



September 15, 2026

Hon. Jenifer J. Soulikias
Administrative Law Judge
Surface Transportation Board
395 E Street, SW
Washington, DC 20423-0001

Parties of Record
Docket No. 36873

Dear Judge Soulikias,

The Hosford-Abernethy Neighborhood District (HAND) is a neighborhood association representing the Hosford-Abernethy neighborhood in inner Southeast Portland, immediately north of Union Pacific Railroad's (UPRR) Brooklyn Yard. We are writing to raise concerns about the impact of UPRR's rail crossing practices on our community, and to ask that these concerns be addressed as part of the review of UPRR's proposed merger with Norfolk Southern.

Our neighborhood contains three at-grade UPRR crossings, at SE 12th, SE 11th, and SE 8th. The crossings at SE 12th and 11th are part of one of the few continuous north-south corridors through this part of Southeast Portland, and the SE 8th crossing also carries Portland's highest-speed/frequency FX bus line.

Brooklyn Yard is too small for the trains UPRR assembles there, so rail crews routinely build trains across our three heavily-traveled crossings rather than within the yard itself. Track geometry to the north further limits train speeds through the neighborhood, so when a train is moving rather than being built, it often moves slowly -- no faster than a brisk walking pace. Some of these trains are approaching three miles in length. The impact of the combination of train building, long trains, and slow passage is that our crossings are blocked frequently, and sometimes for hours at a stretch. UPRR holds sufficient right-of-way south of Brooklyn Yard that, in our opinion, could accommodate at least some train-building activity, but instead

continues to rely on using the surrounding neighborhood rather than spend the money to extend their train-building facilities to the south.

Independent data corroborates the severity of the problem: the rail-tracking app **TrainSnap** has clocked the nearby SE 12th and Division crossing as being blocked by freight trains almost 100 hours a month. Residents have been stranded at these crossings for hours at a time, and can actually become trapped for the duration at some locations, especially at the SE 11th crossing. Some folks on foot get impatient enough that they climb between the stopped rail cars, which can be quite dangerous if the train jolts suddenly as it occasionally does.

The proposed merger between UPRR and Norfolk Southern is expected to increase train traffic through Brooklyn Yard by roughly 22 percent, a significant worsening of an already difficult situation. We are not alone in raising this concern: the Central Eastside Industrial Council and the Brooklyn Action Corps have also filed comments regarding the merger's effect on the neighborhood, and the Surface Transportation Board has itself determined that the increased traffic from this transaction exceeds the threshold requiring a full Environmental Impact Statement. Federal regulations require merger applicants to specify what measures they will take to address potential blocked-crossing impacts from increased traffic.

Given this, the HAND Board respectfully asks that, before any merger is approved, UPRR and Norfolk Southern be mandated to work cooperatively with our community and the City of Portland to reduce both the frequency and duration of these excessive crossing closures.

Thank you for your consideration,

/s/ Chris Eykamp

Writing for the HAND Board