



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

April 2, 2024

Justin J. Marks
Clark Hill PLC
1001 Pennsylvania Avenue, NW
Suite 1300 South
Washington, DC 20004

Re: Docket No. FD 36652, Green Eagle Railroad – Construction and Operation
Exemption – Line of Railroad in Maverick County, Texas; **Information Request
No. 1**

Dear Mr. Marks:

Consistent with 40 C.F.R. § 1506.5(b)(1), the Surface Transportation Board's (Board) Office of Environmental Analysis (OEA) requests the information detailed below, which is needed to support the Environmental Impact Statement (EIS) for the above-referenced proceeding.

As you are aware, on December 14, 2023, Green Eagle Railroad, LLC (GER), a subsidiary of Puerto Verde Holdings (PVH), filed a petition under 49 U.S.C. § 10502 with the Board for authority to construct and operate approximately 1.3 miles of new common carrier rail line (the Line) in Maverick County, Texas. The Line would extend from the United States/Mexico border to the existing Union Pacific Railroad (UP) line at approximately UP milepost 31. The Line would be part of a larger project proposed by PVH, the Puerto Verde Global Trade Bridge (PVGTB Project), consisting of a new trade corridor for freight rail and commercial motor vehicles between Piedras Negras, Coahuila, Mexico, and Eagle Pass, Texas, and an approximately 1.3-mile roadway and other infrastructure in the United States. Only the Line requires licensing authority from the Board.

Separately from the Board's final decision on whether to authorize the Line, the proposed new bridges (one for the Line and one for commercial motor vehicles) across the Rio Grande River would require permits from the U.S. Coast Guard (USCG) and the U.S. Army Corps of Engineers (USACE). USCG will participate as a Cooperating Agency in the EIS process. In these circumstances, the first portion of this information request addresses the Line. The second portion addresses the other components of the PVGTB Project.

The Line

Construction

1. Would construction of the Line result in any temporary disturbance outside the right-of-way (ROW)?
2. How many construction workers would be required to construct the Line?
3. Provide a description of any physical structures that would be installed in the Line's ROW, including access roads, staging areas, communication towers, siding tracks, etc. Please provide cross sections for any such structures.
4. Provide a plan exhibit and geographic information system (GIS) file showing the location of all fencing that would secure the Line.
5. Provide a map and GIS file showing the location of all proposed property acquisitions, including residences and businesses that the Line would displace.
6. Provide a more detailed written description of the Construction Plan described in Chapter 7 of the Presidential Permit Application that would apply to the Line. The detailed plan should include the duration of work in months and phases of the proposed construction activity. This should correlate with question 7 below. Additionally, provide an updated, more detailed, and readable (higher resolution) Gantt Chart Schedule (PDF format is acceptable), as shown in Exhibit 7.1 of the Presidential Permit Application.
7. Provide an estimate of the proposed construction equipment likely to be used to construct the Line. This estimate should include construction equipment per activity (e.g. earthwork, site preparation, excavation, foundations, superstructure, fit-out), including quantity of equipment, horsepower, fuel type, daily utilization rate (percentage), and operating working hours by month/quarter. See Attachment 1 example table and choose one of the examples to submit. Include an estimate of the duration of earthwork activities (hours of earth work by month/quarter, similar to equipment hours). See examples in Attachment 1.

Rail Operations

1. What would the operating hours be for rail operations on the Line?

2. Provide the number of trains per day (total, and in each direction) that would use the Line based on projections five years after the date of the anticipated year of the issuance of a final decision from the Board.¹
3. Provide the anticipated average train speed on the Line.

Other Parts of the proposed PVGTB Project

Construction

1. Would construction of the other parts of the proposed PVGTB Project result in any temporary disturbance outside the permanent limits of disturbance? For example, please provide any known information on planned utility easements, laydown and storage areas, and construction access roads.
2. Provide a plan exhibit and GIS file showing the location of all fencing that would secure the other parts of the PVGTB Project.
3. How many construction workers would be required to construct the other parts of the PVGTB Project?
4. Provide a more detailed written description of the Construction Plan for the other parts of the proposed PVGTB Project described in Chapter 7 of the Presidential Permit Application. The detailed description should include the duration of work in months and phases of the proposed construction activity. This should correlate with question 5 below. Additionally, provide an updated, more detailed, and readable (higher resolution) Gantt Chart Schedule (PDF format is acceptable), as shown in Exhibit 7.1 of the Presidential Permit Application.
5. Provide an estimate of the proposed construction equipment likely to be used during construction of the other parts of the PVGTB Project. This should include an estimate for proposed construction equipment per activity (e.g. earthwork, site preparation, excavation, foundations, superstructure, fit-out), including quantity of equipment, horsepower, fuel type, daily utilization rate (percentage), operating working hours by month/quarter. See Attachment 1 example table and choose one of the examples to submit. Additionally, include an estimate of the duration of earthwork activities (hours of earth work by month/quarter, similar to equipment hours). See examples in Attachment 1.

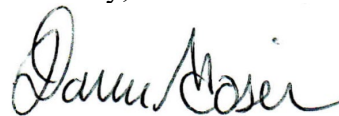
¹ For example, if OEA issues a Final EIS in Q4 2025, the Board's final decision would likely be issued in 2026. Therefore, the forecast year for Proposed Action-related rail traffic should be 2031.

Operations

1. What would the operating hours be for the proposed rail and commercial vehicle inspection facilities? The Presidential Permit Application indicates that the planned PVGTB Project will offer 24/7 processing for Customs-Trade Partnership Against Terrorism or Free and Secure Trade-compliant commercial vehicles but does not appear to provide hours for inspection of other commercial vehicles.
2. Provide the expected average commercial vehicle idling delay time (delay per vehicle in minutes or seconds per vehicle) at the proposed commercial vehicle inspection facilities. Exhibit 3.10 of the Presidential Permit Application appears to provide that information, but the resolution of the figure makes it illegible.
3. Provide an estimate of the number of workers needed to operate the proposed commercial vehicle inspection facilities.
4. Provide information on lighting that would be associated with the other parts of the PVGTB project. Specifically,
 - a. Describe the location of lighting that would be used for construction and operations of the other parts of the PVGTB Project.
 - b. Describe the proposed lighting types (e.g., fixed lighting, flashing safety lights, etc.).
 - c. Describe whether the proposed lighting would be full cut off light fixtures, i.e., downward facing.

Please provide your response as soon as possible and no later than April 26, 2024. If you have any questions, please contact Andrea Poole of my staff at 202-934-3330. Thank you for your assistance in this matter.

Sincerely,



Danielle Gosselin
Director
Office of Environmental Analysis

Attachment

						Quantity of Equipment in Use per Quarter											
			Operating Activity Information			Year 1				Year 2				Year 3			
Construction Equipment	Fuel Type	Rated HP	Average Days/Week	Average hrs/day	Time Utilization Factor	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
<u>Phase -Excavation</u>																	
Dump truck	Diesel	600	5	8	60%	4	4	4	4	2	2	-	-	-	-	-	-
Backhoe	Diesel	450	5	8	45%	3	3	3	3	2	2	-	-	-	-	-	-
Bulldozer	Diesel	400	5	8	50%	2	2	2	2	1	1	-	-	-	-	-	-
Compressor	Electric	100	5	8	90%	1	1	1	1	1	1	-	-	-	-	-	-
etc...																	
<u>Phase 2</u>																	
Equipment 1	xxx	xxx	xxx	xxx	xx%	-	-	-	xx	xx	xx	xx	-	-	-	-	-
Equipment 2	xxx	xxx	xxx	xxx	xx%	-	-	-	xx	xx	xx	xx	-	-	-	-	-
Equipment 3	xxx	xxx	xxx	xxx	xx%	-	-	-	xx	xx	xx	xx	-	-	-	-	-
<u>Phase 3</u>																	
Equipment 1	xxx	xxx	xxx	xxx	xx%	-	-	-	-	-	-	xx	xx	xx	xx	-	-
Equipment 2	xxx	xxx	xxx	xxx	xx%	-	-	-	-	-	-	xx	xx	xx	xx	-	-
Equipment 3	xxx	xxx	xxx	xxx	xx%	-	-	-	-	-	-	xx	xx	xx	xx	-	-

						Work Hours of Earthwork per Quarter											
						Year 1				Year 2				Year 3			
						Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Duration of Earth Work	-	-	-	-	-	2480	2480	2480	1240	1240	-	-	-	-	-	-	-

Example Construction Air Quality Table (Version 2)- Use if operating activity (hrs/day, days/week) changes by quarter but quantities of equipment is relatively constant for each piece of equipment.

					Working hours of Equipment in Use per Quarter											
					Year 1				Year 2				Year 3			
Construction Equipment	Fuel Type	Rated HP	Average Quantity	Time Utilization Factor	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
<i>Phase -Excavation</i>																
Dump truck	Diesel	600	6	60%	2520	2520	2520	2520	1260	1260	-	-	-	-	-	-
Backhoe	Diesel	450	2	45%	2520	2520	2520	2520	1260	1260	-	-	-	-	-	-
Bulldozer	Diesel	400	2	50%	2520	2520	2520	2520	1260	1260	-	-	-	-	-	-
Compressor	Electric	100	2	90%	2520	2520	2520	2520	1260	1260	-	-	-	-	-	-
<i>etc...</i>																
<i>Phase 2</i>																
Equipment 1	xxx	xxx	xxx	xx%	-	-	-	xx	xx	xx	xx	-	-	-	-	-
Equipment 2	xxx	xxx	xxx	xx%	-	-	-	xx	xx	xx	xx	-	-	-	-	-
Equipment 3	xxx	xxx	xxx	xx%	-	-	-	xx	xx	xx	xx	-	-	-	-	-
<i>Phase 3</i>																
Equipment 1	xxx	xxx	xxx	xx%	-	-	-	-	-	-	xx	xx	xx	xx	-	-
Equipment 2	xxx	xxx	xxx	xx%	-	-	-	-	-	-	xx	xx	xx	xx	-	-
Equipment 3	xxx	xxx	xxx	xx%	-	-	-	-	-	-	xx	xx	xx	xx	-	-

					Work Hours of Earthwork per Quarter											
					Year 1				Year 2				Year 3			
					Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Duration of Earth Work	-	-	-	-	2480	2480	2480	1240	1240	-	-	-	-	-	-	-