

WHAT UP SAYS vs. WHAT UP FILED

Union Pacific's public narrative versus its regulatory filings — STB Docket FD 36873

Union Pacific's public messaging about its proposed acquisition of Norfolk Southern diverges sharply from its own regulatory filings. A side-by-side review — particularly as it relates to Houston — tells the real story.

WHAT UP SAYS

WHAT UP FILED

CLAIM 1

"Union Pacific's average train length is 7,500 feet."

*Raquel Espinoza, Senior Director, UP Public Affairs
Texas House Committee on Transportation, April 3, 2025*

UP's own SEC disclosures show average train lengths far exceeding that figure throughout 2025:

1Q 2025:	9,490 feet
2Q 2025:	9,689 feet
3Q 2025:	9,801 feet
4Q 2025:	9,729 feet

Source: Quarterly earnings reports; SEC filings

WHY IT MATTERS FOR HOUSTON:

Longer trains mean longer blockages, longer delays for emergency vehicles, and greater strain on communities already burdened by rail congestion.

CLAIM 2

"The merger will deliver local economic growth, job creation, and reduced highway congestion — a win for our city's economy, our environment, and millions of Texans."

UP-affiliated PR firm-generated form letter attributed to local, state, and federal elected officials

UP's merger filing projects a 209.8% increase in daily truck traffic at Houston's Settegast Yard by Year 5:

Today:	246 trucks/day
Year 5 post-merger:	762 trucks/day
Net increase:	+516 freight trucks every day

Among thousands of intermodal facilities nationwide, Settegast would see the fifth-highest projected truck traffic increase.

Source: Merger Filing EI-34157, p. 18

WHY IT MATTERS FOR HOUSTON:

Rather than reducing congestion, the merger concentrates freight truck traffic in East Houston neighborhoods already overburdened by industrial activity.

CLAIM 3

"The merger improves safety, reduces emissions, and eases congestion by shifting freight from trucks to rail."

UP-NS Merger Application

The application's claimed benefits rely on intermodal lanes routed through major metros — where containers are transferred back to trucks at terminals like Settegast. A third-party rail consultant warns:

"While this is a 'green' alternative on a macro scale, it creates severe localized environmental impacts. Consolidating millions of truck movements into a handful of urban intermodal terminals will create localized congestion and air quality 'hot spots.' Because these negative consequences are technically caused by the IMC partners, not UPNS, they have been excluded from the Application's Environmental Impact Statement. They must be addressed."

Source: Merger Filing EI-310718, p. 4 — Atlantic Systems Inc.

WHY IT MATTERS FOR HOUSTON:

Environmental and congestion impacts are shifted — not eliminated — and disproportionately imposed on urban neighborhoods, while being omitted from formal environmental review.

CLAIM 4

"The merger includes \$2.1 billion in capital investments to support projected traffic growth."

STB Docket FD 36873, Filing 310577 — UP-NS Merger Application, Vol. II, p. 188

Despite the headline figure, Houston's share is narrow:

- Houston receives ZERO main line capacity improvements, even as merger projections show increased train volumes through the city.
- Houston-area investment is concentrated almost entirely at Settegast Yard — consisting mainly of two additional 6,000-foot tracks and added parking stalls.

Source: STB Docket FD 36873, Filing 310577 — UP-NS Merger Application, Vol. II, p. 791

WHY IT MATTERS FOR HOUSTON:

The merger intensifies traffic through one of the nation's busiest rail chokepoints without meaningfully expanding rail system capacity.

CLAIM 5

"Houston will see fewer trains after the merger."

Statements from multiple Houston City Council members

The UP-NS application projects substantial increases in train volumes on major Houston corridors by Year 5:

Lafayette Sub (MP 353–327.7):	+36.7%
Houston Sub (Tower 87, MP 353–356):	+36.8%

The Lafayette Sub becomes the Houston Sub at Tower 87. Trains through Houston's East End wait for clearance at Towers 26 and 87 — delays stretching minutes to hours, blocking grade crossings. More traffic means more blockages.

Source: STB Docket FD 36873, Filing EI-34153

WHY IT MATTERS FOR HOUSTON:

Increasing traffic at those towers will further exacerbate the East End's blocked crossing problem.

CLAIM 6

"The merger is expected to generate local economic growth through increased freight efficiency."

UP-affiliated PR firm-generated form letter attributed to local, state, and federal elected officials

UP's own Operational Plan identified Houston as the hub of a corridor expected to see increased rail traffic — and acknowledged:

"Applicants recognize that this increased traffic, and other operational changes, may result in additional blocked crossings."

Source: STB Docket FD 36873, Filing EI-34160

WHY IT MATTERS FOR HOUSTON:

UP's filings acknowledge the blocked crossing problem directly — while its public messaging promises economic benefits with no mention of this cost.

THE BOTTOM LINE

East End neighborhoods already bear the region's heaviest rail burden. The merger intensifies that load — longer trains, more trucks, more blocked crossings — while offering little meaningful capacity relief. The public narrative promises efficiency and environmental gains. The filings tell a story of concentrated impacts, deferred accountability, and communities left to absorb the consequences.