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VIA ELECTRONIC FILING

Chairman Patrick Fuchs
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. - Resident Comments on the Significance of Blocked Rail Crossings*

To Chairman Fuchs and members of the Surface Transportation Board:

I am a resident of Houston, Texas, living in Second Ward near Union Pacific rail lines that run through my community. I am writing to ask the Board to take blocked rail crossings seriously as it evaluates the proposed merger between Union Pacific and Norfolk Southern.

My experience

Just last night (around 8 pm, May 28, 2026) while heading to the only grocery store in a five mile radius from my house, train blockage at Sampson Street heading south required me to detour 15 minutes to arrive at the store. Likewise on my return after shopping, train blockage heading north on York Street required me to take a similar detour. What would have normally been less than a 10 minute round trip took over 30 minutes.

This example was going to a destination where an alternative route with available grade separations in the evening with little traffic. At many other locations in my neighborhood, alternative routes aren't available, such as at Runnels Street or Clinton Drive. Due to damage to the drain at the Franklin Street rail underpass, the underpass now floods after light rain so there is no alternative route when the train stops completely across Commerce Street, as happened with myself and a neighbor during the week of May 18, 2026.

Other frequent destinations require me to detour around the line that runs through Sampson, York, Lockwood, Adams and further east. On one particular occasion about a year ago on my way to the gym I frequent, a unit-plus train was at a dead stop all through those grade crossings and when I finally got around that train, another train was at a dead stop across Lawndale (which happens daily, and in a school zone). Already 30 minutes late for what is normally an eight minute drive, I canceled the appointment with my trainer, turned around and drove home.

When my children were still in car seats, they would gleefully cheer "Train!" when they saw our way blocked, especially westbound on Commerce Street, warning me to detour before getting stuck at the crossing. They're now in their late twenties. This has been going on for all of the twenty-plus years we've lived in Second Ward.

Additionally, professionally I am a multi-modal shipper. While shipper rates may not be part of this specific review, Union Pacific's public relations spin around the merger promotes that the merger will result in lower rates. It will not. Indeed, UP's merger with Southern Pacific resulted in chaos in the Gulf region, service and reliability declined, rates went up and, pertinent to these comments, grade crossings increased exponentially. Trains at a dead stop at grade crossings happened but were uncommon prior to the UP-Southern Pacific merger. That happens multiple times a day now in Houston's East End. UP does such a bad job of managing stoppages now, there is nothing to suggest their management would be any better after doubling train lengths and increasing the number of trains thirty percent post-merger.

Why this matters in our community

Blocked crossings pose public safety risks to our community. They delay emergency response times for fire, EMS, and police. They cut off access to schools, medical facilities, and workplaces. They affect residents' ability to move through their own neighborhood on foot or by car, including elderly neighbors and parents with small children.

The East End and surrounding Houston neighborhoods already bear a disproportionate share of freight rail impacts. We have lived alongside these tracks for generations. As I've mentioned, I've lived here for a full generation myself and remember how rail traffic was managed prior to the UP-Southern Pacific merger. This proposed merger is projected to grow freight volumes through our community, and growth in train counts and train length translates directly into more frequent and longer blockages at the at-grade crossings we depend on every day.

The Applicant's position should not control the Board's review

In their May 12, 2026, reply on completeness (UP-51/NS-49, Section XI), Applicants take the position that blocked crossings are appropriately addressed only through the Board's environmental review process under 49 C.F.R. § 1180.8(a)(2). I disagree with treating this as a procedural punt to a separate, slower track.

Environmental review on its own does not produce enforceable operating conditions on the merged railroad. A meaningful response to blocked crossings requires conditions imposed at the time of merger approval, with measurable reporting requirements and a real enforcement mechanism. Without those, communities along the line have no practical recourse when blockages happen.

The Board has clear authority under 49 U.S.C. § 10101 and 49 U.S.C. § 11324(c) to impose conditions necessary to protect the public interest, including conditions addressing community impacts of a proposed control transaction. Approving this merger without addressing blocked crossings in densely populated communities would consolidate freight rail control through our neighborhood without corresponding accountability.

Conditions I respectfully request

I ask that the Board:

1. Treat blocked crossings as a substantive issue in this proceeding, in addition to the environmental review process.
2. Require Applicants to disclose, by neighborhood and by crossing, projected post-merger frequency, duration, and timing of blockages at at-grade crossings in densely populated communities along their lines, including the East End of Houston.

3. Condition any approval of the proposed transaction on enforceable measures to reduce blocked crossings, including:
 - a. A requirement that Applicants share real-time train movement information with local emergency services and 911 dispatchers.
 - b. Public quarterly reporting on blockage frequency and duration at identified high-impact crossings.
 - c. A dedicated regional point of contact and complaint process for affected residents and local governments.
 - d. Investment in grade separation, signaling improvements, or other mitigation at crossings the Board identifies as posing the greatest public safety risk.

Closing

Thank you for your consideration. I am happy to provide additional information about my experience or the impacts on my neighborhood if it would assist the Board's review.

Respectfully submitted,

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cc: Parties of Record

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of May, 2026, the foregoing comment was filed electronically with the Surface Transportation Board through its e-filing system, and was sent to all parties of record in this proceeding.

Scott Singleton
Submitted electronically