

August 8, 2025

Jay C. Johnson

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Danielle Gosselin
Adam Assenza
Office of Environmental Analysis
Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Re: Docket No. FD 36633, Plaquemines Port Harbor and Terminal District
– New Orleans and Gulf Coast Railway Mainline Extension – in
Plaquemines Parish, LA

Dear Ms. Gosselin and Mr. Assenza:

Thank you for your patience and hard work as the Plaquemines Port Harbor and Terminal District (“PPHTD”) team moves to resume the environmental review of the proposed New Orleans and Gulf Coast Railway Mainline project (“NOGC Mainline Extension Project”).

I am writing because the Board’s current rules “normally” require an environmental impact statement (“EIS”) for new rail construction. 49 C.F.R. § 1105.6(a). But those same rules also allow an applicant to request an environmental assessment (“EA”) instead. *Id.* § 1105.6(d). For the reasons that follow, PPHTD believes that its NOGC Mainline Extension Project is unlikely to have any significant, unmitigable environmental effects and that an EA will satisfy the Board’s obligations under the National Environmental Policy Act.

PPHTD is a public corporation and political subdivision of the State of Louisiana that is governed by the Plaquemines Parish Commission Council. PPHTD’s territorial jurisdiction includes all of Plaquemines Parish, making it one of the nation’s largest seaports. Within that jurisdiction, PPHTD’s vision is to be the leading international gateway port in the Gulf, helping existing customers continue to grow and attracting new business partners using bigger ships from Asia, South America, and Europe.

The NOGC Mainline Extension Project is a proposed 10-mile rail extension in Plaquemines Parish, Louisiana. The rail extension would start at the current end of

the existing NOGC line and run to the future site of a 200-acre container terminal facility known as the Louisiana Gateway Container Terminal. The project area for the project thus stretches from Ironton, Louisiana in the north to Woodland, Louisiana in the south. The updated Information Paper that PPHTD is submitting today describes in more detail the project's purpose and need, potential route options, and numerous benefits of the NOGC Mainline Extension Project.

The area in which the project will be built has long been used for industrial purposes, including by an old rail line that ran along the same basic route that PPHTD is now proposing. PPHTD's project will result in new rail traffic, but it will also remove from local roads truck traffic that would otherwise carry cargo from the Louisiana Gateway Container Terminal. PPHTD expects new rail traffic in the range of 2–3 trains per week, which does not exceed the threshold of 8 trips per day for an attainment area (as Plaquemines Parish is) under 49 C.F.R. § 1105.7(e)(5)(i)(C).

New rail traffic will cause some noise. But because the NOGC Mainline Extension Project site is in an industrial area, this noise should not affect any sensitive noise receptors. Indeed, there are few, if any, residences that will experience significant noise from the proposed rail line. This is especially true now that PPHTD is proposing a minor modification in the project's original route that will take the rail line farther away from the Ironton community, the only place along the route where people live. PPHTD has also started outreach to community members to make sure that any impacts are mitigated.

Because the proposed rail line largely parallels Highway 23, the route is not pristine. Any impacts to water resources, wetlands, and biological resources will thus be minimal, and PPHTD will mitigate any such impacts as required by state and federal law. Nor does PPHTD have any reason to think that the proposed rail line is likely to adversely affect endangered or threatened species or areas designated as a critical habitat. No such areas are apparent on the National ESA Critical Habitat Mapper.

Impacts to other resource areas usually included in the Board's environmental reviews are expected to be nonexistent. Because the project crosses just one, little-used road, it should not have any negative effects on transportation systems or traffic safety. And because the project is in an industrial area zoned by PPHTD, no land use effects are expected. PPHTD anticipates that these resources would require minimal discussion in an EA.

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Finally, while PPHTD knows of no historic resources that may be impacted by the proposed rail line it will work with your office and the Louisiana State Historic Preservation Office to identify any such potential impacts. PPHTD is prepared to mitigate any concerns that may arise.

In short, the environmental conditions of this area are reasonably well known, and the impacts of the NOGC Mainline Extension Project are not expected to be significant. Beyond that, the U.S. Supreme Court's decision in *Seven County Infrastructure Coalition v. Eagle County*, should free the Board to focus on those effects that are within its jurisdiction. PPHTD thus asks that OEA forgo preparation of an EIS under 49 C.F.R. § 1105.6(a) and review the proposed rail line using an EA.

We look forward to continuing the work on this project. In the meantime, please let me know if you have any questions.

Sincerely,



Jay C. Johnson