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Ruben Garza
615 N. Emile Street, Houston, Texas 77020
rubengarza804@gmail.com

ENTERED
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VIA ELECTRONIC FILING

Surface Transportation Board 395 E Street, SW Washington, DC 20423-0001

Re: Docket No. FD 36873, Union Pacific Corp., et al. – Control – Norfolk Southern Corp., et al. – Resident Comment on the Completeness of the Revised Application

To Chairman Fuchs and Members of the Surface Transportation Board:

I am an attorney licensed in the States of Texas and Ohio. The following is a representation of only my personal views and not a legal analysis of any kind. I am not writing this letter on behalf of any employer nor organization. The views expressed herein are mine alone and do not represent the views of any organization(s) I am affiliated with, nor any past, present, or future employers.

I have lived in Houston's East End for approximately four years across several neighborhoods, and I currently live in the Fifth Ward, close to Union Pacific's Englewood Yard. I live near a train track bisecting Schweikhardt Street in Houston. I am writing to ask the Board not to find the Revised Application complete until the Applicants disclose how merger-related operational changes will affect blocked crossings and the residential streets that absorb the spillover.

The Fifth Ward is heavily impacted by Union Pacific operations at Englewood Yard. When trains block the crossings near my home, which happens multiple times a day, drivers look for alternate routes in residential streets. They speed down nearby streets at unsafe speeds, trying to find a way around. These streets are where families walk to bus stops, and where workers in nearby industrial areas have to cross to get to and from work. The danger is direct, it is daily, and it is created by Union Pacific operations.

I am personally affected by stuck trains as I travel to and from Fifth Ward and the East End for various activities. I also see children crossing these stuck trains with no other alternate routes, risking their lives to simply bypass a problem Union Pacific created. It is common to be over 30 minutes late to events in the East End because of stuck trains. A stuck train is a significant detriment to the health, wealth, and safety of Houstonians.

This is exactly the kind of cascading impact that the East End and Fifth Ward face because of the current Union Pacific operations in a congested rail network. When one crossing is blocked, traffic shifts to neighboring streets, neighboring lines, and neighboring neighborhoods. It is also

exactly what the Revised Application fails to analyze. Applicants address blocked crossings in a single paragraph at Volume 1, page 101, deferring all substantive analysis to environmental review. That deferral leaves my neighborhood and the residential streets where displaced traffic lands out of the merger record entirely.

Applicants' own Electronic Appendices Q, R, S, and T indicate Houston will absorb significant additional rail volume, including a 20.15% workload increase at Englewood Yard. Every additional movement through Englewood produces additional blockages on the streets surrounding my home. Every additional blockage produces additional drivers cutting through residential streets at speed. The Revised Application does not address it.

It is my understanding that the Board's merger rules at 49 C.F.R. § 1180.1(i) direct the Board to consider cumulative impacts and crossover effects, because, as the rule itself states, "the Board cannot evaluate the merits of a major transaction in isolation." The cascading impact on Fifth Ward residential streets from Englewood Yard operations is precisely the kind of crossover effect the rule contemplates. It belongs in the application, not in a later, separate environmental review on a procedural track most residents will never see.

I respectfully ask the Board to:

1. Decline to find the Revised Application complete until Applicants disclose how the projected 20.15% Englewood Yard workload increase will affect crossings, traffic patterns, and residential streets in the Fifth Ward and surrounding neighborhoods.
2. Require analysis of the cascading effects of blocked crossings under 49 C.F.R. § 1180.1(i), including diverted traffic onto residential streets not designed to absorb it.
3. Require Applicants to propose specific mitigation measures responsive to the residential-street safety impacts of merger-related Englewood Yard growth.
4. Conduct public hearings in Houston — including the Fifth Ward and the East End — so that residents most directly affected by these impacts can testify on the record.

Thank you for your consideration.

Respectfully submitted,

/s/ Ruben Garza

Ruben Garza

cc: All Parties of Record

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of May, 2026, the foregoing document was served to all parties of record to this proceeding.

/s/ Ruben Garza
Ruben Garza