



City of Galt
Community Development Department
Building – Planning – Code Enforcement
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September 23, 2026

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

Subject: Docket No. FD 36873 Preliminary Comments, Environmental Impact State Consultation Request: Union Pacific Acquisition of Norfolk Southern

Dear Ms. Webster,

The City of Galt (City) appreciates the opportunity to provide comments to the Surface Transportation Board (the Board) regarding Docket No. FD 36873, Union Pacific Railroad Company acquisition of Norfolk Southern Railway Company (the Transaction).

Background

On April 30, 2026, Union Pacific Corporation (UPC), Union Pacific Railroad Company (UPRR), Norfolk Southern Corporation (NSC), and Norfolk Southern Railway Company (NS) filed a revised application with the Board seeking authority for the acquisition of control by UPC of NSC, the control by UPC of UPRR and NS, and the consolidation of the rail operations of UPRR and NS.¹ UPRR operates approximately 32,880 miles of rail line in the western two-thirds of the United States and NS operates 19,200 miles of rail line in the eastern United States. If the Board authorizes the Transaction, the combined UPRR-NS network would be comprised of approximately 50,000 miles of rail line across the United States. The Transaction would result in changes in rail traffic on portions of the combined rail network. To assess the potential environmental impacts associated with the Transaction, the Board's Office of Environmental Analysis (OEA) will prepare an Environmental Impact Statement pursuant to the National Environmental Policy Act (NEPA).

Two UPRR rail lines run through the City of Galt, including through several residential and commercial areas of the City. The rail line known as 10665-FRESNO SUB (segment 10665) runs north/south through the middle of the City. A second track known as 11057-OTHER GALT-IONE (segment 11057) runs northeast/southwest from approximately Elm Avenue beyond Twin Cities Road. Segment 11057 was added to allow slower freight trains to switch to the sidetrack so that faster passenger trains could pass.

¹ Surface Transportation Board. *Overview of the Transaction*. Available at: <https://www.stb.gov/upns-eis-fd36873/transaction/>. Accessed September 2026.

According to the City of Galt General Plan², freight trains passing through Galt are getting excessively long, traveling at speeds between 30 and 60 mph. The trains do not run on a uniform schedule but instead pass through Galt during randomly distributed times both day and night. The number of freight trains has significantly increased in recent years. Segment 10665 experiences approximately 27 trains per day on an irregular schedule. Without current railroad grade separation, these delays and inconveniences disrupt east/west cross-town City traffic. Furthermore, the lack of railroad grade separation has created a problem for cross-town emergency response. Thus, the City has direct interest in how the proposed Transaction, and the increased rail volume associated, will impact the City.

Air Quality Analysis Thresholds

According to the Union Pacific Acquisition of Norfolk Southern Data Explorer³ showing the locations of the rail lines, rail yards, and intermodal facilities that would experience operational changes that would exceed the Board's environmental analysis threshold, segment 10665 would exceed the Board's thresholds for air quality analysis pursuant to 49 Code of Federal Regulations (CFR) § 1105.7(e)(5). Specifically, the approximate number of trains per day traveling on segment 10665 is expected to increase to 31 by year 5 of the Transaction, compared to the anticipated 27 in absence of the Transaction. Pursuant to 49 Code of CFR § 1105.7(e)(5), the prepared environmental report should include an air quality analysis if the proposed action results in an increase in rail traffic of at least 50 percent or an increase of at least three trains a day on any segment of rail line. As the approximate number of trains per day is anticipated to increase by four, the Board must analyze air quality in the preparation of the environmental impact statement for the Transaction.

City of Galt Concerns

According to the California Air Resources Board (CARB)⁴ diesel-powered locomotives emit multiple air pollutants including diesel particulate matter (DPM), fine particulate matter (PM_{2.5}), oxides of nitrogen (NO_x), and greenhouse gases (GHGs). Exposure to diesel emissions is known to lead to cancer, increases in asthma, cardiopulmonary illness, hospitalizations, and premature mortality. Communities near rail operations bear a disproportionate health burden due to their proximity to harmful emissions. The City of Galt is concerned about how increased rail traffic will impact air quality and exacerbate health burdens within the City. Thus, the City requests that the EIS include a regional air quality analysis for the City and surrounding areas.

Some land uses are considered more sensitive to air pollution than others, due to the types of population groups or activities involved. Heightened sensitivity may be caused by health problems, proximity to the emissions source, and/or duration of exposure to air pollutants. Children, pregnant women, the elderly, and those with existing health problems are especially vulnerable to the effects of air pollution. Sensitive receptors are typically defined as facilities

² City of Galt. *2030 Galt General Plan Existing Conditions Report*. November 2005.

³ Surface Transportation Board. *Interactive Map*. Available at: <https://www.stb.gov/upns-eis-fd36873/maps/>. Accessed September 2026.

⁴ California Air Resources Board. *Locomotive Fact Sheets*. Available at: <https://ww2.arb.ca.gov/our-work/programs/reducing-rail-emissions-california/locomotive-fact-sheets>. Accessed September 2026.

where sensitive receptor population groups (i.e., children, the elderly, the acutely ill, and the chronically ill) are likely to be located. Accordingly, land uses that are typically considered to be sensitive receptors include residences, schools, playgrounds, childcare centers, retirement homes, convalescent homes, hospitals, and medical clinics. Near segment 10665, sensitive land uses include single-family residences, a preschool, an elementary school, a park, a nursing home, and multi-family residences for seniors. According to CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* (Handbook)⁵, key pollutants from trains include volatile organic compounds (VOCs), NO_x, carbon monoxide (CO), sulfur oxides (SO_x), PM₁₀, DPM, and other toxic air contaminants (TACs). The City is concerned about how increased rail traffic will impact the health of sensitive receptors and other disproportionately impacted populations in the region. Thus, the City requests that the EIS include a Health Risk Assessment to specifically analyze the impacts of increase rail traffic on these populations.

The City is also concerned about how increased rail traffic will impact circulation and access, particularly between the east and west sides of the City. Segment 10665 crosses over eight streets in the middle of the City, including East Forest Lake Road, Kost Road, F Street, C Street, A Street, Elm Avenue, Spring Street, and Twin Cities Road.⁶ The City's street network and fire and police services rely on the ability to cross UPRR's tracks without delay to connect the east and west sides of Galt. Without current railroad grade separation, the increased rail traffic could exacerbate the existing circulation and cross-town emergency response issues the City faces. Additionally, the City's Sphere of Influence extends both east and west beyond the City boundaries. The City is concerned that potential circulation and emergency response issues caused by increased rail traffic may negatively impact opportunities for future development beyond the City Limits. Thus, the City requests that the EIS evaluate the Transaction's impact on circulation and emergency response in Galt.

Although segment 10665 is not anticipated to exceed the Board's thresholds for noise pursuant to 49 CFR § 1105.7(e)(5), the rail line passes through several residential and commercial areas of the City that already experience increased noise due to rail operations. According to the City's General Plan⁷, maximum noise levels from individual trains ranged from 83 A-weighted decibels (dBA) without use of the horn to 92 dBA with the horn at a distance of 100 feet. According to Chapter 8.40.040 of the City's Municipal Code, the maximum noise level may not exceed 70 dBA during daytime hours and 65 dBA during nighttime hours. As noted above, trains pass through Galt during randomly distributed times both day and night, through residential areas, and through areas with sensitive receptors. Thus, it is likely that current rail traffic exceeds the City's maximum noise levels and increased rail traffic will exacerbate this impact. High noise levels can interfere with many human activities in a way which degrades public health and welfare. The City therefore requests that increased noise levels in Galt be analyzed in the EIS, with consideration given to the City's Noise Ordinance Thresholds.

According to the UP-NS Updated Master Segment Tables for Errata Filing⁸, the Transaction is projected to increase hazardous materials carloads by approximately 218 per year. Any increase

⁵ California Air Resources Board. *Air Quality and Land Use Handbook: A Community Health Perspective*. April 2005.

⁶ Union Pacific. *UP-NS Updated Master Segment Tables for Errata Filing*. July 27, 2026.

⁷ City of Galt. *2030 Galt General Plan Existing Conditions Report*. November 2005.

⁸ Union Pacific. *UP-NS Updated Master Segment Tables for Errata Filing*. July 27, 2026.

in the volume of hazardous materials moving through Galt increases routine exposure risk and the potential consequences of derailment, including derailment of railcars carrying hazardous materials. The City requests that the EIS disclose and evaluate projected hazardous materials volume and routing through Galt, assess derailment risk associated with increased rail traffic, and evaluate the adequacy of local emergency planning and response given these risks.

Finally, the Transaction is projected to decrease the number of trucks on the road by 2.1 million throughout the United States. The City is interested in the net impact of decreased truck traffic air quality and traffic in the City and general region and requests that this be integrated into the EIS.

Conclusion

We urge that all above-mentioned concerns are evaluated in the EIS prepared by the Surface Transportation Board. Thank you for the opportunity to provide these comments and for your consideration of the concerns of the City of Galt. The City of Galt looks forward to reviewing the EIS.

If the Surface Transportation Board has any questions or would like to address the City of Galt's concerns regarding the Transaction, please contact:

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Sincerely,

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