



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

July 10, 2025

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

By email at jmarks@clarkhill.com

RE: Docket No. FD 36847, Laredo Gateway Industrial Railway, LLC – Construction and Operation Exemption – Line of Railroad in Webb County, Texas

Dear Mr. Marks:

Thank you for your March 31, 2025 letter regarding Laredo Gateway Industrial Railway, LLC's (LGIR) proposal to construct approximately 13,850 feet of new rail line (the Line) in Webb County, Texas. LGIR is seeking authority from the Surface Transportation Board (Board) to construct the Line and has entered into an agreement with Iron Horse Resources, Inc. (IHR) to operate the Line after it is constructed. According to your letter, a waiver of the requirements of 49 C.F.R. § 1105.6(a), which generally provides for the preparation of an Environmental Impact Statement (EIS) for rail line construction proposals, should be granted because the proposed project is limited in scope and an Environmental Assessment (EA) is the appropriate level of environmental review for the project.

Pursuant to 49 C.F.R. § 1105.6(d), the Board's Office of Environmental Analysis (OEA) is granting your request. Based on the information available to date, OEA believes the potential environmental impacts would not be significant, and any impacts could most likely be addressed through appropriate mitigation measures. OEA has determined that the preparation of an EA is appropriate in this case for the following reasons:

1. OEA conducted preliminary agency and tribal consultation and requested formal comments by June 23, 2025 during which minimal concerns regarding the Line were raised from relevant agencies and tribes.
2. OEA visited the project area on May 19th and 20th, 2025 to understand the existing conditions. The Line is located within an undeveloped area with no adjacent commercial or residential development. Therefore, it is unlikely to adversely affect sensitive noise or vibration receptors.

3. Because the area is principally used for cattle grazing, the potential for adverse impacts to listed species is low. The federally listed ashy dogweed (*Thymophylla tephroleuca*) was not observed during the site visit.
4. The Line would only extend 13,850 feet and would not involve the addition of any new roadway/rail at-grade crossings. Therefore, it would be unlikely to result in any impacts related to vehicular or pedestrian safety and delay.
5. OEA understands that on average only approximately one train per day is expected to move on the Line. Due to the small volume of expected rail traffic, the potential for impacts related to air quality and safety during rail operations is expected to be low.

OEA will prepare a Draft EA and make the document available for public review and comment. OEA will then prepare a Final EA that responds to the substantive comments received on the Draft EA and include any appropriate modifications to its existing analysis or additional analysis. The Final EA will also set forth OEA's final recommended mitigation measures to the Board. The Board will then consider the entire environmental record, including the Draft EA, all comments received on the Draft EA, and the Final EA, when making its final decision in this proceeding. However, should the EA process disclose unanticipated impacts that are significant and unable to be mitigated, OEA would require the preparation of an EIS at that time.

If we can be of further assistance, please feel free to contact Andrea Poole of my staff at 202-934-3330 or by email at Andrea.Poole@stb.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Danielle Gosselin".

Danielle Gosselin
Director
Office of Environmental Analysis