



September 18, 2026

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

RE: Docket No. FD 36873,; Preliminary Consultation

Dear Ms. Webster,

The City of Pittsburg (City) appreciates the opportunity to provide preliminary comments regarding the potential environmental impacts of Union Pacific Corporation's (UPC) proposed acquisition of Norfolk Southern Corporation (NSC).

Segment 116253

The City notes that the Surface Transportation Board's (Board) current environmental data identifies Segment 116253 of the Tracy Subdivision, extending from Brentwood to Port Chicago and passing through the City of Pittsburg, exceeds the Board's thresholds for air quality analysis. The Board's data also identifies the segment as being located within a Clean Air Act nonattainment or Class I area.

The City's review of the Board's environmental data indicates that Segment 116253 is projected to experience no increase in trains per day (tpd) between the Year 5 without-transaction and Year 5 with-transaction conditions (2.56 tpd in both scenarios), while annual gross ton miles are projected to increase from 17.05 million to 25.80 million, an increase of approximately 51.3 percent.

The City requests that the Environmental Impact Statement (EIS) identify the operational factors underlying this substantial increase in gross ton miles, including, as applicable, any changes in train length, train weight, locomotive configuration, commodity mix, or other operating characteristics, and evaluate the resulting environmental effects.

The City also requests that the EIS identify whether UPC's proposed acquisition would result in any changes to rail operations in the Port Chicago area, including train staging, switching, idling, or other rail yard or terminal activities, and evaluate any resulting environmental effects, if applicable.

Grade Crossings

The City requests that the EIS evaluate whether the projected increase in gross ton miles, including any associated changes in train length, speed, operating practices, or crossing occupancy times, could affect the duration or frequency of grade crossing blockages and emergency response. The City requests that the analysis consider potential effects on emergency services and other transportation users in the City of Pittsburgh.

Air Quality, Sensitive Receptors, and Cumulative Impacts

The City requests that the Board's Office of Environmental Analysis (OEA) evaluate the potential air quality effects associated with the projected increase in gross ton miles on Segment 116253, including:

- locomotive emissions associated with the increased gross ton-miles;
- diesel particulate matter;
- NOx and other ozone precursors;
- changes in locomotive operations;
- idling;
- train acceleration and deceleration;
- changes in train length/weight and locomotive configuration, as applicable; and
- potential impacts to nearby sensitive receptors.

Given the segment's location within a Clean Air Act nonattainment area, the City requests that the EIS clearly explain how the projected 51.3 percent increase in gross ton miles translates into changes in locomotive emissions and other air quality impacts.

The City further requests that the EIS identify and analyze sensitive receptors within an appropriate study area surrounding the rail corridor, including residential neighborhoods, schools, childcare facilities, parks and recreational facilities, senior housing, and medical facilities.

Finally, the City requests that the EIS evaluate cumulative air quality impacts associated with the proposed increase in rail activity in conjunction with existing and reasonably foreseeable industrial, freight, transportation, and other emission sources in Pittsburgh and the surrounding region.

Noise and Vibration

The City requests that the EIS evaluate changes in railroad noise and vibration associated with the projected increase in gross ton miles, including, as applicable, changes in train length, train weight, locomotive configuration, operating practices, nighttime activity, idling, acceleration and braking, and other operational characteristics that may affect noise and vibration levels.

Thank you for considering the City's comments. Please contact Alison Spells, Senior Planner, at aspells@pittsburgca.gov or 925-252-6987 if you have any questions regarding these comments.

Sincerely,



Darin Gale
City Manager, City of Pittsburgh

C: Jordan Davis, Director of Community and Economic Development
John Samuleson, Director of Public Works
John Funderburg, Assistant Director of Community and Economic Development
Sara Bellafronte, Assistant to the City Manager