Lindsay Williams
1322 Milby St.
Houston, TX 77003
williamslindsay123@gmail.com

July 23, 2026

Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423

Re: Finance Docket No. 36873, Union Pacific Corporation and Norfolk Southern Corporation, Control and Merger

Comment on the Reliability of the Applicants' Houston Traffic Data and the Operational Impacts the Application Does Not Count

To the Members of the Board:

I am a resident of Eastwood in Houston's East End, and I have previously submitted comments in this docket regarding blocked crossings and train length. This comment addresses a more basic concern: whether the data being presented to the Board accurately reflects actual conditions.

Applicants' traffic figures are inconsistent with their own operating data, federal research, State of Texas data, City of Houston crossing sensor records, and observable conditions documented by residents. Given these discrepancies, the Board should require validation of the underlying data before relying on the Applicants' impact projections for communities such as mine.

Existing Houston Terminal Rail Traffic Undercounted

The Applicants' filing presents two materially different representations of rail activity in Houston. The operating plan workpapers submitted as Document 311221 project post-merger traffic using a model that counts only UP and NS road trains (Electronic Appendix T). The same filing's 2024 density data (Electronic Appendix C) reflects actual network activity, including local trains and movements by other railroads operating over UP infrastructure.

Those two data sets show substantially different levels of activity on the very rail segments that run through East Houston neighborhoods:

Houston line segment	Operating plan, road trains only (App. T)	Actual 2024 density, all trains (App. C)	Independent measurement
Terminal Sub, Tower 26 to Tower 87	34 to 41 per day	85 per day	TxDOT: East Belt 80 to 90; West Belt 65 to 75 (all trains)
Palestine Sub, Spring to Belt Junction	15.5 per day	74 per day	

Galveston Sub (GH&H), Tower 30 south	1.3 per day	up to 21 per day	TxDOT: 7-8 per day; resident video counts, see below
Sealy to Alvin (shared BNSF line)	1.4 per day	up to 49 per day	

Both sets of figures come from the Applicants' own filing. The difference is not the underlying location—it's the method of counting.

The operating plan excludes local trains and yard movements and does not include trains from other carriers – including BNSF, Amtrak, and CPKC – operating over the same infrastructure. The Texas Department of Transportation's Houston-Beaumont Region Freight Study found that these types of movements represent a significant share of Houston network rail activity.

Residents experience every train movement, regardless of how it is categorized in a modeling exercise. When Applicants state a segment will experience "one more train per day," that increase is being measured against a baseline that excludes a substantial portion of the trains already moving through these communities.

Applicants' Certified Crossing Data Fails Independent Review

The railroad's certified crossing data presents a picture of rail activity that is inconsistent with multiple independent sources. Under 49 CFR 234.409, the operating railroad must certify accurate and current train counts for every crossing at least once every three years.

At Hirsch Road in Houston's Fifth Ward (FRA Crossing 755640L), Union Pacific has repeatedly certified that zero through trains operate at the crossing, including a certification submitted as recently as March 2025. Yet City of Houston crossing sensors record approximately eight daily train movements, with each movement blocking the roadway for an average of 21 minutes.

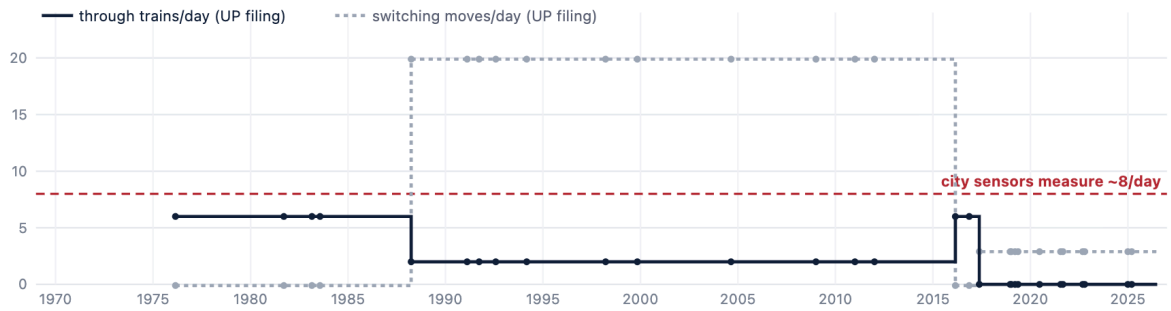
The FRA-sponsored research report "Assessing the Safety Benefits of a Real-Time Railroad

Crossing Information System for Emergency Responders" (Report DOT/FRA/ORD-25/02, January 2025, Table 7) documented weekly emergency responder delays at a crossing where Union Pacific certifies zero through trains. TxDOT's Houston-Beaumont Region Freight Study likewise identified the location for potential grade separation based on recurring crossing impacts.

Three arms of government have documented train activity at a crossing the railroad certifies as having no through trains.

Below is a screenshot of an interactive chart made to demonstrate the differences in reported trains from Union Pacific vs the City of Houston Sensor program:

Hirsch Road FRA Crossing 755640L · Settegast area, Fifth Ward



City sensors: about 8 movements/day averaging 21 minutes each. UP has certified ZERO through trains since May 2017, most recently March 2025.

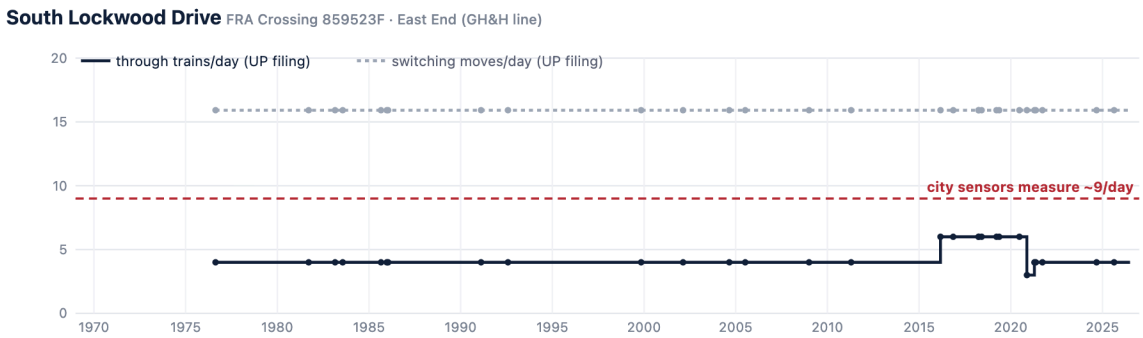
City sensors: about 8 movements/day averaging 21 minutes each. UP has certified ZERO through trains since May 2017, most recently March 2025.

▼ Full revision record (29 filings)

Revision date	Through/day	Switching/day	Filed by	Reason given
1976-02-24	6	0	SP	Change in Data
1981-09-16	6	0	SP	Change in Data
1983-02-23	6	0	SP	Change in Data
1983-07-26	6	0	SP	Change in Data
1988-03-28	2	20	SP	Change in Data
1991-02-11	2	20	SP	Change in Data
1991-09-23	2	20	SP	Change in Data
1992-07-29	2	20	SP	Change in Data
1994-03-01	2	20	SP	Change in Data
1998-03-18	2	20	UP	Change in Data
1999-11-04	2	20	UP	Change in Data
2004-08-23	2	20	UP	Change in Data
2009-01-01	2	20	UP	Change in Data
2011-01-01	2	20	UP	Change in Data
2012-01-01	2	20	UP	Change in Data
2016-02-25	6	0	UP	Change in Data
2016-11-11	6	0	UP	Change in Data
2017-05-18	0	3	UP	Change in Data
2018-12-20	0	3	UP	Change in Data
2019-01-08	0	3	UP	Change in Data
2019-03-18	0	3	UP	Admin Correction
2019-05-13	0	3	UP	Admin Correction
2020-06-19	0	3	UP	Admin Correction
2021-07-20	0	3	UP	Change in Data
2021-08-31	0	3	UP	Change in Data
2022-09-06	0	3	UP	Date Change Only
2022-10-14	0	3	UP	Change in Data
2024-12-30	0	3	UP	Change in Data
2025-03-12	0	3	UP	Change in Data

At South Lockwood Drive and York Street, the certified counts of 4 through trains and 16 switching movements have remained essentially unchanged since they were first reported by the Galveston, Houston and Henderson in the 1970s; Union Pacific re-certified those same figures in August 2025.

By contrast, at Commerce Street, the certified count of 25 matches City sensor data exactly, demonstrating that accurate reporting is achievable. The complete revision history for eight East Houston crossings, compiled from FRA's public historical file, is included as an exhibit.



City sensors: about 9 movements/day. The 4 through + 16 switching figures date to the 1970s GH&H filings.

The data must be evaluated in context. At first glance, the graph above may suggest that City sensor data falls between Union Pacific's reported through-train and switching-train counts. However, that interpretation overlooks a critical issue: according to discussions with Union Pacific operations personnel and Gulf Coast Rail District representatives, this segment does not regularly experience switching activity. If so, the reported switching-movement figures raise further questions about the reliability of the underlying data.

The State of Texas could not verify these numbers either. The 2024 Texas Rail Plan, the State's federally required rail planning document, lists "Average Number of Trains per Day: Unknown" for every Union Pacific subdivision in the Houston Service Unit, and flags several entries as unable to be confirmed. If the State of Texas cannot obtain or verify train counts from this railroad for a statutory planning document, the Board should not assume the counts in a merger application are reliable.

Community measurement keeps finding the same thing. The City of Houston's smart crossing sensors, reported monthly through the Rail Safety Task Force, measure daily train activity at seven East End crossings. Trainfo sensors collect data at 94 crossings. In addition, residents conduct manual video counts on the Galveston Subdivision, with results consistently exceeding the volumes reported in Applicants' operating plan.

Monthly Summary: Train Throughput & Blockages

Crossing: Eastwood & Rusk (859522Y - GALVESTON SUB)

2025	Month	Jan 2025	Feb 2025	Mar 2025	Apr 2025	May 2025	Jun 2025	Jul 2025	Aug 2025	Sep 2025	Oct 2025	Nov 2025	Dec 2025	Total 2025	Average
	# of Trains	126	209	238	230	249	257	251	136	213	156	153	94	2312	193
	# of Trains w/ Blockage >10 Minutes	19	55	82	59	59	88	55	34	49	44	41	24	609	51
	% of Trains w/ Blockage >10 Minutes	15%	26%	34%	26%	24%	34%	22%	25%	23%	28%	27%	26%	26%	26%
	Total Duration of Blockages (hrs)	10.80	17.10	44.55	30.78	30.40	36.77	28.73	16.15	24.47	25.52	18.32	17.52	301.10	25.09
	% of month w/ a Blockage	2%	3%	6%	4%	4%	5%	4%	4%	3%	4%	3%	5%	4%	4%
	Longest Single Blockage (Hours)	3.63	1.75	2.87	3.62	3.20	2.25	4.73	2.22	2.32	6.20	1.13	5.18	6.20	3.26
	# of Trains per Day	5.25	7.46	7.68	7.67	8.03	8.57	8.10	8.50	7.10	6.50	6.65	6.71	7.41	7.35
	Avg. Length of Blockage (Minutes)	34.11	29.96	32.60	30.78	29.90	25.07	31.35	26.92	29.96	34.02	26.17	43.79	374.62	31.22
	# of days in month	*24*	*28*	*31*	*30*	*31*	*30*	*31*	*16*	*30*	*24*	*23*	*14*	*312*	*26*
		* 7 days missing							*15 days missing		*7 days missing	*7 days missing			

Monthly Summary: Train Throughput & Blockages

Crossing: Eastwood & Rusk (859522Y - GALVESTON SUB)

2026	Month	Jan 2026	Feb 2026	Mar 2026	Apr 2026	May 2026	Jun 2026	Jul 2026	Aug 2026	Sep 2026	Oct 2026	Nov 2026	Dec 2026	Total 2025	Average
	# of Trains	138	204	226	183	132	170	69						1122	160
	# of Trains w/ Blockage >10 Minutes	42	58	70	63	42	43	16						334	48
	% of Trains w/ Blockage >10 Minutes	30%	28%	31%	34%	32%	25%	23%						30%	29%
	Total Duration of Blockages (hrs)	17.20	26.72	36.05	32.72	32.85	-7.27	4.70						142.97	20.42
	% of month w/ a Blockage	3%	4%	5%	5%	8%	-1%	2%						4%	4%
	Longest Single Blockage (Hours)	2.25	2.20	1.77	2.40	12.33	1.37	0.77						12.33	3.30
	# of Trains per Day	6.57	7.29	7.29	7.32	7.76	7.08	6.90						7.19	7.17
	Avg. Length of Blockage (Minutes)	26.76	27.64	30.90	31.16	46.93	22.50	17.62						203.51	29.07
	# of days in month	*21*	*28*	*31*	*25*	*17*	*24*	*10*						*156*	*22*
					*5 days missing	*13 days missing									

Notes about the above: *The counts above were derived from manual review of surveillance camera footage. This location provides a useful proxy for South Lockwood crossing (FRA 859523F) because it is located one block away. A train occupying approximately 14 cars east of this point can block South Lockwood. Accordingly, observed train movements at this crossing closely correspond to the movements affecting South Lockwood in both directions.*

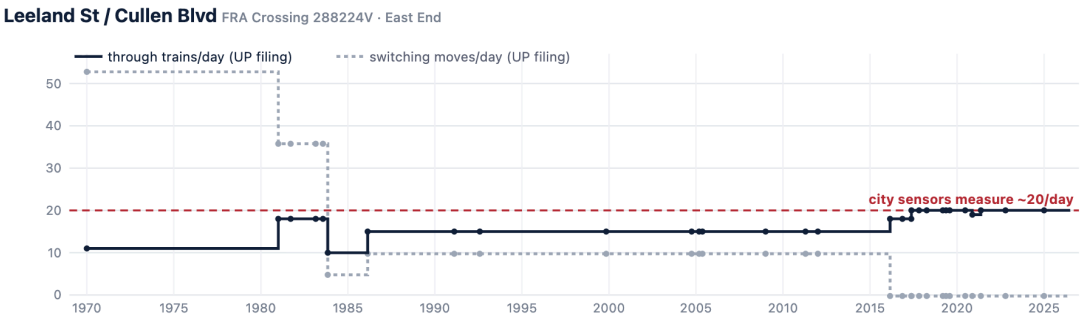
The reported daily train average is calculated using the total number of trains observed divided by the number of days for which data was collected, not the total number of calendar days in the month.

Where measurement exists, it agrees with Appendix C and disagrees with the picture the plan presents.

What this means for the application. The projected impacts in this docket—including added trains per day, blocked crossing estimates, and the mitigation commitments sized to those estimates—depend on the accuracy of the underlying baseline. If that baseline understates existing rail activity in affected communities, then the resulting impact projections will also understate potential harms, and the corresponding mitigation measures may be insufficient.

These discrepancies also affect the weight the Board should give the Applicants' analysis. The same Applicant asking the Board to rely on its operating model has certified crossing data that appears inconsistent with independent data, including research sponsored by its own regulator. The Board should require the underlying data to be validated before relying on projections derived from it.

The impacts the application does not count are the ones we live with. The plan's counting rules exclude precisely the operations that block our streets longest. In my neighborhood, the railroad builds trains, idles them, and performs air brake tests across residential crossings. At Leeland Street (FRA Crossing 288224V) and Cullen Boulevard (FRA Crossing 288221A), I observe trains being assembled daily and idling for hours. The federal record corroborates this: 1,198 blocked-crossing reports totaling about 1,659 hours at that crossing from 2022 through 2025, and the City's sensors log 10 to 20 blockages exceeding 1 hour every month. None of that activity appears in the plan's trains-per-day.



City sensors: about 20 movements/day. Current filing of 20 matches.

Similar to the Eastwood and Lockwood crossings, Leeland and Cullen are only ~100 yards apart. When one has a passing train, the other has the same amount.

The physical cause is documented in my prior exhibits in this docket. Union Pacific's average train is now 9,729 feet by its own reporting, and trains of 14,000 to 16,000 feet operate through the Houston complex, while the East End yard tracks where those trains are assembled hold roughly 5,000 feet. A 15,000-foot train built in a 5,000-foot yard leaves about two miles of train hanging on the main line and across neighborhood crossings while it is assembled and brake tested. The merger proposes to add trains to this same plant: five more per day on the Lafayette corridor, about two more across the Terminal Subdivision and Glidden corridors, with the busiest segment reaching 51 trains a day by the plan's own count, which excludes the switching just described.

One crossing shows the arithmetic. At South Lockwood Drive (FRA Crossing 859523F), using only the figures Union Pacific has certified to FRA, 4 through trains and 16 switching movements- the crossing is inaccessible roughly seven hours a day in a neighborhood near schools, rising further with the additional train the growth plan assigns to that segment, a 25 percent increase in through traffic.

If Union Pacific answers that the true figure is lower, then the data it certified under 49 CFR 234.409 is wrong and has been wrong for decades. Either the certified data is accurate, and the crossing is unavailable for much of the day, or the certified data is inaccurate, and the Board is being asked to approve a merger on numbers the railroad itself cannot stand behind.

Measured conservatively from City sensor data alone, the crossing is occupied or blocked between two and three hours a day before the merger adds anything. The State of Texas has already documented the mechanism at this crossing. The 2024 Houston-Beaumont Region Freight Study Update (draft, April 2024) found that trains delayed by West Belt congestion hold between GH&H Junction and Tower 85 and "will block grade crossings," naming Oakhurst Street, Eastwood Street, Lockwood Drive (859523F), Dumble Street, and Altic Street. The same study describes 8,500 feet of track clear of crossings as "a rarity in the complex." The state's remedy for the blockage at my crossings is infrastructure; nothing in the Applicants' plan builds it.

The merger crosses the Board's own environmental thresholds, by the Applicants' own numbers. All eight counties of the Houston complex are a Clean Air Act ozone nonattainment area, so the Board's environmental rules apply their lower screening thresholds: under 49 CFR 1105.7(e)(5)(ii), air quality analysis and a State Implementation Plan conformity statement are required where a proposal increases

traffic by at least three trains a day or 50 percent in gross ton miles on any segment, or increases rail yard activity by at least 20 percent in carloads. The Applicants' workpapers cross both. The Lafayette Subdivision segments from Dawes to Tower 87, from Dawes to Dayton, and from Dayton to Beaumont each gain exactly 5 trains per day. And the Applicants' own threshold screening, Electronic Appendix Q of Document 311221, lists Englewood Yard at 2,044 cars per day in the base plan rising to 2,456 in the growth plan, an increase of 20.1 percent, the second largest yard increase in the country on their list. The yard that crosses the Board's environmental threshold is the same yard whose train building, idling, and brake testing already spill across our residential crossings. Yet the yard data underlying that determination, Electronic Appendices F, J, and N, is redacted as highly confidential, so the communities most affected cannot verify a figure that clears the 20 percent line by barely one-tenth of a percentage point, computed on the same unverified baseline described above.

What I ask the Board to do.

1. Require the Applicants to reconcile Electronic Appendices C and T of Document 311221 for the Houston complex, and to state, crossing by crossing, the current and projected daily train movements including local trains, yard and switching movements, and tenant railroads, and to state whether the operating plan assumes construction of any of the rail improvements identified in the 2024 Update of the Houston-Beaumont Region Freight Study.

2. Require independent verification of the Houston baseline before the operating plan is given evidentiary weight, using the City of Houston sensor program, the East End District's Trainfo data for 94 crossings, and community counts, and direct that the environmental review use the verified baseline rather than the plan's road-train counts.

3. Refer the crossing inventory discrepancies identified here, including Hirsch Road, to the Federal Railroad Administration for corrective action under 49 CFR Part 234, Subpart F.

4. Require the air quality analysis and State Implementation Plan conformity statement contemplated by 49 CFR 1105.7(e)(5)(ii) for the Lafayette Subdivision segments gaining five trains a day and for Englewood Yard's 20.1 percent carload increase, computed from a verified baseline, and direct that the yard data underlying Electronic Appendix Q be made available to the environmental reviewers and, under appropriate protective order, to affected communities.

5. Condition any approval on enforceable Houston terminal protections: no train assembly, staging, or air brake testing across public crossings in residential neighborhoods; train length limits for the Houston complex consistent with my June 23, 2026 comment; funded grade separations at the crossings the region has already identified; funding of the three rail improvements shortlisted in the 2024 Update of the state's Houston-Beaumont Region Freight Study (the BNSF Mykawa second track, about $75 million; the UPRR Galveston Subdivision second track from Tower 85 to Katy Neck, about $178 million; and the HB&T East Belt second track over Buffalo Bayou), which the state's modeling shows reduce delay across the complex, including a 26 percent reduction on the West Belt; and binding blocked crossing reduction targets measured against the verified baseline, with financial penalties.

6. Until the data is validated, treat the application's Houston impact projections as unproven. Communities like mine are being asked to absorb more trains based on numbers that no independent party has been able to confirm and that the Applicants' own documents contradict.

7. Require a full impact study for the post-merger blocked crossing activity for the Houston complex, with the corrected and validated data, and provide this data for feedback on mitigation, long before an environmental study is completed.

This comment is submitted for the merits record and also for the environmental review record, so that the Office of Environmental Analysis has it when the environmental review resumes.

The East End has measured, recorded, and documented what we live with. We ask the Board to require the railroad to meet the same standard before it is allowed to add to it.

Respectfully,

Lindsay Williams
1322 Milby St.
Houston, TX 77003

Exhibits referenced: UP Crossing Count History Exhibit (FRA Form 71 revision histories, eight East Houston crossings, 1970 to 2026, with City sensor comparison); Train Count Validation memorandum (source comparison table); East End Control-Point Spacing vs. Modern Train Length and How Longer Trains Block East Houston, previously filed. Sources include STB Docket FD 36873 Document 311221, Electronic Appendices C, Q and T; 49 CFR 1105.7(e)(5)(ii); FRA Crossing Inventory Data, Historical; FRA Report DOT/FRA/ORD-25/02 (January 2025); City of Houston Rail Safety Task Force sensor reports (2023 to 2026); 2024 Texas Rail Plan, Appendix A, Table A-7; TxDOT Houston Region Freight Study and Houston-Beaumont Region Freight Study 2024 Update (draft, April 2024), Section 4 and Appendix F; East End District Impact Study (May 2023); FRA Blocked Crossing Incident Reports (2022 to 2025).

Source Index

Finance Docket No. 36873 | Comment of Lindsay Williams, Eastwood, Houston, TX

Exhibits referenced in the comment

Ex.	Title	Contents
A	East End Control-Point Spacing vs. Modern Train Length	Tower-to-tower segment distances (from TxDOT mileposts) compared with modern train lengths.
B	Interactive Maps	Interactive maps built using UPRR FRA Crossing Inventory Data to show the ripple effect of stopped trains on additional lines and discrepancies in what is being reported to the FRA vs. what is being measured.

Source index

#	Source	Where to find / status
1	STB Docket FD 36873, Document 311221, Electronic Appendices C, Q, and T (Applicants' filing).	Locate in STB record search; docket materials also at UP-NS EIS site. Confirm the exact document number.
2	49 CFR 1105.7(e)(5)(ii) (STB environmental report content).	eCFR 49 CFR 1105.7
3	FRA Highway-Rail Crossing Inventory Data, historical (Form 71).	FRA Crossing Inventory (data portal: crossings.dot.gov).
4	FRA Report DOT/FRA/ORD-25/02, January 2025.	FRA eLibrary. Search the report number at railroads.dot.gov/elibrary.
5	City of Houston Rail Safety Task Force sensor reports, 2023 to 2026.	Your files / City of Houston (Smart City Program). Includes the Houston Safe Railroad Corridors deck already provided.
6	2024 Texas Rail Plan, Appendix A, Table A-7.	2024 Texas Rail Plan | Appendices (incl. Appendix A)
7	TxDOT Houston Region Freight Study (Section 4, Appendix F).	On file (provided). Original TxDOT study.
8	Houston-Beaumont Region Freight Study, 2024 Update (draft, April 2024), Section 4 and Appendix F.	Houston-Beaumont 2024 Update (draft) | study page
9	East End District Impact Study, May 2023.	East End District Business Impact Study
10	FRA Blocked Crossing Incident Reports, 2022 to 2025.	FRA Blocked Crossing portal

Note: Links point to the public source. Items marked as needing data require the eight crossing IDs (Exhibit C) or the City sensor and Table A-7 figures (Exhibits C and D).

Exhibit A. East End Control-Point Spacing vs. Modern Train Length

Finance Docket No. 36873 | Comment of Lindsay Williams, Eastwood, Houston, TX

Union Pacific runs trains longer than the distance between the control points where those trains can be routed or held in the East End, so a stopped train blocks several road crossings at once.

The East End terminal was built as a lattice of closely spaced control points, still identified by their historic "Tower" designations and used operationally today. Using the mileposts stated in the TxDOT Houston Region Freight Study, the distance between adjacent control points runs from about 0.60 miles to 3.89 miles:

Control-point segment	Subdivision	Mileposts	Distance	Length in feet
Tower 71 to Tower 210	Lufkin	MP 1.50 – 2.10	**0.60 mi**	3,168 ft
Tower 26 to Tower 71	Lufkin	MP 0.74 – 1.50	**0.76 mi**	4,013 ft
Tower 86 to Tower 85	East Belt	MP 7.60 – 9.40	**1.80 mi**	9,504 ft
Tower 210 to Tower 76	Lufkin	MP 2.10 – 4.10	**2.00 mi**	10,560 ft
Tower 87 to Tower 86	East Belt	MP 4.70 – 7.60	**2.90 mi**	15,312 ft
Tower 26 to Tower 87	Terminal	MP 356.80 – 360.69	**3.89 mi**	20,539 ft

Distances are approximate, derived from the mileposts in the TxDOT Houston Region Freight Study, Existing Conditions section.

Modern train length, for comparison

- TxDOT study benchmark: a "long" modern train of 120 cars, 12,000 tons, and 7,200 feet.
- Union Pacific system average: 9,729 feet (Q4 2025 record), and rising.
- GAO: some trains near 14,000 feet by 2021; railroads run trains over 12,000 and over 16,000 feet; about 25 percent exceed 7,500 feet.

A train of 14,000 to 16,000 feet is longer than five of the six segments above. On those segments, a single stopped train is longer than the entire distance between the points where it can be routed or held, so it must sit across the road crossings in between. The TxDOT study reached the same conclusion, finding that delay 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."

Exhibit B. Interactive Maps

Interactive map demonstrating the impact of the merger in the community.

Interactive graph of the discrepancies along with the revision history of the Federal Railroad Administration Crossing Inventory.

Interactive heat map showing the UP Blocked Crossings from the Federal Railroad Administration's Blocked Crossing Portal

CERTIFICATE OF SERVICE

I hereby certify that on this 23 day of July, 2026, the foregoing document was served on all parties of record to this proceeding.

/s/ Lindsay Williams