

October 19, 2018

Joshua Wayland
Surface Transportation Board
395 E. Street, SW
Washington, DC 20423-0001
Attn: STB Docket No. FD 36186

Dear Mr. Wayland,

The Rail Division of the Texas Department of Transportation received a letter on August 24, 2018 requesting preliminary environmental consultation for the proposed Texas Railway Exchange project in Galveston County. The Rail Division conducted a desktop review based on the project map that was included in the letter. The map indicates a project corridor running under State Highway 275/Harborside Drive and the Pelican Island Causeway. We understand that the project sponsor is developing alternative alignments within the project corridor.

The Rail Division maintains the Rail-Highway Operations Manual to define responsibilities and coordinate efforts required between railroad companies and other entities for projects that impact both roadway and railroad right-of-ways. The manual calls for the installation of crash walls on highway bridge columns within 25 feet of track centerlines and applying for a railroad spur permit if a new rail line will cross State right of way, outside of existing railroad right of way. Our records indicate that the Harborside Drive bridge was completed in 1982 and one or more columns are within 25' of existing tracks. It appears likely that any new alignment chosen for the Texas Railway Exchange project would also run within 25 feet of several highway bridge columns. The Rail Division expects that any new rail development would follow the Rail-Highway Operations Manual and include installation of safety features on the existing infrastructure in the project area to meet current standards. Please note you will need to meet with the American Railway Engineering and Maintenance-of-Way Association (AREMA) design criteria for vertical and horizontal clearances.

As of this time, we are not aware of any capacity improvement plans for the state bridge and do not object to the proposed project corridor. We are aware that the project may require permitting for wetlands impacts and assessments for other environmental features. The

Texas Department of Transportation has not reviewed environmental data at this time, but requests consultation as plans are further developed.

Thank you for the opportunity to comment on the project at this early juncture. Please contact us as the plan progresses.

Sincerely,

A handwritten signature in blue ink that reads "Peter D. Espy". The signature is written in a cursive, flowing style.

Peter D. Espy

Rail Division Director