



May 5, 2025
Via Electronic Submission

Andrea Poole, Surface Transportation Board, c/o VHB
Attention: Environmental Filing, Docket No. FD 36652
1001 G Street NW, Suite 1125
Washington, DC 20001

Dear Surface Transportation Board:

On behalf of the City of Eagle Pass, I am writing to formally express our opposition to the proposed Green Eagle Railroad project in Maverick County, Texas. After a thorough review of the Draft Environmental Impact Statement (EIS), the City has significant concerns regarding the project's potential impacts on the quality of life for our residents, the local economy, and the environment.

The City of Eagle Pass recognizes the importance of infrastructure development but believes that the Green Eagle Railroad, in its current proposed forms, would cause a range of negative consequences, many of which cannot be mitigated adequately or effectively. The following concerns outline the critical reasons for our opposition:

1. Noise Impacts

The operation of the Green Eagle Railroad would result in severe noise impacts on several residential receptors in Eagle Pass. Under both the Southern Rail and Northern Rail Alternatives, without the recommended mitigation measures, at least three to twelve receptors would experience noise levels above 65 Day-Night Average Noise Levels (DNL), which exceeds acceptable thresholds for community health and well-being. While mitigation measures such as noise barriers are proposed, they may not fully eliminate these severe impacts.

2. Roadway Capacity and Safety Impacts

The associated Commercial Motor Vehicle (CMV) Facility could adversely impact local roadways, especially at critical intersections like U.S. 277 and FM 1589. These intersections would operate at Level of Service (LOS) F, a severe congestion level, during peak traffic hours. The projected increase in traffic could result in 1.35 more crashes per year in the area, exacerbating existing safety concerns.

3. Land Use and Displacement

The construction of the Green Eagle Railroad would require significant rezoning of residential areas to industrial use, displacing both businesses and residences. These changes would disrupt the social and economic fabric of our community, especially for those who rely on the area for housing or livelihood. Additionally, the change in zoning will greatly

affect the current residential neighborhoods who will suffer from noise pollution, vibrations, air pollution, temperature changes, decreased property value, water pollution, and dangerous of hazardous material being transported in close proximity to their homes.

4. Visual Quality and Aesthetic Impacts

The visual intrusion of the proposed rail line and the 23-foot proposed mitigation wall, particularly under the Southern Rail Alternative, would dominate two key observation points, detracting from the natural beauty of our community. Though mitigation measures, such as the planting of native trees, are proposed, the scale of the rail line would still have lasting, negative effects on the aesthetic value of these areas. The proposed noise barriers and non-intrusive inspection facilities further exacerbate the visual impact.

5. Water Resources and Environmental Concerns

Construction of the proposed rail line would have significant environmental consequences, particularly for water quality in the Rio Grande River and Seco Creek. The Northern Rail Alternative poses a greater risk of water quality degradation due to the multiple crossings of Seco Creek and the potential for erosion from construction activities on the Mexican side of the border. These risks could have long-term effects on the local ecosystem and water resources. Notably, the Rio Grande River is the sole source of drinking water for the City of Eagle Pass, making any potential contamination a serious public health concern. The proposed route would result in the transport of hazardous materials north of the city's water intake point, increasing the risk of accidental spills or leaks that could compromise the water supply. This concern is amplified by the fact that Eagle Pass is currently experiencing a severe drought, which has already strained local water availability. Any disruption or contamination of the Rio Grande could further exacerbate water scarcity, threatening both human and environmental needs. In addition, increased sedimentation and runoff from construction zones may disrupt aquatic habitats, harm fish populations, and affect the availability of clean water for agricultural and municipal use. The removal of vegetation during the development phase could further exacerbate erosion and reduce the natural filtration capacity of the watershed. Mitigation strategies, strict environmental safeguards, and coordination with local water authorities will be essential to minimize the negative impacts on these critical and increasingly vulnerable water resources.

6. Biological Resources and Wildlife Impacts

The project would directly impact valuable scrub-shrub vegetation and pose a potential threat to endangered species such as the Texas Hornshell and Mexican Fawnsfoot. The disturbance of migratory bird habitats is also a concern. Although mitigation measures are recommended, including timing vegetation clearing outside nesting seasons and working with the U.S. Fish and Wildlife Service (USFWS), the risk of irreversible ecological harm remains significant.

7. Cultural and Historical Resources

The proposed rail line may potentially disturb culturally and historically significant areas, though no National Register-eligible properties have been identified in the EIS. Additional archaeological surveys are recommended, but we are concerned that important cultural resources may still be affected during construction.

8. Temporary Construction Emissions

Construction activities would generate temporary emissions of air pollutants and greenhouse gases, which would contribute to environmental degradation in the short term. Though the emissions are expected to fall below regulatory thresholds, they would still negatively impact air quality and the health of nearby residents during the construction phase.

9. Socioeconomic Impacts

The construction and potential redirection of commercial traffic to the proposed Puerto Verde International Bridge could have severe socioeconomic consequences for the City of Eagle Pass. The city relies heavily on its existing international bridges as a primary source of revenue, with tolls and associated commercial activity contributing significantly to its annual budget. If all commercial traffic is diverted to the Puerto Verde bridge, Eagle Pass stands to lose an estimated \$15.5 million in the first year alone. Such a substantial financial loss would have immediate and lasting impacts on the city's ability to fund essential services, infrastructure maintenance, and public safety operations. The economic vulnerability of Eagle Pass was clearly demonstrated during the COVID-19 pandemic, when the temporary closure of its international bridge forced the city to furlough employees due to lost revenue. A permanent or large-scale redirection of traffic could replicate or even worsen these effects, leading to job losses, reduced municipal services, and broader economic instability.

In conclusion, the City of Eagle Pass firmly believes that the negative impacts far outweigh any perceived advantages. We respectfully urge the Surface Transportation Board to reject the current proposal or to mandate significant changes to mitigate the adverse effects on our community, environment, and local infrastructure.

Thank you for your attention to these important concerns. We look forward to your careful consideration and to continuing the dialogue on this critical issue.

Sincerely,



Homero Balderas
City Manager