



September 21, 2026

VIA ELECTRONIC FILING

Danielle Gosselin, Director
Office of Environmental Analysis
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Re: Docket No. FD 36873, Union Pacific Corporation, et al. – Control – Norfolk Southern Corporation, et al. – Preliminary Comments on Scope of Environmental Impact Statement

Dear Director Gosselin:

On behalf of the City of Houston, At-Large Position 4, I submit these preliminary comments to identify significant concerns with the current scope of the Environmental Impact Statement for the proposed Union Pacific-Norfolk Southern transaction and request changes to ensure Houston's most affected communities are fully considered.

Thousands of families I represent live along Union Pacific main lines through dense, working-class, and historically underserved neighborhoods in Houston's East End. Blocked crossings already disrupt emergency response, school access, commutes, local businesses, and neighborhood mobility. Despite this, the applicants' current environmental analysis largely stops before reaching the East End and Fifth Ward, where these impacts are concentrated.

I request that the City of Houston and my office be added to the consultation distribution list for the remainder of the environmental review.

I also request the following changes:

1. Extend the study area into Houston's urban core

The applicants' environmental review analyzes 68 grade crossings, largely in Liberty, Chambers, and Jefferson counties, while the crossing, noise, and quiet-zone analysis stops at Tower 87.

Federal Railroad Administration data show 25,196 blocked-crossing reports at Union Pacific crossings across the nine-county Houston region between January 2021 and June 2026, yet none of the region's 20 most reported crossings are included – all of which are located in Houston's East End and Fifth Ward, with Eastwood Street alone accounting for 2,905 reports.

I respectfully request that the EIS include Union Pacific grade crossings throughout Harris County, particularly the Houston segments west of Tower 87 and the Settegast and Englewood yard complexes.

2. Analyze Houston segments that fall just below the numeric thresholds

For rail lines in Clean Air Act nonattainment areas, the Board's regulations identify an increase of three trains per day or 50 percent in annual gross ton miles as thresholds for environmental analysis. The application projects approximately 1.88 to 2.29 additional trains per day on Houston urban-core segments, below the numeric trigger, but on corridors with significant existing train traffic, dense residential development, and a documented blocked-crossing problem

Under 49 C.F.R. § 1105.7(f), the Board may require additional information regarding the proposed action's environmental effects. Given Houston's documented conditions, I request that OEA analyze these segments despite falling just below the numeric threshold and explain its scope determination in the docket.

3. Require complete Houston data and establish measured existing conditions

Houston projections have changed across multiple versions of the application. Projected merger-related truck traffic at Settegast Yard decreased from 516 additional trucks per day in the December 2025 application, to 360 in the April 2026 amended application, to 353 in the July 2026 errata. Appendix Q also projects a 20 percent increase in activity at Englewood Yard, from 2,044 to 2,456 cars per day, while the environmental yard table does not identify a Houston yard.

I ask that OEA require the applicants to reconcile these figures, provide a change log explaining material revisions, and clearly identify the assumptions underlying Houston projections.

The EIS should also establish existing conditions using measured data wherever available, including:

- Blocked-crossing frequency and duration, using crossing occupancy sensor data
- Locomotive horn events, including nighttime activity
- Nighttime noise at residential receptors, including yard operations
- Emergency response delays attributable to blocked crossings, developed in consultation with the Houston Fire Department, Harris County Emergency Services Districts, and the Harris County Fire Marshal
- Pedestrian exposure at crossings near schools. FRA reports include 11,634 instances describing pedestrians climbing over, under, or through stopped trains and 10,985 describing a blocked or delayed first responder

4. Analyze truck traffic, air quality, and community impacts

Even under the applicants' latest projections, Settegast Yard would experience a substantial increase in daily truck traffic. Those additional trips will occur on Houston and Harris County streets regardless of whether the trucks are operated directly by the railroads or by third-party partners.

The EIS should analyze truck volumes and routing associated with Settegast and Englewood, criteria pollutants and diesel particulate emissions, and cumulative impacts alongside existing industrial activity. The review should specifically evaluate impacts on residents in the East End and Fifth Ward, where rail, roadway, and industrial activity are already concentrated.

5. Ensure meaningful Houston participation in the environmental review

I respectfully request that OEA:

- Hold at least one in-person public meeting in Houston at an accessible location and time;
- Provide Spanish-language materials and live interpretation
- Consult directly with the City of Houston, Houston Fire Department, and Houston Police Department regarding emergency response, roadway, and land-use impacts
- Add the City of Houston, Harris County Precinct 2, and Texas House District 145 to the consultation distribution list
- Provide at least 45 days for public review and comment on the environmental analysis before it informs the Board's final decision

Houston residents have documented the effects of blocked crossings for years. If the scope stops at Tower 87, the EIS risks excluding the neighborhoods with the region's highest documented blocked-crossing burden and limiting the record available to consider meaningful mitigation.

I respectfully request that OEA ensure Houston's urban core and its most affected communities are fully included in this review.

Thank you for your consideration.

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