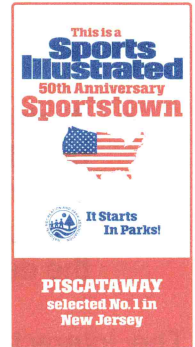




MUNICIPAL COMPLEX • PISCATAWAY, N.J. 08854

TOWNSHIP OF PISCATAWAY

September 18, 2026



Danielle Gosselin, Director
Office of Environmental Analysis
Surface Transportation Board (Docket No. FD 36873)
395 E Street SW
Washington, DC 20423

RE: Docket No. FD 36873

Union Pacific Corporation and Union Pacific Company – Control – Norfolk Southern Corporation and Norfolk Southern Railway Company; Preliminary Consultation

Dear Ms. Gosselin:

The Township of Piscataway appreciates the opportunity to submit comments on environmental issues and/or concerns associated with the proposed merger of Union Pacific (UP) and Norfolk Southern (NS). Please note that the Township intends to separately submit comments to the overall docket on this proposed merger.

Piscataway is a township of 64,000 residents located 40 miles southwest of New York City covering 18.96 square miles in Middlesex County, New Jersey.

At the broadest level, the Township urges the Board (in both the environmental analysis and in the overall evaluation of the merger) to conduct a comprehensive review and analysis of the proposed merger that addresses all its potential impacts on the communities that host UP and NS infrastructure. Should the Board eventually approve this merger, the Township urges the Board to identify concrete and enforceable mitigation measures to address negative impacts identified by the Board's review and analysis.

Impacts that the Township urges the Board to review and analyze include but are not limited to air quality, noise, mobility, safety, and emergency response operations and response times. The Township also requests that the Board evaluate the transportation of hazardous waste by the proposed merged railroad and its potential impact on communities, including strong community right to know provisions that allow local officials and first responders to prepare for potential incidents.

Two lines of Conrail's North Jersey Shared Assets Division, which are majority owned by NS, run through Piscataway:

- A single-track section of the Port Reading Secondary, which runs east-west across the breadth of Piscataway parallel to I-287, and serves several commercial, industrial, and warehouse properties, and
- A double-track section of the Lehigh Line, which runs east-west along Bound Brook through the densely populated New Market section of Piscataway.

The interactive map on STB's Environmental Impact Statement (EIS) website for the proposed merger identifies both lines as "*segments that exceed the Board's thresholds for air quality analysis.*" The Township therefore anticipates that the EIS will evaluate the air quality impacts of the merger on Piscataway, particularly those of the Lehigh Line, which runs through a densely populated neighborhood and directly adjacent to Columbus Park, the primary municipal park serving residents of the New Market section of Piscataway. Columbus Park is a heavily used park that includes Columbus Park lake, walking trails, baseball fields, pickleball courts, and a handball court.

In addition, the Township would note that the two lines that run through Piscataway include 7 grade crossings.

The Port Reading Secondary has grade crossings at:

- New Brunswick Avenue,
- Stelton Road, and
- Baekeland Avenue.

The Lehigh Line has grade crossings at:

- New Brunswick Avenue,
- New Market Road,
- Prospect Avenue, and
- South Avenue.

The Township is particularly concerned about the impacts of the proposed merger on the grade crossings of the double-track Lehigh Line with New Market Road and Prospect Avenue. Both grade crossings are in densely populated, mixed-use neighborhoods with heavy vehicle and pedestrian traffic. Both grade crossings lack sidewalks, creating a gap in an otherwise comprehensive network and posing mobility and safety challenges for pedestrians, especially for those with limited mobility. The grade crossing on New Market Road is of particular concern, as it is located directly next to the main entrance of Columbus Park and at the main access point to the popular gazebo on Columbus Park Lake.

Please contact Dana Korbman (dkorbman@piscatawaynj.org) if you have any questions or would like additional information about how this merger might impact the Township of Piscataway.

Sincerely,



Brian C. Wahler
Mayor