



Commissioner Adrian Garcia

Harris County Precinct 2

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310429

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Subject: Finance Docket 36873, Proposed Procedural Schedule Public Comment

To Patrick Fuchs and Members of the Board:

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Office of Chief Couns

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I write to you as Harris County Commissioner for Precinct 2, representing communities that have lived alongside freight rail operations for generations. I have a personal understanding of these impacts. I grew up in these neighborhoods, hearing trains throughout the night and watching crossings block access to schools and emergency services. As a Houston City Council Member, I fought for residents dealing with these same rail issues. Now, as County Commissioner, I continue that fight because the problems have only intensified.

My constituents experience the daily realities of rail traffic: blocked crossings that delay emergency services, disrupted commutes, degraded air quality, and neighborhoods physically divided by trains for extended periods. These are not abstract policy concerns for me—they are the lived experiences of the community that raised me and the families I have represented throughout my political career.

Today, those challenges are reaching a breaking point. In the East End, home to some of the hardest hit neighborhoods, **8 of the 10 most blocked rail crossings in the entire United States** are located right here. Every day, thousands of drivers sit idle at crossings, children risk their safety climbing over stopped railcars to get to school, and first responders can lose up to 10 minutes navigating delays when every second matters.

Harris County is not peripheral to this merger. We are central to it. As home to the nation's fourth largest city and a critical freight hub, our rail infrastructure is essential to the national supply chain. However, our residents also bear the burden of these operations, and they will be directly and significantly affected by the proposed Union Pacific Norfolk Southern merger.

This isn't just a safety and equity crisis. It's also an economic one. Over the next two decades, rail crossing delays in Houston alone are projected to cost an estimated **\$2.6 billion** in lost time, collisions, wasted fuel, and increased emissions. That is money our residents, our economy, and our communities cannot afford to lose.

Given Harris County's critical role and our community's substantial stake in this merger's outcome, I respectfully submit the following requests on behalf of my constituents:

1. A Public Hearing in Houston

During the Canadian Pacific-Kansas City Southern merger review, Harris County communities were inadequately engaged. The Surface Transportation Board held a public hearing in Beaumont on a weekday, making it nearly impossible for working Houstonians to participate.



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I 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. Our residents deserve the opportunity to testify before the Board in their own community about a merger that will significantly impact their daily lives.

2. Honest, Localized Infrastructure Impact Forecasts

Industry projections indicate that "the densest lanes are projected to emerge post-merger," yet Harris County has not received clear, localized predictions about what this means for our communities. Early analysis suggests the STB may deemphasize post-merger freight volume impacts to expedite the decision process. This is unacceptable.

I request that the STB require detailed, community-specific impact forecasts for Harris County 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 and environmental health impacts

3. Full System Impact Study

The CP KCS merger review focused its analysis solely on merger related lines. However, in Harris County, where interchanges are at grade, trains on secondary lines must wait for priority routes to clear. This cascade effect causes prolonged blockages in neighborhoods like the East End, Fifth Ward, and communities throughout Precinct 2, where trains regularly block crossings for 30 minutes or more, the same neighborhoods where I grew up watching these blockages disrupt daily life.

I 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 Harris County rail network
- At-grade crossing blockage patterns and durations
- Effects on parallel roadways and alternative routes
- Environmental and public health impacts from increased diesel emissions and idling trains



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

4. Meaningful Public Comment Period

I am submitting this letter early in the review process because I understand that late submissions, particularly those requesting extensions after deadlines have passed, do not meaningfully shape outcomes. Harris County's voice must be part of the conversation from the beginning, not as an afterthought.

I urge the STB to establish a robust public comment process with sufficient time for counties, cities, community organizations, and residents to analyze the merger's impacts and submit substantive feedback. Furthermore, I request that the Board give meaningful weight to local government input, particularly from jurisdictions like Harris County, which will experience direct operational impacts.

Conclusion

The communities I represent understand that freight rail is essential to our economy, but they also know firsthand how operational decisions made at the federal level create daily quality-of-life impacts at the local level. I have spent my entire life and career in these communities—from growing up alongside the tracks, to serving on City Council, to now serving as County Commissioner. For decades, I have witnessed how our neighborhoods bear the burden of rail operations without adequate consideration of their safety, health, and well-being.

This merger represents a transformative moment for American rail. Harris County must be part of the conversation, not as a footnote in a regional analysis, but as the major metropolitan area we are, with a voice in decisions that will shape our communities' future.

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

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

Respectfully,

Commissioner Adrian Garcia
Harris County Precinct 2