



OFFICE OF THE COMMISSIONER
UNITED STATES SECTION

INTERNATIONAL BOUNDARY AND WATER COMMISSION
UNITED STATES AND MEXICO

April 16, 2025

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

Dear Ms. Poole:

The United States Section, International Boundary and Water Commission (USIBWC) has reviewed the Surface Transportation Board (Board)'s March 14, 2025 Draft Environmental Impact Statement (EIS) for Green Eagle Railroad Eagle Pass and Maverick County, Texas, Docket No. FD 36652. USIBWC provides the following comments on the Draft EIS in accordance with the National Environmental Policy Act (NEPA).

In December 2023, the Green Eagle Railroad, LLC (GER), owned by Puerto Verde Holdings (PVH), requested authority from the Board to construct and operate approximately 1.3 miles of new double-tracked railroad line in Maverick County, Texas. The project includes construction of a new rail bridge and new roadway bridge over the Rio Grande into Mexico. The proposed rail line would be part of an international commercial transportation corridor proposed by PVH, the Puerto Verde Global Trade Bridge project, consisting, in addition to the proposed line, of a new border crossing for commercial motor vehicles (associated CMV Facility) between Piedras Negras, Coahuila, Mexico, and Eagle Pass, Texas. Only the proposed line requires licensing authority from the Board. However, GER and PVH intend to construct and operate the proposed line and the associated CMV Facility, respectively, as a single port of entry for freight rail and CMV traffic between the United States and Mexico; therefore, the Draft EIS considered the entire project. The inspection facilities would be coordinated with and likely transferred to U.S. Customs and Border Protection (CBP) and/or the General Services Administration.

The Draft EIS Section 3.11.1.2 Floodplains discusses IBWC's role and authority under the 1944 and 1970 treaties. The 100-year baseflood elevation (BFE) used in the Draft EIS has the bridge and embankment 14.5 feet above the BFE. Pursuant to Article 8 of the Presidential Permit issued May 2024, the proponent GER will be required to obtain concurrence from IBWC for the design of the bridge over the Rio Grande, including as noted in Section 3.11.1.2, providing more detailed design plans and hydrologic and hydraulic modeling. The proponent should coordinate with USIBWC Realty Chief John Claudio (Email: john.claudio@ibwc.gov) for Article 8 concurrence.

USIBWC does not have any additional comments on the Draft EIS, which appears adequate and includes wetland delineation, listed species impacts determinations, discussion of potential spills

into the Rio Grande, and mitigation measures such as noise impact reduction. The Draft EIS incorporated USIBWC scoping comments from January 2024.

Please continue to keep USIBWC on the distribution list for this project. Contact Ms. Elizabeth Verdecchia, Natural Resources Specialist, Environmental Management Division, at (915) 832-4701 for any questions or comments.

Sincerely,



Gilbert G. Anaya, Ph.D.

Division Chief

Environmental Management Division