

## **RECORD OF DECISION**

### **FINAL ENVIRONMENTAL IMPACT STATEMENT**

**for the**

**Alcan Land Port of Entry**

**Expansion and Modernization**

**Alcan, Alaska**

**October 2024**

#### **ACTION**

The U.S. General Services Administration (GSA) published a Final Environmental Impact Statement (EIS) for the Alcan Land Port of Entry (LPOE) Expansion and Modernization project in Alcan, Alaska. GSA is the lead agency for the Final EIS, and the Native Village of Northway (Northway) is a cooperating agency. The Final EIS describes the purpose and need for the project; alternatives considered; the existing environment that could be affected; the potential impacts resulting from each alternative; and proposed mitigation measures. In accordance with the Final EIS, GSA selects Alternative 1, Expansion and Modernization in Place, as its preferred alternative. This Record of Decision (ROD) documents the specific components and rationale for GSA's decision. This decision is based on the Final EIS issued in September 2024; associated technical reports; comments from federal and state agencies, stakeholders, members of the public, and elected officials; and other resources contained in the administrative record. The Final EIS is available on the project website at: <https://www.gsa.gov/alcan>.

Comments received during the Final EIS 30-day waiting period are provided in Attachment 1 to the ROD, and GSA's responses and revisions made to the Final EIS in response to those comments are provided in the Errata Sheet attached to the ROD (Attachment 2).

#### **BACKGROUND**

The Alcan LPOE is located at Milepost (MP) 1221.8 on the Alaska Highway, 0.43 miles from the United States (U.S.) / Canada Border. This facility operates year-round in sub-arctic weather conditions and is the only 24-hour LPOE serving personal vehicles and commercial traffic between the Yukon Territory, Canada, and mainland Alaska. U.S. Customs and Border Protection (CBP) currently processes privately-owned vehicles (POVs), commercial vehicles, and buses at the Alcan LPOE. The Alcan LPOE is owned by GSA and operated by CBP. Construction of the current Alcan LPOE was completed in 1972, with no major additions occurring since its original construction.

GSA's Public Buildings Service (PBS) assists federal agency customers housed in GSA facilities with their current and future workplace needs based on their specific mission requirements. CBP's mission is to safeguard America's borders thereby protecting the public from dangerous people and materials while enhancing the nation's global economic competitiveness by enabling legitimate trade and travel.

## **PURPOSE AND NEED**

The purpose of the project is to provide an updated LPOE to support CBP's mission. Accomplishing this purpose will increase operational efficiency, effectiveness, security, sustainability, safety, and comfort for cross-border travelers and federal employees at the Alcan LPOE.

The project is needed to update the current facilities which are over 50 years old. Buildings within the inspection facility cannot effectively support CBP infrastructure, enforcement operations, public and employee safety, and housing needs. Updated security initiatives require increased capacity and new inspection technology to be installed and implemented. There is not a dedicated firing range on site, and CBP personnel must travel to Fairbanks, Alaska, for weapons training and qualification. In addition, installation of energy and water conservation measures, security system updates, safety improvements, and replacement of housing units are needed across the Alcan LPOE to meet the resource efficiency, safety, and comfort standards of CBP. The current layout of inspection areas does not allow for optimal traffic flow, which can cause congestion and delays in processing times.

## **PROJECT ALTERNATIVES EVALUATED**

GSA identified one action alternative that meets the stated purpose and need of the proposed project and thus was analyzed in the Final EIS. Per Council of Environmental Quality (CEQ) regulations, GSA also analyzed a "No Action" alternative, which evaluates the effects that would occur if GSA continued to operate the LPOE under current conditions (i.e., the status quo). GSA has decided to implement Alternative 1: Expansion and Modernization in Place.

### **Alternative 1: Expansion and Modernization in Place**

Under Alternative 1, the existing LPOE site will be expanded and modernized. Alternative 1 will include:

- Use of up to 6.5 acres from Tetlin National Wildlife Refuge (NWR);
- Site preparation and grading;
- Construction and operation of a new Main LPOE Building;
- Addition of enclosed inspection spaces for commercial vehicles and POVs;
- Construction of new housing units with adequate separation from LPOE operations;
- Implementation of security measures for the LPOE housing complex;
- Construction of an indoor firing range and a helicopter landing zone; and
- Demolition of existing LPOE structures.

Based on CBP and GSA design standards, the total enclosed building area required for the modernized Alcan LPOE and housing will be 129,145 square feet (sf) with an additional 3,820 sf of booths and canopies and 3,600 sf of outdoor parking and hard surfaces.

Alternative 1 will provide dual-purpose inspection lanes to allow for flexibility of inspection operations as well as enclosed spaces for secondary inspection of POVs and commercial vehicles. A modernized Main LPOE Building will also enhance interview capabilities to meet current CBP security standards. The

updated residential campus will be separated from LPOE operations to minimize risk to resident personnel and their families. Two of the three existing wastewater lagoons will remain in place. GSA and CBP will finalize the layout of the modernized LPOE through the Project Development Study process during the design phase of the project. GSA will obtain a permit or other agreement for the helicopter landing zone from the U.S. Fish and Wildlife Service (USFWS) for use of up to 6.5 acres of Airs Hill south of the LPOE.

All facility and infrastructure improvements proposed under Alternative 1 will incorporate a sustainable, climate-resilient, cyber-secure, and operationally efficient design. GSA will seek to meet or exceed energy and sustainability goals established by federal guidelines and policies, along with industry standard building codes and best practices.

The Alcan LPOE modernization will seek to achieve Leadership in Energy and Environmental Design (LEED®) certification at the highest feasible level within reasonable cost. The modernized facilities will be net zero ready. Renewable energy sources will be planned for future installation and provided with minimum infrastructure to accommodate the energy source (e.g., photovoltaics, geothermal), if GSA decides to install such infrastructure.

There will be approximately 15 acres of temporary ground disturbance and 5 acres of permanent ground disturbance, with approximately 15 acres of vegetation removed. Approximately 5 acres will be used for staging; the location is yet to be determined. Following completion of the expansion and modernization project, there will be 12 acres of impervious surfaces at the project site, an increase of 4 acres from current conditions.

Following is an overview of the measures included in the planned facility expansion and modernization.

### ***Site Expansion***

Under Alternative 1, GSA will acquire a use permit or develop an agreement with the USFWS for use of up to 6.5 acres of a previously-disturbed area of Airs Hill as a helicopter landing zone.

### ***Site Preparation***

Under Alternative 1, an approximately 14,400 square-foot-area of previously disturbed land on Airs Hill will be cleared, graded, and compacted for use as a helicopter landing zone, which will facilitate safer helicopter inspections in a dedicated area. In addition, Alternative 1 will improve the existing hillside access road with safety features such as new guardrails on the hill's steep sections. No blasting is planned for the hillside south of the existing LPOE. Blasting will only occur, where necessary, for foundations or buried utilities on existing GSA property.

### ***Facility Construction and Renovation***

Under Alternative 1, the following facilities will be constructed:

- Main LPOE Building (20,615 sf);
- Inspection Booths and Canopies (3,820 sf);
- Outdoor Parking (3,600 sf);

- Indoor Firing Range (7,126 sf);
- Employee Housing (49,080 sf); and
- Recreation Building (4,494 sf).

Additional detail about each facility can be found in the Final EIS. All newly constructed structures other than the firing range and employee housing will be connected to the existing maintenance utilidor. The following facilities and infrastructure will be renovated and modernized:

- Service Building and Storage (13,623 sf); and
- Existing Main LPOE Building (7,954 sf).

### ***Demolition, Disposal, and Relocation of Existing Structures***

Under Alternative 1, all existing housing units, recreation, and support buildings will be demolished and disposed. GSA will comply with net zero waste disposal guidelines to the maximum extent possible. The existing aboveground storage tanks (ASTs) and underground storage tanks (USTs) will also be demolished and disposed of using licensed contractors and all proper closure procedures. A new fuel AST will be installed adjacent to the Utility Building. Depending on the utility plans developed during the project design phase, the Utility Building may also house batteries and panels associated with the photovoltaic system.

### ***Construction Phasing and Duration***

Given the seasonal constraints of construction work in Alaska, Alternative 1 will likely follow a 6-year timeline with three phases: site preparation, facility construction and renovation, and building switch-over. All new construction will use modular or off-site construction to the extent possible due to the limited construction season, remote nature of the site, and availability of modular construction manufacturers in Alaska. Construction crews will be stationed in temporary housing near the facility to reduce commute times to the remote location.

### **No Action Alternative**

The No Action Alternative assumes that no construction or renovations to the existing Alcan LPOE would occur. Minor repairs would occur as needed, and maintenance and operation of the existing facilities would continue. This alternative would not meet the purpose and need of the project as the expansion and modernization of existing facilities to address deficiencies of the Alcan LPOE would not occur.

## **ENVIRONMENTAL CONSEQUENCES**

Resources analyzed in the Final EIS included land use; geology, topography, and soils; water resources; biological resources; cultural and tribal resources; environmental justice (EJ); socioeconomics; recreation; visual resources; noise and vibrations; solid and hazardous waste and materials; and climate change. Based on the analysis presented in the Final EIS for Alternative 1 and the No Action Alternative, both adverse and beneficial effects range from negligible to moderate.

Table 1 summarizes the potential effects of the alternatives on each resource analyzed; refer to the Final EIS for further details.

**Table 1. Alternatives and Potential Effects**

Resource	Alternative 1	No Action Alternative
Land Use	<p>Beneficial, direct, local, long-term, negligible effects on the suitability of land to support the current use.</p> <p>Adverse, direct, local, long-term, minor effects to the Tetlin NWR resource area.</p>	No effects to land use.
Geology, Topography, and Soils	<p>Adverse, direct, local, long-term, negligible effects to geology.</p> <p>Adverse, direct, site-specific, long-term, minor effects on topography.</p> <p>Adverse, direct, local, short- and long-term, moderate effects on soils. No effects on permafrost.</p>	<p>No effects to geology and topography.</p> <p>Adverse, direct, site-specific, long-term, negligible effects to soils.</p>
Water Resources	Adverse, direct, local, short- and long-term, negligible to minor effects to stormwater and surface waters.	Adverse, direct, local, long-term, negligible effects to water resources.
Biological Resources	<p>Adverse and beneficial, direct, local, short- and long-term, negligible effects to vegetation.</p> <p>Adverse, direct, local, short- and long-term, negligible effects to wildlife and migratory birds.</p>	Adverse, direct, local, long-term, negligible effects to wildlife.
Cultural and Tribal Resources	<p>Adverse, direct and indirect, local, short-term, minor effects on the Alaska Military Highway Telephone and Telegraph Line.</p> <p>Adverse or beneficial, direct, local, long-term, negligible effects to archaeological resources.</p> <p>Adverse, direct, local, short- and long-term, minor effects on subsistence activities.</p>	Adverse, direct, local, long-term, moderate effects on tribal resources.
Environmental Justice	Beneficial, direct, regional, short-term, moderate effects on job creation and local vendors.	Adverse, direct, local, long-term, moderate effects on subsistence activities.

Resource	Alternative 1	No Action Alternative
	<p>Adverse, direct, local, short and long-term, moderate effects on subsistence activities.</p> <p>Adverse, indirect, regional, long-term, moderate effects on Native Alaskan communities.</p> <p>Adverse, direct, local, short-term, minor effects to the health and safety of children.</p>	<p>Adverse, indirect, regional, long-term, moderate effects on Native Alaskan communities.</p>
Socioeconomics	<p>Adverse, direct, regional, short-term, negligible effects on population and housing.</p> <p>Beneficial, indirect, regional, short-term, moderate effects on local materials and workers.</p> <p>Beneficial, indirect, regional, short-term, minor effects on unemployment rates.</p> <p>Beneficial, direct, regional, long-term, negligible effects on trade.</p>	<p>Adverse, indirect, local, long-term, negligible effects on population and housing.</p> <p>No effects to the economy or trade.</p>
Recreation	<p>Adverse, direct, local, short- and long-term, negligible to minor effects on the accessibility and quality of recreational resources.</p> <p>Beneficial, direct, local, long-term, minor effects on the accessibility of the Airs Hill Trailhead.</p>	<p>Adverse, direct, local, long-term, negligible effects on recreation.</p>
Visual Resources	<p>Adverse, direct, local, short- and long-term, minor effects to visual resources.</p>	<p>Adverse, direct, local, long-term, negligible effects to visual resources.</p>
Noise and Vibrations	<p>Adverse, direct, local, short- and long-term, negligible to minor effects from noise.</p> <p>Adverse, direct, local, short-term, moderate effects from blasting noise and vibrations.</p>	<p>Adverse, direct, local, long-term, negligible effects from noise.</p>
Solid and Hazardous Waste and Materials	<p>Adverse, direct, local, short- and long-term, negligible effects from solid and hazardous waste and materials.</p>	<p>Adverse, direct, local, long-term, negligible effects from solid and hazardous waste and materials.</p>

Resource	Alternative 1	No Action Alternative
	Beneficial, direct, site-specific, long-term, minor effects on fuel leaks and spills.	
Climate Change	<p>Adverse and beneficial, direct, regional, short- and long-term, negligible effects to climate change.</p> <p>Adverse, direct, regional, long-term, moderate effects on the LPOE from climate change.</p>	<p>Adverse, direct, regional, long-term, negligible effects to climate change.</p> <p>Adverse, direct, regional, long-term, moderate effects on the LPOE from climate change.</p>

GSA has developed an Inadvertent Discovery of Cultural Resources Plan to mitigate adverse effects in the event archaeological resources are discovered during project activities. Effects to archaeological resources would be adverse or beneficial depending on the effects of ground-disturbing activities on the integrity of the resource. If a discovery is made, GSA will coordinate with the SHPO, Northway, and the Tanana Chiefs Conference to minimize any potential adverse effects resulting from an inadvertent discovery

GSA also evaluated potential cumulative effects to the affected resources in the action area based on past, present, and foreseeable future activities. Recent major actions in the vicinity of the Alcan LPOE are associated with the resurfacing and rehabilitation of a portion of the Alaska Highway. Current and foreseeable major future actions in the vicinity of the Alcan LPOE (i.e., within 25 miles) are associated with the continuation of two State-led resurfacing and rehabilitation projects affecting the Alaska Highway.

The Alaska Highway resurfacing and rehabilitation construction activities are anticipated to have the following short- and long-term effects: 1) fuel consumption during material transport from the construction site, between the plant and the site, and the construction operations themselves; 2) exhaust and particulate emissions generated during construction; and 3) traffic, congestion, and noise emissions generated during construction. GSA considered the magnitude of cumulative effects and concluded that the contributing adverse cumulative effects from Alternative 1 and the No Action Alternative would either have no effect or be negligible or minor on all resources, except cultural resources and EJ due to restrictions to traditional fishing areas.

### **MITIGATION MEASURES AND BEST MANAGEMENT PRACTICES**

Under Alternative 1, GSA commits to the mitigation measures and best management practices (BMPs) as outlined below:

#### **Geology, Topography, and Soils**

- BMPs to address potential geologic hazards including radon-resistant construction techniques to prevent radon pervasion into facilities such as using gravel as gas permeable layer located below the foundation; a gas and vapor barrier between gravel and foundation; a vent pipe from the gravel; and thorough sealing and caulking of foundation itself.

- GSA's Seismic Mitigation Program will be followed to ensure seismic preparedness.
- Alaska Construction General Permit will be required to satisfy the National Pollution Discharge Elimination System (NPDES) program. Development of a Stormwater Pollution Prevention Plan (SWPPP) to document the BMPs to be used to control soil erosion and sedimentation including installing silt fencing and sediment traps, and reestablishing vegetation to minimize erosion and sedimentation.
- Revegetation around the buildings, parking lots, and other infrastructure where soils remain exposed after project activities with regionally appropriate native plant species.
- BMPs to prevent impacts to permafrost from earthwork activities include constructing insulated foundations.

### **Water Resources**

- BMPs will be implemented in accordance with the Alaska Construction General Permit, which establishes limits on pollutant discharges, monitoring and reporting requirements, and other provisions to minimize potential discharges and impacts to water quality.
- Development of a SWPPP to document the BMPs to be used on the construction site to reduce or prevent the discharge of pollutants.
- BMPs to prevent or mitigate the escape of sediment and manage or mitigate risk of spills include erosion control strategies during project activities that often include temporary seeding, use of silt fencing, installation of gravel construction entrances/exits, installation of temporary sediment basins, and other methods as determined during detailed design. Drop cloths, proper storage of chemicals, and immediate treatment of spill areas with absorbents and soil removal will be used to mitigate potential spills.
- Permanent stormwater BMPs, such as detention ponds, vegetated swales, or level spreaders, will be installed in compliance with local, state, and federal law.
- BMPs will be regularly maintained by mowing, removing debris, and repairing damage.

### **Biological Resources**

- BMPs to minimize introduction and establishment of invasive species include equipment washing; proper disposal of invasive species found during project activities; construction vehicles will use existing roadways to access the project area to avoid excessive disturbance to vegetation; disturbed areas will be replanted with native vegetation after the end of project activities.
- BMPs to minimize effects to wildlife during project activities and operation include construction vehicles will observe maximum speed limits to minimize the possibility for any wildlife-vehicle collisions; staging and stockpile areas will be located within or immediately adjacent to the construction footprint to reduce the area of habitat disturbance.
- BMPs to minimize erosion and potential effects to wetlands include: the installation of a silt fence around the construction site and placement of gravel or rip-rap for heavy vehicle transit. A SWPPP will be implemented to minimize erosion and avoid potential effects of project activities to wetlands. Compensatory mitigation measures will be established if wetlands are destroyed.



- BMPs to minimize effects to migratory birds include limiting site work to outside of migratory Birds of Conservation Concern nesting season; conducting nest surveys to confirm presence or absence of nests in the area before work starts; and establishing buffers around active nests.

#### **Cultural and Tribal Resources**

- The design phase will avoid the Alaska Military Highway Telephone and Telegraph Line to the maximum extent feasible. If adverse effects to the historic telephone line are identified during the design phase, GSA will develop and implement mitigation measures under the Section 106 process.
- GSA contractors will be provided with an Inadvertent Discovery of Cultural Resources Plan for cultural resources and human remains, which will be implemented if such materials are uncovered during project activities. GSA will consult with the SHPO, Northway, and the Tanana Chiefs Conference to resolve any potential adverse effects resulting from an inadvertent discovery.

#### **Environmental Justice**

- All contractors employed by GSA will be subject to a background check and only passing candidates will work on the project.
- CBP officers' families will be temporarily relocated to minimize their presence onsite during project activities.

#### **Recreation**

- The indoor firing range will incorporate design elements to minimize noise pollution.

#### **Noise and Vibrations**

- Moving current Alcan LPOE residents to temporary housing will minimize the effects of project activities' noise on residents.
- Blasting will be timed with residence demolition and tenant relocation to minimize exposure.
- A Blasting Plan will be prepared that limits the amount and placement of blasting agents.
- Personal Protective Equipment (PPE) will be worn by workers during blasting activities or operations.

#### **Solid and Hazardous Waste and Materials**

- Lead-safe practices will be employed during demolition.
- National Emission Standards for Hazardous Air Pollutants (NESHAP) BMPs for demolition include removing all asbestos-containing materials, adequately wetting all regulated asbestos-containing materials (ACMs), sealing the material in leak tight containers, and disposing of the ACMs as expediently as practicable.
- All non-hazardous construction and demolition waste will be recycled to the maximum extent feasible.
- BMPs for hazardous waste separation will be followed and solid waste will be hauled to Tok, Alaska for disposal of standard materials.
- Existing ASTs and USTs will be removed and disposed of according to state and federal standards. The demolition and disposal of the ASTs and USTs will be conducted using licensed contractors and proper closure procedures.

- A Spill Response Plan will be implemented to address potential spills or release of hazardous materials.
- BMPs include regular vehicle inspections and maintenance, maintaining proper storage of hazardous materials, and maintaining a clean working environment.
- BMPs will be implemented at the indoor firing range: ventilation, High Efficiency Particulate Air (HEPA)-filtered exhaust areas, use of dust suppression and proper cleaning methods, and use of PPE such as ventilators by maintenance staff.

### **Climate Change**

- Improvements to energy efficiency and building insulation will mitigate the effects of the updated LPOE on climate change due to expected decreases in fuel usage for heating residential and other LPOE buildings.
- The modernized and enhanced layout and updated infrastructure could reduce greenhouse gas emissions.

### **MITIGATION MONITORING AND ENFORCEMENT PROGRAM**

A Mitigation Monitoring and Enforcement Program (MMEP) will be implemented to ensure that the proposed avoidance, minimization, mitigation measures, and BMPs identified above are implemented as part of the project. The MMEP will identify the timing, responsibility, and method of implementation of the proposed measures, as well as any required monitoring and enforcement activities. As part of this program, the project contractor will be required to implement the mitigation measures arising from project activities. GSA will inspect and monitor these measures to ensure compliance. Any operational mitigation measures will be implemented through the GSA Property Management Office. The MMEP will be maintained by GSA throughout project implementation and will be included as part of the administrative record for the project.

### **DECISION**

As Regional Commissioner of GSA Northwest/Arctic Region, Public Buildings Service, it is my decision to approve the preferred alternative, Alternative 1 – Expansion and Modernization in place.

### **ENVIRONMENTALLY PREFERABLE ALTERNATIVE**

The environmentally preferable alternative is the alternative that best promotes the national environmental policy expressed within the National Environmental Policy Act. In general, this refers to the alternative that will result in the least damage to the environment and best protects natural, social, and cultural resources. Based on the Final EIS, Alternative 1, the selected alternative, has been determined to be the environmentally preferable alternative because it will meet the project purpose and need while resulting in the fewest substantial, adverse environmental consequences. While Alternative 1 will result in greater short-term adverse impacts to natural resources compared to the No Action Alternative, there will be greater long-term benefits from implementation of Alternative 1. Implementation of current design features and impact reduction measures are expected to have overall net beneficial impact in the project area, such as beneficial impacts from improved traffic circulation and modernized infrastructure, which will result in improved air quality and fewer impacts on climate change, and benefits to recreation

due to increased accessibility of the Airs Hill Trailhead with road improvements. As such, Alternative 1 as analyzed in the Final EIS is the environmentally preferable alternative.

### **RATIONALE FOR IMPLEMENTING THE PREFERRED ALTERNATIVE**

The following economic, technical, and GSA mission considerations were weighed in reaching my decision. The preferred alternative, Alternative 1 - Expansion and Modernization in Place, of the Final EIS, will support the mission of the CBP while addressing existing deficiencies identified with ongoing port operations. Generally, the existing LPOE facilities and configuration do not meet CBP's current needs and do not allow for expeditious and safe inspection of the traveling public. Alternative 1 furthers the purpose and satisfies the need for the project. Implementation of Alternative 1 will:

- Increase vehicle inspection processing capacities and efficiencies at the Alcan LPOE;
- Improve safe and efficient flow of traffic through the LPOE;
- Modernize facilities to accommodate current and future demands and implementation of border security initiatives and avoid operational delays;
- Establish a dedicated helicopter landing zone and onsite indoor firing range;
- Expand the LPOE to accommodate anticipated staffing needs;
- Improve the comfort and safety of the Alcan LPOE for employees of the LPOE and the transiting public with security system updates, safety improvements, and replacement of housing units; and
- Reduce the carbon footprint of the facility with the installation of energy and water conservation measures.

I have determined that Alternative 1 will best support CBP's mission by bringing the Alcan LPOE operations in line with CBP's land port design standards and operational requirements, while addressing existing deficiencies. My decision to approve Alternative 1 is based on a balancing of likely adverse impacts with the need to improve the operational efficiency, effectiveness, security, and safety for the CBP staff and cross-border travelers at the LPOE. This decision takes into account resource concerns, mission and program of CBP, and public interests as analyzed in the Final EIS. I have reached this decision after careful consideration of the environmental analysis of the effects of Alternative 1 and the No Action Alternative, in concert with the needs of the federal government and other stakeholders.

Record of Decision Approval:

Signature:  \_\_\_\_\_ Date: 10/9/2024

Lisa Pearson  
Regional Commissioner  
Northwest/Arctic Region  
Public Buildings Service  
U.S. General Services Administration

**ATTACHMENT 1: COMMENTS RECEIVED ON THE FINAL EIS**



**REGION 10**

SEATTLE, WA 98101

October 2, 2024

Aaron Evanson, Capital Project Manager  
U.S. General Services Administration  
1301 A Street, Suite 610  
Tacoma, WA 98402

Dear Aaron Evanson:

The U.S. Environmental Protection Agency has reviewed General Services Administration's September 2024 Final Environmental Impact Statement for the Alcan Land Port of Entry Expansion and Modernization (CEQ Number 20240156, EPA Project Number 23-0017-GSA). The EPA has conducted its review pursuant to the National Environmental Policy Act and our review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to the EPA and requires the EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement.

The FEIS evaluates the potential environmental impacts associated with the expansion and modernization of the Alcan Land Port of Entry (LPOE), located on the Alaska Highway serving personal and commercial traffic between Canada's Yukon Territory and mainland Alaska. The FEIS identifies and evaluates a No Action Alternative and one Action Alternative, involving the construction of a new, expanded replacement LPOE at the existing LPOE site.

The EPA appreciates the GSA's responsiveness to EPA and the public comments. The EPA acknowledges the clarification of planned Best Management Practices to minimize construction air quality impacts and to reduce or prevent the discharge of pollutants to Waters of the United States, including modifying Alternative 1 to avoid grading the hillside. We also support GSA's commitment to minimizing the construction footprint via sustainable procurement and the net zero ready project design.

The EPA is providing the following comments to improve the environmental outcome and NEPA analysis:

- The EPA continues to recommend consulting with affected Tribes and indigenous populations to develop mitigation/prevention strategies to address potential public health impacts associated with Alternative 1, described on page 62 of the FEIS. Promising Practices for EJ

Methodologies in NEPA reviews<sup>1</sup> and Executive Order 14096 may provide useful guidance for conducting meaningful engagement.

- We appreciate the improvements to the greenhouse gas analysis, and the revised social cost of carbon analysis. We recommend that Table 3.13-4 and Table 3.13-5 include a line item for the operational emissions quantified in Appendix G-1 to provide clarity and transparency of the entire project footprint associated with Alternative 1.
- The EPA commends GSA for its consideration of renewable energy sources to help minimize climate and air impacts, including but not limited to photovoltaic cells with battery storage and microturbines. We recommend that the proposed renewable energy actions are carried forward through the ROD.

Thank you for the opportunity to review the FEIS for this project. If you have questions about this review, please contact Ariana Monroy of my staff at 206-553-2120 or at [monroy.ariana@epa.gov](mailto:monroy.ariana@epa.gov), or me, at 206-553-6518 or at [roesler.caitlin@epa.gov](mailto:roesler.caitlin@epa.gov).

Sincerely,

CAITLIN  
ROESLER

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CAITLIN ROESLER  
Date: 2024.10.02  
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Caitlin Roesler, Acting Manager  
NEPA Branch

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<sup>1</sup> Promising Practices for EJ Methodologies in NEPA Reviews: [https://www.epa.gov/sites/default/files/2016-08/documents/nepa\\_promising\\_practices\\_document\\_2016.pdf](https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf). Accessed 9/27/2024.

**ATTACHMENT 2: ERRATA SHEET**

## ERRATA SHEET DOCUMENTING GSA’S RESPONSES TO THE ENVIRONMENTAL PROTECTION AGENCY’S COMMENTS AND THE ASSOCIATED CHANGES TO THE FINAL EIS

**EPA Comment:** The EPA continues to recommend consulting with affected Tribes and indigenous populations to develop mitigation/prevention strategies to address potential public health impacts associated with Alternative 1, described on page 62 of the FEIS. Promising Practices for EJ Methodologies in NEPA reviews and Executive Order 14096 may provide useful guidance for conducting meaningful engagement.

**GSA Response:** GSA agrees with EPA’s comment and will continue to consult with the affected Tribes and indigenous populations, as needed, to develop mitigation and prevention strategies to address public health impacts as described in the Final EIS.

**EPA Comment:** We appreciate the improvements to the greenhouse gas analysis, and the revised social cost of carbon analysis. We recommend that Table 3.13-4 and Table 3.13-5 include a line item for the operational emissions quantified in Appendix G-1 to provide clarity and transparency of the entire project footprint associated with Alternative 1.

**GSA Response:** GSA agrees with EPA’s recommendation to add the annual CO<sub>2</sub>e that was calculated in Appendix G-1 of the Final EIS for operational sources (i.e., generators and boilers) to Table 3.13-4 since those operational emissions would still occur to some extent during the proposed project. However, Appendix G-1 quantified the annual operational emissions from emission sources (i.e., generators and boilers) located at Alcan LPOE in metric tons of CO<sub>2</sub>e, while Table 3.13-5 calculated the social cost of annual GHG emissions in millions of dollars. These are two different metrics that are not directly comparable; thus, GSA is not revising Table 3.13-5.

The revised Table 3.13-4 and associated text follow:

**Table 3.13-4** presents the total GHG emissions that would occur during the proposed project under Alternative 1. Overall, the total annual GHG emissions from construction-related activities, vehicle idling, and operational sources were estimated at 8,126 metric tons of CO<sub>2</sub>e, and the total project GHG emissions from construction-related activities were estimated at 31,771 metric tons of CO<sub>2</sub>e.

**Table 3.13-4. Annual and Project GHG Emissions Total under Alternative 1**

GHG Source	GHG Emissions	
	Annual CO <sub>2</sub> e (metric tons)	Project CO <sub>2</sub> e (metric tons)
Construction	5,473	21,156
Vehicle Idling	10.9	45.51
Operations*	2,642	10,569
<b>Project Total</b>	<b>8,126</b>	<b>31,771</b>

\*Operations were derived from Appendix G-1; project CO<sub>2</sub>e was estimated using a project life of four years.

CO<sub>2</sub>e = carbon dioxide equivalent



**EPA Comment:** The EPA commends GSA for its consideration of renewable energy sources to help minimize climate and air impacts, including but not limited to photovoltaic cells with battery storage and microturbines. We recommend that the proposed renewable energy actions are carried forward through the ROD.

**GSA Response:** GSA has included consideration of proposed renewable energy actions in the ROD in the discussion of Alternative 1 on page 3.