U.S. - MEXICO BORDER MAYORS ASSOCIATION | ASOCIACIÓN DE ALCALDES FRONTERIZOS MÉXICO-E.U.

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November 3, 2025

Submitted Electronically via USTR Comments Portal

The Honorable Jamieson Greer
United States Trade Representative
Office of the United States Trade Representative
600 17th Street NW
Washington, DC 20508

Re: Request for Comments on the Operation of the Agreement between the United States of America, the United Mexican States, and Canada (Docket ID USTR-2025-0004)

Dear Ambassador Greer,

On behalf of the U.S.-Mexico Border Mayors Association (USMBMA), we submit this comment regarding the operation of the United States-Mexico-Canada Agreement (USMCA) as it approaches its joint review in 2026.

The USMBMA represents mayors and local governments from both sides of the U.S.-Mexico border, encompassing over 14 million residents and some of the most dynamic binational trade corridors in North America. In 2024, U.S.-Mexico trade exceeded $800 billion, with approximately 40% transiting through our border communities. Our region is at the nexus of trade, labor, infrastructure, and environmental provisions of the USMCA, and we are uniquely positioned to assess its operational effectiveness.

This comment reflects the collective input of border mayors following our recent convening, "Binational Voices: A Mayors' Dialogue on the Future of the Border," held in Mexico City on October 6, 2025, and reaffirms our shared commitment to shaping policies that reflect the lived realities of border communities.

We urge the Office of the United States Trade Representative (USTR) to maintain a trilateral agreement between the United States, Mexico, and Canada, as this approach has best served our regional economic vitality and has created one of the strongest trading blocs in the world for more than three decades. Below are recommendations that we feel would best enhance and create improved economic opportunities for our border region and its incredible potential economic growth.

1. Modernization of Ports of Entry

Efficient, modern ports of entry are the foundation of the USMCA's success. Border cities and counties directly experience the impacts of delays, outdated infrastructure, and staffing shortages that constrain trade, increase logistics costs by an estimated 15-20%, degrade regional air quality, and undermine the agreement's competitive advantages.

Recommendations:

- **Establish a USMCA Infrastructure Fund**: Create a dedicated funding mechanism with contributions from all three countries, specifically for continued investment in infrastructure and technology.
- **Implement 24/7 Operations**: Expand all commercial ports of entry to full 24-hour operations within three years, with coordinated staffing commitments from both countries.
- **Accelerate Technology Deployment**: Deploy non-intrusive inspection technology, biometric processing, and AI-enabled risk assessment systems at all major commercial crossings by 2027.
- **Create Binational Infrastructure Councils**: Establish joint U.S.-Mexico planning bodies for each major port of entry corridor to coordinate expansion projects, prioritize investments, and align timelines.
- **Expand Trusted Trader Programs**: Increase enrollment in the Free And Secure Trade (FAST) program, the Customs Trade Partnership Against Terrorism (C-TPAT) program, and equivalent Mexican programs by 50% through reduced administrative barriers and enhanced incentives.
- **Develop Performance Metrics**: Establish transparent, publicly reported wait-time and throughput targets for each port of entry, with quarterly reviews and accountability mechanisms.

2. Cross-Border Environmental Collaboration

Environmental challenges are inherently binational. Border communities bear the disproportionate costs of pollution, wastewater overflows, and air emissions that do not recognize international boundaries. Vehicle idling at congested ports generates significant greenhouse gas emissions and particulate matter that directly impacts the health of border residents.

Recommendations:

- **Revitalize the Border 2025 Program**: Launch a successor Border 2030 environmental framework with dedicated funding of at least $200 million annually, equally contributed by all three nations.
- **Address Transboundary Water Infrastructure**: Prioritize completion of long-delayed wastewater treatment projects, including the expansion of treatment capacity in the Tijuana River Valley, Ciudad Juárez-El Paso corridor, and the Nogales region.
- **Establish Border Air Quality Monitoring Network**: Deploy a comprehensive, trinational network of air quality sensors at all major ports of entry, with real-time data sharing and public access.
- **Create Green Lanes**: Incentivize and prioritize low-emission commercial vehicles through expedited processing, reduced fees, and dedicated crossing lanes at all ports of entry.

- **Support Just Transition Initiatives**: Provide technical and financial assistance to border manufacturers transitioning to cleaner production methods in accordance with USMCA labor and environmental standards.

- **Mandate Environmental Impact Assessments**: Require trinational environmental review for all major port expansion or new crossing projects, with meaningful community and stakeholder input.

3. Improved and Integrated Logistics

Exports from the United States rely on expedited, predictable delivery and cost control. It is important to strengthen and expand on improvements achieved since USMCA took place. The agreement has contributed to streamlining cross-border operations, trucking networks, and the digitalization of processes which further facilitate bilateral trade and investment.

We recommend the following actions:

- **Streamline Processes:** Continue to streamline customs procedures, including a single manifest and aligning U.S., Mexico, and Canadian customs classification and document procedures under a unified approach to reduce redundant data entry and inspections.
- **Expand Data Sharing:** Increase data sharing across agencies to reduce delays.
- **Build and Improve Technical Capacity:** Implement comprehensive, ongoing customs training to ensure that personnel have the technical expertise to ensure efficient processing.

4. A Unified Strategy for Local Government Engagement

Border mayors are on the front lines of implementing the USMCA's economic, social, and environmental dimensions. However, local governments frequently operate without formal mechanisms for engagement in trade-related planning, implementation, or dispute resolution processes.

Recommendations:

- **Create a USMCA Border Mayors Council**: Establish an official advisory body composed of border mayors from all three countries, with formal consultation rights and direct reporting channels to the Free Trade Commission.
- **Include Local Governments in Working Groups**: Mandate local government representation in all USMCA committees addressing issues with direct border impacts, including the Environment Committee, Labor Affairs Committee, and Customs and Trade Facilitation Committee.
- **Establish Regional Economic Development Zones**: Designate border regions as special USMCA implementation zones with enhanced technical assistance, coordinated economic development resources, and streamlined access to federal programs.
- **Fund Trinational Metropolitan Planning**: Provide dedicated resources for joint planning efforts by sister cities, particularly for transportation, land use, and infrastructure coordination, especially in border communities that are responsible for the highest volume in trade of goods and services.
- **Create a Border Impact Assessment Requirement**: Require federal agencies to assess and report on the border community impacts of proposed USMCA-related regulations before implementation.

- **Support Capacity Building**: Provide training, technical assistance, and information resources to help local governments effectively engage with USMCA provisions and opportunities.

5. Labor and Workforce Development Coordination

The USMCA's strengthened labor provisions create opportunities to enhance working conditions throughout North America, but require coordinated implementation that engages local stakeholders.

Recommendations:

- **Establish Cross-Border Workforce Development Initiatives**: Create joint training programs that recognize certifications across borders and support supply chain workforce needs.
- **Support Local Labor Enforcement**: Provide resources and training to help local authorities identify and address labor violations that undermine USMCA standards.
- **Enhance Worker Voice Mechanisms**: Create accessible channels for workers in all three countries to report labor concerns, with protections against retaliation.

6. Supply Chain Resilience and Regional Content

Recent global disruptions have highlighted the strategic value of North American supply chain integration and the USMCA's role in promoting regional production.

Recommendations:

- **Strengthen Regional Supply Chain Mapping**: Develop comprehensive, shared databases identifying critical supply chain components and vulnerabilities across all three countries.
- **Facilitate Nearshoring at Border Regions**: Create targeted programs that encourage companies to locate production facilities in border areas, leveraging existing infrastructure and labor markets.
- **Simplify Rules of Origin Administration**: Streamline documentation and verification processes, particularly for small and medium-sized enterprises (SMEs).
- **Support SME Participation**: Establish technical assistance centers in border communities to help small businesses navigate USMCA provisions and access new market opportunities in all three countries.
- **Support SME Employee Training**: Expand employee training programs for SME employers in order to build more technical capacity, enhance economic outcomes, and sustain talent in border communities.

Conclusion

The strength of the USMCA lies in its ability to connect national policy to local reality. Border cities represent the vital connective tissue of North American economic integration, where policy becomes practice, where commerce becomes community prosperity, and where binational cooperation becomes daily lived experience.

Our communities have demonstrated resilience and adaptability in implementing this agreement under challenging circumstances. Now, as the USMCA enters its review period, we urge all three countries to

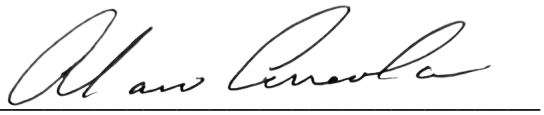
make border infrastructure investment, environmental protection, and local government engagement central pillars of the agreement's next chapter.

Border cities are ready to serve as active, formal partners in shaping a more efficient, sustainable, and inclusive cross-border economy. We urge our federal counterparts to make local voices a permanent and institutionalized part of that process.

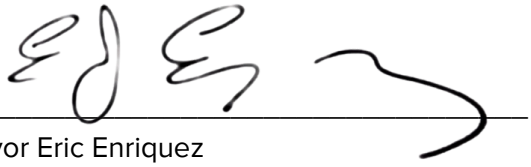
The U.S.-Mexico Border Mayors Association stands ready to work collaboratively with USTR, our Mexican and Canadian counterparts, and all stakeholders to ensure the USMCA delivers on its promise for the people and communities at the heart of North American trade.

Respectfully,
The U.S.-Mexico Border Mayors Association

Mayors



Mayor Alvaro “Al” Arreola Sr.
Del Rio, Texas



Mayor Eric Enriquez
Las Cruces, New Mexico



Mayor Ramiro Garza Jr.
Edinburg, Texas



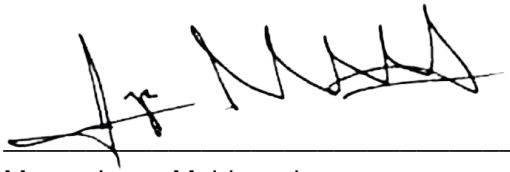
Mayor Todd Gloria
San Diego, California



Mayor Norie González Garza
Mission, Texas



Mayor Renard Johnson
El Paso, Texas



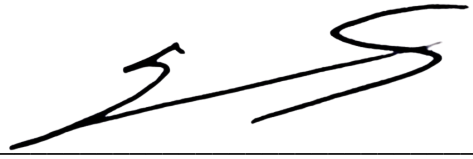
Mayor Jorge Maldonado
Nogales, Arizona



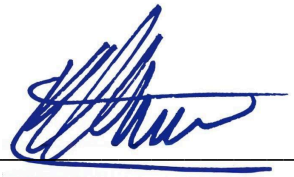
Mayor John McCann
Chula Vista, California



Mayor Cruz Pérez Cuellar
Ciudad Juárez, Chihuahua



Mayor Jacobo Rodríguez
Piedras Negras, Coahuila



Mayor Dr. Victor D. Treviño
Laredo, Texas

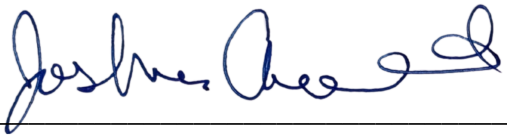


Mayor Aaron Valdez
Eagle Pass, Texas

Government Leaders



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County Commissioner for Precinct 2
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Joshua Acevedo, Ed.D.
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El Paso, Texas

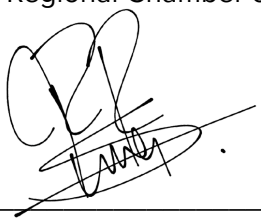
Partner Organizations



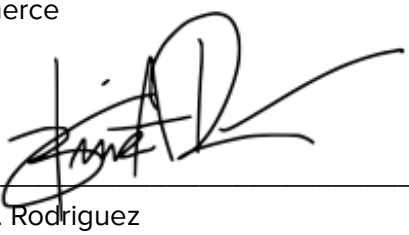
Chris Cate
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Rob Elias
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