



OFFICE OF THE COUNTY JUDGE
THE HONORABLE RAMSEY ENGLISH CANTÚ

January 16, 2024

Andra Poole
Project Manager, Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, DC 20024

RE: Green Eagle Railroad, LLC- Construction and Operation of a Line of Railroad in Maverick County,
TX- Surface Transportation Board Finance Docket 36652

Dear Ms. Poole:

I am responding to the Notification and Request for Comment that I received from the Surface Transportation Board's Office of Environmental Analysis (OEA) related to the petition for construction and operation exemption filed by the Green Eagle Railroad (GER). The GER proposal is an element of a larger project proposed by Puerto Verde Holdings (PVH) to develop a new trade corridor between the U.S. and Mexico via a newly constructed bridge, the Puerto Verde Global Trade Bridge (PVGTB), for commodities transported via rail and commercial motor vehicles. Maverick County appreciates that OEA is leading the environmental review for this important project.

Maverick County is a Texas County that was created in 1856 and organized in 1871. It is located in the southwestern portion of Texas along the Rio Grande. Our county seat is the City of Eagle Pass. In my position as Maverick County Judge, I am elected by the voters of Maverick County to chair the County Commissioners' Court- the legislative body responsible for the governance of Maverick County. Prior to this position, I served as a City Councilman, Mayor Pro-Temp & Mayor of the City of Eagle Pass for a total of 15 years.

Maverick County has an interest in the proposed PVH trade corridor encompassing the GER rail line, the PVGTB, and associated elements of the proposal because under Texas state law Maverick County is granted the authority to establish, maintain, and operate international toll bridges connecting to Mexico within its jurisdiction. Maverick County is currently home to three international bridges, all located in downtown Eagle Pass. The City of Eagle Pass owns and operates two vehicular and pedestrian bridges, and the Union Pacific Railroad owns and operates a single tract railroad bridge.

On July 7, 2023, Maverick County Commissioners' Court issued a resolution to endorse the PVGTB and serve as its primary sponsor for the PVH Presidential Permit Application that U.S. law requires for the construction of a new cross-border bridge. Maverick County supports the GER proposed line and the PVGTB because of growth and economic opportunities presented by cross border trade. According to the Texas Department of Transportation Border Transportation Master Plan, the existing border infrastructure is inadequate to meet the projected demand for the transportation of goods across the Texas-Mexico border by 2050.

Maverick County further supports this project because of the potential for improved border security. As a border community Maverick County has unique challenges not experienced by other communities in the U.S. The proposed GER rail line and the PVH trade corridor, as proposed, would be completely secured via fencing with surveillance, monitoring, and patrolling to significantly reduce the potential for unauthorized human transport or movement of illicit materials over the border.

1. The proposed GER rail line and the PVH trade corridor project will be an economic generator for Maverick County including Eagle Pass.

Maverick County is a rural county with a population of 57,887 per the 2020 Census where 95% of its residents are Hispanic, the third highest percentage for any county in the continental U.S. Maverick County is one of the poorest counties in Texas and the United States. Our per capita income is \$19,908, approximately half the U.S. average with a poverty rate of 20.5%, approximately double the U.S. average. The subject projects will help add money, jobs and serve to improve the quality of life for many presently under poverty level.

We anticipate that construction and operation of the proposed trade corridor encompassing the PVGTB, the proposed GER rail line, and the other associated elements of the trade corridor will benefit our county through employment growth and increased tax revenue. As stated in the PVH Presidential Permit (submitted as Exhibit B to the GER petition for exemption), we believe that development of the PVH trade corridor has the potential to create a new North American reshoring hub in Maverick County. According to the economic study accompanying the PVH Presidential Permit, the PVH trade corridor could create 127,000 local jobs.

Further, new business activity has the potential to increase annual local tax receipts by nearly \$488 million. As the PVH Presidential Permit illustrates, Maverick County, the City of Eagle Pass, the Eagle Pass Independent School District, and the Maverick County Hospital District will all potentially benefit from the GER proposed line and associated development. Construction of the project could generate \$41.9 million for the City of Eagle Pass and \$61 million for Maverick County/Special District. Operations of the new trade corridor has the potential to generate \$102.8 million in tax receipts for the City of Eagle Pass and \$145.3 million per year for Maverick County/ Special District.

The Maverick County Commissioners' Court will be able to utilize any tax revenue associated with the development of the GER proposed line and the trade corridor for the betterment of our citizens, whether that is investing in improved civil infrastructure, our law enforcement and first responders or other needs of our Maverick County government.

2. Maverick County commissioned a feasibility study in 2019 for a new port of entry and its initial findings found no obvious environmental or engineering problems in the area studied.

Although Maverick County is a vocal proponent of the GER proposed line and the PVH trade corridor project, we understand that it is important for OEA to take a hard look in accordance with the Board's obligations under the National Environmental Protection Act.

Speaking on behalf of the Maverick County Commissioners' Court, I have no specific environmental concerns to raise with OEA. I am confident that any impacts to the environment that are determined to exist will be mitigated. This view is formed by a feasibility study commissioned by Maverick County in 2019 to study a new bridge to accommodate future growth at our county's ports of entry.

The 2019 feasibility study evaluated a new commercial motor vehicle port of entry in Maverick County, and it did not study all of the same project elements presented in the GER Petition for Exemption. However, the study found that "after reviewing the environmental and engineering constraints, there appear to be no 'fatal flaws' with the Study Area that would prohibit the construction of a new POE within this location." While the 2019 study is only a preliminary analysis, its conclusion does not raise any immediate concerns regarding the impact of the GER proposed line and the PVH trade corridor.

The 2019 feasibility study is included as Appendix D of the PVH Presidential Permit that is attached as Exhibit B of the GER Petition for Exemption.

3. Maverick County is eager to realize the environmental benefits that will occur as a result of the GER Proposed Line and the PVH trade corridor project to route rail and truck traffic around the City of Eagle Pass.

Maverick County understands that the proposed GER rail line and the PVH trade corridor may have impacts on the environment and these impacts may require mitigation. However, on the other side of the equation is the environmental benefits of the proposed GER rail line and the PVH trade corridor. Maverick County believes that these benefits should also be considered as part of OEA's environmental analysis.

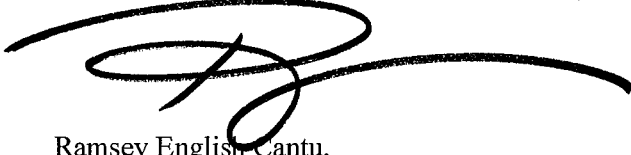
This project- if completed as envisioned- will result in a rail and commercial motor vehicle bypassing the heavier City of Eagle Pass. Maverick County residents will benefit from the reduced risk of traffic accidents, exposure to pollutants, and risks associated with at-grade rail crossings.

The proposed GER Line is designed to have non-at-grade crossings and if utilized by both Union Pacific Railroad and BNSF Railway, Inc., would also eliminate nine at grade crossing in downtown Eagle Pass. The removal of these grade crossing would improve mobility for Maverick County residents and emergency services. In addition, the elimination of grade crossing would result in lower decibel train operations by eliminating the need for train horns. The noise related to train horns has been a complaint among Eagle Pass residents that the proposed GER rail line could alleviate.

Another environmental benefit for Maverick County is the proposed bypass for commercial motor vehicles crossing the border thereby routing truck traffic out of the City of Eagle Pass. The trade corridor would also reduce delays for northbound trucks crossing the border, making the border more efficient and reducing air emissions. By creating a more efficient commercial motor vehicle crossing, the PVH trade corridor can alleviate the anticipated commercial motor vehicle wait times that are anticipated by 2050. This in turn would eliminate 100 million pounds of annual CO2 emissions from idling trucks.

In conclusion, Maverick County is appreciative of OEA for its work to determine what environmental impacts, if any, may result due to the development of this project. As stated, Maverick County supports the proposed GER rail line and the PVH trade corridor because we see an opportunity for economic development in our community that will also provide environmental benefits for our county.

In public service, I remain,

A handwritten signature in black ink, featuring a large, stylized 'R' and 'C' that are interconnected, with a long horizontal stroke extending to the right.

Ramsey English Cantu,
Maverick County Judge