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

Re: Finance Docket 36873, Union Pacific-Norfolk Southern Merger - Request for Houston Public Hearing, Enhanced Environmental Analysis, and Community Mitigation

To Patrick Fuchs and Members of the Board:

I write to you as an At-Large member of the Houston City Council, representing the entire city of Houston. I appreciate the freight rail industry as critical for Houston's economy and for our Port. Having grown up alongside active rail corridors, I also have personally experienced the daily challenges that these operations catalyze for some of our communities. These challenges include that emergency vehicles are sometimes delayed by blocked crossings, commuters are too-frequently trapped by trains bisecting neighborhoods, and communities are physically separated for extended periods on a routine basis.

Given the magnitude of Houston's role in freight rail operations and the direct impact this merger will have on residents citywide, I respectfully request the following actions from the Surface Transportation Board:

1. A Public Hearing in Houston

I formally request that the STB conduct at least one public hearing in Houston, scheduled during evening or weekend hours to ensure working families can participate. The people of Houston deserve to testify in their own city about a merger that will reshape rail operations in their neighborhoods.

2. Transparent, City-Specific Impact Analysis

I request that the STB include comprehensive, Houston-specific impact projections that transparently address:

- Projected freight volume increases through Houston rail corridors
- Changes in train frequency and train length
- Impacts on at-grade crossing blockage duration
- Consequences for emergency response times and accessibility

Our residents deserve data-driven analysis.



3. Comprehensive System-Wide Impact Study

The CP-KCS merger review limited its analysis to merger-specific lines. In Houston, however, where rail interchanges occur at grade, trains on secondary lines must yield to priority traffic. This cascading effect is a primary driver of prolonged crossing blockages in communities like the East End, Fifth Ward, and neighborhoods throughout the city, where trains routinely obstruct crossings for thirty minutes or longer.

I request that the STB require a full system impact study examining:

- Secondary line operations and interchange delay patterns
- Cumulative effects of increased traffic across Houston's entire rail network
- At-grade crossing blockage frequency and duration
- Impacts on parallel roadways and detour routes

The limited scope of the previous merger review failed to capture the operational realities Houston residents face daily. I respectfully request that this review take a more comprehensive approach.

4. Robust Public Comment Process

I urge the STB to establish a substantive public comment period with adequate time for municipalities, community organizations, and residents to analyze merger impacts and provide detailed feedback. Additionally, I request that the Board give genuine consideration to input from local governments, especially cities like Houston that will experience direct operational consequences.

Conclusion

I have lived with trains. I absolutely understand their importance to our economy. I also understand the challenges they can present for the communities they pass through, including residents I represent. This merger will reshape American freight rail for generations. I respectfully urge the Surface Transportation Board to grant my requests enumerated above, and ensure that Houston residents have a genuine opportunity to participate in this review process.

Thank you for your consideration. I welcome the opportunity to discuss these concerns further and to work with the Board toward a thorough review.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Julian Ramirez".

Councilmember Julian Ramirez
Houston City Council, At Large 1