Outlook

[External] Docket No. FD 36873, Union Pacific Corporation and Union Pacific Railroad

From Erin Murphy <EMurphy@VHB.com>
Date Mon 11/2/2026 12:57 PM
To Carrie Broussard <cbroussard@crt.la.gov>; Sadie Whitehurst <swhitehurst@crt.la.gov>; section106@crt.la.gov <section106@crt.la.gov>
Cc Tabachnick, Alan <alan.tabachnick@stb.gov>; Webster, Elizabeth <Elizabeth.Webster@stb.gov>; Bela Gadgil <bgadgil@vhb.com>; Alan Summerville <asummerville@vhb.com>; Rachel McNamara <rmcnamara@vhb.com>

1 attachment (6 MB)
UP-NS_Section 106 Consulting Party Invitation Letter_Louisiana.pdf;

Caution: External email. Exercise caution when clicking links, opening attachments, or providing sensitive information.

Hi Louisiana SHPO team,

As per our meeting held on 9/22/26, I am transmitting our formal Section 106 Notification Letter. Please note the reply requested in Attachment 2.

We appreciate all of your help to date and look forward to continuing to work with you on this project.

Thanks,

Erin

Erin Murphy
Environmental Services Leader
Environmental-Atlanta

P 404.417.4086
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Suite 420
Atlanta GA 30309-3269

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SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

November 2, 2026

Carrie Broussard
State Historic Preservation Officer
Louisiana Office of Cultural Development, Division of Historic Preservation
P.O. Box 44247
Baton Rouge, LA 70804

By email at section106@crt.la.gov

RE: Docket No. FD 36873, Union Pacific Corporation and Union Pacific Railroad Company – Control – Norfolk Southern Corporation and Norfolk Southern Railway Company; Section 106 Consultation

Dear Carrie Broussard,

The purpose of this letter is to invite you to participate as a consulting party in the Section 106 process for the above-referenced proceeding. On April 30, 2026, Union Pacific Corporation (UPC), Union Pacific Railroad Company (UP), Norfolk Southern Corporation (NSC), and Norfolk Southern Railway Company (NS) (collectively, Applicants) filed a revised application with the Surface Transportation Board (Board) in Docket No. FD 36873 seeking authority for (1) the acquisition of control by UPC of NSC, and through NSC of NS and NS's rail carrier subsidiaries, and (2) the resulting common control by UPC of UP and NS and the consolidation of the rail operations of UP and NS (the Transaction).

As part of the review process, the Board's Office of Environmental Analysis (OEA) is preparing an Environmental Impact Statement (EIS), in accordance with the National Environmental Policy Act (NEPA) (42 U.S.C. §§ 4321-4370m-11), that will assess the potential environmental impacts of the Transaction. The EIS will also assess potential impacts on historic properties from transaction-related capital improvements in accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and the Section 106 implementing regulations (36 C.F.R. Part 800).

Description of the Transaction

According to Applicants, UP's acquisition of NS would create the country's first transcontinental railroad. UP operates approximately 32,880 miles of rail line in 23 states in the western two-thirds of the United States. UP has eight principal routes: three anchored in Chicago, three anchored in Los Angeles, one between border crossings in Mexico and Chicago, and one between Seattle and Los Angeles. NS operates approximately 19,200 route miles in 22 eastern states and the District of Columbia. Four principal routes are the core of NS's network: three run between Chicago, Atlanta/Chattanooga, and the Northeast, and a fourth runs from Chicago to Norfolk. If the Board authorizes the Transaction, UP and NS would combine into a single rail system to be known as Union Pacific. The Transaction would be mostly "end to-end" because the existing UP and NS systems only overlap in Missouri and Illinois.

The Transaction would involve: (1) changes in operations (such as, an increase in average trains per day) on certain segments of the combined system that would exceed the Board's thresholds for environmental review, (2) changes in activity at some rail yards and intermodal facilities that would exceed the Board's thresholds for environmental analysis, and (3) capital improvements to increase capacity along the UP and NS mainlines and expand UP and NS yards and intermodal facilities. No construction of new rail lines that would require a license from the Board or abandonments of existing rail lines are planned. Consistent with past practice in merger cases, OEA will focus the Section 106 review on the capital improvement projects that Applicants would undertake as part of the Transaction because those projects are the only components of the Transaction that could have the potential to affect cultural resources.

To support increased rail traffic on the combined system, Applicants are proposing capital improvements along the UP and NS mainlines and expansions of the footprints at some yards and intermodal facilities as part of the Transaction. These Transaction-related capital improvements would take place in Alabama, Arizona, Arkansas, California, Florida, Georgia, Illinois, Indiana, Iowa, Kansas, Louisiana, Mississippi, Missouri, New Mexico, Ohio, Tennessee, and Texas. The interactive map on the Board's project webpage (https://www.stb.gov/upns-eis-fd36873/maps/) shows the locations of the proposed capital improvements. **Please see Attachment 1 for details and a map of the proposed capital improvement(s) in your area of interest.**

Area of Potential Effects

The area of potential effects (APE) for historic properties will be defined in accordance with 36 C.F.R. Part 800, 49 C.F.R. § 1105.8, and precedent set by previous mergers. The APE will include the linear extent of each capital improvement, the areas of physical disturbance (construction, staging, access), as well as the viewshed for each proposed capital improvement location. Based on the information available to date, OEA anticipates that the majority of the construction activity would take place within the existing right-of-way and in previously disturbed areas; however, some small areas of additional right-of-way acquisition or temporary

easements are anticipated for some capital improvement locations to accommodate improved drainage structures or similar needs. The APE will be further refined as additional information becomes available during the Section 106 process.

Request for Consultation

Please complete the attached Consultation Questionnaire (**Attachment 2**) to provide feedback on your interest in participating in the Section 106 process by December 2, 2026. If you have any questions or would like to discuss the project in more detail, please do not hesitate to contact Alan Tabachnick of my staff at 202-245-0367 or by email at alan.tabachnick@stb.gov. We look forward to your participation in the Board's environmental and historic review process.

Sincerely,

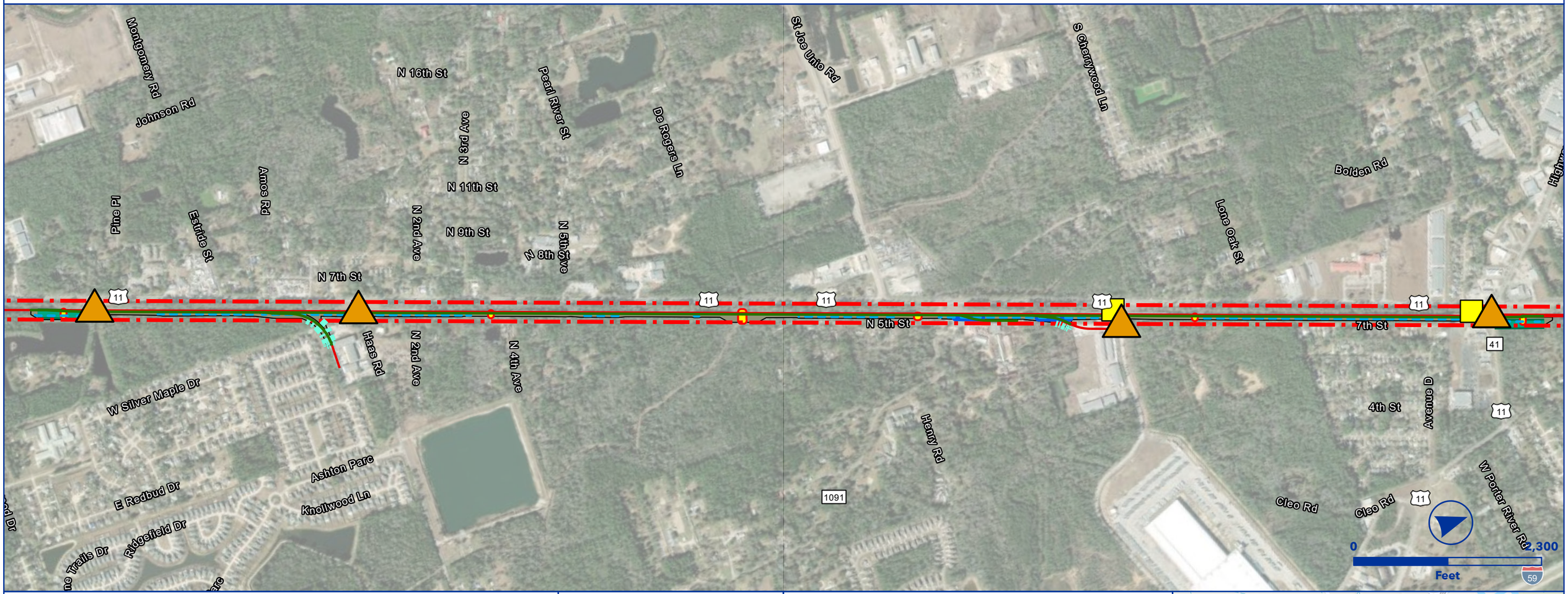


Danielle Gosselin
Director
Office of Environmental Analysis

Enclosure:
Attachment 1: Details regarding proposed capital improvement(s)
Attachment 2: Questionnaire

Attachment 1: Details regarding proposed capital improvement(s)

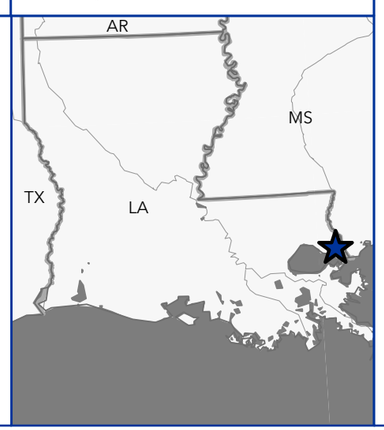
Overall View of Full Limits of Capital Improvement



PEARL RIVER SIDING EXTENSION

NEW ORLEANS (NO) & NORTHEASTERN (NE) SUBDIVISION

- Owner Railroad - NS
- Upgrade siding to 40 mph.
- Install #20 power turnouts.
- Extend siding south 9,000 track feet (TF) from mile post (MP) NO -161.4 to achieve 15,000 TF clear length.
- Requires new siding track structure at MP NO-162.90 for waterway.
- Lat/Long - Start: 30.3365, -89.7597; End: 30.3764, -89.7440



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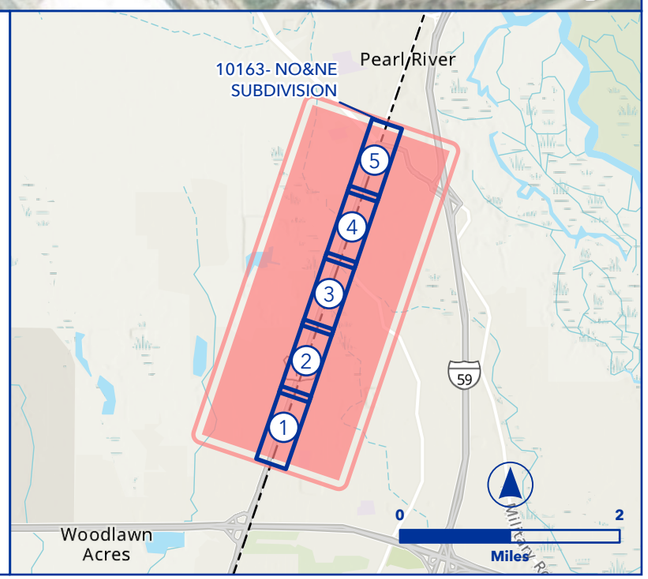
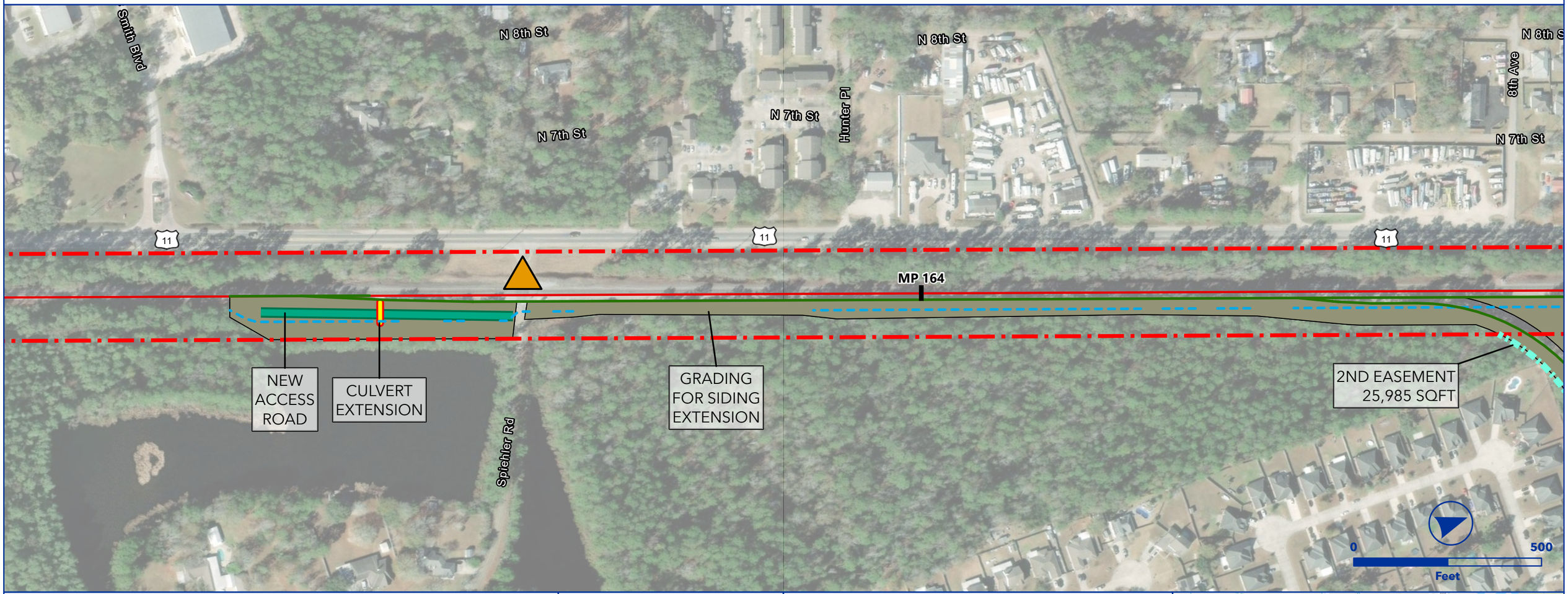


Plate 1



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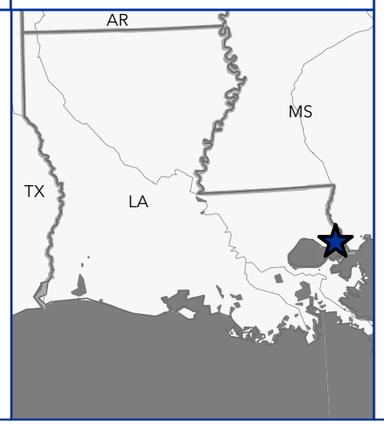

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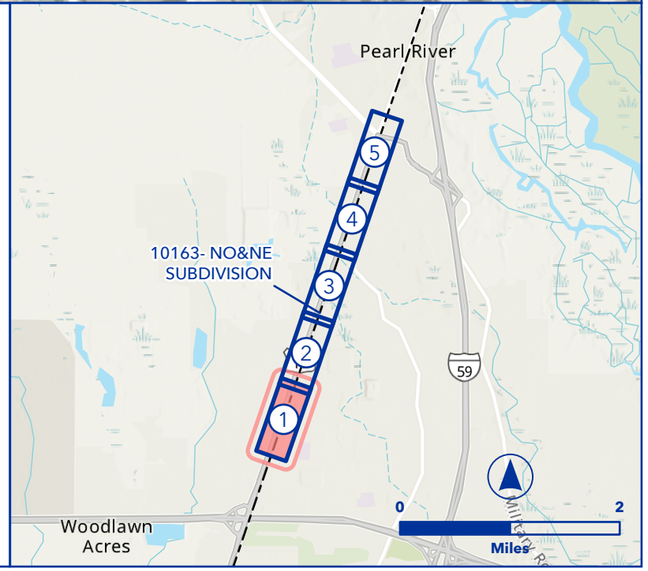
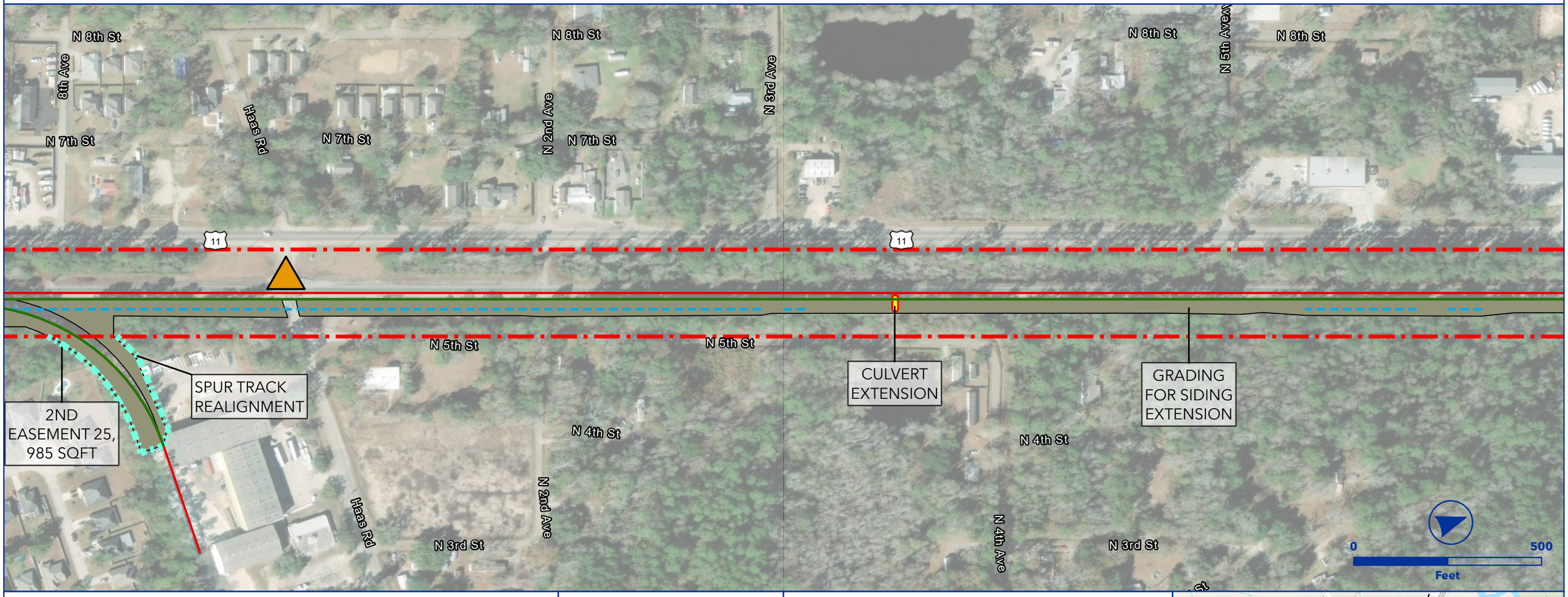


Plate 2



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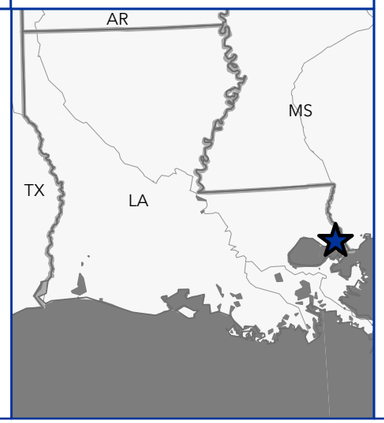

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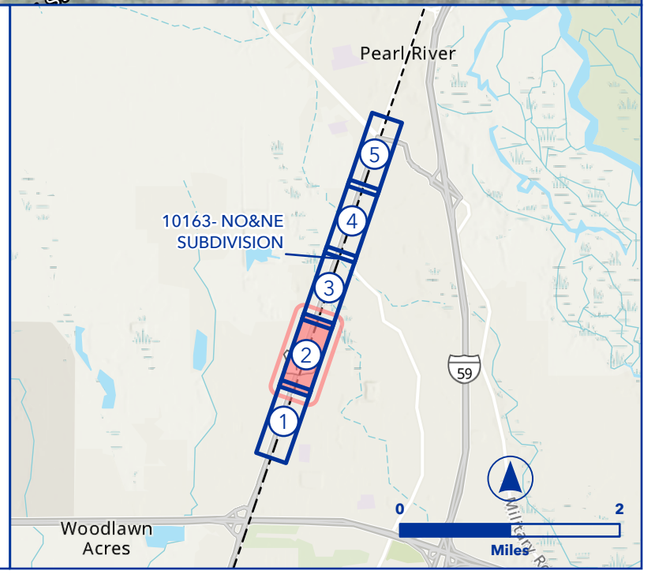

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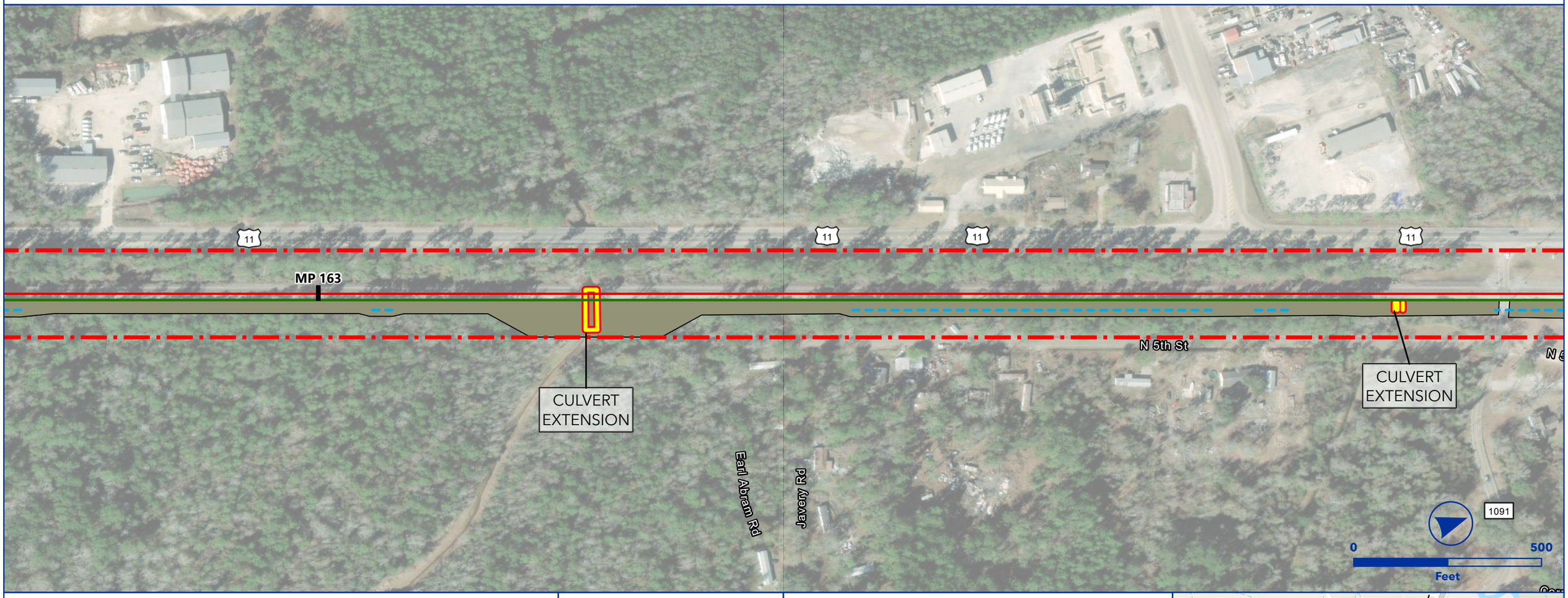

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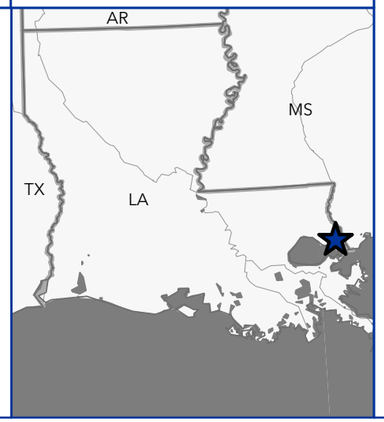

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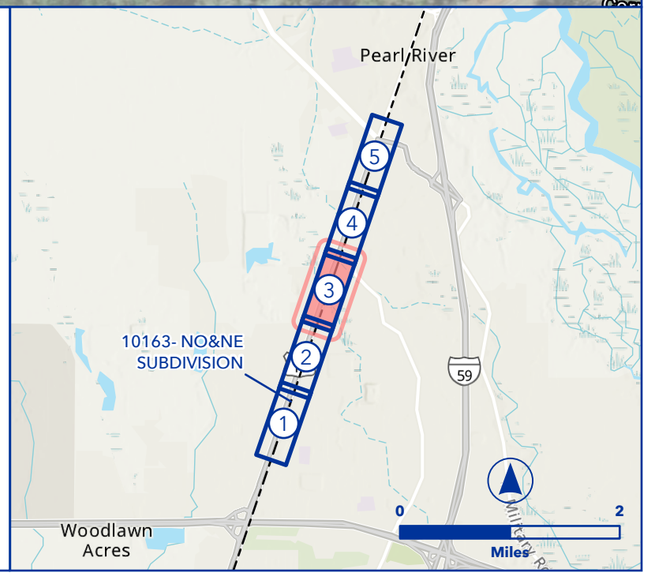

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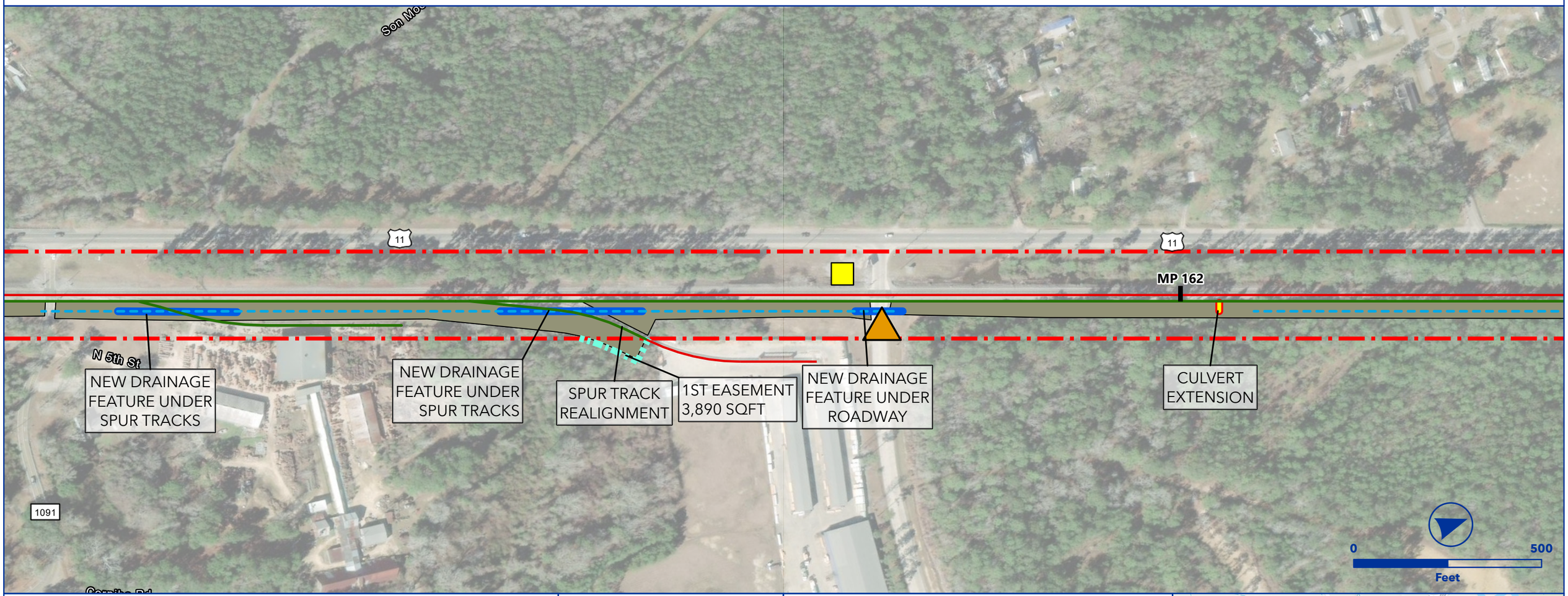

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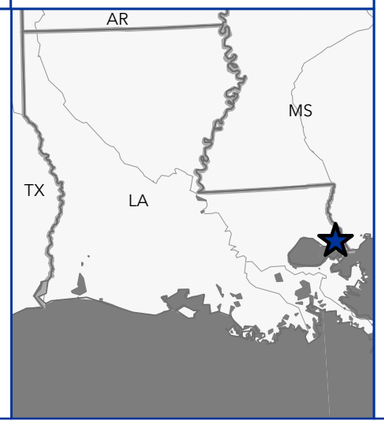

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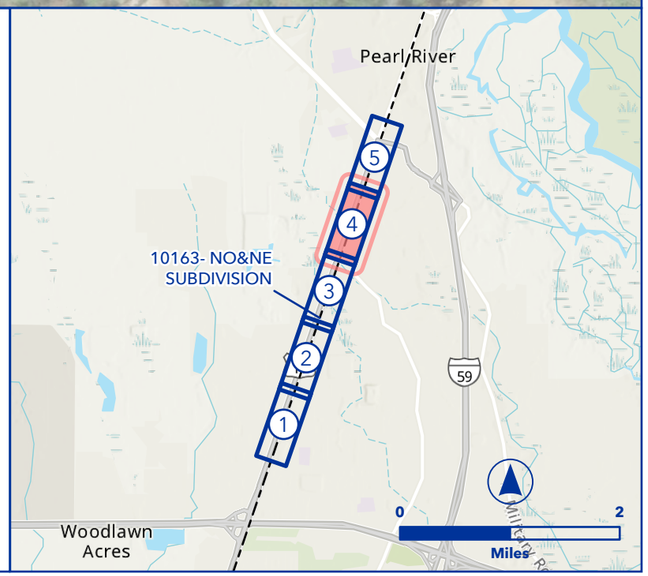

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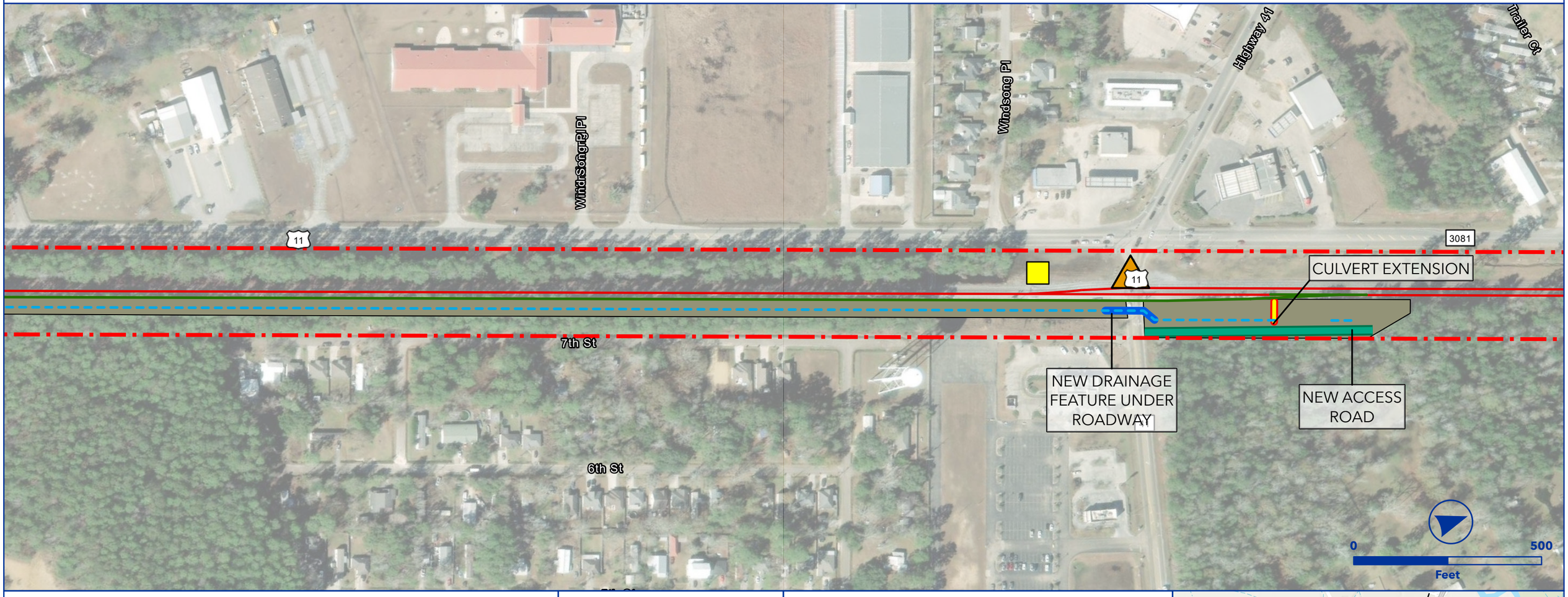

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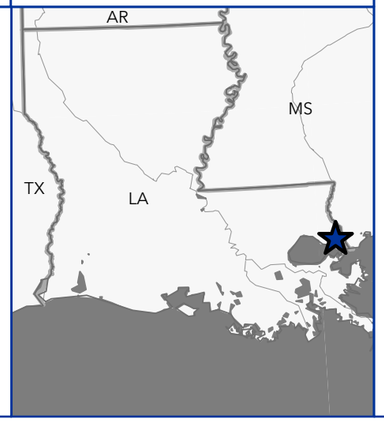

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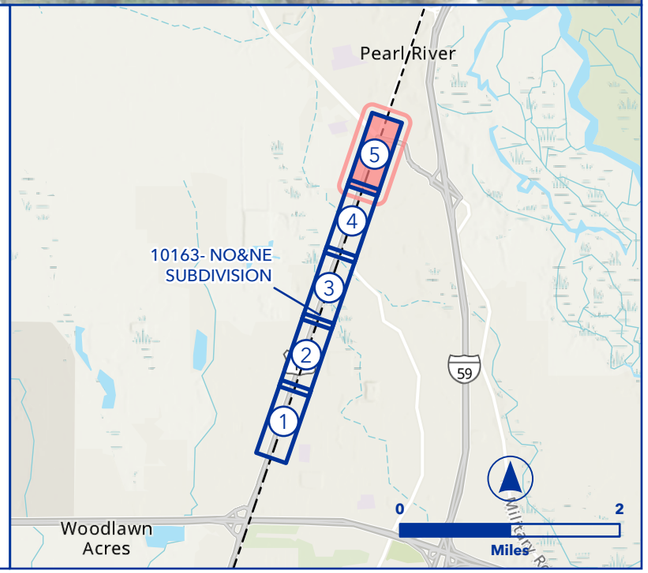

Attachment 2: Questionnaire

Louisiana Office of Cultural Development, Division of Historic Preservation

RE: Docket No. FD 36873, Union Pacific Corporation and Union Pacific Railroad Company – Control – Norfolk Southern Corporation and Norfolk Southern Railway Company; Section 106 Consultation

Please check all the appropriate response(s) that apply from the list below and use the back of this form or additional sheets if you wish to make comments:

_____ We have no interest in the Transaction and further consultation with our agency/Tribe is not necessary.

_____ We want to continue to receive information about the Transaction by mail and participate in the public involvement process for the EIS.

_____ We have an interest in the Transaction and want to participate as a Consulting Party in the Section 106 process.

Name of the Louisiana Office of Cultural Development, Division of Historic Preservation designated contact (please print):

_____ Phone: _____

E-mail: _____

Signed: _____ Date: _____

Please mail to: Alan Tabachnick
Surface Transportation Board
Docket No. FD 36873
395 E Street SW
Washington, DC 20423

Or Email to: alan.tabachnick@stb.gov