

29 September 2026

Elizabeth Webster
Surface Transportation Board
395 E Street SW
Washington DC, 2023

Re: Docket No. FD 36873

The City of Philadelphia is submitting these preliminary comments on the scope of the environmental review of the proposed merger of Union Pacific and Norfolk Southern railroads. Philadelphia and surrounding region are largely served by Norfolk Southern railroads as the successor to the original Pennsylvania and Reading Railroad lines. The merger is poised to increase rail freight volumes and activity throughout metropolitan areas, including this region. The federal Surface Transportation Board (STB) is overseeing the regulatory process, analyzing potential impacts of increased freight traffic to the public as well as passenger rail operations.

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, including the southeastern region.

Commuter and Intercity Rail Operations: The merger should not hinder on-time performance standards and existing operating/rail timetable agreements with Amtrak, SEPTA, NJT, and other intercity passenger rail operators. The merger should also not impact proposed future intercity passenger rail service expansion. While the filing has analyzed potential impact on Amtrak routes and directly-operated commuter rail, it does not consider effects of post-merger freight volumes on services operated on passenger tracks via trackage rights, including over the regional rail system in this area, the Southeastern Pennsylvania Transit Authority Regional Rail.

SEPTA's long-term regional rail master plan envisions greatly enhanced service on the Manayunk/Norristown Regional Rail line between Philadelphia and Norristown, which is of key economic importance to the City and the surrounding counties. One of the key areas currently limiting the implementation of these service levels is the sharing of railroad tracks between passenger and freight services around the Norristown Transit Center. Track separation and associated infrastructure improvements would allow both rail services to function.

Other Economic Impacts: The STB should consider the widespread economic impacts of the merger in the region. The expanded rail network may result in better shipping rates and increased commerce. On the other hand, rail consolidation has often led to rail layoffs and higher rates for smaller customers.

Air Quality and Noise Impacts: The filings have identified several segments in Philadelphia and the surrounding area with potential air quality and noise impacts. Particularly in Philadelphia, these segments traverse densely populated areas. The STB should consider the cumulative environmental and health consequences of additional train traffic near homes and schools along those segments. The Philadelphia region is already in serious nonattainment for ozone under the Clean Air Act. Increased air pollution from higher numbers of diesel-powered trains, without further capital improvements or electrification efforts, will compound this problem. The Board's analysis should consider the cumulative effect of existing and potential additional pollution rather than treating each transaction-related increase as a standalone effect. The STB should also consider and recommend mitigation measures.

Increase in Hazardous Material Carloads: Philadelphia and the surrounding area are densely populated. A release of hazardous materials resulting from a derailment, collision, or other rail incident could endanger the health and safety of tens of thousands of residents. We ask that the environmental review process consider the potential risks associated with increased hazardous materials transportation through a densely populated urban area particularly carefully. We request that the review evaluate:

- The types and quantities of hazardous materials reasonably expected to be transported on these routes and the frequency with which they would be reasonably expected to be transported;
- The potential for derailments, collisions, or other incidents involving hazardous materials;
- The potential consequences of a release for residents, businesses, soil, groundwater, waterways, and public infrastructure and facilities; and
- The ability of local emergency responders to safely and effectively respond to a rail incident involving hazardous materials.

The City of Philadelphia recognizes the need for an efficient national freight transportation system. For the same reason, we are particularly mindful of the fact that the potential environmental, safety, and community impacts of the proposed transaction must be carefully considered alongside its potential benefits. We



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appreciate the opportunity to participate in the preliminary consultation process and request that the City of Philadelphia be included in any future consultation or environmental review concerning the potential impact of the merger in this region.

Sincerely,

Michael Carroll
Deputy Managing Director