



FRANKLIN COUNTY DEPARTMENT OF EMERGENCY SERVICES

390 New York Avenue

Chambersburg, PA 17201-7883

Phone: 717-264-2813

Fax: 717-267-2813

Acting Director: John Thierwechter

Assistant Director: Jacob B. Stoner

September 17, 2026

RE: Docket No. FD 36873, Union Pacific Corporation and Union Pacific Company - Control - Norfolk Southern Corporation and Norfolk Southern Railway Company; Preliminary Consultation

In reviewing communications from The Surface Transportation Board regarding a proposed merger between Union Pacific and Norfolk Southern, it was determined that Franklin County will indeed be impacted by the proposed merger if it is approved. While no capital improvements are currently proposed for Franklin County, it is anticipated that the Norfolk Southern Intermodal Facility in Antrim Township will see operational changes that would exceed the Surface Transportation Board's environmental analysis thresholds. Per the notification, *"the thresholds for assessing environmental impacts from increased activity at rail facilities, including rail yards and intermodal facilities, in railroad acquisition proceedings are an increase in rail yard activity of at least 100% (measured by carload activity) or an average increase in truck traffic of more than 10% of the average daily traffic or 50 vehicles a day on any affected road segment. 49 C.F.R. § 1105.7(e)(5)(i)(B), (C)."*

Known impacts of the merger include:

- Changes in operations (e.g., an increase in average trains per day) on certain segments of the combined rail network
 - Impacts Franklin County
 - It is anticipated that there will be an increase of 1 or more Hazardous Material Carload per Day along the N/S line that crosses the county.
 - No projections have been provided.
- Changes in activity at some rail yards and intermodal facilities
 - Impacts Franklin County
 - The increase in activity is anticipated to be at least 100% (measured by carload activity) or an average increase in truck traffic of more than 10% of the average daily traffic or 50 vehicles per day on any affected road segment.
 - No projections have been provided.
- Capital improvements to increase capacity

- Does not impact Franklin County

Based on these generalized impacts, Franklin County **could** expect the following environmental impacts upon approval of the merger:

- An increase in at-grade crossing blockages and train bottlenecks along the Norfolk Southern line. This is already an issue along the Norfolk Southern line on Orchard Drive in the Borough of Chambersburg and Kriner Road in Guilford Township, so these delays will likely occur more often and negatively impact both residents and first responders.
- Increased truck traffic near the Norfolk Southern Intermodal Facility off Exit 3 in Antrim Township as well as along the 81 corridor through the county.
- While the project doesn't appear to trigger minimum thresholds for air quality, there will be increased vehicle emissions due to the increased truck and train traffic within the county.
- Increased traffic and delays near the TA Truck Stop at Exit 5 in Antrim Township. The existing infrastructure at this exit is already deficient. The increased trucks at the truck stop would further degrade the local air quality.
- An increased environmental risk of Hazardous Materials incidents along the entire I-81 corridor for both trucks and rail cars within Franklin County. First responders and trained HazMat personnel are already facing staffing and funding shortages, and the increase in incidents would further strain resources.

With the general information provided to date, it is difficult to project the true environmental impacts to Franklin County and its residents. Any impacts due to the proposed changes to the existing operations and changes in activity at the NS Intermodal Facility will likely have measurable negative impacts that should be further explored prior to moving forward with the merger. Due to the proposed changes in operations and activities and the environmental concerns noted above, the Franklin County Department of Emergency Services would urge the Surface Transportation Board to increase the scope of the environmental review for this project. This review would help to ensure that the potential impacts are addressed prior to approval of the proposed merger.