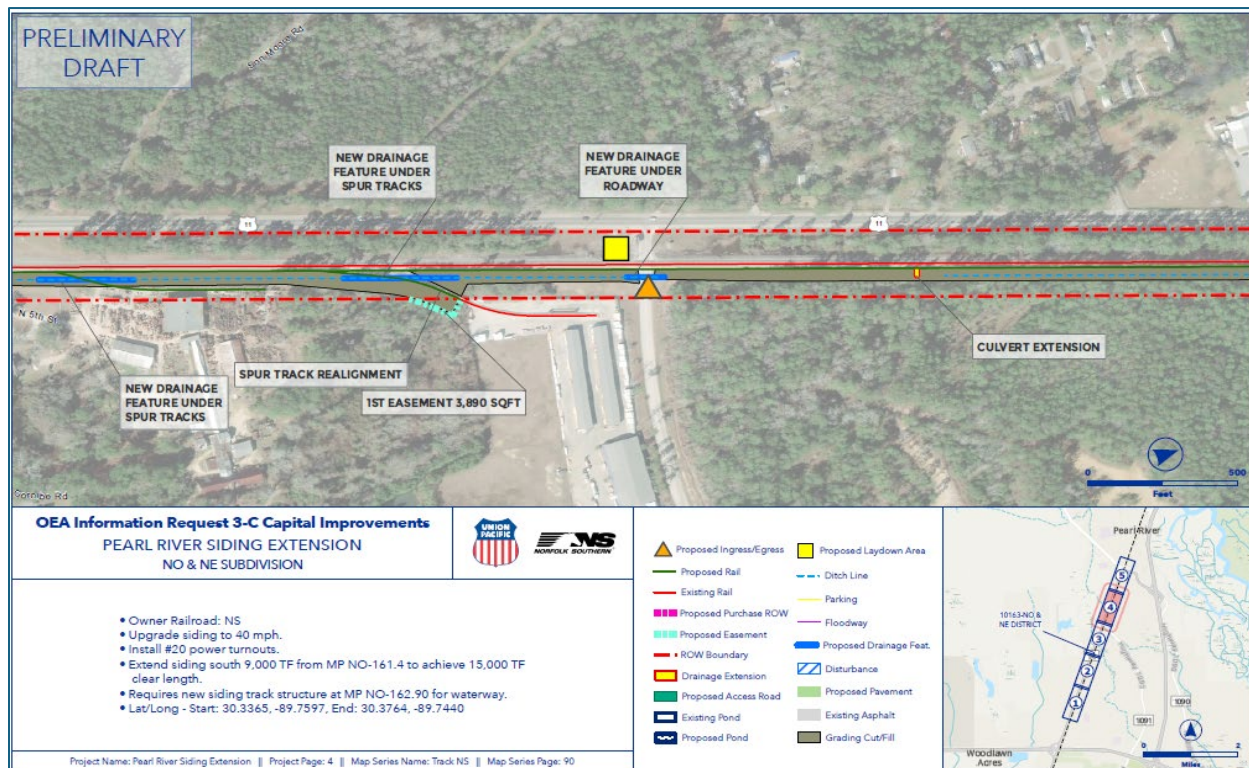
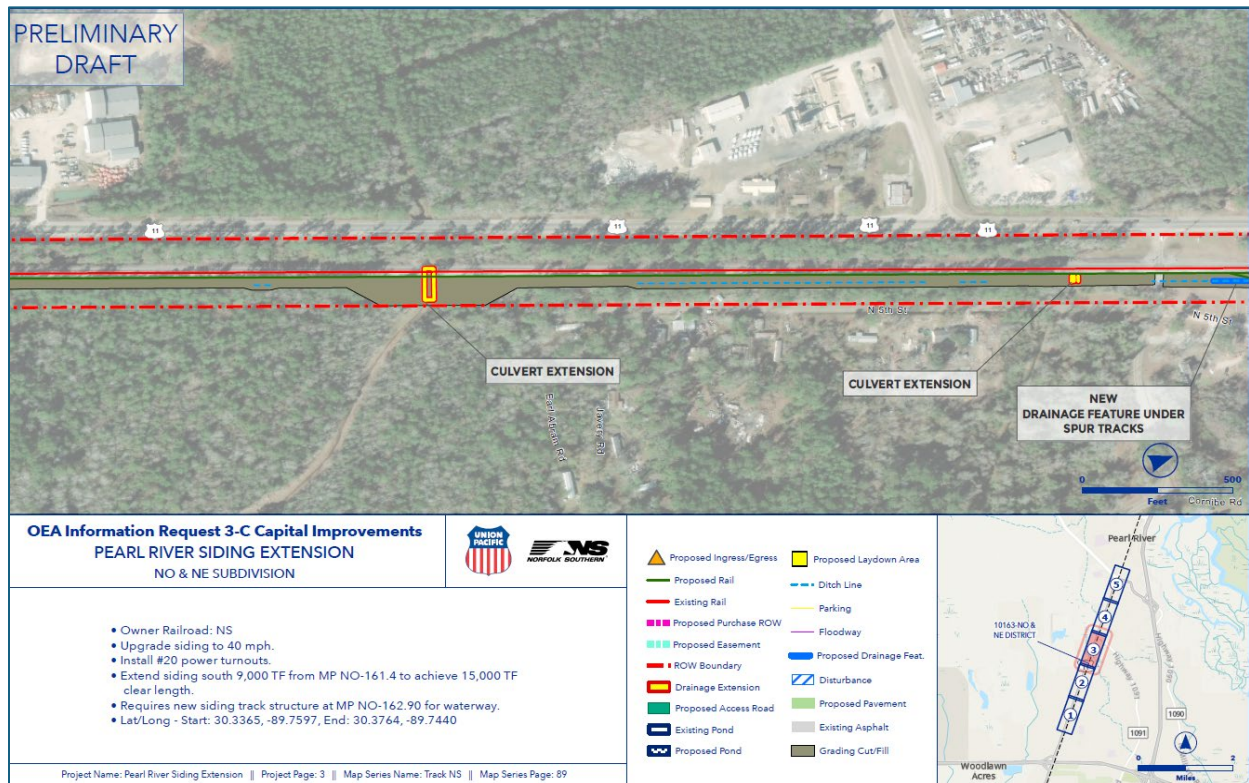
Applicants plan to construct a new siding (south of the existing siding at Pearl River) to a clear length of 14,000 feet. The project will include constructing 3.0 miles of new siding track, able to accommodate speeds of 40 mph with #20 turnouts. This segment of track will also be upgraded to CTC. Applicants estimate this project will cost \$19.4 million and be completed by the end of Year 3.

UP-NS Merger EIS

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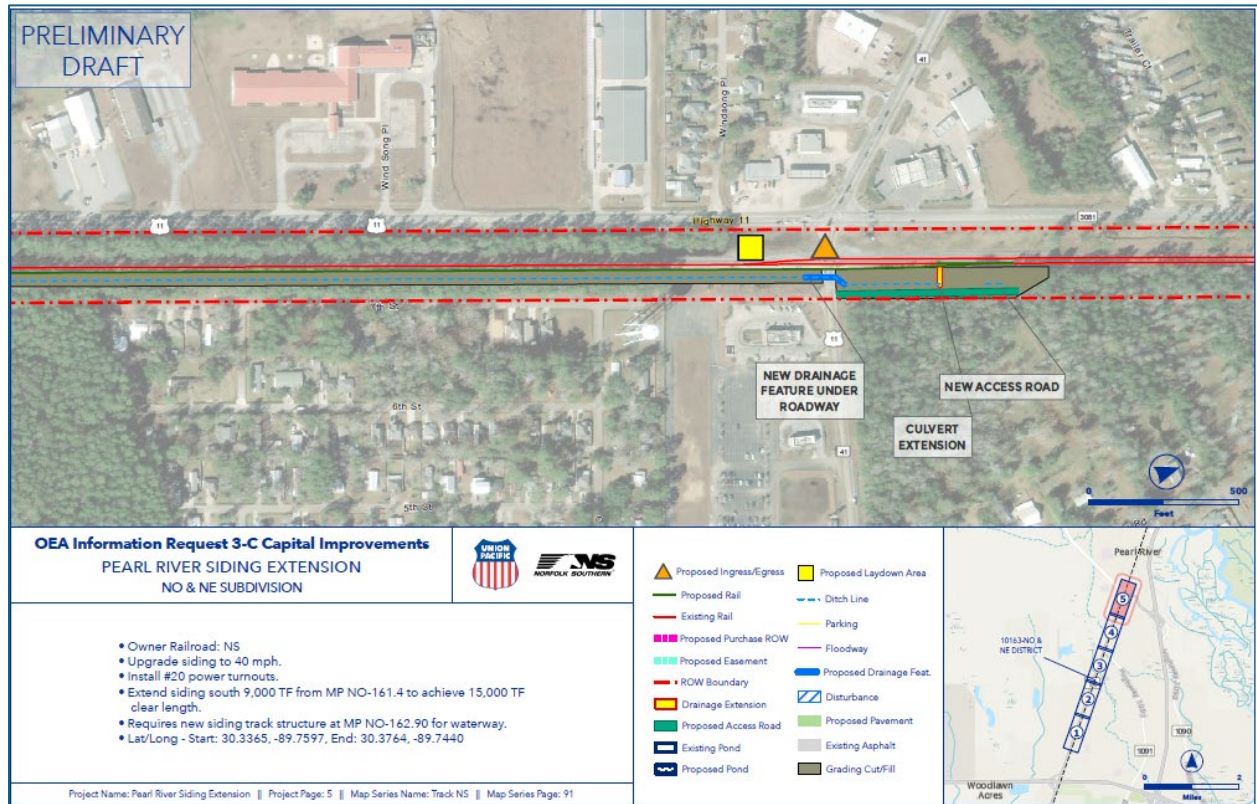
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Hazardous Materials

In its May 8, 2026, letter to Thomas R. Brugato, the Surface Transportation Board requested additional information about Hazardous Materials (for which no response is available on items #1 & #2 on the UP-NS Merger website):

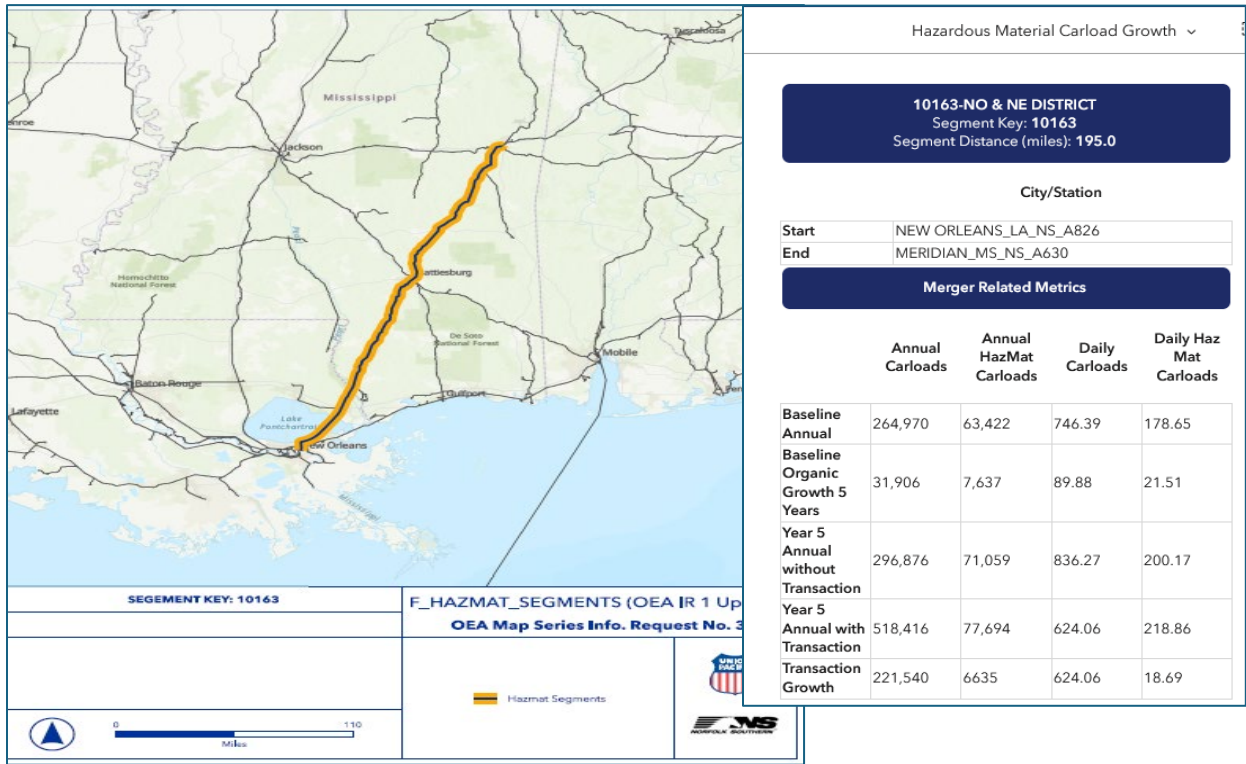
D. Hazardous Materials

1. Provide a summary of the types of hazardous materials transported on the UP and NS networks pre-acquisition and to be transported on the combined network post-acquisition.
2. Provide NS and UP records of hazardous materials releases and derailments and accident/incident frequencies for the years 2021 through 2025.
3. For all rail yards that would experience transaction-related increases in rail yard activity of at least one hazmat carload processed per day, provide the following information with and without the proposed transaction. The information requested can be provided using the table format shown in the template in Attachment 2.
 - i. Baseline hazmat carloads processed per day
 - ii. Year 5 No Transaction hazmat carloads processed per day (including organic growth)
 - iii. Year 5 With Transaction hazmat carloads processed per day
 - iv. Difference (Year 5 With Transaction – Year 5 No Transaction)

A simple internet search provided three recent N-S derailments that caused environmental contamination and/or concern:

Norfolk Southern has faced major scrutiny and legal actions over high-profile hazardous material releases and derailments

- **East Palestine, Ohio (February 3, 2023):**
 - A [National Transportation Safety Board \(NTSB\) Accident Report](#) details how 11 tank cars carrying hazardous materials derailed.
 - Three cars suffered mechanical breaches releasing flammable/combustible liquids, and five others released flammable gases due to fire exposure and a deliberate controlled burn.
 - Federal records and investigations revealed ongoing health concerns, environmental contamination, and subsequent Department of Justice and EPA complaints under the Clean Water Act and CERCLA.
- **Morgan County (June 11, 2026):**
 - A Norfolk Southern train derailment breached an ethanol tank car, releasing roughly 107,000 gallons of alcohol that ignited and burned for days, impacting local water and wildlife.
- **Jasper, Alabama (September 2026):**
 - A minor derailment caused a locomotive to roll onto its side, spilling diesel fuel and engine oil, though authorities reported no hazardous material release from the cargo cars.



The merger proposes to increase the loads of hazardous materials along Segment 10163 that runs from New Orleans through St. Tammany Parish to Meridian, MS.

- St. Tammany Parish is concerned about these recent safety issues with the NS RR because the Segment passes through densely populated areas in the Cities of Slidell and Pearl River.

Slidell Levee System Alignment

NS RR Segment 10163 traverses the southern end of St. Tammany Parish in Slidell parallel to State Hwy 11. The area is extremely flood prone, with approximate 100-year water surface elevations ranging 15' at the coast to 1-3' inland at US I-12.

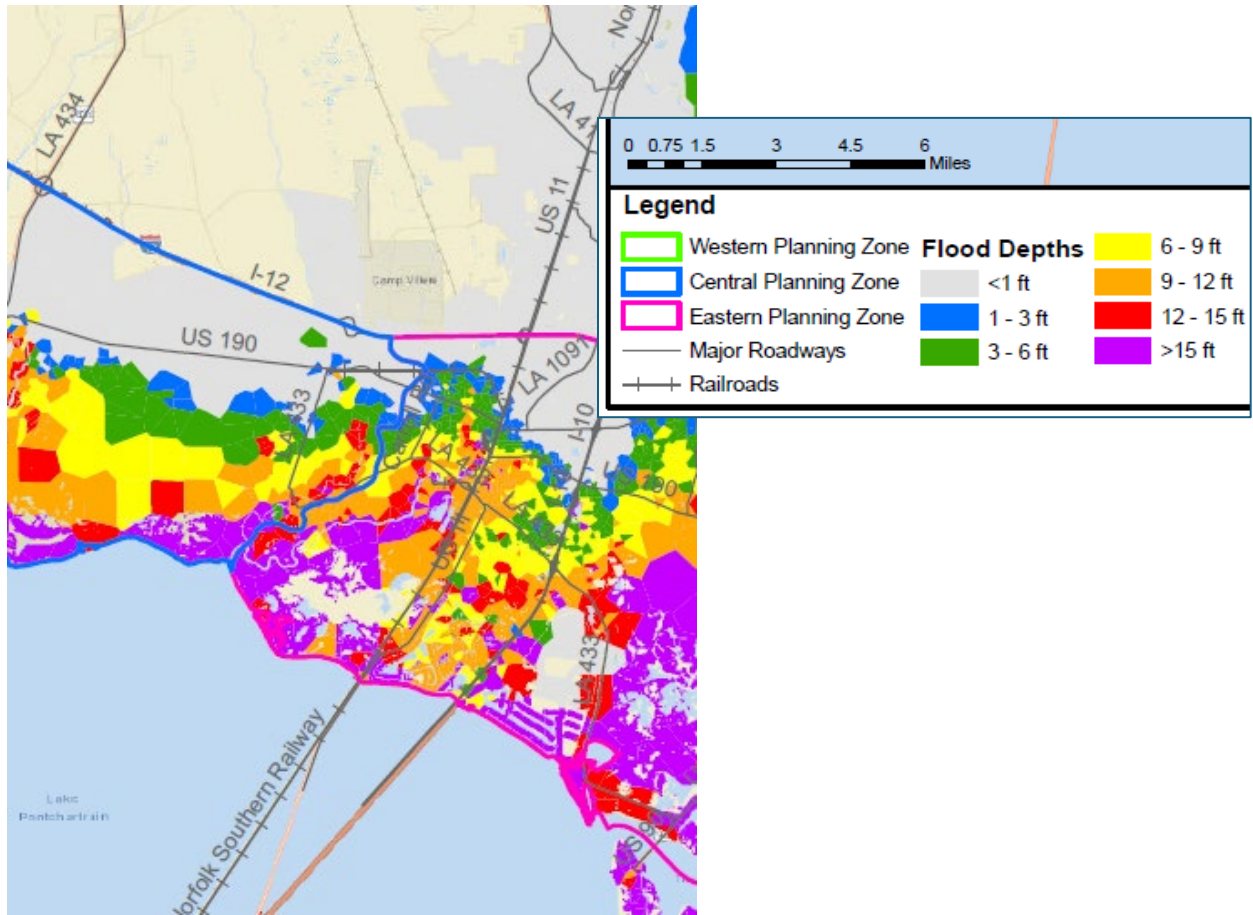
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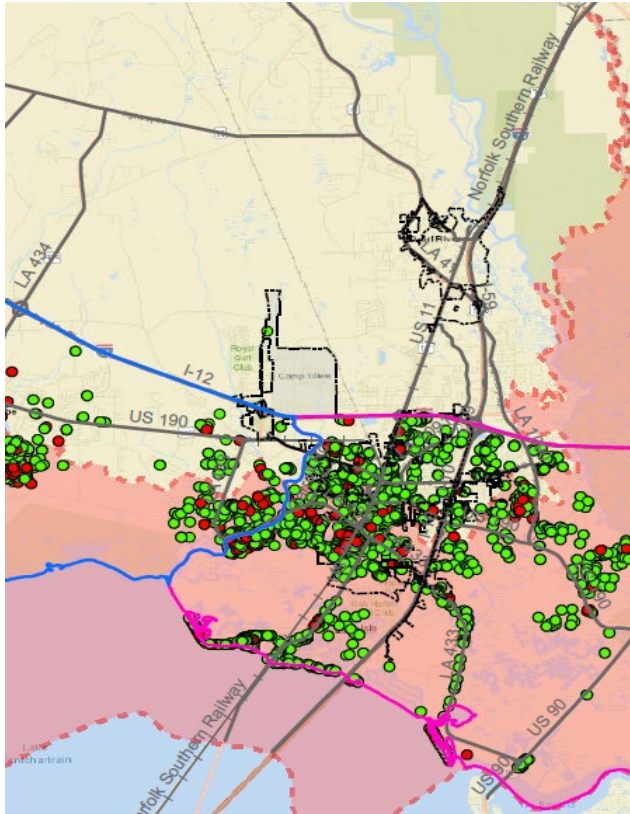
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There are several thousand FEMA-designated Repetitive Loss structures (green dots) in the area surrounding the NS RR in the Slidell area.

To reduce the risk of further flooding in this area, St. Tammany Parish and the LA Coastal Protection Restoration Agency (CPRA)² are constructing a levee system that will protect over 5,000 homes in the Slidell area.

Several of the levee segments will be constructed parallel with the N-S RR along Hwy 11, with the RR being located outside of the levee system. Levee segments will consist of earthen and T-Wall construction. Through the City of Slidell, the levee heights (15'-17') will exceed the RR elevations (Maps and table below).

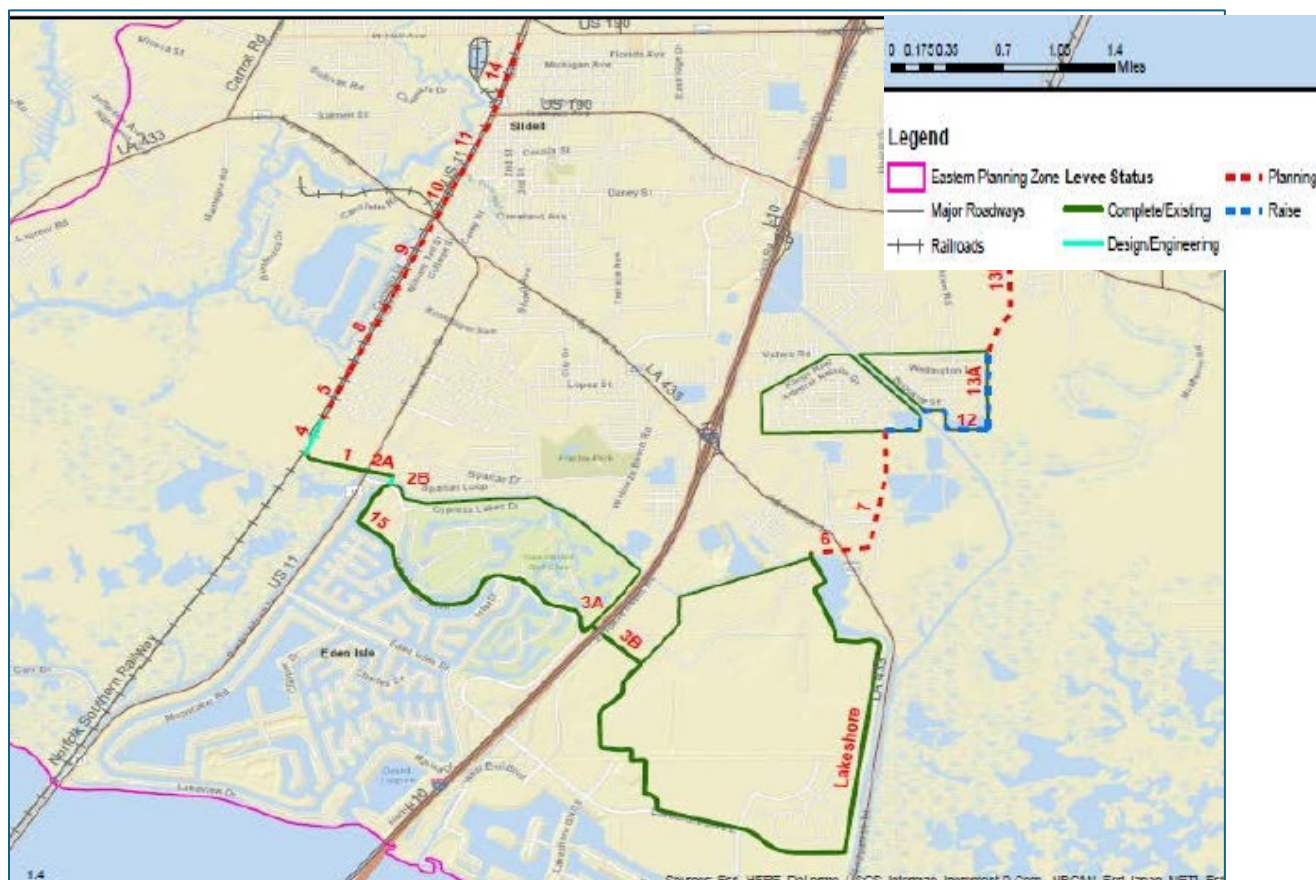
² 2023 LA Coastal Master Plan (CPRA). 2026 WRDA Bill provided some funding for Feasibility & Engineering studies.

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Segment Number	Segment Description	Segment Type	Segment Dimensions		Status [3]
			Length (Linear feet)	Current or Design Elevation (feet)	
1	Raising Highway 11 to NSRR Tracks - Phase 2 (15') - Lift Hwy 11 to Schneider Canal Pump Station	Earthen	1916.70	15.0	Complete. April 2018
02a		Earthen	894.10	15.0	Complete. Constructed to 100 year design height. Will need small pump station over levee to replace culvert to meet USACE Guidelines.
02b	Schneider Canal Pump Station to Oak Harbor Ring Levee (DD#5)	t-Wall across Canal & Pump station	151.60	15.0 [1]	Design complete, waiting on construction funding.
03a	Oak Harbor Ring Levee (DD#5) to I-10	Earthen	161.10	12.5	Complete
03b	I-10 to Lakeshore Estates Ring Levee (DD#2)	Earthen	1462.20	15.5	Complete. Constructed to 100 year design height. Will need small pump station over levee to replace culvert to meet USACE Guidelines
03c	East Howse Beach Road Raising			16.25	Complete. Constructed to 100 year design height.
03d	I-10 Raising			TBD	Have existing centerline elevations. Cost may increase due to possible concrete barrier project LADOTD is proposing.
4	Segment 01 to Baptist Church	Earthen	1298.70	15.25	Designed but must be permitted with segments 5, 8, 9, 10, 11, and 14.
5	Baptist Church to Sun Valley Pump Station	t-Wall	1758.60	15.25	Some preliminary engineering work done. This is to be T-Wall levee.
6	Lakeshore Estates Ring Levee (DD#2) to Hwy 439 (Note: Alignment may change)	Earthen	1758.60	TBD	No work yet.
7	Hwy 439 to Kingspoint Ring Levee (DD#4) (Note: Alignment may change)	Earthen	4626.50	TBD	No work yet.
8	Sun Valley Pump Station to Lizana Street	t-Wall	4626.50	15.25	Some preliminary engineering work done. Approximately 2950 ft long x 10 ft high wall.
9	Lizana Street to Bayou Liberty Road	t-Wall	2728.40	15.25	Some preliminary engineering work done. Approx. 2750 ft long wall x 10 ft high wall. CLECO conflicts.
10	Bayou Liberty Road to south of Bayou Pattasat	t-Wall	1553.40	15.25	Some preliminary engineering work done. Approx. 1500 ft long x 10 ft high wall.
11	Bayou Pattasat to Bayou Lene	t-Wall	2209.40	15.25	Some preliminary engineering work done. Approx. 2250 ft long x 9 ft high wall. CLECO conflicts.
12	Raise portion of Kingspoint Ring Levee (DD#4) & Install Pump Station in W-14 Canal	Earthen	4109.40	17.25	No work yet. A portion of this levee, about 4,000-ft, will need to be raised about 4-ft, PLUS the City of Slidell's City Barn drainage pump station will need to be relocated.
13a	Raise Portion of Existing Kingspoint Ring Levee (DD#4)	Earthen	2575.20	17.25	No work yet. Approx 7500 ft, height varies from Kingspoint levee to high ground just north of Hwy 190 - includes hump in Hwy 190.
13b	Connect new segment to Kingspoint Ring Levee (DD#4) and extend to Hwy 190	Earthen	3990.50	15.25	
14	Bayou Lane to W. Hall Avenue	t-Wall	2814.50	15.25	Some preliminary engineering work done. Earthen & levee wall, approx 2800 long from Bayou Lane/Freemau to East Hall. Utility relocations and work within railroad r/w are complications.
15	Raising Oak Harbor Boulevard (raise road over levee)			17.1	Complete.
16	W-14 Canal Pump Station	Earthen			USACE estimated cost with contingency to be \$31M.
17	Lakeshore levee			18.0	Complete.
			38625.40		
[1] GEC for CPRA (August 2013)					
[2] Constructed but will need to be raised to 100-year protection elevation					
[3] Data from St. Tammany Parish October 2016					

