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March 14, 2019

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

Dear Mr. Wayland,

The Rail Division of the Texas Department of Transportation (TxDOT) has reviewed and is providing written comment to the Draft Environmental Assessment (EA) for the proposal of Texas Railway Exchange, LLC (TREX). Rail Division staff conducted both a desktop review and a site inspection of the proposed project corridor. All proposed alignments have a rail corridor running under State Highway 275/Harborside Drive.

The Rail Division maintains the Rail-Highway Operations Manual to define responsibilities and coordinate efforts required between rail 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. Our records indicate that the Harborside Drive Bridge was completed in 1982 and one or more columns are within 25 feet of existing tracks. It appears likely that both proposed alignments would run within 25 feet of several highway bridge columns. As such, the Rail Division expects that any new rail development would follow the Rail-Highway Operations Manual and AREMA standards Chapter 8, Pier Protection and include installation of safety features on the existing infrastructure in the project area to meet current standards. The current Draft EA does indicate in Section 2.2 – Construction that crash walls will be installed, if necessary, at the existing piers supporting the City of Galveston owned 51st Street/Pelican Island Causeway in accordance with AREMA standards. *However, crash walls will also need to be installed under the State Highway 275/Harborside Drive Bridge for all piers within 25 feet of tracks.*

Rail Division staff do not have any objections to the proposed project corridors, and based on review of the Draft EA as well as a recent site inspection, would concur with the Office of Environmental Analysis's (OEA) finding of no significant impacts to the quality of the natural or human environment. We are aware that the potential project will require permitting for jurisdictional waters and wetlands of the U.S. and that at least one of the alignments will require an Individual Permit from the U.S. Army Corps of Engineers.

Thank you for the opportunity to comment on the Draft EA. We kindly ask that you continue to include TxDOT Rail Division in future correspondence as the project plans progress.

Sincerely,

Mark Werner, P.E.,
Rail Planning and Programming Section Director

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