



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Region Office
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September 21, 2026

Elizabeth Webster
Surface Transportation Board
395 E Street SW
Washington, DC 20423

**Re: Union Pacific Corporation and Union Pacific Company – Control – Norfolk Southern Corporation and Norfolk Southern Railway Company; Preliminary Consultation
Docket No. FD 36873, Ecology SEPA# 202603498**

Dear Elizabeth Webster:

Thank you for the opportunity to comment on the Union Pacific acquisition of Norfolk Southern during early NEPA consultation. The Department of Ecology (Ecology) staff have reviewed the early project information and would like to share some initial concerns that we believe should be fully assessed during the environmental review process.

In Washington State, four areas appear likely to be impacted to some degree by this project: Spokane, Tacoma, Seattle, and Kent. We anticipate increased rail and truck traffic near these project locations. Work on the Tacoma rail line, in particular, will result in increased transport of hazardous materials.

Because increased truck and rail traffic may contribute to increased air pollution, air quality impacts should be a key part of the analysis for this project. Communities along the rail routes and near rail facilities may experience more air pollution. All four Washington project areas have been identified by Ecology as overburdened communities highly impacted by air pollution.

In addition, increased movement of hazardous materials could raise the risk of a potential spill. We encourage a full analysis of spill impacts and mitigation measures as part of your review.

Ecology appreciates the opportunity to engage early in this process and share these concerns. If you have any questions or would like to discuss further, please contact me at 425-681-6236 or by email at meg.bommarito@ecy.wa.gov.

Sincerely,

Meg Bommarito
Northwest Region Planner

Sent by email: Elizabeth Webster

ecc: Tom Buroker, Northwest Region Director, Ecology