



Borough of Middlesex
1200 Mountain Ave Middlesex Nj 08846

*Office of Mayor
Jack Mikolajczyk*

August 25, 2026

Ms. Elizabeth Webster
Surface Transportation Board
395 E Street SW
Washington, DC 20423

**BOROUGH OF MIDDLESEX
COUNTY OF MIDDLESEX, STATE OF NEW JERSEY
Re: Surface Transportation Board Docket No. FD 36873
Union Pacific Corporation and Union Pacific Railroad Company – Control – Norfolk
Southern Corporation and Norfolk Southern Railway Company
Preliminary Environmental Consultation Comments**

Dear Ms. Webster:

The Borough of Middlesex appreciates the opportunity to provide preliminary comments regarding the proposed acquisition of Norfolk Southern Corporation and Norfolk Southern Railway Company by Union Pacific Corporation and the resulting consolidation of the two railroad systems. We understand that the Surface Transportation Board's Office of Environmental Analysis is preparing an Environmental Impact Statement pursuant to the National Environmental Policy Act and is seeking information regarding environmental issues and resources that may be affected by the proposed transaction.

The Borough of Middlesex has significant concerns regarding the potential impacts of increased rail traffic through our community, particularly with respect to public safety, hazardous-material transportation, emergency response, air quality, noise, traffic congestion, and the potential environmental consequences of a derailment or collision.

According to the Board's preliminary consultation letter, the transaction could result in increases in rail traffic of at least 100 percent, or an increase of at least eight trains per day, on certain rail segments. The Borough believes that any substantial increase in freight rail traffic must be evaluated in the context of the existing physical conditions and safety history of the railroad corridor through Middlesex Borough.

Cedar Avenue Rail Crossings

Middlesex Borough is particularly concerned about the existing configuration of the Cedar Avenue rail crossings. Cedar Avenue contains two closely spaced grade crossings involving the New Jersey Transit Raritan Valley Line and the Conrail Lehigh Line. The crossings are approximately 125 feet apart and are located in close proximity to the Cedar Avenue/Lincoln Boulevard intersection.

This configuration creates a significant public safety concern. When traffic backs up at the nearby intersection, motorists can become trapped between the two separate railroad crossings. The close proximity of the two rail lines also creates the potential for a motor vehicle to occupy one crossing while a train is approaching on the other.

The seriousness of this concern is not theoretical. Middlesex Borough has experienced multiple serious incidents at or near the Cedar Avenue crossing, including fatal incidents. In January 2020, two women were killed when their vehicle was struck by a New Jersey Transit train at the crossing. Later that month, a pedestrian was struck and killed by a train in the same area. In February 2020, a New Jersey Transit train also struck a truck at the crossing. These incidents demonstrate the significant existing safety challenges associated with this location.

The New Jersey State Rail Plan has identified the grade separation of Cedar Avenue as a transportation priority and specifically recognizes the unique configuration of the two parallel railroad crossings. The Borough therefore believes that any analysis of the environmental and public safety consequences of increased rail traffic must specifically address the Cedar Avenue crossings and the potential effect of increased freight train frequency on this already hazardous location.

The Borough requests the closure of the buffer zone to eliminate the existing gap between the two railroad tracks. Closing this area would prevent vehicles from becoming stopped or trapped between the tracks while trains are approaching or passing. This safety improvement would reduce the potential for vehicle-train conflicts and help prevent future accidents associated with the railroad crossing.

Hazardous Materials and Environmental Consequences

The Borough is also deeply concerned about the potential increase in transportation of hazardous materials through Middlesex Borough. The rail network involved in this transaction serves industries that include chemical and petroleum-related businesses. An increase in freight traffic necessarily raises concerns regarding the frequency and potential consequences of incidents involving hazardous materials.

A derailment, collision, or other rail incident involving hazardous materials could result in the release of toxic, flammable, or otherwise dangerous substances into the surrounding environment. Such an incident could affect nearby residential neighborhoods, businesses, roadways, waterways, soil, groundwater, and public facilities.

The Borough requests that the Environmental Impact Statement evaluate not only the likelihood of increased hazardous-material movements but also the potential consequences of a derailment or collision involving hazardous materials in densely populated areas such as Middlesex. The analysis should identify the types and quantities of hazardous materials reasonably expected to be transported, the routes over which those materials would travel, and the potential consequences of a release.

The Borough also requests that the EIS consider the ability of local emergency responders to safely and effectively respond to a major rail incident involving hazardous materials. A significant derailment could require evacuation or shelter-in-place measures, closure of major roadways, deployment of specialized hazardous-material resources, and extended emergency operations.

Emergency Response and Evacuation

Increased rail traffic also has the potential to adversely affect emergency response throughout the Borough. Extended or more frequent railroad crossings can delay police, fire, emergency medical services, and other emergency response vehicles.

A major rail incident could simultaneously block roadways, disrupt rail service, impede emergency access, and require evacuation of nearby residents. These circumstances could be particularly challenging if an incident occurs at or near Cedar Avenue, where the existing configuration already creates traffic and access concerns.

The Borough requests that the EIS evaluate the effect of increased rail traffic on emergency response times, emergency access routes, evacuation routes, and the ability of local emergency services to respond to a significant rail accident or hazardous-material release.

Air Quality, Noise, and Quality of Life

An increase in freight trains would also have potential impacts on the quality of life of Middlesex residents. Increased locomotive activity may result in additional diesel emissions, particulate matter, idling emissions, noise, vibration, and nighttime disturbances.

The EIS should evaluate potential increases in locomotive emissions and their effects on nearby residential areas, particularly for residents living in close proximity to the rail corridor. The analysis should also consider the cumulative effect of increased train frequency, longer trains, idling locomotives, locomotive horns, crossing warning systems, and vibration.

These impacts should not be considered individually. The cumulative effect of increased freight rail operations on residents who already live near an active rail corridor should be evaluated as part of the environmental review.

Traffic and Community Impacts

Increased rail traffic will also increase the frequency and duration of roadway closures at grade crossings. This can result in increased traffic congestion, vehicle idling, delays to emergency responders, and motorists seeking alternate routes through residential neighborhoods.

The Borough is particularly concerned about the cumulative effect of increased freight train activity at the Cedar Avenue crossings and other nearby crossings along the Lehigh Line. Increased train frequency could exacerbate existing congestion and safety problems and further complicate emergency response.

The EIS should therefore evaluate projected increases in train frequency, train length, crossing closure times, roadway delays, emergency response impacts, and the potential for traffic to divert onto local residential streets.

Water, Soil, and Environmental Contamination

The Borough also requests that the EIS evaluate the potential impacts of a derailment or hazardous-material release on surface water, groundwater, wetlands, drainage systems, and soils.

A significant spill could migrate through stormwater infrastructure and drainage systems and potentially contaminate environmentally sensitive areas beyond the immediate railroad right-of-way. The EIS should identify environmentally sensitive resources located along the affected rail corridors and evaluate the potential consequences of a hazardous-material release in those areas. The analysis should also address the availability and adequacy of railroad emergency response resources, spill containment capabilities, environmental remediation procedures, and financial responsibility for cleanup following a significant release.

Cumulative and Long-Term Impacts

Finally, the Borough requests that the EIS evaluate the cumulative and long-term impacts of increased freight rail activity rather than considering each environmental issue independently.

Middlesex Borough is an established residential community with existing transportation infrastructure, a heavily utilized rail corridor, closely spaced grade crossings, and a documented history of serious rail-related incidents. Increasing rail traffic through this environment could compound existing safety, traffic, environmental, and quality-of-life concerns.

The Borough respectfully requests that the Surface Transportation Board's Environmental Impact Statement specifically address:

1. The projected increase in freight trains through Middlesex Borough, including train frequency and train length.
2. The types and quantities of hazardous materials expected to be transported through the Borough and the potential consequences of a release.
3. The potential for derailments, collisions, or other incidents involving hazardous materials.
4. The existing safety conditions at the Cedar Avenue grade crossings and the potential impact of substantially increased freight traffic at this location.
5. The potential for increased train traffic to worsen roadway congestion, vehicle queuing, and the risk of motorists becoming trapped between the two closely spaced Cedar Avenue crossings.

6. Impacts on emergency response times, emergency access, evacuation routes, and the ability of local police, fire, EMS, and hazardous-material response agencies to respond to a major rail incident.
7. Potential impacts to air quality, including diesel emissions and particulate matter.
8. Increased railroad noise, locomotive horn activity, vibration, and nighttime disturbances.
9. Potential impacts to surface water, groundwater, stormwater systems, wetlands, soils, and other environmental resources in the event of a derailment or hazardous-material release.
10. The cumulative impacts of increased freight rail traffic on Middlesex Borough and surrounding communities.
11. The adequacy of existing railroad infrastructure, grade crossings, warning systems, emergency access, and safety measures to accommodate the projected increase in rail traffic.
12. Potential mitigation measures, including grade separation at Cedar Avenue, improvements to grade-crossing safety, enhanced emergency response coordination, hazardous-material response planning, improved notification systems, and appropriate railroad funding or financial commitments to address impacts associated with increased rail activity.

Local Emergency Response and Community Exposure

Middlesex Borough is a densely developed residential community with homes, businesses, public facilities, and transportation infrastructure located in close proximity to the railroad corridor. The Borough's police, fire, emergency medical services, and Office of Emergency Management would be among the first responders required to manage a major railroad incident. A derailment or hazardous-material release could require immediate coordination among multiple local, county, state, and federal agencies, while simultaneously creating significant demands for evacuation, traffic control, medical response, fire suppression, hazardous-material mitigation, and public notification. Increased rail traffic will inherently increase the frequency with which emergency responders may be confronted with these potential hazards. The Borough therefore believes the EIS should evaluate whether existing emergency response capabilities, equipment, training, communications, and mutual-aid resources are adequate to address the increased risk associated with substantially greater freight rail activity and should identify appropriate mitigation measures to ensure that local communities are not left to bear the increased public safety and emergency response burden resulting from the transaction.

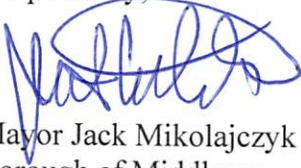
The Borough of Middlesex recognizes the importance of a safe and efficient national freight transportation system. However, any benefits associated with the proposed transaction must be balanced against the potential environmental and public safety impacts on communities through which the increased rail traffic will travel.

Given Middlesex Borough's existing rail infrastructure, history of serious and fatal incidents, proximity of residential areas to the railroad, and the unique and hazardous configuration of the Cedar Avenue crossings, we believe the Borough warrants particular consideration during the Environmental Impact Statement process.

We respectfully request that the Surface Transportation Board and its Office of Environmental Analysis give these concerns full consideration and incorporate the issues identified above into the scope and analysis of the Environmental Impact Statement.

Thank you for the opportunity to provide these preliminary comments. The Borough of Middlesex looks forward to participating in the environmental review process and would welcome the opportunity to provide additional information regarding local conditions, emergency response capabilities, transportation infrastructure, and the safety history of the railroad corridor.

Respectfully,

A handwritten signature in blue ink, appearing to read "Jack Mikolajczyk", is written over the word "Respectfully,".

Mayor Jack Mikolajczyk
Borough of Middlesex