

BEFORE THE
SURFACE TRANSPORTATION BOARD

FINANCE DOCKET NO. 36873

UNION PACIFIC CORPORATION AND
UNION PACIFIC RAILROAD COMPANY
—CONTROL—
NORFOLK SOUTHERN CORPORATION AND
NORFOLK SOUTHERN RAILWAY COMPANY

**COMMENTS OF
BROOKLYN ACTION CORPS**

Brooklyn Neighborhood in Portland, Oregon is the home of Union Pacific's Brooklyn Yard, and Brooklyn Action Corps is the neighborhood association that represents the community.

We value rail transportation and the benefits that come with it, after all, the railroad has been an important part of our neighborhood's history since the 1860s. Many of us live in homes originally built more than a century ago for workers at this important hub.

Unfortunately, increasing activity at Brooklyn Yard, coupled with longer and longer train lengths, means rail operations have degraded air quality and become extremely disruptive to the flow of people and traffic in our community, especially in recent years.

According to data provided by TrainSnap Inc., which monitors the intersection at SE 12th Ave, cumulative gate-down time for blocking events exceeding 5 minutes averaged 3.5 hours per day during the month of June 2026. Data for previous months shows this is not an anomaly, indicating an ongoing and persistent issue.

It is clear that Union Pacific (UP) views our urban road crossings as an extension of Brooklyn Yard. Trains frequently block the roadway in excess of an hour, often sitting at a standstill. In the case of the crossing at SE 11th Ave, there is no legal path of escape for vehicles blocked by the train. With typical duration blockages, it is an afternoon-altering event— not being a few minutes late to an appointment, but missing the appointment altogether.

All three of these crossings near our neighborhood at SE 8th, SE 11th, and SE 12th Ave are busy, critical to the movement of people and goods, and are highly impacted by blockages. A map is presented as Appendix A for convenience. The crossing at SE 8th Ave is on the route for Portland's first branded "Frequent Express" bus line, which is on regular reroute due to trains

blocking, substantially impacting transit. The crossing at SE 12th Avenue is a critical connection for pedestrian and bicycle access to MAX light rail, which shares the crossing with UP and has a station located on the south side of the tracks at that intersection. The primary bicycle connection between the bikeway running parallel and south of the tracks to the Clinton street neighborhood greenway north of the tracks is also SE 12th Avenue. Many of these services and connections were designed at a time when crossing impacts were less severe, but as UP increases blockages, these important connections are severed.

Due to excessively long wait times at these crossings, many people attempt to race the train when the warning bells sound. Others climb between cars when the trains are stopped in the crossings. These actions can have fatal consequences.

It is reasonable to expect the railroad to make capital investments to ensure yard capacity is sufficient to handle all activity, rather than divert impacts to the surrounding area. UP has made some changes, and even accepted public money to do so, but those have been woefully inadequate.

There are solutions to the problem. UP could use Brooklyn Yard to only serve trains of a length that can be accommodated without disruption to adjacent crossings. Alternatively, if UP wishes to continue serving longer trains, they could expand infrastructure south of the yard along OR 99E, ensuring tracks used to make up trains at the intermodal yard are sufficiently long to accommodate their desired length. Changes could also be made at 8th, 11th, and 12th avenues to grade separate, but that area is more complex and any solution must include unimpeded pedestrian and bicycle access, equal to the quality of an unblocked crossing of the current configuration in all three areas.

Knowing that a merger with Norfolk Southern will increase activity at Brooklyn Yard by more than 20%, and acknowledging the continued lack of necessary investments on the part of UP to effectively mitigate impacts to the surrounding community, we are concerned about the merger unless it is made conditional upon resolving the root cause of blockages associated with routine yard operations.

Further, based on the environmental review information to-date, particularly UP's "Blocked Crossing Reduction Program" submitted per 49 C.F.R. § 1180.8(a)(2) in comment ID EI-34241, we question the sufficiency of the 8 short pages to describe how the railroad would deliver actual results to reduce blocked crossings. Indeed, assuming the program is currently active, results are not satisfactory to our neighborhood given the frequency and duration of delays.

Although the program plan states that UP "pays special attention to crossings that are most at risk of being blocked i.e., the crossings that are most reported by the public" by using Emergency Notification Sign (ENS) reports, a reports-based approach alone to determine areas

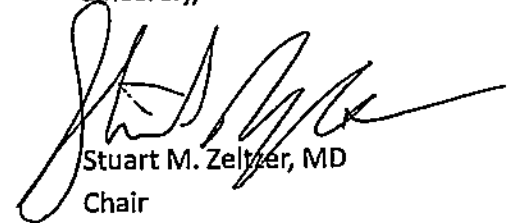
of focus is not reliable. The data depends upon called-in complaints of blockages to a number that appears to be designated for emergencies. Blockages are a daily experience in our neighborhood, not considered emergencies, and clearly a part of regular operations. Hence blockages are often unreported by this method. We would expect UP to consider these targeted crossings and use reliable methods such as the Positive Train Control-Global Positioning System (PTC-GPS) to continually assess conditions.

We request that the STB collect from UP, review, and publish for the record the relevant PTC-GPS data detailing blockage frequency and duration associated with these crossings. We find that blockages are already excessive and an increase of any amount will further strain these areas.

In other words, we feel these crossings must be evaluated in detail during environmental review and concrete, verifiable, and enforceable improvements must be part of any merger agreement to ensure trains remain moving at reasonable speed through these crossings at all times and do not standstill or reverse direction for multiple hours each day which is the already untenable status quo.

Dated: Portland, Oregon
July 13, 2026

Sincerely,

A handwritten signature in black ink, appearing to read 'Stuart M. Zeltzer', is written over the printed name.

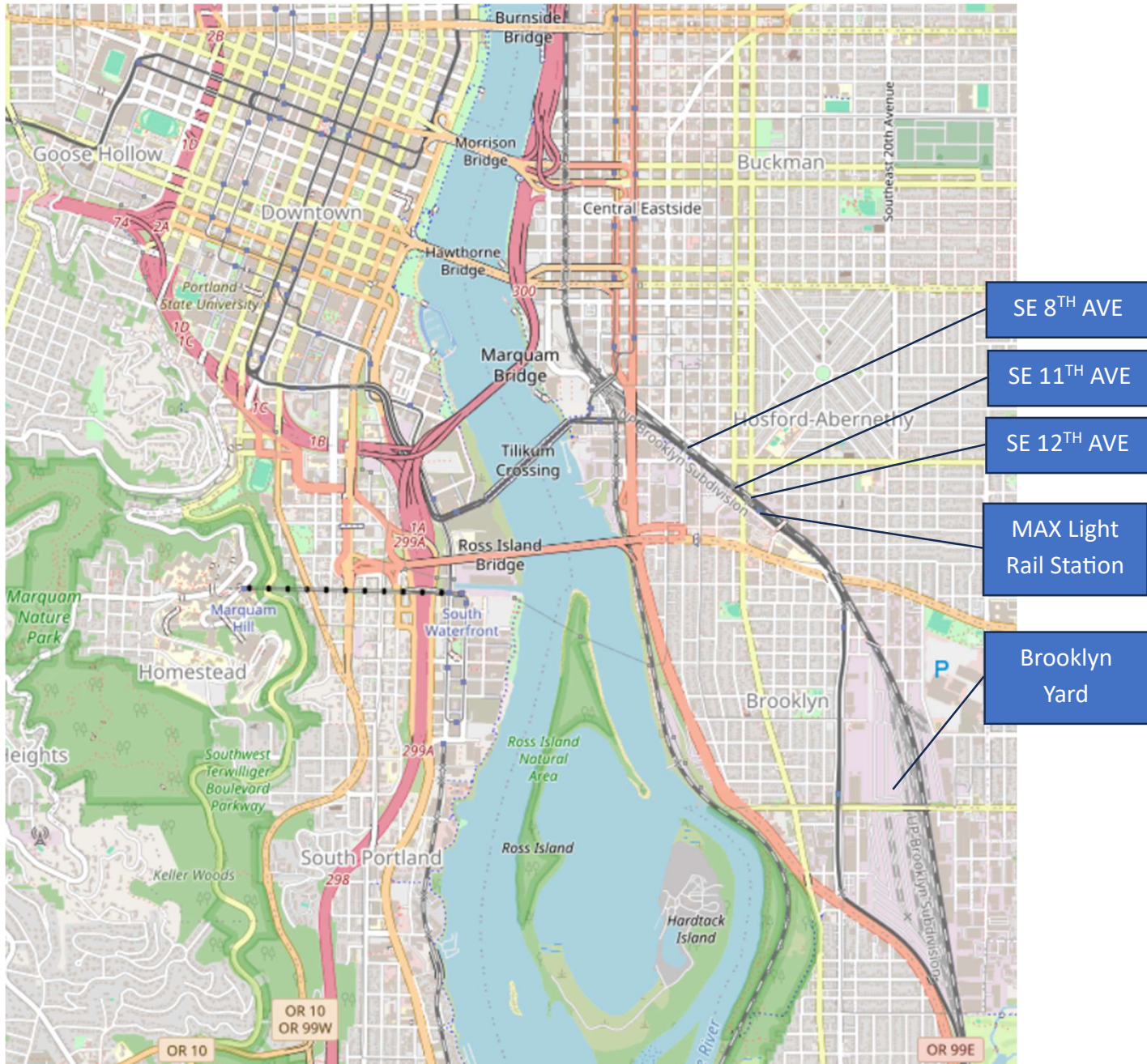
Stuart M. Zeltzer, MD

Chair

Brooklyn Action Corps

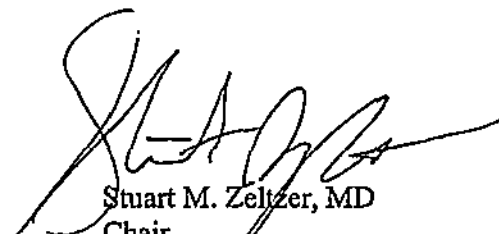
Cc: All parties of record

Appendix A – Area Map



CERTIFICATE OF SERVICE

I hereby certify that I have caused the foregoing *Comments of Brooklyn Action Corps* to be served electronically or by first-class mail, postage pre-paid, on all parties of record in this proceeding.



Stuart M. Zeltzer, MD
Chair
Brooklyn Action Corps

July 13, 2026