

September 16, 2026

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

PRELIMINARY CONSULTATION RESPONSE – DOCKET NO. FD 36873, UNION PACIFIC CORPORATION AND UNION PACIFIC COMPANY – CONTROL – NORFOLK SOUTHERN CORPORATION AND NORFOLK SOUTHERN RAILWAY COMPANY

The Los Angeles County Department of Regional Planning (LA County Planning) appreciates the opportunity to provide preliminary comments on environmental issues and concerns associated with the proposed consolidation of Union Pacific and Norfolk Southern Corporation rail operations under Union Pacific.

As noted in the Preliminary Consultation Letter, this merger would create the country's first transcontinental railroad, increasing average trains per day on certain segments of the combined rail network and changing activity at some railyards and intermodal facilities.

Union Pacific currently operates and holds track rights throughout Los Angeles County, directly contributing to traffic, noise, and emissions impacts across the region, including within several unincorporated communities under LA County jurisdiction. To highlight these concerns, we identified several unincorporated communities located in closest proximity to the rail network, as well as relevant LA County Planning policies to consider as part of this merger review.

Impacted Unincorporated Communities

Los Angeles Subdivision

The easternmost section of the Los Angeles Subdivision rail line operates immediately adjacent to established single-family residential neighborhoods (R-1) within the unincorporated communities of Hacienda Heights, Avocado Heights, and North Whittier.

Los Angeles Subdivision & Los Angeles Intermodal Terminal

The westward section of the Los Angeles Subdivision rail line runs directly alongside the southern boundary of the unincorporated community of East Los Angeles's established single-family and multi-family residential neighborhoods.

This unincorporated residential area is particularly significant because it abuts Union Pacific's major freight hub, the Los Angeles Intermodal Terminal, located in the City of Commerce. According to the published [UP-NS Merger Interactive Map](#), this merger is projected to cause significant impacts at the intermodal facility due to a 10.5% growth in daily truck traffic within a 5-year period that will exceed current Trucks Per Day (TPD) thresholds.

Consequently, East Los Angeles faces a substantial cumulative burden. Residents are not only exposed to the effects of expanded freight rail capacity across the regional network but also live adjacent to a major freight logistics hub that will have increased activity due to the proposed merger.

Alhambra Subdivision

Union Pacific's network also extends west by East Pasadena-East San Gabriel, where the railroad runs along the southern edge of the community, immediately adjacent to established single-family residential areas.

Alameda Corridor

Union Pacific's rail network also extends through several densely populated, urbanized unincorporated communities farther west in the County. For example, the Alameda Corridor traverses south through the eastern portion of the unincorporated community of Florence-Firestone and runs immediately adjacent to the established commercial center, Alameda Plaza. Segments of the Alameda Corridor also pass within approximately 500 feet of established residential (R-3) neighborhoods in unincorporated Walnut Park. Farther south, the railroad runs alongside the northeastern and southeastern edges of the unincorporated community of Willowbrook, where it runs immediately adjacent to established residential neighborhoods.

Wilmington Subdivision

Other segments of the Union Pacific network run parallel to the LA Metro A Line and pass through the heart of established unincorporated communities and their recently implemented Transit-Oriented Districts (TODs).

In Florence-Firestone, the railroad corridor runs through established commercial and residential areas, as well as emerging TOD areas rezoned to accommodate increased residential and commercial density (including RLM-1, RLM-2, MU-3, RM, and R-3 zones) under the Florence-Firestone Transit Oriented District Specific Plan (2023).

Further south, the corridor extends through established and emerging commercial and residential areas within the unincorporated community of Willowbrook, designated for transit-oriented development (MU-1, RES-3, RES-1) through the Willowbrook Transit Oriented District Specific Plan (2024). The rail line then continues into deeply residential areas characterized by R-2 and R-3 zoning.

This segment of the Wilmington Subdivision rail line is particularly notable because the railroad corridor operates at grade within a highly urbanized community and runs on tracks parallel to LA Metro's most utilized light rail line. Additionally, the tracks lack a substantial buffer to separate them from adjacent residential areas.

The proximity of the tracks to existing homes, businesses, and areas planned for additional density is therefore important to consider, as future growth could place more residents near an active freight rail corridor.

El Segundo Industrial Lead

Elsewhere in the Union Pacific network, railroad segments pass directly adjacent to established residential areas (CSLA R-1, CSLA R-2) in the unincorporated community of West Athens-Westmont.

The tracks then continue westward, running immediately parallel to an established single-family residential area in the southeastern corner of the unincorporated community of Del Aire. This segment of the network is also within 500 feet of established residential areas (R-1, R-3) in the uppermost northwest corner of the unincorporated community of Wiseburn.

Torrance Industrial Lead

The Union Pacific network also extends into West Rancho Dominguez-Victoria, where the railroad runs south along the western edge of the community, immediately adjacent to residential areas (R-1, R-2) and a community park. Surrounded by industrial zones, these residential areas already face significant cumulative environmental impacts.

Farther south, the network runs parallel to the western edge of unincorporated West Carson before diverging west directly across from established commercial properties (C-3), residential properties (R-2), and an 8.6-acre community park.

Recommendations

As Union Pacific moves forward with the merger, the Surface Transportation Board should consider the environmental impacts on surrounding unincorporated communities as described above.

The County Board of Supervisors recently adopted the following land use plans to address how development should occur in those communities:

- East San Gabriel Valley Area Plan (ESGVAP - 2024) – Avocado Heights, Hacienda Heights, North Whittier
- West San Gabriel Valley Area Plan (WSGVAP - 2024) – East Pasadena-East San Gabriel
- Metro Area Plan (MAP - 2024) – East Los Angeles, Florence-Firestone, Walnut Park, Willowbrook, West Athens-Westmont, and West Rancho Dominguez-Victoria

- South Bay Area Plan (SBAP - 2025) – West Carson

Considering the project's proximity to urbanized residential neighborhoods and increased train traffic through these areas, LA County Planning recommends that the forthcoming EIS provide a more focused evaluation of the merger's short- and long-term potential impacts and compatibility with established unincorporated communities immediately adjacent to the rail network.

The County's specific comments are below:

1. Land Use

Policies across various Area Plans call for an orderly transition to cleaner industries compatible with their immediate environments and residential areas, as outlined in MAP Policy LU 6.1, 7.1 and SBAP Policy 5.3.

These policies reinforce LA County General Plan Policy LU 7.1, which calls for reducing and mitigating of impacts of incompatible land uses, where feasible, using buffers, appropriate technology, building enclosure and other building techniques.

LA County's Green Zone Ordinance (2022) implements and enforces this General Plan policy framework. The ordinance requires industrially zoned parcels within 500 feet of sensitive areas—such as homes, schools, and parks—to include solid walls, street-front landscaping, enclosed hazardous materials storage, among other mitigation measures. It applies to 11 designated unincorporated communities that have been disproportionately affected over time by toxic pollutants and contaminants, including but not limited to:

- Avocado Heights
- East LA
- Florence-Firestone
- Walnut Park
- West Athens-Westmont
- West Carson
- West Rancho Dominguez-Victoria
- Willowbrook.

While rail corridors may not strictly meet the technical criteria for industrially zoned parcels, the clear intent of the Green Zone Ordinance is to mitigate environmental impacts from industrial activity. Therefore, active freight corridors warrant similar mitigation to address community concerns.

To address these concerns, the County recommends

- Evaluating whether additional screening or buffering around existing railroad rights-of-way is warranted based on the environmental analysis
- Identify site-design measures to strengthen the transition between the railroad rights-of-way and residential uses

2. Environmental Hazards

The EIS should provide detailed evaluation of both short-term and long-term health and environmental risks for communities and ecosystems adjacent to the rail network and its facilities. Increased goods movement activity at these locations may directly harm nearby unincorporated residential neighborhoods by driving localized increases in air emissions and noise pollution, in addition to increasing the risk of hazardous cargo derailments.

According to the published [UP-NS Merger Interactive Map](#), the Alameda Corridor is a network segment projected to experience transaction-related growth of one or more hazardous material carloads per day, leading to an annual increase of 72,065 hazardous material carloads.

This comprehensive analysis is therefore recommended to maintain consistency with local Area Plan policies that prioritize preventing toxic harm to communities, prohibit land uses that pose environmental health risks, call for hazard management, require mitigating disproportionate health and environmental impacts on residents and adjoining uses, and which encourage limiting truck access and parking within residential streets (ESGV Policy LU 1.6, 3.22, 3.23, Metro AP Policy LU 7.3, South Bay Policy LU 5.4, Policy M 3.5, WSGVAP Policy LU 4.1)

3. Air Quality

The County recommends a localized evaluation of air-quality impacts on unincorporated residential areas immediately adjacent to the railroad network and intermodal facilities. Policies ESGVAP Policy LU 3.24, LU 3.25, MAP Policy LU-1.4, and WSGVAP Policy LU 4.4 promote improved indoor air quality and community air monitoring in disproportionately burdened communities; they also seek to mitigate emissions and ensure compliance with industrial emission control regulations and call for buffering sensitive land uses from pollutant emitting sources (WSGVAP Policy LU 2.9). To support these goals, the EIS should evaluate long-term operational emissions, including diesel particulate matter from freight, and emissions from truck idling and truck trips.

The County recommends:

- Consideration of community air-quality monitoring consistent with ESGVAP Policy LU 3.25

4. Noise

Given the project's proximity to residential areas, the County recommends a focused evaluation of operational noise and vibration resulting from increased freight and trucking activity. MAP Policy LU

1.3, SBAP Policy LU 5.1, ESGVAP Policy LU 3.21, and WSGVAP Policy LU 4.2 specifically identify noise and vibration as potential impacts requiring consideration where industrial uses adjoin other land uses and advocate for sound insulation buffering to reduce such impacts.

Accordingly, the EIS should evaluate how increased freight activity impacts noise emissions during early-morning and nighttime operations, particularly along railroad tracks and crossings abutting residential areas. Additionally, the analysis should assess noise and vibration impacts stemming from truck loading activities, heavily utilized truck routes, and shifted truck traffic patterns around the intermodal facilities.

5. ROW Maintenance

Additionally, LA County requests that Union Pacific fulfill its duty of care and properly maintain its existing railroad rights-of-way, which continue to show signs of neglect. As the company plans for expansion, it must meaningfully address illegal dumping, sanitation issues, and nuisances across its private rail right-of-way.

Thank you for the opportunity to provide comments on this project.

If you have any questions regarding this matter, please contact my staff Pat Hachiya, AICP at phachiya@planning.lacounty.gov.

Sincerely,



Amy J. Bodek, AICP
Director of Regional Planning

AJB:CC:ER:PH:AM