



Metro™

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

September 21, 2026

Elizabeth Webster
Surface Transportation Board (Docket No. FD 36873)
Office of Environmental Analysis
395 E Street SW
Washington, DC 20423
e-filing at www.stb.gov

**RE: UNION PACIFIC RAILROAD COMPANY AND NORFOLK SOUTHERN RAILWAY
COMPANY—MERGER APPLICATION**

COMMENTS AND REQUESTED ENVIRONMENTAL SCOPE FOR STUDY FOR THE LOS
ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY (LA METRO)

Dear Ms. Webster:

The Los Angeles County Metropolitan Transportation Authority (LA Metro) respectfully submits these scoping comments to the Surface Transportation Board (STB) and its Office of Environmental Analysis (OEA) regarding the proposed merger of Union Pacific Railroad Company (UP) and Norfolk Southern Railway Company (NS).

As the primary public transportation planner, coordinator, designer, builder, and operator for Los Angeles County—serving a region of over ten million residents—LA Metro has a vital interest in ensuring that the proposed transcontinental merger provides continued mobility and does not adversely affect Southern California’s passenger rail network, regional air quality, transit corridor development, or municipal traffic operations.

LA Metro requests that the OEA strictly incorporate the following items into the Scope of Study for the forthcoming Environmental Impact Statement (EIS):

I. PASSENGER RAIL INTERRUPTION AND METROLINK/LOSSAN CAPACITY ANALYSIS

LA Metro requests that the EIS include a comprehensive operational and capacity micro-simulation analysis evaluating how increased transcontinental freight volumes will impact passenger rail operations within Los Angeles County.

1. **Dispatching Priority Protection:** The OEA should evaluate whether increased freight traffic on UP-owned, operated, or shared tracks will degrade the on-time performance of Metrolink commuter rail operations (managed by the Southern

California Regional Rail Authority, which LA Metro funds and oversees) and Amtrak LOSSAN intercity services.

2. **Corridor Bottleneck Mitigation:** The EIS should specifically study the cumulative capacity of shared regional subdivisions, including the Valley, Alhambra, and Los Angeles Subdivisions.

II. AT-GRADE CROSSING CONGESTION, SAFETY, AND BUS TRANSIT DELAYS

The introduction of longer or more frequent freight trains traversing Los Angeles County could have cascading impacts on local street networks.

1. **Gate-Down Time Micro-Simulation:** The EIS should evaluate the localized environmental and economic impacts of increased "gate-down" times at highway-rail grade crossings. The study should explicitly measure the resulting vehicle idle emissions, local emergency response vehicle delays, and potential effects on LA Metro's and other LA County municipal bus operator's transit bus schedules.
2. **Proportional Grade Separation Funding:** The OEA should identify specific at-grade crossings where merger-related traffic surges will push intersections past acceptable levels of service or increase safety hazards. LA Metro requests that the STB require the Applicants to provide proportionate mitigations at these potential high-impact locations.

III. ENVIRONMENTAL JUSTICE AND CUMULATIVE AIR QUALITY IMPACTS IN PORT CORRIDORS

The proposed transaction aims to streamline transcontinental movements, which may drive higher throughput at the Ports of Los Angeles and Long Beach and adjacent intermodal rail facilities, including the Intermodal Container Transfer Facility (ICTF).

1. **Localized Emissions Modeling:** The EIS must include localized, community-level air quality modeling for diesel particulate matter (DPM), nitrogen oxides (NOx), and greenhouse gases along the primary freight corridors and rail yards adjacent to disadvantaged communities including but not limited to Commerce, Downtown Los Angeles, East Los Angeles, Industry, the South Bay, and Wilmington.
2. **Accelerated Zero-Emission Infrastructure Mandates:** To mitigate the compounding environmental burden on these Environmental Justice communities, LA Metro requests that the STB identify with the Applicants, mitigation measures

including an accelerated timeline for UP's deployment of zero-emission yard locomotives, zero-emission drayage trucks, and electric cargo-handling equipment within the Los Angeles basin, including through the Alameda Corridor and Alameda Corridor-East.

IV. REGIONAL GOODS MOVEMENT AND HIGHWAY TRUCK SHIFTS

As a stakeholder in regional goods movement, LA Metro is concerned with a shift in the broader modal split that may result from potential changes in UP's post-merger pricing, scheduling, and corridor prioritization.

1. **Alameda Corridor Utilization:** The OEA should analyze whether post-merger logistical shifts will optimize or degrade the use of the Alameda Corridor.
2. **Indicated Freeway Truck Diversion:** The EIS must evaluate whether any potential capacity constraints, structural bottlenecks, or pricing changes on the combined UP-NS network will cause a diversion of freight from rail to regional freeways (particularly on I-710, I-10, and SR-60). Any shift toward increased truck volumes could severely exacerbate highway congestion, accelerate pavement degradation, create air quality and public health concerns for disadvantaged communities, and conflict with LA Metro's regional congestion-management goals.
3. For the foregoing reasons, LA Metro respectfully requests that the Office of Environmental Analysis incorporate these critical capacity, right-of-way, safety, and environmental justice issues into the formal Scope of Study for the EIS, and that the STB condition any final transaction approval on feasible and enforceable mitigation requirements. Metro reserves the right to provide additional comments on the Draft EIS upon the release and review of the results of technical analysis in the Draft EIS.

Sincerely,



Ray Sosa
Chief Planning Officer