



January 5, 2023

Office of Environmental Analysis
Andrea Poole
Surface Transportation Board
Docket No. FD 36652
395 E. Street SW
Washington, DC 20423

RE: Response to Docket No. FD 36652, Green Eagle Railroad—Construction and Operation Exemption—Line of Railroad in Maverick County, Texas; Preliminary Consultation

Dear Danielle Gosselin:

The City of Eagle Pass (hereinafter referred to as “City”) currently operates two international bridges, and a rail line already exists, all of which are underutilized and undercrowded. At the moment, our community is suffering an immigration crisis where in a moment’s notice, our international bridges can easily be closed for lack of Customs and Border Protection (CBP) staff to manage the bridge because they are busy dealing with the border crisis. Only one of the two bridges is open twenty-four hours a day, seven days a week. The current inspection station for commercial traffic hours of operation is limited to Monday-Friday 8:00am-11:00pm, Saturday & Sunday 8:00am-3:00pm, it is difficult to believe CBP will open an inspection station for a new bridge that is ran nonstop, given their staff shortage caused by the immigration crisis. The same operational challenges exists with the Mexican Customs with their limited staff and hours.

ABSENCE OF “EXISTING CONGESTION AT THE CURRENT BORDER CROSSING”

The current commercial capacity at the Port of Eagle Pass (Camino Real International Bridge) is under fifty percent (50%), the Port of Eagle Pass has an estimated capacity of supporting 25000 commercial trucks under its existing infrastructure. To date, 850-900 trucks are processed per day. In a proactive measure to ensure the growth of our international bridge, the City of Eagle Pass has made considerable investments to improve and expand the Port of Eagle Pass.

The Camino Real International Bridge Access Expansion and Realignment Project will improve the efficiency of commercial trucks by separating commercial truck and passenger vehicles as commercial trucks exit the Port and enter the United States. The project will also double the crossing lanes on the Bridge from the current six lanes to twelve, ensuring an expedited crossing. The realignment project has been approved, funded with the effort of Congressman Gonzalez, and is currently being finalized. The exp

The International Bridge Toll System Upgrade project is the installation of a state-of-the-art toll system that will bring free flow toll tags for all commercial crossings, further accelerating their crossing.

GREEN EAGLE RAILROAD AND PUENTE VERDE INTERNATIONAL BRIDGE WOULD HAVE A PROFOUND NEGATIVE INFLUENCE ON POPULATION, GROWTH, HIGH-DENSITY URBANIZATION, INDUSTRIAL EXPANSION, RESOURCE EXPLOITATION, AND NEW AND EXPANDING TECHNOLOGICAL ADVANCES AND WOULD NEGATIVELY IMPACT THE IMPORTANCE OF RESTORING AND MAINTAINING ENVIRONMENTAL QUALITY.

The proposed development of a railroad and commercial transportation corridor via an international bridge near the Rio Grande poses several challenges and opportunities for the local community and environment. The project would require careful assessment and planning to ensure that the water and sewer systems, the utility infrastructure, and the stormwater management systems can support the increased demand and activity without compromising the quality of the of the Rio Grande River, the only water source for our community, and the current infrastructures.

There are concerns over the projected development's potential effect on the environment because it includes more power generating facilities. The concerns include which types of energy sources will be used, potential emissions and adherence to environmental regulations to minimize any adverse effect on the air and water quality near residential areas and waterways. An assessment on the power supply would be required to prevent overloads and ensure a stable power supply.

The proposed rail line is located in the back yard of neighborhoods and noise and air pollution are a concern for the citizens of those neighborhoods.

The proposed rail transportation project in Maverick County poses several challenges and risks for the safety and security of the residents and the wildlife in the area. The City of Eagle Pass, which is growing at a rate of 7% or 2,000 citizens per year, needs to consider the potential impacts of the construction and operation of the rail lines and the bridge facility, especially regarding the transportation of hazardous materials and the response of law enforcement in case of a major incident. The location of the rail line and international bridge is outside of the city limits and Maverick County Sheriff's Department would be the law enforcement agency responsible for that area. The Maverick County Sheriff's Department is already stretched to its base and may not have the resources or the vision to handle the increased demands of the project. Moreover, the project will disrupt the natural habitat of the wildlife in the area, forcing them to co-exist with the human population and creating problems for the Eagle Pass Police Department, which also handles the Animal Control Unit. The project should be thoroughly studied and evaluated before any plans for construction are initiated, as the security and safety of the residents and the wildlife are the priority.

GREEN EAGLE RAILROAD AND PUERTO VERDE INTERNATIONAL BRIDGE FAILS TO ASSURE A SAFE, HEALTHFUL, PRODUCTIVE, ESTHETICALLY, AND CULTURALLY PLEASING SURROUNDINGS FOR ALL AMERICANS.

The Green Eagle Railroad and Puerto Verde International Bridge project is a major transportation corridor that connects the United States and Mexico. The project poses several security and environmental challenges that need to be addressed before it can be implemented. Given the international nature of the corridor, security measures such as surveillance and monitoring systems would be crucial to ensure the safety of both the development and the surrounding residential areas. The planned fencing, video surveillance and security patrols along the rail line may also have potential effects on nearby ecosystems, such as wildlife habitats, water quality, and vegetation. Moreover, the project would involve the construction of sturdy, well-maintained, and adequately secured fencing along the rail line to prevent unauthorized access, especially near residential areas. However, fencing near residential areas should also be aesthetically pleasing and in harmony with the surrounding environment. Fencing should not negatively impact property values or community aesthetics. Furthermore, the project would require ongoing maintenance of the fencing to address wear and tear, prevent breaches, and respond promptly to any security or safety issues. These issues raise questions about the feasibility, cost-effectiveness, and sustainability of the project.

The Green Eagle Railroad and Puerto Verde International Bridge project also raises serious concerns about the safety and well-being of the citizens residing in the target area of construction. Maverick County Law Enforcement is not in sync with the citizens ratio to population and therefore the County may not be ready for such a project. County Law Enforcement may not be prepared to provide its citizens the required safety measurements. Emergency response routes and plans should be required before commencing construction including emergency, fire and hazard response.

Moreover, the area in question will be built in the Hopedale Subdivision which is known as one of the most beautiful rural areas in our community with farmland and high-priced homes. Esthetically the industrial construction, and future commercial international bridge that leads out to the entrance of this subdivision would destroy the appeal and value of the homes in this area. The potential impacts on the local community, such as disruptions to daily life and damage to residential properties, would be a significant concern, as these projects could affect the quality of life and well-being of the residents.

THE GREEN EAGLE RAIL LINE AND PUERTO VERDE INTERNATIONAL BRIDGE WILL IMPOSE DETRIMENTAL EFFECTS ON REGIONAL AND LOCAL TRANSPORTATION SYSTEMS AND PATTERNS

The proposed Green Eagle Rail Line is to cross Del Rio Blvd, a five-lane high traffic road. This road is the only road that serves as an entrance and exit from the North of our city to Highway 277. The construction of railroad lines, bridges, and roadways could increase traffic congestion and alter traffic flows in the area. This road that the proposed rail line would be passing over, is a

roadway owned by the Texas Department of Transportation who would have to conduct a series of studies, and designate alternative traffic routes before construction.

If the Puerto Verde Bridge is open to commercial vehicles, this will cause a massive increase of commercial traffic on Veterans Boulevard, a highly trafficked boulevard with residential areas nearby, affecting the normal commuting of the residents.

The projected increase in transportation activity could also strain the existing road infrastructure, imposing upgrades, or maintenance. The impact on existing transportation routes could affect the accessibility and mobility of both residential and commercial areas, raising concerns about the design, capacity, and maintenance costs of these roads and bridges. Additionally, safety measures, such as traffic controls, signalization, and signage, would need to be in place to minimize the risk of accidents.

The potential disruptions to local transportation systems would need to be assessed and addressed, especially in the event of a flood. The vulnerability of critical infrastructure, such as roads, bridges, and utilities, to flooding is a major concern, as these elements are essential for community functionality and safety. The placement of structures on the Rio Grande River makes them susceptible to extreme weather or flood events, which could compromise their functionality and safety.

THE GREEN EAGLE RAIL LINE AND PUERTO VERDE INTERNATIONAL BRIDGE WILL IMPEDE ON PRIME AGRICULTURAL LAND

The proposed International Bridge is to be located on current prime agricultural land. Development of this magnitude along a FEMA floodplain will require a thorough stormwater management plan to ensure it can handle heavy rainfall and prevent flooding, safeguarding both the development and surrounding residential areas. The development may alter natural water flow patterns and increase the risk of flooding, requiring comprehensive floodplain management strategies to safeguard both the development and nearby residential areas.

THE GREEN EAGLE RAIL LINE AND PUERTO VERDE INTERNATIONAL BRIDGE WILL CAUSE A SIGNIFICANT INCREASE IN NOISE LEVEL DECIBELS

One of the potential environmental impacts of the proposed development project is noise pollution. The initial construction phase, the proposed rail line, and commercial roadway will generate significant noise, impacting the quality of life for residents in the vicinity. The estimated decibels of a train horn are approximately 110 dBs, the residents in this area are used to a calm, and quiet neighborhood and did not purchase their properties with the knowledge of a rail line to be developed in their backyards. The City of Eagle Pass has already closed two rail intersections of the current rail line to mitigate the noise complaints of residents in the area, the proposed rail line would provoke new noise complaints and the County may not have the resources to address them. Additionally, noise generated by construction and operational activities near waterways could have detrimental effects on aquatic ecosystems, such as disturbing fish migration or breeding patterns.

THE GREEN EAGLE RAIL LINE AND PUERTO VERDE INTERNATIONAL BRIDGE WILL HAVE A DETRIMENTAL EFFECT ON PUBLIC HEALTH REGARDING WATER POLLUTION, AIR POLLUTION, FLOODING AND PUBLIC SAFETY.

Another potential environmental impact of the proposed development project is water pollution. Proximity to waterways leading to the Rio Grande River raises concerns about potential water pollution from construction activities, operations processes, or accidental chemical spills affecting the river ecosystem. Adequate measures would need to be in place to protect water quality, such as using best management practices, spill prevention and response plans, and erosion and sediment control plans. Impact on stormwater runoff needs careful consideration as well. If not properly managed, stormwater can pick up pollutants from roads and construction sites and transport them into local water bodies, affecting water quality and aquatic ecosystems. Potential disturbances of riverbed sediments are key concerns, as they may release contaminants or alter the habitat of aquatic organisms. Inspection stations and operation facilities may introduce additional risk due to improper containment and management of radiation portal monitors, which could pose a threat to human and environmental health.

Currently, hazardous waste sites do not exist anywhere near the proposed project site. The City of Eagle Pass Fire Department services both City and County and would be the responsibility entity, along with the Emergency Operations Center to respond to hazardous spill, at this moment with the migrant crisis in our community, the Fire Department is overworked.

The potential disruptions to local transportation systems would need to be assessed and addressed, especially in the event of a flood. The vulnerability of critical infrastructure, such as roads, bridges, and utilities, to flooding is a major concern, as these elements are essential for community functionality and safety. The placement of structures on the Rio Grande River makes them susceptible to extreme weather or flood events, which could compromise their functionality and safety.

The proposed development project may have significant effects on the communities to be traversed by the line, including impacts on essential public services, public roads, and adjoining properties. The project may result in a potential influx of new residents or workers associated with the development, which may strain local community services such as schools, healthcare facilities, and emergency services. The project may raise possible concerns about traffic flow, particularly near schools. Transportation plans should be in place to minimize disruptions during peak school hours, and safety measures, such as crosswalks and traffic signals, should be considered. Additionally, the project may have a potential impact on school bus routes and bus stops. Large freight vehicles could necessitate adjustments to ensure the safety of students traveling to and from school. Furthermore, specialized healthcare facilities, equipped to handle potential accidents or spills in water bodies, may need to be considered to ensure the safety of both the environment and the community. Access to healthcare services for residents may be affected by the development, given that our community is already a medically underserved community. The project would also require consideration of public facilities such as parking, access roads, and service infrastructure. The possible introduction of hazardous materials through rail transportation would need proper

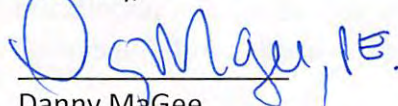
emergency response planning, adequate access to the proposed rail and roadway for quick response to potential incidents, and coordination with local public safety agencies to prevent disruptions and contamination. Adequate emergency response infrastructure, including fire stations and medical facilities, should be in place to address potential accidents or emergencies associated with the rail and roadway activities. Finally, an approved emergency evacuation plan, a flood warning system, clear communication strategies, and a development design to ensure resident safety in case of an incident involving construction, flooding, or hazardous materials should be established.

ENVIRONMENTAL JUSTICE

Based on information available, the proposed project will have significant detrimental financial effects for the City of Eagle Pass. The City relies heavily on revenues generated through tolls on the City's two international bridges. As a border community, these resources are used to offset the higher public safety costs necessary to meet the demands of cross border traffic. The proposed project is projected to result short- term revenue losses of \$4.5 million to \$6 million annually or approximately 17% of the City's operating budget.

The City will be required to make drastic cuts to city services and to eliminate, at a minimum, 75 full-time positions, including at a minimum 30 police officer and firefighter/EMT positions. The City of Eagle Pass provides fire and EMS services to all Maverick County, including the Kickapoo Traditional Tribe of Texas, and emergency medical service call response times will be significantly impacted. Low-income residents living in distant colonies and tribal residents will be most affected by delayed response times to emergency calls.

Sincerely,



Danny MaGee
City Engineer
City of Eagle Pass