

September 17, 2026

Elizabeth Webster
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 Company –
Control – Norfolk Southern Corporation and Norfolk Southern Railway Company;
Preliminary Consultation

Dear Ms. Webster:

The following comments are submitted by the Reading Area Transportation Study Coordinating Committee, the designated Metropolitan Planning Organization for the Reading (PA) Urban Area in response to the Surface Transportation Board's Office of Environmental Analysis' letter dated August 19, 2026 regarding the above referenced Docket No. FD 36873.

1. We acknowledge the findings listed for the Harrisburg Line (Segment Key 10123) related to a projected Trains Per Day (TPD) Transaction Growth of 8.46 TPD that exceeds the TPD threshold that triggers Air Quality and Noise Analysis. The Berks County portion of this segment contains a number of at -grade crossings. There is a concern that the increase in traffic could cause additional delays at these crossings which could adversely impact vehicular traffic and potentially delay emergency response vehicles.
2. We acknowledge the findings listed for the Other (Segment Key 12375) related to a projected TPD Transaction Growth of 7.76 TPD that exceeds the TPD threshold for Air Quality Analysis but question why this area does not trigger a Noise Analysis given the surrounding urban area.
3. We acknowledge the findings listed for the Reading Line (Segment Key 10009) related to a projected TPD Transaction Growth of 7.36 TPD that exceeds the TPD threshold for Air Quality Analysis but question why this area does not trigger a Noise Analysis given the surrounding suburban area, and rural area interspersed with multiple boroughs. This area is also marked by a high percentage of at -grade crossings which will require a significant expansion of the number of times locomotives will have to activate warning horns as they approach these crossings. There is also concern that the increase in traffic could cause additional delays at these crossings which could adversely impact vehicular traffic and potentially delay emergency response vehicles.

4. The Reading MPO is also working with the Schuylkill River Passenger Rail Authority to investigate the restoration of passenger rail service between Reading and Philadelphia under the Federal Rail Administration's Corridor Identification and Development Program, with additional connections beyond Philadelphia as future considerations.

The interactive map, excerpt attached, identifies Abrams Yard, line segments including the Norristown Connection, Morrisville Connecting Track and Morrisville Line, as meeting their respective thresholds for environmental analysis based on volume of yard activity and potential air quality impacts, respectively. Similarly, the Harrisburg Division, Harrisburg Line between Harrisburg and Reading, and the Reading Line between Reading and Allentown, are identified as meeting their thresholds for air quality and noise impacts, and for air quality impacts, respectively.

It is not clear how the freight traffic levels between Harrisburg, Reading and Allentown, as well as between Abrams Yard and Morrisville, meet the thresholds while the Harrisburg Division Falls-Reading Line between Reading and Abrams Yard does not. All three counties – Berks, Montgomery, and Chester – appear to be non-attainment counties based on information provided on the USEPA website as of August 31, 2026. Additionally, if the traffic volumes at both ends of the Falls-Reading Line are sufficient to meet the thresholds, it seems counterintuitive that the Falls-Reading Line itself would not.

Could you please provide the basis for the different characterizations regarding meeting the environmental thresholds depicted on the interactive map? Please include any forecasted traffic data for the Falls-Reading Line portion of the Harrisburg Division.

We thank you for the opportunity to review this information and provide comments.

Sincerely,

Alan D. Piper, Secretary
Reading Area Transportation Study (Reading, PA MPO)

(Attachment)

Cc: Schuylkill River Passenger Rail Authority
Berks County Board of Commissioners

