

March 16, 2026

Submitted via e-file at <https://www.stb.gov/>

Karen Stevens
Surface Transportation Board
Docket No. FD 36854
395 E Street SW
Washington, DC 20423

RE: Docket No. FD 36854, Union Pacific Railroad Company – Construction and Operation Exemption – Matagorda County, Texas; Preliminary Consultation

Dear Ms. Stevens,

The Lower Colorado River Authority (LCRA) submits the following comments in response to your February 13, 2026, request for information regarding environmental resources potentially affected by the proposed construction and operation of approximately five (5) miles of new rail line in Matagorda County.

As a conservation and reclamation district, LCRA has no taxing authority and generates revenues and fees from its core operations of electric generation, electric transmission, and water services. LCRA is responsible for managing water resources and protecting the environmental health of the regions we serve.

Based on our preliminary review of the Wadsworth Industrial Lead project, we have identified several potential environmental impacts and concerns for consideration that must be addressed in the Surface Transportation Board's upcoming environmental review under the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA):

1. Water Quality and Canals

- **Infrastructure Impacts:** LCRA operates a network of canals throughout the area that supply water for irrigated agriculture, industries, and other beneficial purposes. The proposed line will intersect and will run parallel to some of LCRA's irrigation canals. The environmental review must evaluate potential impacts to the integrity of these canals during construction and operation.
- **Contamination Risks:** Any releases or suspected release of petroleum hydrocarbons or other hazardous materials during construction or operation of the rail line, including transport of and releases from rail cars holding such materials pose a significant risk to the environment, including impacts to soil and water quality within LCRA, the irrigation canals, and adjacent properties. Further, such release could significantly impact the

quality of water conveyed through these canals by LCRA to its customers, potentially impairing its ability to be used for its intended purpose(s). Moreover, contamination of any water LCRA conveys through its canals may infiltrate into shallow groundwater and/or affect local ecosystems that benefit from water conveyed through LCRA canals. The Surface Transportation Board's environmental review should ensure that adequate spill prevention and response measures are in place to protect against such impacts.

- **Runoff Management:** Construction-related soil disturbance and increased impervious surfaces from the rail line could lead to sedimentation and polluted runoff entering the LCRA irrigation canal system. The Surface Transportation Board's environmental review should ensure that adequate stormwater management plans are in place to protect against such impacts.

2. Biological and Natural Resources

- **Endangered Species:** The project area is within or in the vicinity of critical habitats for sensitive species and LCRA requests an assessment of potential impacts.
- **Wetlands and Waters of the U.S.:** The review should identify all jurisdictional wetlands and Waters of the United States (including jurisdictional wetlands) that may be impacted by the project and ensure compliance with any required permitting under Section 404 of the Clean Water Act.

3. Construction Impacts

- **Soil Disturbance:** Large-scale grading and excavation for the new rail bed and the western wye connection near FM 2668 and FM 3057 will require robust erosion and sediment control plans to prevent downstream impacts.

LCRA appreciates the opportunity to participate in this preliminary consultation, and looks forward to reviewing the detailed environmental documents as they become available. If you have any questions or need additional information regarding this submittal, please contact me at 512.578.3385 or at patti.hershey@lcra.org.

Sincerely,



Patti Hershey
Senior Vice President, Environmental Affairs & Environmental Law