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The Honorable Patrick J. Fuchs
Chairman
Surface Transportation Board
395 E. Street, S.W.
Washington, D.C. 20423

Re: Finance Docket 36873 – Proposed Procedural Schedule Public Comment

To Chairman Fuchs and Members of the Board,

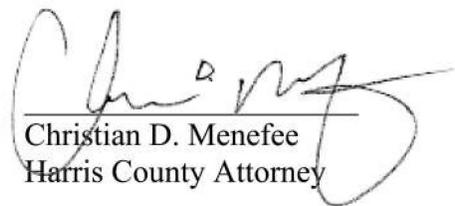
As Harris County Attorney, I request that the Surface Transportation Board (“STB”) conduct a comprehensive, rigorous, and transparent review of the proposed Union Pacific–Norfolk Southern merger to ensure that it demonstrates clear and tangible benefits to the public. Harris County residents live and work alongside some of the busiest rail corridors in the nation. With over five million residents, Harris County is the third-largest County in the US and a critical hub for freight movement. It is also one of the nation’s vital economic engines. While I understand the crucial economic benefits of freight rail to our community, the County’s residents also bear the consequences of rail operations: blocked crossings that delay emergency services, disrupted traffic patterns that affect commutes and commerce, and businesses and consumers that bear the burden of service breakdowns and increased costs due to a merger.

In light of the impact this merger will have on our community, I ask that at least one public hearing is held in Harris County, Texas. Residents, local officials, emergency-response agencies, labor and community organizations, businesses, and other interested stakeholders could then provide testimony directly to the STB. We also urge the STB to establish a robust public comment process that allows sufficient time for all stakeholders to thoroughly analyze the merger's impacts and submit meaningful feedback. This will allow you to appropriately evaluate the merits of the merger, and, if the merger were to go through, to alleviate the merger’s burden in our communities, addressing things like environmental protection, safety and accessibility, community investment, economic impacts, and operational improvements.

Ultimately, the STB must ensure that the merger preserves long-term competition and efficient, economically viable rail service while also minimizing the burden our community will face. We should not be forced to tolerate service breakdowns, safety lapses, or higher prices because of this deal.

We thank you for the important work you will do in evaluating this merger application, and we look forward to working with you to ensure the STB hears from Harris County.

Sincerely,



Christian D. Menefee
Harris County Attorney