Maura Healey, Governor
Kimberley Driscoll, Lieutenant Governor
Phillip Eng, Interim MassDOT Secretary
Meredith Slesinger, MassDOT Rail & Transit Administrator

massDOT
Massachusetts Department of Transportation
Rail & Transit Division

October 28, 2026

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

RE: ***Docket No. FD 3673- Union Pacific – Norfolk Southern Merger***
Environmental Scoping Comments

Dear Elizabeth Webster:

The Massachusetts Department of Transportation (MassDOT) appreciates the opportunity to comment on the scope for the environmental review of the proposed Union Pacific–Norfolk Southern merger.

The transaction could change freight rail and truck activity in Massachusetts, with effects on communities and transportation infrastructure. The nature and extent of those effects will depend on changes in freight volumes and routes, as well as how freight is distributed between rail and truck.

MassDOT requests that the Office of Environmental Analysis (OEA) consider the following issues when developing the scope of the Environmental Impact Statement (EIS).

Ayer intermodal facility and surrounding roadways. OEA should obtain the data needed to evaluate the environmental effects of projected changes in activity at the Ayer intermodal facility. The analysis should address associated rail operations and truck traffic, including:

- Changes in truck trips and routes serving the facility and their effects on local roads, intersections, congestion, and traffic safety.
- Air emissions, noise, and vibration from terminal operations and truck traffic, including effects on nearby neighborhoods and other sensitive locations.
- Facility or roadway improvements needed to accommodate changes in activity, including construction impacts.

Rail traffic and affected communities. The EIS should identify Massachusetts rail routes that could experience changes in freight traffic, including the CSX Boston & Albany corridor and the Pan Am Southern route operated by Berkshire & Eastern Railroad. For affected communities, the analysis should consider changes in train frequency, length, and operations, as well as the resulting effects on noise, vibration, air emissions, and safety. It should also address grade crossing delays, blocked crossings, emergency vehicle access, and changes in activity at yards, terminals, and interchange points.

OEA should also consider environmental impacts from reasonably foreseeable changes in traffic or infrastructure on connecting and secondary railroads, including facilities not owned or operated by the Applicants.

Passenger rail service and shared infrastructure. Changes in freight operations could affect Massachusetts Bay Transportation Authority commuter rail service on the Fitchburg Line, as well as existing or planned Amtrak and other passenger services, including on the Boston & Albany corridor. OEA should evaluate the effects of changes in freight activity on shared rail infrastructure and identify reasonably foreseeable improvements or operating changes needed to accommodate freight and passenger service. The analysis should address the environmental effects of those improvements, including construction impacts.

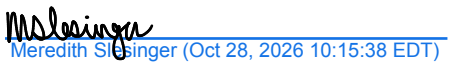
Infrastructure and cumulative effects. The EIS should identify infrastructure improvements that may be needed to accommodate projected merger-related growth, including projects that have not yet been fully developed. As appropriate, the review should assess their effects on land use, wetlands and other natural resources, historic resources, and nearby communities. OEA should also consider the combined effects of reasonably foreseeable changes in rail operations, terminal activity, truck traffic, and infrastructure.

To support the review, MassDOT requests that OEA obtain and make available the underlying traffic forecasts, proposed rail routes and operating plans, terminal activity estimates, truck trip assumptions, and relevant capacity analyses. Where information is uncertain, the EIS should explain the uncertainty and consider a reasonable range of potential outcomes.

MassDOT welcomes the opportunity to coordinate with OEA and provide information about Massachusetts transportation infrastructure, passenger operations, and affected communities as the environmental review proceeds.

Thank you for considering these comments.

Sincerely,


Meredith Slesinger (Oct 28, 2026 10:15:38 EDT)

Meredith Slesinger
MassDOT Rail & Transit Administrator