

BEFORE THE SURFACE TRANSPORTATION BOARD

Docket No. FD 36873

Union Pacific Corporation and Union Pacific Railroad Company, Control, Norfolk Southern
Corporation and Norfolk Southern Railway Company

**PRELIMINARY CONSULTATION COMMENTS ON THE SCOPE OF THE
ENVIRONMENTAL IMPACT STATEMENT**

Houston Super Neighborhood 63 (Second Ward)

September 21, 2026

Elizabeth Webster
Office of Environmental Analysis
Surface Transportation Board (Docket No. FD 36873)
395 E Street SW, Washington, DC 20423

Filed electronically under Environmental Comments, Docket No. FD 36873

To Ms. Webster:

We are Houston Super Neighborhood 63, Second Ward. We cover about 2.9 square miles just east of downtown and have roughly 10,500 residents. Four Union Pacific lines run through us or along our borders: the Galveston Subdivision, the Houston East Belt, the Houston West Belt, and the Navigation Yard Lead. Congress Yard sits near our western edge, and Tower 85 sits at our eastern edge.

Super Neighborhoods 64 and 88 are filing comments with your office today asking you to study the Houston terminal as the connected system it actually is. We join that request, and we adopt their filing. We are writing separately because of one fact that belongs on this record in our own name.

The most-reported blocked railroad crossing in the United States is in Second Ward.

Eastwood Street, U.S. DOT crossing 859522Y, drew 2,303 reports to the Federal Railroad Administration between January 1, 2021 and December 31, 2025. Three more of our crossings sit in the national top twelve. The track running under all four of them is outside your study area, and on Applicants' own September 9 numbers it will stay outside, because the transaction adds no trains to it at all.

That last sentence is the whole of our comment. The rest of this letter shows our work.

I. Four of the twelve most-reported blocked crossings in the country are in Second Ward

We ranked every crossing in the FRA Public Blocked Crossing Incident Reporter for calendar years 2021 through 2025, nationwide, with exact duplicate records removed. Four of the top twelve are ours.

National rank	DOT number	Street	Subdivision	Reports 2021–2025
1	859522Y	Eastwood Street	Galveston Sub	2,303
7	859523F	South Lockwood Drive	Galveston Sub	906
9	859524M	Dumble Street	Galveston Sub	684
12	859521S	Oakhurst Street	Galveston Sub	589

All four sit on the Galveston Subdivision, inside our boundary, within seven tenths of a mile of one another. Eastwood Street alone accounts for a third of every blocked crossing report filed in Second Ward over those five years. Its count rose from 49 in 2021 to 908 in 2025.

II. What Applicants filed on September 9 for the track under those crossings

The Galveston Subdivision through Second Ward runs from Tower 85, at Galveston Subdivision milepost 2.1, west to Congress Yard at Houston West Belt Subdivision milepost 233.5. In the Applicants' Master Data Table, that is segment 124022, 2.7 miles long. Segment 12402 feeds it from the southeast at Tower 85.

Here is what the September 9 tables say about the two of them.

Segment	Endpoints	GIS mi	Yr 5 TPD no txn	Txn TPD	Yr 5 TPD w/ txn	Carloads added	mGTM chg	Exceeds?
124022	Tower 85 to Congress Yard	2.7	9.09	0.00	9.09	+31,459	17.2%	NO
12402	Tower 30 to Tower 85	2.2	16.00	0.00	16.00	+40,633	13.1%	NO

Segment 124022 gains 31,459 carloads a year. It gains 0.00 trains per day. Segment 12402 gains 40,633 carloads a year and 0.00 trains per day.

More cars moving on the same number of trains means longer trains. How long a crossing stays blocked is a function of how long the train is. The Board's threshold test at 49 C.F.R. § 1105.7(e)(5) measures trains per day and gross ton miles. Houston sits in the Houston-Galveston-Brazoria ozone nonattainment area, so the test here is three more trains per day or a 50 percent increase in gross ton miles. Our segment moves 0.00 on the first and 17.2 percent on the second. It falls below both. It is marked NO.

The segment carrying the most-reported blocked crossing in the United States falls below every test the Board applies, and it falls below the train count test by the widest margin available, because the number does not move.

We are not arguing that the arithmetic is wrong. We are saying the arithmetic does not measure the thing that happens here.

The pattern holds across our whole footprint. Exhibit A lists the eleven segments that serve Second Ward. Eight of them gain no additional trains at all. Six of those eight still gain carloads, 169,860 a year between them. Every one of the eleven is marked NO.

III. One train of average length covers every crossing we have

Nine at-grade crossings sit on the Galveston Subdivision inside Second Ward. Eight are public. Here they are in milepost order, with the distance to the next one.

DOT number	Street	Milepost	Type	Feet to next crossing
859516V	Sampson Street	0.305	Public	343
859517C	York Street	0.370	Public	845
859518J	Milby Street	0.530	Public	370
859519R	Private (UP)	0.600	Private	1,003
859521S	Oakhurst Street	0.790	Public	739
859522Y	Eastwood Street	0.930	Public	1,162
859523F	South Lockwood Drive	1.150	Public	1,426
859524M	Dumble Street	1.420	Public	1,204
859527H	Altic Street	1.648	Public	—

Sampson Street to Altic Street is 1.343 miles. That is 7,091 feet, and all nine crossings fall inside it. The mean spacing is 886 feet. The widest gap anywhere in the run is 1,426 feet.

Union Pacific reported a system-average train length of 9,729 feet in the fourth quarter of 2025. That average train is 2,638 feet longer than our entire nine-crossing string.

Train length	Miles	Source	Crossings spanned at once
7,200 ft	1.36	TxDOT Houston Region Freight Study, long modern train	9 of 9
7,500 ft	1.42	GAO: about 25 percent of trains exceed this	9 of 9
9,729 ft	1.84	Union Pacific system average, Q4 2025	9 of 9
12,000 ft	2.27	GAO: railroads regularly run trains this long	9 of 9
16,000 ft	3.03	GAO: railroads run trains over this length	9 of 9

A train of Union Pacific’s own average length, standing still anywhere along this stretch, covers every crossing in our neighborhood at the same time. It does not have to be an unusual train. At 7,200 feet, the length the Texas Department of Transportation uses as its long-train benchmark for the Houston region, the answer is the same.

Our residents have been describing this to the FRA for five years without using the word segment. One report from July 13, 2025 states it better than we can:

“A freight train blocked many miles of grade crossings for more than five hours. An ambulance encountered the blockage at Eastwood, rerouted west to York, hit the same train again, then turned onto Sampson, ultimately heading in the direction it came.”

Three crossings. One train. The ambulance ended up pointed back the way it came. A segment-by-segment test cannot describe that, and a train-count threshold set at three trains per day will never capture the cause.

IV. What the federal record already shows on the track that would go unstudied

Forty-seven public and private crossings lie inside Second Ward or within 100 feet of our boundary. Thirty-nine of them are at grade, and twenty-nine of those thirty-nine are public. We drew the line at 100 feet, and we say so openly, because the Galveston Subdivision runs along the boundary we share with Greater Eastwood, and we would rather explain the rule than bury it. Between January 1, 2021 and December 31, 2025, the FRA received 6,937 reports at these forty-seven crossings, with exact duplicate records removed. Exhibit C lists every one. Our Galveston Subdivision crossings also fall inside the twenty-eight-crossing footprint filed by Super Neighborhoods 64 and 88, so the two records overlap and should not be added together.

Count	What the reports state
2,791	First responders were observed being unable to cross the tracks
3,186	Pedestrians were observed climbing on, over, or through the train cars
1,115	Blockage of two hours or longer, including 185 of six hours or longer
6,770	A stationary train rather than a moving one, which is 98 percent of them
56	Gates or lights activated with no train present at all
227	The words child, student or school in the narrative, 120 of which also flag pedestrians climbing
1,337	A single train standing across more than one crossing or intersection, out of the 2,307 reports that carry a narrative. See the note below this table.

By subdivision: Galveston 6,523, Houston East Belt 282, Houston West Belt 99, Navigation Yard Lead 33. The Galveston Subdivision carries 94 percent of our record and none of your study area.

The trend runs one way: 527 reports in 2021, 779 in 2022, 720 in 2023, 2,480 in 2024, and 2,431 in 2025. Across five years that is 659 reports for every thousand residents of this neighborhood.

None of our forty-seven crossings appears in the Master Data Table for Roadway and At-Grade Crossings transmitted September 9. That table lists thirteen Houston crossings. Eleven sit on the Houston Subdivision northeast of Loop 610, between Oates Road and Champion Paper Drive. The other two are Liberty Road and Kirkpatrick Boulevard at Settegast. The crossings where blockage is documented and the crossings you plan to scope are two separate sets with nothing in common.

These are citizen complaints and we will say plainly what they are. They measure how often something happens and also how willing people are to report it. They are not sensor data. We offer them as a reason to look, and we think 2,791 reported first-responder blockages in five years in one neighborhood of 10,500 people is a sufficient reason.

V. Applicants' two federal filings disagree about how many trains run here

The published U.S. DOT crossing inventory record, Form 71, reports 4 through trains per day at every Galveston Subdivision crossing in Second Ward. That is the current figure carried for

Sampson, York, Milby, Oakhurst, Eastwood, Lockwood, Dumble, Altic, and the private crossing at milepost 0.600.

Applicants' September 9 Master Data Table reports a baseline of 8.65 trains per day on segment 124022 and 15.22 on segment 12402, rising to 9.09 and 16.00 in Year 5 without the transaction. Those segments carry the same nine crossings.

We cannot reconcile those figures, and we are not accusing anyone of anything. The crossing inventory is a self-reported record that railroads update at their own pace, so the gap may be nothing more than a stale field. That is the point. The threshold test that decides whether our neighborhood gets studied applies to a train count, and the public-record count for our crossings is four. We ask the Board to put the current, verified count for each crossing in Exhibit C on this record, drawn from Applicants' own operating data rather than from the inventory, before the scope is set.

VI. Our schools, our fire station, and our emergency response

Seven school campuses sit inside Second Ward. Exhibit D lists them together with twelve more East End campuses just outside our boundary that sit on the same lines. Baylor College of Medicine Biotech Academy at Rusk, at 2805 Garrow Street, is eight hundredths of a mile from the Delano Street crossing on the Navigation Yard Lead. Tijerina Elementary, at 6501 Sherman Street, is one tenth of a mile from the Sherman crossing on the East Belt.

The 227 reports whose narratives use the words child, student or school describe school arrival and school dismissal:

"During school drop off, multiple crossing blocked at once. Observed children waiting to cross to get to school on foot and bike."

"It was the first day of school and my kids arrived late because this train decided to sit there for more than an hour before it moved."

"Nearby schools were letting out at this time and many buses were stuck with kids on board. This is ridiculous."

Houston Fire Department Station 17, at 2805 Navigation Boulevard, is inside Second Ward. It is our station. The Galveston Subdivision runs along our southern edge, and Station 17 sits north of it, about a mile from Eastwood Street. When a train stands on that line, the engine cannot reach the blocks along it, and it cannot reach Greater Eastwood on the other side of it. A resident filed this report on December 10, 2024:

"Parked train blocking HFD fire engine 17 deployed to emergency with lights & sirens on at 11:04pm. Diverting along McKinney to find way around for emergency response"

That is our own engine, blocked in our own neighborhood, on its way to a call. Station 18 at 619 Telephone Road and Station 20 at 6902 Navigation Boulevard are the next closest, and both are across a line from part of what they serve. Two more reports from the same record:

“An ambulance had to turn around and find another route. Union Pacific claims they were going to break the trains here if they stopped for longer than 30 mins. That did NOT happen here.”

“Arms have been down for over 12 hours, blocking first responders during a disaster declaration. Houston experienced a severe storm.”

The Western Chicagoland Merger Oversight Alliance made a point in its September 18 filing at EI-34335 that we adopt here. In the CPKC proceeding the Board accepted a voluntary measure resting on a ten-minute blocked-crossing convention, VM-Grade Crossing-02. That ten-minute figure came from the General Code of Operating Rules Committee, a railroad-only body, without an outside study. NFPA 1750, the national standard for deploying fire suppression and emergency medical services, sets a travel-time benchmark of 240 seconds, 90 percent of the time. Ten minutes is two and a half times that. A ten-minute reporting floor would leave most of what happens on our streets out of the record.

The Joint East End Super Neighborhood Coalition asked the Board, in filing 310171, for air quality monitors on all rail lines within one mile of schools. We are a constituent member of that coalition and we renew the request here. Exhibit D is our part of that list.

VII. The Board has widened a Houston study area before, after hearing from residents

In Docket No. FD 36500, your office modeled train noise for a Houston-area segment that fell below the analysis threshold. Footnote 3 at page 3.6-19 of the Final Environmental Impact Statement records that although the projected increase fell below the noise analysis threshold, the office modeled it in response to public comments on the Draft. The Board’s March 15, 2023 decision confirms at page 156 that the expanded analysis covered noise and vibration, grade crossing safety, grade crossing delay and emergency response, and freight rail safety.

In the same proceeding, your office turned down a broader request, explaining at page S-289 that it found no basis to depart from the regulatory thresholds and that commenters had identified none. That sentence is why this letter is as long as it is. We are here to identify the basis.

The authority already exists. Section 1105.6(d) lets the Board reclassify or modify its environmental reporting requirements for individual proceedings. Section 1105.7(f) lets the Board require Applicants to submit additional information about environmental effects. In FD 36500 your office widened the study area without citing either one, because commenters gave it a reason to.

VIII. What we ask you to study

1. **Bring the Galveston Subdivision into the study area.** Analyze segments 124022 and 12402, and the Galveston Subdivision between Congress Yard and Tower 85, regardless of whether either segment meets the numerical thresholds at 49 C.F.R. § 1105.7(e)(5). This is 4.9 miles of track carrying the most-reported blocked crossing in the country and three more of the national top twelve.
2. **Analyze train length, not just train count.** Where a segment shows a carload or gross ton mile increase with no train-per-day increase, require projected train lengths and analyze crossing blockage duration on that basis. Segments 124022 and 12402 are the clearest cases anywhere in this docket: 72,092 additional carloads a year between them and 0.00 additional trains. Exhibit A lists four more segments with the same signature.
3. **Study the nine-crossing span as one exposure unit.** The nine at-grade crossings on the Galveston Subdivision in Second Ward lie within 7,091 feet of one another. Analyze what a train of Union Pacific's reported average length does to all nine at once, rather than analyzing any one of them alone. A study that treats them as nine independent questions will produce nine answers and miss the effect entirely.
4. **Extend the crossing analysis to the crossings where blockage is documented.** Bring the twenty-nine public at-grade crossings in Exhibit C into the grade crossing delay, emergency response, and safety analysis. The current list of thirteen Houston crossings does not include one of them.
5. **Reconcile the train counts.** Union Pacific's Form 71 reports 4 through trains per day at our Galveston Subdivision crossings. The September 9 Master Data Table reports 9.09 and 16.00 trains per day on the segments that carry them. Please require a reconciliation and state which figure governs the scope of review.
6. **Require the operating detail behind the carload increase.** Require Applicants to state how the additional carloads on segments 124022, 12402, 124662, 124663, 123969 and 12231 arrive and leave: in how many trains per day, at what lengths, and in which hours. Without that, nobody can test whether the segments fall below the thresholds.
7. **Measure gate downtime, and reject a ten-minute floor.** Adopt gate downtime with entry and exit timestamps as the blocked-crossing metric, rather than a convention inherited from the railroads' own rulebook. Where signaling cannot measure it, require Applicants to fund the sensors and retain and publicly file the data. We support the metrics proposed by the Western Chicagoland Merger Oversight Alliance at EI-34335 and ask that they apply in Houston.
8. **Study a shorter-train scenario and quantify the relief.** Analyze an alternative in which train length over the Houston terminal segments is held to the longest usable receiving and

departure track at the yard each train is entering, and require Applicants to state those usable track lengths on the record. Any length under 7,091 feet is the difference between one train blocking nine of our crossings and one train blocking some of them. We raise this as a reasonable alternative for the Environmental Impact Statement to analyze under NEPA, not as an operating condition for the Board to impose.

- 9. Scope the Houston terminal as a single system.** We join Super Neighborhoods 64 and 88 in asking you to analyze the Houston terminal segments together with the Settegast and Englewood facilities as one connected terminal, including the junction and control point interactions they describe. Tower 85, at our eastern edge, is where four of those segments meet.
- 10. Quantify diesel particulate matter separately and model near-source concentrations.** Appendix K lists nine mobile source air toxics and the emissions tables report eight. Quantify diesel particulate matter separately along the Galveston Subdivision, and model concentrations at receptors within 1,000 feet of it using AERMOD or an equivalent. A regional emissions inventory says nothing about what a child at 2805 Garrow Street breathes.
- 11. Address public health and safety under 49 C.F.R. § 1105.7(e)(7)(i).** That provision directs the environmental documentation to describe effects on public health and safety. Please do so for the population within a half mile of the Galveston Subdivision between Congress Yard and Tower 85, and for the campuses and emergency response facilities in Exhibit D by name.
- 12. Publish a change log.** Publish a reconciliation of the Houston figures across the original application, the amended application of April 30, 2026, the July 27, 2026 supplement, and the September 4, 2026 errata, showing what changed in each version and why. The September 9 tables state that they supersede prior submittals. The record should show what was superseded.

IX. Process

Please confirm whether you will issue a Draft Environmental Impact Statement. On August 28, 2026, counsel in this docket wrote to the Director of your office stating that in this proceeding there will be no Draft EIS, and that the only opportunity for submitting substantive comments will be in response to the Notice of Intent. That correspondence is on this record at EI-34305. If that understanding is correct, this comment period and the scoping period that follows are the only public environmental comment opportunities in a proceeding of this size. We would like that stated publicly.

The Board has announced at least one public meeting in Houston. Please host two to three, so we can accommodate the various neighborhoods affected and our residents' work schedules. At least

one should be in the evening, with Spanish-language interpretation and Spanish materials. Second Ward will help with outreach, turnout, and interpreters, and we can offer venues inside our boundary.

Please add the missing Houston entities to the distribution list. Port Houston, the Metropolitan Transit Authority of Harris County, the Houston-Galveston Area Council, the Texas Historical Commission, and the Houston City Council offices whose districts hold these lines are all absent from the preliminary consultation distribution list. We ask that they be added, and that Super Neighborhood 63 be added for the rest of the environmental review, along with Super Neighborhoods 61, 64, 65, 82 and 88. Together we are the East End Super Neighborhoods.

X. Conclusion

The most-reported blocked railroad crossing in the United States sits on a 2.7-mile segment that Applicants' own tables say will gain 31,459 carloads a year and not one additional train. Nine crossings lie within 7,091 feet of one another on that line, and Union Pacific's own average train is longer than the whole string. The federal record holds 6,937 blocked crossing reports at our crossings over five years, 2,791 of them describing first responders who could not get through.

We ask you to study the track we live on. We appreciate the chance to comment, and we would welcome the opportunity to meet with your office, host a site visit, and stand with you at Eastwood Street.

Respectfully submitted,

Ricky Cardenas

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Exhibit A. Rail line segments serving Second Ward in the September 9, 2026 Master Data Table

Source: UP-NS Response to OEA for Second Errata Filing, Master Data Table, Rail Line Segments, transmitted September 9, 2026 (EI-34309). Endpoints are reproduced from the segment names in that table. TPD is trains per day including locals. Carloads added is the transaction growth column of the annual carloads table. None of the eleven is marked as exceeding the thresholds at 49 C.F.R. § 1105.7(e)(5).

Segment	Endpoints	GIS mi	Yr 5 TPD no txn	Txn TPD	Yr 5 TPD w/ txn	Carloads added	mGTM chg
124022	Tower 85 to Congress Yard	2.7	9.09	0.00	9.09	+31,459	17.2%
12402	Tower 30 to Tower 85	2.2	16.00	0.00	16.00	+40,633	13.1%
124662	Tower 26 to Congress Yard	1.4	27.79	0.00	27.79	+49,438	12.6%
124663	Congress Yard to South Yard	1.9	16.36	0.00	16.36	+17,982	8.8%
123969	Dallerup to Booth Yard	2.4	8.93	0.00	8.93	+29,207	34.1%
12231	Glass Yard to Dallerup	0.1	2.25	0.00	2.25	+1,141	9.1%
13027	Tower 30 to TNO Junction	2.9	2.47	0.00	2.47	0	0.0%
124021	Harrisburg Junction to Tower 30	0.4	6.29	0.00	6.29	0	0.0%
13014	Tower 86 to Dallerup	1.1	28.99	1.00	29.99	+48,214	10.5%
12400	Dallerup to Tower 85	0.7	17.01	1.00	18.01	+17,866	5.0%
123964	Double Track Junction to Tower 85	2.0	14.08	1.00	15.08	+8,692	3.9%

Eight of the eleven gain no additional trains at all. Six of those eight still gain carloads, 169,860 a year between them. Segment 124022 carries the nine crossings listed in Part III. Four segments meet at Tower 85, at our eastern edge, and together they add 98,650 carloads a year on a combined increase of 2.00 trains per day.

Applicants' Houston terminal contains more segments than have so far been tabled in this docket. Super Neighborhoods 64 and 88 table twenty-four in their filing of the same date. Seven of the eleven above are not among those twenty-four. We table them here so the record carries both sets.

Exhibit B. The thirteen Houston at-grade crossings included in the analysis

Source: UP-NS Response to OEA for Second Errata Filing, Master Data Table, Roadway and At-Grade Crossings, transmitted September 9, 2026. Not one of the forty-seven crossings in Exhibit C appears in this table. Eleven of the thirteen sit on the Houston Subdivision northeast of Loop 610, and the other two sit at Settegast. The nearest of the thirteen is 4.7 miles from Eastwood Street and the farthest is about sixteen.

DOT number	Street	Subdivision	Milepost	Segment or yard
287981M	Liberty Road	Houston East Belt Sub	4.68	11249
411764D	Liberty Road	Houston Sub	356.74	11249
758293C	Liberty Road	Houston Sub	355.32	11249
745074B	Oates Road	Houston Sub	353.60	11249
287974C	Kirkpatrick Boulevard	Houston East Belt Sub	4.05	Settegast Yard
762907S	John Ralston Road	Houston Sub	352.69	10526

DOT number	Street	Subdivision	Milepost	Segment or yard
762905D	Heather Row Lane	Houston Sub	352.18	10526
762904W	CE King Parkway	Houston Sub	351.63	10526
762901B	Van Hut Lane	Houston Sub	350.75	10526
762897N	Pineland Road	Houston Sub	349.12	10526
762895A	Park Road 138	Houston Sub	348.15	10526
762892E	Sheldon Road	Houston Sub	346.04	10526
762889W	Champion Paper Drive	Houston Sub	344.98	10526

Exhibit C. Crossings in and on the boundary of Super Neighborhood 63, and the federal blocked crossing record

Sources: crossing identity, subdivision, milepost and traffic count from the FRA Crossing Inventory (U.S. DOT Form 71), current record. Blocked crossing reports from the FRA Public Blocked Crossing Incident Reporter, calendar years 2021 through 2025, with exact duplicate records removed. Location determined by point-in-polygon against the City of Houston Super Neighborhood boundary. Crossings outside the polygon are shown with their distance to the boundary, and the cutoff used here is 100 feet. AADT is the FRA-recorded annual average daily traffic count with its count year. Eight of the forty-seven are grade separated in the inventory record and are listed for completeness; all eight carry zero reports. Not one of these crossings appears in the Master Data Table at Exhibit B.

DOT number	Street	Subdivision	MP	Location	AADT (year)	Reports
859522Y	Eastwood Street	Galveston Sub	0.93	in SN 63	1,826 (2021)	2,303
859523F	South Lockwood Drive	Galveston Sub	1.15	in SN 63	8,661 (2022)	906
859524M	Dumble Street	Galveston Sub	1.42	in SN 63	3,166 (2021)	684
859521S	Oakhurst Street	Galveston Sub	0.79	in SN 63	235 (2022)	589
859518J	Milby Street	Galveston Sub	0.53	in SN 63	3,184 (2021)	565
859516V	Sampson Street	Galveston Sub	0.31	in SN 63	2,935 (2021)	395
859527H	Altie Street	Galveston Sub	1.65	in SN 63	1,045 (2021)	394
859517C	York Street	Galveston Sub	0.37	in SN 63	2,561 (2021)	374
859519R	Private (UP)	Galveston Sub	0.60	in SN 63	1 (1985)	313
288024L	Canal Street	Houston East Belt Sub	8.94	in SN 63	7,960 (2019)	103
288034S	Harrisburg Boulevard	Houston East Belt Sub	9.25	boundary, 23 ft	7,613 (2019)	80
288129A	Commerce Street	Houston West Belt Sub	233.50	in SN 63	6,714 (2024)	61
288033K	Sherman Street	Houston East Belt Sub	9.09	in SN 63	268 (2001)	58
288127L	Runnels Street	Houston West Belt Sub	233.27	in SN 63	3,346 (2024)	38
288011K	Navigation Blvd eastbound	Houston East Belt Sub	8.65	in SN 63	10,534 (2019)	14
920030G	Navigation Blvd westbound	Houston East Belt Sub	8.63	boundary, 6 ft	33 (2016)	11
288014F	McFarland Street	Houston East Belt Sub	8.56	in SN 63	1,629 (2019)	11
758268U	North York Street	Navigation Yard Lead	1.95	in SN 63	7,981 (2011)	8
758272J	Canal Street	Navigation Yard Lead	2.59	in SN 63	4,070 (2013)	3
758271C	Navigation Boulevard	Navigation Yard Lead	2.46	in SN 63	616 (2018)	3
288287A	Paige Street	Navigation Yard Lead	2.90	in SN 63	207 (2015)	3
288020J	Private (UP)	Houston East Belt Sub	8.58	in SN 63	300 (1976)	3
288288G	Palmer Street	Navigation Yard Lead	2.75	in SN 63	268 (2001)	2
288286T	Delano Street	Navigation Yard Lead	2.95	in SN 63	880 (2013)	2
758266F	Drennan Street	Navigation Yard Lead	1.77	in SN 63	610 (2016)	2
288122C	St Charles Street (private)	Navigation Yard Lead	3.11	in SN 63	—	2
758263K	Private (UP)	Navigation Yard Lead	2.33	in SN 63	—	2

DOT number	Street	Subdivision	MP	Location	AADT (year)	Reports
758264S	Private (UP)	Navigation Yard Lead	3.06	in SN 63	—	2
288021R	Private (UP)	Houston East Belt Sub	9.38	in SN 63	1 (1970)	2
758270V	Engelke Street	Navigation Yard Lead	2.44	in SN 63	1,500 (1988)	1
755679P	North Ennis Street	Navigation Yard Lead	2.81	in SN 63	664 (1984)	1
288285L	Nagle Street	Navigation Yard Lead	3.00	in SN 63	250 (2013)	1
288284E	North Live Oak Street	Navigation Yard Lead	3.04	in SN 63	268 (2001)	1
288141G	Harrisburg Boulevard	Houston West Belt Sub	233.83	in SN 63	9,850 (2006)	0
288249R	Navigation Boulevard	Houston West Belt Sub	233.49	in SN 63	6,939 (2022)	0
288019P	Navigation Boulevard	Houston East Belt Sub	8.64	in SN 63	8,933 (2024)	0
288026A	Esperson Street	Houston East Belt Sub	9.11	in SN 63	278 (2019)	0
288027G	Esperson Street	Houston East Belt Sub	9.07	in SN 63	100 (1983)	0
975570F	Pedestrian, Buffalo Bayou	Houston West Belt Sub	233.14	in SN 63	—	0
440828R	Harrisburg Boulevard	Houston East Belt Sub	9.25	boundary, 18 ft	—	0
288012S	Private (UP)	Houston East Belt Sub	8.38	in SN 63	140 (1992)	0
288013Y	Private (UP)	Houston East Belt Sub	8.47	in SN 63	460 (1992)	0
288015M	Private (UP)	Houston East Belt Sub	8.84	in SN 63	690 (1992)	0
288018H	Private (UP)	Houston East Belt Sub	9.16	in SN 63	1 (1970)	0
440705E	Private (UP)	Houston East Belt Sub	9.52	in SN 63	—	0
288022X	Pedestrian, private	Houston East Belt Sub	8.90	in SN 63	—	0
980268B	Private pedestrian tunnel	Houston East Belt Sub	9.00	in SN 63	—	0

Forty-seven crossings, 2021 through 2025: 6,937 reports. First responders unable to cross: 2,791. Pedestrians climbing on, over or through train cars: 3,186. Blockages of two hours or more: 1,115, of which 185 ran six hours or more. Stationary train: 6,770. Gates activated with no train present: 56. Narratives using the words child, student or school: 227, of which 120 also flag pedestrians climbing.

Multi-crossing count, stated two ways. 1,337 of the 2,307 reports carrying a written narrative describe a single train standing across more than one crossing or intersection at the same time. A report was counted if its narrative contains any of: multiple crossing, many crossing, multiple intersection, many intersection, many grade crossing, or miles of grade crossing. We give the composition of that figure here rather than leave it to be found. 884 of the 1,337 are one identical sentence, which is phrasing that a widely used reporting template supplies, and 966 of the 1,337 turn on the words many intersections rather than on the word crossing. A narrower count, limited to narratives using the word crossing in the plural, is 45. We regard 1,337 as the evidence that one train routinely stands across several of our streets at once, and 45 as the floor. The companion filing by Super Neighborhoods 64 and 88 uses the narrower method and reports 101 for its own twenty-eight-crossing footprint.

Exhibit D. School campuses and emergency response facilities

Sources: school locations from the National Center for Education Statistics public school location file, current release. Fire station locations from the City of Houston published fire station layer. Super Neighborhood determined by point-in-polygon. Distance is straight-line distance to the nearest public crossing in Exhibit C. The second table lists every campus outside our boundary lying within 0.65 of a mile of one of those crossings.

Campuses inside Super Neighborhood 63

School campus	Address	Miles	Nearest public crossing
Baylor College of Medicine Biotech Academy at Rusk	2805 Garrow St	0.08	Delano St (Navigation Yard Lead)
Burnet Elementary	5403 Canal St	0.30	Esperson St (East Belt)
Ripley House Charter School	4410 Navigation Blvd	0.32	Drennan St (Navigation Yard Lead)
Ripley House Middle Campus	4414 Navigation Blvd	0.32	Drennan St (Navigation Yard Lead)
East Early College High School	220 N Milby St	0.34	Navigation Blvd (Navigation Yard Lead)
Middle College High School at HCC Fraga	301 N Drennan St	0.36	Drennan St (Navigation Yard Lead)
Laurenzo Early Childhood Center	205 N Delmar St	0.41	Esperson St (East Belt)

Other East End campuses on the same lines, just outside our boundary

School campus	Address	Miles	Nearest public crossing
Tijerina Elementary	6501 Sherman St	0.11	Sherman St (East Belt)
Lantrip Elementary	100 Telephone Rd	0.24	Eastwood St (Galveston)
Yolanda Black Navarro Middle	5100 Polk St	0.39	Altic St (Galveston)
Eastwood Academy	1315 Dumble St	0.40	Dumble St (Galveston)
Bruce Elementary	510 Jensen Dr	0.43	Buffalo Bayou pedestrian (West Belt)
Cage Elementary	4528 Leeland St	0.56	S Lockwood Dr (Galveston)
Project Chrysalis Middle	4528 Leeland St	0.56	S Lockwood Dr (Galveston)
Edison Middle School	6901 Avenue I	0.56	Navigation Blvd (East Belt)
School for Accelerated Learning	1310 Prairie St	0.60	Navigation Blvd (West Belt)
High School for Law and Justice	3503 Coyle St	0.60	Sampson St (Galveston)
Harris County Juvenile Detention Center	1200 Congress St	0.61	Navigation Blvd (West Belt)
Community Services SEC	1102 Telephone Rd	0.62	Dumble St (Galveston)

Emergency response facilities

Facility	Address	Miles	Position relative to the line
HFD Station 17	2805 Navigation Blvd	0.22	Inside SN 63, north of the Galveston Sub
HFD Station 20	6902 Navigation Blvd	0.45	North of the East Belt
HFD Station 18	619 Telephone Rd	0.49	South of the Galveston Sub
HFD Station 19	1811 Gregg St	1.22	North of the West Belt
HFD Station 9	702 Hogan St	1.29	North of the West Belt

Certificate of Service

I hereby certify that on this **September 21, 2026**, the foregoing document was served to all parties of record to this proceeding.

Ricky Cardenas