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BEFORE THE
SURFACE TRANSPORTATION BOARD

FINANCE DOCKET NO. 36873

UNION PACIFIC CORPORATION AND
UNION PACIFIC RAILROAD COMPANY
—CONTROL—
NORFOLK SOUTHERN CORPORATION AND
NORFOLK SOUTHERN RAILWAY COMPANY

COMMENT

ENTERED
Office of Chief Counsel
March 27, 2026
Part of
Public Record

October 3, 2025

The Honorable Patrick J. Fuchs
Chairman
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Subject: Finance Docket 36873, Proposed Procedural Schedule Public Comment

We write to you as the Joint East End Super Neighborhood Coalition, representing three of Houston's most rail-impacted communities: Super Neighborhood 63 (Second Ward), Super Neighborhoods 64 & 88 (Greater Eastwood, Lawndale, Wayside), and Super Neighborhoods 85 & 82 (Magnolia Park, Manchester, Smith Addition, Harrisburg). Our combined communities comprise over 35,000 residents who live and work alongside some of the busiest rail corridors in Texas, and we will be profoundly affected by the proposed merger between Union Pacific and Norfolk Southern.

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.

The East End communities we represent experience some of the most severe rail impacts in the region. Our neighborhoods are bisected by multiple rail lines; our children attend schools within feet of active freight corridors, and our residents routinely experience crossing blockages that last from 30 minutes to many hours. We are not opposed to freight rail—we understand its economic importance—but we cannot accept another merger that increases operational intensity without meaningful mitigation for the communities that bear the brunt of the burden.

Given Houston's critical role and our community's substantial stake in this merger's outcome, we respectfully submit the following requests:

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.

We 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. East End residents 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.

We request that the STB require 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.

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 before they can proceed. This cascade effect is one of the primary causes of prolonged blockages in neighborhoods like the East End, Second Ward, and Fifth Ward, where trains regularly block crossings for 30 minutes or more.

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

- 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

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

4. Meaningful Public Comment Period

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

We urge the STB to establish a robust public comment process that allows sufficient time for neighborhoods, community organizations, and residents to thoroughly analyze the merger's impacts and submit substantive feedback. Furthermore, we request that the Board give meaningful weight to community input, particularly from neighborhoods like ours that will experience direct operational impacts.

5. Required Community Mitigation Measures

If this merger is approved, the East End cannot simply absorb increased rail impacts without meaningful mitigation. We request that the STB require Union Pacific to implement the following community benefit measures as conditions of merger approval:

Environmental Protection:

- 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 (currently, our communities wait months for cleanup while wealthier areas receive prompt service)

Safety and Accessibility:

- \$5 million in funding to open the underpass at Preston Road and St. Charles for pedestrian and cyclist access
- Twenty-five percent funding for ten grade separations for all modes of transportation in the East End to provide safe crossing alternatives as freight traffic increases
- Implementation of Quiet Zones on:
 - Galveston Subdivision from Congress Yard to the 610 Loop
 - Clinton Line from Highway 59 to the 610 Loop
 - West Belt from Spur 5 through Tower 26
 - East Belt from Interstate 45 through Englewood Yard

Operational Improvements:

- Updates to railroad operations requiring that trains unable to fit in Englewood or Settegast yards cannot move through the Houston Complex (preventing trains from blocking our neighborhoods while waiting for yard space)
- A designated Union Pacific police representative is assigned to the Houston area to handle community requests, rather than a statewide representative who cannot respond

to local needs. This representative must attend Houston Police Eastside and South Central Police Positive Interaction Program (PIP) meetings to answer residents' questions directly and provide direct support.

Community Investment:

- Creation of park spaces immediately adjacent to railroad right-of-ways, including community spaces and dog parks
- Ongoing maintenance funding for these park spaces to ensure they remain safe and usable community assets
- Abandonment of the parcel of land owned by Union Pacific in the Second Ward area, on the West Belt railroad line (and associated rail spur) bordered by St. Charles St., Commerce St., and Riley Lane for park and community space development.
- Abandonment of the parcel of land owned by Union Pacific in the Second Ward area, and associated rail spur, along N Velasco St., Bordered by Buffalo Bayou to the north, Navigation/Engelke to the south, and N Velasco to the West with the intention of utilizing that space for park/community space which would double as debris collection during major storm events.

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.

This merger represents a transformative moment for American rail. The East End 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.

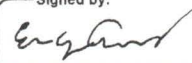
Our requests are not unreasonable. They represent the bare minimum of what our communities need to ensure that increased rail operations do not further degrade our quality of life, our children's health, and the safety of our neighborhoods. If Union Pacific and Norfolk Southern stand to benefit from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

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

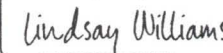
Thank you for your consideration. We are available to discuss these concerns further and welcome the opportunity to work with the Board to ensure a thorough and equitable review process.

Respectfully submitted,

Ricky Cardenas, President, Super Neighborhood 63 (Second Ward)

Signed by:

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

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Priscilla Argueta, President, Super Neighborhoods 85 & 82 (Magnolia Park, Manchester, Smith Addition, Harrisburg)

Signed by:

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On behalf of the Joint East End Super Neighborhood Coalition

CC:

- Member Michelle Schultz
- Member Karen Hedlund
- All Parties of Record
- Mayor John Whitmire, City of Houston
- Houston City Council Members
- Houston Congressional Delegation
- Harris County Commissioners Court
- Texas Transportation Commission
- Houston Police Department - Eastside Division
- Houston Police Department - South Central Division

CERTIFICATE OF SERVICE

I hereby certify that I have caused the foregoing *Procedural Comment* to be served electronically or by first-class mail, postage prepaid, on the Secretary of Transportation, the Attorney General of the United States, Applicants' representatives, Administrative Law Judge Jenifer Soulikias, and all parties of record in this proceeding.

/s/

Lindsay Williams

President, Super Neighborhood 64 & 88

President, Eastwood Civic Association

Chair, Trains Committee

Community Advisory Board Member, Houston Area Rail
Transformative

Member, East End District Rail Safety Task Force

March 27, 2026