



MONTGOMERY COUNTY BOARD OF COMMISSIONERS

Jamila H. Winder, Chair
Neil K. Makhija, Vice Chair
Thomas DiBello, Commissioner

Elizabeth Webster

September 21, 2026

Surface Transportation Board (Docket No. FD 36873)

395 E Street SW

Washington, DC 20423

Re: Proposed acquisition of Norfolk Southern Railway Company by Union Pacific Railroad Company

Dear Ms. Webster,

Montgomery County, Pennsylvania appreciates the opportunity to contribute comments to the Office of Environmental Analysis at the Surface Transportation Board regarding the proposed acquisition of Norfolk Southern Railway Company (NS) by Union Pacific Railroad Company (UPC) via docket number FD 36873. Montgomery County, as a jurisdiction with over 875,000 residents covering the northwest suburbs of Philadelphia, largely is served by Norfolk Southern railroads as the successor to the original Pennsylvania and Reading Railroad lines. As some of these railway corridors are now approaching two hundred years old, we are very familiar with the positives and negatives of having railroads operating throughout our county, from the passenger and freight connectivity and economic benefits to the environmental impacts from noise and diesel exhaust. We provide these comments in support of a thorough environmental review and examination of the merger transaction by the Surface Transportation Board, especially noting that no capital improvement locations to mitigate increased traffic from the railroad merger are currently proposed for the Commonwealth of Pennsylvania.

Montgomery County railways owned by Norfolk Southern have been identified by the STB's environmental data explorer map to have impacts exceeding the Board's thresholds along two separate corridors. Both corridors begin at the Norfolk Southern Abrams Yard facility in Upper Merion Township, which is expected to handle a 26% growth in carloads per day, exceeding the STB's thresholds. One corridor follows the Harrisburg Line (facility ID 10005) along the right (west) bank of the Schuylkill River from Abrams Yard into the city of Philadelphia, which will experience a 28% daily increase in hazardous material carloads per day and a 30% overall increase in carloads. The other corridor follows the Morrisville Line, also known as the Trenton Cut-off (facility ID 10006) across the Schuylkill River at Barbadoes Island and proceeds east across Montgomery County, largely paralleling the Pennsylvania Turnpike. This segment, which interacts with the Southeastern Pennsylvania Transportation Authority (SEPTA)'s Manayunk/Norristown Regional Rail Line service for approximately 6/10ths of a mile in downtown Norristown, is slated for a 152% increase in hazardous carloads and a 55% increase in carloads overall, and is labeled as exceeding the board's threshold for air quality analysis.

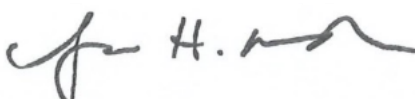
Montgomery County's comments regarding our facilities can be grouped into three broad categories, for future use by the STB as an environmental impact statement is developed:

1. The Morrisville Line's air quality threshold exceedance is slated to take place along dense population areas, including some with significant economic disadvantage, such as downtown Norristown, Plymouth Meeting, Fort Washington, and Willow Grove. Increased air pollution from higher numbers of diesel-powered trains on populations, businesses, and recreational facilities along the Morrisville Line corridor will lead to negative health impacts and degraded environmental outcomes for a large portion of Montgomery County without further capital improvements or electrification efforts. Additional scrutiny for air pollution mitigation should be recommended by the STB during the merger review process.
2. SEPTA's long-term regional rail master plan envisions greatly enhanced service on the Manayunk/Norristown Regional Rail line between Philadelphia and Norristown, featuring service as frequently as every 15 minutes. One of the key areas currently limiting the implementation of these service levels, as identified by SEPTA's planning efforts, is the sharing of railroad tracks between passenger and freight services for the 6/10ths of a mile between the Schuylkill River bridge, through the Norristown Transit Center, and east towards Ford Street in Norristown. While freight will likely still need to cross passenger service based on the overall alignment of train tracks in this heavily developed area, a consistent third track for freight and associated infrastructure improvements will allow both types of services to coexist successfully.
3. Montgomery County, along with our neighbors to the west in Berks and Chester County, are part of the Schuylkill River Passenger Rail Authority (SRPRA) and its efforts to reinstate passenger rail services between Philadelphia and points northwest beyond Norristown, including Phoenixville, Pottstown, and Reading. This corridor has been included in the FRA's Corridor ID program and is currently seeking entrance into Step 2 of the process, which will help determine which routing the services will proceed from Abrams Yard east to Philadelphia, either using the Morrisville Line and SEPTA-owned tracks or the Harrisburg Line. The SRPRA's efforts will require extensive negotiation and coordination with Norfolk Southern, including through areas where increased freight train traffic is already anticipated. We would ask that any environmental impact statements take into account proposed passenger rail services across the entire UP/NS service areas, including ours, and develop strategies for the merger to install appropriate capital improvements to mitigate environmental impacts and enable productive railway usage.

Montgomery County again appreciates the opportunity to provide comments on this important, proposed merger. We are happy to provide additional commentary and insights as requested; please contact our county's Planning Commission office if there are any questions regarding this submission. We wish the STB and its OEA a smooth and productive comment review process.

Sincerely,

Montgomery County Board of Commissioners



Jamila H. Winder, Chair



Neil K. Makhija, Vice-Chair



Thomas DiBello, Commissioner