



November 4, 2024

U.S. General Services Administration
Attention: Karla Carmichael, NEPA Program Manager
819 Taylor St, Room 12-B
Fort Worth, TX 76102

Delivered via electronic mail

Re: BOTA LPOE Draft EIS

To Whom it May Concern:

On behalf of the public and private sector members of the Border Trade Alliance, we are writing to formally express our concerns with the General Services Administration's recommendation to remove commercial truck traffic from the Bridge of the Americas (BOTA) in El Paso, Texas as part of the proposed modernization project. While BTA appreciates the effort to comply with the National Environmental Policy Act and to address social, economic, and environmental impacts through the Environmental Impact Statement (EIS), we believe that eliminating commercial traffic at BOTA would create significant, adverse impacts on trade and commerce in the region.

Impact on freight costs

Eliminating commercial truck traffic from BOTA would drive freight onto tolled international bridges, creating upward pressure on shipping costs for firms on both sides of the border. BOTA's toll-free access offers a crucial cost advantage for cross-border commerce that many businesses in the region rely on. The removal of this option could disproportionately burden small to medium-sized enterprises, threatening economic stability and the competitiveness of U.S.-Mexico trade in this region.

Increased congestion at other ports of entry

BTA is concerned that removing commercial cargo traffic from BOTA would result in a diversion of freight to other international bridges, creating additional congestion and delays at these locations. The redirection of trucks to alternative ports not originally designed for increased freight volume could negatively impact both commercial efficiency and the region's air quality by increasing emissions due to slower traffic and idling times.

Supply chain disruptions

BOTA is a critical link in the cross-border supply chain, and the elimination of commercial traffic at this port would disrupt well-established trade routes and schedules. The resulting delays and logistical challenges would add considerable uncertainty to supply chains, which could have a cascading negative economic impact on industries across the region.

Lack of engagement with local stakeholders

The BTA is particularly concerned about the apparent lack of a robust stakeholder engagement process involving the local business community. A comprehensive decision-making process should include meaningful consultation with those directly affected, particularly business owners, freight operators, and logistics professionals. Including these stakeholders ensures that the proposed alternatives serve the region's long-term economic interests.

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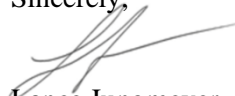
Coordination with Mexican authorities

Additionally, the proposed changes require close coordination with Mexican authorities, whose cooperation is critical to smooth and efficient binational trade operations. The absence of a transparent, coordinated effort risks implementing changes that could create operational inconsistencies and potentially compromise cross-border efficiencies.

With these significant concerns in mind, BTA urges GSA to reconsider its preferred alternative, Alternative 4, and to re-evaluate the impacts that the elimination of commercial truck traffic at BOTA would have on the regional economy, supply chains, and local stakeholders. We encourage GSA to select an alternative that maintains commercial truck access at BOTA and incorporates a more inclusive, stakeholder-driven planning process.

Thank you for your attention to these concerns. We look forward to a continued dialogue with GSA on this matter and would welcome the opportunity to discuss further the consequences of eliminating commercial traffic at BOTA.

Sincerely,



Lance Jungmeyer
Chairman
Border Trade Alliance



Britton Mullen
President
Border Trade Alliance