



September 21, 2026

Danielle Gosselin, Director
Office of Environmental Analysis
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Re: Docket No. FD 36873, Union Pacific Corporation and Union Pacific Railroad Company, Control, Norfolk Southern Corporation and Norfolk Southern Railway Company. Comments on the Scope of the Environmental Impact Statement and Request for Cooperating Agency Status.

To Director Gosselin:

Gulf Coast Rail District submits these comments on the scope of the Environmental Impact Statement for the proposed control transaction. The Gulf Coast Rail District (GCRD) is a political subdivision of the State of Texas created to enhance the economic benefits of rail and passenger transport while improving regional quality of life. Harris County, the City of Houston, and Fort Bend County created the Gulf Coast Rail District under authority granted by the State of Texas in Section 171 of the Transportation Code. The Port of Houston was instrumental in convening key stakeholders throughout the region to formalize a vision of a rail district, which resulted in the City of Houston, Harris County, and Fort Bend County creating the Gulf Coast Rail District.

The District encompasses Harris, Fort Bend, Galveston, Montgomery, and Waller Counties and is charged with improving rail crossing safety, mobility, and access.

Through the Houston Area Rail Transformation (THE HART) program, the District maintains regional data on crossing conditions, safety, community, and first responder impacts. The District requests that it be added to the consultation distribution list.

1. Cooperating Agency Status

The District respectfully requests designation as a cooperating agency for the Environmental Impact Statement. The District has both jurisdiction by law and special expertise in rail crossing safety and improvements within the Houston region.

GCRD's regional crossing data, developed with H-GAC and Texas A&M, along with data gathered from our work with first responders, and citizen accounts can provide relevant information during development of the environmental analysis rather than after the draft is completed.



2. Regional Data and Technical Resources

- The Houston Area Rail Transformation (THE HART) Safety Action Plan.
- The Regional Crossing Catalog being developed with H-GAC and Texas A&M
- First responder critical-crossing and emergency corridor information.
- Federal Railroad Blocked Crossing Portal
- Crossing occupancy and sensor data to measure actual blockage duration.
- Programmed and planned crossing improvement projects.
- Regional demographic and geographic data.

3. Expand Study Area and Consultation List

The applicants' analysis covers 68 crossings and largely stops at Tower 87, before reaching Houston's urban core. FRA data shows 25,196 blocked-crossing reports at Union Pacific crossings in the nine-county Houston region from January 2021 through June 2026. Only 371 (1.5%) occurred within the applicants' review area, while none of the region's 20 most-reported crossings is included. All 20 are in Houston's East End and Fifth Ward and are on designated rail corridors that cross junctions or feed into yards that are listed as part of the merger EIS.

Texas data for January 2023–December 2025 further shows that of 14,541 reports at 590 crossings, 4,836 involved blockages lasting one hour or longer. Thirty crossings accounted for 3,798 (78.5%) of those hour-plus reports. Eastwood Street (Crossing ID 859522Y) led with 476 hour-plus reports out of 2,149 total reports. Lockwood Street, Leeland Street, Cullen Boulevard, and Milby Street followed, and 27 of the 30 crossings were Union Pacific crossings in Houston.

The District requests that the study area include all crossings within the District, including the corridors and Settegast and Englewood yard complexes west of Tower 87. The consultation list should also include the City of Houston, Fort Bend, Galveston, Montgomery, Waller, and Chambers Counties, and the Gulf Coast Rail District.

4. Analyze Impacts by Corridor

Blocked-crossing impacts often occur across multiple connected crossings as trains stop and back up along a corridor. The EIS should therefore analyze blockage, noise, emissions, and emergency access at the corridor level, in addition to individual crossings, so that mitigation can be evaluated as a coordinated program. Recurring crossing delay consumes time, fuel, and delivery reliability. Vehicle queues concentrate emissions and noise near homes, schools, parks, and businesses. The effects can compound in communities already divided by multiple freight corridors, and they can reduce reliable access to jobs, clinics, grocery stores, and public facilities.



5. Account for the Shared Houston Terminal Complex

The Houston Terminal complex involves Union Pacific, BNSF Railway, CPKC, and Port Terminal Railroad Association operations over shared infrastructure and control points. The EIS should evaluate the terminal as an integrated system and account for how changes in Union Pacific traffic and train length affect other carriers and crossing occupancy.

6. Establish Measured Existing Conditions

The EIS should establish a reliable baseline using:

- Actual blocked-crossing frequency and duration.
- Locomotive horn activity and quiet-zone status.
- Nighttime noise levels.
- Emergency response delays.
- Pedestrian/trespassing exposure near schools.

FRA data cited by the District includes 11,634 reports involving pedestrians crossing through or around stopped trains and 10,985 reports involving blocked or delayed first responders.

7. Account for Public Investments

The analysis should identify existing and planned public investments, including the West Belt Improvement Project, East End and Galveston Subdivision quiet zones, grade-separation projects, and Safe Streets and Roads for All projects. The EIS should evaluate whether projected post-transaction conditions could affect their design requirements or benefits.

8. Analyze Below-Threshold Impacts and Reconcile Data

The District requests analysis of Houston segments that fall just below applicable thresholds because they include documented blockage impacts, significant baseline train activity, and dense residential areas.

The District also requests that applicants reconcile changing Houston projections, including Settegast truck traffic, Tower 87, Tower 26, corridor projections, and Englewood Yard volumes, and provide a change log explaining material revisions

9. Truck, Air Quality, and Cumulative Impacts

The EIS should address drayage truck traffic and routing at Settegast and Englewood, air-quality impacts, diesel particulate matter, cumulative impacts, and environmental justice considerations.



10. Process Requests

- At least one in-person Houston scoping meeting during evening or weekend hours.
- Scoping materials and live Spanish interpretation.
- A Draft EIS with at least a 45-day public comment period.
- Addition of the Gulf Coast Rail District, City of Houston, Fort Bend, Galveston, Montgomery, Waller, and Chambers Counties to the consultation list.

Conclusion

The District takes no position on whether the proposed transaction should be approved. The concern is that the environmental review accurately captures the Houston region's geographic scope, crossing impacts, shared terminal operations, and community effects.

The District has relevant regional data and expertise and is prepared to provide those resources.

Thank you for the opportunity to provide comment.

"/s/” Veronica Chapa Gorczynski

Veronica Chapa Gorczynski,
Chair
Gulf Coast Rail District



BLOCKED-CROSSING ANALYSIS

Crossings with 20 or more incidents lasting more than one hour

Texas public blocked-crossing reports · January 1, 2023 – December 30, 2025 · Source: reports (3).xlsx

Executive summary

Of 14,541 reports at 590 Texas crossings, 4,836 lasted one hour or longer. Thirty crossings had 20 or more of those hour-plus reports. Those 30 account for 3,798 hour-plus reports (78.5% of all hour-plus reports in the file).

- Eastwood Street in Houston (Crossing ID 859522Y) is first by a wide margin: 476 reports lasting 1 hour or more, out of 2,149 total reports at that crossing.
- The next four — Lockwood Street (324), Leeland Street (318), Cullen Boulevard (296), and Milby Street 288226J (280) — are also Union Pacific crossings in Houston.
- Twenty-seven of the 30 crossings are Union Pacific in Houston. The exceptions are Mossy Oaks Road in Spring (23), Tamina Road in The Woodlands (22), and Breen Road on BNSF in Houston (21).
- Among hour-plus reports at these 30 crossings, 2,259 mentioned first responders unable to cross and 2,478 mentioned pedestrians climbing on, over, or through train cars.
- The usual reported cause is a stationary train.

How the 30 crossings were selected

A crossing is included if its FRA Crossing ID has 20 or more report rows whose Duration is 1–2 hours, 2–6 hours, 6–12 hours, 12–24 hours, or more than one day. Reports of 0–15, 16–30, or 31–60 minutes do not count toward the threshold. Counts are public report rows, not de-duplicated blockage events. Several streets appear twice because they are different crossing IDs.



Figure 1. Hour-plus reports by crossing

Each bar is the number of reports lasting one hour or longer. The dashed line marks the 20-report threshold used to select the list. Orange bars are crossings with 200 or more hour-plus reports.

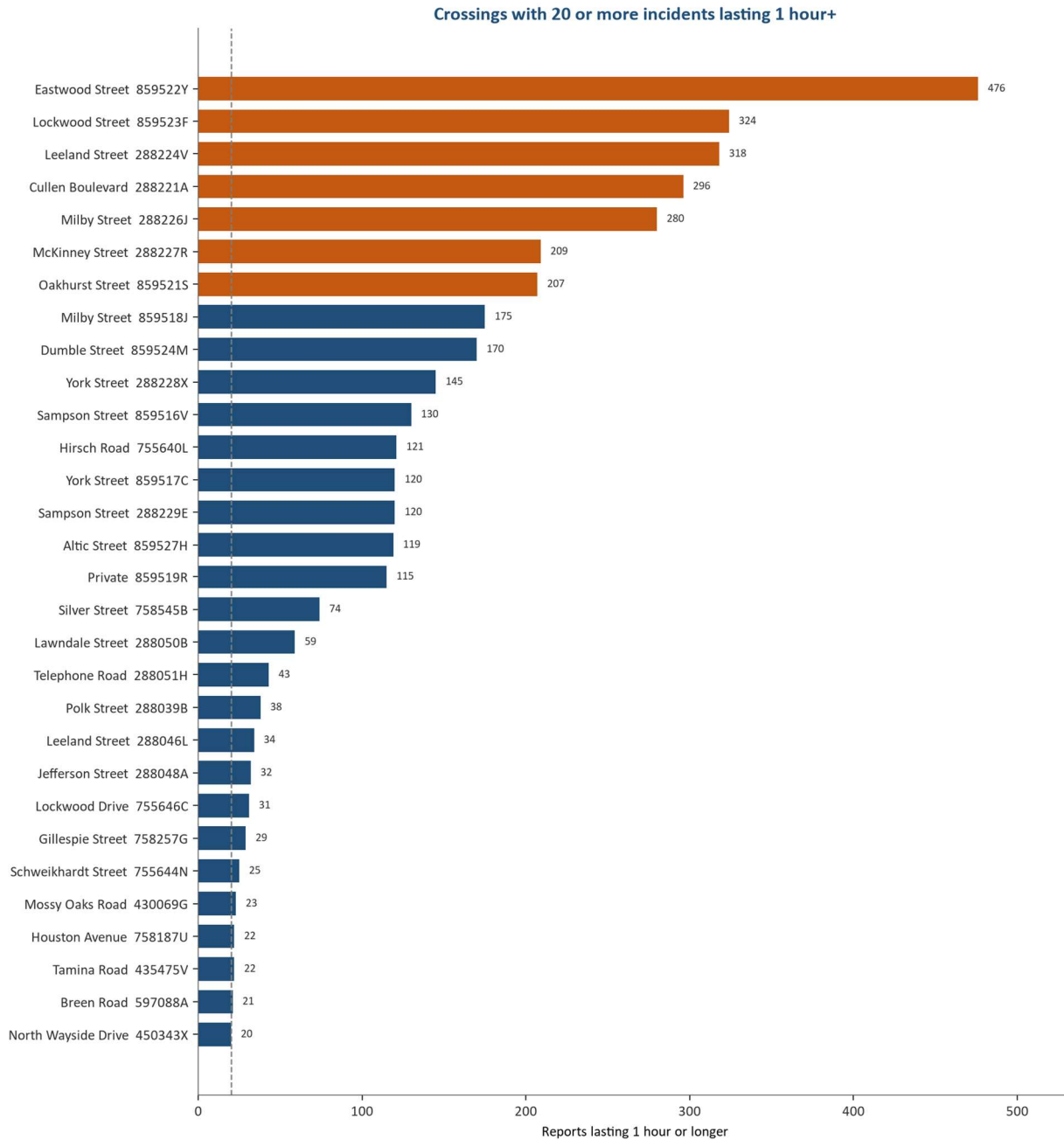


Figure 1. Reports lasting 1 hour or longer at each of the 30 crossings. Source: reports (3).xlsx.



Figure 2. Hour-plus reports versus shorter reports

The same 30 crossings also generate many reports under one hour. Eastwood Street has the most hour-plus reports and still has far more short reports than long ones. The orange segment is the metric used for the 20-report cutoff.

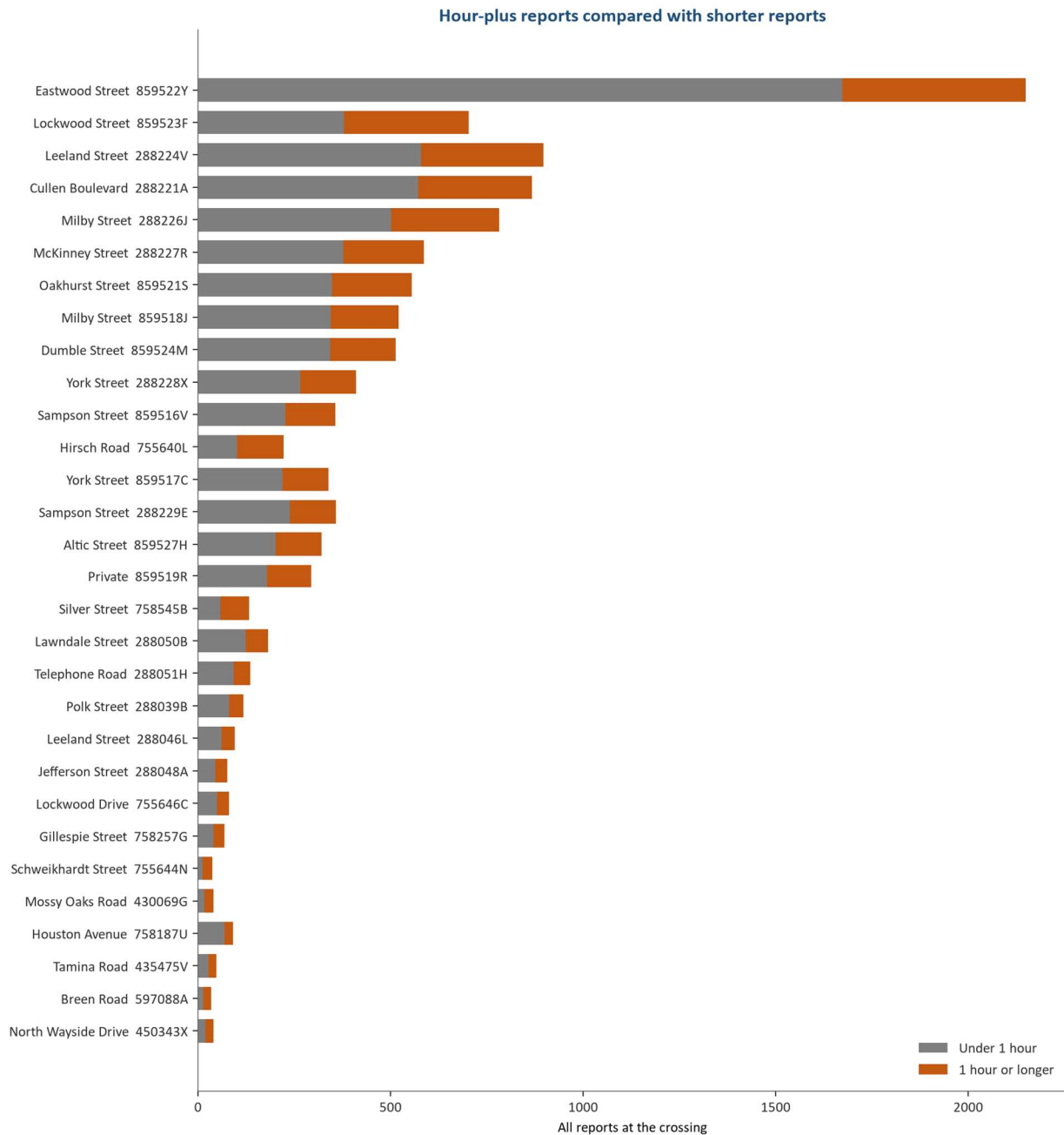


Figure 2. All reports at the 30 crossings, split into under 1 hour and 1 hour or longer.



Figure 3. Concentration of hour-plus reports

The 30 crossings are 5.1% of unique crossing IDs in the workbook (30 of 590) but hold 78.5% of reports that lasted an hour or more.

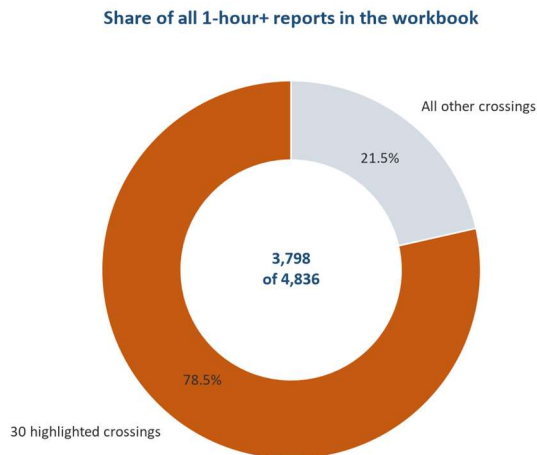


Figure 3. Share of all 4,836 hour-plus reports in the workbook.

Figure 4. Yearly pattern

Hour-plus reporting at these 30 crossings rose sharply from 2023 to 2024 and remained high in 2025 (through December 30). Other crossings follow the same shape at a much lower volume.

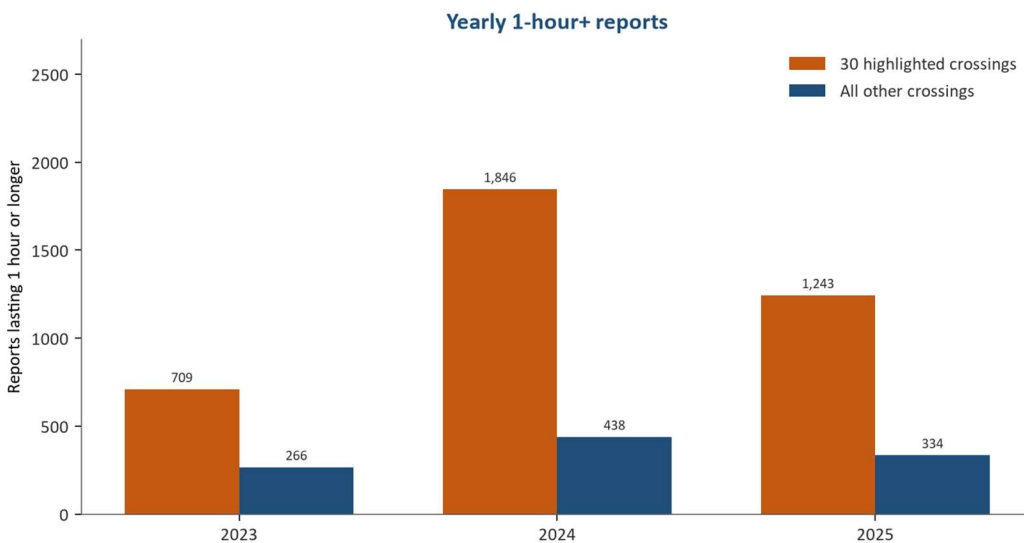


Figure 4. Hour-plus reports by year. 2025 is through December 30.



Figure 5. How long the hour-plus reports lasted

Most hour-plus reports at these crossings are in the 1–2 hour and 2–6 hour bins. A smaller set lasted 6 hours or more, including a handful reported as more than one day.

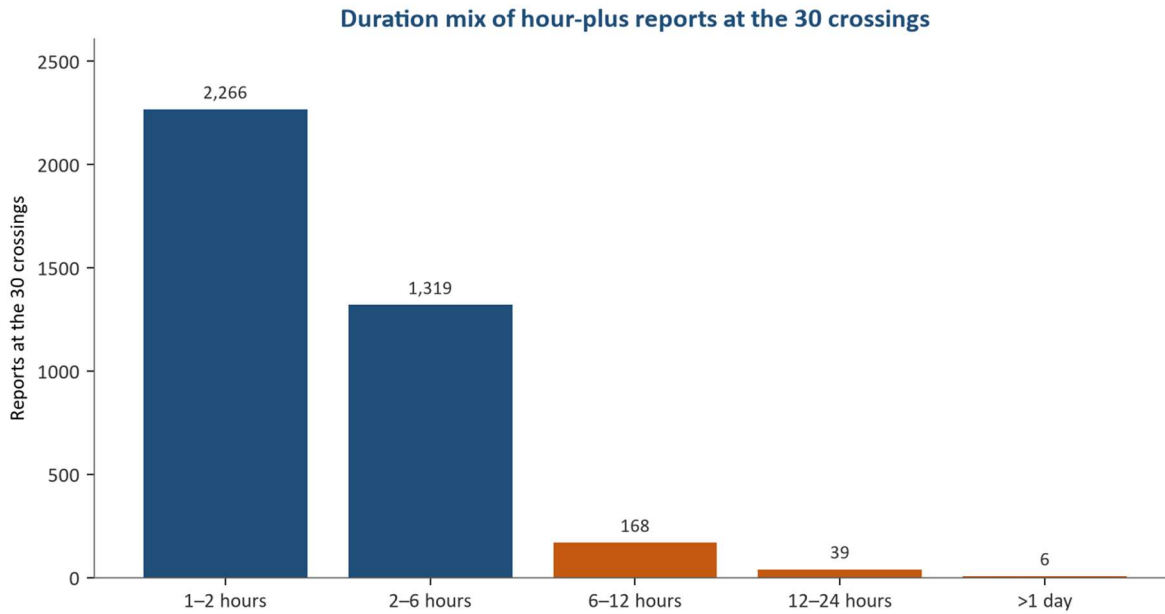


Figure 5. Duration mix of the hour-plus reports at the 30 crossings.



The 30 crossings

Ranked by hour-plus report count. The companion Excel workbook lists the same crossings with duration bins, yearly splits, and the underlying hour-plus incident rows.

#	Crossing ID	Street	City	RR	1 hour+	All reports
1	859522Y	Eastwood Street	Houston	UP	476	2,149
2	859523F	Lockwood Street	Houston	UP	324	703
3	288224V	Leeland Street	Houston	UP	318	897
4	288221A	Cullen Boulevard	Houston	UP	296	867
5	288226J	Milby Street	Houston	UP	280	782
6	288227R	McKinney Street	Houston	UP	209	587
7	859521S	Oakhurst Street	Houston	UP	207	555
8	859518J	Milby Street	Houston	UP	175	520
9	859524M	Dumble Street	Houston	UP	170	513
10	288228X	York Street	Houston	UP	145	410
11	859516V	Sampson Street	Houston	UP	130	356
12	755640L	Hirsch Road	Houston	UP	121	222
13	859517C	York Street	Houston	UP	120	339
14	288229E	Sampson Street	Houston	UP	120	358
15	859527H	Altic Street	Houston	UP	119	321
16	859519R	Private	Houston	UP	115	294
17	758545B	Silver Street	Houston	UP	74	132
18	288050B	Lawndale Street	Houston	UP	59	182
19	288051H	Telephone Road	Houston	UP	43	135
20	288039B	Polk Street	Houston	UP	38	118
21	288046L	Leeland Street	Houston	UP	34	95
22	288048A	Jefferson Street	Houston	UP	32	76
23	755646C	Lockwood Drive	Houston	UP	31	80
24	758257G	Gillespie Street	Houston	UP	29	69
25	755644N	Schweikhardt Street	Houston	UP	25	37
26	430069G	Mossy Oaks Road	Spring	UP	23	40
27	758187U	Houston Avenue	Houston	UP	22	91
28	435475V	Tamina Road	The Woodlands	UP	22	48
29	597088A	Breen Road	Houston	BNSF	21	34
30	450343X	North Wayside Drive	Houston	UP	20	40

Table 1. Thirty crossings with 20 or more reports lasting 1 hour or longer. Top five rows are shaded.

Location

Location	Crossings	1-hour+ reports
Houston, Harris County (Union Pacific)	27	3,732
Spring, Harris County (Union Pacific)	1	23
The Woodlands, Montgomery County (Union Pacific)	1	22
Houston, Harris County (BNSF)	1	21
Total	30	3,798



What this cutoff leaves out

Forty-one additional crossings have 20 or more reports of any duration but fewer than 20 lasting an hour. The closest misses on the hour-plus count are Fry Road in Cypress (18 hour-plus reports of 77 total), T.C. Jester Street (18 of 65), and Providence Street (17 of 63). Galveston 77th Street has substantial short-blockage volume but only a handful of hour-plus reports.

Notes

- Duration bins are those recorded in the source spreadsheet; “1–2 hours” is treated as one hour or longer.
- Immediate-impact counts in the Excel file include all reports at the crossing, not only hour-plus rows.
- Paired streets (Milby, Leeland, York, Sampson, Lockwood) are distinct FRA crossing IDs.
- A companion Excel workbook, HourPlus_Crossings_20plus.xlsx, contains the 30-crossing summary, chart data, and every hour-plus incident row for those crossings.

Prepared from reports (3).xlsx · 14,541 source rows · threshold: ≥ 20 reports of 1 hour+