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Office of Chief Counsel
May 26, 2026
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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. – Community Impacts of Blocked Rail Crossings in Houston, Texas

Chairman Fuchs and Members of the Surface Transportation Board:

On behalf of the City of Houston, I respectfully urge the Board to deem the proposed Union Pacific-Norfolk Southern merger application incomplete until the Applicants submit detailed blocked-crossing impact data, and to condition any eventual approval on enforceable mitigation measures that protect residents, first responders, students, and local businesses.

Thousands of families that I represent live near the Union Pacific main lines that run through dense, working-class, and historically underserved neighborhoods in Houston's East End. The proposed merger carries significant material consequences for the daily mobility, public safety infrastructure, and quality of life across these communities, including daily disruptions to emergency response, school access, commutes, local businesses, and neighborhood mobility.

Under 49 U.S.C. § 11324(c), the Board may approve this transaction only if it finds the proposal consistent with the public interest. Although the Applicants argue that blocked crossings should be addressed through environmental review under 49 C.F.R. § 1180.8(a)(2), environmental review alone does not guarantee binding operating conditions, real-time data sharing, emergency response protections, or enforceable mitigation for residents already living with severe rail gridlock.

Federal Railroad Administration (FRA) data indicate that the East End Triangle has the single highest concentration of reported blocked rail crossings of any community in the country, including eight of the 10 most frequently reported blocked crossings nationwide during a 12-month period. The nation's most-reported crossing, Eastwood Street at the Galveston Subdivision, FRA crossing 859522Y, recorded 842 blockages during that period. Community documentation from November 2021 through April 2026 shows that approximately one-third of trains blocked this crossing for over 10 minutes, with an average duration of 30 minutes.

These blockages carry direct public safety risks. The September 2024 Houston East End Triangle R.A.I.L.S. Study found that Houston Fire Department crews are delayed or forced to reroute approximately 96 times per month within the East End Triangle alone, adding up to 10 minutes to active emergency response times. Fire Station 18, located inside the Triangle, depends on three at-grade crossings for mutual-aid routes, meaning a single blocked train can delay emergency access when residents need help most. Further, hundreds of students must cross active tracks each school day – from Lantrip Elementary, Eastwood High School, Stephen F. Austin High School, Yolanda Black Navarro Middle School, and multiple KIPP campuses – with educators repeatedly documenting children crawling under or climbing over stopped rail cars, a significant safety concern for the area.

Houston communities should not be asked to absorb additional freight impacts without accountability, infrastructure investment, and real operational safeguards. I respectfully request that the Board condition any approval of this transaction on the following enforceable measures:

1. **Blocked Crossings:** Treat blocked crossings as a substantive operational and public interest issue in this proceeding, in addition to any environmental review.
2. **Cross-Sectional Disclosures:** Require the Applicants to submit detailed, neighborhood-level projections mapping the frequency, duration, and timing of post-merger crossing blockages across all at-grade locations in densely populated urban corridors.
3. **Real-Time Emergency Data Integration:** Require sharing of real-time train movement with local emergency management agencies, the Houston Fire Department, and 911 dispatchers to facilitate emergency rerouting.
4. **Quarterly Reporting:** Require public, quarterly reporting regarding blockage frequencies and durations at high-impact crossings.
5. **Binding Capital Commitments:** Require binding investment commitments for grade separations, crossing modernization, signal improvements, and other physical mitigation at high-risk crossings identified by local officials and community task forces.
6. **Dedicated Regional Point of Contact:** Create a dedicated regional liaison and formal complaint resolution process for affected residents, Super Neighborhood leaders, and local governments.

Thank you for your consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Alejandra Salinas', with a stylized flourish at the end.

Alejandra Salinas
Houston City Council Member, At-Large 4

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of May, 2026, the foregoing document was served via electronic filing to all parties of record to this proceeding.

/s/ Alejandra Salinas

A handwritten signature in black ink, appearing to read 'Alejandra Salinas', with a stylized, cursive script.

Alejandra Salinas
Houston City Council Member, At-Large 4