



For Council Member Castillo.

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Chair Patrick Fuchs
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Office of Chief Counsel
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Public Record

Re: Proposed Union Pacific-Norfolk Southern Merger - Request for Houston Public Hearing and Comprehensive Impact Analysis

To Patrick Fuchs and Members of the Board:

I write to you as the elected representative of Houston City Council District H, which encompasses numerous neighborhoods directly and significantly impacted by freight rail operations. My constituents live and work alongside some of the busiest rail corridors in Texas, and they will be profoundly affected by the proposed Union Pacific-Norfolk Southern merger.

Houston is not a peripheral player in this merger—we are a central part of it. As the nation's fourth-largest city and a critical hub for freight movement, Houston's rail infrastructure serves as a vital link in the national supply chain. However, our residents also bear the daily burden of rail operations: blocked crossings that delay emergency services, disrupted traffic patterns that affect commutes and commerce, and trains that physically divide neighborhoods for extended periods.

Given Houston's critical role and our community's substantial stake in this merger's outcome, I respectfully submit the following requests on behalf of my constituents and the City of Houston on how the p:

1. A 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 Surface Transportation Board held a public hearing in Beaumont—on a weekday—making it difficult for working Houstonians to participate. This was inadequate.

I formally request that the STB hold at least one public hearing in Houston at a time and location accessible to residents, including evening or weekend hours to accommodate working families. Houstonians deserve the opportunity to testify before the Board in their own city about a merger that will significantly impact rail operations in their neighborhoods.



2. Honest, Localized Infrastructure Impact Forecasts

Early analysis suggests that the STB may place less emphasis on post-merger freight volume impacts to expedite the merger decision process. 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.

I request that the STB require detailed, city-specific impact forecasts for Houston that honestly assess:

- Projected increases in freight volume through Houston rail corridors
- Expected changes in train frequency and length
- Anticipated impacts on at-grade crossing wait times
- Effects on emergency response times and access

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

3. Full System Impact Study

The CP-KCS merger review focused its analysis solely on merger-related lines. However, in cities like Houston, where interchanges are at-grade, trains on secondary lines must wait for priority routes to clear. This cascade effect is one of the primary causes of prolonged blockages in neighborhoods like the East End and Fifth Ward, where trains regularly block crossings for 30 minutes or more.

I request that the STB conduct a comprehensive system impact study that examines not only direct merger lines but also:

- Secondary line interactions and waiting 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

The previous merger review's narrow scope failed to capture the real-world operational dynamics that affect Houston residents daily. This merger review must not repeat that mistake.

4. Meaningful Public Comment Period

I am submitting this letter early in the review process because I understand that late submissions—particularly those requesting comment period extensions after deadlines have passed—do not meaningfully shape outcomes. Houston's voice must be part of the conversation from the beginning, not as an afterthought.



I urge the STB to establish a robust public comment process with sufficient time for cities, community organizations, and residents to analyze the merger's impacts and submit substantive

feedback. Furthermore, I request that the Board give meaningful weight to local government input, particularly from jurisdictions like Houston, which will experience direct operational impacts.

Conclusion

The communities I represent have lived with the consequences of rail operations for generations. They understand that freight rail is essential to our economy, but they also know firsthand how operational decisions made at the federal level create daily quality-of-life impacts at the local level.

This merger represents a transformative moment for American rail. Houston must be part of the conversation—not as a footnote in a regional analysis, but as the major metropolitan area we are, with a voice in decisions that will shape our city's future.

I respectfully urge the Surface Transportation Board to grant these requests and to ensure that Houston residents have a meaningful opportunity to participate in this historic review process.

Thank you for your consideration. I am available to discuss these concerns further and welcome the opportunity to work with the Board to ensure a thorough and equitable review process.

Respectfully submitted,

Mario Castillo

Council Member, District H
City of Houston