



CITY OF HOUSTON

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Mayor

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September 23, 2026

Elizabeth Webster
Surface Transportation Board (Docket No. FD 36873)
395 E Street SW
Washington, DC 20423

RE: Acquisition of Norfolk Southern Corporation (NSC) and Norfolk Southern Railway Company (NS) by the Union Pacific Corporation (UPC) and Union Pacific Company (UP) (Docket No. F.D 36873)

Dear Ms. Webster:

In response to the Surface Transportation Board's (STB) Office of Environmental Analysis (OEA) letter dated August 19, 2026 requesting preliminary comments regarding any environmental issues or concerns the City of Houston (TX) ("COH") has with the acquisition of Norfolk Southern Corporation (NSC) and Norfolk Southern Railway Company (NS) by the Union Pacific Corporation (UPC) and Union Pacific Company (UP) (Docket No. F.D 36873) (the "Transaction") and in order to assist the OEA with preparation of an Environmental Impact Statement (EIS) as a part of the National Environmental Policy Act (NEPA) process, the COH respectfully submits the following comments:

According to UP's filings with the STB, the Transaction will create a projected **140% rise in intermodal truck traffic** and a **15% increase in auto-carrier truck traffic** within Houston over the 5 years following the merger, combined with increased rail traffic (and resultant train emissions and traffic delays). The areas that are projected to see the largest spikes in localized diesel emissions and truck traffic include the **Greater 5th Ward, OST/South Union, Greater East End, and Near Northside areas of Houston**.

Therefore, the COH requests that the STB specifically evaluate several key issues in the NEPA analysis that are local to Houston, as Houston is one of Union Pacific's rail hubs:

1. **Blocked Grade Crossings and Traffic Delays**

- a. **Increased Train Length and Volume:** The merger aims to create seamless transcontinental routes. Opponents warn that this will introduce more and substantially longer trains passing through Houston's urban corridors, threatening to worsen already frequent blocked crossings.
- b. **Emergency Response Impediments:** The NEPA review must model how additional train traffic will impact delays for local commuters and emergency first responders trying to navigate crossings in high-traffic sectors like the East End or Fifth Ward.

2. Hazardous Materials and Petrochemical Transport Risk

- a. **Rerouting Toxic Cargo:** The EIS must evaluate how single-line coast-to-coast service will change the routing of hazardous substances through Houston.
- b. **Spill and Derailment Risks:** Increased freight train traffic concentrated on Houston tracks elevates the statistical probability of localized derailments or hazardous material leaks, requiring strict scrutiny of rail infrastructure durability and emergency preparedness.

3. Air Quality and Environmental Justice

- a. **Localized Diesel Emissions:** While moving freight from long-haul trucks to rail lowers overall interstate greenhouse gas emissions, it concentrates diesel particulate matter (PM2.5) and nitrogen oxides around major switching yards and rail junctions, such as UP's Englewood Yard in Houston.
- b. **Environmental Justice Screenings:** Neighborhoods flanking Houston's rail corridors are disproportionately low-income and minority communities. The NEPA assessment must evaluate whether the merger inflicts an unfair, disparate burden of increased noise, vibration, and air pollution on these populations.

Below, please find COH's Health Department statistics specific to the Settegast neighborhood of Houston that demonstrates community impacts.

The Houston Health Department shares the following environmental and health information regarding Houston's Settegast community in ZIP code 77028 with the Surface Transportation Board for consideration in the National Environmental Policy Act (NEPA) review of Union Pacific's proposed acquisition of Norfolk Southern.

Low Life Expectancy: In 2023, ZIP code 77028, which includes Settegast, was reported by the Houston Chronicle as having the **lowest life expectancy** in Harris County at 66 years.

<https://www.houstonchronicle.com/news/houston-texas/housing/article/harris-county-life-expectancy-settegast-grant-17713960.php>

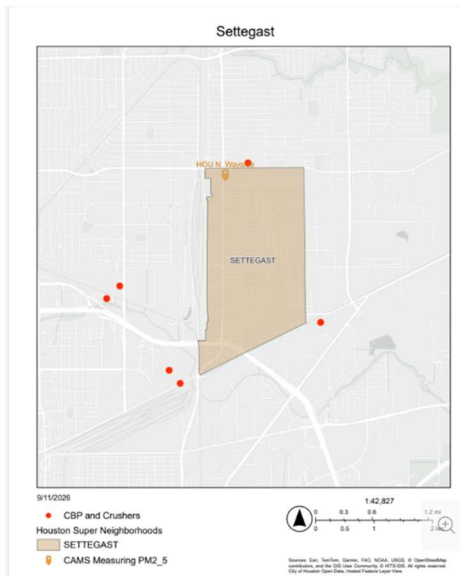
Air Pollution-related Health Events: Data from the Houston Health Department's Syndromic Surveillance System, which includes emergency department and urgent care data from >150 facilities, indicates the 77028 ZIP code ranks: **7th highest for asthma-related visits** (upper 5th percentile), **5th highest for stroke** (upper 4th percentile) and **8th highest for cardiac arrest** (upper 6th percentile) in 2025. These high rankings are also evident when evaluating over the past five years.

Concrete Batch Plant Area Sources that Emit PM2.5: There are four concrete batch plants located within ZIP code 77028 and two additional concrete batch plants immediately surround the ZIP code which may have varying impacts depending on wind direction. These sources are near residences due to Houston's lack of residential zoning and should be considered in the NEPA assessment.

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Existing PM2.5 Pollution Levels Data from the Houston North Wayside TCEQ monitor indicates elevated levels of PM2.5 especially when the wind is from the S, SE and E and the monitor is downwind of the concrete batch plants. The average PM2.5 concentration for 2026 as of August is 11 $\mu\text{g}/\text{m}^3$ which exceeds the NAAQS PM2.5 annual standard of 9 $\mu\text{g}/\text{m}^3$.



Thank you for your consideration.

Sincerely,

Joshua Sanders

Chief of Intergovernmental Relations
Office of the Mayor of the City of Houston

Cc:

Arturo Michel, City Attorney, City of Houston
Tramaine C. Singleton, Senior Assistant City