



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**

Eastwood Civic Association, Houston, Texas





September 21, 2026

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

To Ms. Webster:

We are the Eastwood Civic Association. We are not a government body, and we do not speak for one. We are the households of Eastwood, a residential neighborhood of single-family homes about two miles east of downtown Houston, bounded by Harrisburg Boulevard, South Lockwood Drive, and Telephone Road.

Super Neighborhoods 64 and 88 and Super Neighborhood 63 are filing comments with your office today about how the Houston terminal should be studied. We join those filings, and we adopt them. We are writing separately to tell you what this looks like from our front doors, because the record you are about to build will be made of tables, and what happens here does not fit in one.

Eight of the twelve most-reported blocked railroad crossings in the United States are within six tenths of a mile of our neighborhood. We ranked every crossing in the Federal Railroad Administration's public blocked crossing record for 2021 through 2025, nationwide. Houston holds eight of the top twelve. All eight are ours. The other four are in Illinois, Ohio, and Tennessee.

Fourteen crossings lie within that six-tenths of a mile. Thirteen are public streets, and all fourteen are at grade. They drew 10,954 reports in five years. Exhibit A lists every one.

I. We have rail on three sides

The Galveston Subdivision runs along our northern edge, a few feet off Harrisburg Boulevard. Nine of its crossings are within six tenths of a mile of us. Eight are the public streets we use to go north: Sampson, York, Milby, Oakhurst, Eastwood, Lockwood, Dumble, and Altic. The ninth is a private Union Pacific crossing between Milby and Oakhurst. The Houston West Belt Subdivision runs along our western and southwestern edge, and five of its crossings are the streets we use to go that way: McKinney, York, Milby, Leeland, and Cullen. The Gulf Freeway is on the south.

Eastwood Street is the crossing our neighborhood is named after. It is the most-reported blocked crossing in the United States. It drew 2,303 reports over those five years, rising from 49 in 2021 to 908 in 2025.

National rank	DOT number	Street	Subdivision	Miles from Eastwood	Reports
1	859522Y	Eastwood Street	Galveston Sub	0.00	2,303
2	288224V	Leeland Street	Houston West Belt Sub	0.43	1,163



National rank	DOT number	Street	Subdivision	Miles from Eastwood	Reports
4	288221A	Cullen Boulevard	Houston West Belt Sub	0.45	1,082
5	288226J	Milby Street	Houston West Belt Sub	0.45	1,037
7	859523F	South Lockwood Drive	Galveston Sub	0.00	906
9	859524M	Dumble Street	Galveston Sub	0.24	684
10	288227R	McKinney Street	Houston West Belt Sub	0.51	683
12	859521S	Oakhurst Street	Galveston Sub	0.09	589

We are giving the Board the distances so it can check them. The rule we used is stated in Exhibit A, and we did not choose it to flatter the result. Cut the radius to half a mile, and seven of the top twelve are still here.

II. What the merger does to the two lines that box us in

We read Applicants' September 9 tables for the two segments that carry the crossings in Exhibit A. The Galveston Subdivision here is segment 124022, Tower 85 to Congress Yard, which covers our nine Galveston crossings from milepost 0.31 to 1.65. The West Belt here is segment 124663, Congress Yard to South Yard, which covers our five West Belt crossings from milepost 234.51 to 235.10.

Segment	The line it is	GIS mi	Yr 5 TPD no txn	Txn TPD	Yr 5 TPD w/ txn	Carloads added	Exceeds?
124022	Galveston Sub, our north edge	2.7	9.09	0.00	9.09	+31,459	NO
124663	West Belt, our west edge	1.9	16.36	0.00	16.36	+17,982	NO

Both lines gain freight. Neither gains a train. 49,441 more carloads a year will move past our houses on the same number of trains that move past them now.

We are homeowners, not engineers, and we still know what that means. The same number of trains carrying more cars means longer trains. A longer train takes longer to clear a crossing, and it stands across more of them at once while it waits. Both segments are marked NO, because the Board's test counts trains, and this transaction does not add any here.

That is the part we want you to see. What's being added to our neighborhood is exactly what the test does not measure.



III. What that means at our front doors

The nine Galveston Subdivision crossings on our northern edge run along 7,091 feet of track, from Sampson to Altic. Union Pacific reported a system-average train length of 9,729 feet in the fourth quarter of 2025. One train of that ordinary length, standing still, is longer than the whole row of them. When it stops, it does not block a crossing. It blocks the neighborhood.

Not one of our fifteen crossings is in a quiet zone. The federal crossing inventory records no whistle ban at any of them. Every train sounds its horn at every crossing, and the merger will make the trains longer without making them fewer.

A second issue has nothing to do with train length. Gates come down at our crossings with no train present, and it is getting worse fast:

Year	Reports of gates or lights activated with no train present
2021	8
2022	11
2023	16
2024	75
2025	76

186 times in five years, and 151 of those in the last two. The five West Belt crossings account for 138 of them, and Leeland and Cullen alone for 83. A resident wrote this on December 3, 2025:

“Crossing gate arms down with no train present. Vehicles, including an ambulance, went around the crossing gates. This is an untenable situation. Someone — train crews, vehicle occupants — will eventually be killed when a car goes around the arms, and a train comes”

IV. Our record, in our own words

Of the 10,954 reports at our fifteen crossings:

Count	What the reports state
5,837	First responders were observed being unable to cross the tracks
5,970	Pedestrians were observed climbing on, over, or through the train cars
1,624	Blockage of two hours or longer, including 235 of six hours or longer
10,524	A stationary train rather than a moving one, which is 96 percent of them
186	Gates or lights activated with no train present at all
242	The words child, student or school in the narrative, 133 of which also flag climbing



The trend runs one way: 549 reports in 2021, 1,581 in 2022, 1,253 in 2023, 3,914 in 2024, and 3,657 in 2025. 3,924 reports include a written narrative. They are our neighbors. A few, verbatim:

"This crossing was blocked at 6 a.m. when I walked my dog, at 8:30 a.m. when I returned with groceries, and again at 10:00 a.m. when we left for the park. The increase is completely unacceptable and unsafe for our neighborhood."

"Went to go grocery shopping at Kroger, Cullen was blocked. Found a way around, grocery shopped for an hour and train was still parked blocking access home. Big disruption"

"Pedestrians crawling through train with bikes and dogs. Little old women stuck with their groceries"

"Dismissal school, parents and children walking home were blocked by the train, no wonder they crawl under it"

"People trying to get to work, school, appointments, etc. desperately trying to find a route around the train by speeding through the neighborhood. Some who had no choice but to walk, had to climb under or over the train."

"A train has been blocking many intersections in a dense, urban area for hours. Houston was just hit by a hurricane, and many streets are filled with debris. This horrendous abuse of power is unconscionable at this time."

That last one is from July 11, 2024, three days after Hurricane Beryl made landfall on the Texas coast. We would ask the Board to hold onto it when it considers what this looks like in an emergency that affects the whole city at once.

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 because we filed them, and because there are 10,954 of them.

V. Our fire station is on the other side of the track

Houston Fire Department Station 18, at 619 Telephone Road, sits eight hundredths of a mile from our boundary. It is the station that answers here, and the nearest crossing to it is South Lockwood Drive on the Galveston Subdivision. The federal record names Station 18 by number, from crossings on both sides of us. The first two below come from Eastwood Street on our northern edge, the third from Cullen Boulevard on our western edge:

"Stopped for at least 8 HOURS - Critical safety crossing for Houston Fire Station 18"

"Ambulance from HFD Station 18 blocked. Houston Metro buses blocked from Lockwood."

"Houston Fire Station 18 ambulance blocked by gates down/no train present," And the report that says it plainest, from July 13, 2025:





“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 of our crossings, one train, and the ambulance ended up pointed back the way it came. A study that looks at Eastwood Street by itself will never find that. Neither will a study that looks at none of them, which is what is planned now.

Twelve school campuses sit within six tenths of a mile of us, listed in Exhibit B. Lantrip Elementary is five hundredths of a mile from our boundary and a quarter mile from the Eastwood Street crossing. Two more reports, both about children:

“children walking to school were seen going under train to get to school on time”

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

VI. What we ask you to study

- 1. Study the two lines that surround us.** Bring segments 124022 and 124663, and every crossing in Exhibit A, into the environmental review, whether or not they meet the numerical thresholds at 49 C.F.R. § 1105.7(e)(5). Eight of the twelve most-reported blocked crossings in the country are on them, and not one is in the study area now.
- 2. Analyze train length, because that is what is being added here.** Both of our segments gain carloads and gain no trains. Require Applicants to state the projected train lengths on each, and analyze how long a crossing stays blocked on that basis rather than on train count.
- 3. Analyze the crossings together, not one at a time.** Our nine Galveston Subdivision crossings lie within 7,091 feet of one another, less than the length of Union Pacific’s own average train. Study what one train does to all of them at once. Do the same for the five West Belt crossings on our other side.
- 4. Measure how long the gates are down, with timestamps.** A ten-minute reporting convention would leave most of what happens to us out of the record. We ask for gate downtime with entry and exit timestamps as the metric, with Applicants funding sensors where the signaling cannot measure it, and with the data publicly filed. We support the metrics proposed by the Western Chicagoland Merger Oversight Alliance at EI-34335 and ask that they apply in Houston.
- 5. Address the gates that come down with no train.** This is a signal and maintenance problem; it went from 8 reports a year to 76, and it is already sending ambulances around lowered gates. Please scope existing signal condition and maintenance practices at the crossings in Exhibit A, and require Applicants to state what the merger does to maintenance staffing and response times in the Houston terminal.
- 6. Study noise and vibration at the houses, not at a regional average.** None of our fifteen





crossings is in a quiet zone. Model horn noise and vibration at residential receptors within 500 feet of the Galveston Subdivision and the West Belt here, using the projected train lengths and the resulting horn and gate events. Homes on Eastwood, Oakhurst, Dumble and Lockwood back onto this track.

7. Model air quality where people sleep. Model concentrations at receptors within 1,000 feet of both lines using AERMOD or an equivalent, and quantify diesel particulate matter separately. A regional emissions inventory tells us nothing about the air on our block. We join the Joint East End Super Neighborhood Coalition's request at filing 310171 for monitors on rail lines within one mile of schools.

8. Reconcile the train counts before the scope is set. The federal crossing inventory records 4 through trains a day at our Galveston Subdivision crossings and 20 a day at our West Belt crossings. The September 9 Master Data Table reports 9.09 and 16.36 trains a day on the segments that carry them. We are not accusing anyone of anything, and the inventory is self-reported and may simply be stale. We ask the Board to put a current, verified count for each crossing in Exhibit A on this record, from Applicants' operating data, because the number that decides whether we get studied ought to be a number somebody has checked.

9. Study a shorter-train alternative and tell us what it would be worth. Analyze an alternative that holds train length over the Houston terminal to the longest usable receiving and departure track at the yard each train enters. Any length under 7,091 feet is the difference between one train blocking our whole northern edge and one train blocking part of it. We raise this as an alternative for the Environmental Impact Statement to analyze, not as an operating condition for the Board to impose.

10. Put a civic association on the distribution list. Eastwood Civic Association is not on the preliminary consultation distribution list, and neither is any other neighborhood organization in the East End. We ask to be added for the rest of the environmental review.

VII. Process

Please confirm whether you will issue a Draft Environmental Impact Statement. Counsel in this docket wrote to the Director of your office on August 28, 2026, stating that there will be no Draft in this proceeding and that the only opportunity for substantive comment will be in response to the Notice of Intent. That correspondence is on this record at EI-34305. If it is correct, this comment period and the scoping period after it are the only chances our residents will get, and we would like that said publicly.

When public meetings are scheduled for Houston, please hold more than one, and hold at least one in the evening with Spanish-language interpretation and Spanish materials. Most of our neighbors work during the day. Eastwood Civic Association will help with outreach and turnout, and we can offer a meeting space inside the neighborhood.

We would be glad to walk your staff across Eastwood Street.





VIII. Conclusion

Eight of the twelve most-reported blocked railroad crossings in the United States are within six tenths of a mile of our houses. Our neighbors filed 10,954 reports about them in five years, 5,837 of which describe first responders who could not get through. Applicants' own tables say the two lines that surround us will carry 49,441 more carloads a year and not one more train, which means longer trains standing across more of our streets for longer.

None of it is in the study area. We are asking you to put it there.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Lindsay Williams', is positioned below the 'Respectfully submitted,' text.

Lindsay Williams

President, Eastwood Civic Association
Houston, Texas

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Exhibit A. Crossings within six tenths of a mile of Eastwood, and the federal blocked crossing record

Sources: crossing identity, subdivision, milepost, traffic count and whistle ban 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. The Eastwood boundary used here is the area enclosed by Harrisburg Boulevard, South Lockwood Drive, and Telephone Road, built from Census road centerlines; distance is measured from that boundary, not from the center of the neighborhood. National rank is out of every crossing in the United States over the same five years. Through trains per day is the figure Union Pacific carries in the crossing inventory.

DOT number	Street	Subdivision	MP	Miles	Quiet zone	Trains/day	Reports	Rank
859522Y	Eastwood Street	Galveston Sub	0.93	0.00	No	4	2,303	1
288224V	Leeland Street	Houston West Belt Sub	235.01	0.43	No	20	1,163	2
288221A	Cullen Boulevard	Houston West Belt Sub	235.10	0.45	No	20	1,082	4
288226J	Milby Street	Houston West Belt Sub	234.71	0.45	No	20	1,037	5
859523F	South Lockwood Drive	Galveston Sub	1.15	0.00	No	4	906	7
859524M	Dumble Street	Galveston Sub	1.42	0.24	No	4	684	9
288227R	McKinney Street	Houston West Belt Sub	234.57	0.51	No	20	683	10
859521S	Oakhurst Street	Galveston Sub	0.79	0.09	No	4	589	12
859518J	Milby Street	Galveston Sub	0.53	0.35	No	4	565	
288228X	York Street	Houston West Belt Sub	234.51	0.55	No	20	466	
859516V	Sampson Street	Galveston Sub	0.31	0.57	No	4	395	
859527H	Altic Street	Galveston Sub	1.65	0.47	No	4	394	
859517C	York Street	Galveston Sub	0.37	0.51	No	4	374	
859519R	Private (UP)	Galveston Sub	0.60	0.28	No	4	313	

Fourteen crossings, thirteen of them public streets and one a private Union Pacific crossing, all fourteen at grade: 10,954 reports. First responders unable to cross: 5,837. Pedestrians climbing on, over or through train cars: 5,970. Blockages of two hours or more: 1,624, of which 235 ran six hours or more. Stationary train: 10,524. Gates activated with no train present: 186. Narratives using the words child, student or school: 242, of which 133 also flag climbing. By subdivision: Galveston 6,523, Houston West Belt 4,431. By year: 549, 1,581, 1,253, 3,914, 3,657.





Half-mile test. Cutting the radius from 0.6 of a mile to 0.5 leaves ten crossings, 9,036 reports, and seven of the national top twelve. The four crossings the wider radius adds are McKinney Street (683 reports), York Street on the West Belt (466), Sampson Street (395) and York Street on the Galveston Subdivision (374). All four carry reports in the hundreds, so nothing here turns on where the line is drawn. One further crossing lies within six tenths of a mile and is left out of this exhibit: the Gulf Freeway northbound frontage road at West Belt milepost 235.56, which is grade-separated and carries no blocked crossing reports.



Exhibit B. School campuses and emergency response near Eastwood

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. The first distance is to the Eastwood boundary described in Exhibit A; the second is to the nearest public crossing in Exhibit A.

School campuses within six tenths of a mile of Eastwood

School campus	Address	Mi to Eastwood	Nearest crossing in Exhibit A	Mi
Lantrip Elementary	100 Telephone Rd	0.05	Eastwood St (Galveston)	0.24
Cage Elementary	4528 Leeland St	0.14	Cullen Blvd (West Belt)	0.40
Project Chrysalis Middle	4528 Leeland St		Cullen Blvd (West Belt)	0.40
Eastwood Academy	1315 Dumble St		Dumble St (Galveston)	0.40
Austin High School	1700 Dumble St		Cullen Blvd (West Belt)	0.61
Community Services SEC	1102 Telephone Rd		Dumble St (Galveston)	0.62
Yolanda Black Navarro Middle	5100 Polk St		Altic St (Galveston)	0.38
East Early College High School	220 N Milby St		Oakhurst St (Galveston)	0.57
Middle College High School at HCC Fraga	301 N Drennan St		Oakhurst St (Galveston)	0.60
Ripley House Charter School	4410 Navigation Blvd		Eastwood St (Galveston)	0.63
Ripley House Middle Campus	4414 Navigation Blvd		Eastwood St (Galveston)	0.63
Laurenzo Early Childhood Center	205 N Delmar St		Altic St (Galveston)	0.48

Emergency response facilities

Facility	Address	Mi to Eastwood	Position
HFD Station 18	619 Telephone Rd	0.08	South of Eastwood; nearest crossing is S Lockwood Dr on the Galveston Sub
HFD Station 17	2805 Navigation Blvd	0.96	Northwest, on the far side of the Galveston Sub





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.

Lindsay Williams

