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Surface Transportation Board
395 E Street SW
Washington, DC 20423

Re: Union Pacific Corporation—Control—Norfolk Southern Corporation, Docket No. FD 36873
Dear Chair and Members of the Surface Transportation Board:

We the undersigned local elected officials in Allegheny County, Pennsylvania, respectfully submit the following comments on the proposed Union Pacific-Norfolk Southern merger. The above-referenced merger poses potentially profound negative impacts for Allegheny County residents' safety, health, well-being, and environment. Allegheny County includes the City of Pittsburgh and has a high population density, with more than 1.25 million residents.1 Commercial rail lines in our county are already heavily travelled, often with hazardous cargo. Within Allegheny County, two-thirds of the population live within one mile of rail lines.2 The expected increase in hazardous traffic presents a danger to our residents. We are situated on one of the busiest links in Norfolk Southern's network, running between Chicago and major intermodal terminals on the Eastern seaboard. In fact, an estimated 28 percent of Norfolk Southern's total chemical shipments travel on this route.3

The four-year anniversary of Norfolk Southern's East Palestine trail derailment and hazmat chemical disaster is but a few months away. Combined with the fact that Union Pacific has the highest rate of derailments for all Class I railroads, this merger raises significant concern for our communities.4

At the same time, Norfolk Southern is responsible for 111 rail bridges in Allegheny County, the conditions of which are a serious concern. An independent analysis of 20 rail bridges in Allegheny County 5 found that only one was in satisfactory condition, while 11 of the 20 were in poor or serious condition. Eight were rated as being in only fair condition. The deteriorated condition of Norfolk Southern's rail bridges puts our population at risk.

As noted in the merger filings, there are several rail lines in Allegheny County that will experience significant air quality impacts due to proposed increased train car traffic. Many of these communities are already designated by the Commonwealth of Pennsylvania as bearing a disproportionate pollution and health burden.6

The cumulative environmental and health consequences of additional train traffic near homes, schools, parks, and commercial districts along those segments are cause for concern. Allegheny County is already classified as nonattainment for ozone and fine particle pollution, known as PM 2.5, under the Clean Air Act.7 Increased air pollution from higher numbers of diesel-powered trains, without further capital improvements or electrification efforts, will compound this problem.

To ensure clean air and public safety from potential disastrous chemical derailments and accidents like that in East Palestine, we call on the following additions to be made to any final merger between Union Pacific and Norfolk Southern in order to protect the public interest:

- The companies involved should be required to reroute trains carrying hazardous material away from populated areas;
- They should be required to notify first responders and the public about trains coming through their communities and the materials they're transporting;
- Union Pacific and Norfolk Southern should be subject to greater levels of inspections and oversight to avoid accidents and protect the public;

- Union Pacific and Norfolk Southern should be required to be properly insured to cover the cost of a train disaster and safety violation fines.
- Both companies should be required to repair all dilapidated bridges to satisfactory or better standard prior to completion of this merger;
- The use of electric trucks at railyards and the use of electric locomotives in the region should be required in order to reduce air pollution.

We also request that the STB hold a public meeting about the merger in Southwestern Pennsylvania. Thank you for the opportunity to comment on this proposed transaction.

Sincerely,

[list of signers here]

JORDAN BOTTA - DISTRICT 13

Jordan Botta

1. United States Census Bureau, "Quick Facts."
2. Matt Kelso, "On the Wrong Track: Risks to Residents of the Upper Ohio River Valley From Railroad Incidents," December 14, 2023.
3. Jeff Stagl, "Norfolk Southern Pours Capital, Sweat Equity into its New Premier Corridor," Progressive Railroading, August 2016.
4. U.S. Senator Maria Cantwell, U.S. Senate Committee on Commerce, Science, & Transportation, press release, July 25, 2024.
5. The David R. Schmidt Company, Inc., "Metropolitan Pittsburgh 2024 Safety & Cursory Inspection Report of Norfolk Southern and Feeder Railroad Bridges," November 26, 2024.
6. Commonwealth of Pennsylvania, Department of Environmental Protection, Penn Enviro Screen tool.
7. U.S. Environmental Protection Agency, Green Book, "Pennsylvania Nonattainment/ Maintenance Status for Each County by Year for All Criteria Pollutants"