



MECKLENBURG COUNTY
Land Use and Environmental Services Agency
-AIR QUALITY-

September 21, 2026

TRANSMITTED VIA E-FILING

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; Preliminary Consultation

Dear Ms. Webster,

Mecklenburg County Air Quality (MCAQ) has reviewed the information provided by the Surface Transportation Board's Office of Environmental Analysis (Board) for the proposed acquisition of Norfolk Southern Corporation/Norfolk Southern Railway by Union Pacific (the Transaction) to identify potential environmental impacts related to air quality. Specifically, MCAQ reviewed the operational changes that would occur at the Norfolk Southern Intermodal Facility located at Charlotte Douglas International Airport. This review was cursory, based on the limited information provided. The scope of the review was limited to the portion of the transactions in Mecklenburg County that met the thresholds for assessing environmental impacts, as outlined in the interactive map on the Board's project webpage.

Increased Intermodal Traffic Will Increase Air Pollution in an Ozone Maintenance Area

It is estimated that the Transaction will result in a 71.5% increase in truck traffic or an increase of 378 trucks per day at the Norfolk Southern Intermodal Facility. Using EPA's Diesel Emission Quantifier, MCAQ estimates that **the increase in drayage truck usage will result in pollution increases of 52 tons/year of nitrogen oxide (NO_x) and 0.08 tons/year of particulate matter (PM_{2.5}).**

Mecklenburg County has a history of violating the National Ambient Air Quality Standard (NAAQS) for ground level ozone and is currently designated a maintenance area. The region experiences several unhealthy air quality days each year due to ground-level ozone or PM_{2.5} or both. Mobile Source emissions account for 89% of ozone-forming air pollution in the county and reducing air pollution from cars, trucks and nonroad equipment is a priority for MCAQ.

Applicants Can Mitigate the Air Pollution Increases Resulting From the Transaction

MCAQ has identified the following opportunities to offset the emissions increases at the intermodal facility caused by the proposed Transaction. Mitigating the emissions increase can help ensure Mecklenburg County continues to meet the NAAQS for ground-level ozone and PM_{2.5}.

- **Intermodal Equipment Electrification:** Replacing diesel-powered equipment operating at the intermodal facility with electric alternatives could reduce NO_x emissions by several tons each year. For example, one local terminal tractor electrification project MCAQ supported in 2020 reduced 1.6 tons/year of NO_x.ⁱ
- **Locomotive Engine Repower:** Repowering a Tier 0 locomotive engine to a Tier 3 engine could reduce 5.85 tons/year of NO_x.ⁱⁱ
- **Idle Reduction Program:** Locomotive idle reduction/shore power technology could reduce 1 ton/year of NO_x per locomotive.ⁱⁱⁱ Idle reduction policies that cut idling by 50% for drayage trucks could further reduce NO_x emissions by 0.42 tons/year.^{iv}

Thank you for the opportunity to provide information for the Board to consider when evaluation the environmental impacts of the Transaction. If you have any questions related to the information above, please contact me at 704-336-5430 or Aaron.Matijow@mecknc.gov.

Sincerely,



Aaron B. Matijow
Air Quality Supervisor

ABM:isp

ⁱ Contracted emission reduction from Grants to Replace Aging Diesel Engines 2020 terminal tractor electrification project.

ⁱⁱ Estimated emission reductions from MCAQ's & Norfolk Southern's 2021 Congestion Mitigation and Air Quality grant application.

ⁱⁱⁱ Estimated emission reductions from MCAQ's & Norfolk Southern's 2021 Congestion Mitigation and Air Quality grant application.

^{iv} Estimated emission reductions from EPA's Diesel Emission Quantifier for Other Idle Control Strategies.