

**Comment Response Matrix for FEIS for Downtown Calexico LPOE**

<b>Commentor</b>	<b>Comment</b>	<b>Classification</b>	<b>Response</b>
IID	A preliminary review of the document indicates that there doesn't appear to be any impacts to IID Water facilities, the city of Calexico is and will be supplying water to the current and expanded LPOE.	Water Resources	The FEIS states the amount of increased demand on utilities to be within the current capacity of the utility systems. However, given the ongoing assessment of damage due to the earthquake some of these systems may require repair/relocation/upgrade. GSA is coordinating with the county to include description of potential repair/relocation/upgrade construction.
IID	As for impacts to IID Energy facilities, on page S-15, under both Alternative A and Alternative B, the document refers to "minor relocations" of existing utilities. This is repeated on page 4-19, paragraph 4.7.2 regarding Alternative A and on page 4-20, paragraph 4.7.3 regarding Alternative B. We believe this statement to be in error. Not only will these relocations be fairly large in scope, they are estimated to cost several million dollars and could take a year or longer to accomplish.	Infrastructure	The GSA is coordinating with the County on any required changes to the utility systems. As the alternatives assessed in the EIS are bounding alternatives that represent the smallest and largest potential designs. The exact changes to utilities are being coordinated with the county as the design is being finalized. The description of the changes to utilities in Sections 3.8 and 4.7.
IID	It is important to bear in mind that any new, relocated, upgraded or reconstructed IID facilities required for and by the project (which can include but is not limited to electrical utility substations, electrical transmission and distribution lines, and water delivery and drainage structures) need to be included as part of the project's CEQA and/or NEPA documentation, environmental impact analysis and mitigation. Failure to do so will result in postponement of any construction and/or upgrade of IID facilities until such time as the environmental documentation is amended and environmental impacts are fully mitigated. Any and all mitigation necessary as a result of the construction, relocation and/or upgrade of IID facilities is the responsibility of the project proponent.	Infrastructure	The GSA is coordinating with the County on any required changes to the utility systems. As the alternatives assessed in the EIS are bounding alternatives that represent the smallest and largest potential designs. The exact changes to utilities are being coordinated with the county as the design is being finalized. The description of the changes to utilities in Sections 3.8 and 4.7. This EIS is only being completed under the requirements of NEPA and not under the requirements of CEQA as well. The description of the potential changes will be discussed to the extent practicable by the issuance of the FEIS in compliance with NEPA, however, that may not satisfy all the requirements of CEQA.
Imperial County DPW	No right-of-way requisites are required at this time. Note: May not be regarded as a comment.	Permitting	The GSA will continue to coordinate with the appropriate agencies during the design and construction phases of the proposed work to ensure compliance with all applicable requirements.
Imperial County DPW	Traffic to be generated by proposed project should be provided to determine the impacts to County road facilities. A traffic study should be provided for this department's review and approval.	Traffic	Copy of the Draft Traffic Impact Study has been sent to the Imperial County Department of Works. The GSA will continue to coordinate with the appropriate agencies during the design and construction phases of the proposed work

<b>Commentor</b>	<b>Comment</b>	<b>Classification</b>	<b>Response</b>
Imperial County DPW	A Transportation Permit shall be required from road agency(s) having jurisdiction over the haul route(s) for any hauls of heavy equipment and large vehicles which impose greater than legal loads on riding surfaces, including bridges.	Permitting	The FEIS notes that the construction and operation of the LPOE will require the appropriate permits and will operate within the applicable local, state, and federal requirements.
Imperial County DPW	All solid and hazardous waste shall be disposed of in an approved solid waste disposal site in accordance with existing County, State, and Federal regulations.	Permitting	The FEIS notes that the construction and operation of the LPOE will require the appropriate permits and will operate within the applicable local, state, and federal requirements.
Imperial County DPW	The county reserves the right to make additional comments as project develops and as more information is available.	General	Noted. The GSA has and will continue to coordinate with the appropriate agencies during the design and construction phases of the proposed work
CDPH	SAS is concerned that the local air quality impacts to residents living along Cesar Chavez Boulevard and in the west Calexico neighborhoods were not adequately evaluated in the DEIS. Along Cesar Chavez Boulevard, north of Grant Street and south of Birch Street, are several residential dwellings and the eastern entrances into the west Calexico neighborhoods. Based on the average daily traffic forecasts reported in the LPOE Border Station Expansion Traffic Impact Study, dated November 2009, aligning the LPOE facility to Cesar Chavez Boulevard will increase the average daily traffic volume along this corridor of Cesar Chavez Boulevard. According to the Traffic Impact Study, if the proposed LPOE project modifications are not initiated, the estimated average daily traffic along this section of Cesar Chavez Boulevard will be 21,155 vehicles per day by the year 2015, when the modifications are scheduled to be completed. However, if the LPOE modifications are completed, the estimated average daily traffic volume along this section of Cesar Chavez Boulevard will be 32,775 vehicles per day: an increase of 11,620 vehicles. The Traffic Impact Study also predicts that Cesar Chavez Boulevard Level of Service (LOS) rating would decline from a "D" rating to an "F" rating, if the LPOE modifications are completed. The US Federal Highway Administration (FHWA) characterizes a LOS "D" rating as having unstable flow where drivers have little freedom to select their own speeds. FHWA characterizes a LOS "F" rating as having unacceptable congestion and stop-and-go traffic where traffic has a forced flow. Stop-and-go traffic means more idling traffic, which means	Air quality	Discussion of the presence of sensitive receptors has been included in the EIS and in the Air Analysis.

Commentor	Comment	Classification	Response
	increased air pollution.		
EPA	For Alternative B, EPA recommends that GSA look for opportunities to further avoid impacts with the bridged crossing, such as completely spanning the river.	Alternatives	The current design includes spanning the river completely.
EPA	GSA should also provide details on any proposed in-water work or construction and identify measures to reduce impacts to New River and worker exposure to pollutants within the New River during construction.	Alternatives	The construction will follow all appropriate safety and health requirements. The proposed bridge is planned to span the New River completely with no construction within the course of the New River. The existing bridge will be used to access the other side during construction personnel do not need to be exposed to the waters of the New River. Clarifying text has been added to the description of the bridge and its construction in the FEIS. Reference the ACOE letter received February 2011.
EPA	EPA is aware of a separate, local effort to plan, design, and construct covering or piping to underground the New River, north from the International Border to Highway 98 in the City of Calexico as discussed in an April 2010 GSA report prepared for the House Transportation and Infrastructure Committee. The relationship of the Calexico POE project and this pursuit of a 3.5-mile culvert of the New River should be explained in the FEIS.	Water Resources	The culvert plan has been added to the discussion of cumulative impacts in Section 4.14.
EPA	EPA is also concerned with possible increased vehicle emissions due to greater northbound throughput, the potential for induced demand, and the potential implementation of regular U.S. southbound inspections. The DEIS does not provide any current information on federal nonattainment status for Imperial County, does not address federal general conformity requirements, and does not assess project impacts to air quality from possible increased emissions of criteria pollutants, specifically, ozone precursors such as volatile organic compounds (VOC) or oxides of nitrogen (NOx), particulate matter with a diameter of 2.5 microns or less (PM2.5), and particulate matter with a diameter of 10 microns or less (PM10). EPA recommends the FEIS include analysis of operational impacts to air quality associated with northbound and southbound queuing at the POE, which is the main source of vehicle emissions for the project, and intersections near the POE facility. EPA is also concerned with air quality impacts associated with increased congestion on	Air Quality	The data on the affected environment has been updated in Section 3.9. Additional air quality analysis has been completed and the results are included in Section 4.10 and summarized in Appendix D. The full analysis report is available on request.

Commentor	Comment	Classification	Response
	<p>neighboring roads resulting from the project identified by GSA in the DEIS. EPA recommends that GSA identify a timeline for implementation of mitigation measures to address identified traffic impacts resulting from the project and discuss who the responsible parties would be for implementation. In addition, EPA recommends implementing measures to reduce congestion and vehicle emissions at the POE facility, and considering other strategies to reduce emissions, such as anti-idling measures.</p>		
EPA	<p>Information from the Options for Covering the New River from the International Border to Highway 98 in the City of Calexico, California and the broader New River Improvement Project as it relates to the Calexico POE project should be summarized and included in FEIS. This is particularly important since GSA has carried forward an alternative in the Draft Environmental Impact Statement (DEIS) which includes culverting the New River for the extent of the POE project site. In addition, GSA should include this broader plan to culvert the New River as part of the cumulative impacts analysis in the FEIS if it is considered to be reasonably foreseeable.</p>	Water Resources	<p>The culvert plan has been added to the discussion of cumulative impacts in Section 4.14.</p>
EPA	<p>Temporary and permanent impacts to waters of the U.S. for each alternative studied should be quantified; for example, acres of waters impacted, etc.</p>	Water Resources	<p>The impacts to Waters of the US (i.e., the New River) from construction and operation have been clarified. The GSA has and will continue to coordinate the design and construction with the U.S. Army Corps. of Engineers.</p>
EPA	<p>Include discussion in the FEIS to reflect current regulations. The link to the final Mitigation Rule, which went into effect on June 9, 2008, can be found at <a href="http://www.epa.gov/EPA-WATER/2008/April/Day-10/w6918a.pdf">http://www.epa.gov/EPA-WATER/2008/April/Day-10/w6918a.pdf</a>. Ensure that all mitigation proposed for waters of the U.S. is in compliance with the Mitigation Rule.</p>	Mitigation Measures	<p>The impacts to Waters of the US (i.e., the New River) from construction and operation have been clarified. The GSA has and will continue to coordinate the design and construction with the U.S. Army Corps. of Engineers.</p>
EPA	<p>Discuss mitigation for temporary and unavoidable indirect impacts. Temporary impact mitigation should consider additional compensatory mitigation for temporal loss of functions as well as establishing numeric criteria and monitoring of the temporary impact site to ensure that aquatic functions are fully restored. Indirect impact mitigation should consider opportunities to reduce any potential effects from shading and to compensate for possible wetland habitat fragmentation.</p>	Mitigation Measures	<p>The impacts to Waters of the US (i.e., the New River) from construction and operation have been clarified. The GSA has and will continue to coordinate the design and construction with the U.S. Army Corps. of Engineers.</p>

Commentor	Comment	Classification	Response
EPA	The DEIS indicates that Alternative A would have negligible impacts to flooding with channelization of the New River (p. 4-7). EPA recommends including hydraulic and hydrologic analysis to support this statement in the FEIS.	Water Resources	Additional discussion of potential flooding has been added to the FEIS in Section 4.2.
EPA	The DEIS also indicates that Alternative A would have little or no impact on erosion rates because the proposed changes to the New River channel would reduce erosion in the vicinity, and impervious surfaces and engineered drainage systems at the facility would reduce erosion potential slightly as compared with the existing condition. However, the FEIS should address the potential for increased erosion immediately downstream of the channelized section.	Soils	Since Alternative A, is not the Proposed Action, the design has not been as fully detailed as that for the Proposed Action. However, Under Alternative A, the GSA would coordinate with the U.S. Army Corps. of Engineers on the design of the culvert to ensure that there would not be an increase in erosion. Discussion of potential mitigations (e.g., rip rap) has been added to the discussion of Alternative A.
EPA	The DEIS should identify methods to limit the further impairment of New River waters and address mitigation as appropriate. The analysis in the DEIS does not specifically discuss how stormwater discharges from the project would affect water quality in the New River. Although the DEIS indicates the project would require mitigation measures to lessen impacts associated with soil disturbance including the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, Stormwater Pollution Prevention Plan and submittal of a Notice of Intent to the EPA prior to construction, it is unclear how stormwater will be managed to prevent further impairment to New River and what specific mitigation measures will be implemented. The DEIS should address techniques proposed for minimizing surface water contamination due to increased runoff from additional impervious surfaces and construction activities.	Water Resources	Additional discussion of stormwater management has been added to the FEIS in Section 4.2.
EPA	The water quality analysis in the FEIS should include estimates of increases in stormwater runoff locations and volume, and locations for specific design features to minimize discharges and dissipate energy. The FEIS should include the following: • Identify specific locations where runoff is expected and indicate where specific design features for stormwater management will be placed (bioswales, etc.). These options	Water Resources	Updated information on the design of stormwater control features has been included to the extent practicable. Under the provision that NEPA decisions be made before the irrevocable commitment of resources, often detailed design information is not available until an Alternative is chosen through the Record of Decision. Detailed design is authorized only after the issues decided through the NEPA process have been resolved. The GSA will coordinate the

Commentor	Comment	Classification	Response
	<p>should be presented as a part of the FEIS process and not deferred until a later stage.</p> <ul style="list-style-type: none"> <li>• Include stormwater performance standards for both construction site sediment control and post-construction project design standards in the FEIS and ROD.</li> <li>• Provide information regarding the placement, selection, and performance of any proposed Best Management Practices (BMPs) in the FEIS.</li> <li>• Commit to design, install, and maintain BMPs to control total suspended solids (TSS) carried in runoff post-construction of the project.</li> <li>• Commit to employ BMPs to maintain or reduce the peak runoff discharge rates, to the maximum extent practicable, as compared to the pre-development conditions.</li> </ul>		<p>design with the appropriate local, state, and federal permitting and regulatory agencies to ensure compliance with water quality and hydrology standards and policies.</p>
EPA	<p>EPA recommends including information in the FEIS that describes how work will be performed to construct the bridged crossing, including whether this would include any in-water work construction. If adverse impacts are expected from these in-water work activities or could result in worker exposure to pollutants from the New River, include mitigation measures to address these concerns.</p>	Alternatives	<p>Additional discussion of the bridge and its construction has been added</p>
EPA	<p>The New River water quality data referenced in the DEIS is five years old. The DEIS included information on New River and water quality data which does not reflect recent bi-national efforts to improve water quality in the New River. More recent data should be included in the FEIS and any conclusions based on outdated information should be revised if appropriate.</p>	Water Resources	<p>The proposed bridge is planned to span the New River completely with no construction within the course of the New River. The existing bridge will be used to access the other side during construction personnel do not need to be exposed to the waters of the New River. Clarifying text has been added to the description of the bridge and its construction in the FEIS.</p>

Commentor	Comment	Classification	Response
EPA	<p>EPA highlights the following on New River:• A new wastewater treatment plant and pumping station have recently gone on-line in Mexicali, which together are collecting 18 million gallons per day of sewage, pumping it 15 miles southward to an area known as "Las Arenitas", treating it, and discharging it to a tributary to the Rio Hardy, which feeds the lower Colorado River Delta in Mexico. This wastewater used to flow untreated to the New River.• The New River at the border is now achieving the annual average water quality standard for dissolved oxygen is now achieving standard of 5 mg/l. During summer months, the dissolved oxygen (DO) levels sometimes drop below the standard, but are still about ten times better than they were before the Las Arenitas treatment plant went on-line.• Bacteria levels at the border are 10 to 100 times less than before Las Arenitas wastewater treatment plant (WWTP) went on-line; however, they are still out of compliance with standards.• Mexicali has 95% coverage for wastewater, and is currently constructing another wastewater treatment to address future growth.• No odors have been detected from New River at the border since the Las Arenitas WWTP went on-line (source: Regional Water Quality Control Board monthly observational data,<a href="http://www.waterboards.ca.gov/coloradoriver/water_issues/programs/new_river/data/index.shtml">http://www.waterboards.ca.gov/coloradoriver/water_issues/programs/new_river/data/index.shtml</a>)• The Federal Occupational Health determined in 2007 that the New River "doesn't pose a threat unless river is entered or water is consumed."• EPA has invested \$41 million to improve wastewater services in Mexicali, thereby improving water quality in the New River and is helping to fund a series of constructed wetlands at Las Arenitas to further improve the quality of the wastewater being discharged to the Rio Hardy.• Mexicali's wastewater infrastructure suffered minimal damage from the earthquake, and only 60,000 gallons of untreated sewage was released from Mexicali during the 40 minute period that one of the pump stations lost electricity. Unfortunately, the City of Calexico's wastewater suffered more significant damage and discharged between 400,000 to 600,000 gallons of untreated sewage to the New River.</p>	Water Resources	Updated water quality information has been added to Sections 3.3 and 4.4.

Commentor	Comment	Classification	Response
EPA	The information provided on the New River is very outdated. The Las Arenitas WWTP has been in operation nearly three years. As a result, the water quality in the New River has improved drastically and the New River is no longer considered "the most polluted river in the U.S." (attachment included with comment)	Water Resources	Updated water quality information has been added to Sections 3.3 and 4.4.
EPA	The DEIS states, " ... the current level of pollution in the New River, which includes trash, odors, and high levels of coliform and total dissolved solids (TDS), has prevented the river from being considered a significant scenic or recreational feature for the city." As mentioned above, according to data collected by the Regional Water Quality Control Board, odors have not been detected in the New River since 2007. The FEIS should update this section to reflect this. EPA also recommends discussing how TDS affect the visual aspects of the river in the FEIS.	Water Resources	Updated water quality information has been added to Sections 3.3 and 4.4.
EPA	National Ambient Air Quality Standards (NAAQS) The project is located in Imperial County, which is a designated nonattainment area for 8-hour ozone, particulate matter with a diameter of 2.5 microns or less (PM2.5), and particulate matter with a diameter of 10 microns or less (PM10) National Ambient Air Quality Standard (NAAQS). The FEIS should include current information on these federal criteria pollutants as they relate to the project, and a general conformity applicability analysis should be conducted as part of or concurrent with the FEIS. Because of the area's nonattainment status, it is important to reduce emissions of ozone precursors and particulate matter resulting from the project.	Air quality	The data on the affected environment has been updated in Section 3.9. Additional air quality analysis has been completed and the results are included in Section 4.10 and summarized in Appendix D. The full analysis report is available on request.

Commentor	Comment	Classification	Response
EPA	<p>Conformity to the State Implementation Plan (SIP)</p> <p>The FEIS should ensure that the emissions from both the construction and the operational phases of the project conform to the approved SIP and do not cause or contribute to violations of the NAAQS. EPA's general conformity regulation (40 CFR part 93, subpart B) establishes criteria and procedures demonstrating and assuring conformity of all Federal actions not covered by the transportation conformity regulation. GSA should perform an applicability determination taking into account both direct and indirect emissions for all phases of the action. For the applicability determination, the emissions impacts caused by the proposed action should be calculated and compared against the de minimis criteria. If the emissions caused by the proposed action would exceed the applicable de minimis criteria, then, unless the proposed action is otherwise presumed to conform or otherwise be exempt [see 40 CFR 93.153(c)(2), (3), and (4)], then GSA must make an affirmative conformity determination on the basis of the criteria listed in 40 CFR 93.158. Note, however, that for general conformity purposes, air pollutants emitted outside the United States do not need to be included in the applicability analysis because they are not emitted in a U.S. nonattainment or maintenance area.</p>	Air quality	<p>The current traffic through the Calexico LPOE is in the current SIP. The modifications to the LPOE are proposed in part to reduce the current levels of traffic congestion and traffic emissions. The State is preparing a new SIP and the changes to the LPOE are being coordinated with the State to be accounted for in the new SIP.</p> <p>Additional air quality analysis has been completed and the results are included in Section 4.10 and summarized in Appendix D. The full analysis report is available on request.</p>
EPA	<p>The DEIS includes very minimal air quality analysis associated with the proposed expansion of the Calexico POE. EPA provides the following recommendation for air quality assessment in the FEIS:</p> <p>Construction-Phase Emissions: The FEIS should provide sufficient detail to allow review of the construction-phase emissions estimates of carbon monoxide (CO), volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>). EPA's AP-42, Compilation of Air Pollutant Emission Factors, or emission factors used by the California Air Resources Board (ARB) are appropriate tools to estimate fugitive dust emission.</p>	Air quality	<p>The data on the affected environment has been updated in Section 3.9. Additional air quality analysis has been completed and the results are included in Section 4.10 and summarized in Appendix D. The full analysis report is available on request.</p>

Commentor	Comment	Classification	Response
EPA	<p>The DEIS includes very minimal air quality analysis associated with the proposed expansion of the Calexico POE. EPA provides the following recommendation for air quality assessment in the FEIS:</p> <p>Operational-Phase Emissions: The FEIS should quantify any operational-phase emissions impacts to neighboring roadways resulting from the proposed action. Identify if additional mitigation measures are required to reduce impacts related to increased emissions.</p>	Air quality	<p>The data on the affected environment has been updated in Section 3.9. Additional air quality analysis has been completed and the results are included in Section 4.10 and summarized in Appendix D. The full analysis report is available on request.</p>
EPA	<p>The DEIS includes very minimal air quality analysis associated with the proposed expansion of the Calexico POE. EPA provides the following recommendation for air quality assessment in the FEIS: Increased Southbound Inspections: The DEIS indicates that GSA and U.S. Customs and Border Protection (CBP) agreed that southbound inspections should be treated as if they were permanent (p. 2-2). For clarity, although the current POE does not implement regular southbound inspection, the FEIS should identify if southbound vehicular inspections would be increased or occur regularly as part of any possible enhanced security operations at the Calexico POE. Implementing regular southbound inspections would likely increase idling vehicle emissions as vehicles wait to cross the border. Proposed southbound inspections to be performed by the U.S. and Mexico and their impacts to local roadways, freeways, and air quality, should be analyzed as they relate to this project.</p>	Air quality	<p>The traffic congestion related to southbound traffic is related to the Mexican inspection times. The U.S. southbound inspection time would be less than the Mexican inspection time. The traffic back up from the Mexican inspection will control the southbound traffic rates. GSA will continue to coordinate with Mexico to improve the processing back ups.</p>
EPA	<p>The DEIS includes very minimal air quality analysis associated with the proposed expansion of the Calexico POE. EPA provides the following recommendation for air quality assessment in the FEIS:</p> <p>Area Source Analysis: In addition to analysis of operational impacts to air quality at intersections near the POE facility, the FEIS should assess the main vehicle emissions resulting from the project from vehicles queued for inspection. Use an area source model, such as AERMOD, to assess vehicle emissions from cars waiting to cross the border (including implementation of any increased southbound inspections). Vehicle idling emissions from traffic queuing at intersections and traffic queuing to cross the border might also be modeled together as an area source.</p>	Air quality	<p>The data on the affected environment has been updated in Section 3.9. Additional air quality analysis has been completed and the results are included in Section 4.10 and summarized in Appendix D. The full analysis report is available on request.</p>

Commentor	Comment	Classification	Response
EPA	<p>The DEIS includes very minimal air quality analysis associated with the proposed expansion of the Calexico POE. EPA provides the following recommendation for air quality assessment in the FEIS:</p> <p>Hot-Spot Analysis: The FEIS should address whether any hotspot analyses should be conducted for PM (PM-10 or PM-2.5) and/or CO.</p>	Air quality	<p>The data on the affected environment has been updated in Section 3.9. Additional air quality analysis has been completed and the results are included in Section 4.10 and summarized in Appendix D. The full analysis report is available on request.</p>
EPA	<p>The DEIS includes very minimal air quality analysis associated with the proposed expansion of the Calexico POE. EPA provides the following recommendation for air quality assessment in the FEIS:</p> <p>Vehicle Emission Factors: The analysis in the DEIS used MOBILE6.2 to determine vehicle emission factors. For the State of California, EMF AC2007 is used to calculate emission rates from all motor vehicles, such as passenger cars to heavy-duty trucks, operating on highways, freeways and local roads in California. To obtain the most accurate information for projects in California, EPA recommends the use of EMFAC2007.</p>	Air quality	<p>The data on the affected environment has been updated in Section 3.9. Additional air quality analysis has been completed and the results are included in Section 4.10 and summarized in Appendix D. The full analysis report is available on request.</p>
EPA	<p>The DEIS includes very minimal air quality analysis associated with the proposed expansion of the Calexico POE. EPA provides the following recommendation for air quality assessment in the FEIS:</p> <p>Air Modeling Calculations: Appendix D Air Modeling Calculations of the CD-ROM version of the DEIS is actually an appendix on Traffic Queuing Calculations. EPA recommends including the appropriate related air analysis in the FEIS.</p>	Air quality	<p>The data on the affected environment has been updated in Section 3.9. Additional air quality analysis has been completed and the results are included in Section 4.10 and summarized in Appendix D. The full analysis report is available on request.</p>

Commentor	Comment	Classification	Response
EPA	<p>Traffic Mitigation Measures.</p> <p>The DEIS identifies several impacts to local roadways that will occur as a result of project implementation. The accompanying November 2009 Calexico West Traffic Impact Study (Appendix B) includes several recommendations to reduce those impacts, but they are not included as a part of the project. Since unmitigated traffic impacts would likely increase vehicle emissions, EPA is concerned the resulting air quality impacts will be unaddressed.</p> <p>Recommendation: Identify the responsible parties for implementation of the mitigation measures to reduce impacts to local roadways and freeway segments and a timeline for implementation of the measures.</p>	Mitigation Measures	<p>The potential mitigation recommendations in the Draft Traffic Impact Study are included as part of the requirements of preparing the Study. Actual adoption of recommendations (including assignment of responsibility and authority) are part of the preparing the Final Traffic Study. The preparation of the Final Traffic study will not be complete until long after the Record of Decision on this EIS. In accordance with the requirements of NEPA, the impacts on traffic without these mitigations are discussed to bound the potential impacts. The GSA will continue to coordinate with the State, Imperial County, and the City of Calexico in preparing the Final Traffic Study and the selection and implementation of mitigations.</p>
EPA	<p>Anti-idling Measures.</p> <p>A major source of PM10 emissions is from idling vehicles waiting to cross the border in both the northbound and southbound directions. Anti-idling measures could be appropriate mitigation of these idling emissions. GSA should consider implementing anti-idling measures that are currently being used at other POE locations, such as batching of vehicles crossing the border or measures to allow vehicles to turn their engines off, thereby reducing PM10 emissions.</p> <p>Recommendation: In the FEIS, commit to additional mitigation measures that are appropriate for this project and commit to these measures in the ROD. Consider anti-idling measures as mitigation of PM10 emissions and identify which anti-idling measures can be implemented at this POE facility. Highlight what design changes are necessary to implement anti-idling measures.</p>	Mitigation Measures	<p>Discussion of the feasibility of these mitigation measures has been added to the FEIS.</p>

Commentor	Comment	Classification	Response
EPA	<p>Construction Mitigation Measures. EPA recommends the following measures in the FEIS and ROD to reduce the impacts resulting from future construction associated with this project. Recommendations: In light of the serious health impacts associated with vehicle and diesel exhaust exposure, we recommend that the best available control measures for these pollutants be implemented at all times and recommend that a Construction Emissions Mitigation Plan is incorporated into the FEIS and committed to in the ROD. We recommend that the following measures be incorporated into a Construction Emissions Mitigation Plan, where feasible and appropriate, in order to reduce impacts associated with fugitive dust and vehicle emissions, diesel exhaust, and mobile source air toxics from construction related activities: Fugitive Dust Source Controls, Mobile and Stationary Source Controls, Administrative controls (further description of mitigation measures given)</p>	Mitigation Measures	<p>The FEIS assesses the potential impacts with the standard control measures to disclose the upper bound of potential impacts. As the applicability and implementation of specific mitigation measures is dependent on the details of each phase of construction, commitment to specific mitigations can't be made through the FEIS. The GSA will coordinate with the regulators on the implementation of mitigations throughout the construction. We can commit to a CEMP in the ROD</p>
EPA	<p>Mobile Source Air Toxics (MSAT) (Subject matter introduction given with comment) EPA recommends using the March 2007 report entitled "Analyzing, Documenting, and Communicating the Impacts of Mobile Source Air Toxic Emissions in the NEPA Process" conducted for the American Association of State Highway and Transportation Officials (AASHTO) Standing Committee on the Environment and funded by the Transportation Research Board as a resource to identify the appropriate level of analysis to include in the FEIS. Given the significant concerns about adverse health effects from mobile source pollutants and the project's potential to increase emissions at neighboring intersections, local roads, and highways that may be in close proximity to residential communities and sensitive receptors, EPA recommends performing analysis of potential MSAT impacts to identify if MSAT hotspots are a concern for the project, and if so, to inform avoidance, minimization, and mitigation options. Recommendations: Assess whether the project will result in potential MSAT hotspots at neighboring intersections, local roads, and freeways. This analysis is further described in the March 2007 AASHTO report. Procedures for toxicity-weighting, which EPA has found to be especially useful for the targeting of mitigation, are described in EPA's Air Toxics Risk Assessment Reference Library (Volume 3, Appendix B, beginning on page B-4,</p>	Air quality	<p>Additional air quality analysis has been completed and the results are included in Section 4.10 and summarized in Appendix D. The full analysis report is available on request.</p>

Commentor	Comment	Classification	Response
	<p><a href="http://epa.gov/ttnifera/data/risk/vol_3/Appendix_B_April_2006.pdf">http://epa.gov/ttnifera/data/risk/vol_3/Appendix_B_April_2006.pdf</a>).</p> <p>If MSA T hotspots are identified, discuss and commit to mitigation measures to reduce these impacts in the FEIS and ROD.</p>		
EPA	<p>Greenhouse Gas Emissions and Sustainable Communities Strategies (Subject matter introduction given with comment) EPA recommends that, as practicable, the FEIS identify the cumulative contributions to greenhouse gas emissions that will result from implementation of the project. We recommend that the FEIS include the results of the GSA Carbon Footprint tool that can be used to compile GHG emissions inventory, evaluate energy efficiency measures, and promote sustainable decision-making. (<a href="http://www.fedcenter.gov/Articles/index.cfm?id=15069&amp;pge prg id=27752&amp;pge id=3649">http://www.fedcenter.gov/Articles/index.cfm?id=15069&amp;pge prg id=27752&amp;pge id=3649</a>).</p> <p>In addition, we recommend that the FEIS discuss the potential impacts of climate change on the project and describe how the project meets the intent of statewide and national sustainability initiatives and goals to develop sustainable communities.</p> <p>Finally, the FEIS should identify if there are specific mitigation measures needed to 1) protect the project from the effects of climate change, 2) reduce the project's adverse air quality effects, and/or 3) promote pollution prevention and environmental stewardship.</p>	Air quality	The planned result of the Proposed Action is to reduce the current levels of emissions due to idling vehicles. Additional discussion of the amounts of GHG has been added to FEIS.
EPA	<p>The DEIS identifies that Mexico also plans to improve their POE facility south of the border in Mexicali. As the changes of the proposed Calexico project require connections to the proposed Mexicali POE in Mexico, EPA recommends including information in the FEIS available to date on the proposed Mexicali POE project. The Calexico POE design and completed implementation appear to be dependent on the completion and operation of the proposed Mexicali POE; therefore, coordination of the design and timing for construction and operation of both projects is critical.</p> <p>Recommendations: Include the latest information available on the proposed design of the Mexicali POE and the timeline for its planning, construction, and operation in the</p>	Infrastructure	<p>The GSA has and continues to coordinate with the Mexican government on the design of the U.S. LPOE and the connections to the Mexican LPOE. Currently, the timing of these upgrades is that the Mexican government is waiting for the U.S LPOE design to be selected and then will design their LPOE accordingly. The design of the Mexican LPOE will adapt to the U.S LPOE.</p> <p>Additional discussion of the phases of the U.S. LPOE construction in relation to the construction of the Mexican LPOE has been added to the FEIS. (We have “newer” drawings)</p>

Commentor	Comment	Classification	Response
	<p>FEIS.</p> <p>Describe any specific design features of the Mexicali POE that will require modifications to the proposed Calexico POE facilities as it was identified in the DEIS. If the specific design of the Mexicali facility is not yet known upon publication of the FEIS for Calexico, identify the process that will be used for incorporating necessary design changes to Calexico in the future. For example, if the proposed Mexicali facility includes elements that do not integrate with the Calexico facility as proposed, identify how GSA will reanalyze and potentially redesign the proposed features at Calexico.</p> <p>Develop a contingency plan for possible delays with the proposed Mexicali POE. Describe implications of the Calexico POE remaining in earlier construction phases for an extended time should the proposed Mexicali POE not be constructed in a timely manner. Include in the FEIS specific measures to reduce impacts during a possible delay.</p>		
EPA	<p>The DEIS identifies that the Calexico community has a high minority population (97.6 percent, compared to 20.2 percent in Imperial County) with 25.7 percent of the population considered low-income in Calexico and 21.5 percent of the population considered low-income in Imperial County, which are substantially greater than the state as a whole at 13.3 percent (p. 3-39). The DEIS broadly states that no environmental justice impacts are anticipated. EPA is concerned that without a comparison of project impacts to a "reference community" (the population that will benefit from the proposed project), environment justice impacts may not be sufficiently assessed. Recommendations: EPA recommends the FEIS: 1) define the reference community; 2) compare impacts of the affected community to the reference community; and 3) identify and commit to specific avoidance, minimization, and mitigation measures to reduce potential environmental justice impacts.</p>	EJ	<p>The EIS follows the CEQ guidelines for assessing Environmental Justice impacts. This determination is made due to the nature of impacts as well as the make up of the surrounding community. The determination depends on identification of minority and low-income populations as well as what impacts travel beyond the footprint of the proposed project and potentially affect the subject community.</p> <p>The percentages for minority populations in Calexico and Imperial county (97.6% and 20.2%) cannot be compared simply. There is not as great a difference as just those two Census numbers seem to indicate. The percentages of those who identified themselves as Hispanic in Calexico and Imperial County are 95.3% and 77.3% respectively. In the Southwestern U.S. there is often difficulty in relating these percentages as they are dependent on whether the respondents to the Census identified themselves as white, Hispanic, or a minority. Respondents differ in identifying whether being Hispanic means they are a minority. That is often a matter of individual definition.</p> <p>These percentages and those for other races show that the populations of Calexico and Imperial county are closer in their racial makeup that indicated by the minority percentages. Depending on the respondent's definitions of</p>

Commentor	Comment	Classification	Response
			<p>these terms, they respond differently.</p> <p>The FEIS will use the new Census data.</p> <p>In evaluating the potential for impacts beyond the footprint of the LPOE, this EIS evaluates the modification of the current LPOE, not the potential locations for a new LPOE. Therefore, comparison with other communities does not provide pertinent information to the public or the decision maker.</p> <p>The adverse environmental impacts of the construction and operations of the LPOE are primarily air quality, noise, and traffic related. The proposed action is in part mitigation to the current traffic congestion and air emissions issues in Calexico. See Sections 4.8, 4.9, and 4.10. The noise impacts would be local and would affect only commercial and semi industrial areas that already have equally high traffic noise.</p>
EPA	<p>Green Building and Energy Efficiency</p> <p>The DEIS does not discuss whether the project incorporates green building or energy efficiency into its design. (Subject matter introduction given with comment) The FEIS should also provide an "integrated strategy towards sustainability", as required by EO 13514 (issued October 5, 2009 and available at <a href="http://edocket.access.gpo.gov/2009/pdf/E9-24518.pdf">http://edocket.access.gpo.gov/2009/pdf/E9-24518.pdf</a>).</p> <p>Recommendations: Pursue the construction of a minimum Gold rated U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) building. Comply with EO 13514 and EO 13423 and associated implementing policies and guidance documents, including {Guidance on High Performance Federal Buildings, Recommendations on Sustainable Siting for Federal Facilities, Technical Guidance on Implementing the Storm water Runoff Requirements for Federal Projects under Section 438 of the Energy Independence and Security Act (EISA), See <a href="http://www.edcenter.gov/programs/eo13514/#regs">http://www.edcenter.gov/programs/eo13514/#regs</a> and <a href="http://www.edcenter.gov/programs/eo13423/">http://www.edcenter.gov/programs/eo13423/</a> for a complete list of policy and guidance documents.} (see comment for more information)</p> <p>Identify specific sustainable design concepts and measures that will be incorporated into the project design and commit to these concepts and measures in the FEIS and ROD.</p>	Construction	<p>The proposed design does include energy efficiency elements where practicable. (Use p. 46-52 of the Commissioners Presentation)</p>

Commentor	Comment	Classification	Response
	<p>Encourage a partnership between the U.S. and Mexico construction teams with the U.S. and Mexican Green Building Councils to make the new stations on both sides of the border healthier and to take advantage of economies of scale.</p> <p>Encourage the facilities to provide environmental education on features associated with the green POE projects.</p>		
EPA	<p>Presidential Permit</p> <p>The DEIS does not discuss whether GSA is coordinating with the U.S. Department of State (State Department) and whether the project requires a Presidential Permit.</p> <p>Recommendation: Identify in the FEIS: 1) if required, when the Presidential Permit application will be submitted to State Department, and 2) whether this EIS will be used by the State Department when evaluating the Presidential Permit application, or if the State Department will develop a separate NEP A analysis for the border crossing. EPA will review the Presidential Permit application through an interagency review process lead by the State Department, and may have additional comments on the border crossing at that time.</p>	Permitting	<p>The GSA is coordinating with the Department of State. Additional information on the Presidential permit has been added to the FEIS. DOS will use this EIS.</p>
Caltrans 2010	<p>Encroachment Permit</p> <p>An encroachment permit for any work within State right-of-way will be required, including signal work, which is required as stated in the California MUTCD Section 4B. 112 (CA) Encroachment Permits: Encroachment permits are required for a local agency or a private party to install or modify signals and street lighting on a state highway. Policy and guidelines for this can be found at: <a href="http://www.dot.ca.gov/hq/traffops/signtech/mutcdsupp/pdf/camutcd/CAMUTCD-Part4.pdf">http://www.dot.ca.gov/hq/traffops/signtech/mutcdsupp/pdf/camutcd/CAMUTCD-Part4 .pdf</a></p>	Traffic Study	<p>While this comment was made regarding the Traffic Study, the issues discussed also pertain to the EIS.</p> <p>Noted. The GSA has and will continue to coordinate with the appropriate agencies during the design and construction phases of the proposed work.</p>

Commentor	Comment	Classification	Response
City of Calexico	Imperial County has the highest rate of asthma-related childhood hospitalizations of all counties in California. Historically, the worst air quality in Imperial County has been in Calexico. Studies have linked associations between children who live close to high traffic areas with increased asthma symptoms and hospital visits due to asthma related symptoms. SAS recognizes that traffic on Cesar Chavez Boulevard was forecasted to increase despite plans to align the LPOE to Cesar Chavez Boulevard. However, by aligning the LPOE to Cesar Chavez Boulevard, the volume of vehicles will be significantly augmented causing extreme traffic congestion in a residential area. The resulting impacts to air quality need to be more fully analyzed	Traffic Study	<p>While this comment was made regarding the Traffic Study, the issues discussed also pertain to the EIS.</p> <p>The proposed LPOE has only one entrance and one exit.</p> <p>i) The existing LPOE is aligned with SR-111/Imperial Ave and allows northbound vehicles to directly access SR-111/Imperial Ave or Paulin Ave. Southbound vehicles can exit only on SR-111/Imperial Ave. The existing LPOE will be closed to vehicular traffic once the proposed LPOE is fully operational.</p> <p>ii) The proposed LPOE will be aligned with Cesar Chavez Blvd and allows northbound vehicles to directly access Cesar Chavez Blvd or SR-111/Imperial Ave. Southbound vehicles can exit only on Cesar Chavez Blvd.</p> <p>The analysis of air quality impacts in the EIS includes impacts to special receptors and hot spot analysis.</p>
IBWC	<p>General Comment – Where applicable, the report should address that the USIBWC works with its Mexican counterpart, the Mexican IBWC and other Mexican agencies (Local, State, Federal) to ensure that any proposed project along the border does not have any adverse effects on either side of the border with respect to sanitation, water quality, flood control and boundary demarcation. Refer to “United States Code, 22 USC Sec. 277a” for further details.</p> <p>Alternative A or B (the preferred alternative) will require international coordination.</p>	Infrastructure	The language has been added to the EIS in the sections discussing infrastructure (Sections 3.8 and 4.7).
IBWC	Page S-13, Water Resources, Alternatives A and B - USIBWC recommends that the GSA consider the possibility of retaining onsite the stormwater runoff generated by the proposed project	Water	Discussion of the proposed methods of directing and retaining stormwater has been added to the EIS.

Commentor	Comment	Classification	Response
IBWC	Page 4-5, 4.2.1.1 Surface Water - The report states the following: "Using available mapping resources, along with applicable Federal, state, and county regulations, an evaluation of the project was performed with respect to onsite drainage, flooding, erosion, and jurisdictional watercourses. Maps of the project site were compared to the FEMA Flood Insurance Rate Map, USGS topographic maps, and evaluated along with field inspection. Federal jurisdictional waters include both wetlands and waters of the U.S. Maps of the project area were evaluated for wetlands and waters of the U.S." The report should address if the border project area in Mexicali, Mexico and its respective available data (Inegi topo.maps, Mexican studies, etc.) was taken into consideration with respect to onsite drainage, flooding, erosion, and international transboundary watercourses.	Water	Discussion has been added about the coordination between the design of the US and Mexican LPOEs at Calexico/Mexicali. A figure showing the preliminary design of the Mexican LPOE has been added. The final design of the Mexican LPOE, detailing the drainage and covering of the New River, will be done after, and in coordination with, the final design of the US LPOE.
IBWC	Page 4-5, 4.2.1.1 Surface Water – The report states: "Impacts to onsite drainage would be considered significant if any element of the project increases the amount of stormwater runoff, or changes or redirects the stormwater runoff to cause any adverse effects to adjacent properties". It is unclear if this statement considers the area in Mexicali along the border. The report should state: "Impacts to onsite drainage would be considered significant if any element of the project increases the amount of stormwater runoff, or changes or redirects the stormwater runoff to cause any adverse effects to adjacent properties including those adjacent properties in Mexicali along the border".	Water	The phrase "on either side of the International Border" has been added to the referenced text.
IBWC	Page 4-5, 4.2.1.1 Surface Water - The report states: "Impacts to flooding would be considered significant if any element of the project increases the depth or duration of flooding". It is unclear if this statement considers the area in Mexicali along the border. The report should state: "Impacts to flooding would be considered significant if any element of the proposed project increases the depth or duration of flooding on both sides of the border."	Water	The phrase "on either side of the International Border" has been added to the referenced text.

<b>Commentor</b>	<b>Comment</b>	<b>Classification</b>	<b>Response</b>
IBWC	Page 4-5, 4.2.1.1 Surface Water - The report states: "Impacts to erosion can be considered significant if any element of the project increases the severity of erosion". It is unclear if this statement considers the area in Mexicali along the border. The report should state: "Impacts to erosion can be considered significant if any element of the proposed project increases the severity of erosion on both sides of the border."	Water	The phrase "on either side of the International Border" has been added to the referenced text.
IBWC	Page 4-6, 4.2.1.1 Surface Water – The report states: Impacts to jurisdictional watercourses can be considered significant if any element of the project disturbs the watercourses. Disturbed jurisdictional watercourses require mitigation by the U.S. Army Corps of Engineers. It is unclear if this statement considers the area in Mexicali along the border. The report should state: "Impacts to jurisdictional watercourses can be considered significant if any element of the project disturbs the international transboundary watercourses. Disturbed international transboundary watercourses will require mitigation by the U.S. Army Corps of Engineers, the U.S.I.B.W.C, the Mexican I.B.W.C, and any other Mexican agencies which are affected."	Water	The phrase "on either side of the International Border" has been added to the referenced text.
IBWC	Page 4-6, 4.2.2.1 Surface Water, Onsite Drainage – Please refer to comment number 2.	Water	Discussion of the proposed methods of directing and retaining stormwater has been added to the EIS.
IBWC	Page 4-6, 4.2.2.1 Surface Water, Flooding – Please refer to comment number 5. It is unclear if this section considers the area in Mexicali along the border.	Water	Text has been added to state that the flooding issues would be coordinated with the Mexican LPOE design and construction.
IBWC	Page 4-7, 4.2.2.1 Surface Water, Erosion – Please refer to comment number 6. It is unclear if this section considers the area in Mexicali along the border.	Water	Text has been added to state that the erosion issues would be coordinated with the Mexican LPOE design and construction.
IBWC	Page 4-7, 4.2.2.1 Surface Water, Jurisdictional Watercourse – Please refer to comment number 7. It is unclear if this section considers the area in Mexicali along the border.	Water	Text has been added to state that the New River issues would be coordinated with the Mexican LPOE design and construction.

<b>Commentor</b>	<b>Comment</b>	<b>Classification</b>	<b>Response</b>
IBWC	Page 4-7, 4.2.2.1 Surface Water, Jurisdictional Watercourse – The report states: “Coordination with the International Boundary and Water Commission (IBWC) is necessary in matters pertaining to sanitation, water quality, and flood control in the border region. After border region, the following should be inserted: (as per United States Code: 22 USC Sec. 277a).	Water	Change made.
IBWC	Page 4-7, 4.2.2.1 Surface Water, Jurisdictional Watercourse – The report states: “Coordination with the International Boundary and Water Commission (IBWC) is necessary in matters pertaining to sanitation, water quality, and flood control in the border region. GSA would consult with IWBC regarding proposed changes to the New River.” Please change IWBC to IBWC.	Water	Change made.
IBWC	Page 4-8, 4.2.3.1 Surface Water, Onsite Drainage – Please refer to comment number 2.	Water	Discussion of the proposed methods of directing and retaining stormwater has been added to the EIS
IBWC	Page 4-8, 4.2.3.1 Surface Water, Flooding – Please refer to comment number 5. It is unclear if this section considers the area in Mexicali along the border.	Water	Text has been added to concerning the Mexican side of the International Border at the Mexican LPOE.
IBWC	Page 4-8, 4.2.3.1 Surface Water, Erosion – Please refer to comment number 6. It is unclear if this section considers the area in Mexicali along the border.	Water	Text has been added to concerning the Mexican side of the International Border at the Mexican LPOE.
IBWC	Page 4-8, 4.2.3.1 Surface Water, Jurisdictional Watercourse – Please refer to comment number 7. It is unclear if this section considers the area in Mexicali along the border.	Water	Text has been added to concerning the Mexican side of the International Border at the Mexican LPOE.