



September 18, 2026

Elizabeth Webster

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 Comments

Dear Ms. Webster:

Berkshire Regional Planning Commission (BRPC) staff appreciate the opportunity to provide preliminary comments regarding the potential environmental impacts of (1) the acquisition of control by Union Pacific Corporation (UPC) of Norfolk Southern Corporation (NSC), and through NSC of Norfolk Southern (NS) and NS's rail carrier subsidiaries, and (2) the resulting common control by UPC of Union Pacific (UP) and NS and the consolidation of the rail operations of UP and NS (Transaction).

BRPC is the official region-wide planning agency in Berkshire County providing comprehensive planning services to municipalities which include land use, transportation, community and economic development, housing, public health, and environmental planning. BRPC promotes regional collaboration among communities and works to increase coordination between all levels of government.

BRPC's Transportation Planning Program is designated as the staff to the region's Metropolitan Planning Organization (MPO) and is responsible for the planning and programming of all modes of transportation; BRPC recently completed the FY2024-2044 Long-Range Transportation Plan. Two goals of this Plan pertinent to our comments regarding this Transaction are: Increase Safety and Security; and Promote Active Transportation.

It is BRPC's understanding that rail line segments in Massachusetts are among those that could experience changes in operations such as increased rail traffic that would exceed the Surface Transportation Board (Board)'s thresholds for environmental review, specifically air quality. The proposed Transaction includes mileage within rail line segment 11050 that runs between MILLERS FALLS_MA_NS_90048 and HOOSICK JUNCTION_NY_NS_90042 and through the City of North Adams and Town of Williamstown in northern Berkshire County, Massachusetts. BRPC anticipates that the Board's Environmental Impact Statement (EIS) will

analyze the potential environmental impacts of increased rail traffic on air quality along this rail segment and provides the following information regarding resources that may be affected by the Transaction.

The Massachusetts Department of Environmental Protection (MassDEP)'s statewide air monitoring network includes a station in North Adams that has been operating since 2017 and measures fine particles (PM_{2.5}) and Black Carbon for the purpose of population exposure (Site ID 25-003-6001). Additionally, BRPC's Berkshire County Clean Air Project has established a network of indoor and outdoor air sensors throughout the county, including in North Adams and Williamstown, to better understand neighborhood-level air quality and support public health, environmental planning, and community awareness.

According to the Massachusetts Department of Public Health, pediatric asthma rates in North Adams during 2024-25 were 11.4% and during 2025-26 were 9.5%. According to the Massachusetts Health Data Tool, 2024 Electronic Health Record (EHR) data¹, the estimated prevalence of asthma among adults 18 years of age and older in North Adams is 8.99% overall and 10.34% in women. It is highest among adults 65 years of age or older, between 11.41% and 13.72%. For 2023, survey-based data for North Adams adults 18 years of age and older as reported in the U.S. Centers for Disease Control (CDC) PLACES database² shows a higher overall prevalence of asthma at 13.2%, the highest reported rate in Berkshire County and as high as 13.7% for North Adams Census Tract 25003921300.

In Williamstown, the estimated prevalence of asthma among adults 18 years of age and older per 2024 EHR data is 8.21% overall, 9.44% for women, and between 9.9% and 13.7% among adults 65 years of age or older. Per 2023 PLACES survey data, the estimated prevalence is 11.8%.

BRPC anticipates that the Board's EIS will analyze not only the potential for air quality impacts on sensitive populations due to increased rail traffic but also emission reductions due to implementation of UP's 2022 Climate Action Plan as potentially offsetting these impacts. That Plan states that UP's "major focus in reducing our carbon footprint is on our locomotive operations" and that UP is committed to reduce absolute Scope 1 and 2 GHG emissions and GHG emissions on a well-to-wheel basis from locomotive operations 26% by 2030 from a 2018 baseline. Reducing local air pollution is among the Policies & People strategies described in the 2023 Massachusetts Freight Plan. Through the EIS process, BRPC looks forward to learning more about the mix of decarbonization and fuel efficiency initiatives that UP plans to employ in rail line segment 11050. As described in UP's 2022 Climate Action Plan, these could include

¹ Massachusetts Department of Public Health (MDPH) uses Electronic Health Records (EHR) from MDPHnet. MDPHnet is a distributed surveillance network that includes EHR data from 20% of the Massachusetts state population.

² PLACES provides model-based estimates based on data from the Behavioral Risk Factor Surveillance System (BRFSS), Census decennial population counts and annual county population estimates, and the American Community Survey (ACS) 5-year estimates.

operating efficiencies such as: locomotive productivity and reliability, fuel efficiency, increased average maximum train length, and capacity investments.

Regarding the potential for increased train trips and/or average maximum train length, BRPC notes that there have been fatalities in North Adams of individuals crossing the railroad tracks as they travel from American Legion Way towards and under Route 8. While this is a trespassing and not a grade crossing issue, it is an impact of increased rail traffic that BRPC anticipates will be addressed in the Board's EIS and BRPC looks forward to learning about mitigation measures to discourage and prevent trespassers and thus injuries and fatalities.

The alignment of the proposed Adventure to Ashuwillticook (A2A) Trail, a 9.3-mile active transportation corridor that will link the Mohican Recreational Trail in Williamstown through North Adams to the Ashuwillticook Trail at its current terminus at Lime Street in Adams, lies in close proximity to the rail line. BRPC anticipates the Board's EIS to evaluate air quality impacts on users of the A2A trail. Additionally, the A2A design can incorporate crossings of the rail line that can limit or eliminate trespassing issues in North Adams through bridges or tunnels. While BRPC plans to follow the consultation process described in the UP Public Projects Manual, we see the Board's EIS as an opportunity to jump-start that process through early coordination with UP to ensure A2A user and railroad safety.

Thank you for your consideration of these comments. BRPC looks forward to continued engagement throughout the Board's NEPA process and with UP as plans for the merger proceed.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura Brennan". The signature is fluid and cursive, with the first name "Laura" and last name "Brennan" clearly distinguishable.

Laura Brennan
Executive Director