

BEFORE THE SURFACE TRANSPORTATION BOARD

DOCKET NO. FD 36873

UNION PACIFIC CORP., ET AL. — CONTROL — NORFOLK SOUTHERN CORP., ET AL.

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Public Record

EXECUTIVE SUMMARY AND OPERATIONAL NARRATIVE OF COLIN FINNEY, INDIVIDUAL PARTY OF RECORD

I. PURPOSE OF THE FILING

This submission serves as the formal Executive Summary and Operational Narrative for the April 30th filing. It integrates the *Petition for the Imposition of Conditions* and the *Passenger Coexistence Model* into a unified vision for a 15 county regional rail restoration. Recognizing that Norfolk Southern maintains a regional monopoly in the Lehigh Valley, this narrative provides a definitive roadmap for how rail consolidation can serve the public interest by "Infrastructure Recycling" underutilized freight assets into a high capacity transit spine.

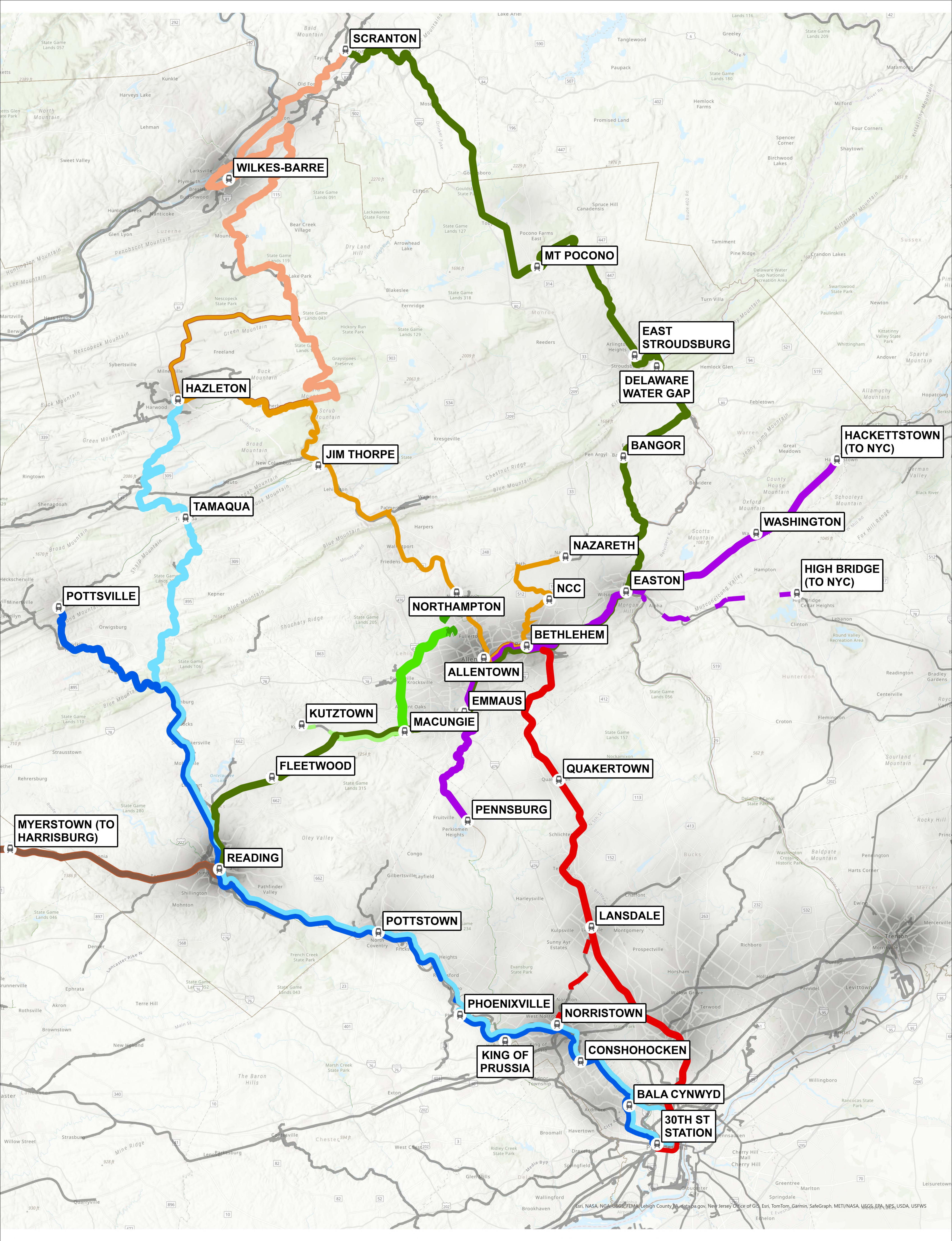
II. SUMMARY OF TECHNICAL CONTRIBUTIONS TO DATE

1. Infrastructure Derisking Model: A foundational component of this intervention is the proposal to transition the Lehigh and Reading Lines toward a Public Private Stewardship Framework. By shifting these corridors from private freight liabilities to public transit assets, we establish a mechanism where infrastructure maintenance is decoupled from freight profitability.

2. The Atlantic City Model Implementation: This model provides a template where public entities (e.g., PennDOT or NJ Transit) assume Maintenance of Way (MOW) and liability responsibilities. In this framework, Norfolk Southern retains exclusive freight rights but is relieved of the tax and maintenance burdens of the underlying right-of-way.

3. Engineering Baseline: Technical exhibits have identified the Dixon Street bottleneck and Allentown Terminal saturation as critical failure points. To satisfy the fair mandate the Board must condition approval on the implementation of universal crossover modernization and signaling upgrades. These improvements are engineered to provide a net benefit to freight fluidity, transforming passenger integration into an infrastructure catalyst.

4. Fair Mandate & Highway Mitigation: This proceeding has established a documented personal and regional necessity for rail alternatives. As the US-22 and I-78 corridors reach peak hour saturation, the LVT System offers the only viable competitive relief strategy. By diverting commuter volume to recycled rail corridors, the Board can mitigate the public burden of highway widening while providing essential mobility



Proposed Lehigh Valley Transit System

Schuylkill River Line

Hackettstown Line

Lehigh Main Line

Center Valley Line

Lackawanna Main Line

Blue Mountain Line

Population Density

Sparse

Dense

●

EXISTING
FREIGHT RAIL

OPTIMAL
PASSENGER
EXTENSION

ABANDONED
CORRIDOR

RAIL TRAILS

—

Existing Freight

Passenger
Extension

EXECUTIVE SUMMARY

This proposal outlines the comprehensive restoration of passenger rail service across a 15 county region, providing a high capacity alternative to the increasingly congested I-78 and US-22 corridors. By recycling existing infrastructure to revitalize underutilized freight corridors and abandoned rights of way, the Lehigh Valley Transit (LVT) System sets up a sustainable, scalable transit spine connecting major economic hubs from Scranton and Wilkes-Barre to Philadelphia and New York City.

1. STRATEGIC PASSENGER FREIGHT COEXISTENCE

The LVT System is designed around a shared use philosophy that respects the operational integrity of Class I carrier Norfolk Southern (NS).

- Operational Alignment: The plan adopts Norfolk Southern's established passenger principles which prioritize the maintenance of freight capacity and the separation of high speed passenger movements from heavy freight switching.
- Capacity Expansion: LVT investment would include capital improvements (e.g., universal crossovers and modernized signaling) that provide a net benefit to freight fluidity, turning passenger service into an infrastructure upgrade for NS rather than a liability.

2. INDEPENDENT CORRIDOR INTEGRATION

Unlike traditional commuter rail that relies on active freight trackage, the LVT's "Optimal Passenger Extensions" are designed as independent transitways.

- Corridor Independence: By using abandoned rail corridors and utility rights of way (such as high voltage electric transmission and pipeline paths), the system avoids the bottlenecking typical of shared track environments.
- Infrastructure Recycling: This approach repurposes precleared, low grade rights-of-way that have already undergone historical grading. This minimizes environmental impact and simplifies the fair mandate by bypassing the complex legal and operational hurdles associated with active freight mainlines.

3. COMPARATIVE COST ADVANTAGE

Restoring the LVT network offers a significantly higher return on investment than traditional highway expansion projects currently planned for the region.

- Highway Expansion Costs: Modern highway widenings, such as those projected for US-22 and I-78, often exceed \$100 million per mile when accounting for land acquisition and interchange reconstruction.
- Rail Restoration Efficiency: By recycling existing ballast and using state owned or empty industrial parcels, the LVT system can be implemented at a fraction of highway costs.
- Fair Mandate Congestion Mitigation: The system provides competitive for the PA-309 x US-22 interchange, diverting thousands of daily commuters onto the Center Valley and Lehigh Main lines, thereby extending the lifespan of existing road infrastructure without billion dollar tax burdens.

4. SCALABILITY AND INFRASTRUCTURE RECYCLING

The network is built for phased growth, allowing for immediate regional impact with long term best expansion capability.

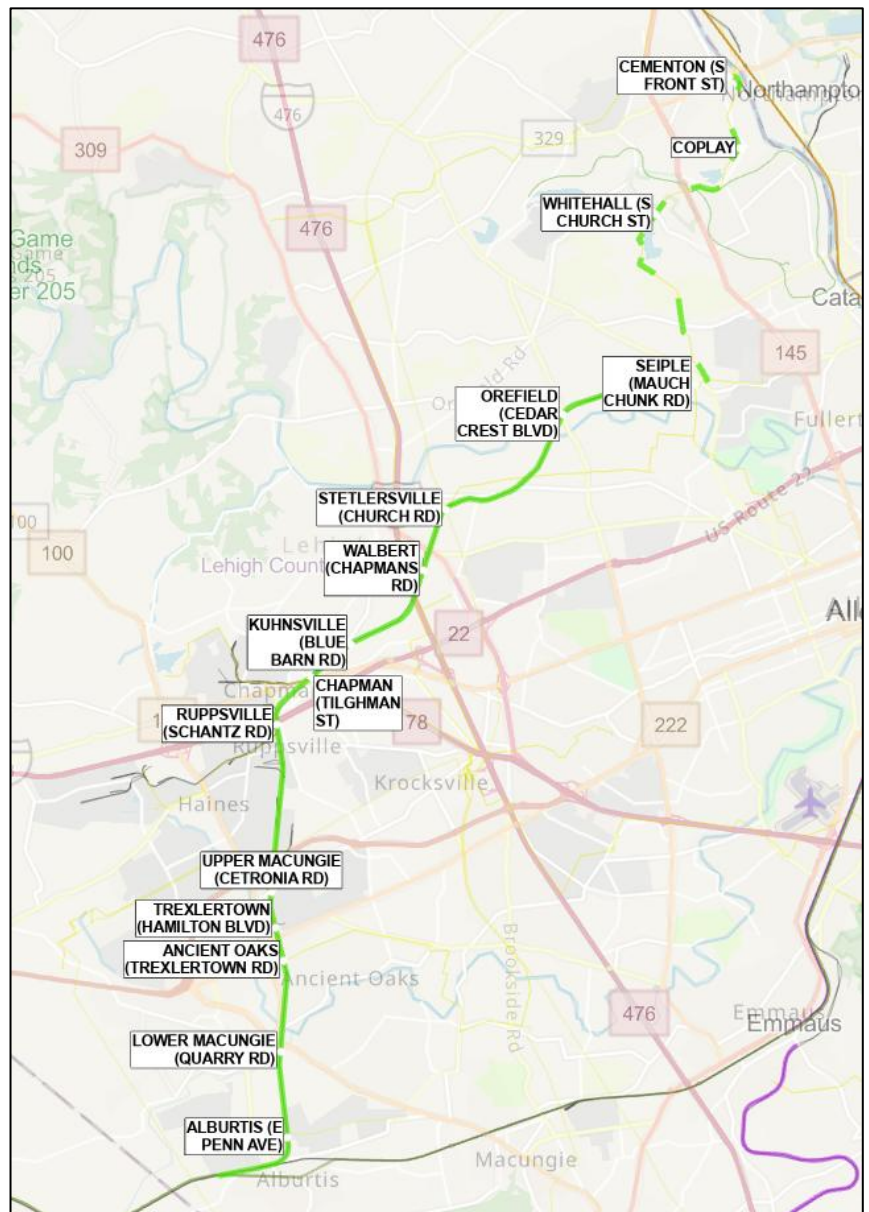
- Phase I: The Core Spine: First service uses existing Freight Rail corridors that are currently under capacity, connecting Allentown, Bethlehem, and Easton to the regional hubs.
- Phase II: Optimal Extensions: The plan promotes light rail extensions, such as the light green Seiple-to-Macungie corridor, which use abandoned corridors and utility rights-of-way to reach residential density centers like Wescosville and Trexlertown. By showing a heavy rail spine first, the system builds an immediate ridership base and proves regional demand, creating the necessary transit oriented momentum to justify and sustain these secondary light rail connections. Furthermore, Bus Rapid Transit (BRT) serves as the final multimodal layer, providing high frequency, flexible last mile connectivity to transit adjacent neighborhoods and commercial parks that sit outside the immediate rail footprint.
- Phase III: Regional BRT & Logistics Integration: This final phase achieves full Bus Rapid Transit (BRT) integration, creating a high capacity link between the Lehigh Valley's arterial road network and fixed transit nodes. By establishing dedicated BRT corridors that link rail stations directly to major warehouse clusters and industrial parks, the system effectively solves the last mile challenge while providing a critical operational buffer for Norfolk Southern. This strategy ensures passenger activity stays separated from active freight leads and switching zones, allowing Class I carriers to support maximum fluid throughput in high volume logistics districts without the safety or scheduling conflicts of localized transit stops. Furthermore, by diverting workforce commuters to BRT, the system removes commuter vehicle congestion from industrial access roads, improving truck turnaround times and overall logistical fluidity.
- Phase IV: Dual Mode Bus-on-Rails Development: To maximize infrastructure recycling in segments lacking heavy rail trackage, such as abandoned spurs, utility easements, or rail-trail corridors, Phase IV introduces Dual Mode Vehicles. This technology allows specialized transit vehicles to transition seamlessly between existing road networks and repurposed rail corridors, providing a low cost solution to bypassing congested surface arteries like MacArthur Road. By using the pregraded footprints of the region's historical industrial spurs, this dual mode approach drastically reduces the first capital investment needed for dedicated light rail rolling stock and electrification. This phase serves as the ultimate regional relief valve, bridging the gap between isolated neighborhoods and the primary rail spine without the billion-dollar price tag of traditional highway expansion.

5. REPURPOSING HISTORICAL QUARRY SPURS FOR MODERN LIGHT RAIL

The restoration of the Lehigh Valley Transit (LVT) system utilizes a strategy of extreme capital efficiency by "infrastructure recycling" the region's dense network of historical industrial spurs. This approach dramatically lowers the entry cost for high capacity transit by redeveloping existing extraction routes and underutilized utility rights of way into a modernized public transport spine.

I. Redeveloping the Extraction Legacy

- **Historical Infrastructure Utilization:** The primary Light Green light rail spine reuses the existing Alburdis-to-Seiple (Mauch Chunk Rd) footprint, following the exact geometry of historical quarry and cement extraction routes.
- **Minimal Grading Costs:** Because these corridors were originally engineered for heavy industrial extraction, they already possess the necessary low-grade profiles and wide rights-of-way needed for modern rail from Alburdis through Walbert.
- **Industrial Synergy:** By repurposing these underutilized spurs, the LVT system bypasses the astronomical costs of eminent domain and new greenfield construction for the southern and central segments of the line.



II. Low Cost Heavy Rail Revitalization

- **The High Capacity Anchor:** Establishing a low-cost heavy rail spine on existing Class I freight corridors provides the regional scale needed to revitalize secondary light rail feeders.
- **Leveraging Public Investment:** The proposed Atlantic City Stewardship Model allows for major infrastructure modernizations, such as bridge replacements and signal upgrades, to be funded through public grants rather than private debt.
- **Strategic Scaling:** This heavy rail foundation creates a consistent passenger flow that makes the redevelopment of local spurs—like the path through Stetlersville, Walbert, and Kuhnsville—economically sustainable.

III. Massive Expansion of Public Transport Access

- **Neighborhood Intercepts:** By electrifying these historical industrial paths, the system reaches deep into residential density centers like Ancient Oaks, Ruppsville, and Lower Macungie.
- **Utility Corridor Integration:** North of Seiple (Mauch Chunk Rd), the system achieves a critical extension to Cementon by utilizing a high-voltage transmission line utility corridor, allowing for rapid construction without residential eminent domain.
- **Landmark Connectivity:** This dual-use strategy provides direct, car-free access to major regional hubs, including Parkland High School, the booming warehouse industry in Upper Macungie, and the Cementon riverfront.

Conclusion

The Lehigh Valley Transit (LVT) system is not merely a transit project; it is a comprehensive regional resilience strategy designed to future proof the 15 county region against the escalating economic and environmental costs of highway congestion. By leveraging independent, recycled assets and existing public footprints, this multimodal network delivers a world class transit solution that outpaces traditional highway expansion in implementation speed, capital efficiency, and long term community impact. The phased integration, transitioning from a high capacity heavy rail spine to targeted light rail extensions, like the Seiple-to-Macungie corridor and logistics focused BRT links, ensures that the region remains a competitive engine of growth while strictly respecting the operational fluidity of our respective freight partner Norfolk Southern. Ultimately, the LVT system provides a fair mandate for the valley, transforming historic industrial rights of way into a modern, scalable infrastructure that enhances regional mobility, supports the logistics workforce, and preserves the Lehigh Valley's position as a vital hub of interstate commerce.

CERTIFICATE OF SERVICE

I hereby certify that on this day, April 5, 2026, a copy of the foregoing document was served electronically upon all parties of record in Docket No. FD 36873.

Signed,
/s/ Colin Finney