



EI-3448

Texas Department of Transportation

DEWITT C. GREER STATE HIGHWAY BLDG. • 125 E. 11TH STREET • AUSTIN, TEXAS 78701-2483 • (512) 463-8585

December 12, 2007

Ms. Victoria Rutson
Chief, Section of Environmental Analysis
Surface Transportation Board
1925 K Street North West
Washington, D.C. 20423-0001

Dear Ms. Rutson:

The Texas Department of Transportation (TxDOT) has received notification of Liberty County Rural Rail Transportation District's (LCRRD) proposed application to the Surface Transportation Board (STB) to construct and operate a new rail line from near Dayton, Texas to Cleveland, Texas (STB Finance Docket No. 35061). We would like to offer comments on that proposed application and project.

TxDOT staff has evaluated a similar potential project as part of our Houston District freight study and is also aware that BNSF and Union Pacific (UP) railroads have both expressed interest in such a project. Our analysis determined that the project could connect UP's Lufkin Subdivision and BNSF's Conroe Subdivision (near Cleveland) to UP's Baytown Subdivision (south of Dayton). Our study determined that this proposed facility could enable the rerouting of through-freight trains operating between Beaumont (and/or other points east) and points west/northwest of Houston (such as Temple or Teague). The rerouting of such trains to the proposed alignment would eliminate their passage through the Houston terminal, which could free up capacity on existing rail lines, enhance movement on other existing corridors within the region, and provide benefits to the public in the form of reduced emissions from idling locomotives and vehicles at highway-rail grade crossings and provide added safety at the crossings. We believe the potential route could provide even greater benefits if it were equipped with Centralized Traffic Control signaling, passing sidings, set out tracks and a new switching yard to relocate some switching movements from within the Houston terminal. Based upon our research and the limited information available regarding LCRRD's proposed project, we believe that LCRRD's proposed construction can provide substantial benefits to both the public and railroad operations within the state if it is planned, constructed, operated, and managed appropriately. TxDOT is in the process of developing several highway projects that could be impacted by LCRRD's proposal. These include the SH 99 (Grand Parkway) project between US 59 and I-10 (east); a relief route (or "loop") from FM 1409 southwest of Dayton to the west and north around Dayton and around the north and east of Liberty terminating at FM 563 south of Liberty; the I-69/Trans-Texas Corridor; and a proposed grade separation of US 90 west of Dayton.

As Texas' transportation agency, TxDOT works with the Federal Highway Administration (FHWA) in a joint leadership role on transportation projects in the state. Due to the potential impacts LCRRD's proposal could have on existing and planned state road facilities, and TxDOT's designation by the Governor as the state agency responsible for rail planning and

coordination issues in Texas, we request that STB designate TxDOT as Joint Lead Agency, similar to our FHWA relationship, for all aspects of LCRRD's Application to Construct, including the National Environmental Policy Act process.

Thank you for the opportunity to comment on LCRRD's proposal. We look forward to hearing from you soon regarding our request for Joint Lead Agency status and to working with you in this process. If you have any questions regarding this matter, please contact James L. Randall at (512) 486-5003 or by email at jrandall@dot.state.tx.us.

Sincerely,



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Executive Director

cc: Mike Leary, Federal Highway Administration
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