



UPPER DUBLIN T O W N S H I P

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September 21, 2026

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:

On behalf of Upper Dublin Township, Montgomery County, Pennsylvania, we appreciate the opportunity to provide preliminary comments regarding the proposed acquisition of Norfolk Southern Corporation and Norfolk Southern Railway Company by Union Pacific Corporation.

The Township has reviewed the preliminary consultation materials provided by the Surface Transportation Board. At this time, the Township does not have sufficient information to determine the specific impacts that the proposed transaction may have on Upper Dublin Township. However, Norfolk Southern's Trenton Cutoff passes through the Township, and the Township therefore has an interest in understanding how changes in rail operations associated with the proposed transaction may affect our community.

Accordingly, we respectfully request that the Environmental Impact Statement evaluate the potential impacts of the proposed transaction on Upper Dublin Township, including, but not limited to, the following:

- **Rail Traffic:** The potential for increases in the frequency, length, weight, or duration of freight trains operating through the Township and the resulting effects on the surrounding community.
- **Grade Crossings and Traffic:** The potential for increased rail activity to result in more frequent or prolonged closures of road crossings, resulting traffic delays, and impacts to the Township's transportation network.
- **Emergency Response:** The potential effect of increased rail traffic and crossing closures on emergency response times. In particular, the Township requests that the analysis consider whether increased train activity could impede the ability of police, fire, ambulance, and other emergency services to efficiently travel throughout the Township.
- **Public Safety:** The potential effects of increased rail activity on the safety of motorists, pedestrians, bicyclists, and other users of roadways and crossings intersecting the rail line.
- **Noise and Vibration:** Potential increases in noise and vibration associated with increased train frequency, train length, locomotive operations, idling, switching, and other changes in railroad activity, particularly for residential properties and other sensitive uses located near the rail line.
- **Air Quality:** Potential increases in locomotive emissions and other air-quality impacts resulting from changes in rail traffic, including locomotive idling.
- **Hazardous Materials:** The potential for changes in the volume, frequency, or types of hazardous materials transported through the Township, as well as the implications for local emergency preparedness and response capabilities.



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- **Infrastructure and Environmental Resources:** Any potential impacts to stormwater, drainage, streams, wetlands, floodplains, or other environmental resources resulting from improvements or changes to railroad infrastructure.
- **Natural Resource Management:** Upper Dublin Township currently has permission from Norfolk Southern to conduct natural resource management activities on Norfolk Southern-owned property within the Township. These activities are undertaken for the benefit of the surrounding community and the management and protection of natural resources. The Township requests that any existing permissions or agreements allowing the Township to conduct these activities be maintained and honored following the proposed transaction, regardless of any change in ownership or control of the affected property.

The Township also requests that the environmental review consider the **cumulative effects** of changes in rail activity, rather than evaluating individual operational or infrastructure changes in isolation.

At this preliminary stage, the Township is not taking a position regarding whether the proposed transaction should ultimately be approved. Rather, our comments are intended to ensure that the Environmental Impact Statement fully evaluates the potential effects of the transaction on communities such as Upper Dublin Township that contain existing Norfolk Southern infrastructure.

We appreciate the opportunity to participate in the preliminary consultation process and request that Upper Dublin Township be included in any future consultation or environmental review concerning potential impacts to the Township.

Please feel free to contact the Township should additional information or coordination be helpful as the environmental review proceeds.

Sincerely,

A blue ink signature of Kurt M. Ferguson, written in a cursive style.

Kurt M. Ferguson
Township Manager