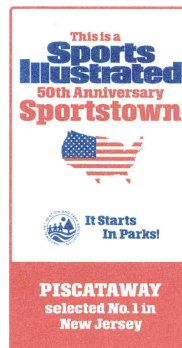




MUNICIPAL COMPLEX • PISCATAWAY, N.J. 08854

# 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 Railroad 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. The Township has filed a Notice of Intent to Participate as a Party of Record and asks that this letter be made part of the record in Finance Docket No. 36873.

Piscataway is a township of approximately 62,000 residents located approximately 30 miles southwest of New York City and 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.

The Board has stated that it will not require mitigation for existing conditions and existing railroad operations. See 49 C.F.R. § 1180.1(f)(1). The Township therefore asks that the EIS set out, for each line segment in Piscataway, both the pre-transaction baseline and the projected post-transaction condition, stated in trains per day, train length, gross ton-

miles, time of day, and hazardous materials volumes, and that it analyze the change between the two. These figures should be drawn from Applicants' operating plan and density charts filed under 49 C.F.R. § 1180.8(b)(1) and (b)(5) rather than from system-wide averages.

Impacts that the Township urges the Board to review and analyze include but are not limited to air quality, noise and vibration, mobility, safety, and emergency response operations and response times. The Township also requests that the Board evaluate the transportation of hazardous materials 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 seven at-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.

The Township respectfully asks that the EIS address the following in particular: (i) the evidence Applicants must submit concerning potentially blocked grade crossings resulting from merger-related traffic increases or operational changes, 49 C.F.R. § 1180.1(f)(3)(ii), and the measures they plan to take to address those blockages, id. § 1180.8(a)(2), developed crossing by crossing for the seven crossings listed above rather than on a corridor-wide basis, including an estimate of the increase in gate-down time at each crossing that would result from longer and more frequent trains; (ii) the effect of those blockages on emergency response, including the fire, emergency medical, and police facilities whose service areas are divided by the two lines and the effect on response times to the neighborhoods beyond each line; (iii) noise and vibration along both lines, including wayside noise at homes and at Columbus Park and locomotive horn noise at the crossings listed above; (iv) the routing of hazardous materials under 49 C.F.R. § 172.820, the provision of real-time train consist information to local first responders, and the training and equipment municipal first responders would need to respond to an incident involving the merged carrier; (v) whether the neighborhoods along the two lines are designated overburdened communities under New Jersey's environmental justice law, N.J.S.A. 13:1D-157 et seq., and the implementing regulations and mapping of the New Jersey Department of Environmental Protection, Middlesex County also lying within a designated nonattainment area for ozone; (vi) the consequences of a derailment or release in the flood hazard areas, surface waters, and water supply resources near the corridor; (vii) the effect of merger-related traffic increases on passenger rail service in this corridor, including New Jersey Transit's Raritan Valley Line, see 49 C.F.R. § 1180.10(b); and (viii) how the transaction would affect traffic volumes and operations in the North Jersey Shared Assets Area, Conrail being subject to the Board's conditioning authority as an applicant carrier, see 49 C.F.R. § 1180.3(b). The Township will provide the U.S. DOT crossing inventory number, roadway classification, and average daily traffic volume for each of the seven crossings.

If the Board approves the transaction, the Township asks that any mitigation be specific to the affected locations, enforceable, and subject to reporting during the oversight period provided for in 49 C.F.R. § 1180.1(g). The Board has stated that it encourages voluntary agreements between applicants and affected communities and will generally impose them as conditions of approval, see 49 C.F.R. § 1180.1(f)(2), and the Township is prepared to discuss such an agreement with Applicants. The Township also asks to be added to the mailing and service lists for the environmental review, requests a public scoping meeting accessible to residents of central New Jersey, and requests consulting party status under 36 C.F.R. § 800.2(c)(3) as to any historic properties within the area of potential effects.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Brian C. Wahler". The signature is fluid and cursive, with the first name "Brian" and last name "Wahler" clearly distinguishable.

Brian C. Wahler  
Mayor