

Lindsay Williams
1322 Milby St.
Houston, TX 77003
williams Lindsay123@gmail.com

July 6, 2026

Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423

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Office of Chief Counsel
July 6, 2026
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Public Record

Re: Finance Docket No. 36873, Union Pacific Corporation and Norfolk Southern Corporation Control and Merger
Comment on the Applicants' Proposed Blocked Grade Crossing Mitigation

To the Members of the Board:

I am a resident of the Eastwood neighborhood in Houston's East End, where blocked grade crossings caused by Union Pacific operations are a daily reality. I respectfully ask the Board to carefully evaluate the blocked-crossing mitigation measures proposed in the Applicants' Safety Improvement Plan and to require enforceable conditions before approving the merger. The most effective condition would be to establish a limit on train length within the Houston rail complex.

The problem begins with geometry, and the real life impact of mega trains.

The East End terminal was built as a lattice of closely spaced control points, still known by their historic "Tower" designations. The distance between adjacent towers is short. When a train is longer than the segment between the towers where it can be routed or held, it cannot pull clear of the road crossings inside that segment. It sits across neighborhood streets and waits, often while another train passes. Union Pacific now runs trains longer than these segments, so the blockages are built into the operation.

The region's own planning record confirms this. The Texas Department of Transportation's Houston Region Freight Study found that delay is "caused by a lack of long sidings without interior road crossings," and that on the East Belt "both main tracks in this area are cut by road crossings and therefore trains cannot hold between Double Track Junction and Tower 86 to meet or pass other trains." The study treated a 7,200-foot train as the modern concern. Union Pacific's average is now 9,729 feet, a record it reported for the fourth quarter of 2025, and still rising. At Englewood Yard, the usable build-and-departure length is about 5,000 feet. Yet, trains are assembled there as long as 15,000 feet. A train that long cannot fit the yard that builds it, and its tail sits across neighborhood crossings for as long as it takes to assemble and test, which can be many hours.

Three corridors show what this does to specific neighborhoods. On the East Belt between Tower 85 and Tower 86, about 1.8 miles, a stopped train blocks the crossings serving KIPP Explore Academy at 5402 Lawndale Street, where children walk to school and have been seen passing between the cars of stopped trains. Between Tower 86 and Tower 87, about 2.9 miles, the line runs past Englewood Yard through Fifth Ward and Kashmere Gardens, the state-designated cancer cluster, at what the study calls "by far the most congested rail interchange within the Houston Terminal." At the South Yards near my own home, the West Belt, Glidden, and Mykawa lines converge around the Old South, New South, and Congress Yards with little grade separation, where a single long train blocks multiple streets at once and cuts emergency access across the near East End.

Shorter trains would relieve much of this. A train that fits between the control points can pull clear to let another pass, which is what keeps the terminal fluid. Reducing train length in the Houston complex would ease a significant share of the congestion these neighborhoods now absorb.

Blocked-crossing monitoring is not, by itself, mitigation, and Houston is subject to a less protective standard.

The Applicants' Safety Improvement Plan primarily describes systems that Union Pacific already operates, including RMCC reporting, the Tableau monitoring platform, and a blocked-crossing alert process. Despite these measures, Union Pacific accounted for approximately 40 percent of all blocked-crossing complaints reported through the federal system in 2025—10,521 of 26,131 nationwide.

Moreover, Houston is subject to a less protective version of the company's alert process. For critical crossings in Houston, the initial alert is not generated until a crossing has been blocked for twenty minutes, and emergency responders are not notified until thirty minutes.

This directly conflicts with the ten-minute alert threshold described elsewhere in the Applicants' plan.

Building around the problem will not scale.

The scale and cost of grade separation projects underscore why operational mitigation is necessary. A City of Houston review identified 69 critical at-grade crossings. Grade separations typically cost \$175 million to \$190 million or more and often require decades to plan and construct. Current estimates place the Lockwood Drive grade separation at approximately \$175 million and the West Belt Improvement project at Sampson Street, York Street, and Commerce Street at more than \$190 million. Separating the City's 35 highest-priority crossings

alone would require investment on the order of \$6 billion. Union Pacific routinely balks at contributing to solutions to alleviate congestion caused by its operational decisions.

By contrast, a train-length limit could provide more immediate relief with little or no public expenditure.

The Board has previously exercised its authority under 49 U.S.C. § 11324 to impose merger conditions addressing these concerns, including in Houston. In its 2023 decision in Finance Docket No. 36500, the Board stated that it had "paid particular attention to community concerns about train lengths," required trains to "avoid blocking public crossings longer than ten minutes," and observed that it "stands ready to issue supplemental orders addressing capacity and maintaining fluidity in Houston." The projected post-merger average train length in that proceeding was 7,726 feet. By comparison, Union Pacific's average train length is approximately 9,729 feet and has continued to increase.

Because the environmental review is held in abeyance, the comment record is the only chance to secure protection. I ask the Board to require these conditions before any approval:

- 1.** Apply the ten-minute alert standard uniformly across the entire network, including all critical crossings in Houston, and reduce the emergency-responder notification threshold accordingly.
- 2.** Require independent, publicly accessible reporting of blocked-crossing duration and frequency by location, verified by a third party rather than self-reported through the company's internal Tableau site.
- 3.** Set binding numeric reduction targets against a documented pre-merger baseline, with a defined timeline and financial penalties for failure to meet them.
- 4.** Require a pre-merger baseline study and ongoing post-merger monitoring of crossings in affected residential neighborhoods, including the East Belt corridors, especially around schools, and the Fifth Ward and Kashmere Gardens, with results filed with the Board.
- 5.** Require a specific, location-level mitigation plan for the additional blocked crossings that the Applicants acknowledge the merger may cause, to be submitted and reviewed before approval, rather than after.
- 6.** Review and limit train length for the Houston terminal complex. Require the Applicants to demonstrate that the Houston complex can absorb projected post-merger traffic at current train lengths without increasing blocked crossings. If they cannot make that showing, cap train length for the Houston terminal complex at no more than 7,500 feet, a length close to what the plant was built to hold, below the company's own 9,729-foot system average, and short enough to let trains hold in existing sidings and meet or pass without fouling road crossings, which is what keeps the network fluid. Prohibit the holding or staging of any train

longer than the control-point segment it occupies until the grade separations and siding extensions needed for longer trains are funded and built, and require the Applicants to file the supporting segment-by-segment analysis by control point.

The Applicants describe their current operating and monitoring practices in detail. However, those descriptions do not demonstrate how post-merger operations will avoid worsening blocked-crossing impacts, nor do they include commitments tied to measurable performance outcomes.

Actually, Applicants acknowledge that the proposed merger could increase blocked crossings in communities expected to experience higher rail traffic, including Houston. As stated in EI-3460:

"Applicants have identified specific corridors across the combined UP/NS network where rail traffic is expected to increase as a result of optimizing the combined network and increased traffic drawn to the combined network's offerings. Applicants recognize that this increased traffic, and other operational changes, may result in additional blocked crossings. As described below, Applicants each have established practices to address such occurrences."

This acknowledgment highlights the distinction between describing existing practices and committing to future outcomes. While the Applicants explain how they currently respond to blocked crossings, they do not commit to preventing or reducing increases in blocked crossings that may result from post-merger operations, nor do they propose performance standards to ensure that affected communities are not disproportionately impacted.

I respectfully ask the Board to provide those assurances through enforceable merger conditions, so that communities affected by this rail network are protected by clear, enforceable performance requirements rather than commitments to continue monitoring existing conditions.

Respectfully,



Lindsay Williams
1322 Milby St.
Houston, TX 77003
williams Lindsay123@gmail.com

Attached:

Exhibit A: How Longer Trains Block East Houston, by Corridor

Exhibit B: Source Appendix

CC: All Parties of Record

Exhibit A: How Longer Trains Block East Houston, by Corridor

STB Docket No. FD 36873

The point in one sentence: Union Pacific now runs trains that are longer than the distance between the control points where those trains can be routed or held in East Houston, so a stopped train blocks several road crossings at once, on the specific corridors that serve a school and the Fifth Ward and Kashmere Gardens cancer cluster.

Context: Houston files the largest share of the nation's blocked-crossing complaints, and a City of Houston project found that the great majority of the city's blocked crossings occur in the East End, nicknamed the Railroad Landing Strip.

The yards and control points at issue

The East End terminal is a dense cluster of classification yards linked by short segments between control points, still identified by their historic "Tower" designations and used operationally today. The yards in question are Settegast Yard, Englewood Yard, Congress Yard, Old South Yard, and New South Yard. The three corridors below carry the heaviest burden.

Corridor (control points)	Yards/junctions	Active line and segment length	What is at stake
1. South Yards cluster (Tower 117 area)	New/Old South Yards, Congress Yard, T&NO Junction (Tower 81)	West Belt, Glidden, and BNSF Mykawa lines converge (West Belt carries 65 to 75 trains daily)	Emergency access across the near East End near Milby Street; limited grade separation
2. East Belt Tower 85 to Tower 86	Booth Yard, Basin Yard	about 1.8 mi (9,504 ft)	KIPP Explore Academy, 5402 Lawndale St; children walk to and from school across these crossings
3. East Belt Tower 86 to Tower 87	Englewood Yard (Liberty Rd & Wayside Dr), Settegast Yard	about 2.9 mi (15,312 ft)	Fifth Ward and Kashmere Gardens, the state-designated cancer cluster; Tower 87 is the terminal's most congested interchange

Segment lengths for corridors 2 and 3 are derived from the mileposts in the TxDOT Houston Region Freight Study (Tower 85 at MP 9.40, Tower 86 at MP 7.60, Tower 87 at MP 4.70 on the

East Belt). Crossing-level details reflect resident and East End Rail Safety Task Force documentation and should be paired with the FRA crossing list when filed.

By the numbers

Length the Houston plant was built to hold (TxDOT benchmark)	about 7,200 ft
Proposed cap for the Houston terminal complex	7,500 ft
Union Pacific system average train length (Q4 2025 record)	9,729 ft
Usable build and departure length at Englewood Yard	about 5,000 ft
Trains built at Englewood, as reported by UPRR operations during an H-GAC tour of Englewood yard	up to 15,000 ft
East Belt segment serving KIPP Explore Academy (Tower 85 to 86)	9,504 ft
East Belt through the cancer cluster (Tower 86 to 87)	15,312 ft

A 15,000-foot train built in a 5,000-foot yard leaves roughly two miles of train hanging onto the main line and across neighborhood crossings while it is assembled and brake-tested. The proposed 7,500-foot cap sits close to the length the plant was built to hold and below the company's own system average.

Modern train length, for comparison

- TxDOT study benchmark: a “long” modern train of 120 cars, 12,000 tons, and 7,200 feet, already described as long enough to “block an entire set of switches.”
- Government Accountability Office: average train length up roughly 25 percent since 2008; some trains reached almost 14,000 feet (about 2.6 miles) by 2021; railroads regularly run trains over 12,000 feet and over 16,000 feet.
- A train of 14,000 to 16,000 feet is longer than the East Belt segment serving KIPP Explore Academy (9,504 feet) and about the length of the Tower 86 to Tower 87 segment through the cancer cluster (15,312 feet). Held on either segment, it blocks all crossings on that segment at once.

What the region's own study already found

- Delay is “caused by a lack of long sidings without interior road crossings.”
- On the East Belt, “both main tracks in this area are cut by road crossings, and therefore trains cannot hold between Double Track Junction and Tower 86 to meet or pass other trains.”

- Tower 87, at Englewood Yard, is “by far the most congested rail interchange within the Houston Terminal.”

Why a length cap, not just grade separations

The usual fix for a blocked crossing is a grade separation. It does not scale in the Houston complex. The study or design phase alone runs \$13 to \$24 million per crossing, and construction runs \$175 to \$190 million or more. Grade-separating the City’s 35 priority crossings would cost on the order of \$6 billion to build, before design and land acquisition, and would take decades. A train-length cap delivers relief now, at almost no public cost.

Railroad crossings in Houston	403
Critical crossings (City review): 107 regional, 69 in Houston	City focus: top 35
Study or design phase, per grade separation	\$13M to \$24M
Construction, per grade separation	\$175M to \$190M+
Grade-separating the City’s 35 priority crossings (construction only)	on the order of \$6B
FRA grant to study (not design or build) 14 East End crossings, 2025	\$2M
Train-length cap for the Houston complex	relief now, minimal capital cost

Real Houston projects: Lockwood, about \$13M to study and roughly \$175M to build; Leeland at Cullen (West Belt), about \$24M for design, construction not yet estimated; West Belt Improvement (Sampson, York, Commerce), over \$190M to build. The dollars secured so far are for study and design, not construction.

Examples, but not an exhaustive list, of critical crossings: Milby Street; Broadway Street (East End), where a Milby High School student was struck and killed by a train in December 2024; Telephone Road; Lockwood Drive; Polk Street at the East Belt; and Fry Road at Hempstead Road in northwest Houston.

The Board has done this before, and named Houston

- In the 2023 CPKC merger (FD 36500), the Board “paid particular attention to community concerns about train lengths,” collects train-length data “so that the agency can monitor community concerns about blocked crossings,” and required trains to “avoid blocking public crossings longer than ten minutes.”
- In that case, the projected post-merger average train length was 7,726 feet, nearly the cap requested here. Union Pacific’s average is 9,729 feet and rising.

- The Board said it “stands ready to modify the required environmental mitigation measures and to issue supplemental orders addressing capacity and maintaining fluidity in Houston,” and required a Houston community liaison. In CN/EJ&E (FD 35087, 2008) it required about \$100 million in mitigation, including grade-crossing measures.

The ask

The Board should require the Applicants to demonstrate that the Houston terminal complex can accommodate projected post-merger traffic at current train lengths without increasing the number of blocked crossings. If they cannot, the Board should cap the train length for the Houston complex at no more than 7,500 feet and prohibit staging any train longer than the control-point segment it occupies until the grade separations and siding extensions needed for longer trains are funded and built.

This is a measure of fluidity, not just a safety one. A train longer than the siding it is assigned to cannot pull in clear of the main line to let another train pass, so it holds on the main and across the crossings. Trains that fit the plant keep the Houston network moving. Trains that do not lock it up, and the neighborhoods absorb the difference.

Anticipated objections and responses

Anticipated objection	Response
“Train length alone is not a driver of incident rates.”	That measures injuries and derailments, not blocked crossings. The harm here is emergency access and blocked crossings, which are a function of train length and plant geometry. The Board itself treats train length as a blocked-crossing concern.
“You cannot single out one terminal; train length is a system decision.”	The railroads already vary train length by location. Union Pacific’s Physics Train Builder builds “the right train for the route, the terrain.” About 75 percent of trains are already under 7,500 feet, and in the CPKC merger the projected post-merger average was 7,726 feet. A Houston terminal limit is ordinary, and the Board said it would specifically address Houston capacity and fluidity.
“Fewer, longer trains mean fewer trains and fewer blockages.”	A single 15,000-foot train blocks more crossings at once, and for longer, than two 7,500-foot trains that can each clear, and long trains cascade into “four or five trains sitting.” Emergency access depends on total blockage time and simultaneous blockage, not train count. Union Pacific’s average length is rising, not falling.
“Grade separations, not operating limits, are the fix.”	Grade separations cost \$175 to \$190 million or more each and take decades. Houston has 69 critical crossings; the top 35 alone would cost on the order of \$6 billion.

Anticipated objection	Response
	Communities cannot wait. A length cap delivers relief now, at almost no cost.
“Federal law preempts local train-length rules.”	That is why the request goes to the Board, not the City. Under 49 U.S.C. 11324, the Board may condition a merger, and it has imposed crossing and train-length conditions before (CPKC ten-minute rule and train-length data; CN/EJ&E about \$100 million in mitigation).

Sources

1. Texas Department of Transportation, Houston Region Freight Study (Existing Conditions and Freight Rail Operations Model). Mileposts, yard locations, and quoted findings.
2. Union Pacific, “Moving More with Less: The Reality of Modern Rail,” June 25, 2026. up.com/news/safety/moving-more-with-less-260625. Average train length of 9,729 feet from Union Pacific Fourth Quarter and Full Year 2025 Results, a company record; the company reported another train-length record in the first quarter of 2026.
3. U.S. Government Accountability Office, “Rail Safety: Freight Trains Are Getting Longer,” GAO-19-443, and related GAO reporting on train length and blocked-crossing complaints.
4. Texas Interlocking Towers records (txrrhistory.com) for the identity and location of Towers 84, 85, 86, 87, 116, and 117.
5. KIPP Explore Academy, 5402 Lawndale St, Houston, TX 77023. Fifth Ward and Kashmere Gardens cancer cluster, Texas Department of State Health Services and City of Houston Health Department.
6. Federal Railroad Administration, Blocked Crossing Incident Reporter data.
7. “Railroad safety bill could decrease the number of blocked train crossings in Houston,” Houston Public Media, May 16, 2023 (East End leads the nation in blocked crossings; roughly 90 emergency diversions per month).
8. “\$2 million grant secured to study impact of railroad crossings on safety in Houston’s East End,” KPRC Click2Houston, January 10, 2025 (East End Triangle R.A.I.L.S. Plan, 14 crossings; December 2024 death of Milby High School student on Broadway Street).
9. Houston Safe Railroad Corridors, 2025, Jack C. Hanagriff, Houston Smart City Program, Office of Innovation and Performance (107 critical crossings regionally, 69 in Houston, top 35 prioritized; Houston is the largest share of Texas blocked-crossing complaints).
10. City of Houston Smart Railroad Crossings Project / TRAINFO White Paper, April 2024 (403 crossings in Houston; the great majority of the city’s blocked crossings occur in the East End, nicknamed the Railroad Landing Strip; blockages up to 14 to 20 hours; the overpass solution costs millions and takes decades).

11. Per-project grade-separation costs (Lockwood, Leeland at Cullen, West Belt Improvement) from current Houston-area project budgets; confirm exact figures with the Gulf Coast Rail District or the City before filing.

Exhibit B: Source Appendix

STB Docket No. FD 36873

Each figure and quotation used in the comment and exhibit is listed below with its source. Study page references are to the Texas Department of Transportation Houston Region Freight Study.

Train length and railroad operations

#	Figure or statement	Source and location
1	Union Pacific average train length of 9,729 feet, a company record, with another train-length record in the first quarter of 2026.	Union Pacific, "Union Pacific Reports Fourth Quarter and Full Year 2025 Results," Jan. 27, 2026, and "First Quarter 2026 Results," Apr. 23, 2026 (productivity metrics).
2	"Moved more freight with fewer trains, reducing active train count by 24% while increasing car velocity by 8%."	Union Pacific, "Moving More with Less: The Reality of Modern Rail," June 25, 2026.
3	"Train length alone is not a driver of incident rates."	Union Pacific, "Moving More with Less," June 25, 2026.
4	Average train length up roughly 25% since 2008; some trains near 14,000 feet by 2021; railroads operate trains over 12,000 and over 16,000 feet; about 25% of trains exceed 7,500 feet; blocked-crossing complaints rose with train length.	U.S. Government Accountability Office, "Rail Safety: Freight Trains Are Getting Longer," GAO-19-443, May 2019.

Houston plant geometry (TxDOT Houston Region Freight Study)

#	Figure or statement	Source and location
5	East Belt control points: Tower 85 at MP 9.40, Tower 86 at MP 7.60, Tower 87 at MP 4.70 (segment lengths of 1.80 mi and 2.90 mi).	Existing Conditions, East Belt Subdivision, p. 4-11.
6	Delay "caused by a lack of long sidings without interior road crossings."	Freight Rail Operations Model, p. 5-8.
7	A departing train "might be 120 cars long, weigh 12,000 tons, and stretch for 7,200 feet," long enough to "block an entire set of switches" and leave "four or five trains sitting;" brake test "can take 45 minutes or more."	Freight Rail Operations Model, p. 5-9.

#	Figure or statement	Source and location
8	“Both main tracks in this area are cut by road crossings and therefore trains cannot hold between Double Track Junction and Tower 86 to meet or pass other trains.”	Freight Rail Operations Model (Planning Case 1), p. 5-10 to 5-11.
9	Tower 87 is “by far the most congested rail interchange within the Houston Terminal.”	Identified Improvements, p. 8-155.
10	West Belt Subdivision carries 65 to 75 trains daily; New South, Old South Yards along about four miles of the West Belt.	Existing Conditions, West Belt Subdivision, p. 4-38 to 4-39.

Control-point (Tower) identities

#	Figure or statement	Source and location
11	Identity and location of Towers 84, 85, 86, 87, 116, and 117.	Texas Interlocking Towers records, txrrhistory.com.

Board authority and precedent

#	Figure or statement	Source and location
12	The Board may attach conditions to its approval of a control transaction.	49 U.S.C. 11324.
13	The Board “paid particular attention to community concerns about train lengths;” projected post-merger average train length of 7,726 feet, down from about 9,551 feet; required trains to “avoid blocking public crossings longer than ten minutes;” collects train-length data “so that the agency can monitor community concerns about blocked crossings;” “stands ready to ... issue supplemental orders addressing capacity and maintaining fluidity in Houston ...;” required a Houston community liaison; seven-year oversight period.	STB, Canadian Pacific / Kansas City Southern, Finance Docket No. 36500, decided Mar. 15, 2023 (STB press release PR-23-07 and decision).
14	Approved the transaction with conditions after requiring roughly \$100 million in environmental mitigation negotiated with local governments or ordered by the Board, including grade-crossing measures, following a full environmental impact statement.	STB, Canadian National / EJ&E, Finance Docket No. 35087, decided Dec. 24, 2008.

Crossings, community impact, and cost

#	Figure or statement	Source and location
15	Houston has 403 railroad crossings; the great majority of the city's blocked crossings occur in the East End, nicknamed the "Railroad Landing Strip;" blockages last 14 to 20 hours; three East End fire stations can be boxed in; the overpass solution "requires millions of dollars, and sometimes decades of waiting," and "may not be viable."	City of Houston Smart Railroad Crossings Project / TRAINFO White Paper, April 2024, pp. 4-5.
16	107 critical crossings regionally, 69 in Houston, City focus on the top 35; Houston is the largest share of Texas blocked-crossing complaints (over 70%), roughly eight times the next-highest city; Houston Fire Department logged more than 100 blocked-crossing reports a month in 2025; Scott Street is Houston's most collision-prone crossing.	Houston Safe Railroad Corridors, 2025, Jack C. Hanagriff, Houston Smart City Program, Office of Innovation and Performance.
17	East End leads the nation in blocked crossings; the Fire Chief reported roughly 90 emergency responses a month affected by blocked trains; 1,300 of Texas's 2,800 railroad complaints came from Houston's East side; the "train trap triangle."	"Railroad safety bill could decrease the number of blocked train crossings in Houston," Houston Public Media, May 16, 2023.
18	\$2 million FRA grant to study (not design or build) 14 East End Triangle crossings under the R.A.I.L.S. Plan; 20% local match; part of a \$79.2 million national round; December 2024 death of Milby High School student Sergio Rodriguez on Broadway Street.	"\$2 million grant secured to study impact of railroad crossings on safety in Houston's East End," KPRC Click2Houston, Jan. 10, 2025.
19	Grade-separation costs: Lockwood, about \$13M to study and roughly \$175M estimated to build; Leeland at Cullen (West Belt), about \$24M for design; West Belt Improvement (Sampson, York, Commerce), over \$190M to build.	Current Houston-area project budgets; to be confirmed with the Gulf Coast Rail District or the City of Houston.
20	KIPP Explore Academy, 5402 Lawndale Street, Houston, TX 77023.	KIPP Texas Public Schools.
21	Fifth Ward and Kashmere Gardens designated cancer cluster.	Texas Department of State Health Services; City of Houston Health Department.

#	Figure or statement	Source and location
22	FRA Blocked Crossing Incident Reporter received 26,131 reports in 2025, of which 10,521 involved Union Pacific.	Federal Railroad Administration, Blocked Crossing Incident Reporter (confirm current totals before filing).

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of July, 2026, the foregoing document was served to all parties of record to this proceeding.

/s/ Lindsay Williams