



SUPER NEIGHBORHOOD 64 & 88

GREATER EASTWOOD, LAWDALE, & WAYSIDE

November 7, 2025

The Honorable Patrick J. Fuchs
Chairman
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423

310250
ENTERED
Office of Chief Counsel
November 13, 2025
Part of
Public Record

**Re: Finance Docket 36873 – Union Pacific Corporation–Norfolk Southern Corporation Merger
Request for Houston Public Hearing, Enhanced Environmental Analysis, and Community
Mitigation**

To Chairman Fuchs and Members of the Board:

I write to you as President of Super Neighborhoods 64 & 88, representing the Greater Eastwood, Lawndale, and Wayside communities in Houston's East End. Our neighborhoods are home to roughly 23,000 residents who live and work alongside some of the busiest rail corridors in the state of Texas. We submit this letter in strong support of the concerns raised by Mayor John Whitmire on behalf of the City of Houston. We provide additional community-specific data and requests that demonstrate the urgent need for a comprehensive review and mitigation of this proposed merger.

Houston's Critical Role and Current Conditions

Houston is the nation's fourth-largest city and sits at the crossroads of the national freight network, serving as a critical hub for rail and port activity on the Gulf Coast. It is a key point for both the Union Pacific Railroad and the Burlington Northern Santa Fe Railroad, supporting the commodity flow. The proposed \$85 billion merger would create the first modern transcontinental railroad, with Union Pacific identifying Houston as a key node in its expansion strategy to capture more Midwest freight bound for Gulf Coast ports.

Our East End neighborhoods—including Greater Fifth Ward, OST/South Union, and Northside communities—are among the most rail-impacted urban areas in the nation. We are effectively trapped in a "Rail Triangle," surrounded by the Houston East Belt Subdivision, the Houston West Belt Subdivision, and the Galveston Subdivision. We have only one grade-separated crossing on non-interstate roadways, which severely limits our mobility.

Documented Community Impacts

The Eastwood Civic Association, which represents over 2,900 homes within our Super Neighborhood boundaries, has systematically tracked train movements and documented alarming conditions:

- **In 2024**, the Eastwood & Rusk crossing experienced an average of 148 trains per month, with 27% stopping for more than 10 minutes and blocking the crossing for an average of 48 minutes



SUPER NEIGHBORHOOD 64 & 88

GREATER EASTWOOD, LAWDALE, & WAYSIDE

- **In 2025** (year-to-date): This has increased to an average of 206 trains per month, with 25% still stopping for extended periods
- **Train lengths of 9,000 to 9,300 feet** mean that a single train can simultaneously block 14 of our 15 at-grade crossings

These frequent blocked crossings—sometimes lasting hours—cause delays for emergency responders, divide communities, and contribute to air quality and noise issues affecting tens of thousands of residents. The Houston Fire Department documents hundreds of incidents each year where stopped trains delay emergency vehicles or force reroutes, creating unacceptable risks to life and safety.

What was once manageable rail activity has become relentless mobility challenges and a degradation in the quality of life. Our streets function as parking lots for rail operators. Without proper oversight and mitigation, this merger will intensify the operational pressures already affecting our city.

Our Requests to the Surface Transportation Board

We call for both procedural safeguards and substantive commitments that protect Houston residents and first responders. We respectfully submit the following detailed requests:

I. Procedural Fairness and Community Participation

1. Hold at Least One Public Hearing in Houston

During the Canadian Pacific-Kansas City Southern merger review, Houston played a central role in operations but was excluded from direct public engagement. The STB held a public hearing in Beaumont—on a weekday—making it difficult for working Houstonians to participate.

We formally request that the STB hold at least one public hearing in Houston at a time and location accessible to working residents, including evening or weekend hours. Houston's residents—especially those in our East End neighborhoods—must have a meaningful opportunity to participate in this process and testify before the Board in their own city about a merger that will significantly impact rail operations in their neighborhoods.

2. Allow Sufficient Time for Community Review

We require sufficient time between technical filings and public comment deadlines to allow for community review of merger applications, environmental analyses, and operational forecasts. Local residents and city departments must be able to evaluate projected changes in train volume, frequency, length, and impacts on crossings and air quality.

We urge the STB to establish a robust public comment process that allows sufficient time for neighborhoods and community organizations to analyze the impacts and submit substantive feedback, and to give meaningful weight to community input from neighborhoods that will experience direct operational impacts.



SUPER NEIGHBORHOOD 64 & 88

GREATER EASTWOOD, LAWDALE, & WAYSIDE

3. Conduct a Comprehensive System Impact Study

Current EIS methodologies are inadequate for Houston's complex rail network. The CP-KCS merger review focused its analysis solely on merger-related lines, failing to capture the cascade effects that are a primary cause of prolonged blockages in our neighborhoods. In cities like Houston, where interchanges are at-grade, trains on secondary lines must wait for priority routes to clear before they can proceed.

We request a comprehensive system impact study that examines:

- Both primary merger routes and secondary lines throughout the Houston region
- Secondary line interactions and wait times at interchanges
- Cumulative impacts of increased traffic on the entire Houston rail network
- At-grade crossing blockage patterns and durations
- Effects on parallel roadways and alternative routes

Rail congestion in Houston is interlinked across multiple carriers and subdivisions; a narrow review will fail to capture cascading effects that cause prolonged blockages and emergency response delays.

4. Enhanced Environmental Impact Statement for Houston

We are deeply concerned about the adequacy of standard EIS methodologies. Current methodologies calculate blocked crossing time as a function of average train length and speed, failing to account for trains that stop completely for extended periods. Given that our community data shows 27% of trains stop for an average of 48 minutes, this methodological gap results in significant undercounting of impacts.

We strongly urge the STB to require a supplementary EIS specifically for the Houston Complex that:

- Uses updated methodologies to properly account for the high rate of stopped trains and extended blockages
- Evaluates all potential routes through the Houston Complex, not just primary pathways
- Ensures traffic volume projections accurately reflect post-pandemic freight increases and cumulative impacts of the recent CP-KCS merger
- Addresses gaps in sections covering grade crossing delays, noise, air quality, environmental justice, and cumulative impacts
- Incorporates findings from the City's Smart Railroad Crossing Monitor Pilot and Houston Fire Department incident data

5. Include Time for Community Mitigation Planning

The procedural schedule must include time for community mitigation planning, ensuring affected neighborhoods can review, negotiate, and comment on proposed mitigation measures prior to final merger approval. We request that the STB convene all local stakeholders to develop a comprehensive mitigation plan for the entire Houston Complex before any approval.



SUPER NEIGHBORHOOD 64 & 88

GREATER EASTWOOD, LAWDALE, & WAYSIDE

6. Honest, Localized Infrastructure Impact Forecasts

Industry projections indicate that "the densest lanes are projected to emerge post-merger," yet Houston has not received clear, localized predictions about what this means for our communities. We request detailed, neighborhood-specific impact forecasts for Houston's East End that honestly assess:

- Projected increases in freight volume through our rail corridors
- Expected changes in train frequency and length
- Anticipated impacts on at-grade crossing wait times
- Effects on emergency response times and access
- Air quality impacts on schools and residential areas

Our residents need transparent, data-driven projections—not generalized regional assessments that obscure local impacts.

II. Substantive Mitigation Commitments

To safeguard public safety and maintain quality of life as rail traffic increases, we request that any merger approval include binding commitments requiring:

1. Infrastructure Investment

Grade Separation Projects:

- Funding for grade separation projects at the City's highest-priority crossings to eliminate frequent and prolonged blockages
- Letters of support and commitment of at least 25% of project costs for City of Houston applications to the FRA's Railroad Crossing Elimination Grant for projects identified in the Harris County Precinct 2 East End RAILS Study
- Funding to open the underpass at Preston Road and St. Charles for pedestrian and cyclist access

Quiet Zone Implementation:

- East End 2 (Sampson to Cullen on West Belt)
- East End 3 (Sampson to Hughes on Galveston Sub)
- East End 1 - Part 2 (Hughes to Navigation on East Belt)
- All necessary FRA and railroad approvals must be included

2. Operational Restrictions

Train Length Limitations:

- No trains longer than the minimum length accommodated in Englewood yard should be permitted to enter Houston



SUPER NEIGHBORHOOD 64 & 88

GREATER EASTWOOD, LAWDALE, & WAYSIDE

- This would eliminate the need to break trains within the complex and reduce blockage frequency and duration
- Updates to railroad operations to ensure trains unable to fit in Englewood or Settegast yards cannot move through the Houston Complex

Idling Time Limits:

- Reasonable limits on train length and idling time within urban and residential areas to prevent gridlock and reduce diesel emissions

3. Community Protections

- Support for additional quiet zones and improved rail safety infrastructure
- Measures to minimize noise and vibration impacts in affected neighborhoods
- Installation and maintenance of air quality monitors on all railroad lines within one mile of schools in our neighborhoods
- Monthly maintenance of railroad right-of-ways to clear illegal dumping and overgrown vegetation
- Creation and ongoing maintenance funding for park spaces immediately adjacent to railroad right-of-ways, including community spaces and dog parks

4. Emergency Response Coordination

Formalized communication protocols between the merged railroad and the Houston Fire Department, EMS, and Police Department to:

- Prevent emergency response delays
- Ensure real-time coordination during blockages
- Provide direct community access to railroad police representatives

5. Required Planning and Studies

East Belt Grade Crossing Study:

- Union Pacific must fund a local entity, such as the Gulf Coast Rail District, to complete a comprehensive study of the East Belt
 - Goal: eliminate at-grade crossings and associated blockages along the East Belt between I-45 and Tower 87
- Must include a review of the area where the East Belt and Galveston Sub intersect to identify solutions for excessive blockages

Comprehensive Rail Safety Study:

- Fund a local entity to conduct a comprehensive study of railroad and road infrastructure in the East End, from East Downtown to Manchester, south of Interstate 10, and north of Interstate 45
- Must include review of pedestrian, cyclist, and vehicular circulation to achieve Vision Zero
- Develop short-, medium-, and long-term solutions for optimal safety around trains



SUPER NEIGHBORHOOD 64 & 88

GREATER EASTWOOD, LAWDALE, & WAYSIDE

6. Data-Driven Oversight

Incorporation of findings from the City's Smart Railroad Crossing Monitor Pilot and Houston Fire Department incident data into the STB's environmental and operational monitoring requirements.

7. Community Engagement

- Require ongoing communication and outreach to neighborhoods with the highest frequency of blocked crossings
- Public education on rail safety, real-time information resources, and tools to help residents manage and respond safely to stopped train events
- A designated Union Pacific police representative assigned to the Houston area who must attend Houston Police Eastside and South Central Police Positive Interaction Program (PIP) meetings to answer residents' questions directly

Conclusion and Alternative Request

As stated, Houston's economic vitality depends on efficient freight rail operations—but our residents and first responders cannot bear the escalating costs of congestion and inaction. This merger review presents an opportunity for the Surface Transportation Board to strike a balance between national freight efficiency and local public safety and environmental justice.

The communities we represent have lived with the consequences of rail operations for generations. We understand that freight rail is essential to our economy, but we also know firsthand how operational decisions made at the federal level have a daily impact on the quality of life at the local level.

The current state of operations is unacceptable and has worsened dramatically since the COVID-19 pandemic, followed by additional pressure from the CP-KCS merger. The cumulative effect of increased freight volumes and sequential rail consolidations is creating an untenable situation, yet no entity is being held accountable for these compounding impacts.

We implore the Surface Transportation Board to consider rejecting the current proposal and requiring Union Pacific and Norfolk Southern to seek an alternative routing that avoids further burdening the already overwhelmed Houston Complex.

If rejection is not feasible, we urgently request that any approval be conditioned on:

- Enhanced environmental analysis specifically for the Houston Complex using updated methodologies
- Comprehensive stakeholder engagement to develop adequate mitigation plans and binding agreements
- Implementation of all mitigation measures outlined above
- A comprehensive federal investigation of rail operations throughout the Houston Complex

SUPER NEIGHBORHOOD 64 & 88

GREATER EASTWOOD, LAWDALE, & WAYSIDE

Our requests are not unreasonable. They represent the bare minimum of what our communities need to ensure that increased rail operations do not further degrade our quality of life, our children's health, and the safety of our neighborhoods. If Union Pacific and Norfolk Southern stand to benefit from this merger, then the communities that make their operations possible deserve meaningful investment and protection in return.

We respectfully request that the Board adopt a schedule that ensures meaningful public participation in Houston, conduct a comprehensive impact analysis of the full regional rail system, and condition any approval on enforceable mitigation commitments that directly protect the people of Houston.

Houston must be part of the conversation—not as a footnote in a regional analysis, but as the rail-adjacent communities we are, with a voice in decisions that will shape our neighborhoods' future.

Thank you for your leadership and attention to these critical issues. We stand ready to collaborate with the Board, the applicants, Mayor Whitmire, and our regional partners to achieve a balanced and equitable outcome for our residents and the national rail network.

Respectfully submitted,



Lindsay Williams
President, Super Neighborhoods 64 & 88
(Greater Eastwood, Lawndale, Wayside)

CC:

- Member Michelle Schultz
- Member Karen Hedlund
- All Parties of Record
- The Honorable John Whitmire, Mayor, City of Houston
- Houston City Council Members
- Texas State Representative Christina Morales
- Texas State Representative Ana Hernandez
- Texas State Senator Carol Alvarado
- Gulf Coast Rail District
- East End District
- The Honorable Sean Duffy, Secretary of Transportation
- Houston Congressional Delegation
- Harris County Commissioners Court



SUPER NEIGHBORHOOD 64 & 88

GREATER EASTWOOD, LAWNDAL, & WAYSIDE

- Houston Police Department - Eastside Division
- Eastwood Civic Association