October 29, 2026

Surface Transportation Board
Washington, DC 20423

RE: Docket FD 36873 - Proposed Union Pacific-Norfolk Southern Merger
Request for Noise Impact Evaluation - Reading Line, Blandon, Pennsylvania

To the Surface Transportation Board:

I am a resident of the Colonial Court neighborhood in Maidencreek Township, Berks County, Pennsylvania, north of Norfolk Southern's Reading Line through Blandon. I am submitting these comments regarding the projected increase in freight train traffic associated with the proposed Union Pacific-Norfolk Southern merger.

My primary concern is the impact of additional train traffic on residential neighborhoods, particularly nighttime locomotive horn noise.

Existing Train Traffic and Historical Changes

According to Federal Railroad Administration crossing inventory records for the Wesner Road crossing in Blandon, the railroad currently reports approximately 28 trains per day, consisting of 12 daytime trains and 16 nighttime trains.

My review of historical crossing inventory records indicates that before approximately 2015, the reported distribution was generally more than 20 daytime trains and approximately 8 nighttime trains. Beginning around 2016, the reported distribution shifted substantially toward nighttime operations, while total daily traffic remained relatively consistent.

Although these figures represent reported traffic rather than independently verified daily counts, they suggest that the shift toward nighttime operations around 2016 placed an increased noise burden on established residential neighborhoods, even without a substantial increase in total trains. Currently, approximately 57% of reported train movements occur during the 6:00 PM to 6:00 AM nighttime period. The proposed merger would add traffic to a corridor where residents have already experienced this shift toward nighttime operations.

Projected Increase and Environmental Screening

Information presented in connection with the proposed merger identifies a projected increase of approximately 7.36 trains per day along the Reading Line in this area. Relative to the currently reported 28 trains per day, this represents an increase of approximately 26%.

I understand that the Surface Transportation Board uses traffic increase thresholds in determining which rail segments warrant detailed environmental analysis. The projected increase of 7.36 trains per day is notably close to the commonly applied threshold of 8 additional trains per day.

As a professional engineer familiar with environmental permitting and regulatory screening criteria, I recognize the need for thresholds to establish reasonable limits on the scope of environmental reviews. However, a projected increase immediately below a screening threshold does not necessarily indicate an absence of meaningful impacts.

I request that the Board examine the assumptions, methodology, and uncertainty associated with the projected 7.36 additional trains per day and explain whether reasonable variations in projected traffic could cause this segment to exceed the applicable screening threshold.

Residential Noise Impacts

My neighborhood is exposed to locomotive horn noise associated with multiple at-grade crossings along the Reading Line through Blandon. Although the Colonial Court neighborhood is approximately 1 mile from several nearby crossings and is farther from the tracks than many other residential areas shown on the attached map, locomotive horns are still a recurring disturbance at this distance. Numerous established residential neighborhoods lie substantially closer to the railroad and may experience greater noise impacts.

The noise is not necessarily attributable to a single crossing. Horns associated with several crossings may be audible from the same residential location, and repeated horn sequences during a single train movement can create a cumulative noise impact.

The attached map identifies Colonial Court and the nearby railroad crossings, including those near Wesner Road, Park Road, and other local streets. Many residential neighborhoods are located closer to the crossings than Colonial Court. I request that the analysis consider the entire affected corridor, rather than limiting potential noise impacts to residences immediately adjacent to individual crossings.

This concern extends beyond my own neighborhood to the broader Blandon residential community. I am particularly concerned that additional freight traffic may occur disproportionately during nighttime hours, given the existing reported distribution of train movements. The neighborhoods have already absorbed a substantial shift toward nighttime train activity since approximately 2016 and now face another potential increase in noise exposure.

Requested Actions

1. Evaluate existing and projected locomotive horn noise along the Reading Line through Blandon, including cumulative impacts from multiple at-grade crossings.

2. Consider nighttime train frequency and the potential for sleep disturbance, rather than relying solely on average daily train counts.

3. Review the assumptions and uncertainty underlying the projected 7.36-train-per-day increase, particularly given its proximity to the applicable screening threshold.

4. Consider the historical shift toward nighttime train operations when evaluating the impacts of additional traffic.

5. Evaluate potential mitigation measures, including the feasibility of establishing a corridor-wide quiet zone or implementing other measures to reduce locomotive horn noise in residential areas.

6. Include the Blandon residential corridor in the environmental review or provide a specific technical explanation supporting its exclusion from detailed noise analysis.

I am not suggesting that freight railroad operations should be eliminated or that every increase in train traffic is unacceptable. However, after the substantial shift toward nighttime operations around 2016, a further approximately 26% increase in train movements through an established residential community warrants meaningful consideration of cumulative noise impacts.

Thank you for considering these comments.

Respectfully,

Thomas J. Duffy, P.E.
Resident, Maidencreek Township
Berks County, Pennsylvania

Attachment A - Reading Line crossings and residential neighborhoods near Blandon

Colonial Court is identified for geographic context; the yellow symbols show at-grade crossings.

