

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 64 & 88 (Greater Eastwood, Lawndale, and Wayside)

September 20, 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

Dear Ms. Webster:

We are Super Neighborhood 64 & 88, Greater Eastwood, Lawndale, and Wayside. Together, we cover about twelve square kilometers of Houston's East End with roughly 23,000 residents. Four Union Pacific subdivisions run through us or along our borders: the East Belt, the West Belt, the Galveston, and the Harrisburg. Settegast, Englewood, Booth, and Basin yards sit at our edges.

We have one primary request: study the Houston terminal complex as the connected system it actually is, rather than as a list of segments that each pass or fail a numerical test on their own.

The reason lies in the data Applicants gave you on September 9. Their tables mark the Settegast intermodal facility as exceeding the Board's thresholds, with truck traffic climbing from 242 to 610 per day, up 140.2 percent. Every rail segment that feeds Settegast is marked as not exceeding thresholds. So is every other segment inside the Houston terminal. We looked at all twenty-four of them and found something worse than the gap we expected. The one Houston segment you plan to study will carry 30.10 trains a day in Year 5. Nine segments you do not plan to study will carry more than that. One of them will carry 63.76.

The following is the basis for widening the study area, drawn almost entirely from Applicants' own numbers and the federal blocked crossing record.

I. What Applicants filed on September 9, 2026

Union Pacific transmitted updated Master Data Tables to your office on September 9, in connection with the errata filed September 4. The transmittal says the tables cover all rail line segments in the updated workpapers for Electronic Appendix M, along with manifest yards, intermodal ramps, and automotive ramps, and that everything in the submittal supersedes prior submittals.

That same transmittal states the tests Applicants applied. Segments in attainment areas need a 100 percent increase in gross ton miles or 8 more trains per day. Segments in nonattainment areas need 50 percent or 3 more trains per day. Manifest yards need 100 percent more carloads, or 20 percent in nonattainment areas. Intermodal and automotive ramps need 10 percent more trucks or 50 more trucks a day. Houston sits in the Houston-Galveston-Brazoria ozone nonattainment area, so the three trains per day and 50 percent figures apply here.

Run those tests across Houston, and this is the result:

Facility or segment	What the September 9 tables show	Measure	Exceeds?
Settegast (B 372_UP)	242 to 610 trucks per day, up 356	+140.2%	YES
Westfield (A 213_UP), Spring	55 to 67 trucks per day, up 9	+15.5%	YES
Guffey (LF006_UP), Beaumont	82 to 109 carloads per day, up 23	+26.7%	YES
Segment 11249, Dawes to Tower 87	23.90 to 30.10 trains per day	+5.00 TPD	YES
Englewood Yard	Absent from the Manifest Yards table	none given	not listed
The other 23 Houston segments	See Exhibit A	+0.00 to +2.29 TPD	NO

These are the fourth set of Houston figures to reach your office, and they have moved every time. We are not accusing anyone of anything. We would simply like the scope set against the current numbers, with a record of what changed.

II. Less than one train a day separates studied from unstudied

Inside the Houston terminal, the distance between a segment that gets analyzed and a segment that does not is 0.71 trains per day.

Segment	Endpoints	Transaction TPD	Threshold	Result
11249	Dawes to Tower 87	+5.00	3.00	YES
12396	Lockwood to Tower 87	+2.29	3.00	NO
12449	Tower 87 to Houston (Settegast)	+2.06	3.00	NO
12403	Lockwood to Tower 26	+2.03	3.00	NO
124481	Tower 26 to Chaney Junction	+2.00	3.00	NO
12725	SO011 to SO003	+2.00	3.00	NO

Thresholds have to fall somewhere, and we accept that. What matters is where this one landed. Houston's entire urban core sits on the far side of it by margins of two-thirds of a train to one train a day, and the study area includes only the rural line northeast of the city.

III. The busiest track in Houston sits outside the study area

The Board's thresholds measure the increment the transaction adds. They do not measure what the segment ends up carrying. In the Houston terminal, those two things point in opposite directions. Ranked by trains per day in Year 5 with the transaction, the Applicants' table reads like this:

Segment	Endpoints	Year 5 TPD with txn	Miles	Analyzed?
12449	Tower 87 to Houston (Settegast)	63.76	0.3	NO
12466	Rabbit Jct to Tower 26	56.21	2.1	NO
12448	Belt Jct to Tower 26	52.84	1.8	NO
12396	Lockwood to Tower 87	46.43	3.2	NO

Segment	Endpoints	Year 5 TPD with txn	Miles	Analyzed?
12403	Lockwood to Tower 26	45.93	0.8	NO
13012	Basin Yard to North Yard	41.19	0.2	NO
11891	Tower 210 to Rabbit Jct	37.10	0.5	NO
12721	LS373 to HB008	34.67	1.4	NO
124481	Tower 26 to Chaney Junction	32.10	3.1	NO
11249	Dawes to Tower 87	30.10	3.8	YES

Segment 12449 runs three tenths of a mile from Tower 87 into the Settegast complex. It will carry more than twice the traffic of the segment you plan to study, and it is marked NO.

The same table shows a second pattern. On several Houston segments, the transaction adds weight without adding trains. Segment 12397, Tower 86 to Englewood, gains 31.9 percent in gross ton miles and 0.00 trains per day. Segment 124491, Houston to Settegast Junction, gains 23.7 percent on 1.06 more trains. When tonnage climbs faster than train count, trains get longer and heavier. Neither the three-train-per-day test nor the 50 percent gross ton mile test registers that, and train length determines how long a crossing stays blocked.

We are not the only community seeing this. The Western Chicagoland Merger Oversight Alliance filed on September 18 (EI-34335) reporting that its communities face a 9 percent rise in train frequency against a 36 percent rise in gross tons, and described the gap as evidence of a deliberate shift toward longer and heavier trains. Houston shows the same signature in a sharper form, because several of our segments show the tonnage increase with no train increase at all. Two ends of the combined system, one pattern, and a threshold test that catches it in neither place.

IV. The Houston terminal works as one system, and the Board's segment-by-segment test cannot see that

This is the part we most want you to hear, because numbers on a page tend to hide it.

The twenty-four segments in Exhibit A total 54.9 miles. The median segment is 1.8 miles long. Between them sit Tower 26, Tower 85, Tower 86, Tower 87, Tower 210, Rabbit Junction, Belt Junction, Gulf Coast Junction, Settegast Junction, Chaney Junction, Eureka Junction, TNO Junction, Double Track Junction, East Junction, and the throats of Settegast, Englewood, Booth, Basin, Congress, North and South yards. It is a lattice, not a line.

Now put a train on it. Union Pacific reported a system-average train length of 9,729 feet in the fourth quarter of 2025, or 1.84 miles. That average train, not an unusual one, is longer than thirteen of the twenty-four segments in the Houston terminal. The Government Accountability Office reports that about a quarter of trains exceed 7,500 feet, that some approached 14,000 feet by 2021, and that railroads run trains over 12,000 and over 16,000 feet.

Train length	Miles	Source	Longer than how many of our 24 segments
7,200 ft	1.36	TxDOT Houston Region Freight Study benchmark for a long modern train	8
7,500 ft	1.42	GAO: about 25 percent of trains exceed this	11

Train length	Miles	Source	Longer than how many of our 24 segments
9,729 ft	1.84	Union Pacific system average, Q4 2025	13
12,000 ft	2.27	GAO: railroads regularly run trains this long	15
16,000 ft	3.03	GAO: railroads run trains over this length	18

A train cannot occupy one of these segments without also occupying the control points at both ends, and those control points govern the segments next to it. A train too long for the yard it is entering stops short and waits for clearance, and while it waits it lies across whatever streets it happens to cover.

The Texas Department of Transportation reached this conclusion about our neighborhood years before this merger was announced. Its Houston Region Freight Study found that delay here 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.” A state agency has already documented that trains in this terminal have nowhere to wait except on top of our streets. The merger adds traffic to that condition.

So when your analysis finds that segment 11249 crosses a threshold and its neighbors do not, the conclusion that follows is not that the neighbors are unaffected. The conclusion that follows is that a segment-by-segment test cannot describe what happens here. Traffic added anywhere in this lattice propagates through all of it.

Our residents have been documenting exactly that to the FRA for five years, without using the word lattice. Of the reports filed at our crossings, 101 describe a single train blocking more than one crossing at the same time. A few, verbatim:

“Train stopped across many crossings, blocking pedestrians, vehicles and first responders”

“With the yard feet away, they decide to move the train and block three crossings right when we are dropping kids at school”

“Train stopped across multiple crossings in a dense urban area for 3 hours, including during peak traffic/commute times.”

“A train stopped, blocking many crossings. Air brake testing being performed for hours on a residential street, many blocks outside the yard.”

That last one is the yard clearance problem in a sentence. The work that belongs inside a yard is happening on our streets because the trains do not fit inside the yard.

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

Twenty-eight public and private at-grade crossings lie inside Super Neighborhoods 64 and 88 or on their boundaries. We drew the line at 100 feet from the boundary, and we want to explain why that matters rather than bury it. The Galveston Subdivision runs along the northern edge of Greater Eastwood. Its crossings fall a few feet on the Second Ward side of a line on a map, and each one is a street our residents use to get north. Eastwood Street, the crossing our Super Neighborhood is named for, sits 28 feet from the Super Neighborhood 64 boundary. Oakhurst sits 8 feet from it. Sampson, 10 feet.

Between January 1, 2021 and December 31, 2025, the FRA's public Blocked Crossing Incident Reporter received 13,528 reports at those twenty-eight crossings. Exhibit C lists every one.

6,389 state that first responders were observed unable to cross the tracks
6,730 state that pedestrians were observed climbing on, over, or through stopped train cars
2,279 report a blockage of two hours or longer, including 314 of six hours or longer
12,986 report a stationary train rather than a moving one, which is 96 percent of them
216 report gates or lights activated with no train present at all
528 name children, students, schools or school buses in the narrative, and 215 of those also flag pedestrians climbing through the cars

Eastwood Street alone accounts for 2,303 of those reports, which makes it the most-reported blocked crossing in the United States over that period. Reports rose from 49 in 2021 to 908 in 2025. Across all twenty-eight crossings, the trend runs in the same direction: 1,265 reports in 2021, 4,491 in 2024, 3,920 in 2025.

None of the twenty-eight appears in the Master Data Table for Roadway and At-Grade Crossings. That table lists thirteen Houston crossings. Twelve of them sit on the Houston Subdivision northeast of Loop 610, between Liberty Road and Champion Paper Drive. The thirteenth is Kirkpatrick Boulevard at Settegast. Exhibit B has the full list. The crossings where blockage is documented and the crossings you will 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 6,389 reported first-responder blockages in five years in two Super Neighborhoods is a sufficient reason.

VI. Our schools and our fire stations

Fourteen school campuses sit inside Super Neighborhood 64 and 88, all of them within three-quarters of a mile of these tracks. Three of them, KIPP Explore Academy, KIPP Intrepid Preparatory, and KIPP East End High School, share a building at 5402 Lawndale Street, roughly 500 feet from the East Belt crossing at Lawndale, with near-daily reports of children climbing through and under stopped trains during arrival and dismissal. Exhibit D lists all fourteen, plus fifteen more East End campuses just outside our boundaries that sit on the same lines.

The 528 reports that mention children are not abstract. They describe school arrival and school dismissal:

“Train blocked many crossings during a peak, rush hour travel period. People seen climbing through rail cars to get to school.”

“Huge safety issue as middle school has let out.”

“While the yard is super close, they purposely stop on the tracks, blocking kids from being able to get home from a long day of school.”

Houston Fire Department Station 18 at 619 Telephone Road and Station 23 at 8005 Lawndale Street are the two closest stations to this footprint. The East Belt Subdivision runs between them. Station 22, which carries the hazardous materials assignment, is at 7825 Harrisburg Boulevard, also on the east side of the line. When the East Belt is occupied, units responding into Greater Eastwood or Lawndale / Wayside from either station are on the wrong side of it.

The Western Chicagoland Alliance made a point in its September 18 filing that we want to adopt here. In the CPKC proceeding, the Board accepted a voluntary measure based 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 to us invisible, and we ask that it not be carried into this proceeding.

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. Exhibit D lists those schools. Twenty-nine campuses sit within roughly a mile of these lines, fourteen of them inside our two Super Neighborhoods, and the nearest three are about 500 feet from the East Belt. We renew that request here and ask that the monitoring analysis be scoped to reach them.

Segment 124492, Settegast Junction to Gulf Coast Junction, picks up 5,261 additional hazardous material carloads a year from the transaction on Applicants' own figures. It is marked NO.

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 on 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 on page S-289 that it found no basis to depart from the regulatory thresholds and that commenters had identified none. That sentence is the reason 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 are asking you to study

- 1. Scope the Houston terminal as a single system.** Analyze the segments in Exhibit A together with the Settegast and Englewood facilities as one connected terminal, regardless of whether any individual segment meets the numerical thresholds at 49 C.F.R. § 1105.7(e)(5). Include the junction and control point interactions described in Part IV. A study that treats these twenty-four segments as twenty-four independent questions will produce twenty-four answers and miss the effect entirely.
- 2. 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. Thirteen of our twenty-four segments are shorter than Union Pacific's own current system average train. Only six are shorter than 5,000 feet. Union Pacific operating personnel described Englewood's

usable build and departure length as roughly 5,000 feet during a Houston-Galveston Area Council freight committee tour of the yard, which is why we are asking you to put the real figure on the record rather than relying on our recollection of it. Somewhere between 5,000 feet and what runs today is a measurable amount of relief for this community. 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.

- 3. Require the operating detail that connects the facilities to the track.** Require Applicants to state how the 356 additional trucks a day at Settegast arrive and leave by rail: over which segments, in how many trains per day, at what lengths, and in which hours. Without that, nobody can test whether the connecting segments fall below the thresholds.
- 4. Analyze train length, not just train count.** Where a segment shows a gross ton-mile increase well above its train-per-day increase, require projected train lengths and analyze crossing blockage duration on that basis. Segments 12397 and 124491 are the clearest cases in our terminal.
- 5. Extend the crossing analysis to the whole terminal.** Bring every public at-grade crossing on the East Belt, the West Belt, the Galveston Subdivision, the Harrisburg Subdivision, and the Houston Subdivision between Tower 26 and Tower 87 into the grade crossing delay, emergency response, and safety analysis. The current list of thirteen Houston crossings does not include any of the crossings where blockage is documented.
- 6. Measure gate down time, 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. Require the data to be retained and publicly filed. We support the metrics proposed by the Western Chicagoland Merger Oversight Alliance at EI-34335 and ask that they apply in Houston.
- 7. Reconcile Englewood Yard.** Applicants' Electronic Appendix Q identifies Englewood as a manifest yard with a 20 percent increase in workload. Englewood is absent from the Manifest Yards table transmitted September 9. Please require a reconciliation and state which figure governs the scope of review.
- 8. 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 say they supersede prior submittals. The record should show what was superseded.
- 9. Quantify diesel particulate matter separately.** Appendix K lists nine mobile source air toxics. The emissions tables report eight. Diesel particulate matter appears on the list and then disappears. Quantify it separately at Settegast and Englewood and along the connecting segments.
- 10. Model near-source concentrations, not only regional totals.** Model concentrations at receptors within 1,000 feet of the terminal complex and the connecting segments using AERMOD or an equivalent. A regional emissions inventory says nothing about what a child at 5402 Lawndale 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 Houston terminal complex, and for the campuses and emergency response facilities in Exhibit D by name.

- 12. Address passenger rail on the same segments.** Applicants report current passenger operations on segments 11249, 12396, 12403, 12448, 12723, 124481, 124482, 124483, 12725 and 124492. The Environmental Impact Statement should say whether the projected freight increases affect existing and planned passenger service on them.

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 UPNS, there will be no Draft EIS, and the only opportunity for submitting substantive comments will be in response to the NOI,” and asking whether Applicants' voluntary mitigation measures would appear in the Notice of Intent. That correspondence is on this record at EI-34305, still unanswered as of September 8. 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, and if no Draft will be issued, we would like to know when and how affected communities may comment on proposed mitigation before the Environmental Impact Statement is final.

The STB has already announced at least one public meeting in Houston; please host two to three to accommodate the various neighborhoods affected and our residents' work schedules. At least one, in the evening, with Spanish-language interpretation and Spanish materials. Our Super Neighborhoods will help with outreach, turnout, and interpreters, and we will work with the Houston-area legislative delegation to identify a venue large enough and central enough to serve the East End. Please tell us what the Board needs from a site, and we will bring you options.

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 64 & 88 be added, for the rest of the environmental review, as well as Super Neighborhood 61, Super Neighborhood 63, and Super Neighborhood 65 & 82. We are the East End Super Neighborhoods.

X. Conclusion

Applicants' September 9 tables put a 140 percent increase in truck activity inside the study area and every foot of track that serves it outside. The same tables show the one Houston segment selected for study carrying less traffic than nine segments that were not selected. Thirteen of our twenty-four segments are shorter than Union Pacific's own average train.

We ask you to study the Houston terminal as one system, because that is how it is built and how it fails. We appreciate the chance to comment, and we would welcome the opportunity to meet with your office, host a site visit, and walk you across Eastwood Street.

Respectfully submitted,

Lindsay Williams

President, Super Neighborhood 64 (Greater Eastwood)

President, Super Neighborhood 88 (Lawndale / Wayside)

Houston, Texas

[email] | [phone]

Exhibit A. Houston terminal rail line segments 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). The table states that it supersedes previous submittals to the Office of Environmental Analysis for Information Requests 1 through 3. Endpoints are reproduced from the segment names in that table. TPD is trains per day including locals. The twenty-four segments total 54.9 miles, with a median length of 1.8 miles.

Seg.	Endpoints	GIS mi	Baseline TPD	Yr 5 no txn	Txn TPD	Yr 5 w/ txn	mGTM chg	Exceeds?
11249	Dawes to Tower 87	3.8	23.90	25.10	5.00	30.10	32.2%	YES
12449	Tower 87 to Houston (Settegast)	0.3	58.71	61.70	2.06	63.76	2.3%	NO
12466	Rabbit Jct to Tower 26	2.1	53.45	56.18	0.03	56.21	6.4%	NO
12448	Belt Junc to Tower 26	1.8	50.29	52.83	0.01	52.84	2.0%	NO
12396	Lockwood to Tower 87	3.2	42.02	44.14	2.29	46.43	11.7%	NO
12403	Lockwood to Tower 26	0.8	41.79	43.90	2.03	45.93	10.0%	NO
13012	Basin Yard to North Yard	0.2	38.12	40.06	1.13	41.19	3.3%	NO
11891	Tower 210 to Rabbit Jct	0.5	35.28	37.08	0.02	37.10	6.5%	NO
12721	LS373 to HB008	1.4	32.99	34.67	0.00	34.67	0.0%	NO
124481	Tower 26 to Chaney Junction	3.1	28.68	30.10	2.00	32.10	12.7%	NO
124482	Chaney Junction to Eureka Jct	2.8	28.68	30.10	2.00	32.10	12.7%	NO
12725	SO011 to SO003	1.1	28.05	29.44	2.00	31.44	12.1%	NO
124662	Tower 26 to Congress Yard	1.4	26.44	27.79	0.00	27.79	12.6%	NO
124483	Eureka Jct to East Junction	9.3	23.68	24.85	1.88	26.73	12.5%	NO
12722	HB008 to A 229	1.7	22.85	24.02	0.00	24.02	13.6%	NO
124492	Settegast Jct to Gulf Coast Jct	2.9	16.27	17.08	0.05	17.13	7.1%	NO
12400	Dallerup to Tower 85	0.7	16.18	17.01	1.00	18.01	5.0%	NO
12399	Double Track Jct to South Yard	1.1	15.57	16.36	0.00	16.36	8.8%	NO
124663	Congress Yard to South Yard	1.9	15.57	16.36	0.00	16.36	8.8%	NO
12723	A 229 to A 227	1.4	11.19	11.74	0.06	11.80	10.7%	NO
124491	Houston to Settegast Jct	3.5	10.46	10.99	1.06	12.05	23.7%	NO
12398	TNO Jct to East Junction	6.8	7.41	7.79	0.00	7.79	0.0%	NO
12397	Tower 86 to Englewood	3.0	5.42	5.70	0.00	5.70	31.9%	NO
12231	Glass Yard to Dallerup	0.1	2.14	2.25	0.00	2.25	9.1%	NO

The three Texas segments in the Houston area marked YES are 10525 (Lafayette Subdivision from Dayton, 47.9 miles), 10526 (Lafayette Subdivision from Dawes, 24.7 miles) and 11249 (Dawes to Tower 87, 3.8 miles). Only 11249 reaches inside Loop 610. A fourth Texas segment marked YES, 10564 on the Carrizozo Subdivision, is in El Paso.

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. All are Union Pacific crossings. The table lists 79 Texas crossings in total: Liberty 14, Houston 13, Crosby 9, Beaumont 8, Dayton 7, El Paso 7, Nome 6, China 6, Raywood 4, Devers 2, Spring 2, Ames 1.

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

DOT number	Street	Subdivision	Milepost	Segment or yard
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
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 Neighborhoods 64 and 88, 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 boundaries; crossings outside the polygons are shown with their distance to the nearest Super Neighborhood 64 or 88 boundary, and the cutoff used here is 100 feet. AADT is the FRA-recorded annual average daily traffic count with its count year. 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	boundary, 28 ft	1,826 (2019)	2,303
288224V	Leeland Street	Houston West Belt Sub	235.01	in SN 64	3,405 (2019)	1,163
288221A	Cullen Boulevard	Houston West Belt Sub	235.10	in SN 64	7,451 (2019)	1,082
288226J	Milby Street	Houston West Belt Sub	234.71	in SN 64	1,767 (2022)	1,037
859523F	Lockwood Street	Galveston Sub	1.15	boundary, 34 ft	8,661 (2019)	906
859524M	Dumble Street	Galveston Sub	1.42	boundary, 38 ft	3,166 (2019)	684
288227R	McKinney Street	Houston West Belt Sub	234.57	in SN 64	2,044 (2019)	683
859521S	Oakhurst Street	Galveston Sub	0.79	boundary, 8 ft	235 (2019)	589
859518J	Milby Street	Galveston Sub	0.53	boundary, 29 ft	3,184 (2019)	565
288050B	Lawndale Street	Houston East Belt Sub	10.21	in SN 64	4,896 (2024)	564
288228X	York Street	Houston West Belt Sub	234.51	in SN 64	3,000 (2019)	466
288229E	Sampson Street	Houston West Belt Sub	234.45	in SN 64	2,909 (2022)	411
288051H	Telephone Road	Houston East Belt Sub	10.38	in SN 64	9,887 (2024)	402
859516V	Sampson Street	Galveston Sub	0.31	boundary, 10 ft	2,935 (2019)	395
859527H	Altic Street	Galveston Sub	1.65	boundary, 28 ft	1,045 (2019)	394
859517C	York Street	Galveston Sub	0.37	boundary, 28 ft	2,561 (2019)	374
288039B	Polk Street	Houston East Belt Sub	9.72	in SN 88	8,188 (2024)	351
288046L	Leeland Street	Houston East Belt Sub	9.88	in SN 88	282 (2024)	345
288048A	Jefferson Street	Houston East Belt Sub	9.99	in SN 64	676 (2024)	333
859519R	Private (UP)	Galveston Sub	0.60	boundary, 29 ft	1 (2019)	313
755351K	Lawndale Street	Harrisburg Sub	1.98	boundary, 36 ft	7,210 (2006)	50
859529W	Hughes Street	Galveston Sub	2.16	boundary, 21 ft	1,035 (2019)	40
859533L	Cesar Chavez Boulevard	Galveston Sub	2.47	boundary, 42 ft	744 (2019)	28
859530R	66th Street	Galveston Sub	2.35	boundary, 45 ft	3,090 (2019)	19
745046X	South 75th Street	Harrisburg Sub	2.29	boundary, 64 ft	11,363 (2019)	16
755353Y	Bobby Lee Street	Harrisburg Sub	2.81	boundary, 66 ft	330 (2019)	8
859538V	70th Street (Golf Course)	Galveston Sub	2.86	boundary, 52 ft	290 (2019)	4
755352S	Redwood Street	Harrisburg Sub	2.40	boundary, 63 ft	1,143 (2019)	3

Twenty-eight crossings, 2021 through 2025: 13,528 reports. First responders unable to cross: 6,389. Pedestrians climbing on, over or through train cars: 6,730. Blockages of two hours or more: 2,279, of which 314 ran six hours or more. Stationary train: 12,986. Gates activated with no train present: 216. Narratives naming children, students, schools or school buses: 528. Narratives describing one train blocking more than one crossing at once: 101.

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 crossing in Exhibit C.

Campuses inside Super Neighborhood 64 or Super Neighborhood 88

School campus	Address	Super Nbhd	Miles	Nearest crossing
KIPP Explore Academy	5402 Lawndale St	SN 88	0.10	Lawndale St (East Belt)
KIPP Intrepid Preparatory	5402 Lawndale St	SN 88	0.10	Lawndale St (East Belt)
KIPP East End High School	5402 Lawndale St	SN 88	0.10	Lawndale St (East Belt)
Lantrip Elementary	100 Telephone Rd	SN 64	0.25	Eastwood St (Galveston)
J.P. Henderson Elementary	1800 Dismuke St	SN 88	0.36	Telephone Rd (East Belt)
Yolanda Black Navarro Middle	5100 Polk St	SN 64	0.40	Dumble St (Galveston)
Eastwood Academy	1315 Dumble St	SN 64	0.41	Dumble St (Galveston)
High School for Law and Justice	3503 Coyle St	SN 64	0.42	Milby St (West Belt)
Briscoe Elementary	321 Forest Hill Blvd	SN 88	0.45	70th St (Galveston)
Project Chrysalis Middle	4528 Leeland St	SN 64	0.46	Cullen Blvd (West Belt)
Cage Elementary	4528 Leeland St	SN 64	0.46	Cullen Blvd (West Belt)
Carrillo Elementary	960 S Wayside Dr	SN 88	0.51	Cesar Chavez Blvd (Galveston)
Austin High School	1700 Dumble St	SN 64	0.60	Telephone Rd (East Belt)
George I. Sanchez Charter	6001 Gulf Fwy	SN 88	0.74	Bobby Lee St (Harrisburg)

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

School campus	Address	Miles
Houston Gateway Academy, Coral Campus	1020 Coral St	0.14
Houston Gateway Academy, Elite College Prep	7310 Bowie St	0.20
Tijerina Elementary	6501 Sherman St	0.33
Davila Elementary	7610 Dahlia St	0.43
Southmayd Elementary	1800 Coral St	0.47
Baylor Biotech Academy at Rusk	2805 Garrow St	0.50
Franklin Elementary	7101 Canal St	0.52
Burnet Elementary	5403 Canal St	0.52
East Early College High School	220 N Milby St	0.58
Edison Middle School	6901 Avenue I	0.61
Gallegos Elementary	7415 Harrisburg Blvd	0.72
De Zavala Elementary	7521 Avenue H	0.98
Milby High School	1601 Broadway St	0.99
YES Prep East End (two campuses)	8329 and 8401 Lawndale St	1.05
Brookline Elementary	6301 S Loop E	1.21

Jackson Middle School also serves this area and is not separately listed in the current NCES release under that name.

Emergency response facilities

Facility	Address	Miles	Position relative to the line
HFD Station 23	8005 Lawndale St	0.50	East of the East Belt
HFD Station 18	619 Telephone Rd	0.61	West of the East Belt
HFD Station 17	2805 Navigation Blvd	0.80	North of the West Belt
HFD Station 22 (HazMat)	7825 Harrisburg Blvd	0.85	East of the East Belt

Certificate of Service

I hereby certify that on this **September 20, 2026**, the foregoing document was served to all parties of record to this proceeding.

/ Lindsay Williams