APPENDIX B

Scoping, Public Involvement, and Agency Coordination

APPENDIX B

Public Outreach Efforts

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Esteban Jimenez
ORGANIZATION/ ORGANIZACIÓN	Hilos de Plata
ADDRESS/DIRECCIÓN	445 Cortez Dr. 79905
TELEPHONE/TELÉFONO	915 873 3414
EMAIL/ CORREO ELECTRÓNICO	

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:

No Commercial Vehicles on Bota

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Cynthia Renteria
ORGANIZATION/ ORGANIZACIÓN	Washington-Delta Neighborhood
ADDRESS/DIRECCIÓN	354 Francis St.
TELEPHONE/TELÉFONO	915-637-3028
EMAIL/ CORREO ELECTRÓNICO	renteria.cynthia@gmail.com

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:

I am in favor of option 4 which relocates commercial traffic away from BOTA

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Mavi Madrid
ORGANIZATION/ ORGANIZACIÓN	Hijos de Plata
ADDRESS/DIRECCIÓN	5920 Jemez
TELEPHONE/TELÉFONO	915) 346 – 8039
EMAIL/ CORREO ELECTRÓNICO	

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:

No Trucks comerciales.

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Antonia Velazco
ORGANIZATION/ ORGANIZACIÓN	Hijos de Plata
ADDRESS/DIRECCIÓN	3005 Pera 79905
TELEPHONE/TELÉFONO	(915) 270 1827
EMAIL/ CORREO ELECTRÓNICO	

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:

No trocas comerciales puente libre

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Myrting Estrada
ORGANIZATION/ ORGANIZACIÓN	Hijos de plata
ADDRESS/DIRECCIÓN	207 HARDEST y PL.
TELEPHONE/TELÉFONO	(915) 2525695
EMAIL/ CORREO ELECTRÓNICO	

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS: NO trocas comerciales en el bota

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Vela Garcia
ORGANIZATION/ ORGANIZACIÓN	Hijos de Plata
ADDRESS/DIRECCIÓN	4534 Blanco Ave. Apt. 2014
TELEPHONE/TELÉFONO	915 276 2405
EMAIL/ CORREO ELECTRÓNICO	N/A

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS: No Commercial Vehicles
On Bater

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Margarita Gomez (Margie)
ORGANIZATION/ ORGANIZACIÓN	Hilos De Plata
ADDRESS/DIRECCIÓN	5709 Auburn Ave
TELEPHONE/TELÉFONO	909 - 234 - 1078
EMAIL/ CORREO ELECTRÓNICO	margie.48.P@gmail.com

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:

No Commercial Vehicles on Bota

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Olga Yolinda
ORGANIZATION/ ORGANIZACIÓN	Hijos de Plata
ADDRESS/DIRECCIÓN	5420 Joyce El Paso Tex
TELEPHONE/TELÉFONO	915-250 4129
EMAIL/ CORREO ELECTRÓNICO	

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:

Si, quiero Tiendas Comerciales

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	DANIEL Chairez
ORGANIZATION/ ORGANIZACIÓN	Hijos de Plata
ADDRESS/DIRECCIÓN	439-5 Concepcion
TELEPHONE/TELÉFONO	915 772 8917
EMAIL/ CORREO ELECTRÓNICO	none

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:

Against bringing trucks to BOTA
Polluting our air

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	DAVID D. VALENZUELA
ORGANIZATION/ ORGANIZACIÓN	WASHINGTON DELTA NEIGHBORHOOD ASSOCIATION
ADDRESS/DIRECCIÓN	# 7051 RAMOS CT.
TELEPHONE/TELÉFONO	HILO DEL PLATA
EMAIL/ CORREO ELECTRÓNICO	915-304 7927

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:

NO COMMERCIAL VECHICLES ON BOTA

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Dolores A Valenzuela
ORGANIZATION/ ORGANIZACIÓN	Washington Delta Nieborhood Assocation
ADDRESS/DIRECCIÓN	7051 Ramos dr
TELEPHONE/TELÉFONO	304- 7924
EMAIL/ CORREO ELECTRÓNICO	

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:
No Commercial Vichiles on Bota

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	QUIRINO VILLA
ORGANIZATION/ ORGANIZACIÓN	Washington Delta Neighborhood Association
ADDRESS/DIRECCIÓN	405 Kyle st 79905
TELEPHONE/TELÉFONO	915.926.6709
EMAIL/ CORREO ELECTRÓNICO	quillaz@gmail.com

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:

No Commercial Vechicles ON BotA

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Estela González M
ORGANIZATION/ ORGANIZACIÓN	Hijas de Plata
ADDRESS/DIRECCIÓN	505 Chelsea St
TELEPHONE/TELÉFONO	915 772 57 89
EMAIL/ CORREO ELECTRÓNICO	

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:

No queremos todos
Comentarios Bota

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Corina Robles
ORGANIZATION/ ORGANIZACIÓN	Washington Heights Neighborhood Association
ADDRESS/DIRECCIÓN	700 Huerto St
TELEPHONE/TELÉFONO	915-808-9576
EMAIL/ CORREO ELECTRÓNICO	corirobles@yahoo.com

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:

No commercial vehicles on BOTA
Plan #4

COMMENT FORM – PUBLIC INFORMATIONAL MEETING
Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS
Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Debra Scott
ORGANIZATION/ ORGANIZACIÓN	Hijos de Plata
ADDRESS/DIRECCIÓN	4913 Chesterfield 79903
TELEPHONE/TELÉFONO	915-491-3684
EMAIL/ CORREO ELECTRÓNICO	dscott_89@yahoo.com

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:
No commercial ~~veh~~ Vechicles on BotA

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Sylvia Moreno
ORGANIZATION/ ORGANIZACIÓN	Washington Delta Neighborhood Association
ADDRESS/DIRECCIÓN	7019 Cielo Vista 79925
TELEPHONE/TELÉFONO	915 781-5789
EMAIL/ CORREO ELECTRÓNICO	morenosylvia721@gmail.com

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS: No commercial vehicles on Bota

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO Carmen Villasana

ORGANIZATION/ ORGANIZACIÓN Hielo De ~~Oro~~ Plata

ADDRESS/DIRECCIÓN 7845 Lilac # 41

TELEPHONE/TELÉFONO (915)

EMAIL/ CORREO ELECTRÓNICO

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:

No Commercial Vechicles on Bota

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Frances Loera
ORGANIZATION/ ORGANIZACIÓN	Hijos de Plata
ADDRESS/DIRECCIÓN	8344 Glen Haven P 79907
TELEPHONE/TELÉFONO	915-8672835
EMAIL/ CORREO ELECTRÓNICO	

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:

No Commercial Vechicles on Bota

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Margarita Villalobos
ORGANIZATION/ ORGANIZACIÓN	Hijas de Plata
ADDRESS/DIRECCIÓN	344 Val Verde St.
TELEPHONE/TELÉFONO	915 373-7328
EMAIL/ CORREO ELECTRÓNICO	margievillalobos915@gmail.com

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:

No comment at this time on Bota

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Suzanne Marrufo
ORGANIZATION/ ORGANIZACIÓN	Washington/Delta Neighborhood Ass.
ADDRESS/DIRECCIÓN	652 De Vargas
TELEPHONE/TELÉFONO	915 487 5434
EMAIL/ CORREO ELECTRÓNICO	tuti652@yahoo.com

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:

I would like to see No Commercial Vehicles on BOTA)
#4

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO Sarai Tarin

ORGANIZATION/ ORGANIZACIÓN N/A

ADDRESS/DIRECCIÓN 200 Wallington Dr. Apt. 140

TELEPHONE/TELÉFONO 915-765-1167

EMAIL/ CORREO ELECTRÓNICO

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:

No comercial traffic at BOTA! Comercial vehicles have several negative impacts such as congestion, security concerns, economic costs, social disruption, and most importantly, environmental impacts such as air pollution and greenhouse gas emissions.

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Eileen Graham
ORGANIZATION/ ORGANIZACIÓN	Neighborhood Concerned Citizen
ADDRESS/DIRECCIÓN	5400 Delta Dr
TELEPHONE/TELÉFONO	0
EMAIL/ CORREO ELECTRÓNICO	logan072012@yahoo.com

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:
Do not" want Commercial Vehicles on bota

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Edward Graham
ORGANIZATION/ ORGANIZACIÓN	Concerned Citizen
ADDRESS/DIRECCIÓN	5400 Delta Dr
TELEPHONE/TELÉFONO	0
EMAIL/ CORREO ELECTRÓNICO	logan072012@yahoo.com

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:
Dont want commercial vehicles on Bota

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Vivian Cordova-Flores
ORGANIZATION/ ORGANIZACIÓN	Washington Association
ADDRESS/DIRECCIÓN	516 De Vargas
TELEPHONE/TELÉFONO	915-401-4007
EMAIL/ CORREO ELECTRÓNICO	VIV92762@gmail.com

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:

We don't want commerical truck on the BOTA due to the amount of pollution that is being let out to all surrounding communities.

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Thaden, Irma E. A.
ORGANIZATION/ ORGANIZACIÓN	Washington Delta Neighborhood Associat
ADDRESS/DIRECCIÓN	3222 Frankfort
TELEPHONE/TELÉFONO	915 328-8047
EMAIL/ CORREO ELECTRÓNICO	iesguilar3@yahoo.com

*Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following **prior to JULY 26, 2024**. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

*Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del **26 de Julio de 2024** a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:
No Commercial Vehicles on the Bridge of the Americas

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Elizabeth C. Ramirez
ORGANIZATION/ ORGANIZACIÓN	Washington Park Association
ADDRESS/DIRECCIÓN	516 De Vargas Dr.
TELEPHONE/TELÉFONO	(915) 479-4122
EMAIL/ CORREO ELECTRÓNICO	ramirez.elizabethc@yahoo.com

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:

Renovate the buildings only! No commercial vehicles on the bridge! Yes on BOTA!

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Sara Muñoz
ORGANIZATION/ ORGANIZACIÓN	Washington Delta
ADDRESS/DIRECCIÓN	151 S. Maryland
TELEPHONE/TELÉFONO	915 7813881
EMAIL/ CORREO ELECTRÓNICO	sara.mun24@yahoo.com

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:
No Commercial Vehicles BOTA

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Concern Citizen
ORGANIZATION/ ORGANIZACIÓN	Washington Delta Neighborhood
ADDRESS/DIRECCIÓN	Not necessary
TELEPHONE/TELÉFONO	No calling ME
EMAIL/ CORREO ELECTRÓNICO	DONT USE IT

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:

No comercial vehicles on BOTA. Increase in cars and Automobiles ~~trucks~~ will increase Emissions

COMMENT FORM – PUBLIC INFORMATIONAL MEETING
Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS
Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Carol B Trujillo
ORGANIZATION/ ORGANIZACIÓN	Hilos De Plata
ADDRESS/DIRECCIÓN	239 Euclid ST
TELEPHONE/TELÉFONO	915 873-8269
EMAIL/ CORREO ELECTRÓNICO	

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:
No Commercial Vehicles BOTA

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Albert F. Amaya
ORGANIZATION/ ORGANIZACIÓN	Washington Delta Neighborhood Association
ADDRESS/DIRECCIÓN	~~3202~~ 637 Alicia St.
TELEPHONE/TELÉFONO	915 309-3067
EMAIL/ CORREO ELECTRÓNICO	afamaya99@yahoo.com

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:

No Commercial Vehicles on the Bridge of the Americas

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	SERGIO ROMO
ORGANIZATION/ ORGANIZACIÓN	HILOS DE PLATA
ADDRESS/DIRECCIÓN	177 S. GLENWOOD
TELEPHONE/TELÉFONO	(915) 241-3102
EMAIL/ CORREO ELECTRÓNICO	———

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS: NO COMMERCIAL VEHICLES ON BOTA

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Evangelina Torres
ORGANIZATION/ ORGANIZACIÓN	Hijos de Plata
ADDRESS/DIRECCIÓN	445 Cortez Dr. 79905
TELEPHONE/TELÉFONO	915 873 3414
EMAIL/ CORREO ELECTRÓNICO	

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS: No Commercial vehicles on Bota

GSA

COMMENT FORM – PUBLIC INFORMATIONAL MEETING

Proposed Improvements at the Bridge of The Americas Land Port of Entry (LPOE)
El Paso County, El Paso, Texas June 26, 2024

FORMULARIO DE COMENTARIOS – REUNIÓN INFORMATIVA DE LAS PARTES INTERESADAS

Modernización del Puerto de Entrada Terrestre del Puente de las Américas
Condado de El Paso, El Paso, Texas | el 26 de junio de 2024

NAME/ NOMBRE Y APELLIDO	Rebecca Guerra
ORGANIZATION/ ORGANIZACIÓN	Hilos De Plata
ADDRESS/DIRECCIÓN	4451 Delta
TELEPHONE/TELÉFONO	
EMAIL/ CORREO ELECTRÓNICO	

Please respond with any feedback, you may write on the back or include additional sheet(s) if necessary. This comment form may be turned in today, emailed or mailed to the following ***prior to JULY 26, 2024****. While we are not able to respond individually to these comments, your input is welcomed and valuable to the team and will be incorporated into the EIS document.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102

BOTA.NEPACOMMENTS@gsa.gov

Por favor dirija sus comentarios a la persona indicada, usted puede continuar escribiendo en la parte posterior o en una hoja adicional si es necesario. Este formulario de comentarios puede ser entregado hoy, por correo electrónico, o al código postal antes del ***26 de Julio de 2024*** *a la siguiente dirección. Su aportación es bienvenida y valorada por nuestro equipo. Aunque no podemos responder individualmente, sus comentarios serán incorporados en el documento EIS.*

Karla R. Carmichael NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
819 Taylor St, Room 12-B, FW, TX 76102.

BOTA.NEPACOMMENTS@gsa.gov

COMMENTS/COMENTARIOS:
No commercial Vechicles on BotA

United States General Services Administration
1800 F Street NW
Washington, D.C. 20405
Delivered electronically to BOTA.NEPAcomments@gsa.gov

To Whom It May Concern:

On behalf of the Texas business community, I write to express our gratitude for your efforts to modernize the Bridge of Americas (BOTA) port of entry in El Paso. We believe modernization of this major trade gateway is sorely needed and look forward to participating in a process that will surely yield fruitful results that support economic growth throughout our entire binational region. However, we strongly urge you to avoid removing commercial traffic from your final strategy to modernize BOTA.

We trust that all required due diligence will be performed prior to any final decisions being made regarding this complex and impactful public project. Of special interest to us will be the thoughtful consideration of the results of the operational, administrative, environmental, and economic impact studies fiduciarily required to ensure informed decision-making based on objective factors.

One area of particular interest for us is in addressing the root causes of the congestion at the BOTA. We must take a hard look at improving operational efficiencies at BOTA and consider other important factors inconspicuously impacting traffic flow. For instance, high toll charges disproportionately affect individuals and families who are already financially strained, compelling them to go out of their way to use the free BOTA to avoid excessive toll fees at a bridge near them.

Congestion at BOTA can be attributed to the significant influx of individual and family vehicles seeking toll relief at peak times. This being said, waiving tolls for noncommercial vehicles at all toll bridges during key hours is a simple solution that will certainly help alleviate the current pressure on BOTA by dispersing traffic across multiple crossings. With the region's growth and the economic challenges faced by many residents, it is no longer feasible for families to be expected to pay tolls during peak times. This is just one suggestion for relief, and we welcome the opportunity to analyze this and other potential solutions with you.

TAB strongly supports the need to prioritize the 'Port of the Future' program in the BOTA modernization initiative. It is crucial that this program becomes a key element of the modernization strategy, as its promulgation of high-quality standards is directly relevant to enhancing efficient cross-border trade to support our state's business community. The program's approach to consistently solving common challenges, particularly in the realm of emerging technologies, is essential for the long-term success of this endeavor.

Furthermore, the appropriate agencies responsible for the efficient and effective movement of traffic across BOTA must be given the required directives and funding to invest in impactful

technology that will help enhance security while maximizing operational efficiency. Additionally, it is important to ensure that the existing BOTA infrastructure is utilized at **full capacity at all times**. Consistent operational efficiency is achievable by diminishing unnecessary bureaucratic impediments while taking advantage of leading-edge technology and common-sense solutions.

It is essential to understand that the economic vitality of our region heavily depends on the efficiency and sustainability of our binational transportation infrastructure, particularly for commercial activities. Any modernization plan needs to consider the full impact on all stakeholders, including the logistics and manufacturing industries, before it is implemented so that the communities that rely on robust and efficient cross-border commercial activity will not be adversely impacted.

In summary, we urge the GSA and El Paso City officials to:

1. Commission a comprehensive array of professional studies to determine the operational, administrative, environmental, and economic impact of the BOTA modernization mission;
2. Establish optimal operational efficiency as the primary mission objective for the BOTA modernization effort;
3. Consider and address the full spectrum of potential root causes for the traffic congestion at BOTA and not just the symptoms;
4. Use appropriated funding to reform the toll policies at all land ports of entry to alleviate congestion at BOTA during peak times; and
5. Fully consider the broader social and economic implications of all options, especially any effort to reroute commercial traffic.

Texas' binational economy deserves a solution that is equitable, economically sound, and sustainable for **all** stakeholders on both sides of the border. Maintaining an efficient and reliable flow of trade through our region will encourage investment and produce prosperity for all. Thank you for your coordination.

Sincerely,

Glenn Hamer
President & CEO
Texas Association of Business

John Esparza
President & CEO
Texas Trucking Association

Cc: Sito Negron, Senior Policy Advisor, El Paso Precinct 2, L.Negron@epcounty.com

APPENDIX B

Scoping, Public Involvement, and Agency Coordination

APPENDIX B

Public Outreach Efforts

1331 Texas Ave.
El Paso, TX 79901
Phone: 915-585-5100
Toll Free: 888-988-9996
Fax: 915-544-3789
www.trla.org

December 19, 2023

Karla R. Carmichael
NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
Greater Southwest Region 7
819 Taylor St, Room 12-B
Ft. Worth, TX 76102
VIA: karla.carmichael@gsa.gov

Re: Request for extension of time, Notice-PBS-2023-04; Docket No. 2023-0002; Sequence No. 23

Dear Karla R. Carmichael:

As you know, the public scoping comment period for the Bridge of the Americas (BOTA) Modernization began on December 13, 2023 and ends on January 16, 2024. On behalf of residents of the San Xavier neighborhood in El Paso, Texas, we are requesting an extension of time for two weeks, ending on January 30, 2023. The San Xavier residents live immediately in front of the BOTA.

The scoping comments are critical to the NEPA process because they will inform the necessary analyses for the project's Environmental Impact Statement (EIS). The residents anticipated the Notice of Intent (NOI) in the summer or early Fall. Given the delayed NOI, and the fact that the current timeline is interrupted by the holidays, it will be very difficult for residents of San Xavier to submit comments by the current deadline. A two-week extension will provide a meaningful opportunity for public comment for this major project, which will in turn ensure that GSA has public input and information to inform its EIS at the earlier stages of the NEPA process. At your earliest convenience, please let us know if you will grant this extension.

Respectfully Submitted,

TEXAS RIOGRANDE LEGAL AID, INC.
1331 Texas Ave.
El Paso, TX 79901

/s/ Verónica Carbajal
Verónica Carbajal
Attorney at Law
TX State Bar No. 24045617
Tel: (915) 585-5107
Fax: (915) 544-3789
E-mail: vcarbajal@trla.org

/s/ Paola Camacho
Paola Camacho
Attorney at Law
State Bar No. SC105267
Tel: (915) 585-5118
Fax: (915) 544-3789
E-mail: pcamacho@trla.org

1331 Texas Ave.
El Paso, TX 79901
Phone: 915-585-5100
Toll Free: 833-329-8752
Fax: 956-591-8752
www.trla.org

February 23, 2024

General Services Administration
Karla R. Carmichael
NEPA Program Manager
Environmental, Fire and Safety & Health Branch
GSA/PBS, Facilities Management and Services Programs Division
Greater Southwest Region 7
819 Taylor St, Fort Worth, TX

I. Introduction.

On behalf of Familias Unidas del Chamizal and residents of the San Xavier neighborhood, Texas RioGrande Legal Aid, Inc. submits these comments on the proposed Bridge of the Americas Modernization Project ("BOTA Project"), Docket No. 2023-0002, in response to the General Services Administration's ("GSA") Notice of Intent to Prepare an Environmental Impact Statement ("EIS") under the National Environmental Policy Act ("NEPA").[1] Familias Unidas del Chamizal and residents of the San Xavier neighborhood request that the GSA select Alternative 4.[2]

The BOTA is a "Free Bridge" as a result of the Chamizal Treaty of 1963. The BOTA's lack of tolls and its central location have made it a magnet for traffic, particularly passenger vehicles and heavy-duty diesel commercial traffic ("semis" or "heavy-duty trucks"). Unlike most land ports of entry in the country, BOTA is within close proximity of residential neighborhoods. Most efforts to expedite traffic on the BOTA have focused on traffic heading north, despite the fact that congestion also forms heading south every single day. Even more alarming, due to the failings of TXDOT's I-10 Connect Project, southbound traffic at the BOTA backs up into I-10 East, I-10 West and US-54. If GSA selects Alternative 4 and removes the semi traffic from the BOTA, it will reduce the traffic congestion on its north- and southbound arteries.

The BOTA Project is funded by the Infrastructure Investment and Jobs Act ("Bipartisan Infrastructure Act") and by the Inflation Reduction Act ("IRA"), which enshrined climate mitigation, pollution abatement, energy efficiency, and community preservation and restoration into American infrastructural growth and job creation. By utilizing Bipartisan Infrastructure Act and IRA funds in its BOTA Project, GSA has committed itself to ensure that the BOTA Project

[1] General Services Administration, Notice-PBS-2023-04; Docket No. 2023-0002; Sequence No. 23, Notice of Intent to Prepare an Environmental Impact Statement and Notice of Public Scoping Meeting and Comment Period.
[2] Commenters hereby incorporate their April 12, 2023 comments, attached as Exhibit A, TRLA, Complaint under Title VI of the Civil Rights Act of 1964 on behalf of the San Xavier Community, December 7, 2023 [hereinafter TRLA Title VI Complaint].

translates into benefits for the communities and the environment, in addition to combating climate change, ameliorating environmental injustices, and improving community resiliency.

Commenters represent Southside residents currently living with the longstanding environmental harms of the BOTA and threatened by the Project's proposed expansion of the Port of Entry ("POE"). Southside residents have been continuously bombarded by the environmental harms that stem from commercial growth at the BOTA, with heavy commercial truck traffic stalling for hours on a daily basis directly next to residences and Zavala Elementary School.

GSA must select Alternative 4 and remove all heavy-duty commercial traffic from the BOTA. GSA faces two choices: *to help* ameliorate the harms of this history by removing and relocating semis from the BOTA, or to *encroach further* on already vulnerable communities with noxious pollution from heavy-duty commercial truck traffic. GSA should not repeat history and perpetuate unacceptable threats to public safety, the economy, and the civil and human rights of Southside El Paso communities. Alternative 4 is currently the only proposed alternative that can accomplish this goal and satisfy the goals of the Bipartisan Infrastructure Act and IRA, as well as achieve Title VI and NEPA compliance. GSA cannot shirk its duties under federal law by choosing an alternative that continues to permit the incessant idling of heavy-duty diesel commercial traffic at the cost of public health.

GSA must prepare an EIS that addresses the significant impacts of the BOTA Modernization Project and adequately mitigates those impacts. To do so, GSA must conduct a robust environmental justice analysis and fully inform itself of the immense benefits of removing commercial truck traffic from the BOTA in both directions and the harms of allowing it to continue, including a discussion of local climate change impacts. This analysis must include a detailed history of environmental racism in Southside El Paso and fully disclose the wide-reaching impacts of the BOTA on these communities, which are already overrun with air pollution sources.

GSA must also implement other environmental pollution reduction strategies, including public transportation on the BOTA for students and daily commuters, additional ready lanes and improved technology to expedite traffic heading north, incentives to boost electric vehicles, native landscaping, and the closure of Zavala Elementary. In the face of climate change, the Project must implement climate adaptation strategies to ensure the safety of commuters and customs officers. The BOTA crossing, which serves everyone across El Paso and Juarez, should be a part of improving public health by tackling air pollution and improving the quality of life of communities near the port and its feeder highways.

II. Summary of the Proposed Project.

The San Xavier and Chamizal are special and unique communities in El Paso: keystones of El Paso's Mexican American heritage and imbued with a strong support network between neighbors. These communities are intrinsically linked to the BOTA by their proximity and are particularly sensitive to the foreseeable adverse impacts of the BOTA Project.

On November 13, 2023, GSA published its Notice of Intent for the proposed BOTA Port Modernization Project. GSA's Notice of Intent states that purpose of the proposed action is for GSA to "bring[] the BOTA LPOE [Land Port of Entry] infrastructure in line with current CBP

land port design standards…and operational requirements while addressing existing deficiencies identified with the ongoing port operations."[3] The NOI further describes the project need as "improv[ing] the capacity and functionality of the LPOE to meet future public demand, while maintaining the capability to meet border security initiatives," and "**ensur[ing] the safety and security for the employees and the travelling public.**"[4]

GSA received $9.9 million in funds through the Infrastructure Investment and Jobs Act, also known as the Bipartisan Infrastructure Law, a key measure of President Biden's administration that aims to rebuild the Nation's infrastructure, create jobs, support environmentally conscious manufacturing and innovation, bolster national security, support clean-energy, combat climate change, and increase community resiliency. [5] In December 2023, GSA awarded the contract for pre-design services for the project.[6] The funding for the BOTA is further supplemented by the Inflation Reduction Act, which allocated a total of $2 billion to GSA to reduce the carbon emissions of its buildings across the nation, including the BOTA.[7] GSA has correctly recognized that:

> The [BOTA] project is part of President Biden's Investing in America agenda in growing the American economy from the bottom up and middle-out – from rebuilding our Nation's infrastructure, to creating a manufacturing and innovation boom powered by good-paying jobs, to building a clean-energy economy that will combat climate change and make our communities more resilient.[8]

On December 13, 2023, GSA held its Public Scoping Meeting to discuss the currently proposed alternatives and obtain public comment on the project. GSA noted that its EIS would discuss direct, indirect, and cumulative effects, and identified the following as issues for analysis of the project's impacts:

- Hazardous Materials
- Waste, and/or Site Contamination

---

[3] General Services Administration, Notice-PBS-2023-04; docket No. 2023-0002; Sequence No. 23, Notice of Intent to Prepare an Environmental Impact Statement and Notice of Public Scoping Meeting and Comment Period.
[4] *Id* (emphasis added).
[5] General Services Administration, *GSA awards $10 Million for Pre-Design Services for Modernizing Facilities at the Bridge of the Americas Land Port of Entry*, December 26, 2023, https://www.gsa.gov/about-us/gsa-regions/region-7-greater-southwest/region-7-newsroom/greater-southwest-feature-stories-and-news-releases/gsa-awards-10-million-for-predesign-services-for-modernizing-facilities-at-the-bridge-of-the-americas-land-port-of-entry-12262023.
[6] *Id.*
[7] General Services Administration, *Biden-Harris Administration Announces $2 Billion for Cleaner Construction Projects to Tackle the Climate Crisis, Spur American Innovation, and Create Good-Paying Jobs as Part of Investing in America Agenda*, November 6, 2023, https://www.gsa.gov/about-us/newsroom/news-releases/bidenharris-administration-announces-2-billion-for-cleaner-construction-projects-to-tackle-the-climate-crisis-spur-american-innovation-and-create-goodpaying-jobs-as-part-of-investing-in-america-agenda-11062023#:~:text=TOPEKA%20%E2%80%93%20The%20U.S.%20General%20Services,Administration's%20Investing%20in%20America%20agenda.
[8] General Services Administration, *GSA awards $10 Million for Pre-Design Services for Modernizing Facilities at the Bridge of the Americas Land Port of Entry*, December 26, 2023, https://www.gsa.gov/about-us/gsa-regions/region-7-greater-southwest/region-7-newsroom/greater-southwest-feature-stories-and-news-releases/gsa-awards-10-million-for-predesign-services-for-modernizing-facilities-at-the-bridge-of-the-americas-land-port-of-entry-12262023.

- Socioeconomics (including Environmental Justice)
- Public Services, Infrastructure, and Utilities
- Surface Waters, Drainage, and Floodplains
- Land Use and Zoning (including Visual and Aesthetics)
- Traffic (Vehicular and Pedestrian), Transportation, and Parking
- Air Quality (including Greenhouse Gas Emissions)
- Noise and Vibration
- Cultural and Historic Resources[9]

GSA presented the public with six alternatives, including the No Action Alternative. Alternative 4 was the only alternative presented that would immediately and permanently remove heavy-duty diesel commercial truck traffic, with minimal land acquisition and the preservation of the County Coliseum. In contrast, every other alternative, excluding the No Action Alternative, would expand the BOTA eastwards towards the County Coliseum and seize portions of County land that are currently used for the benefit of El Paso communities.

GSA further discussed the project timeline, with publication of the Draft EIS expected in the summer of 2024.[10] In nearly every comment submitted to GSA at the December 13, 2023 Meeting, the public urged the removal of heavy-duty commercial traffic and spoke about the hardships of enduring constant diesel emissions from these trucks.

On January 22, 2024, Congresswoman Veronica Escobar and GSA hosted a Public Meeting for the Project, where the community voiced a unified message through shared experiences of living in the forefront of environmental pollution. Residents expressed the struggles of raising children afflicted with respiratory diseases or lung cancer, public schoolteachers spoke about the daily detrimental impact air pollution had on their students, and residents from the San Xavier and Chamizal community groups urged GSA to remedy their ongoing struggle of living under an incessant cloud of diesel emissions, noise, vibrations, and bearing witness to an increasing number of friends and neighbors passing away from cancer. Dr. Toni Ramirez, a public health doctor who serves Central El Paso residents, described how she witnessed the struggles discussed by residents in her daily practice, and voiced concern over the lack of resources to address the medical needs and resiliency of residents most impacted by air pollution.[11]

III. Legal Framework

A. Title VI of the Civil Rights Act.

Title VI serves as a critical bulwark against further discrimination in projects such as this one. Title VI's prohibition on discrimination applies to all recipients of federal funds: "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." 42 U.S.C. § 2000d. As a federal agency, GSA manages its day-to-day operations with federal funding, and relies on federal funding for its

[9] General Services Administration, December 13, 2023, NEPA Public Meeting Summary at 23.
[10] *Id.* at 24.
[11] Congresswoman Veronica Escobar's office informed participants that the public comments were being recorded.

projects. Because of this inextricable reliance on federal funding, GSA is obligated to comply with Title VI in all its programs or activities.[12]

Critically, GSA's Title VI implementing regulations provide that "[w]here previous discriminatory practice or usage tends, on the ground of race, color, or national origin, to exclude individuals from participation in, to deny them the benefits of, or to subject them to discrimination under any program or activity to which this subpart applies, *the applicant or recipient has an obligation to take reasonable action to remove or overcome the consequences of the prior discriminatory practice or usage*, and to accomplish the purposes of the Act.[13] Thus, because of the legacy of discriminatory practices impacting San Javier and Chamizal residents, GSA has an affirmative responsibility to not only avoid discriminating against these communities today, but also to overcome the legacy of past discrimination.

A disproportionate share of the families who live near the BOTA and its arterial highways are Hispanic or Mexican-American. A pattern of governmental decisions has placed Southside communities like San Xavier and the Chamizal at the forefront of environmental contamination. In recognition of this, the Chamizal community—west of San Xavier—has advocated for clean air since the passage of the North American Free Trade Agreement ("NAFTA") in 1994. The Chamizal community has voiced concerns to TXDOT, GSA, EPA, and local government authorities to take meaningful action to ameliorate air pollution, including by advocating for the removal of semi-trucks from Paisano Drive and the BOTA. In furtherance of this goal, residents of the Chamizal and San Xavier neighborhoods engaged in public participation throughout the TXDOT I-10 Connect Project, which removed the semis from Paisano Drive only to place them behind San Xavier. Both communities have been actively engaged in the BOTA Modernization Project, as have Southside community residents east of BOTA and community members from throughout the County.

If GSA allows for a continuation or increase in heavy-duty commercial truck traffic through its BOTA Project, it will authorize the continued pollution of the air that residents breathe, increasing fine particulate pollution associated with premature death and serious health problems. As explained in more detail below, the public health impacts of vehicular air pollution, particularly from heavy-duty diesel trucks, are widespread and severe.[14] The project also risks aggravating soil and water pollution from construction and continued operations at the BOTA. These are unacceptable harms for communities that have suffered from pollution and health problems from the port of entry, highways, busy roads, Marathon refinery, the EPISD bus hub, the EPWU water treatment plant, the covered (yet unabated) toxic landfill at Modesto Park, and other pollution sources for many decades. Should GSA fail to prevent further environmental degradation on the San Xavier and Chamizal communities, it risks violating Title VI of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000d to 2000d-7, as well as its own Title VI implementing regulations.[15]

[12] 42 U.S.C. § 2000d-4a.
[13] 41 C.F.R. § 101-6.204-2 (a)(1)(vi)(4).
[14] *See infra* at Section IV.F.1. Air Pollution Impacts.
[15] 41 C.F.R. Chapter 101 Subpart 101-6.2 et seq.

B. The National Environmental Policy Act.

The National Environmental Policy Act ("NEPA"), 42 U.S.C. § 4332 et seq., provides the congressionally mandated procedure for assessment of these impacts, and NEPA requires that these procedures be completed "at the earliest possible time," i.e., "before decisions are made and before actions are taken."[16] Accordingly, GSA cannot select final project plans for the BOTA Modernization project and obtain necessary permits until the NEPA process is completed, including preparation of an EIS.

An EIS must describe:

i. the environmental impacts of the proposed action;

ii. any adverse environmental effects which cannot be avoided should the proposal be implemented;

iii. alternatives to the proposed action;

iv. the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity; and

v. any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.[17]

An EIS must also describe the direct and indirect effects, and cumulative impacts of, a proposed action.[18] These terms are distinct from one another. Direct effects are "caused by the action and occur at the same time and place."[19] Indirect effects are also "caused by the action" and "are later in time or farther removed in distance, but are still reasonably foreseeable."[20] Indirect effects "may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effect on air and water and other natural systems, including ecosystems.[21]

Cumulative impacts are not causally related to the action. Instead, they are:

> The impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from

[16] 40 C.F.R. §§ 1501.2, 1500.1(b) (emphases added).
[17] 42 U.S.C. § 4332(C).
[18] 40 C.F.R §§ 1502.16, 1508.7, 1508.8; *Northern Plains Resource Council v. Surface Transportation Board*, 668 F.3d 1067, 1072-73 (9th Cir. 2011).
[19] 40 C.F.R. § 1508.1(g)(1).
[20] *Id.* § 1508.1(g)(2).
[21] *Id.*

> individually minor but collectively significant actions taking place over a period of time.[22]

The EIS must give each of these categories of effect due consideration.

Finally, while an EIS is being prepared GSA may take no action which would tend to "limit the choice of reasonable alternatives," or "tend[] to determine subsequent development."[23]

IV. NEPA Procedural Comments of Familias Unidas and San Xavier Residents.

A. GSA Must Select Alternative 4 and Remove Semis from the BOTA.

The alternatives analysis "is the heart of the environmental impact statement."[24] Federal agencies must take care not to define the project's purpose so narrowly as to prevent the consideration of a reasonable range of alternatives.[25] CEQ's regulations implementing NEPA, 40 C.F.R. § 1502.14, explain that a reasonable range of alternatives should be presented and compared in the EIS to allow for a "clear basis for choice among options by the decision maker and the public." In addition, CEQ's "Forty Most Asked Questions Concerning National Environmental Policy Act Regulations" explain that agencies must "[r]igorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated."[26]

Crucially, the alternatives must examine even those alternatives which may be outside the jurisdiction or capability of the agency or applicant.[27] Further, "[a] potential conflict with local or federal law does not necessarily render an alternative unreasonable, although such conflicts must be considered."[28] GSA must also include "appropriate mitigation measures not already included in the proposed action or alternatives."[29] Because alternatives are central to decisionmaking and mitigation, "the existence of a viable but unexamined alternative renders an environmental impact statement inadequate."[30] Should the agency only give an alternative threadbare analysis or ignore critical information pertaining to that alternative, the deficient analysis also renders an environmental impact statement inadequate.[31]

As such, the GSA must fully consider Alternative 4 and its removal of all heavy-duty commercial truck traffic from the POE in both directions, particularly because Alternative 4 emerged from the public's overwhelming demand—reiterated since the first BOTA public meeting in the fall of 2022—for an alternative that prioritizes public health. Including an alternative in the "alternatives analysis" is only the first step, however, and should GSA

---

[22] § 1508.1 (g)(3).
[23] 40 C.F.R. § 1506.1.
[24] 40 C.F.R. § 1502.14.
[25] *See, e.g.*, *Simmons v. U.S. Army Corps of Engineers*, 120 F.3d 664, 666 (7th Cir. 1997).
[26] CEQ, "Forty Most Asked Questions Concerning National Environmental Policy Act Regulations," at 3, https://www.energy.gov/nepa/articles/forty-most-asked-questions-concerning-ceqs-national-environmental-policy-act.
[27] Id. at 4.
[28] Id.
[29] Id.
[30] Id.
[31] *Utahns for Better Transp. v. U.S. Dep't of Transp.*, 305 F.3d 1152, 1170 (10th Cir. 2002), *as modified on reh'g*, 319 F.3d 1207 (10th Cir. 2003).

encounter challenges in the implementation of Alternative 4, it must in good faith consider potential resolutions. Indeed, it would be a clear violation of NEPA should GSA decline to dismiss Alternative 4 prematurely with no further consideration. Such dismissal would brazenly depart from what is reasonably feasible, especially given the fact that *GSA has full authority to remove and redirect commercial truck traffic from the BOTA*. There is also ample evidence that demonstrates that Alternative 4 is practicable.

1. Removing Semi Traffic from the BOTA is Feasible.

The BOTA is not the only land port of entry in the El Paso region that is currently equipped—and certainly not the port that is best equipped—to inspect commercial trucks and their cargo. There are three ports of entry in the region with capacity to handle commercial traffic: Ysleta, Santa Teresa, and Tornillo, all within 10-, 27-, and 40- miles of the BOTA, respectively. Further, the BOTA only operates its northbound commercial crossings from 6a.m. to 2p.m. and as such, cannot be considered a key LPOE in the region for commercial traffic.

With increased border pollution and unprecedented stalling of commercial traffic near the BOTA, GSA must conduct its own analysis on the strategies available to redirect both north- and southbound commercial truck traffic. The other POEs have already demonstrated reliability in absorbing the BOTA's commercial traffic. Since 2022, the BOTA's commercial lanes have been closed numerous times due to the surge in immigrant crossings, and semis were rerouted to other ports. As part of its Alternatives Analysis, GSA must review how these closures at the BOTA impacted other LPOEs and consider strategies to effectuate greater mobility and reduce idling at the BOTA by permanently implementing a similar diversion of truck traffic.

It makes eminent sense to redirect traffic to other POEs, especially Tornillo, given that the transportation infrastructure around the BOTA on both sides of the border was not built to handle heavy-duty truck traffic, while Tornillo was built with semis in mind and is currently the largest POE in El Paso. GSA must seriously consider how to redirect traffic to Tornillo, Ysleta, and Santa Teresa, and analyze how traffic flow can be improved, and the significant air pollution reductions that would flow from such relocations.

2. Local Governments have Already Agreed to Explore Using Technology at Another POE to Reduce Semi Traffic.

The sister cities of El Paso and Ciudad Juarez have recognized that they need to address the semi traffic at the ports of entry. In January of 2023, the two cities entered into a Memorandum of Understanding to promote the use of conveyor belt technology at the Ysleta POE to facilitate commercial traffic. GSA should collaborate with the City of El Paso and Juarez in moving forward on installing this technology at the Tornillo POE, given the success of conveyor belt technology in increasing operational efficiency.[32] Upon information and belief, truck drivers do not feel safe queuing on the Mexican side of the Tornillo POE as they wait to enter the U.S., due to cartel activity. However, conveyor belt technology would eliminate idling for northbound traffic and increase safety at the border. GSA must also explore any other actions it can take to improve safety at the Tornillo Bridge and facilitate crossings, including through collaborations with U.S. and Mexican authorities. Unlike the BOTA, the Tornillo Bridge was

[32] CHIA, Benefits of Conveyor Belts in the Port Sector, September 19, 2023, https://espirales.es/notice/benefits-of-conveyor-belts-in-the-port-sector.

built with increased capacity to handle heavy-duty commercial traffic and was meant to help remove congestion from the BOTA.[33] As part of its analysis of alternatives, GSA should rigorously explore options to maintain the Tornillo POE running. GSA should also consider the implementation of conveyer belt at Ysleta and Santa Teresa.

3. The Area Surrounding the BOTA has a Denser Population of People than the Other POEs.

Over 9,300 residents live in the three census tracts immediately adjacent to the BOTA, according to the 2020 U.S. Census. The census tracts surrounding the port of entry in Tornillo and Santa Teresa have less than half of those residents, and the neighborhoods are further removed from the border crossings, which mitigates any adverse impacts of traffic and reduces the likelihood that residents will be replaced if there is a need to expand the POE. Even more, the port of entry at Santa Teresa has nearby warehouses and industrial infrastructure that could facilitate commercial truck traffic, and the Tornillo POE has increased capacity to facilitate mobility. We urge GSA to explore these options with careful attention to the impacts of rerouting the trucks. Care should be taken to avoid impacting other environmental justice communities with the relocation of semis. Again, the use of conveyor belt and other technology to improve efficiency would minimize the impact of semi traffic at all the POEs.

B. GSA Must Select Alternative 4 to Comply with the Environmental Goals of the Bipartisan Infrastructure Act and Inflation Reduction Act.

Given the fact that the source of the GSA's funding for the project is rooted in federal laws intended to advance environmental justice and reduce GHG emissions, GSA has a duty to integrate the principles of the Bipartisan Infrastructure Act and IRA into its selected alternative. GSA risks violating its duties imparted by the Bipartisan Infrastructure Act and IRA funds should it select an alternative that allows for a continuation and potential increase of vehicular air emissions, which is an outcome that would be set in stone should GSA reject Alternative 4. Even more, GSA would not accomplish its stated goals of "reducing greenhouse gas emissions," "mitigating human health and environment impact,"[34] and "**ensur[ing] the safety and security for the employees and the travelling public**"[35] through the BOTA Project if it allows heavy-duty commercial traffic to continue to cross on the BOTA. While GSA's commitment to use lower carbon materials in the Project is a notable step in the right direction, this alone will not satisfy the agency's responsibilities under federal law.

Both the Bipartisan Infrastructure Act and IRA aim to reduce U.S. GHG emissions and ameliorate the disproportionate impacts that the country's longstanding reliance on fossil fuels have had on communities of color and low-income communities. The Bipartisan Infrastructure Act was passed to boost American infrastructure with an environmentally forward approach. The Bipartisan Infrastructure Act is intended to "rebuild America's roads, bridges and rails, expand access to clean drinking water, ensure every American has access to high-speed internet, tackle

---

[33] Lorena Figueroa, *Tornillo-Guadalupe Bridge is Now Open*, EL PASO TIMES, February 4, 2016, https://www.elpasotimes.com/story/news/2016/02/04/new-tornillo-guadalupe-bridge-inaugurates/79849438/.
[34] GSA, *GSA Awards $10 Million for Pre-Design Services for Modernizing Facilities at the Bridge of the Americas Land Port of Entry*, December 26, 2023, https://www.gsa.gov/about-us/gsa-regions/region-7-greater-southwest/region-7-newsroom/greater-southwest-feature-stories-and-news-releases/gsa-awards-10-million-for-predesign-services-for-modernizing-facilities-at-the-bridge-of-the-americas-land-port-of-entry-12262023.
[35] *Id* (emphasis added).

the climate crisis, advance environmental justice, and invest in communities that have too often been left behind."[36]

The IRA funding provided to modernize ports of entry is specifically conditioned on infrastructure efforts aimed at reducing air pollution.[37] The IRA pushes for the installation of zero emissions equipment and technology at the ports, the development of climate action plans, and the granting of funds to communities near ports that breathe disproportionately high levels of toxic pollutants.[38] The IRA provides additional funding for those ports that are located in areas of nonattainment for any air pollutant, a provision which GSA should take advantage of given El Paso's nonattainment of ozone and PM2.5 pollution.[39] GSA cannot reject the environmental goals of the IRA to view the BOTA Modernization in a climate vacuum and not seize clear opportunities to reduce or eliminate sources of GHG emissions. Accordingly, GSA must select Alternative 4, as it is the only alternative that conforms with the goals of the Bipartisan Infrastructure Act and IRA.

C. GSA Must Evaluate the Economic Benefit and Harm of Each Alternative, Including Alternative 4.

NEPA requires that GSA "take a hard look at the environmental consequences" of a proposed action.[40] To satisfy this mandate, GSA must carefully discuss all the benefits of reducing air pollution—as well as the harms of not doing so—in its EIS. GSA cannot give greater weight to the economic benefits of commercial crossings—for example, by monetizing the trade benefits—without also giving fair weight to the harms, and similarly quantifying those harms. Crucially, GSA must evaluate the far-reaching health and economic benefits of removing heavy-duty commercial truck traffic from the BOTA and, conversely, examine the harms of allowing semis to continue to corrode air quality.

The data shows that mitigating air pollution produces astronomical economic benefits. According to a 2019 study, poor air quality may cost the U.S. about $886 billion a year.[41] Just recently, on February 7, 2024, the EPA took a major step to protect communities by strengthening the national ambient air quality standard for PM 2.5, which the agency estimated to produce $46 billion in net health benefits by 2032.[42] This is just one of many examples that highlights the immense benefits of reducing the emissions of a single air pollutant. When considering the wide array of pollutants in diesel emissions, the elimination of heavy-duty commercial traffic and its toxic emissions would produce vast economic benefits—including a reduction of asthma attacks, hospitalizations, emergency room visits, missed school- and work

---

[36] White House, Statements and Releases: Fact Sheet: The Bipartisan Infrastructure Deal, November 6, 2021, https://www.whitehouse.gov/briefing-room/statements-releases/2021/11/06/fact-sheet-the-bipartisan-infrastructure-deal/.
[37] 42 U.S.C.A. § 7433, Sec. 133. Grants to Reduce Air Pollution at Ports.
[38] *See id.*
[39] *Id*.
[40] *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 350, 109 S.Ct. 1835, 104 L.Ed.2d 351 (1989) (quoting *Kleppe v. Sierra Club*, 427 U.S. 390, 410, 96 S.Ct. 2718, 49 L.Ed.2d 576 (1976)).
[41] Andrew L. Goodkind et al., *Fine-Scale Damage Estimates of Particulate Matter Air Pollution Reveal Opportunities for Location-Specific Mitigation of Emissions*, 116 PNAS 18 (April 8, 2019), https://www.pnas.org/doi/10.1073/pnas.1816102116.
[42] EPA, *EPA Finalizes Stronger Standards for Harmful Soot Pollution, Significantly Increasing Health and Clean Air Protections for Families, Workers, and Communities*, February 7, 2024, https://www.epa.gov/newsreleases/epa-finalizes-stronger-standards-harmful-soot-pollution-significantly-increasing.

days, and fewer deaths from cardiopulmonary diseases and cancer, among other diseases and ailments linked to vehicular air pollution.

If GSA implements a rerouting strategy, removing heavy-duty commercial truck traffic can also produce savings in reduced fuel consumption and wear and tear by the trucks themselves. The costs of any added mileage pale in comparison to the potential fuel and repair savings from reduced idling. Idling for more than ten seconds consumes more fuel than turning off and restarting an engine, reduces engine life by up to 20%.[43] Heavy-duty diesel trucks consume at least half a gallon of diesel per hour, with nearly an entire gallon consumed depending on the type of truck.[44] And an hour of idling is approximately equivalent to 30 miles of driving for the strain placed on the engine.[45] GSA must take these considerations into account and factor in the benefits of removing trucks from the BOTA—where they inevitably idle and bottleneck for hours on end—and towards the Santa Teresa, Ysleta, and Tornillo bridges, which have greater capacity, infrastructure, and operating hours to allow for an efficient flow of commercial traffic.

GSA must also fully consider the economic detriment of allowing a continuation of—and possible increase of—commercial traffic. All Alternatives except for Alternative 4 and the No Action Alternative allow for immediate continuation—and possibly even expansion—of heavy-duty commercial traffic. Some of GSA's alternatives also propose purchasing county property and bringing the semi traffic closer to residences and community centers. GSA must also analyze the loss of revenue in the form of tolls from commercial traffic since 1994 and then project the future loss of tolls for at least another 30 years if the semis are not removed from BOTA.

All but one of GSA's proposed alternatives continue to rely on outdated and unjust traffic management that adheres to a decades-long pattern of systemic discrimination and environmental degradation. On December 7, 2023, the residents of San Xavier filed a Title VI Civil Rights complaint against TXDOT due to the I-10 Connect Project, which leads into the BOTA and failed to deliver on its promise of accelerating traffic into Mexico. When GSA's longstanding practice of allowing commercial traffic at ports of entry near residential neighborhoods is considered in tandem with TxDOT's perpetuation of the pollution associated with this traffic,[46] the disservice to the public interest is not only evident but egregious. The harms are widespread: mobile source emissions are linked to severe environmental degradation and increased mortality and illness in nearby communities, with disproportionate burdens on communities of color and Texans below the poverty line.[47]

---

[43] TranBC, *Leading the Way in Border Greenhouse Gas Reduction*, https://www.tranbc.ca/2013/08/06/leading-the-way-in-border-greenhouse-gas-reduction/.
[44] U.S. Department of Energy, *Vehicle Technologies Office, Fact #861 February 23, 2015 Idle Fuel Consumption for Selected Gasoline and Diesel Vehicles*, https://www.energy.gov/eere/vehicles/fact-861-february-23-2015-idle-fuel-consumption-selected-gasoline-and-diesel-vehicles.
[45] Steven Lang, *How Many Miles Is Too Many for a Used Diesel Pickup Truck?*, Capital One, March 7, 2023, https://www.capitalone.com/cars/learn/finding-the-right-car/how-many-miles-is-too-many-for-a-used-diesel-pickup-truck/2145.
[46] Exhibit A, TRLA, TRLA Title VI Complaint.
[47] *See* Section IV.F.1. Air Pollution Impacts.

D. GSA Must Evaluate the Feasibility of Enhancing Public Transportation and Green Mobility Strategies at the BOTA.

In addition to removing the commercial trucks with Alternative 4, GSA must amplify and enhance existing public transportation at the BOTA and create new modes of public transportation for local commuters (a light rail, trolley, and/or a public bus system). Public transportation can improve operational efficiency through environmentally friendly and community-oriented strategies. GSA must pursue potential collaborations with the City of El Paso, Cd. Juarez, and TxDOT to maximize the benefits of public transportation. Currently, much of the public transportation at the POE consists of passenger buses coming from different regions in Mexico to the United States. However, most of the crossings at the BOTA consist of daily and frequent commuters that live in the El Paso-Juarez region and fuel the El Paso-Juarez economy. Thus, it is vital to provide adequate public transportation for these commuters and encourage pedestrian traffic over vehicular traffic from Juarez to El Paso.

We encourage GSA to enhance the availability and accessibility of public transportation options for pedestrians who have crossed the border. Usually, when pedestrians cross at the BOTA, they must embark on a harrowing journey across highways with poorly marked or completely absent traffic safety signs and signals. Dozens of students living in Juarez and attending school in El Paso must make this dangerous journey every day. GSA can help minimize this unacceptable risk to pedestrians by creating infrastructure that allows City of El Paso buses to stop at or near the BOTA and park-and-rides on both sides of the BOTA. Currently, the closest bus stop to the BOTA appears to be nearly a mile away, leaving pedestrian traffic bereft of practicable options.[48]

GSA should speak with the City of El Paso and Cd. Juarez to strategize efforts based on current data; these efforts must include surveys of daily commuters and the routes they take on both sides of the border so that an effective public transportation plan can be implemented. GSA should also collaborate with the City of El Paso to facilitate public transportation at the BOTA, especially in light of the City's current efforts in drafting a Climate Action Plan. Revenue generated from the public transportation system on the BOTA can be reinvested into the public transit system. Even more, public transportation can be provided during a trial period as a way to encourage drivers to learn to use the system.

GSA can also take common-sense solutions to reduce the emissions from public transportation at the border, regardless of whether the mode of transportation is a trolley, monorail, or bus. For example, GSA can require bus drivers to turn the motor off while passengers are going through customs, at least during seasons without extreme heat. In addition, the creation of a pedestrian lane exclusively for public transportation passengers would help increase operational efficiency and improve pedestrian traffic. Such a strategy has already been proposed at the San Ysidro border crossing.[49] GSA can also expedite the processing by implementing the use of transportable electronic scanners and canine officers to process

[48] Moovit, How to Get to Free Bridge – Cordova Americas in El Paso by Bus?, https://moovitapp.com/index/en/public_transit-Free_Bridge_Cordova_Americas-El_Paso_TX-site_36699807-2783.
[49] Alexandra Mendoza, *Mexico Considering a Dedicated Lane for Trolley Passengers at the San Ysidro Border Crossing*, The San Diego Uion-Tribune, February 9, 2023, https://www.sandiegouniontribune.com/news/border-baja-california/story/2023-02-09/baja-california-proposes-an-exclusive-crossing-lane-for-trolley-users-at-the-san-ysidro-border.

pedestrian traffic using public transportation instead of concentrating inspections in one location at the customs booth, leading to longer pedestrian lanes.

In evaluating these public transportation strategies, GSA must fully consider the extent of the benefits offered in enhancing public transportation. Most notably, increased public transportation reduces traffic congestion and helps reduce air pollution, producing immense public health and economic benefits.[50] Public transportation also helps increase the mobility of disadvantaged communities and reduce unemployment in low-income urban areas.[51] Expanded access to public transportation in the cross-border context also creates a positive economic impact through the increased mobility of cross-border shoppers.[52]

GSA should also consider the role public transportation can play in ensuring that any induced development and induced demand—a natural risk and foreseeable impact from expanding vehicular capacity—occurs without inducing increased air pollution. Increased traffic and development often follow the heels of additional roadway capacity,[53] putting already vulnerable communities at further risk of environmental contamination and displacement. But with a strong public transportation system, the benefits that flow from development can be equitable, and historically rejected communities can benefit from growth instead of carrying the burdens of development alone.

E. Additional Strategies to Reduce Air Pollution.

GSA should consider implementing a dedicated commuter lane ("DCL") or two at the BOTA and rolling out a "batching" strategy. DCLs have the potential to accelerate traffic heading north exponentially. Currently, the BOTA does not have a DCL and commuters to and from Juarez who would like to use the center of the cities must rely on the Stanton DCL located in Segundo Barrio.

GSA should also consider the feasibility of a "batching" strategy at the BOTA to reduce idling and air pollution. "Batching" is the process of moving traffic up to the customs booth in batches with the use of light signals, with those batches of vehicles furthest from the customs booth encouraged to turn off their vehicle engines.[54] The benefits of "batching" improve fuel efficiency, increase the life of vehicle engines by up to twenty per cent, and significantly reduce

---

[50] *See infra* Section IV.F.1. Air Pollution Impacts.
[51] Kai A. Schafft and Robin Blakely, *Local Residential Mobility as a Dimension of Rural Disadvantage*, 2005 ANNUAL MEETING OF THE POPULATION ASSOCIATION OF AMERICA (2005), https://paa2005.populationassociation.org/papers/50719; Mark Alan Huges, *A Mobility Strategy for Improving Opportunity*, 6(1) HOUSING POLICY DEBATE 271 (1995), https://scholar.archive.org/work/mnagx4veovadxgekj6zuibfbiu/access/wayback/https://www.drexel.edu/greatworks/Theme/Fall/~/media/Files/greatworks/pdf_FL10/WK4_1_Hughes_1995.ashx; Paul M. Ong et al., REPORT: MOBILITY, ACCESSIBILITY AND DISADVANTAGED NEIGHBORHOODS: ASSESSING DIVERSITY IN TRANSPORTATION-RELATED NEEDS AND OPPORTUNITIES, PACIFIC SOUTHWEST REGION UNIVERSITY TRANSPORTATION CENTER (June 2021), https://knowledge.luskin.ucla.edu/wp-content/uploads/2022/07/ca21-3431-finalreport-a11y.pdf.
[52] Adam Gregory Walke, M.A., Transit in a Border Zone: The Demand for Public Transportation in Three Texas Border Cities, University of Texas at El Paso (December 2011), https://scholarworks.utep.edu/cgi/viewcontent.cgi?article=3412&context=open_etd.
[53] Transportation for America, REPORT: THE CONGESTION CON: HOW MORE LANES AND MORE MONEY EQUALS MORE TRAFFIC (March 2020), available at https://t4america.org/maps-tools/congestion-con/.
[54] TranBC, *Leading the Way in Border Greenhouse Gas Reduction*, https://www.tranbc.ca/2013/08/06/leading-the-way-in-border-greenhouse-gas-reduction/.

vehicle wear. Batching was successfully implemented at the Canadian-American Peach Arch crossing, where vehicles 200 meters or further from the customs booth would get a red traffic light until nearly all vehicles in the batch ahead were cleared. The strategy resulted in an estimated 45% reduction of GHG emissions, fuel savings, and no impact on the amount of overall time to cross the border.[55]

GSA must seriously consider implementing "batching" at the BOTA, at least during seasons where border crossers are not exposed to excessive heat. Should GSA reject consideration of "batching" as a strategy to aid in promoting public health and reducing noxious air contamination, it must explain why consideration of "batching" would not contribute to informed decisionmaking.[56] As with any response to public comments, GSA cannot simply assert that such analysis is "not required."[57]

F. GSA Must Consider the Full Extent of Environmental Justice Impacts from the Project.

Under NEPA, "environmental justice is not merely a box to be checked," and agencies are required to thoroughly evaluate the environmental justice impacts of a proposed project, and to inform communities of all potential impacts."[58] CEQ's NEPA Guidelines specify:

> Where a potential environmental justice issue has been identified by an agency, the agency should state clearly in the EIS or EA whether, in light of all the facts and circumstances, a disproportionately high and adverse human health or environmental impact on minority populations, low-income populations, or Indian tribe is likely to result from the proposed action and any alternatives. This statement should be supported by sufficient information for the public to understand the rationale for the conclusion.[59]

Even more, a 1994 Executive Order requires federal agencies, "[t]o the greatest extent practicable and permitted by law," to "make achieving environmental justice [("EJ")] part of [their] mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."[60] GSA has recognized this principle, and in 2011, the Administrator of the GSA signed a Memorandum of Understanding on Environmental Justice and Executive Order 12898, committing to identify and address:

> [A]ny disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority populations and low-income populations, including, but not limited to, as appropriate for its mission, in the following areas: (1) implementation of the National Environmental Policy Act; (2) implementation of Title V

---

[55] *Id.*
[56] *WildEarth Guardians v. Bernhardt*, 502 F. Supp. 2d 237, 255-56 (D.D.C. 2020).
[57] *See id.*
[58] *Friends of Buckingham v. St. Air Pollution Control Bd.*, 947 F.3d 68, 91–92 (4th Cir. 2020).
[59] Council on Environmental Quality, *Environmental Justice: Guidance Under the National Environmental Policy Act*, at 15.
[60] Exec. Order 12,898 § 1-101, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, 59 Fed. Reg. 7629 (Feb. 11, 1994).

of the Civil Rights Act of 1964, as amended; (3) impacts from climate change; and (4) *impacts from commercial transportation and supporting infrastructure[.]*[61]

When agencies seek to enlarge or extend highways, they must grapple with the context: infrastructure is where it is often for discriminatory reasons; expanding these systems may disparately burden the same communities, who continue to live along the same thoroughfares. While El Paso is a majority-minority city, communities like the Chamizal and San Xavier neighborhoods—which are nearly 100% people of color and have higher concentrations of foreign-born residents—are disproportionately burdened by air pollution stemming from the discriminatory siting of railroads, highways, industries, international ports of entry, and cross-border air pollution centuries in the making.[62]

El Paso was not exempt from Jim Crowe discrimination, and the effects are felt to this day. Here as across the country, highways were constructed around and through Black and Hispanic communities to cement segregation. The discriminatory practices of redlining laid the groundwork for future highway sitings.[63] In 1963, when the Chamizal Convention led to the displacement of Hispanic people and the creation of the current BOTA, the environmental burden of heavy truck traffic at the border crossing fell on the same communities targeted by explicit redlining discrimination.

1. Air Pollution Impacts.

As already noted, because the BOTA Modernization is funded through the Bipartisan Infrastructure act and IRA, there is an inextricable duty for GSA to reduce and mitigate air pollution. The availability of additional IRA funds allocated for community air pollution monitoring creates an incredible opportunity for GSA to evaluate the local impacts of mobile air pollution on the communities most impacted by air pollution from the BOTA, including the San Xavier and Chamizal communities. These communities are exposed to disproportionately high mobile source air emissions due to the traffic flow heading to and from the BOTA, including from 18-wheelers. GSA must analyze existing information on the state of air quality and impacts from the BOTA on communities, but also conduct its own studies to ensure that it makes a fully informed decision with the BOTA Project.

El Paso is marked by excessive levels of pollution. According to a 2020 report, El Pasoans were breathing air with elevated levels of pollution on one out of every three days last year.[64] The report measured days with elevated levels of small particulate matter and elevated ozone. The El Paso area had 78 days with elevated small particulate matter and 68 days of elevated ozone.[65] The American Lung Association currently ranks El Paso as the 14th worst

---

[61] GSA, *Memorandum of Understanding (MOU) on Environmental Justice* and *Executive Order 12898 (MOU on Environmental Justice*, August 4, 2011 (emphasis added), available at https://www.gsa.gov/system/files/MOU_Environmental_Justice.pdf.

[62] *See* Isa Gutierrez et al., *'Like a Dumping Ground': Latina moms in Texas border city are fighting air pollution*, NBC NEWS (Feb. 22, 2022), available at https://www.nbcnews.com/news/latino/-dumpingground-latina-moms-texas-border-city-are-fighting-air-polluti-rcna16789.

[63] Exhibit A, TRLA Title VI Complaint at 7-10 (discussing the history of environmental racism in Southside El Paso communities like San Xavier).

[64] Environment Texas, Report: Trouble in the Air: Millions of Americans Breathed Polluted Air in 2020, October 5, 2021, available at https://environmentamerica.org/texas/resources/trouble-in-the-air/.

[65] *Id.*

metropolitan area for high ozone days, and the 35th worst for 24-hour particle pollution—as compared to over two hundred other metropolitan areas.[66] In order to comply with NEPA, GSA must analyze the impacts of air pollution on communities near the BOTA, including the San Xavier and Chamizal communities, two communities besieged by decades of environmental racism and disproportionately high levels of environmental contamination.

GSA must use the modernization of the BOTA as an opportunity to put decades of research into practice. GSA must look to studies on air quality conducted at ports of entry, including the BOTA and in the El Paso region. Over $8 million has been spent studying air pollution in the region, based on the CV of only on one of the top researchers on the topic, Dr. WenWhai Li. This research also includes the work of Dr. Hector A. Olvera, who, among other studies, conducted a study on ultrafine particulate matter pollution at the BOTA. GSA must include an analysis of the impacts of vehicular air pollution in its EIS that fully examines available studies on air quality conducted at ports of entry, including the BOTA POE.[67] For GSA to fulfill its duty under NEPA to fully inform itself of the air quality impacts of the project, it cannot ignore local studies on air quality.

Crucially, GSA must analyze the significant dangers posed by diesel and ultrafine particulate matter pollution at and near the BOTA. EPA has classified diesel exhaust as a likely carcinogen, and the National Institute for Occupational Safety and Health has classified diesel exhaust as a potential carcinogen.[68] Motor vehicle emissions—and especially diesel emissions--often constitute the most significant source of ultrafine particles (diameter <0.1 m) in an urban environment.[69] The highest concentrations are closest to highways, POEs, etc., and dissipate with distance.[70] Exposure to diesel-emitted particles has been linked to increased cancer risk and cardiopulmonary diseases. Because of their size (<100 nm), exposure to ultrafine particles ("UFPs") emitted from heavy-duty diesel vehicles ("HDDV") might result in greater health risks than those associated with larger particles.[71] A 2013 study found that "[c]ommercial traffic, mostly composed of HDDV, heavily influenced UFP concentrations in the BOTA vicinity."[72] The study also found that on Sundays, when commercial traffic was absent, the UFP numbers were the lowest. Populations near the BOTA's traffic zone and within 400 meters are exposed to UFP's above the background level and include residents on both sides of the border, including a church

[66] American Lung Association, State of the Air: El Paso-Las Cruces, TX-NM, https://www.lung.org/research/sota/city-rankings/msas/el-paso-las-cruces-tx-nm.
[67] We specifically recommend that GSA consider the numerous studies performed by When Wai Li, Hector Olvera Alvarez, and Penelope J.E. Quintana. When Wai Li's CV with a list of publications is included as Exhibit E: When Wai Li CV. A list of Hector Olvera Alvarez's publications is available at https://www.ohsu.edu/people/hector-olveraalvarez-phd-pe. A list of Penelope J.E. Quintana's publications is available at https://scholar.google.com/citations?user=Qs4riTkAAAAJ&hl=en.
[68] American Cancer Society, Diesel Exhaust and Cancer Risk, last revised July 27, 2015, https://www.cancer.org/cancer/risk-prevention/chemicals/diesel-exhaust-and-cancer.html#:~:text=The%20EPA%20classifies%20diesel%20exhaust,a%20%E2%80%9Cpotential%20occupational%20carcinogen.%E2%80%9D.
[69] EPA, Study of Ultrafine Particles Near a Major Highway with Heavy-Duty Diesel Traffic, https://cfpub.epa.gov/si/si_public_record_Report.cfm?Lab=NCER&dirEntryId=83813.
[70] *Id.*
[71] Hector A. Olvera, Mario Lopez, Veronica Guerrero, Humberto Garcia and Wen-Whai Li., *Ultrafine Particle Levels at an International Port of Entry Between the US and Mexico: Exposure Implications for Users, Workers, and Neighbors*, 23 Journal of Exposure Science and Environmental Epidemiology 289 (2013), attached as Exhibit B.
[72] *Id.*

and several schools, law enforcement officers, street vendors, private commuters, and commercial vehicle drivers."[73]

Another recent study examined the short-term associations (24-, 48-, 72-, and 96-hr averages) of traffic-related air pollutants (PM2.5, PM10, NO2, and O3) with biomarkers of respiratory and cardiovascular disease in a group of uninsured participants from low-income communities in El Paso.[74] Researchers found associations of short-term air pollutant concentrations with respiratory outcomes, which was expected.[75] However, researchers also found associations with metabolic risk factors such as BMI, waist circumference, and fasting glucose.[76] The study also found a correlation between PM2.5 and NO2 and respiratory risk of chronic obstructive pulmonary disease.[77]

There is also research that highlights the increased air pollution present at US-Mexico ports of entry. A 2014 study investigated the effect of long northbound traffic delays at the San Ysidro POE and found consistently higher concentrations of toxic pollutants (ultrafine particulate matter (UFP), black carbon (BC), and particulate matter <2.5 μm in diameter (PM2.5)).[78] This study also emphasized that "[d]isparaties in traffic exposures an environmental justice issue and this should be taken into account during planning and operation of POEs."[79]

Even more, traffic at the BOTA contributes to dangerous levels of ozone pollution. Jason Sarate, who oversees the city of El Paso's Air Quality Program stated, "[o]ne of the largest contributing sources to ozone in El Paso is the vehicle emissions. I think the biggest challenge is the vehicles that are idling for multiple hours at our ports of entry. When you have vehicles and semi-trucks lined up on the freeways waiting to cross into Mexico or cross into El Paso, those are real issues."[80]

GSA must also account for the impacts of PM2.5 pollution at the BOTA. PM2.5 kills nearly 50,000 people in the United States every year, with disproportionate impacts on communities of color.[81] On February 7, 2023, the EPA strengthened the National Ambient Air Quality Standards ("NAAQS") for PM2.5 from 12 micrograms per cubic meter to 9 micrograms

---

[73] *Id.*
[74] Soyoung Jeon, Association of Traffic and Related Air Pollutants on Cardiorespiratory Risk Factors from Low-Income Populations in El Paso, TX (February 2021), available at https://www.carteeh.org/wp-content/uploads/2021/06/03-27-UTEPAssociation-of-Traffic-and-Related-Air-Pollutants-on-Cardiorespiratory-Risk-Factors-from-Low-Income-Populations-in-El-Paso-TX-Jeon.pdf.
[75] *Id.*
[76] *Id.*
[77] *Id.*
[78] Penelope J.E. Quintana et al., Traffic-Related Air Pollution in the Community of San Ysidro, CA, in relation to Northbound Vehicle Wait Times at the US-Mexico Border Port of Entry, 88 Atmospheric Environment 353 (May 2014)
[79] *Id.*
[80] El Paso, Las Cruces rank high in ozone pollution in 2023 report, El Paso Matters, April 2023, available at https://elpasomatters.org/2023/04/25/el-paso-texas-american-lung-association-ozone-pollution-f-grade-2023/#:~:text=El%20Paso%20recorded%2040%20unhealthy,days%20than%20the%20previous%20year.
[81] https://earthjustice.org/brief/2024/soot-pm2-5-pollution-standard-stronger-biden

per cubic meter.[82] This designation automatically placed El Paso in nonattainment for PM 2.5,[83] adding to El Paso's ongoing nonattainment for the 8-hour ozone standard[84] and PM 10.[85] We recommend that GSA look into studies by the Joint Advisory Committee, including the Committee's most recent 2024 Air Quality Report, as these specifically look into the state of air pollution in the Paseo del Norte air basin.[86]

GSA must also examine the impacts of air pollution from highways on neighboring communities, as these highways are inextricably linked to the BOTA and its impacts. Numerous studies have shown that pollution from highways is very localized. For example, studies have shown that living in close proximity to highways causes a significantly elevated exposure to a complex mixture of pollutants including air toxics, diesel particulate matter, and other highway emissions including tire wear, brake wear, resuspended road dust, and various metals.[87] GSA must evaluate the community risk to adverse health impacts from highway traffic, including, but not limited to:

- Asthma and bronchitis: exposure to diesel exhaust can induce histamine releases that result in allergic conjunctivitis, rhinosinusitis, pharyngitis, laryngitis, and chronic cough. This exposure can also lead to degradation of lung tissue.[88] Children are especially vulnerable to chronic negative respiratory issues, as living in close proximity to highway traffic can inhibit lung development during childhood and lead to lifelong weakened lung function.[89]
- Negative cardiovascular effects: long-term exposure to air pollution from high traffic has been shown to increase incidences of coronary artery calcification[90] as well as increased coronary heart disease and strokes in women.[91]
- Adverse birth outcomes and developmental effects: living in close proximity to heavy-traffic roadways can cause an increase in term low birth weight and preterm infants.[92]

---

[82] EPA, *EPA Finalizes Stronger Standards for Harmful Soot Pollution, Significantly Increasing Health and Clean Air Protections for Families, Workers, and Communities*, February 7, 2024, https://www.epa.gov/newsreleases/epa-finalizes-stronger-standards-harmful-soot-pollution-significantly-increasing.

[83] El Paso has an average PM2.5 level of 9.2 $\mu g/m^3$, which places the County above EPA's newer standard. Earthjustice, Mapping Soot and Smog Pollution in the United States, February 7, 2024.

[84] El Paso continues to struggle with ozone attainment issues, and has violated the ozone NAAQS every year since 2016.

[85] Soyoung Jeon, Association of Traffic and Related Air Pollutants on Cardiorespiratory Risk Factors from Low-Income Populations in El Paso, TX (February 2021), available at https://www.carteeh.org/wp-content/uploads/2021/06/03-27-UTEPAssociation-of-Traffic-and-Related-Air-Pollutants-on-Cardiorespiratory-Risk-Factors-from-Low-Income-Populations-in-El-Paso-TX-Jeon.pdf.

[86] See Exhibit C, JAC Paseo Del Norte Air Quality Report.

[87] U.S. Environmental Protection Agency, Near-Road Air Quality Monitoring Research (Nov. 3, 2009).

[88] Irina N. Krivoshto et al., *The Toxicity of Diesel Exhaust: Implications for Primary Care*, J. AM. BOARD FAM.MED. 55, 58 (2008).

[89] W. James Gauderman et al., *Effect of Exposure to Traffic on Lung Development From 10 to 18 Years of Age: A Cohort Study*, THE LANCET 571, 574 (Jan. 26, 2007).

[90] B. Hoffman et al., *Residential Exposure to Traffic is Associated with Coronary Atherosclerosis*, 116 CIRCULATION 489 (2007).

[91] Kristin A. Miller et al., *Long-Term Exposure to Air Pollution and Incidence of Cardiovascular Events in Women*, 356 NEW ENG. J.MED. 447, 453-56 (2007).

[92] Michelle Wilhelm & Beate Ritz, *Residential Proximity to Traffic and Adverse Birth Outcomes in Los Angeles County, California, 1994-1996*, 111 ENVTL. HEALTH PERSP. 207, 210-11 (2003).

- Premature mortality: epidemiological surveyors have discovered high acute and chronic respiratory disease morbidity rates from proximity exposure to diesel exhaust, as well as incidences of acute coronary syndrome (heart attacks) and ischemic effects (strokes).[93]
- Increased incidences of cancer: many emissions released by heavy traffic flow, such as diesel exhaust fumes and particulate matter, have carcinogenic properties.[94]

The San Xavier and Chamizal communities breathe dangerous levels of pollution in their daily lives, and the severity of this fact cannot be written off with a brief summation of environmental justice.[95] GSA must acknowledge and evaluate the various incommensurable harms posed by the proximity of these communities to the highways that feed the BOTA, and the immense public benefit of protecting communities from pollution.

GSA must also account for the impacts of air pollution at the BOTA on those crossing the bridge and the Customs and Border Protection ("CBP") officials working on the bridge. CBP officials at the bridge must endure long workdays with constant exposure to the toxic air pollution. Due to an increased volume of traffic and prolonged wait times, individuals and families crossing the BOTA north and south are exposed to dangerously high concentrations of toxic air pollutants for hours on end. Studies have shown that air quality inside vehicles idling at border crossings contains higher concentrations of toxic pollutants,[96] and pedestrians standing in lines at the border face increased exposure to increased levels of air pollution.[97]

GSA must also conduct local air quality monitoring to assess the current impact of vehicular emissions on the BOTA, and the San Xavier and Chamizal neighborhoods. It is critical that GSA examine the air quality data provided by TCEQ monitors and PurpleAir sensors,[98] but also conduct its own air quality monitoring that focuses on impacts in the project area, especially during peak idling hours. Crucially, GSA must analyze air pollution impacts in the context of TXDOT's recent I-10 Connect project, as air monitoring data taken before the historic

---

[93] Irina N. Krivoshto et al., *The Toxicity of Diesel Exhaust: Implications for Primary Care,* J. AM. BOARD FAM.MED. 55, 56-59 (2008).

[94] Rachel A. Morello-Frosch, Tracey J. Woodruff, Daniel A. Axelrad, Jane C. Caldwell, *Air Toxics and Health Risks in California: The Public Health Implications of Outdoor Concentrations*, Risk Analysis, 20 (2) RISK ANALYSIS, February 2000 (predicting 8600 excess cancer cases).

[95] TxDOT has included only a brief discussion of environmental justice, displaying the quintessential "box to be checked" attitude that contravenes NEPA's informed decision-making mandate. *See* Exhibit A, TRLA Title VI Complaint.

[96] Penelope J.E. Quintana, Traffic Pollutants Measured Inside Vehicles Waiting in Line at Major US-Mexico Port of Entry, 622-623 Science of the Total Environment 236 (May 2018), https://doi.org/10.1016/j.jenvp.2022.101775.

[97] Vanessa Eileen Galaviz et al., Urinary Metabolites of 1-Nitropyrene in US-Mexico Border Residents who Frequently Cross the San Ysidro Port of Entry, 27 Journal of Exposure Science & Environmental Epidemiology 84 (December 16, 2015) https://doi.org/10.1038/jes.2015.78; Vanessa Eileen Galaviz et al., Traffic Pollutant Exposures Experienced by Pedestrians Waiting to Enter the U.S. at a Major U.S.-Mexico Border Crossing 88 Atmospheric Environment 362 (May 2014), https://doi.org/10.1016/j.atmosenv.2013.12.042;

[98] Air monitoring data for PurpleAir sensors is available at https://map.purpleair.com/1/mAQI/a10/p604800/cC0#11/31.7775/-106.4903. As noted by a 2022 air quality study in El Paso conducted by several prominent air quality researchers: "Highways and roadways, such as I-10 and US-54, are major sources of vehicular traffic air emissions in El Paso resulting in substantial variations in neighborhood air pollutant concentrations, which cannot be captured by [central ambient monitoring] sites." Adan Rangel et al., Assessment of Traffic-Related Air Pollution (TRAP) at Two Near-Road Schools and Residence in El Paso, Texas, USA, 13(2) Atmospheric Pollution Research (February 2022), https://www.sciencedirect.com/science/article/abs/pii/S1309104221003664.

congestion of semis resulting from TXDOT's Project may not reflect the most extreme conditions many residents near the BOTA are currently exposed to.

The current air quality monitoring data is alarming and demands further studies to determine precise impacts. Currently, the closest air monitory to the BOTA is the El Paso Chamizal (481410044) air monitor, located within the Chamizal National Memorial. Although the Chamizal Monitor records 24-day average measurements of PM 2.5 only intermittently, between January 2023 and September 2023, it frequently recorded PM 2.5 concentrations well above EPA's NAAQS standard, often reaching levels more than twice the standard.[99] Yet this data only captures a glimpse of the full extent of the dangerous contamination in the Chamizal neighborhood and surround communities. GSA has the ability to fill in these gaps, and it must work closely with community groups to perform local air monitoring and conduct on-site measurements of air quality to ensure that GSA makes an informed decision.[100]

2. GSA Must Conduct a Health Risk Assessment.

One of NEPA's key goals is to "stimulate the health and welfare of man."[101] Under NEPA, an EIS must "disclose the significant health, socioeconomic and cumulative consequences of the environmental impact of a proposed action."[102] If the major federal action bears a "reasonably close causal relationship" to a change in the physical environment, such as deteriorated human health, then it must be fully analyzed in the EIS.[103] Where an agency action can be reasonably anticipated to increase air pollution and impact the health of individuals in surrounding communities, a health risk assessment must be undertaken.[104]

Should GSA choose an alternative that allows for a continuation of heavy-duty commercial traffic, it must conduct a health risk assessment. This assessment would also aid in informing GSA of the environmental justice implications of its project and contribute towards an analysis of the costs of allowing heavy-duty commercial traffic to continue. But should GSA remove heavy-duty trucks through Alternative 4, the threat of increased contamination and dangerous air pollution might be avoided, and the necessity of a health risk assessment may no longer be present.

While we support the selection of Alternative 4 as the only viable alternative that accomplishes GSA's mandates under federal law, we urge GSA to ensure that any conclusion of air quality and public health benefits is supported by adequate studies. As of now, Alternative 4 is missing critical details, and GSA must ensure that it accomplishes the goals of operational efficiency at the BOTA so that toxic emissions from passenger vehicles. Increased development

---

[99] TCEQ, Clean Air Monitor: El Paso Chamizal, available at https://www17.tceq.texas.gov/tamis/index.cfm?fuseaction=report.view_site&siteAQS=481410044.

[100] A 2022 air quality study assessing vehicular air pollution near two schools in El Paso found recommended that air quality studies performed in a high-altitude arid region like El Paso employ on-site measurements for increased accuracy instead of relying solely on central ambient monitoring sites. Adan Rangel et al., *Assessment of Traffic-Related Air Pollution (TRAP) at Two Near-Road Schools and Residence in El Paso, Texas, USA*, 13(2) ATMOSPHERIC POLLUTION RESEARCH (February 2022), https://www.sciencedirect.com/science/article/abs/pii/S1309104221003664

[101] 42 U.S.C.A. § 4321.

[102] 40 CFR §§ 1508.7, 1508.8.

[103] *Id*; *Metro. Edison Co. v. People Against Nuclear Energy*, 460 U.S. 766, 771-72, 103 S.Ct. 1556, 75 L.Ed.2d 534 (1983).

[104] See Trenton Threatened Skies, Inc v. Fed. Aviation Admin., 90 F.4th 122, 140 (3d Cir. 2024).

and traffic often follow on the heels of developments such as this one, but that need not be the case. If GSA cannot reasonably establish that air pollution will be reduced through the implementation of Alternative 4 and increased operational efficiency, it must conduct a health risk assessment.

3. GHG Emissions and Climate Impacts.

"The impact of [GHG] emissions on climate change is precisely the kind of [ ] impacts analysis that NEPA requires agencies to conduct."[105] It is particularly poignant that the BOTA project is funded by the Bipartisan Infrastructure Act and Inflation Reduction Act, which are aimed at addressing the climate crisis through sustainable and environmentally responsible infrastructure funding. Even more, Executive Order 14,008, issued by President Biden in 2021, instructs agencies to address the "profound climate crisis[:]"

> We must listen to science—and act. We must strengthen our clean air and water protections… We must deliver environmental justice in communities all across America. The Federal Government must drive assessment, disclosure, and mitigation of climate pollution and climate-related risks in every sector of our economy, marshaling the creativity, courage, and capital necessary to make our Nation resilient in the face of this threat. Together, we must combat the climate crisis with bold, progressive action that combines the full capacity of the Federal Government with efforts from every corner of our Nation, every level of government, and every sector of our economy.[106]

Yet the way things work now, agency decisions on highway and related infrastructure projects occur in a vacuum. These decisions do not factor in U.S. commitments to reduce greenhouse-gas emissions 50% below 2005 levels by 2030. They do not factor in the immensity of the climate disasters that have and continue to strike communities across the country, especially historically marginalized and vulnerable communities. And most unfortunately, these decisions fail to account for their irretractable role in these impacts and harms. GSA must correct this woeful trend in its EIS for the BOTA Modernization and analyze the qualitative and quantitative impacts of the GHG emissions from its Project.

First, GSA must inform its decision by assessing the extent of climate impacts on its project and nearby communities. GSA has already recognized its responsibility to prepare for the inevitable harm climate change will unleash across its facilities and the communities it serves. GSA has also committed to heed the latest scientific documents on climate change, including the Fourth National Climate Report,[107] and we urge GSA to incorporate the latest National Climate Report[108] into its analysis of the Project's impacts on surrounding communities. We also urge GSA to collaborate with local community groups, and state and federal agencies to address potential climate adaptation strategies at the BOTA.

As a desert community with no reliable water resources, El Paso faces unique risks from climate change. Communities in El Paso are already contending with back-to-back heat

---

[105] *Ctr. for Biological Diversity v. Nat'l Highway Traffic Safety Admin.*, 538 F.3d 1172, 1217 (9th Cir. 2008).
[106] Exec. Order 14,008, 86 Fed. Reg. 7619, 7619, 7,622 (Jan. 27, 2021).
[107] GSA, Environmental Justice Implementation Progress Report: Fiscal Years 2016-2018, https://www.gsa.gov/system/files/signed4302019Environmental_Justice_Report.pdf.
[108] USGCRP, 2023, FIFTH NATIONAL CLIMATE ASSESSMENT, U.S. GLOBAL CHANGE RESEARCH PROGRAM, WASHINGTON, CD, USA (2023), available at https://nca2023.globalchange.gov/downloads/.

records.[109] The summer of 2023 was the hottest summer on record for El Paso.[110] The season saw sixty days of 100-plus temperatures, including a record-shattering 44 days in a row from mid-June through the end of July.[111] The average temperature in El Paso between June and August surpassed 88 degrees Fahrenheit for the first time in recorded history.[112] And with an already dangerous level of ozone pollution, the more frequent and severe heat waves El Paso will face pose additional unacceptable risks. Hotter temperatures increase ozone pollution, and the impacts are most acutely felt by environmental justice communities near highways. As shown by a recently created map of the heat island effect, the hottest streets in El Paso are along I-10.[113]

Second, GSA must collaborate with local governments to develop strategies to mitigate GHG emissions and adapt to climate impacts. The City of El Paso is currently drafting its Climate Action Plan, and GSA should collaborate with the City to incorporate climate solutions at the BOTA, including energy efficient infrastructure, public transportation, and incentivizing electric vehicles. Given the contribution of cross-border traffic on GHG emissions and the long-term exposure to extreme heat pedestrians, passengers and CBP officials on the BOTA face, GSA should also coordinate with the City of El Paso on climate adaptation efforts. We urge GSA to prepare a robust climate adaptation strategy to protect the thousands of people that cross the BOTA every day, as well as the CBP employees who must endure long workdays in record-breaking heat. This strategy should include robust public transportation, which can help reduce the impacts of GHG emissions from passenger vehicles and reduce the amount of time pedestrians are exposed to extreme heat, as well as green infrastructure solutions and native landscaping to reduce the carbon footprint of the project.

Third, GSA must include a qualitative and quantitative analysis of GHG emissions from the BOTA and its contribution to climate change. In addition to evaluating the impact of climate change on the project and its surrounding area, GSA has a responsibility to contextualize its project's emissions contribution towards climate change. GSA has the information readily available to calculate the approximate amount of GHG emissions generated at the BOTA—as well as its other POEs. With data on the amount of passenger and commercial vehicle crossings, measurements on wait times at its border crossings, and estimations available as to the quantity of emissions vehicles generate when stalled, GSA is reasonably able to calculate GHG emissions. The data from northbound traffic should be readily available and the data from southbound traffic should be gathered by CBP or Mexican authorities. Should GSA forecast future traffic, it must similarly estimate future GHG emissions. This is keeping in line with

---

[109] John Nielsen Gammon et al., *Assessment of Historic and Future Trends of Extreme Weather in Texas, 1900-2036*, TEXAS A&M UNIVERSITY, Office of the Texas State Climatologist (2021), https://climatexas.tamu.edu/files/ClimateReport-1900to2036-2021; Raymond Zhong and Elena Shao, *2024 Begins With More Record Heat Worldwide*, NEW YORK TIMES, February 7, 2024, https://www.nytimes.com/2024/02/07/climate/2024-hottest-january-data.html; National Weather Service, NOAA, El Paso's 100 Degrees Days FAQ, last updated 5/27/2023, available at https://www.weather.gov/epz/elpaso_100_degree_page; Robert Moore, *El Paso Continues to Shatter Heat Records*, EL PASO MATTERS, November 28, 2023, https://elpasomatters.org/2023/11/28/el-paso-weather-hottest-fall-ever-climate-change/.

[110] Robert Moore, *Why El Paso's Summer was so Damn Hot*, EL PASO MATTERS, September 1, 2023, https://elpasomatters.org/2023/09/01/el-paso-record-summer-heat/.

[111] *Id.*

[112] *Id.*

[113] University of Texas at El Paso, *Mapping Urban Heat Islands in El Paso, Texas (2020)*, available at https://www.utep.edu/liberalarts/sega/environmental-injustice-hurricane-harvey-in-greater-houston12.html.

NEPA's mandate for informed decision making and working towards the goals of the Bipartisan Infrastructure Act and IRA. There are tools available to translate the social cost of GHG emissions into monetary impacts, and GSA should consider utilizing these tools, including the Social Cost of Carbon.[114]

Fourth, GSA must evaluate the direct, indirect and cumulative impacts of GHG emissions on environmental justice communities from each of its Ports of Entry. Should GSA choose an alternative that allows for commercial truck traffic or risks increasing traffic and emissions, it must consider those emissions in evaluating the overall climate impacts of alternatives.[115] A potential risk of increased capacity—without a formidable public transportation component—is increased traffic, increased pollution, and increased demand for services. And while the GHG emissions from one POE alone may not amount to a significant contribution towards climate change, the cumulative impacts of all of GSA's POEs GHG emissions can be significant. GSA must account for these impacts, and consider the foreseeable risks of potentially increased GHG emissions.

Environmental justice communities like San Xavier and Chamizal are disproportionately burdened by environmental pollution and face cumulative air pollution burdens from climate change-driven hazards.[116] These same communities are slated to face worsened air pollution and climate risks in the coming decades.[117] GSA has a clear opportunity to address these historically discriminatory impacts by placing the communities impacted by border crossing emissions first. Should it instead perpetuate these harms, GSA must analyze the full extent of the air and climate risks that are undeniably fueled in part by the BOTA and explain why it would chose a project alternative that imposes additional burdens on surrounding communities.

G. GSA Must Consider the Cumulative Impacts of the Project.

GSA is required to analyze the cumulative impacts of the BOTA Project in connection with past governmental actions amplifying commercial traffic at the BOTA, TxDOT's past and anticipated I-10 projects, and in connection with any other actions that risk magnifying the BOTA Project's impacts. CEQ regulations define cumulative impacts as:

> [E]ffects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time.[118]

In the cumulative impacts analysis, GSA must examine the "ecological [,]... economic, [and] social" impacts of emissions from these projects, including an assessment of their "significance."[119]

---

[114] *Vecinos para el Bienestar de la Comunidad Costera v. F.E.R.C.*, 6 F.4th 1321, 1329 (D.C. Cir. 2021).
[115] *See*, *e.g.*, WildEarth Guardians v. U.S. Bureau of Land Mgmt., 870 F.3d 1222, 1234–37 (10th Cir. 2017).
[116] Fifth National Climate Report: Chapter 14, available at https://nca2023.globalchange.gov/chapter/14/.
[117] *Id.*
[118] 40 CFR § 1508.1 (effective 05/20/2022).
[119] 40 C.F.R. §§ 1508.8(b), 1502.16(a)-(b).

GSA must account for how NAFTA has rewired the flow of vehicular traffic across the border and increased cross-border air pollution. When the Bridge of the Americas was first built, GSA could not have foreseen the overwhelming air pollution that would result from unprecedented semi-truck traffic. When the Chamizal Treaty of 1963 led to toll-free crossings at the BOTA, some amount of increased traffic could be expected, but nothing beyond ordinary expectations. But the passage of NAFTA in 1994 heralded an implosion of commercial traffic heading north and south, and as a result, has inflicted one of the most dangerous health hazards on communities around the BOTA.

Now, numerous studies have been conducted as a result of the La Paz Agreement that detail the impact of traffic from highways and the ports of entry on nearby residents' respiratory and cardiovascular health.[120] GSA must not only consider the studies, but acknowledge the role the port of entry plays in allowing for a continuation of the flow of passenger and commercial traffic, and the pollution that inevitably flow from it. As part of its cumulative impacts analysis, GSA must review all information available on the potential for an increase in vehicular traffic at its POEs, and specifically the BOTA that stems from the continuation of NAFTA. Since the passage of NAFTA, commercial crossings at the border have dramatically increased,[121] implicating increased pollution.

GSA must also consider how the current trend of increased trade with Mexico risks increased cumulative impacts of diesel emissions from commercial traffic at the BOTA. Trade between the U.S. and Mexico has been on the rise both north and southbound, and in 2023, Mexico surpassed China to become the biggest exporter of goods to the United States, with continued reliance on Mexican goods anticipated in the near future.[122] GSA must do its due diligence in discussing the foreseeable increase in trade and commercial trucks. GSA should also consider reaching out to American and Mexican authorities to discuss these impacts, and evaluate strategies GSA can take to reduce the adverse impacts of increased commercial traffic.

The air pollution from vehicular crossings at the BOTA is inextricably linked with I-10 in El Paso, and GSA must consider the cumulative impacts of past, present, and future TxDOT plans to expand I-10. In determining "reasonably foreseeable actions" that must be evaluated under the cumulative impacts analysis, agencies are required to look ahead and address actions that are "contemplated" or "potential," and need not be formal NEPA proposals that may never trigger NEPA requirements.[123] Given that TxDOT has completed a Corridor Study for the entire

---

[120] The Paso del Norte air basin—which encompasses parts of Dona Ana County in New Mexico, Cd. Juarez, Chihuahua, Mexico and El Paso Texos—was detrimentally impacted by the passage of NAFTA, and the Joint Advisory Committee on Air Quality was created as a part of the La Paz Agreement. Millions of dollars continue to fund studies on air quality in the region, with a particular emphasis on vehicle emissions.

[121] Barry L. Sullivan, Dennis L. Soden, and Janet S. Conary, *Nafta Transportaiton: The Impacts of Southern Border Trucking on the Texas Highway System*, IPED TECHNICAL REPORTS (2000), https://scholarworks.utep.edu/cgi/viewcontent.cgi?article=1006&context=iped_techrep; *See generally*, Office of the United States Trade Representative, Countries & Regions: Western Hemisphere, Mexico, https://ustr.gov/countries-regions/americas/mexico#:~:text=U.S.%20goods%20imports%20from%20Mexico,up%2064%20percent%20from%202012.

[122] Maya Averbuch and Leda Alvim, *Mexico's Moment: The Biggest US Trading Partner Is No Longer China*, BLOOMBERG BUSINESS, September 11, 2023, https://www.bloomberg.com/graphics/2023-mexico-china-us-trade-opportunity/.

[123] *Fritiofson v. Alexander*, 772 F.2d 1225, 1243 (5th Cir. 1985), *abrogated by Sabine River Auth. v. U.S. Dep't of Interior*, 951 F.2d 669 (5th Cir. 1992); *accord*, *Kern v. U.S. Bureau of Land Management*, 284 F.3d 1062,

Reimagine I-10 Project and secured most of the funding for the Downtown Segment, TxDOT's Reimagine I-10 Project is reasonably foreseeable.[124] The Reimagine I-10 Project would significantly increase the capacity of I-10, risking additional traffic to and from the BOTA. Highway expansions induce widespread development with serious environmental consequences, including deterioration of air quality. By removing the trucks from the BOTA, GSA can reduce the cumulative impacts of air contamination at and around the BOTA, but it cannot evade its responsibility to account for the impacts that TxDOT's I-10 Connect and Reimagine I-10 Projects have had and will continue to have on communities surrounding the BOTA.

H. GSA Must Provide Sufficient Information throughout the Public Participation Process.

The San Xavier community has faced a history of environmental racism, including being denied the opportunity to meaningfully participate in projects that impart significant detrimental impacts on the community. Between DATEs, TxDOT held several public meetings for its I-10 Connect Project where it touted significant traffic and pollution benefits, but the reality was far from the image cast.[125] The San Xavier community and public at large were repeatedly misinformed about the full extent of the I-10 Connect Project's impacts, including construction impacts on homes, streets and drainages, increased traffic, and increased noise and air pollution. TxDOT provided the public with numerous grandiose assurances about traffic reductions and public benefits, but never provided critical traffic studies and substantive justification for its conclusions throughout the public participation process. While GSA was not the agency responsible for the I-10 Connect Project, we urge GSA to reflect on the significant departure TxDOT took from NEPA's public participation mandate and avoid inflicting the same harm on a community already burdened by environmental pollution and a lack of transparency from those who impose additional pollution burdens. We urge GSA to readily make the materials it relies upon—including any expert studies, traffic data, and air quality data—readily available to the public both in-person and online.

GSA has recognized the importance of meaningful public participation in the NEPA process, especially for environmental justice communities. On August 4, 2011, the GSA signed the Memorandum of Understanding ("MOU") on Environmental Justice and Executive Order 12898 (MOU on Environmental Justice), which affirmed the agency's commitment to pursue environmental justice as an agency objective, and identify and address disproportionately high and adverse human health or environmental effects of activities such as the one at hand on minority and low-income populations.[126] The MOU also reaffirmed GSA's responsibilities under Title VI of the Civil Rights Act of 1964. As part of the MOU, GSA committed itself to "[e]nsure

---

1077 (9th Cir. 2002) ("contemplated" actions); *Blue Mountains Biodiversity Project v. Blackwood*, 161 F.3d 1208, 1214 (9th Cir. 1988) ("potential" actions).

[124] TxDOT, Reimagine I-10: Next Steps, https://www.txdot.gov/reimaginei10/corridor-study/nextsteps.Html; TxDOT, 2024 UTP at 96, available at https://www.txdot.gov/projects/planning/utp.html.

[125] Exhibit A, TRLA, Complaint under Title VI of the Civil Rights Act of 1964 on behalf of the San Xavier Community, December 7, 2023 [hereinafter TRLA Title VI Complaint].

[126] GSA, *Memorandum of Understanding (MOU) on Environmental Justice* and *Executive Order 12898 (MOU on Environmental Justice*, August 4, 2011 (emphasis added), available at https://www.gsa.gov/system/files/MOU_Environmental_Justice.pdf.

meaningful opportunities exist for the public to submit comments and recommendations relating to the strategy, implementation, and ongoing efforts associated with environmental justice."[127]

TRLA and its clients appreciate GSA's efforts thus far to ensure public participation opportunities, including the extension of the time granted to submit these commits. We urge GSA to continue to provide periodic opportunities throughout the development of the EIS to ensure that the numerous concerns of the public are addressed throughout the process.

We also urge GSA to take a step further in ensuring that environmental justice communities are provided with the adequate means to access information beyond public meetings. At public meetings, the information provided to the public is often limited, and significant studies, data, expert reports, and draft NEPA documents like the draft EIS are often not provided at public meetings. Often, the draft EIS and other critical information is only available for review at agency offices, which are hard to reach for those communities with limited funds and resources. We respectfully request that GSA take steps to make critical information, including the draft EIS, available at public meetings and online. It should not be left for the public to obtain missing information through an informal request to GSA, or through the formal FOIA process, which can be lengthy and impede the public's ability to meaningfully review the materials the agency relies on in its decisionmaking process.

Finally, we request that GSA clarify the proposed project timeline and funding details. In its December 13, 2023 meeting, GSA noted that it would put forth the final IS in September 2024, and issue "Completion of EIS" in late 2024. These statements leave confusion for the estimated date of the final EIS. We ask that GSA clarify the estimated timeframe for the final EIS, preferably within a month range. Further, while GSA indicated that it received funding from the IRA and plans to utilize low-carbon materials as a result of those funds, it remains unclear how much funding from the IRA will be used at the BOTA.

I. GSA Must Include Adequate Mitigation.

GSA must consider possible strategies to mitigate the impact of vehicle emissions on pedestrians at the BOTA. A YEAR study examined the serious environmental justice impacts of cross-border air pollution and noted potential mitigation strategies:

> [I]ncreased staffing, improved technology, increased capacity, reductions in emissions per vehicle, anti-idling measures, reductions in personal exposures through such measures as separation of pedestrians from traffic, the sue of vegetation barriers, rerouting traffic away from schools and planning and design to reduce exposure.[128]

We urge GSA to evaluate this and other studies examining air pollution mitigation and exposure mitigation at POEs.

1. GSA Must Include Sustainability Measures.

[127] GSA, Environmental Justic Strategy: Fiscal Years 2016-18 (May 2016), https://www.gsa.gov/system/files/Final_Approved_EJ_Strategy_FY16_-_FY18%28Final%29.pdf.
[128] Penelope J.E. Quintana et al., *Risky Borders: Traffic Pollution and Health Effects at US–Mexican Ports of Entry*, JOURNAL OF BORDERLANDS STUDIES (2015), available at https://www.researchgate.net/publication/324719712_Risky_Borders_Traffic_Pollution_and_Health_Effects_at_US-Mexican_Ports_of_Entry.

We are pleased to see that GSA plans to utilize low-carbon infrastructure materials, notably LEC materials, to reduce the carbon footprint of the project. GSA should not stop at building materials, and should seriously consider incorporating landscape architecture into the design of the BOTA. Landscape architecture has already been demonstrated to reduce the carbon footprint of government infrastructure, boost the preservation of the surrounding environment, and help alleviate past harms of systemic environmental discrimination.[129]

GSA can also expand on the benefits of landscape architecture through the creation of green spaces for people using the POE and CBP employees. This is not new to GSA, and the agency has already incorporated landscaping at POEs to provide shade and nature for employees in the middle of the desert.[130] Research shows that exposure to green natural environments produces physical and mental health benefits.[131] In a 2022 study, researchers found that green and desert environment simulations promote the stress recovery of cortisol.[132] Even more, native landscaping can be utilized to create barriers between vehicle and passenger traffic, minimizing exposure to the emissions of idling vehicles.

2. GSA Must Incentivize Electric Vehicles.

The Bipartisan Infrastructure Act created the Electric Vehicle Working Group, which includes GSA among its members.[133] The Bipartisan Infrastructure Act states that "[n]ot later than 1 year after the date of enactment of this Act, the Secretaries shall jointly establish an electric vehicle working group to make recommendations regarding the development, adoption, and integration of light-, medium-, and heavy-duty electric vehicles into the transportation and energy systems of the United States."[134]

As part of the NEPA process, agencies are required to gain input from stakeholders and the public, and to engage other potentially interested agencies. We encourage GSA to consult with the Electric Vehicle Working Group to discuss strategies that can be undertaken at the BOTA and through other anticipated and planned POE modernization projects to incentivize electric vehicles.

3. GSA Must Include Mandatory Measures to Ensure Best Practices and Minimal Disruption during Construction.

San Xavier residents are still dealing with the damage caused by TXDOT's construction of I-10 Connect, and GSA must ensure that BOTA does not follow the same route of preventable

---

[129] *See* Richard Schiffman, Ecosystems as Infrastructure: A New Way of Looking at Climate Resilience, Yale Environment 360 (November 7, 2023), https://e360.yale.edu/features/kate-orff-interview.
[130] Reed Karaim, Mariposa Land Port of Entry, Designed by Jones Studio, Architect (October 27, 2014), https://www.architectmagazine.com/design/buildings/mariposa-land-port-of-entry-designed-by-jones-studio_o.
[131] Gregory N. Bratman, Nature and Mental Health: An Ecosystem Service Perspective, 5(7) Science Advances 118,413 (July 24, 2019); Mathew P. White et al., Associations Between Green/Blue Spaces and Mental Health Across 18 Countries, 11 (8903) Scientific Reports (April 26, 2021).
[132] Jie Yin et al., Stress Recovery from Virtual Exposure to a Brown (Desert) Environment Versus a Green Environment, 81 Journal of Environmental Psychology 101775 (February 22, 2022), https://doi.org/10.1016/j.jenvp.2022.101775.
[133] 23 USCA § 151, SEC. 25006. ELECTRIC VEHICLE WORKING GROUP. The federal stakeholders of the group are the Department of Energy, the EPA, CEQ, and GSA, and membership may be extended to a representative of any other Federal agency that the Secretaries of the membership agencies consider appropriate.
[134] *Id.*

construction damage. GSA must ensure that none of its construction negatively impacts the surrounding homes, buildings, and infrastructure; GSA must conduct proper soil tests and take photographs of surrounding homes and buildings and infrastructure prior to construction. GSA must also have clear direction and supervision of the contractors that prohibits the use of heavy machinery that is known in the industry to harm homes and buildings, particularly those homes and buildings in older neighborhoods. GSA must also ensure that construction is only done during limited—and reasonable—hours of the day so that the adverse effects of noise and additional air pollution are minimized. Residents should not bear the burden of construction activities 24 hours a day, 7 days a week as they did with the I-10 Connect Project. We further urge GSA to take all available measure to prevent damage to nearby infrastructure, drainage, and wildlife at the Chamizal, and to avoid creating traffic hazards (e.g. removing lighting).

V. Conclusion

GSA's BOTA Modernization Project risks imposing significant environmental and economic harm, which must be disclosed as part of its EIS. Moving forward, GSA should select Alternative 4 and remove north- and southbound heavy-duty commercial traffic from the BOTA, improve public transportation, adequately analyze environmental justice impacts, conduct local air quality monitoring and a health assessment, reduce its contribution towards climate change, and take all practicable measures to mitigate the impacts of the BOTA.

Sincerely,

/s/ Paola Camacho
Paola Camacho
Attorney at Law
Texas RioGrande Legal Aid
State Bar No. SC105267
Tel: (915) 585-5118
Fax: (915) 544-3789
E-mail: pcamacho@trla.org

/s/ Veronica Carbajal
Veronica Carbajal
Attorney at Law
Texas RioGrande Legal Aid
TX State Bar No. 24045617
Tel: (915) 585-5107
Fax: (915) 544-3789
E-mail: vcarbajal@trla.org

EXHIBIT A

1331 Texas Ave.
El Paso, TX 79901
Phone: 915-585-5100
Toll Free: 888-988-9996
Fax: 915-544-3789
www.trla.org

December 7, 2023

Federal Highway Administration
Office of Civil Rights
Attention: Title VI Program Coordinator
1200 New Jersey Avenue, SE
8th Floor E81-314
Washington, DC 20590
CivilRights.FHWA@dot.gov

Re: Complaint under Title VI of the Civil Rights Act of 1964

To the FHWA Title VI Program Coordinator:

On behalf of residents of the San Xavier neighborhood, in El Paso, Texas, we file this complaint under Title VI of the Civil Rights Act of 1964, 49 C.F.R. § 21.5, and the United States Department of Transportation ("USDOT") and Federal Highway Administration ("FHWA") Title VI Handbook (collectively "Title VI").

For the reasons stated below, we request that FHWA undertake a Title VI compliance investigation into the Texas Department of Transportation's ("TxDOT") compliance with its obligations pursuant to Title VI of the Civil Rights Act in regard to its I-10 Connect Project[1] ("I-10 Connect" or "the Project")[2] and its impact on the surrounding residential neighborhoods.

TxDOT falsely claimed its $156-million I-10 Connect Project would alleviate traffic heading into the Bridge of the Americas Port of Entry ("BOTA" or "POE"). As every El Pasoan now knows, TxDOT failed to deliver on its promise. Instead, TxDOT has perpetuated the discriminatory policies that have impacted Mexican-American communities since the days of Jim Crow America, under which white supremacist ideology was applied to decide which communities to invest in and which communities would bear the burden of transportation projects. The San Xavier neighborhood continues to suffer from this racist legacy and its most recent continuance through the failed I-10

[1] For a general description of the project and information about the environmental review process, see TxDOT's I-10 Connect Project website, https://www.txdot.gov/projects/projects-studies/el-paso/i10-connect.html.
[2] I-10 Connect is also referred to as I-110.

Connect Project, with air pollution, traffic, health impacts, the heat island effect, noise pollution and damage from the construction of the project itself.

TxDOT violated Title VI's prohibition on discrimination due to its repeated failures under NEPA to fully inform the community and evaluate all impacts from the project, its failure to anticipate that the Project could not alleviate traffic heading south, and its failure to make any effort to mitigate the harm inflicted on homes and the San Xavier neighborhood by the construction of the Project itself. Specifically, we ask that you review TxDOT's:

1. Failure to fully consider the environmental justice impacts of the Project in the context of historical environmental discrimination of Southside communities in El Paso;
2. Failure to analyze its inability to control or predict the impact of U.S. and Mexican Customs on traffic, indicating that TxDOT knew the Project would aggravate traffic by relocating semi-trucks from Paisano Drive to I-10 Connect;
3. Failure to provide the Complainants and the public with any expert reports, traffic studies, or underlying data supporting its conclusions that the Project would reduce traffic and congestion;
4. Failure to inform the Complainants of construction impacts, including damage to homes and the 24/7 nature of construction activities that went on for weeks, and traffic impacts, including the potential for increased pollution and noise from increased traffic, particularly from 18-wheelers (referred to here as "heavy-duty traffic" or "semi-trucks") that were being relocated from Paisano Drive to Complainants' neighborhood;
5. Failure to prevent and respond to dangerous and harmful conditions posed by negligent construction practices used for I-10 Connect, which led to the damage of homes and neighborhood infrastructure, including drainage issues, traffic hazards, and lack of proper lighting; and
6. Failure to consider and analyze how to reduce the volume of traffic on the BOTA and I-10 Connect, namely, by implementing public transportation programs and prohibiting 18-wheelers from using I-10 Connect.

TxDOT's decisions and procedures violate its duty to administer all programs and activities in a nondiscriminatory manner. These violations include both actions that have caused and will cause significant adverse and disparate impact on the basis of race, color, and ethnicity, as well as acts that constitute intentional discrimination based on these protected characteristics and are prohibited by Title VI.

We respectfully request that USDOT take all appropriate actions to ensure TxDOT's compliance with Title VI, including full and fair compensation to the Complainants for the damage to their homes; repairing the neighborhood's infrastructure (flooding, car accident hot spots, debris, noise); prohibiting semi-trucks from using I-10 Connect; adopting and enforcing requirements to ensure responsible construction practices, including pre-assessment of homes and soil composition, and the prohibition of

certain construction equipment; adopting and enforcing requirements to ensure the full dissemination of information to communities during and after the public participation process, and a comprehensive health study and monitoring of impacted residents. We also request that USDOT support the Complainant's requests as part of the GSA's upcoming BOTA Modernization[3] ("BOTA Modernization") Project's NEPA process, namely, to remove 18-wheelers from BOTA heading both north and south, and to incorporate robust public transportation as part of the BOTA Modernization and nearby areas.

This complaint is vitally important because of the Project's ongoing impact on the Complainants and because the upcoming $700 Million BOTA Modernization provides an opportunity to remedy some of TxDOT's failures. The General Services Administration ("GSA") will hold the first public scoping meeting for its Bridge of the Americas Modernization Project on December 13, 2023.[4]

I. Complainants.

The area impacted by I-10 Connect is north of Paisano Dr., east of N. Copia St., south of I-10, west of Texas 375 Loop and US 54, and the residential streets surrounding Zavala Elementary, including those on N. Copia St., Rivera Ave., and N. Hammett St., and south of Alameda Ave.[5] Complainants have taken on the name of the San Xavier neighborhood after the St. Francis Xavier Catholic Church and Parish located at 519 S. Latta St. A pattern of governmental decisions has placed Southside communities like San Xavier at the forefront of environmental contamination. In recognition of this, the Chamizal community—west of San Xavier—has advocated for clean air since the passage of the North American Free Trade Agreement ("NAFTA") in 1994. The Chamizal community has voiced concerns to TxDOT and local government authorities to take meaningful action to ameliorate air pollution, including by advocating for the removal of semi-trucks from Paisano Drive and the BOTA. In furtherance of this goal, residents of the Chamizal and San Xavier neighborhoods engaged in public participation throughout the I-10 Connect Project.

II. Jurisdiction.

Title VI's prohibition on discrimination applies to all recipients of federal funds. "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." 42 U.S.C. § 2000d. Accepting federal funds from USDOT creates an obligation for the

[3] U.S. General Services Administration, Region 7: Greater Southwest, *Bridge of the Americas Land Port of Entry*, https://www.gsa.gov/about-us/gsa-regions/region-7-greater-southwest/buildings-and-facilities/texas/bridge-of-the-americas-land-port-of-entry.
[4] *Id.*
[5] TxDOT, Final Environmental Assessment, I-10 Connect From Yandell Drive to Loop 375 (Cesar Chavez Border Highway) El Paso County, Texas (August 2018), available at https://www.txdot.gov/projects/projects-studies/el-paso/i10-connect.html (hereinafter TxDOT EA).

recipient to comply with Title VI and USDOT's implementing regulations.[6] As explained below, TXDOT is a "program" receiving federal financial assistance and is therefore subject to Title VI and USDOT's implementing regulations. This Complaint satisfies all jurisdictional and prudential considerations established by Title VI, USDOT's implementing regulations, and other agency guidance.

A. TxDOT is a "Program" as Defined by Title VI.

Title VI defines a program or activity as "all of the operations of . . . a department, agency . . . or other instrumentality of a State or of a local government . . . any part of which is extended Federal financial assistance." 42 U.S.C. § 2000d-4a. Accordingly, if any part of a state agency receives federal funds, the entire agency is covered by Title VI. *See Ass'n of Mexican-Am. Educators v. California*, 195 F.3d 465, 474–75 (9th Cir. 1999), *rev'd in part on other grounds*, 231 F.3d 572 (9th Cir. 2000) (en banc); *see also* U.S. Dep't of Justice, *Title VI Legal Manual* § V(C) (Sep. 27, 2016), https://www.justice.gov/crt/fcs/T6manual ("DOJ Title VI Manual").

TxDOT is a "program or activity" that is subject to the requirements of Title VI. *See* 42 U.S.C. § 2000d-4a(1)(A)-(B); 49 C.F.R. § 21.23(e)(1). As the agency responsible for transportation solutions within the state, TxDOT plays a direct role in highway planning and construction.

B. TxDOT Receives Federal Financial Assistance.

TxDOT is a past and current recipient of federal funding, including grants coming directly from the U.S. Department of Transportation's Federal Highway Administration and Federal Transit Administration ("FTA"). TxDOT is a primary recipient of federal funds. *See* 49 C.F.R. § 21.23(d), (f); 28 C.F.R. § 42.102(f)-(g). TxDOT's I-10 Connect Project, a metro and urban area corridor, was funded by both the federal and state government.[7]

As a recipient of federal funding, TxDOT is required to provide assurances that it is in compliance with Title VI on each of its applications for federal funding. 49 C.F.R. § 21.7. TxDOT is further required to ensure that the City of El Paso's transportation planning process complies with Title VI. 23 C.F.R. § 450.218; 23 C.F.R. § 450.334. Conversely, TxDOT is also required to abide by the requirements of the City of El Paso's Metropolitan Transportation Planning Organization ("MPO") Plan, which reiterates the responsibilities of government actors under Title VI.[8] TxDOT claims that the I-10 Connect Project complies with the City's MPO Plan.[9]

---

[6] USDOT regulations require applicants for agency funds to give "assurance" that they will comply with the agency's Title VI implementing regulations. 49 C.F.R. § 21.7a(1).

[7] *See* TxDOT EA at 4 ("The proposed project would be funded with state and federal funds for a total projected cost of $108,263,792.).

[8] City of El Paso Metropolitan Transportation Organization, Horizon 2040: Metropolitan Transportation Plan at 17 (hereinafter El Paso MPO Plan).

[9] TxDOT EA at 4.

Accordingly, TxDOT's environmental assessment analysis, siting decision, public participation process, and mitigation for the I-10 Connect Project are all subject to the requirements of Title VI.

C. Timeliness.

This complaint alleges that TxDOT is in continuing violation of Title VI. At present, and as more fully discussed below, TxDOT discriminates against Mexican and Mexican-American persons in the San Xavier neighborhood by continuing to ignore the ongoing harms stemming from its I-10 Connect Project. In addition, TxDOT repeatedly violated Title VI throughout the NEPA process, as it failed to provide crucial traffic studies and other supporting evidence to the public, failed to fully consider the environmental justice impacts of increased traffic, noise and air pollution from the project, failed to inform the public of potential construction impacts, and failed to implement any mitigation measures for those impacts.

The Office of Civil Rights ("OCR") has ongoing authority to periodically review recipients' programs and activities to ensure Title VI compliance. 40 C.F.R. § 7.115. This complaint is timely because TxDOT continues to ignore the ongoing harms faced by San Xavier residents from I-10 Connect, and thus, its discriminatory acts remain ongoing. Should any of TxDOT's individual actions throughout the proposal and implementation of I-10 Connect no longer fall within the 180 calendar days of an alleged discriminatory act, we request that OCR waive these time limits in the interest of justice. 40 C.F.R. § 7.120(b)(2).

III. TxDOT Violated Title VI of the Civil Rights Act of 1964.

Title VI and USDOT's implementing regulations prohibit recipients of federal funding from excluding persons from participation in programs or denying persons the benefit of programs on the basis of race. *See* 42 U.S.C. § 2000d; 49 C.F.R. § 21.5(a); 28 C.F.R. § 42.104(a). Recipients of federal transportation funding are prohibited from making project site selections that discriminate on the basis of race, 49 C.F.R. § 21.5(b)(3).

Complainants can establish a Title VI violation in two ways: by establishing that the government has intentionally discriminated against a protected class, or by showing that the challenged decision has disparately impacted a protected class.[10] As explained in detail below, TxDOT has violated Title VI on both grounds.

A. San Xavier is an Environmental Justice Community.

[10] *Alexander v. Choate*, 469 U.S. 287, 293 (1985) (discussing *Guardians Ass'n v. Civil Serv. Comm'n of N.Y. City*, 463 U.S. 582 (1983)).

I-10 Connect is located in south-central El Paso and leads to the international border with Mexico. TxDOT described San Xavier and surrounding neighborhoods as:

> [U]rban and includes residential, commercial, light industrial, and recreational properties. Lincoln Park, Chamizal National Memorial Park, Concordia Cemetery, Temple Mt. Sinai Cemetery, B'nai Zion Cemetery, Evergreen Cemetery, St. Francis Xavier Church, Zavala Elementary, the El Paso Zoo, and the Bridge of the Americas Port of Entry are located within or near the project area.[11]

TxDOT identified the POE as "a major defining feature of the area."[12] In fact, I-10 Connect is connected to the POE.

Table 1. Demographics of Census Tracts Immediately Adjacent to I-10 Connect.[13]

Location	% People of Color	% Low-Income	Per Capita Income	% LEP	% Less than High School Education	% People with Disabilities
Tract 48141002900 (San Xavier)	97	76	$13,126	44	47	22
Tract 4814100280 (West of San Xavier)	99	89	$10,164	51	57	18
Tract 4814100300 (East of San Xavier)	98	75	$8,533	44	49	28

The widening of the highway as part of I-10 Connect brought the highway even closer to Zavala Elementary, which was built in 1925.[14] For the 2021-2022 school year, Zavala had a student population of 306 students. Of these, 94.4% were Hispanic and 1% were Native American. 78.1 % of students were English Language Learners, compared to El Paso ISD at 40.8%; and Texas at 21.9%. 13.4% of the students were enrolled in Special Education, compared to 11.3% at EPISD, and 11.6% statewide. Even more, 92.2% of the students were "at risk"[15] at Zavala, compared to 63.8% at EPISD, and

[11] TxDOT EA at 9-10.
[12] TxDOT EA at 86.
[13] Data generated by EPA, EJScreen Tool. Available at https://ejscreen.epa.gov/mapper/.
[14] EPISD, Zavala Elementary School, https://www.episd.org/Page/2892.
[15] A student is identified as being at risk of dropping out of school based on state-defined criteria.

53.5% statewide. At Zavala, 94.8% of students were economically disadvantaged,[16] compared to 73.5% at EPISD and 60.7% statewide.[17]

B. TxDOT Intentionally Discriminated against San Xavier Residents.

Intentional discrimination "need not be proved by direct evidence." *Rogers v. Lodge*, 458 U.S. 613, 618 (1982); *see also Veasey v. Perry*, 830 F.3d 216, 235-36 (5th Cir. 2016) (officials rarely "announc[e] an intent to discriminate based upon race, whether in public speeches or in private correspondence."). Instead, courts make "a sensitive inquiry into such circumstantial and direct evidence of intent as may be available." *Vill. Of Arlington Heights v. Metro. Hous. Dev. Corp.*, 429 U.S. 252, 266 (1977). The non-exhaustive factors in this inquiry are: (1) the discriminatory effect of the official action; (2) the historical background of the decision; (3) the specific sequence of events leading up to the decision; (4) departures from the normal procedural sequence; (5) departures from the normal substantive factors, and; (6) the legislative or administrative history of the decision. *See Arlington Heights*, 429 U.S. at 266–68; *Veasey*, 830 F.3d at 231.

Moreover, where prior discriminatory practice or usage has tended to subject individuals to discrimination under any program or activity to which Title VI applies, the applicant or recipient "must take affirmative action to remove or overcome the effects of the prior discriminatory practice or usage." 49 C.F.R. § 21.5(b)(7). Thus, because of the legacy of discriminatory practices impacting San Xavier residents, TxDOT has an affirmative responsibility to not only avoid discriminating against its residents today, but also to overcome the legacy of its past discrimination.

An investigation into TxDOT's actions in furtherance of the I-10 Connect project will demonstrate that TxDOT intentionally discriminated against the San Xavier residents and completely disregarded any measures to "remove or overcome the effects of the prior discriminatory practice or usage," for several reasons.

C. The I-10 Connect Project has Disproportionately Impacted the San Xavier Community, Feeding into an Invidious History of Racial Discrimination.

The inquiry into whether an agency decision was fueled by racial animus starts with examining whether there has been a disproportionate impact on a protected class. The Supreme Court has recognized that disproportionate impact, on its own, "can satisfy the intent requirement where it tends to show that some invidious or discriminatory purpose underlies the policy."[18] If the challenged decision "manifest[s] a consistent

[16] A student is defined as "economically disadvantaged" if he or she is eligible for free or reduced-price lunch or other public assistance.
[17] Texas Tribune, Public Schools Explorer, Zavala Elementary School, https://schools.texastribune.org/districts/el-paso-isd/zavala-elementary-school/
[18] *Arlington Heights*, 429 U.S. at 264-66; *Hazelwood Sch. Dist. v. United States*, 433 U.S. 299, 307-08 (1977).

pattern of actions" that disparately impacts a protected class, then the disparate impact is probative of discriminatory intent.[19]

Additionally, TxDOT's mandate to take "affirmative action to remove or overcome the effects of the prior discriminatory practice or usage"[20] dovetails with the second factor to consider in the intentional discrimination inquiry: the historical background of the decision.[21] As described below, the San Xavier residents and other Southside communities have borne the brunt of environmental impacts for the past few decades through a history of discrimination that TxDOT has both ignored[22] and exacerbated with its failed I-10 Connect Project.

When agencies seek to enlarge or extend highways, they must grapple with the context: infrastructure is where it is often for discriminatory reasons; expanding these systems may disparately burden the same communities, who continue to live along the same thoroughfares. While El Paso is a majority-minority city, communities like the San Xavier neighborhood—which are nearly 100% People of Color and have higher concentrations of foreign-born residents—are disproportionately burdened by air pollution stemming from the discriminatory siting of railroads, highways, industries, international ports of entry, and cross-border air pollution centuries in the making.[23] The San Xavier neighborhood—one of several environmental justice neighborhoods in southside El Paso—bears the legacy of hundreds of years of racism, including zoning that allowed homes, residents, schools and public spaces to co-exist immediately next to commercial and light industrial facilities, such as sewage treatment plants and warehouses, large transportation projects, the railroad, and international ports of entry.

El Paso – despite being a majority-minority community – was not exempt from Jim Crowe discrimination. Here as across the country, highways were constructed around and through Black and Hispanic communities to cement segregation. The discriminatory practices of redlining laid the groundwork for future highway sitings. Before I-10 was built, the railroad segregated low-income communities of color, primarily Mexican-American and Black, from their whiter counterparts north of the railroad.[24] The map attached as **Exhibit A** demonstrates that the San Xavier and Chamizal neighborhoods—found within the sections labeled as C and D—were described as being occupied by "Mexicans", "negroes", "foreigners," and "laborers"; containing substandard housing;

[19] *Sylvia Dev. Corp. v. Calvert Cnty., Md.*, 48 F.3d 810, 819, 823 (4th Cir. 1995) (internal quotations omitted).
[20] 49 C.F.R. § 21.5(7).
[21] The Fifth Circuit has recognized that discrimination can have enduring effects, and the "contemporary" nature of the more recent highway construction projects around the San Xavier neighborhood allocates significant probative value when analyzing TxDOT's underlying intentions in the I-10 Connect project. *See Veasey*, 830 F.3d at 232, 239.
[22] *See infra* section III.E.
[23] *See* Isa Gutierrez et al., *'Like a Dumping Ground': Latina moms in Texas border city are fighting air pollution*, NBC NEWS (Feb. 22, 2022), available at https://www.nbcnews.com/news/latino/-dumping-ground-latina-moms-texas-border-city-are-fighting-air-polluti-rcna16789.
[24] Redlining maps from the mid-1930s and 40s were created by the Home Owners' Loan Corporation and its parent bureau, the Federal Home Loan Bank Board.

and as being avoided by mortgage lenders. Disinvestment in these communities further perpetuated their deterioration, and TxDOT's actions to this day have allowed this deterioration to continue.

The pattern of government-sponsored discrimination based on national origin—specifically targeting Mexican-Americans—continued as San Xavier was enveloped by new highways. In 1957, TxDOT constructed Interstate-10 (east and west), which abuts the northern portion of the San Xavier neighborhood. The construction of I-10 significantly restricted travel between the now-divided portions of the neighborhood. US-54 (north and south)—built in 1926 and modified in 1970—sets the eastern boundary of the neighborhood. In the 1960s, construction began on Texas Loop 375, and the portion known as the Cesar Chavez Border Highway was placed immediately east of the neighborhood. The construction of I-110 in 1967 further divided the neighborhood and resulted in a community surrounded by highways at every corner.[25] Today, the legacy of the discriminatory siting of these highways continues to disparately impact the health and well-being of the neighborhood. The google map attached as **Exhibit B** shows the proximity of roads to San Xavier.

These transportation projects cemented racial inequities while creating new ones by cutting off neighborhoods and concentrating traffic and the noise and air pollution it brings, along with a negative impact on property values. I-10 Connect is more of the same. Table 1 demonstrates that the populations residing in the census tracks immediately adjacent to I-10 Connect are environmental justice communities facing above average levels of poverty, limited English language proficiency, limited access to education, immigrants, and people with disabilities. Thus, TxDOT's actions have disparately impacted a protected class.

The San Xavier neighborhood is not just surrounded by local and state roads and highways, but is also directly across from one of the largest Ports of Entry in the United States, known as the Bridge of the Americas, the Cordova Bridge, and the "Free Bridge" or "Puente Libre." In 1963, the United States and Mexico entered into the Chamizal Convention ("Chamizal Treaty" or the "Treaty"), to address a long-standing boundary dispute.[26] The treaty resulted in the Rio Grande being relocated into a new channel and the United States' transfer of over 823-acres of land to Mexico, which included land referred to as the Chamizal tract and Cordova Island.[27] Families that had lived on the land transferred to Mexico were relocated, and the San Xavier neighborhood was now even closer to the BOTA.

In addition to displacement, the Chamizal Treaty also gave rise to incessant pollution from heavy truck traffic. By removing the tolls from the BOTA and moving the

[25] *See supra* n. 21.
[26] NPS, Convention Between The United States Of America And The United Mexican States For The Solution Of The Problem Of The Chamizal, August 29, 1963, available at https://www.nps.gov/cham/learn/historyculture/chamizalconvention.htm.
[27] *Id.* at Art. 1, 2. The Cordova bridges had allowed commercial vehicles previously. *Id.* at Art. 10.

BOTA closer to Paisano Drive, the Treaty inevitably attracted commercial truck traffic. Commercial trucks were allowed to use the BOTA because the Treaty states "[t]he agreements now in force which relate to the [Cordova Bridges] shall apply to the new international bridges which replace them." Complainants argue that this interpretation is no longer relevant due to the dramatic difference in the volume and characteristics of commercial traffic since the passage of the Treaty.

When the Chamizal Treaty was signed in 1963, no one anticipated the exponential growth of commercial and passenger traffic that would follow with the passage of NAFTA in 1994. Nor did anyone anticipate that most of the commercial trucks would be 18-wheelers, bringing in unprecedented deterioration of the air quality and health of communities in the Paso del Norte air basin, including the San Xavier neighborhood.

The Chamizal Treaty's interpretation allowing semi-trucks on the BOTA and NAFTA created perfect conditions for unprecedented traffic and air pollution, which TxDOT enabled through its siting of highways. Semi-trucks *heading north* idled while they waited to be inspected by U.S. Customs, and when the semis *headed south* to be inspected by both U.S. and Mexican Customs, they idled in front of Bowie High School, the Salazar public housing apartments, the Chamizal Park, and in close proximity to Douglass Elementary and residences.

When TxDOT began designing I-10 Connect, it knew semi-truck traffic was a problem that imposed environmental costs on Southside neighborhoods. TxDOT *could have* advocated for the removal of 18-wheelers from the BOTA to prevent them from idling on their way *north and south*. TXDOT *could have prohibited* 18-wheelers from using I-10 Connect, thereby impeding their entry into the BOTA heading *south*. Instead, TxDOT removed the trucks from Paisano Drive and simply redirected them to I-10 Connect and next to homes, subsidized housing, Zavala Elementary and the El Paso Zoo. This relocation of the 18-wheelers is even more problematic for two reasons: (1) 18-wheelers now merge with passenger vehicles, causing safety hazards and increased bottlenecking, and (2) U.S. and Mexican Customs do not appear to be doing anything to accelerate inspections of 18-wheelers heading south.

TxDOT paid no heed to the risk of repeating history. Instead of attempting to mitigate the air pollution in southside neighborhoods like San Xavier through equitable transportation strategies, TxDOT only exacerbated the problem by repeatedly placing—and expanding—highways in historically neglected communities, and directing semi-truck traffic close to these communities, all while knowing it lacked the ability to speed up the commercial traffic heading south.

D. TxDOT's Repeated Failures under NEPA to Provide the Community with Critical Information is Probative of Intentional Discrimination.

TxDOT repeatedly ignored NEPA's procedural requirement to meaningfully inform the public throughout its project planning process. In other words, the

"extraordinary degree of [TxDOT's] procedural irregularities" strongly indicates discriminatory intent[28] and cannot be attributed to mere negligence.

USDOT defines "discrimination" as:

> [A]ny action or inaction, whether intentional or unintentional, in any program of a recipient of Federal financial assistance that results in disparate treatment (including retaliation under 49 C.F.R. §21.11(e)), disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin (including limited English proficiency).[29]

By repeatedly failing to divulge mandatory information to a protected class—one that has been subjected to discrimination and exclusion from major governmental decisions—TxDOT has caused a disparate impact and has "perpetuat[ed] the effects of prior discrimination." Even more, TxDOT has violated Title VI requirements under the applicable El Paso MTP, which requires "full and fair participation by all potentially affected communities in the transportation decision-making process."[30]

Pursuant to NEPA, TxDOT led the environmental assessment analysis and planning process for I-10 Connect. TxDOT went through a scoping process and released a Draft Environmental Assessment ("EA") that was only accessible in-person at TxDOT's El Paso office.[31] TxDOT released its Final EA for the I-10 Connect Project in August 2018.[32] TxDOT concluded that the project **would not result in any significant adverse impacts, and thus, did not warrant an Environmental Impact Statement** ("EIS").[33] But this finding was made without the requisite community input, as it was made after keeping San Xavier residents in the dark about the full extent of the impacts to the neighborhood in three key ways.

First, TxDOT failed to inform residents of the likelihood and impacts of increased air and noise pollution from increased vehicular traffic. NEPA requires government agencies to "consider every significant aspect of the environmental impact of a proposed

---

[28] *See Veasey*, 830 F.3d at 237–38, 238-241 (finding discriminatory intent where the Texas legislature engaged in "numerous and radical procedural departures[.]").
[29] USDOT, Order 1000.12C, The U.S. Department of Transportation Title VI Program at 4 (June 11, 2021), available at https://www.transportation.gov/mission/us-department-transportation-title-vi-program.
[30] El Paso MPO Plan at 17.
[31] TxDOT, July 30, 208 Public Hearing Summary, at 10, *NOTICE: Draft Environmental Assessment Available for Public Review and Public Hearing I-10 Connect*. TxDOT's El Paso Office is located approximately 13 miles away from the I-10 Connect project area and has regular hours of 8am-5pm on Monday through Friday. The impacted communities are low-income and working class, and thus may not have viable transportation options or the flexibility to go to TxDOT's office during regular weekday hours. Historically, TxDOT has not made significant investments in public transportation projects that could help low-income communities like those around the I-10 Connect Project area access in-person resources such as TxDOT's regional offices.
[32] TxDOT EA.
[33] *Id.* at 33.

action"[34] and to "inform the public of the potential environmental impacts of proposed actions and explain how their decisions address those impacts."[35] TxDOT failed on both counts.

TxDOT repeatedly told the public that the project would alleviate traffic congestion issues and address the public's concerns with POE commercial semi-truck and passenger vehicle ("POV") traffic.[36] While TxDOT did inform the public of altered access and travel patterns for the impacted community, it did not inform the public of any potential risk for increased traffic, which would make altered access even more burdensome and increase air pollution.[37] Without any supporting evidence provided, TxDOT falsely assured the public that the project would reduce traffic and even reduce air pollution. This also indicates that TxDOT did not make an informed decision in withholding further analysis on air quality impacts. For example, TxDOT decided that no further air quality impact analysis was necessary since the project was expected to reduce emissions. [38]

TxDOT told the public:

> [I-10 Connect] expands US 54, I-10, I-110, and US 62 (Paisano), and includes eight bridge replacements, one railroad overpass, five bridge widenings, and two new direct connectors. The project widens I-110, provides separate truck lanes for Southbound traffic going to Mexico, and provides multi-modal improvements along US 62 which experiences more than 1 million pedestrian crossings per year. Once complete, the project will provide **unprecedented connection** to multiple high-volume arteries and alternate routes.[39]

Rather than provide "unprecedented connection," I-10 Connect has provided **unprecedented congestion** into Mexico through I-10 East, I-10 West and US-54. Since its completion in December 2021, I-10 Connect has resulted in increased congestion from traffic heading south into Mexico from both passenger vehicles and semi-truck traffic. Significant congestion and idling now occurs on I-10 West from the Paisano exit (Exit 22B), I-10 East from the Piedras exit, and US-54 South. The traffic idles for hours next to

---

[34] For a discussion on TxDOT's failure to consider every significant impact under NEPA, i.e. its substantive departures from normal procedures, *see infra* Section III.E.

[35] *Baltimore Gas & Elec. Co. v. Natural Resources Defense Council*, 462 U.S. 87, 97, 103 S.Ct. 2246, 76 L.Ed.2d 437 (1983).

[36] *See infra* at n. 52. This was particularly important since I-10 Connect was removing trucks from Paisano (east, heading into the POE) and redirecting them to I-10 Connect.

[37] TxDOT EA at 12, 13.

[38] *Id.* at 22 (TxDOT claimed that the "project [would] not result in changes in traffic volumes, vehicle mix, basic project location, or any other factor that would cause a meaningful increase in MSAT impacts of the project from that of the No-Build Alternative.").

[39] Antonio Santana PE *Transportation Engineering Supervisor, TXDOT - El Paso District*, https://www.texasce.org/tce-news/i-10-connect-project-texas-department-of-transportation-el-paso-district/ (emphasis added).

residential neighborhoods and immediately next to Zavala Elementary,[40] and has resulted in an increase in air pollution, noise pollution, and a decrease in quality of life. San Xavier residents report truck drivers honking into late hours and using their community to urinate. To add insult to injury, residents of San Xavier who travel to Mexico must now go around their neighborhood and join the traffic idling on the way south. The traffic has also resulted in car accidents between passenger vehicles and 18-wheelers. **Exhibit C** shows photographs of the idling traffic and a recent accident involving an 18-wheeler.

Second, TxDOT repeatedly withheld the information necessary for the public to meaningfully evaluate TxDOT's bold traffic reduction claims. To satisfy public participation requirements under NEPA, TxDOT must provide the information necessary for the public to "check" TxDOT's work and submit informed comments.[41] Specifically, TxDOT must provide the public with any "underlying environmental data" used to support expert opinions over a proposed project.[42] NEPA's regulations require both EAs and EISs to "identify any methodologies used and [] make explicit reference to the scientific and other sources" relied upon for conclusions in the assessment.[43] Otherwise, "allowing [an agency] to rely on expert opinion without hard data either vitiates a plaintiff's ability to challenge an agency action or results in the courts second guessing an agency's scientific conclusions."[44]

Throughout TxDOT's public meetings, voluminous claims were made about the Project's anticipated traffic benefits, but the studies and data to back these claims were never provided. For example, TxDOT provided the public with a summary of its Alternatives Analysis, but never provided any of the underlying studies or data. TxDOT explained that it started with evaluating 11 conceptual alternatives based on traffic mobility, engineering, and potential environmental impacts.[45] Four of these alternatives were then evaluated under an alternatives evaluation matrix that was available for public

[40] The traffic is the most severe during the morning hours and again after around 2pm through 10pm, but at times, well after midnight.
[41] *Coal. for Healthy Ports v. United States Coast Guard*, No. 13-CV-5347 (RA), 2015 WL 7460018, at *16 (S.D.N.Y. Nov. 24, 2015).
[42] *Idaho Sporting Cong. v. Thomas*, 137 F.3d 1146, 1150 (9th Cir. 1998), *as amended on denial of reh'g* (May 13, 1998), and *overruled on other grounds by The Lands Council v. McNair*, 537 F.3d 981 (9th Cir. 2008) (finding that Forest Service violated NEPA where it provided public with an expert report, but not the underlying data behind that report); *Klamath–Siskiyou Wildlands v. BLM*, 387 F.3d 989, 996 (9th Cir.2004) ("NEPA documents are inadequate if they contain only narratives of expert opinions."); *Jones v. Nat'l Marine Fisheries Serv.*, 741 F.3d 989, 997 (9th Cir. 2013) (Corps did not violate NEPA's duty to inform the public where it cited the underlying environmental data in its EA and made the data available to the public); *Wildlaw v. U.S. Forest Serv.*, 471 F. Supp. 2d 1221, 1257 (M.D. Ala. 2007) (finding Forest Service did not violate NEPA where the underlying data used to determine the impacts of each individual project was provided to the public); *Coal. for Healthy Ports*, No. 13-CV-5347 at *16 (finding that Coast Guard satisfied NEPA's requirement to fully inform the public and support its conclusions by providing the induced growth analysis it relied on for its predictions of anticipated growth and additional truck trips per day at Port terminals).
[43] 40 C.F.R. § 1501.5 (referencing 40 C.F.R. § 1502.23).
[44] *Klamath-Siskiyou Wildlands Ctr.*, 387 F.3d at 996 (9th Cir. 2004) (quoting *Idaho Sporting Cong.*, 137 F.3d at 1150).
[45] TxDOT EA at 6.

review at the January 21, 2016 and July 7, 2017 public meetings.[46] The matrix ranked the alternatives by their effect on traffic and mobility through four criteria: access to major roadways, avoidance of queuing on I-10 DCs,[47] improvement of queuing at the Bridge of the Americas Port of Entry, and reduction of overall congestion.[48] Yet TxDOT never explained how it made the determinations for each criterion.

At every public meeting,[49] TxDOT repeatedly claimed that traffic would be reduced, all without providing any underlying studies or data, effectively denying the public the right to "check [its] work."[50] For example, at each public meeting, TxDOT presented video simulations: one that demonstrated existing traffic conditions and projected future traffic conditions under a No-Build Alternative (January 2016 meeting), another projected reduced traffic under the preferred alternative (July 2016 and January 2017 meetings).[51] However, no information was provided on the data used behind the simulations. TxDOT also made numerous claims about how the project was intended to—and would in fact—result in a reduction of traffic and congestion, notably the queuing of commercial trucks.[52] But at every juncture, the public was kept in the dark about the underlying information used to support these claims.

When commentors raised concerns about increased traffic and pollution in the neighborhoods, TxDOT provided blanket assurances that traffic would be reduced in each instance, without an accompanying explanation, let alone any traffic studies. For example, at the initial January 21, 2016 public meeting, one commentor flagged "the extreme amount of pollution that already exists in the Chamizal neighborhoods" and suggested moving the trucks to the Zaragoza Port of Entry in order to "keep trucks out of heavily populated neighborhoods, such as Chamizal[.]"[53] Other commentors raised the issue of the noise made "till late hours" by the trucks"[54] and TxDOT's "glaring omission of air quality studies[.]"[55] Guillermo Glenn, a long-time advocate for Southside

[46] *Id.* at 30.
[47] TxDOT does not provide an explanation for what "DCs" is an abbreviation for.
[48] TxDOT EA at Appendix C: Alternatives Evaluation Matrix.
[49] TxDOT held public meetings on January 21, 2016, July 7, 2016, and January 31, 2017.
[50] *Coal. for Healthy Ports*, No. 13-CV-5347 at *16.
[51] TxDOT, January 21, 2016 Public Meeting Presentation at 10-12; TxDOT, July 7, 2016 Public Meeting Summary at Attachment E, Video - Alternative 9 VISSIM Traffic.
[52] TxDOT January 21, 2016 Public Meeting Summary at 1; *id.* at 5 (responding to comment); *id.* at 7 (responding to comment); *id.* at 14 (responding to comment); *id.* at 16 (responding to comment); TxDOT Public Notice for January 21, 2016 Public Meeting ("The improvements are needed to improve mobility and address congestion on the existing roadway network."); TxDOT, July 7, 2016 Meeting Summary at Attachment A: Comment Response Matrix, at 8 (responding to comments); *id.* at 9 (responding to comments); *id.* at Attachment E: Figures, Port of Entry Queuing Projections (projecting reduced traffic in 2025 under preferred alternative); January 31, 2017 Meeting Summary at Attachment A: Comment Response Matrix, at 3 (responding to comment); *id.* at Attachment E: Figures, 01_Preferred_Alternative_Traffic_Simulation_Year2040 (video simulation of reduced flow of traffic for year 2040).
[53] January 21, 2016 Meeting Comment by Clavo Martinez, from TxDOT Summary of January 21, 2016 Public Meeting, Appendix E: January 21, 2016 Comment by Guillermo D. Glenn.
[54] January 21, 2016 Meeting Comment by Mando Espinoza.
[55] January 21, 2016 Meeting Comment by Alejandra Ponce.

neighborhoods commented that "there should be a solution to the maquila trucks entering the free bridge from Paisano. There should be other alternatives that do not take all the traffic through the Mexican American Barrios."[56]

At the July 7, 2016 public meeting, one commentor asked how TxDOT expected to reduce traffic by simply diverting traffic to the same amount of lanes.[57] Another commentor expressed similar concerns, noting that the pollution from the trucks "[is] still going to hit us" and noting several medical surveys about the impacts of emissions from 18-wheelers on children.[58] And at the January 31, 2017 public meeting, one commentor questioned the effectiveness of simply diverting traffic from Paisano to I-10/I-110 and noted that "you are still going to see heavy congestion in the area[.]"[59]

In response to these concerns, TxDOT repeated its token claim—the same justification it would use to avoid further analysis of potential impacts and consideration of additional mitigation measures—that the project was "intended to improve mobility and reduce congestion," which in turn would reduce air pollution.[60] TxDOT even assured the public that it evaluated ways to reduce the impacts of trucks to and from the Port of Entry,[61] and that its strategy to re-rout[e] all traffic" would "provide[] for efficient operations at the Port of Entry."[62] Aside from succinct and lofty claims, TxDOT provided no supporting evidence or thorough analysis to the public.[63]

By the July 20, 2018 public hearing—the last opportunity for the public to convene and comment on the project—the public was under the belief that the only adverse risk of the project had been addressed. Many of the commentors even responded favorably to the project under the assumption that it would reduce traffic.[64] Had the public received complete information from the beginning, they would have had the opportunity to meaningfully comment on the project—and not simply trust in TxDOT's word—as NEPA requires.[65] However, TxDOT neglected its duty to provide information,

---

[56] January 21, 2016 Comment by Guillermo D. Glenn.
[57] July 7, 2016 Meeting Comment from Graciela Martell.
[58] July 7, 2016 Meeting Comment from Saul Sustaita.
[59] January 31, 2017 Public Meeting Comment from David Stout.
[60] January 21, 2016 Public Meeting Summary at 5-6, 7, 14, 16; July 7, 2016 Public Meeting Summary at 9; January 31 Public Meeting Summary at Attachment A: Comment Response Matrix, at 3.
[61] TxDOT, January 21, 2016 Public Meeting Presentation at 4 (responding to comment).
[62] TxDOT, July 7, 2016 Meeting Summary at Attachment A: Comment Response Matrix, at 8.
[63] At the July 27, 2018 Public Hearing, TxDOT made its only mention of its traffic models, and explained the increased congestion and traffic that would occur absent the project. The traffic models were not provided. TxDOT, July 27, 2018 Public Hearing, Final Public Hearing Script at 13.
[64] *See supra* at n. 52.
[65] The importance of meaningful public participation is clearly illustrated by the fate of the Lincoln Center under the I-10 Connect Project. While TxDOT conveniently kept the public in the dark about any risks of increased traffic, TxDOT could not hide the fact that the initially preferred alternative—which was first presented in detail to the public at the January 21, 2016 public meeting—meant tearing through the Lincoln Center. In response, the public submitted an overwhelming number of comments pleading for the preservation of the Lincoln Center and rapidly engaged in grassroots action to save the historic community center. KVIA ABC-7, *TxDOT Project to Spare Lincoln Center from Demolition* (July 28, 2018),

a practice that it seemed to find adequate for the community on multiple occasions,[66] demonstrating a brazen disregard for the public information and participation rights of the San Xavier community.

Third, TxDOT misled the San Xavier community about the significant impacts of construction. TxDOT falsely claimed that extended disruption of normal activities [was] not expected" because construction "normally occurs during daylight hours" and no one was "expected to be exposed to construction noise for a long duration[.]"[67] Contrary to TxDOT's vague assurances,[68] construction went on at all hours of the day and night for months. Two residents living on opposite sides of I-10 Connect were dying from terminal cancer. Their relatives complained that the nonstop noise and vibrations from construction made it impossible to rest, but the contractor told each of them that they had to complete the project on time and could not stop making noise.

Even more alarming, TxDOT did not warn residents that construction would occur directly outside their homes and include the use of heavy machinery known to cause damage to nearby infrastructure. This failure is not surprising, as such a warning would have amounted to a bold admission that TxDOT was prepared to violate NEPA's mitigation requirements.[69] TxDOT did not provide further information when requested to do so by commenters, maintaining its misleading assurances.[70] One commenter expressed "concern" about how the "alternatives will affect the residences around the construction area."[71] TxDOT merely reiterated its misleading assurances that residents would have access to their homes during construction, omitting the fact that construction with structure-damaging equipment would occur right outside their homes.

Even more, TxDOT excluded any meaningful consideration of the short-term air quality impacts from construction in its environmental justice analysis, further

---

https://kvia.com/news/2018/07/28/txdot-project-to-spare-lincoln-center-from-demolition/. TxDOT responded by reconsidering the impacts to the Lincoln Center and eventually modifying the preferred alternative to spare the Lincoln Center. TxDOT July 7, 2016 Public Meeting Summary at Attachment F: Description of Project Modifications Resulting from the Public Meeting; TxDOT, July 27, 2018 Public Hearing, Final Public Hearing Script at 16.

[66] *See infra* at p.30. In addition, on June 28, 2023, TRLA, on behalf of its clients in the San Xavier community, sent a Public Information Act Request to TxDOT seeking, among other things, "traffic studies/modeling related to the flow of traffic from East Paisano Drive to East San Antonio Street and back to East Paisano Drive" and "traffic expected to use I-10 Connect South, heading into Mexico once it was completed," for which TxDOT provided no supporting studies in response. *See* Attachment D.

[67] TxDOT EA at 28.

[68] TxDOT claimed that: "Provisions will be included in the plans and specifications that require the contractor to make every reasonable effort to minimize construction noise through abatement measures such as work-hour controls and proper maintenance of muffler systems." *Id.*

[69] TxDOT's violation of NEPA in regards to its failure to mitigate for the significant harms caused by the construction of I-10 Connect is further discussed *infra* Section III.E.4.

[70] In its EA, TxDOT claimed that "[i]mpacts to the character or community cohesion in the project vicinity [were] not anticipated because the proposed improvements would be constructed along existing transportation corridors, and access to adjacent properties would be maintained throughout the project area." TxDOT EA at 11.

[71] January 21, 2016 Comment by Alejandra Ponce.

demonstrating a significant lack of concern for San Xavier residents. TxDOT played down the harm of construction air quality impacts and only included a brief mention of potential impacts. TxDOT acknowledged that construction activities could produce PM and MSAT emissions, primarily from fugitive dust and diesel particulate matter from diesel powered construction equipment and vehicles.[72] Yet the only explanation TxDOT provided for its claim that construction activities from the project would have no significant impact on air quality was that construction is temporary and transient, construction contractors would be encouraged—but notably, not required—to use the Texas Emissions Reduction Plan during construction, and "compliance with applicable regulatory requirements."[73] TxDOT did not elaborate further what "regulatory requirements" would be followed, nor explained how such compliance supported the claim that air quality impacts would not be significant. One commentor noted TxDOT's "glaring omission of air quality studies" and how "the impact of construction on our neighborhoods is of major concern. Please have the Jacobs Engineering provide this study."[74] TxDOT never provided any studies.

Title VI compliance demands a public involvement process that is proactive and provides complete information, timely public notice, full public access to key decisions, and an opportunity for early and continuing involvement. Continuing to ignore and withhold information from communities that have been historically disregarded and underserved only serves to cement a legacy of discriminatory decisions and deny the community an equal opportunity to participate in the planning process. TxDOT's egregious violations of NEPA in regard to meaningful public participation are so repetitive that they are indicative of discriminatory intent.

E. TxDOT Departed from the Normal Substantive Factor by Failing to Fully Evaluate the Impacts on an Environmental Justice Community.

NEPA's mandate to fully evaluate environmental justice impacts naturally supplements an agency's responsibility under Title VI. Under NEPA, "environmental justice is not merely a box to be checked," and agencies are required to thoroughly evaluate the environmental justice impacts of a proposed project, and to inform communities of all potential impacts.[75] CEQ's NEPA Guidelines specify:

> Where a potential environmental justice issue has been identified by an agency, the agency should state clearly in the EIS or EA whether, in light of all the facts and circumstances, a disproportionately high and adverse human health or environmental impact on minority populations, low-income populations, or Indian tribe is likely to result from the proposed action and any alternatives. This

[72] TxDOT EA at 23.
[73] *Id.*
[74] January 21, 2016 Comment by Xavier Miranda.
[75] *Friends of Buckingham v. St. Air Pollution Control Bd.*, 947 F.3d 68, 91–92 (4th Cir. 2020).

> statement should be supported by sufficient information for the public to understand the rationale for the conclusion.[76]

TxDOT has recognized this principle:

> EJ and Title VI are good examples of considerations that can be addressed concurrently when working through the planning and environmental phase of project development. This is because both principles seek to involve protected populations in the decision-making process, lessen adverse impacts, and more equitably distribute the benefits and burdens of transportation projects.[77]

1. TxDOT Ignored its inability to control Southbound traffic due to U.S. and Mexico Customs.

TxDOT recognized that the BOTA bears a significant role in traffic in its Project, yet nothing in the Final EA indicates that TxDOT analyzed this impact. TxDOT even claimed that I-10 Connect would involve "extensive coordination" with the BOTA,[78] but TxDOT never explained whether it ever communicated with Mexico or U.S. Customs about I-10 Connect. Indeed, nothing in TxDOT's EA indicates that it considered the POE in calculating traffic projections. Contrary to NEPA's mandate to make a fully informed decision and fully analyze environmental justice impacts, TxDOT ignored a critical factor and merely considered I-10 Connect in a vacuum.

TxDOT's promises that traffic would flow faster than it did before could not be met without the collaboration and commitment from U.S. and Mexican Customs authorities. As noted previously, TxDOT told the public that it evaluated ways to reduce the impacts of trucks to and from the Port of Entry,[79] including through its re-routing of traffic, which would allegedly "provide[] for efficient operations at the Port of Entry." [80] Yet all the information presented to the public throughout public meetings and in TxDOT's final EA omitted any actual analysis, and potentially misrepresented a crucial fact TxDOT knew: I-110 would have heavy-duty traffic it did not have before because I-10 Connect feeds traffic directly into Mexico and TxDOT has no authority to expedite inspections by U.S. or Mexican Customs.

---

[76] Council on Environmental Quality, *Environmental Justice: Guidance Under the National Environmental Policy Act*, at 15.

[77] TxDOT Environmental Affairs Division, Environmental Handbook: Community Impacts, Environmental Justice, Limited English Proficiency, and Title VI Compliance, 12-13 (December 2020) (hereinafter TxDOT Environmental Justice Handbook).

[78] Antonio Santana PE, I-10 Connect Project: Texas Department of Transportation, El Paso District, https://www.texasce.org/tce-news/i-10-connect-project-texas-department-of-transportation-el-paso-district/ (TxDOT told the public: "The I-10 Connect project consists of progressive highway design elements and involves extensive coordination with the largest US/Mexico Port of Entry in El Paso, the Bridge of the Americas (BOTA).").

[79] TxDOT, January 21, 2016 Public Meeting Presentation at 4 (responding to comment).

[80] *See supra* note 61.

Because of TxDOT's glaring omissions, San Xavier residents and the entire El Paso air quality basin must now contend with two "bridges" saturated with idling heavy duty and passenger traffic: the BOTA heading north, and I-10 Connect heading south. I-10 West, Exit 22B has become notorious with residents who use the exit to enter US-54 North and South or I-10 West, and any El Pasoan travelling through I-10 East or West can see a line of heavy-duty trucks and passenger traffic extending for miles, a phenomenon that has not existed in El Paso history until TxDOT's failed I-10 Connect Project.

2. TxDOT Improperly Segmented 1-10 Connect and Failed to Consider the Cumulative Impacts of I-10 Connect in conjunction with the GSA's planned modernization of the Bridge of the Americas.

In full contravention of NEPA, TxDOT improperly segmented the I-10 Connect project from its larger "Reimagine I-10" Project to avoid discussing the full extent of the impacts in one environmental analysis. Even more, TxDOT wrongfully omitted a discussion of the cumulative impacts of its past, present, and reasonably foreseeable projects—that is, the segments under the Reimagine I-10 Project and the BOTA Modernization Project—in its EA for the I-10 Connect Project.

Segmentation of projects is improper where actions are connected. NEPA's scoping regulations define "connected actions" as those which are closely related and must therefore be discussed in the same impact statement. Actions are connected if they:

> (i) Automatically trigger other actions which may require environmental impact statements;
> (ii) Cannot or will not proceed unless other actions are taken previously or simultaneously; or
> (iii) Are interdependent parts of a larger action and depend on the larger action for their justification.[81]

Failing to include connected components of a project in an EIS's scope of review is unlawful piecemealing or segmentation, in violation of NEPA.[82]

Relatedly, under the applicable FHWA regulations, FHWA's compliance with NEPA's prohibition against improper segmentation requires that each action:

(1) Connect to logical termini and be of sufficient length to address environmental matters on a broad scope;

---

[81] 40 C.F.R. § 1508.25 (2019); *accord id.* § 1501.9(e) (2020) (stating same).

[82] *See, e.g., Save Barton Creek Ass'n v. Fed. Highway Admin*., 950 F.2d 1129, 1140 (5th Cir.1992) ("'Segmentation' or 'piecemealing' is an attempt by an agency to divide artificially a 'major Federal action' into smaller components to escape the application of NEPA to some of its segments."); *Fritiofson v. Alexander*, 772 F.2d 1225 (5th Cir. 1985), abrogated on other grounds by *Sabine River Auth. v. U.S. Dep't of Interior*, 951 F.2d 669 (5th Cir. 1992) (requiring the preparation of a comprehensive EIS for the whole West Galveston Island in order to adequately consider "cumulative impacts" under NEPA).

(2) Have independent utility or be of independent significance; i.e. be usable and be a reasonable expenditure even if no additional transportation improvements in the area are made; and
(3) Not restrict consideration of alternatives for other reasonably foreseeable transportation improvements.[83]

When the segmentation determination is made "in the context of a highway within a single metropolitan area, as opposed to a highway connecting different cities, courts have focused primarily on whether the segment has "independent utility" and placed less emphasis on the other two factors."[84]

First, to evaluate whether a project connects logical termini, courts look to the purpose and need statement in the environmental analysis.[85] The purpose of I-10 Connect is "to reduce congestion along I-110, US 54, and US 62 (Paisano Drive) caused by queuing from the POE and thereby improve connections between I-10 and Loop 375 (Cesar Chavez Border Highway)."[86] TxDOT noted the need of the Project to address the lack of a direct connection between I-10 and Loop 375, substantial congestion due to the proximity of I-110 access points to the POE, and increased travel demand in the project area.[87] Further, in its need statement, TxDOT noted that "I-10 between N. Luna Street and Raynolds Street is a heavily traveled east-west corridor and a major connector that serves statewide and regional traffic as well as traffic within the City of El Paso."[88] While I-10 Connect does contain termini that address the need to "improve connections," it does not contain logical termini to address congestion. As noted, I-10 Connect has failed to deliver promised traffic reductions, a purpose of the project that might be better met in conjunction with the various expansions planned for TxDOT's Reimagine I-10 Project.

Second, the independent utility test asks "whether each project would have taken place in the other's absence."[89] Despite TxDOT's failure to mention Reimagine I-10 in its EA for I-10 Connect, TxDOT has clearly considered the latter as a necessary step for the implementation of its Reimagine I-10 Project. TxDOT began its corridor Study for Reimagine I-10 in 2017.[90] TxDOT has stated that the I-10 Connect Project "is intended to make it easier for motorists to use Loop 375 as an alternate route I-10 which will undergo significant reconstruction in Downtown El Paso, Central El Paso and East El Paso in the coming years."[91] Further, in its Alternatives Evaluation Matrix, TxDOT considered

[83] 23 C.F.R. 771.111(f).
[84] *N. Carolina All. for Transp. Reform, Inc. v. U.S. Dep't of Transp*., 151 F. Supp. 2d 661, 680 (M.D.N.C. 2001) (citing *Coalition on Sensible Transp., Inc. v. Dole*, 826 F.2d 60, 69 (D.C.Cir.1987); *Piedmont Heights*, 637 F.2d at 440.
[85] *Defs. of Wildlife v. N. Carolina Dep't of Transp*., 762 F.3d 374, 395 (4th Cir. 2014).
[86] TxDOT EA at 5.
[87] *Id.* at 4.
[88] *Id.*
[89] *Defs. of Wildlife*, 762 F.3d at 395 (citing *Webster v. U.S. Dep't of Agric*., 685 F.3d 411, 426 (4th Cir. 2012))
[90] TxDOT, Downtown 10 Draft Range of Alternatives at 2, available at https://www.txdot.gov/content/dam/project-sites/downtown-10/docs/draft-range-alternatives.pdf.
[91] TxDOT, *I-10 Connect: About the I-10 Connect Project*, available at https://www.i10connectelpaso.com/.

"Improved Mobility during planned I-10 Reconstruction" as one of several evaluation criteria.[92]

Even more, in its 2019 and 2020 Unified Transportation Plans ("UTP"), TxDOT explains that:

> Just east of El Paso, the I-10 Connect Project will address congestion issues near the Bridge of the Americas Port of Entry by improving mobility and keeping commuters and commercial trucks off local roadways. This complex project affects ports of entry, impacts freight traffic, and requires multistate and multinational agency coordination. The I-10 Connect Project, planned years in advance to address future needs, ***represents one in a sequence of projects to improve I-10***.(emphasis added)[93]

The 2019 and 2020 UTPs further state:

> One of the district's most immediate needs is the I-10 corridor through El Paso, which is experiencing increased traffic and population growth. District staff are currently conducting an advanced planning study called "Reimagine I-10," which will look for operational, corridor-wide, and technological solutions along the 55-mile length of the study area. I-10 carries nearly 200,000 vehicles a day along the study corridor, and because of the district's geographical location, alternative routing options are limited. Category 2 helps district efforts in this area, which are both immediate and long-term.
>
> In addition to the I-10 Connect project, several other significant projects will help achieve the district's vision of I-10 working better for Texas residents and visitors. For instance, the proposed borderland Expressway project will address I-10 capacity issues by completing a loop around the northeast side of El Paso, providing travelers with an alternative route to I-10 and potentially diverting traffic around the city center.[94]

The I-10 Connect Project is intrinsically related to project segments of Reimagine I-10 Connect, especially the downtown segment, which directly abuts the area of the I-10 Connect Project. The traffic from I-10 and I-110 cannot be viewed in isolation, and TxDOT itself, in the limited traffic information provided in its Final EA for I-10 Connect, evaluated the current and expected traffic across different stretches of I-10. While it is unclear if TxDOT accounted for its planned Reimagine I-10 project segments in any of these projections, it certainly understood that traffic on I-10 is a crucial factor for evaluating the efficacy of I-10 Connect.

---

[92] TxDOT EA at 8.
[93] TxDOT 2020 UTP at 130 (emphasis added); 2019 UTP at 123, available at https://www.txdot.gov/projects/planning/utp.html.
[94] TxDOT 2020 UTP at 132; 2019 UTP at 124.

Finally, TxDOT's isolation of I-10 Connect has restricted consideration of alternatives for other reasonably foreseeable transportation improvements. Reimagine I-10 and the BOTA Land Port of Entry Modernization Project are reasonably foreseeable transportation projects. And TxDOT's redirection of semi-trucks from Paisano Drive to I-110 in the I-10 Connect Project, alongside its dismissal of any public transportation improvement additions or alternatives, has now limited the consideration of alternatives for both future projects. For example, the BOTA Modernization Project must now contend with the increased semi-truck and POV congestion from I-10 Connect, and will be limited in any consideration of public transportation strategies that would have been more effective had they been considered in cooperation with TxDOT and in consideration of the synergistic effects the projects can have on each other. Similarly, public transportation options along the stretches of Reimagine I-10 that are most impacted by the increased semi-truck and passenger traffic from I-10 Connect may now be limited in lieu of strategies to address the novel problem of congestion that TxDOT has created.

In its I-10 Connect Project, TxDOT was presented with a viable alternative to do exactly what it had the power to do—redirect traffic—but through an alternative route that would spare the community the brunt of traffic and pollution. However, it dismissed the alternative without further consideration. TxDOT's only explanation was that redirecting traffic outside of residential areas was "outside the scope of this project," but provided no clarification as to how such an alternative could not achieve the project's purpose. TxDOT has failed in justifying its refusal to consider other alternatives and has set a dangerous precedent for the upcoming BOTA Modernization and Reimagine I-10 Projects.

Even if TxDOT properly considered I-10 Connect as a separate project—which it did not—TxDOT was still required to analyze the cumulative impacts of the entire Reimagine I-10 Project and the upcoming BOTA Modernization in connection with I-10 Connect. An EA informs whether an agency should perform an EIS, and must identify the direct, indirect, and cumulative impacts of the proposed action and consider alternative actions and their impacts.[95] TxDOT itself recognizes this within its EA.

When analyzing cumulative impacts, an agency must identify:

> (1) the area in which effects of the proposed project will be felt; (2) the impacts that are expected in that area from the proposed project; (3) other actions—past, proposed, and reasonably foreseeable—that have had or are expected to have impacts in the same area; (4) the impacts or expected impacts from these other actions; and (5) the overall impact that can be expected if the individual impacts are allowed to accumulate.[96]

Further, CEQ regulations define a cumulative impact as:

[95] 42 U.S.C. § 4332(2)(C); 40 C.F.R. §§ 1502.14, 1508.7, 1508.8.
[96] *Louisiana Crawfish Producers Ass'n-W. v. Rowan*, 463 F.3d 352, 357 (5th Cir. 2006) (citing *Fritiofson*, 772 F.2d at 1236.

> [T]he impact on the environment resulting from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions. Actions by federal, non-federal agencies, and private parties must be considered.[97]

While the regulations do not define "reasonably foreseeable," case law makes clear that agencies are required to look ahead and address actions that are "contemplated" or "potential," and need not be formal NEPA proposals that may never trigger NEPA requirements.[98] The various segments of Reimagine I-10 and the BOTA Modernization Project are indisputably foreseeable projects that will impact "the area" that I-10 Connect would have—and already has—impacted. The BOTA Modernization Project is already in the NEPA scoping phase, and TxDOT has completed a Corridor Study for Reimagine I-10 and announced that "each segment will go into a preliminary engineering (schematic) and environmental process as TxDOT prioritizes projects across the El Paso region."[99] Even more, the Downtown Segment for Reimagine I-10 has already obtained most of the estimated $750,500,000 construction funding.[100]

As I-10 Connect is impacted by traffic to and from the BOTA and I-10, any project involving the BOTA or I-10 must be considered under TxDOT's cumulative impacts analysis for I-10 Connect. The San Xavier and other Southside communities are already concerned about additional environmental impacts on their communities from the BOTA Modernization and proposed expansions of I-10. The additional traffic and air pollution that inevitably follows the expansion of highways[101] poses a significant concern affected communities, and with I-10 Connect creating a unique link between I-10 and I-110 and US-54, San Xavier residents may contend with exacerbated traffic impacts from expansions along I-10. TxDOT's complete omission of these potential impacts does not merely violate NEPA, but adds on to its substantive departures that can only be summed up to a finding of discriminatory intent.

---

[97] 32 C.F.R. § 651.16(a).

[98] *Fritiofson*, 772 F.2d at 1243, 1245; *accord*, *Kern v. U.S. Bureau of Land Management*, 284 F.3d 1062, 1077 (9th Cir. 2002) ("contemplated" actions); *Blue Mountains Biodiversity Project v. Blackwood*, 161 F.3d 1208, 1214 (9th Cir. 1988) ("potential" actions).

[99] TxDOT, Reimagine I-10: Next Steps, https://www.txdot.gov/reimaginei10/corridor-study/next-steps.html.

[100] TxDOT, 2024 UTP at 96, available at https://www.txdot.gov/projects/planning/utp.html.

[101] *See* Martin J.H. Mogridge, *The Self-Defeating Nature of Urban Road Capacity Policy: A Review of Theories, Disputes, and Available Evidence*, TRANSPORT POLICY Vol. 4, No. 1, 5-23 (1997); Noland, Robert B., and Lem L. Lewison, *A Review of the Evidence for Induced Travel and Changes in Transportation and Environmental Policy in the U.S. and the U.K.*, TRANSPORTATION RESEARCH Part D 7, 8-10, 11-15 (2002); Susan Handy, *Increasing Highway Capacity Unlikely to Relieve Traffic Congestion*, U.C. DAVIS DEPT. OF ENVT'L SCIENCE AND POLICY: POLICY BRIEF (Oct. 2015), available at https://dot.ca.gov/-/media/dot-media/programs/research-innovation-system-information/documents/final-reports/10-12-2015-ncst_brief_inducedtravel_cs6_v3.pdf); *See* Kent Hymel, *If You Build It, They Will Drive: Measuring Induced Demand for Vehicle Travel in Urban Areas*, TRANSPORT POLICY, Vol. 76, pp. 57-66 (April 2019).

3. TxDOT Failed to Analyze Air Quality Impacts.

FHWA and USDOT require state DOTs to take steps to mitigate adverse environmental effects of highway construction, including increased air and noise pollution and any adverse environmental justice effects.[102]

i. The increase in idling traffic has exposed Complainants to an increase in mobile source emissions.

I-10 Connect has resulted in the San Xavier neighborhood receiving increased exposure to mobile source air toxics due to the increased traffic flow. Numerous studies have shown that pollution from highways is very localized. These studies have also shown that those living in close proximity to the highways face significantly elevated exposure to a complex mixture of pollutants including air toxics, diesel particulate matter, and other highway emissions including tire wear, brake wear, resuspended road dust, and various metals. [103]

Living, working, or attending school near major roadways or highways has been associated with negative respiratory effects such as:

- Asthma and bronchitis: exposure to diesel exhaust can induce histamine releases that result in allergic conjunctivitis, rhinosinusitis, pharyngitis, laryngitis, and chronic cough. This exposure can also lead to degradation of lung tissue.[104] Children are especially vulnerable to chronic negative respiratory issues, as living in close proximity to highway traffic can inhibit lung development during childhood and lead to lifelong weakened lung function.[105]
- Negative cardiovascular effects: long-term exposure to air pollution from high traffic has been shown to increase incidences of coronary artery calcification[106] as well as increased coronary heart disease and strokes in women.[107]
- Adverse birth outcomes and developmental effects: living in close proximity to heavy-traffic roadways can cause an increase in term low birth weight and preterm infants.[108]

---

[102] *See*, *e.g.*, http://www.fhwa.dot.gov/environment/noise/.
[103] U.S. Environmental Protection Agency, Near-Road Air Quality Monitoring Research (Nov. 3, 2009).
[104] Irina N. Krivoshto et al., *The Toxicity of Diesel Exhaust: Implications for Primary Care*, J. AM. BOARD FAM. MED. 55, 58 (2008).
[105] W. James Gauderman et al., *Effect of Exposure to Traffic on Lung Development From 10 to 18 Years of Age: A Cohort Study*, THE LANCET 571, 574 (Jan. 26, 2007).
[106] B. Hoffman et al., *Residential Exposure to Traffic is Associated with Coronary Atherosclerosis*, 116 CIRCULATION 489 (2007).
[107] Kristin A. Miller et al., *Long-Term Exposure to Air Pollution and Incidence of Cardiovascular Events in Women*, 356 NEW ENG. J. MED. 447, 453-56 (2007).
[108] Michelle Wilhelm & Beate Ritz, *Residential Proximity to Traffic and Adverse Birth Outcomes in Los Angeles County, California, 1994-1996*, 111 ENVTL HEALTH PERSP. 207, 210-11 (2003).

- Premature mortality: epidemiological surveyors have discovered high acute and chronic respiratory disease morbidity rates from proximity exposure to diesel exhaust, as well as incidences of acute coronary syndrome (heart attacks) and ischemic effects (strokes).[109]
- Increased incidences of cancer: many emissions released by heavy traffic flow, such as diesel exhaust fumes and particulate matter, have carcinogenic properties.[110]

TxDOT discussed none of these potential impacts. Even though TxDOT failed to perform local modeling of air pollution impacts, it still contended in the Final EA that the project would actually have a minimal impact on air pollution.[111] TxDOT determined that the project did not require a PM10 and CO Hot-Spot Analysis "due to it reducing congestion and improving traffic flow, particularly at intersections."[112] These conclusions do not logically follow the fact that traffic volumes were projected to increase regardless of the project, which the project sought to address by redirecting traffic through an already-strained area without adding any capacity.[113] With I-10 Connect now completed, the holes in TxDOT's strategy became increasingly evident. Unprecedented traffic now plagues the San Xavier community, and the extent of the air quality impacts is uncertain, as TxDOT refused to consider any risks.

Despite the widely known and well-documented negative health effects associated with long-term exposure to highway emissions, TxDOT's EA does not discuss these negative health effects and how they could impact the San Xavier and other surrounding neighborhoods. This is unacceptable, given that the community has already been burdened by increased air pollution from highway construction for decades.

The history of these neighborhoods, their minority make-up, their past exposure to mobile sources of air toxins, the high diesel truck fleet mix that passes regularly through the highway, and the history of TxDOT's false claims of traffic reduction[114] demanded otherwise. TxDOT should have performed a Hot Spot Analysis, and a detailed modeling study of toxic and diesel particulate matter. Such studies would have allowed a comparison of the air pollutant impacts on local populations from the proposed alternatives.

---

[109] Irina N. Krivoshto et al., *The Toxicity of Diesel Exhaust: Implications for Primary Care*, J. AM. BOARD FAM. MED. 55, 56-59 (2008).
[110] Rachel A. Morello-Frosch, Tracey J. Woodruff, Daniel A. Axelrad, Jane C. Caldwell, Air Toxics and Health Risks in California: The Public Health Implications of Outdoor Concentrations, Risk Analysis, Volume 20 Issue 2, February 2000 (predicting 8600 excess cancer cases).
[111] TxDOT EA at 27.
[112] *Id.* at 22.
[113] *Id.*
[114] TxDOT's Loop 375 border Highway West Extension Project (Cesar Chavez Border Highway) was completed in 2019, and TxDOT's website indicates that there has been a significant increase in traffic since that road's completion in 2019. *See* https://www.txdot.gov/apps/statewide_mapping/StatewidePlanningMap.html.

TXDOT ignored over 25 years of data demonstrating that the Southside neighborhoods around the Bridge of the Americas, the ports of entry in Segundo Barrio (to the west) and the Marathon refinery (to the east) have historically had some of the worst air quality in the region.

San Xavier residents were already exposed to significant levels of air pollution, including ultrafine particulates matter (those smaller than 0.1 μm in diameter), PM2.5, PM10, and ozone before I-10 Connect's completion in December of 2021. The passage of NAFTA in 1994 led to an increase in heavy-duty and passenger traffic in the Paso del Norte air basin, which encompasses parts of Dona Ana County in New Mexico, Cd. Juarez, Chihuahua, Mexico and El Paso, Texas. This led to the creation of the Joint Advisory Committee on Air Quality as part of the La Paz Agreement and millions of dollars being spent on studying air quality in the region, with a particular emphasis on vehicle emissions.

One of the most recent studies looked at the impact of traffic from highways and the ports of entry on nearby residents' respiratory and cardiovascular health. The study began with the premise that:

> People with lower income are more likely to live in communities with higher pollution levels from traffic-related emissions. Traffic-related air emissions have been reported to have a strong association with urban air pollution and cause adverse respiratory health effects in near-road communities. Transportation parameters such as traffic density, vehicle miles traveled, and road length, as well as land-use data such as population density, land-use classification, proximity to heavy-traffic roads, distances to major point and area sources, and household income, are important variables for explaining a spatial variation of air quality and health outcomes.[115]

The study examined the short-term associations (24-, 48-, 72-, and 96-hr averages) of traffic-related air pollutants (PM2.5, PM10, NO2, and O3) with biomarkers of respiratory and cardiovascular disease in a group of uninsured participants from low-income communities in El Paso. Researchers found associations of short-term air pollutant concentrations with respiratory outcomes, which was expected. However, researchers also found associations with metabolic risk factors such as BMI, waist circumference, and fasting glucose. The study also found a correlation between PM2.5 and NO2 and respiratory risk of COPD.[116] Given the relationship between traffic-related air pollution and health outcomes, TXDOT should include bettering the health of El Pasoans in its purpose and need, or at least not worsen the health impacts.

---

[115] Association of Traffic and Related Air Pollutants on Cardiorespiratory Risk Factors from Low-Income Populations in El Paso, TX, authored by Soyoung Jeon, Juan Aguilera, Leah Whigham, and Wen-Whai Li, February 2021, available at https://www.carteeh.org/wp-content/uploads/2021/06/03-27-UTEP-Association-of-Traffic-and-Related-Air-Pollutants-on-Cardiorespiratory-Risk-Factors-from-Low-Income-Populations-in-El-Paso-TX-Jeon.pdf

[116] *Id.*

ii. Complainants are exposed to air pollution.

For PM10, El Paso has been in "Moderate Nonattainment," since 1991.[117] For the 8-hour Ozone standard, El Paso is"Attainment/Non-classifiable" due to the TCEQ's insistence that but for emissions from outside the city, El Paso is in attainment. Complaints disagree with this designation and insist that they are entitled to measures that will reduce their exposure to ozone pollution.[118]

The El Paso area had 126 days of elevated air pollution in 2020, the second worst in Texas, according to Environment Texas Research & Policy Center, Frontier Group and TexPIRG Education Fund. The report's findings mean that El Pasoans were breathing air with elevated levels of pollution on one out of every three days last year.[119] The report measured days with elevated levels of small particulate matter and elevated ozone. The El Paso area had 78 days with elevated small particulate matter and 68 days of elevated ozone.

According to TCEQ data, on 40 days in 2022, El Paso County air quality monitors rec The American Lung Association has given El Paso's an "F" ranking for ozone.[120] According to TCEQ data, on 40 days in 2022, El Paso County air quality monitors recorded ozone levels unhealthy for sensitive groups, like children, the elderly and people who are pregnant.[121] Data charted by the organization shows smog in El Paso has been on the rise since 2016.[122] Hotter temperatures contribute to ozone pollution. El Paso, like the rest of the world, has seen a dramatic increase in average temperatures in recent decades.[123] As shown by a recently created map of the heat island effect, the hottest streets in El Paso are along I-10.[124] The summer of 2023 was the hottest summer on record for El Paso.[125] The average temperature in El Paso between June and August surpassed 88 degrees Fahrenheit for the first time ever.[126] The season saw 60 days of 100-plus temperatures, including a record-shattering 44 days in a row from mid-June through the end of July.[127]

Air monitors in El Paso have recorded high levels of air pollution despite the inadequacies of the current air monitoring network in the area. The UTEP monitor was

---

[117] *Id.*
[118] https://www.tceq.texas.gov/airquality/sip/elp/elp-status.
[119] https://environmentamerica.org/texas/resources/trouble-in-the-air/.
[120] https://www.lung.org/research/sota/city-rankings/states/texas/el-paso.
[121] El Paso, *Las Cruces rank high in ozone pollution in 2023 report*, El Paso Matters (April 2023), available at https://elpasomatters.org/2023/04/25/el-paso-texas-american-lung-association-ozone-pollution-f-grade-2023/#:~:text=El%20Paso%20recorded%2040%20unhealthy,days%20than%20the%20previous%20year
[122] *Id.*
[123] https://climatexas.tamu.*edu*/files/ClimateReport-1900to2036-2021Update.
[124] Available at: https://www.utep.edu/liberalarts/sega/environmental-injustice-hurricane-harvey-in-greater-houston12.html.
[125] https://elpasomatters.org/2023/09/01/el-paso-record-summer-heat/.
[126] *Id.*
[127] *Id.*

close to Interstate 10, an identified source of particulate matter pollution in El Paso. The UTEP monitor recorded the highest ozone levels of any El Paso monitor in 2021 and consistently recorded some of the highest levels of ozone pollution in El Paso. The UTEP monitor has been down since November 2021 and is still not up.[128] Air monitoring data is crucial for understanding the existing impact of I-10 on human health and additional impacts that can be expected if I-10 is expanded. TXDOT must work with the TCEQ in reinstating the UTEP monitor immediately.

iii. Ultrafine Particulates from Heavy-Duty Vehicles are a Health hazard for San Xavier Residents and Students at Zavala Elementary.

Motor vehicle emissions usually constitute the most significant source of ultrafine particles (diameter <0.1 m) in an urban environment.[129] The highest concentrations are closest to highways, POEs, etc., and dissipate with distance.[130] Exposure to diesel-emitted particles has been linked to increased cancer risk and cardiopulmonary diseases. Because of their size (<100 nm), exposure to ultrafine particles ("UFPs") emitted from heavy-duty diesel vehicles ("HDDV") might result in greater health risks than those associated with larger particles.[131] A 2013 study found that "[c]ommercial traffic, mostly composed of HDDV, heavily influenced UFP concentrations in the BOTA vicinity."[132] The study also found that on Sundays, when commercial traffic was absent, the UFP numbers were the lowest. Populations near the BOTA's traffic zone and within 400 m are exposed to UFP's above the background level and include residents on both sides of the border, including a church and several schools, law enforcement officers, street vendors, private commuters, and commercial vehicle drivers."[133]

Jason Sarate, who oversees the city of El Paso's Air Quality Program stated, "[o]ne of the largest contributing sources to ozone in El Paso is the vehicle emissions. I think the biggest challenge is the vehicles that are idling for multiple hours at our ports of entry. When you have vehicles and semi-trucks lined up on the freeways waiting to cross into Mexico or cross into El Paso, those are real issues."[134]

---

[128] Smog in El Paso increased in summer 2022 while key air quality monitor was offline, El Paso Times, September 7, 2022, available at https://www.elpasotimes.com/story/news/local/el-paso/2022/09/07/el-paso-smog-increased-in-summer-2022-key-air-quality-monitor-offline/65467942007/.
[129] Study of Ultrafine Particles Near a Major Highway with Heavy-Duty Diesel Traffic,https://cfpub.epa.gov/si/si_public_record_Report.cfm?Lab=NCER&dirEntryId=83813.
[130] *Id.*
[131] Ultrafine Particle Levels at an International Port of Entry Between the US and Mexico: Exposure Implications for Users, Workers, and Neighbors. Hector A. Olvera, Mario Lopez, Veronica Guerrero, Humberto Garcia and Wen-Whai Li., available at https://pubmed.ncbi.nlm.nih.gov/23321858/
[132] *Id.*
[133] *Id.*
[134] El Paso, Las Cruces rank high in ozone pollution in 2023 report, El Paso Matters, April 2023, available at https://elpasomatters.org/2023/04/25/el-paso-texas-american-lung-association-ozone-pollution-f-grade-2023/#:~:text=El%20Paso%20recorded%2040%20unhealthy,days%20than%20the%20previous%20year.

4. TxDOT Failed to Mitigate Construction Impacts and Refused to Address Resident's Concerns from Construction Damages.

In addition to increasing traffic, congestion, and noise and air pollution throughout the day, TXDOT's I-10 Connect has directly impacted residents through construction activities. The demolition and construction activities, and the Project's design flaws caused structural damage to homes.. These harms include, among other things: cracks along ceilings, roofs, walls, and flooring; leaning structures, damaged plumbing; windows and doors that do not close right; and neighborhood drainage issues.

NEPA requires agencies to consider all environmental impacts from a proposed project, including impacts during construction.[135] TxDOT's Guidance for Preparing an Environmental Assessment provides that the EA "must identify and explain any impacts associated with construction activities."[136] The Guidance further requires the EA to list the "expected duration of any construction impacts," and "any [Best Management Practices] or other strategies that will be used to mitigate such impacts."[137] The Guidance also provides standard language to reduce noise impacts during construction:

> Noise associated with the construction of the project is difficult to predict. Heavy machinery, the major source of noise in construction, is constantly moving in unpredictable patterns. However, construction normally occurs during daylight hours when occasional loud noises are more tolerable. None of the receptors is expected to be exposed to construction noise for a long duration; therefore, any extended disruption of normal activities is not expected. Provisions will be included in the plans and specifications that require the contractor to make every reasonable effort to minimize construction noise through abatement measures such as work-hour controls and proper maintenance of muffler systems.[138]

TxDOT's proposed mitigation plan discarded NEPA's clear mandate and its own Guidance by failing to include mitigation measures to reduce the disproportionate harms the residents could—and did--suffer during construction.

TxDOT failed to take straightforward mitigation measures to prevent damages to complainants' homes. TxDOT failed to conduct or require a pre-assessment of the homes, soil, infrastructure, etc. in the neighborhood.[139] TxDOT allowed the contractor to use the streets in the neighborhood as a right of way for construction vehicles and heavy machinery. TxDOT also allowed the contractor to use equipment known in the industry to cause damage to homes when used in close proximity to residential structures, such as from repeated strong vibrations.

---

[135] *See Baltimore Gas & Elec. Co.*, 462 U.S. at 97.
[136] TxDOT, Environmental Handbook: Preparing an Environmental Assessment (November 2023) at 30.
[137] *Id.*
[138] *Id.*
[139] Exhibit E: TxDOT's letter to State Senator Cesar Blanco; TxDOT response to PIA request.

TxDOT also neglected to mitigate the increased noise impacts from construction and increased traffic that San Xavier residents faced and continue to endure. Populations that live in close proximity to noise can suffer various adverse health effects. Acute exposure to noise can cause increased blood pressure, heart rate, and release of stress hormones.[140] Furthermore, exposure to normal urban levels of noise during the night has been associated with sleep disturbances.[141] Residential exposure to road traffic noise is also associated with a risk of stroke, with a 14% higher risk per 10 decibels higher exposure.[142] Two residents were dying from cancer at the time of I-10's construction. Their relatives pleaded with TxDOT's contractor to please stop working at night so that they may have rest. The contractor refused.

To address increased noise from traffic, TxDOT only provided noise barriers for sixteen residences, leaving the vast majority of residences impacted by the increased traffic and noise from the project with no mitigation measures.[143] TxDOT further determined that the construction of a visual barrier—which could have mitigated some of the impacts San Xavier residents currently face—was not necessary since the project would be aesthetically compatible with "existing transportation features[.]"[144] Yet the increased traffic and endless queuing of vehicles that the project has caused comes with—in addition to the air pollution and noise disturbances—a visual toll for the San Xavier neighborhood.

Notably, TXDOT never warned residents that the construction would be ongoing 24 hours a day, 7 days a week. Throughout the public meetings, TxDOT failed to make a single mention of potential construction impacts. After construction began, and the dangers became clear to residents, residents asked TxDOT for a meeting. TxDOT proceeded to give them a PowerPoint about the wonders of the I-10 Connect. Only after TRLA requested information about filing a complaint did TxDOT inform residents about the process. After San Xavier residents filed formal complaints, TxDOT denied any responsibility and closed their complaints.

TXDOT has also failed to address its removal of street lighting, the new traffic accident hot spots, and the new San Antonio Street entrance, which is confusing to drivers and is full of debris and runoff. The neighborhood must now also contend with ongoing drainage issues. Since the haphazard construction of I-10 Connect, San Xavier residents have faced repeated flooding that was not present before. After rain events, water collects in puddles near homes that continues to damage the foundation of the homes because the rainwater collection site was built with the wrong pitch. TxDOT's

---

[140] H. Ising, B. Kruppa, *Health Effects Caused by Noise: Evidence in the Literature From the Past 25 Years*, NOISE HEALTH 5, 5-13 (2004).
[141] H.M. Miedema, H. Vos, *Associations Between Self-Reported Sleep Disturbance and Environmental Noise Based on Reanalyses of Pooled Data From 24 Studies*, BEHAV. SLEEP MED. 1, 1-20 (2007).
[142] Mette Sorensen et al., *Road Traffic Noise and Stroke: A Prospective Cohort Studey*, EUROPEAN HEART JOURNAL 737, 740-41 (Jan. 2011).
[143] TxDOT EA at 24; TxDOT Traffic Noise Analysis Technical Report: I-10 Connect From Yandell Drive to Loop 375 (Cesar Chavez Border Highway, El Paso County, Texas (September 2017).
[144] TxDOT EA at 14.

failure to adequately plan for altered hydraulics in a FEMA 100-year floodplain is unacceptable. TxDOT claimed that the "project would not result in adverse direct or indirect effects on the floodplain[.]"[145]

TxDOT cannot now claim ignorance to avoid the clear discrimination it has inflicted on San Xavier, for it was given ample opportunity to rectify and prevent many of the harms caused by I-10 Connect. While the chosen alternative was set in stone once construction commenced, the full extent of the damage to properties and stormwater drainage infrastructure could have been minimized. Residents became aware of the full extent of harm posed by ongoing construction in their neighborhood and raised the alarm to TxDOT, but TxDOT repeatedly turned a blind eye and denied any wrongdoing. This flagrant and repetitive pattern of dismissing San Xavier resident's concerns and ongoing harms demonstrates a clear discriminatory intent.

5. Deficient Environmental Justice Analysis.

TxDOT's EA is woefully deficient in its environmental justice analysis. As discussed above, the project has numerous impacts on the San Xavier neighborhood—an environmental justice community. In its EA, TxDOT merely recites the obvious fact that the project is predominantly located around environmental justice communities, without acknowledging the history of highway pollution, let alone the potential impacts of the project, such as increased air pollution.[146] Numerous commentors asked TxDOT to take the community into consideration, highlighting the many struggles of having to deal with a legacy of environmental pollution.[147] However, TxDOT's only mention of community impacts occurred within a perfunctory overview of the displacement of one commercial property, and two sentences on the unsupported guarantees of the project:

> In addition, one of the primary objectives of the project is to address regional traffic utilizing local roadways in the adjacent EJ neighborhoods. The proposed project is intended to improve mobility and reduce congestion, which can also reduce vehicle idling and thereby potentially reduce emissions.[148]

TxDOT's blatant omission is in clear contravention of NEPA's environmental justice analysis requirements, and TxDOT's duties under Title VI. Even TxDOT's own Environmental Justice and Title VI Compliance Handbook acknowledges the history of

[145] *Id.* at 18.
[146] TxDOT EA at 13.
[147] Hilda Villegas, a longtime community organizer and advocate for the Chamizal community group Familias Unidas del Chamizal, noted: "Families, women, and our Barrios suffered after Nafta was signed, and are still feeling the effects. Our communities should not have to pay once more to accommodate these transnational. Completing any alternative that proposes to go through any Barrio would contribute to the destruction of our environment, history, culture, and existence. July 7, 2016 Public Meeting Comment by Hilda Villegas; Another commentor echoed this sentiment, noting that "there should be a solution to the maquila trucks entering the free bridge from Paisano. There should be other alternatives that do not take all the traffic through the Mexican American Barrios." January 21, 2016 Comment by Guillermo D. Glenn.
[148] TxDOT EA at 13.

discrimination in waste and industrial sightings, and provides for the Community Impact Analysis to ensure "recurring burdens" are not unjustly imposed on underserved populations like San Xavier.[149] TxDOT's Handbook further requires that all EJ mitigation commitments are clearly listed in the CIA technical report and the EA/EIS, as applicable."[150] Yet TxDOT made no mitigation commitments beyond a few noise barriers, leaving the community to trust in the anticipated traffic benefits of the project, benefits which never came.

TxDOT also refused to analyze the full extent of traffic impacts, including through its severe failure to account for the impact of Mexican and U.S. Customs. TxDOT's claims that it was "evaluating options to reduce the impacts of trucks to and from the Port of Entry" and dutifully considering ways to minimize impacts to the environmental justice communities ring hollow in the face of its numerous glaring omissions under NEPA. TxDOT's perfunctory environmental justice analysis marks a fitting summation of its effort to evaluate the project's impacts and provide the community with adequate information under NEPA. Even a conservative inference of the plethora of TxDOT's failures and demonstration of apathy and neglect to the San Xavier community can only lead to a finding of intentional discrimination.

F. DISPARATE IMPACT

TxDOT's I-10 Connect project has had a disproportionate impact on a protected group, further cementing the history of past discrimination. TxDOT could have avoided this by addressing the history of past projects and by admitting its own limitations, including its inability to control U.S. and Mexican Customs. Instead, TxDOT short-circuited the process by stating it did not have to evaluate the impact further because the project would reduce traffic, and no one was being displaced. By failing to fully evaluate the impacts of its proposed alternative and failing to justify its refusal to evaluate an alternative that would avoid sending POE traffic through environmental justice neighborhoods, TxDOT violated Title VI. Even if TxDOT establishes a "legitimate need" for the project, there were "less discriminatory alternatives" available, mentioned by commentors, and reiterated here—namely, to remove heavy truck traffic from the POE or redirect heavy truck traffic away from the neighborhoods and to implement a robust public transportation alternative along that stretch of the highway. DOJ Title VI Manual § VIII(B). As with its failure to fully consider the history of past discrimination, TxDOT failed to seriously consider any alternative to remedy past discrimination or at least prevent its continuation and exacerbation.

As extensively discussed above, the residents of the San Xavier neighborhood are disproportionately suffering from the harmful impacts of I-10 Connect. TxDOT failed to properly evaluate and mitigate the impacts that the I-10 Connect Project has had on communities, including increased air and noise pollution, increased traffic, damage to properties, and ongoing flooding and other infrastructure problems.

[149] TxDOT Environmental Justice Handbook at 12.
[150] *Id.* At 15.

IV. DOT and FHWA Should Take All Necessary Steps to Correct TxDOT's Violations of Title VI.

For the reasons set forth above, TxDOT is not in compliance with Title VI of the Civil Rights Act of 1964. Accordingly, FHWA should take all necessary steps to ensure that TxDOT comes into full compliance with the requirements of Title VI pursuant to the FHWA and DOT's powers under 23 C.F.R. § 200.11, 28 C.F.R. § 42.108, and 49 C.F.R. § 21.13. If necessary, such steps should include launching an investigation, discontinuing all present and future federal funding to TxDOT for road projects, including the I-10 Connect Project, requiring TxDOT to take any necessary steps to comply with Title VI into the future, and/or referring the matter to the U.S. Department of Justice for further investigation. *See* 49 C.F.R. § 21.23.

Complainants request that:

1. Homeowners whose homes were damaged by I-10 Connect be compensated financially;
2. The neighborhood's infrastructure be repaired (flooding, car accident hot spot, debris, noise, etc.);
3. 18-wheelers be prohibited from using I-10 Connect;
4. TxDOT adopt and enforce written construction rules that will prevent future harm, including a prohibition of the use of heavy machinery known to cause vibrations that can damage residential structures within a certain proximity; pre-assessments of nearby homes; and pre-assessments of the soil composition;
5. TxDOT adopt and enforce requirements to ensure the full dissemination of information to communities during and after the public participation process;
6. TxDOT support the Complainant's requests as part of the upcoming BOTA NEPA process to remove 18-wheelers from BOTA heading both north and south and incorporating a robust public transportation component to the GSA's modernization of the Port of Entry and nearby areas; and
7. A comprehensive health study and monitoring of residents close to I-10 Connect.

Thank you for your prompt attention to prevent further discrimination related to the I-10 Connect Project. Please let us know if we can provide any additional information to assist FHWA in addressing these serious concerns.

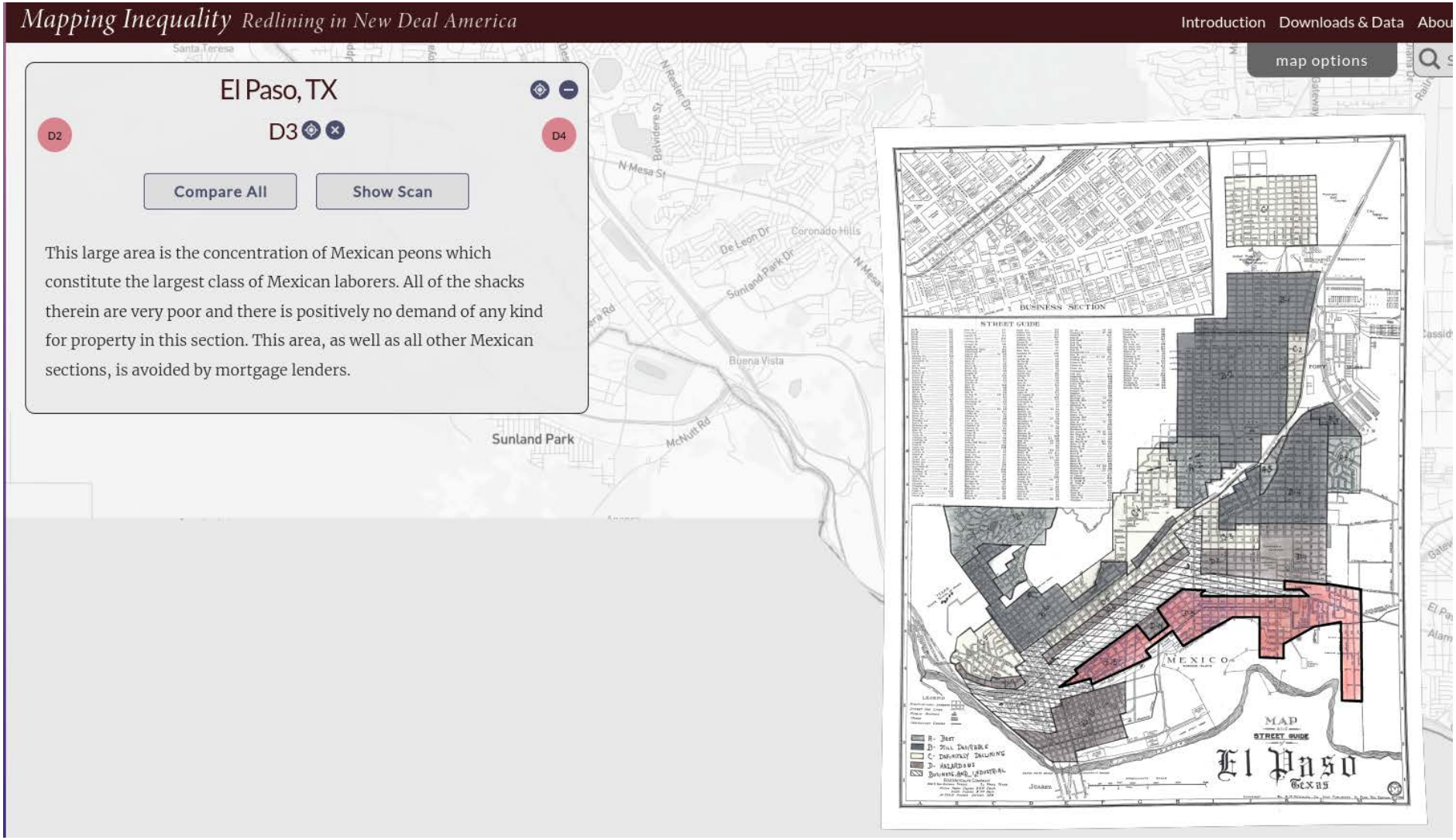
Respectfully Submitted,

TEXAS RIOGRANDE LEGAL AID, INC.
1331 Texas Ave.
El Paso, TX 79901

/s/ Paola Camacho
Paola Camacho
Attorney at Law
State Bar No. SC105267
Tel: (915) 585-5118
Fax: (915) 544-3789
E-mail: pcamacho@trla.org

/s/ Verónica Carbajal
Verónica Carbajal
Attorney at Law
TX State Bar No. 24045617
Tel: (915) 585-5107
Fax: (915) 544-3789
E-mail: vcarbajal@trla.org

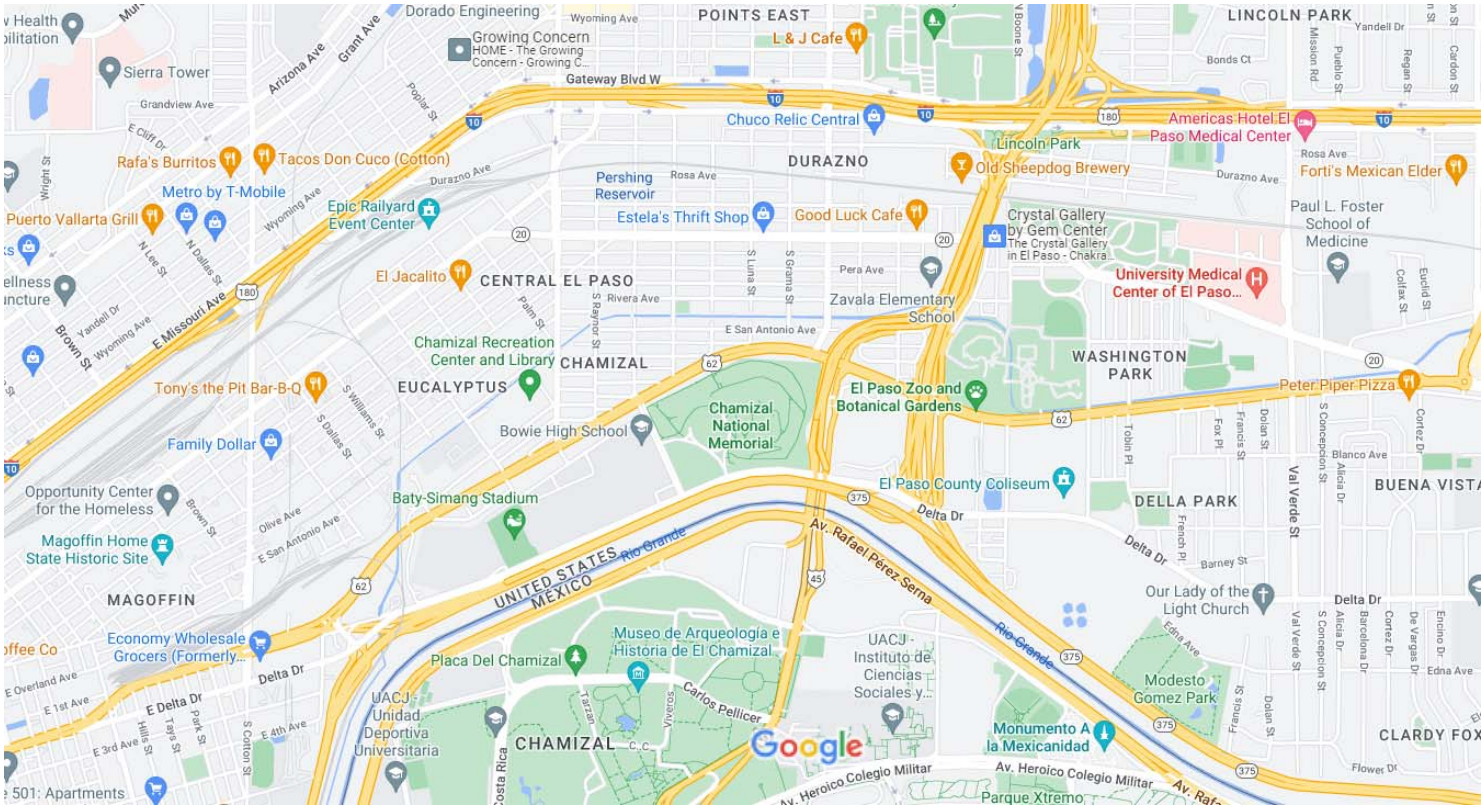
EXHIBIT A



Mapping Inequality, Robert K. Nelson and Edward L. Ayers, accessed July 7, 2023, https://dsl.richmond.edu/panorama/redlining/

EXHIBIT B

Google Maps



Map data ©2023 Google, INEGI 200 m

EXHIBIT C

EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

El Paso, TX

Tract: 48141002900
Population: 1,134
Area in square miles: 0.50

A3 Landscape

LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	5%
Spanish	92%
French, Haitian, or Cajun	1%
Chinese (including Mandarin, Cantonese)	1%
Total Non-English	95%

COMMUNITY INFORMATION

Low income: 76 percent
People of color: 97 percent
Less than high school education: 47 percent
Limited English households: 44 percent
Unemployment: 5 percent
Persons with disabilities: 22 percent
Male: 57 percent
Female: 43 percent
74 years
Average life expectancy
$13,126
Per capita income
Number of households: 517
Owner occupied: 31 percent

BREAKDOWN BY RACE

White: 3%
Black: 0%
American Indian: 0%
Asian: 2%
Hawaiian/Pacific Islander: 0%
Other race: 0%
Two or more races: 0%
Hispanic: 95%

BREAKDOWN BY AGE

From Ages 1 to 4	5%
From Ages 1 to 18	19%
From Ages 18 and up	81%
From Ages 65 and up	28%

LIMITED ENGLISH SPEAKING BREAKDOWN

Speak Spanish	93%
Speak Other Indo-European Languages	0%
Speak Asian-Pacific Island Languages	7%
Speak Other Languages	0%

Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race.
Source: U.S. Census Bureau, American Community Survey (ACS) 2017-2021. Life expectancy data comes from the Centers for Disease Control.

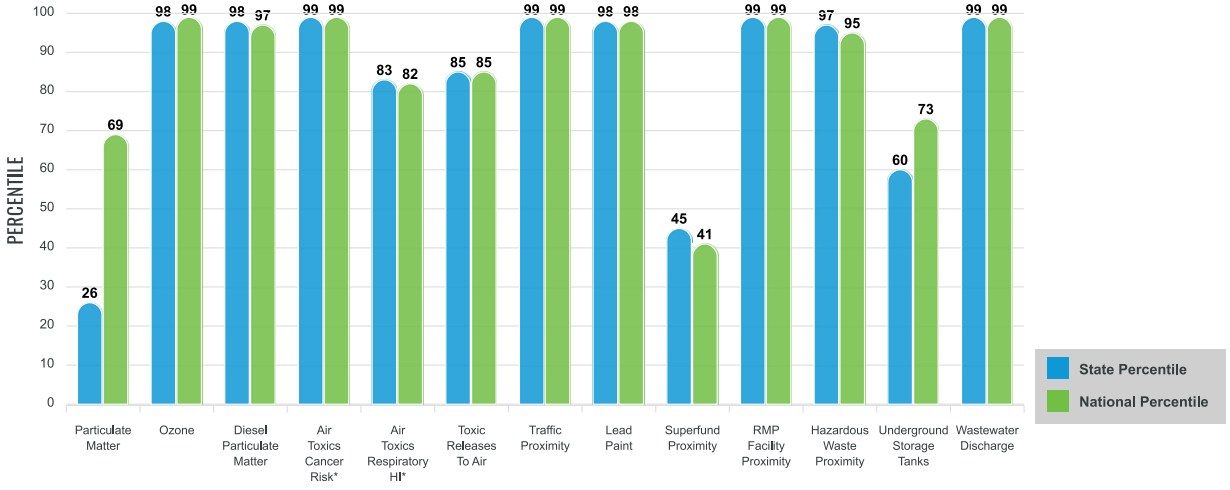
Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the EJScreen website.

EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

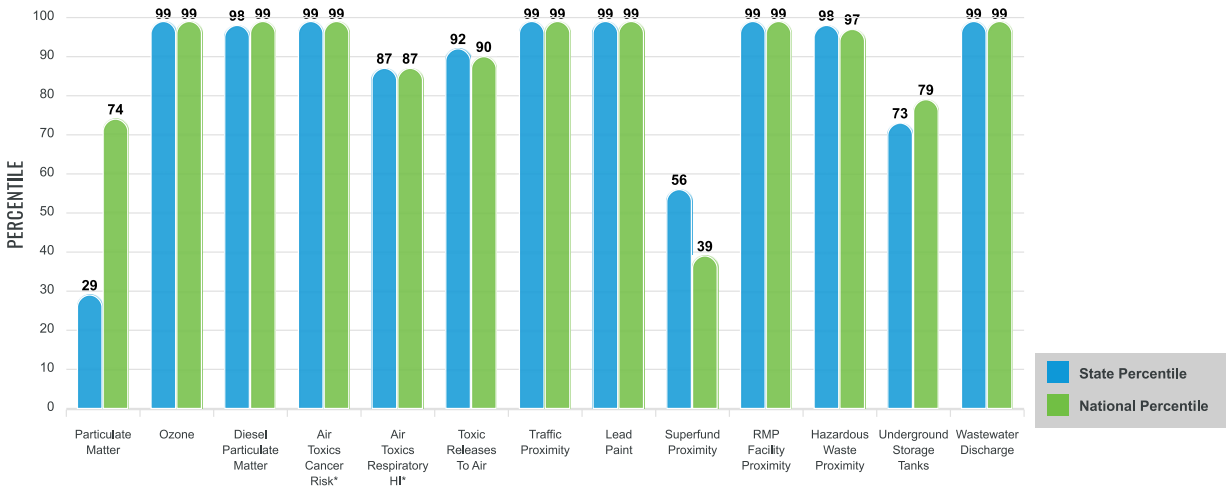
EJ INDEXES FOR THE SELECTED LOCATION



SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.

SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

Report for Tract: 48141002900

EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
POLLUTION AND SOURCES					
Particulate Matter (µg/m^3)	7.23	9.11	8	8.08	25
Ozone (ppb)	69.9	64.6	88	61.6	93
Diesel Particulate Matter (µg/m^3)	0.352	0.218	89	0.261	77
Air Toxics Cancer Risk* (lifetime risk per million)	40	28	89	25	94
Air Toxics Respiratory HI*	0.3	0.3	29	0.31	31
Toxic Releases to Air	370	12,000	53	4,600	41
Traffic Proximity (daily traffic count/distance to road)	1,200	150	99	210	96
Lead Paint (% Pre-1960 Housing)	0.58	0.17	91	0.3	78
Superfund Proximity (site count/km distance)	0.015	0.085	17	0.13	10
RMP Facility Proximity (facility count/km distance)	2	0.63	93	0.43	96
Hazardous Waste Proximity (facility count/km distance)	1.5	0.75	85	1.9	69
Underground Storage Tanks (count/km^2)	1.1	2.3	43	3.9	49
Wastewater Discharge (toxicity-weighted concentration/m distance)	1.5	0.91	97	22	92
SOCIOECONOMIC INDICATORS					
Demographic Index	87%	46%	96	35%	98
Supplemental Demographic Index	40%	17%	97	14%	98
People of Color	97%	58%	90	39%	94
Low Income	76%	34%	95	31%	96
Unemployment Rate	5%	5%	63	6%	61
Limited English Speaking Households	44%	8%	97	5%	98
Less Than High School Education	47%	16%	94	12%	98
Under Age 5	5%	6%	42	6%	49
Over Age 64	28%	14%	90	17%	86
Low Life Expectancy	24%	20%	89	20%	87

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: https://www.epa.gov/haps/air-toxics-data-update.

Sites reporting to EPA within defined area:

Superfund 0
Hazardous Waste, Treatment, Storage, and Disposal Facilities 0
Water Dischargers 1
Air Pollution 0
Brownfields 0
Toxic Release Inventory 1

Other community features within defined area:

Schools 1
Hospitals 0
Places of Worship 1

Other environmental data:

Air Non-attainment . . . . . Yes
Impaired Waters . . . . . Yes

Selected location contains American Indian Reservation Lands* . . . . . No
Selected location contains a "Justice40 (CEJST)" disadvantaged community . . . . . Yes
Selected location contains an EPA IRA disadvantaged community . . . . . Yes

Report for Tract: 48141002900

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	24%	20%	89	20%	87
Heart Disease	9.9	5.9	97	6.1	97
Asthma	10.8	9.2	93	10	75
Cancer	4.2	5.2	29	6.1	14
Persons with Disabilities	20.5%	12.3%	90	13.4%	87

CLIMATE INDICATORS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	10%	10%	73	12%	64
Wildfire Risk	0%	30%	0	14%	0

CRITICAL SERVICE GAPS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	53%	15%	97	14%	98
Lack of Health Insurance	28%	18%	83	9%	97
Housing Burden	No	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	No	N/A	N/A	N/A	N/A

Footnotes

Report for Tract: 48141002900

EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

El Paso, TX

Tract: 48141002800
Population: 3,892
Area in square miles: 0.93

A3 Landscape

LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	8%
Spanish	92%
Total Non-English	92%

COMMUNITY INFORMATION

- Low income: 89 percent
- People of color: 99 percent
- Less than high school education: 57 percent
- Limited English households: 51 percent
- Unemployment: 5 percent
- Persons with disabilities: 18 percent
- Male: 48 percent
- Female: 52 percent
- 75 years — Average life expectancy
- $8,533 — Per capita income
- Number of households: 1,399
- Owner occupied: 24 percent

BREAKDOWN BY RACE

- White: 1%
- Black: 0%
- American Indian: 0%
- Asian: 0%
- Hawaiian/Pacific Islander: 0%
- Other race: 0%
- Two or more races: 0%
- Hispanic: 99%

BREAKDOWN BY AGE

From Ages 1 to 4	10%
From Ages 1 to 18	35%
From Ages 18 and up	65%
From Ages 65 and up	13%

LIMITED ENGLISH SPEAKING BREAKDOWN

Speak Spanish	100%
Speak Other Indo-European Languages	0%
Speak Asian-Pacific Island Languages	0%
Speak Other Languages	0%

Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race.
Source: U.S. Census Bureau, American Community Survey (ACS) 2017-2021. Life expectancy data comes from the Centers for Disease Control.

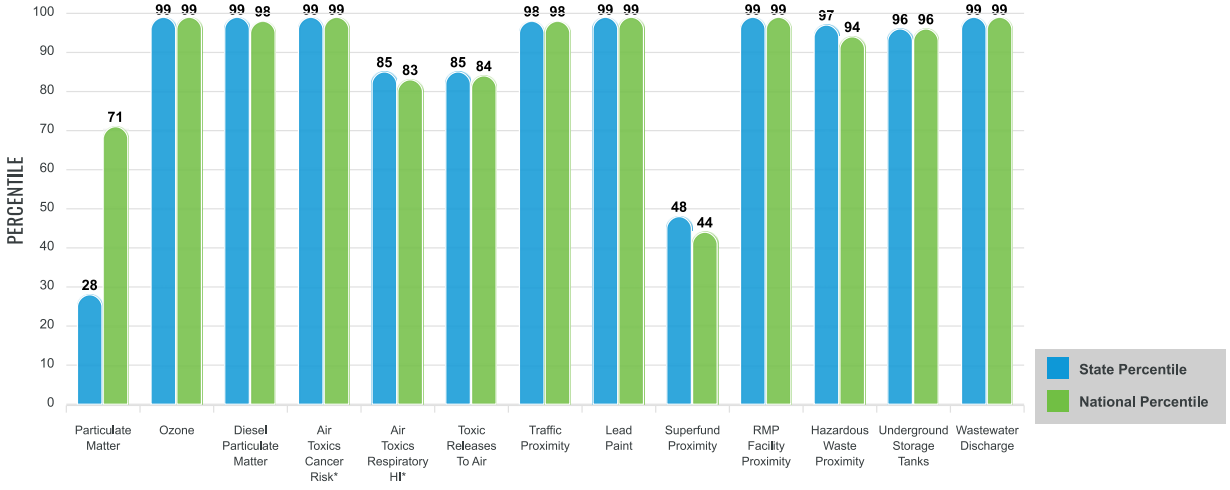
Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the EJScreen website.

EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

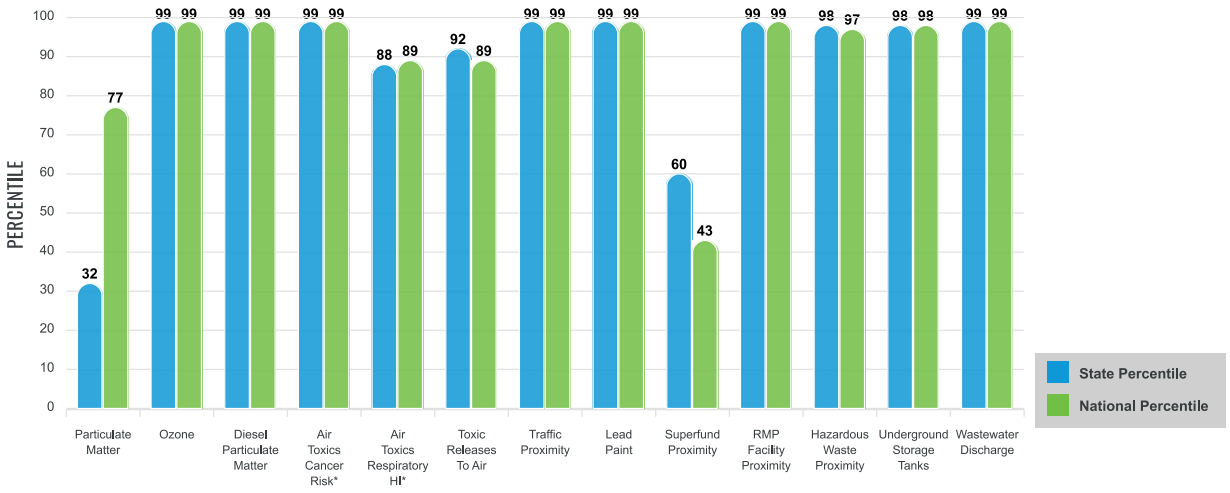
EJ INDEXES FOR THE SELECTED LOCATION



SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.

SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

Report for Tract: 48141002800

EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
POLLUTION AND SOURCES					
Particulate Matter ($\mu g/m^3$)	7.24	9.11	8	8.08	25
Ozone (ppb)	70.3	64.6	91	61.6	94
Diesel Particulate Matter ($\mu g/m^3$)	0.353	0.218	89	0.261	77
Air Toxics Cancer Risk* (lifetime risk per million)	40	28	89	25	94
Air Toxics Respiratory HI*	0.3	0.3	29	0.31	31
Toxic Releases to Air	270	12,000	48	4,600	36
Traffic Proximity (daily traffic count/distance to road)	380	150	91	210	87
Lead Paint (% Pre-1960 Housing)	0.7	0.17	95	0.3	86
Superfund Proximity (site count/km distance)	0.015	0.085	17	0.13	10
RMP Facility Proximity (facility count/km distance)	1.7	0.63	91	0.43	95
Hazardous Waste Proximity (facility count/km distance)	1.1	0.75	78	1.9	62
Underground Storage Tanks (count/km^2)	3.9	2.3	79	3.9	72
Wastewater Discharge (toxicity-weighted concentration/m distance)	1.5	0.91	97	22	92
SOCIOECONOMIC INDICATORS					
Demographic Index	94%	46%	99	35%	99
Supplemental Demographic Index	44%	17%	98	14%	99
People of Color	99%	58%	94	39%	96
Low Income	89%	34%	98	31%	99
Unemployment Rate	5%	5%	59	6%	57
Limited English Speaking Households	51%	8%	98	5%	98
Less Than High School Education	57%	16%	97	12%	99
Under Age 5	10%	6%	77	6%	84
Over Age 64	13%	14%	52	17%	38
Low Life Expectancy	23%	20%	80	20%	79

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: https://www.epa.gov/haps/air-toxics-data-update.

Sites reporting to EPA within defined area:

Superfund 0
Hazardous Waste, Treatment, Storage, and Disposal Facilities 0
Water Dischargers 6
Air Pollution 0
Brownfields 0
Toxic Release Inventory 0

Other community features within defined area:

Schools 1
Hospitals 0
Places of Worship 3

Other environmental data:

Air Non-attainment . . . . . Yes
Impaired Waters . . . . . No

Selected location contains American Indian Reservation Lands* . . . . . No
Selected location contains a "Justice40 (CEJST)" disadvantaged community . . . . . Yes
Selected location contains an EPA IRA disadvantaged community . . . . . Yes

Report for Tract: 48141002800

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	23%	20%	80	20%	79
Heart Disease	10.6	5.9	98	6.1	98
Asthma	11.4	9.2	96	10	85
Cancer	4.3	5.2	32	6.1	15
Persons with Disabilities	16.6%	12.3%	78	13.4%	73

CLIMATE INDICATORS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	5%	10%	52	12%	41
Wildfire Risk	0%	30%	0	14%	0

CRITICAL SERVICE GAPS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	39%	15%	92	14%	94
Lack of Health Insurance	45%	18%	98	9%	99
Housing Burden	No	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	No	N/A	N/A	N/A	N/A

Footnotes

Report for Tract: 48141002800

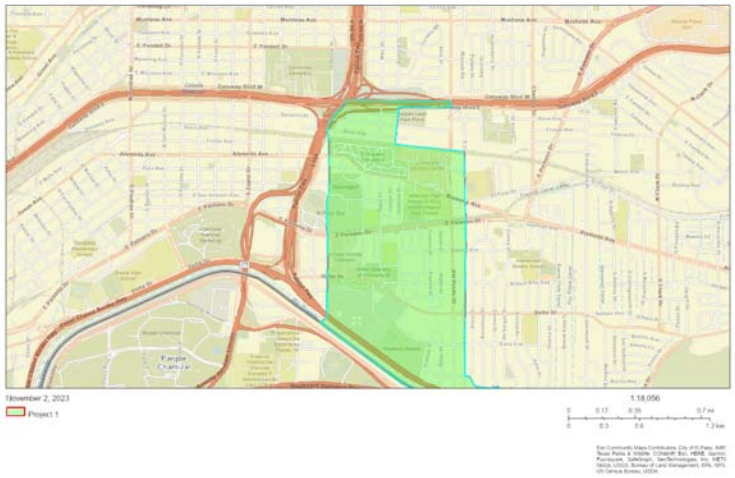
EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

El Paso, TX

Tract: 48141003000
Population: 4,196
Area in square miles: 1.03

A3 Landscape



LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	12%
Spanish	87%
French, Haitian, or Cajun	1%
Total Non-English	88%

COMMUNITY INFORMATION

Low income: 75 percent	People of color: 98 percent	Less than high school education: 49 percent	Limited English households: 44 percent
Unemployment: 10 percent	Persons with disabilities: 28 percent	Male: 46 percent	Female: 54 percent
80 years Average life expectancy	$10,164 Per capita income	Number of households: 1,167	Owner occupied: 29 percent

BREAKDOWN BY RACE

White: 2%	Black: 0%	American Indian: 0%	Asian: 0%
Hawaiian/Pacific Islander: 0%	Other race: 1%	Two or more races: 6%	Hispanic: 90%

BREAKDOWN BY AGE

From Ages 1 to 4	12%
From Ages 1 to 18	39%
From Ages 18 and up	61%
From Ages 65 and up	14%

LIMITED ENGLISH SPEAKING BREAKDOWN

Speak Spanish	100%
Speak Other Indo-European Languages	0%
Speak Asian-Pacific Island Languages	0%
Speak Other Languages	0%

Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race.
Source: U.S. Census Bureau, American Community Survey (ACS) 2017-2021. Life expectancy data comes from the Centers for Disease Control.

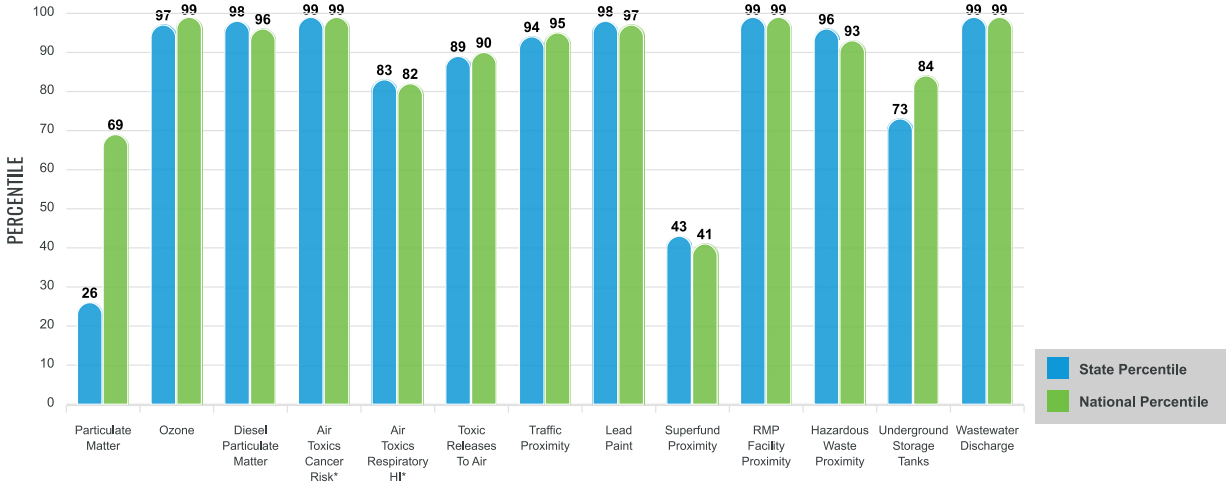
Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the EJScreen website.

EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

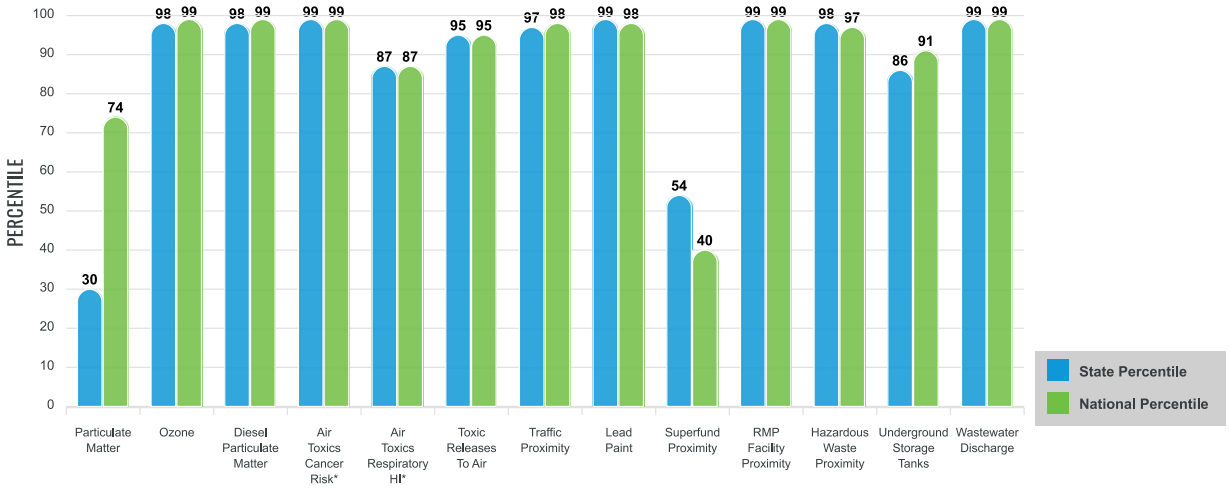
EJ INDEXES FOR THE SELECTED LOCATION



SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.

SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

Report for Tract: 48141003000

EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
POLLUTION AND SOURCES					
Particulate Matter ($\mu g/m^3$)	7.23	9.11	8	8.08	25
Ozone (ppb)	69.5	64.6	84	61.6	93
Diesel Particulate Matter ($\mu g/m^3$)	0.346	0.218	88	0.261	76
Air Toxics Cancer Risk* (lifetime risk per million)	40	28	89	25	94
Air Toxics Respiratory HI*	0.3	0.3	29	0.31	31
Toxic Releases to Air	680	12,000	61	4,600	52
Traffic Proximity (daily traffic count/distance to road)	250	150	84	210	79
Lead Paint (% Pre-1960 Housing)	0.56	0.17	90	0.3	77
Superfund Proximity (site count/km distance)	0.015	0.085	16	0.13	10
RMP Facility Proximity (facility count/km distance)	2.1	0.63	93	0.43	96
Hazardous Waste Proximity (facility count/km distance)	1.3	0.75	82	1.9	66
Underground Storage Tanks (count/km^2)	1.5	2.3	51	3.9	54
Wastewater Discharge (toxicity-weighted concentration/m distance)	1.8	0.91	98	22	93
SOCIOECONOMIC INDICATORS					
Demographic Index	86%	46%	96	35%	98
Supplemental Demographic Index	40%	17%	98	14%	98
People of Color	98%	58%	91	39%	95
Low Income	75%	34%	94	31%	96
Unemployment Rate	10%	5%	82	6%	81
Limited English Speaking Households	44%	8%	97	5%	98
Less Than High School Education	49%	16%	94	12%	98
Under Age 5	12%	6%	88	6%	92
Over Age 64	14%	14%	56	17%	42
Low Life Expectancy	18%	20%	30	20%	38

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: https://www.epa.gov/haps/air-toxics-data-update.

Sites reporting to EPA within defined area:

Superfund 0
Hazardous Waste, Treatment, Storage, and Disposal Facilities 0
Water Dischargers 9
Air Pollution 0
Brownfields 0
Toxic Release Inventory 0

Other community features within defined area:

Schools 2
Hospitals 2
Places of Worship 1

Other environmental data:

Air Non-attainment ..... Yes
Impaired Waters ..... Yes

Selected location contains American Indian Reservation Lands* ..... No
Selected location contains a "Justice40 (CEJST)" disadvantaged community ..... Yes
Selected location contains an EPA IRA disadvantaged community ..... Yes

Report for Tract: 48141003000

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	18%	20%	30	20%	38
Heart Disease	9.3	5.9	95	6.1	94
Asthma	9.9	9.2	78	10	52
Cancer	4.8	5.2	44	6.1	22
Persons with Disabilities	24.8%	12.3%	96	13.4%	94

CLIMATE INDICATORS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	2%	10%	30	12%	22
Wildfire Risk	0%	30%	0	14%	0

CRITICAL SERVICE GAPS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	24%	15%	77	14%	81
Lack of Health Insurance	27%	18%	79	9%	97
Housing Burden	No	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	No	N/A	N/A	N/A	N/A

Footnotes

Report for Tract: 48141003000

EXHIBIT D

Photographs of traffic on I-110

Photo of southbound traffic on I-110 next to Zavala Elementary, Sept. 28, 2022, 8:15a MT

Photo of southbound traffic on I-110 next to Zavala Elementary/San Xavier, November 29, 2022, 2p MT

Photo of southbound traffic on I-110 next to Zavala Elementary/San Xavier, November 29, 2022, 7p MT

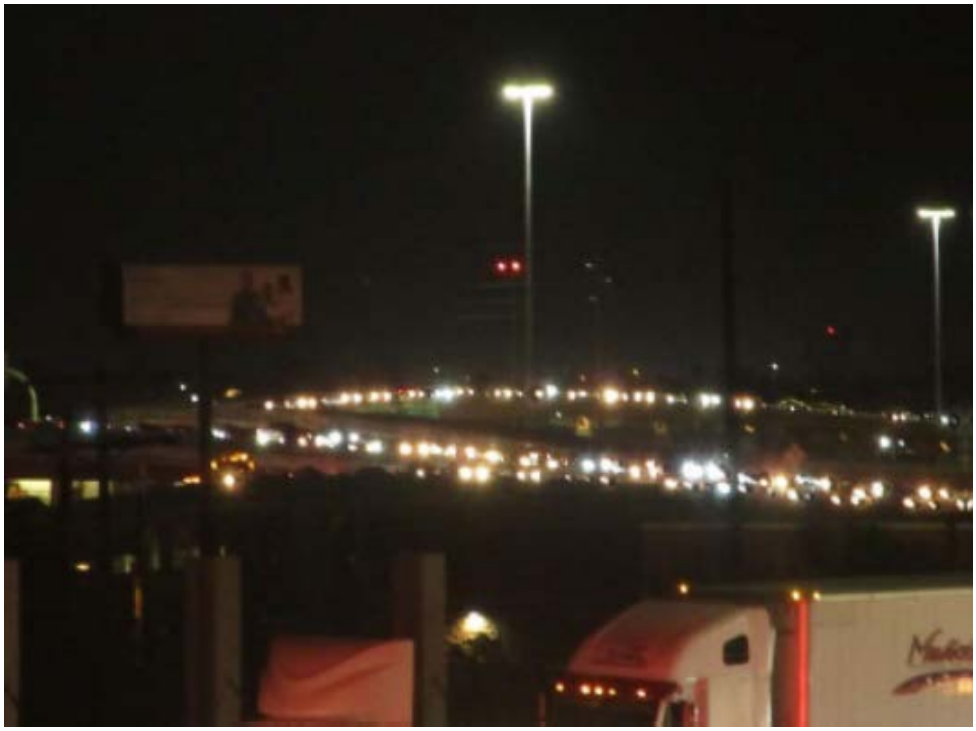


Photo of southbound traffic on I-110 next to Zavala Elementary/San Xavier, November 29, 2022, 7p MT

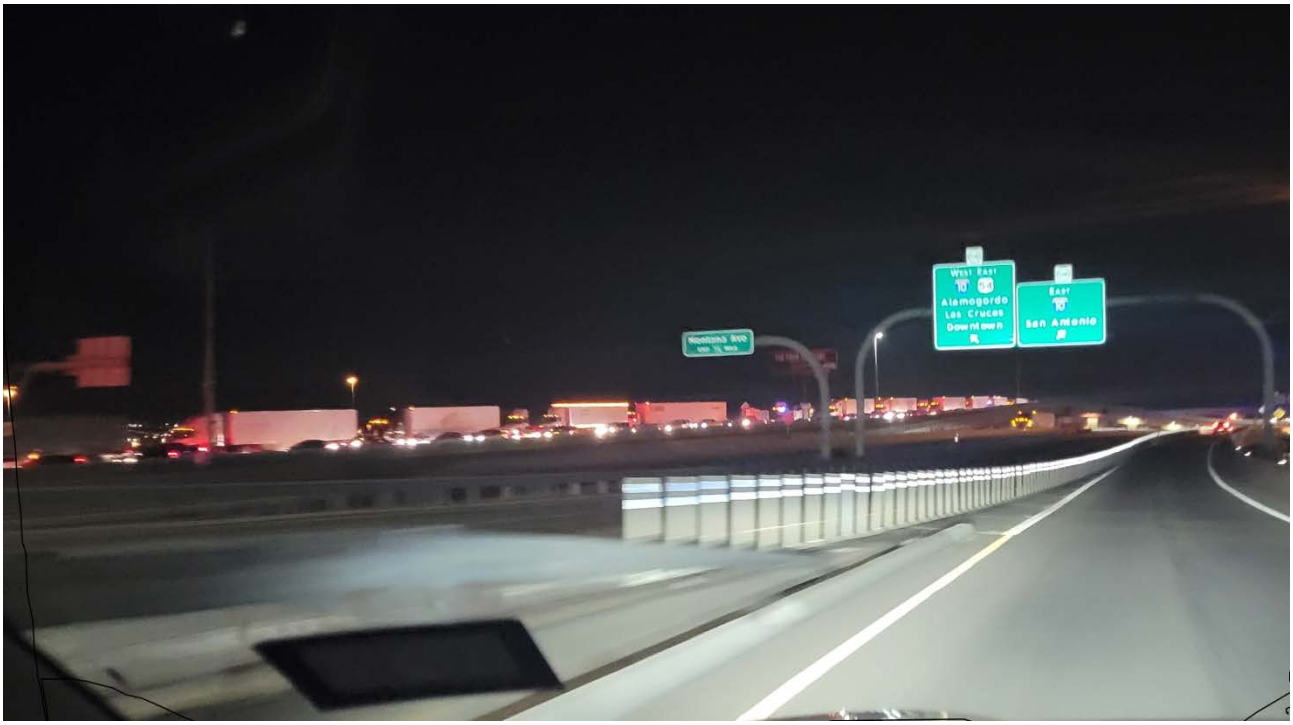


Photo of southbound traffic on I-110 next to Zavala Elementary/San Xavier, November 1, 2023, 7:50p MT

Screenshot of social media post on Instagram by @therealfitfamelpaso on November 3, 2023.

Photo of TxDOT traffic warning sign on I-10 West, January 21, 2023 at 2:13p MT.

EXHIBIT E

From: Tomas Trevino
To: Alejandra Villarreal
Subject: Re: San Xavier Community
Date: Friday, February 3, 2023 8:54:24 AM

Good morning Alejandra,

Before accepting any project we perform a final walk through with the contractor. We do this to assure that the terms and conditions of the contract have been met. We do not perform a walk-through of the adjacent neighborhoods as they are not part of any contract and are outside our right of way. Please let me know if you need anything else.

Thanks

Tomas Trevino
El Paso District Engineer

From: Alejandra Villarreal
Sent: Friday, February 3, 2023 9:44 AM
To: Tomas Trevino
Subject: RE: San Xavier Community

Hello Mr. Trevino,

Thank you for this information. Additionally, could you clarify with our office if it is within practice for TXDOT to visit and do a walkthrough of the area where construction will be taking place, including adjacent neighborhoods?

Best,

Alejandra Villarreal| Constituent Caseworker
Office of Texas State Senator César J. Blanco -SD29
9440 Viscount Blvd. #205 El Paso, Texas 79925
O: (915) 595-5955| F: (915) 595-5944 ||**M**: (915) 213-4760
Alejandra.Villarreal@senate.texas.gov
*District Office Staff at times works remotely and can be reached via their mobile number listed.

communication in error, please notify us immediately at our telephone number set forth above and permanently delete this email and any attachments from your system.

From: Tomas Trevino
Sent: Tuesday, January 31, 2023 7:36 PM
To: Alejandra Villarreal
Subject: Re: San Xavier Community

Good evening Alejandra,

We have not received any new complaints from the residents at the San Javier neighborhood. In addition we completed many of the things we agreed to address from the residents that we had spoken too originally. Please let me know if I may be of any further assistance.

Thanks and Stay Safe

Tomas Trevino
El Paso District Engineer

From: Alejandra Villarreal
Sent: Tuesday, January 31, 2023 8:24:54 PM
To: Tomas Trevino
Subject: San Xavier Community

Hello Mr. Treviño,

I hope your day went well. I am reaching out because we have received some questions from the San Xavier Community. I know the last time we spoke TXDOT informed our office that no complaints had been submitted through the formal process by any of the community members. We are hoping to receive an update if this information has changed since July of 2022. Any information or assistance you may provide on this matter is greatly appreciated.

Please let me know if you have any questions. I look forward to hearing from you.

Best,

Alejandra Villarreal| Constituent Caseworker
Office of Texas State Senator César J. Blanco -SD29
9440 Viscount Blvd. #205 El Paso, Texas 79925
O: (915) 595-5955| F: (915) 595-5944 ||**M**: (915) 213-4760
Alejandra.Villarreal@senate.texas.gov
*District Office Staff at times works remotely and can be reached via their mobile number listed.

[EXTERNAL EMAIL] TxDOT Public Records Request :: R028058-062823

TxDOT Records Request Center <txdot@govqa.us>

Fri 8/4/2023 6:06 PM

To:Veronica Carbajal(ELP) <vcarbajal@trla.org>

--- Please respond above this line ---

RE: PUBLIC RECORDS REQUEST of June 28, 2023, Reference # R028058-062823.

RE: PUBLIC RECORDS REQUEST of June 28, 2023, Reference # R028058-062823.

Good afternoon Ms. Carbajal,

TxDOT received a public information request from you on June 28, 2023. Your request mentioned:

"We are requesting the following documents related only to TXDOT's I-10 Connect Project (I-10 Connect) in El Paso, Texas.
TRLA is a 501c3 that provides free legal services to low-income Texans, in this case, residents of the San Xavier community. On behalf of our clients, we request a waiver of all fees and charges and/or a discount pursuant to TPIA § 552.267 and 43 TAC § 3.13 (b).
1. Names of contractors and point of contact.
2. Name of designer (s).
3. Drainage analysis that demonstrates the flow of rainwater before and after I-10 Connect was completed.
4. Geotechnical, site geology, and potholing evaluations.
5. Pre-assessment of the residential structures within a .5 mile of any of the construction.
6. Traffic studies/modeling related to the flow of traffic from East Paisano Drive to East San Antonio Street and back to East Paisano Drive.
7. Traffic studies/modeling related to the traffic expected to use I-10 Connect South, heading into Mexico once it was completed.
8. TXDOT's contracts for the I-10 Connect Project from 2016 to the present day.
9. Construction drawings.
10. Specification book.
11. Scope of work.
12. Field change orders.
13. Plans for the project at 30%.
14. Plans for the project at 90%.
15. Progress reports.
16. Notes from weekly meetings with the contractor.
17. A list of the heavy equipment that was used, identified by make and model.
18. Guidelines and/or limitations and/or precautions given by TXDOT to the contractor related to the use of heavy equipment within 30-50 feet of residential structures.

19. Vibration readings and measurements taken during the construction.
20. Noise readings taken during the construction.
21. Photographs of the construction.
22. Analysis and/or complaints of the cut through rate and deposits of debris at East San Antonio Street.
23. Complaints by other government entities, including the City of El Paso, El Paso Water Utility, and Texas Gas, EPISD.
24. Reports of damage to City of El Paso owned infrastructure, including but not limited to streets, sidewalks, water lines, sewage lines, and gas lines.
Thank you,
Verónica Carbajal
Attorney
Group Coordinator: Community Preservation & Empowerment
Texas RioGrande Legal Aid, Inc.
1331 Texas Ave.
El Paso, TX 79901
Direct Tel.: (915) 585-5107"

We are in receipt of your final payment of $531.00.

TxDOT has reviewed its files and has located responsive records to your request. Regarding items #5, 17, 18, 19, 20, 22 and 24, we do not have documents in response.

Please log in to TxDOT Records Request Center to retrieve the appropriate responsive documents.

Public Records Request - R028058-062823

If you have any questions, please contact me at (915) 790-4207.

If you need any additional information, please submit a new request.

Your request is now closed.

Thank you,

Susan Ryde
Open Records Coordinator
El Paso District

To monitor the progress or update this request please log into the TxDOT Records Request Center

EXHIBIT B

Journal of Exposure Science and Environmental Epidemiology (2013) 23, 289–298

www.nature.com/jes

ORIGINAL ARTICLE

Ultrafine particle levels at an international port of entry between the US and Mexico: Exposure implications for users, workers, and neighbors

Hector A. Olvera[1], Mario Lopez[2], Veronica Guerrero[3], Humberto Garcia[4] and Wen-Whai Li[5]

Exposure to diesel-emitted particles has been linked to increased cancer risk and cardiopulmonary diseases. Because of their size (<100 nm), exposure to ultrafine particles (UFPs) emitted from heavy-duty diesel vehicles (HDDV) might result in greater health risks than those associated with larger particles. Seasonal UFP levels at the International Bridge of the Americas, which connects the US and Mexico and has high HDDV traffic demands, were characterized. Hourly average UFP concentrations ranged between 1.7×10^3/cc and 2.9×10^5/cc with a mean of 3.5×10^4/cc. Wind speeds $<2\ m\ s^{-1}$ and temperatures $<15\ ^{\circ}C$ were associated with particle number concentrations above normal conditions. The presence of HDDV had the strongest impact on local UFP levels. Varying particle size distributions were associated with south- and northbound HDDV traffic. Peak exposure occurred on weekday afternoons. Although in winter, high exposure episodes were also observed in the morning. Particle number concentrations were estimated to reach background levels at 400 m away from traffic. The populations exposed to UFP above background levels include law enforcement officers, street vendors, private commuters, and commercial vehicle drivers as well as neighbors on both sides of the border, including a church and several schools.

Journal of Exposure Science and Environmental Epidemiology (2013) **23,** 289–298; doi:10.1038/jes.2012.119; published online 16 January 2013

Keywords: US–Mexico border crossing; nanoparticles; heavy duty; diesel; gasoline; principal component analysis

INTRODUCTION

Exposure to diesel-emitted particles has been linked to pulmonary inflammation, increased susceptibility to respiratory infections, chronic obstructive pulmonary diseases, exacerbation of asthma, and increased risk of cancer.[1–11] In this regard, the US Environmental Protection Agency has diesel-emitted particles listed as a likely carcinogen, while the World Health Organization considers diesel-engine exhaust carcinogenic.[12–14] Although, diesel-emitted particles denote particles of all sizes, there is reason to believe that exposure to ultrafine particles (UFPs) emitted from heavy-duty diesel vehicles (HDDV) might result in higher health risks than those associated with coarser particles.[15–17] Because of their small size (<100 nm), UFP can evade human defense mechanisms, penetrate deep into the body, reach the bloodstream, and be distributed to potentially sensitive sites, such as bone marrow, lymph nodes, spleen, and heart.[18–22] Particularly, UFP have been shown to impact the cardiovascular, pulmonary, and central nervous systems, even more so in compromised individuals.[15,23–25]

Accurate characterizations of exposure conditions at both occupational and urban environments are necessary for the advancement of UFP health risk assessments. Particularly critical is the identification of settings of exposure of large populations to extreme UFP levels. Such scenarios are plausible in close proximity to dense traffic conditions. Especially near dense HDDV traffic as UFP emissions from these vehicles have been observed to be considerably greater than from light-duty gasoline vehicles.[26] The International Bridge of the Americas (BOTA), as one of the busiest ports of entry between US and Mexico, has an elevated traffic demand and stringent security inspections, which result in long queues of idling vehicles on both sides of the border. A peculiarity of the BOTA, as compared with other ports of entry on the US/Mexico border, is that it has the largest combined traffic demand of privately owned (mostly light-duty gasoline) and commercially operated (mostly HDDV) vehicles.[27] The combined traffic conditions at the BOTA are expected to induce UFP exposure on large numbers of private commuters and law enforcement officers. Furthermore, exposure to combined gasoline and diesel-engine emissions might produce amplified impacts to the cardiovascular system as compared with gasoline or diesel only exposures.[28–30]

In this study, UFP number concentrations at the BOTA were characterized. Specifically, the temporal variations of particle number concentrations (PNCs) and their associations with traffic and meteorological conditions were assessed, and exposure scenarios and populations at risk identified. Also, the specific size fractions associated with HDDV traffic were determined. The measurements for this study were performed as part of a comprehensive air quality characterization at the BOTA.[31]

MATERIALS AND METHODS

Study Site

The BOTA is located near the geographic center of the border separating the El Paso, Texas, USA and Ciudad Juarez, Chihuahua, Mexico urban

[1]Hispanic Health Disparities Research Center, Center for Environmental Resource Management, University of Texas at El Paso, El Paso, TX, USA; [2]Civil Engineering Department, University of Texas at El Paso, El Paso, TX, USA; [3]University of Texas at El Paso, Civil Engineering Department, El Paso, TX, USA; [4]Instituto Tecnologico de Estudios Superiores de Monterrey, Ciudad Juarez, Mexico and [5]University of Texas at El Paso, Civil Engineering Department, El Paso, TX, USA. Correspondence: Dr Hector A. Olvera, Hispanic Health Disparities Research Center, Center for Environmental Resource Management, University of Texas at El Paso, 500 University Avenue, El Paso, TX 79968, USA. Tel: +1 915 747 6518; Fax: +1 915 747 5145.
E-mail: holvera@utep.edu
Received 3 July 2012; accepted 30 October 2012; published online 16 January 2013

region (Figure 1a). Customs and immigration inspection areas as well as administrative offices are located at both the US and Mexican sides of the BOTA (Figure 1b). Five additional ports of entry operate within the urban region. The BOTA traffic demands of both commercial and private vehicles account for >50% of the regional total.[27] It has been reported that 89% of the northbound commercial vehicle fleet at the bridge is composed of HDDV, whereas private traffic is mostly composed of light-duty gasoline-fueled vehicles.[32] Considering that traffic is mostly composed of local commuters and drayage trucks, similar traffic fleet characteristics are expected for both north- and southbound traffic. The bridge is permanently open to private vehicle and pedestrian traffic. Northbound commercial traffic services are limited to 0600 hours to 1800 hours from Monday to Friday and from 0600 hours to 1400 hours on Saturdays. Southbound commercial lanes are open from 0800 hours to 2100 hours on weekdays and Saturdays. The bridge is closed for commercial traffic on Sundays.

Study Period

Four measurement campaigns were conducted between December 2008 and September 2009. Each campaign lasted 2 weeks. The seasonal 2-week monitoring scheme has been shown to produce good estimates of annual averages for urban air pollutants.[33–35] The monitoring dates and corresponding meteorological variables are listed in Table 1.

Measurement Equipment

The monitoring site was located within a storm pumping station operated by the El Paso Water Utilities, at approximately 30 m from the traffic centerline and 80 m from the US customs inspection station (Figure 1b). Particle size distributions and number concentrations were measured with a Scanning Mobility Particle Sizer (SMPS) Model 3936-L75 (TSI, Shoreham, MN, USA) and an Aerodynamic Particle Sizer (APS) Model 3321 (TSI, Shoreham, MN, USA). The SMPS produced size distributions composed of 102 size bins for particle diameters between 6 nm and 225 nm. The APS produced size distributions composed of 52 size bins for particle diameters between 500 nm and 20 μm. The SMPS scan time was 120 s with a retrace of 30 s performed at 10-min intervals. The APS produced real-time measurements for 2 min at 10-min intervals. The instruments operated continuously during the measurement campaigns and were stopped periodically for quick maintenance (e.g., nozzle and impactor cleaning). Meteorological information recorded at a monitoring station (CAMS 41) located approximately 400 m (~1/4 mile) from the BOTA was obtained from the Texas Commission on Environmental Quality website. Wind speed and direction were also measured on site with a portable AutoMet Model 466A (MetOne Instruments, Grants Pass, OR, USA). Yearly northbound traffic data were obtained from the University of Texas at El Paso Border Modeling Database. Daytime hourly crossing rates for both north- and southbound traffic were determined via manual counts from video recordings performed during 4 days per monitoring campaign. Nighttime crossing rates were not determined. Reduced video quality during the nighttime hours impeded identification of crossing vehicles. Furthermore, traffic queues were short during nighttime hours and were outside the recording angle. Video recordings did not include the area near inspection stations for security purposes.

Data Analysis

PNCs are reported in number of particles per cubic centimeter (No./cc). PNCs were processed as both 10-minute and 1-h averages. Some analyses were performed exclusively for downwind or upwind conditions relative to traffic. Traffic queues near the monitoring site are approximately parallel to the north–south orientation as shown in Figure 2b, allowing downwind conditions to be defined by an east wind direction ($90^\circ \pm 45^\circ$) and upwind conditions by a west wind direction ($270^\circ \pm 45^\circ$). The Pearson correlation coefficient was used to evaluate associations between variables. Time-dependent graphs were used to study pollutant peaks and diurnal trends. Principal component analysis was used to synthetize the 154-bin size-resolved particle data set into a reduced set of variables (principal components (PCs)) that capture independent variation between particle size ranges.[36] The PCs were subsequently used to study the associations between specific particle size distributions, traffic, and meteorological variables. The analysis was done on the *varimax* rotated matrix.

Quality Assurance

The SMPS and the APS were calibrated by the manufacturer previous to the start of the study. Sampling flows and equipment performance parameters (e.g., voltage and laser intensity) were checked on a daily basis. The SMPS inlet impactor and the APS inlet nozzles were cleaned on a daily basis. Data was corrected for diffusion losses inside the SMPS by the instrument software.[37]

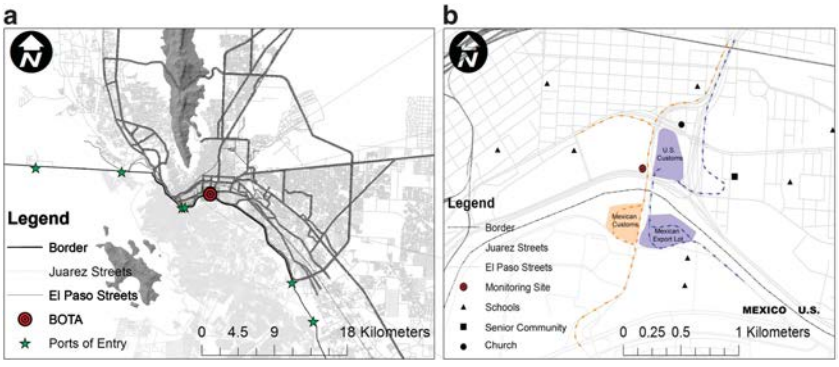


Figure 1. Study site; (**a**) El Paso regional map with shaded areas representing mountains, (**b**) study site at the International Bridge of the Americas, with arrows indicating commercial traffic routes and shaded areas indicating inspection areas.

Table 1. Monitoring periods and corresponding meteorological summary.

Campaign	*Start date*	*End date*	*Wind speed*[a]	*Wind direction*[b]				*Temperature*[a]	*Relative humidity*[a]
			(m s^{-1})	*North*	*East*	*South*	*West*	*(°C)*	*(%)*
Winter	5-Dec-08	19-Dec-08	1.5 (1.4)	16.9	23.7	46.8	12.6	10.3 (5.0)	26.2 (6.5)
Spring	6-Mar-09	21-Mar-09	2.1 (1.1)	11.9	32.2	10.7	45.2	16.7 (6.1)	25.5 (10.6)
Summer	26-May-09	11-Jun-09	2.4 (1.1)	10.4	15.5	6.7	67.4	26.7 (4.3)	33.2 (9.5)
Fall	29-Aug-09	14-Sep-09	2.2 (1.1)	22.8	43.8	13.9	19.5	25.4 (4.5)	40.7 (16.7)

[a]Average for period (SD).
[b]Percentage of seasonal measurements.

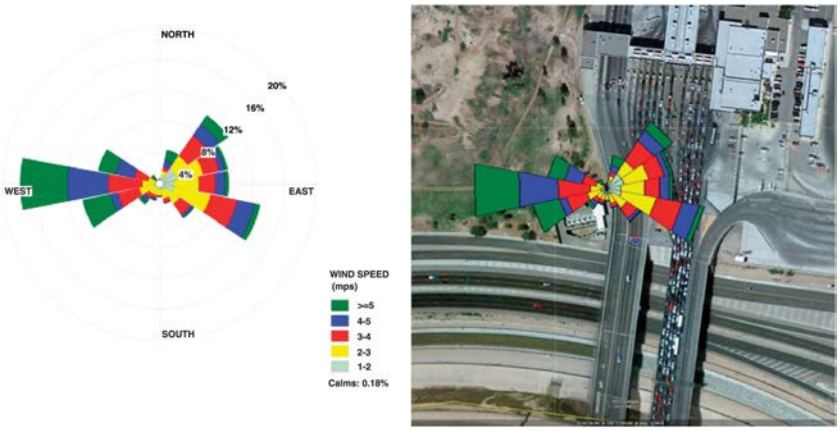


Figure 2. Wind distribution during the study; (left) wind rose, (right) wind rose over study site.

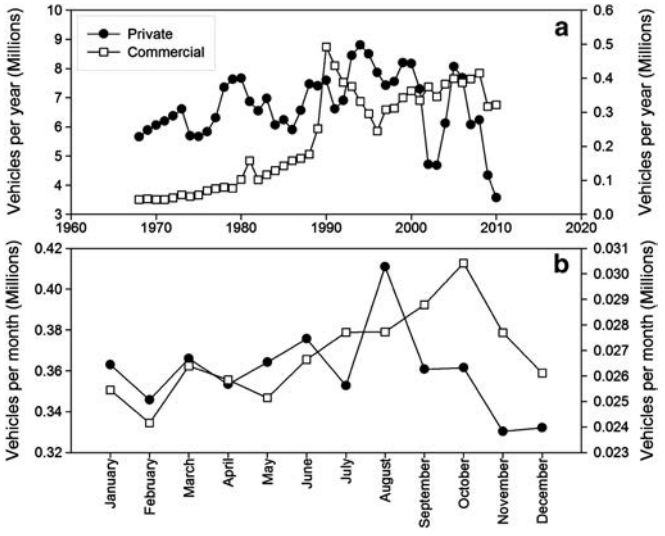


Figure 3. Northbound traffic; (**a**) yearly crossing rates, (**b**) monthly crossing rates. Private traffic is plotted on right axis and commercial traffic on left axis.

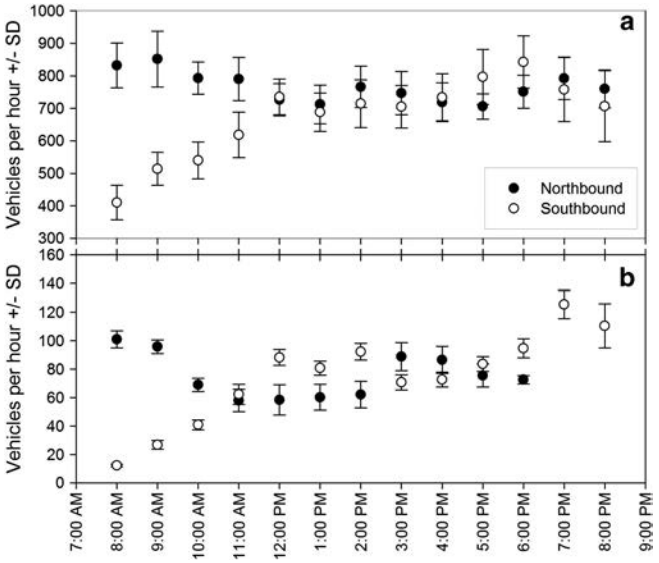


Figure 4. Hourly vehicle crossing rates; (**a**) private traffic, (**b**) commercial traffic.

RESULTS AND DISCUSSION

Traffic Characteristics

In 2009, the total northbound crossings at the BOTA were 4.7 million vehicles, of which 7.3% were commercial vehicles (Figure 3a). Ten years before, in 1999, the total northbound crossings were 8.5 million vehicles, of which 4.2% were commercial vehicles. The decrease of private vehicle crossings during the 10-year period was 45%, compared with a 4% decrease of commercial vehicles. Private traffic crossing rates decreased after 2001, coinciding with the implementation of stringent security measures by US law enforcement agencies. Private crossings increased after 2003 but decreased considerably again after 2008. Commercial traffic increased gradually from the mid 1990s until a noticeable decrease also in 2008. The 2008 total traffic decrease coincides with the start of a national economic recession, which impacted the region's industry and commercial activity. Figure 3b shows the monthly northbound crossing rates for 2009. During that year, private traffic crossing rates were highest in August and lowest in November. Commercial traffic was lowest in February, increased gradually from June to October, and decreased afterwards. The percentage of total crossings represented by commercial vehicles was lowest in August (6.6%) and highest in October (8.3%). Future traffic trends at the BOTA cannot be determined from these results. Still, based on the substantial industrial activity of the region, elevated commercial traffic demands can be reasonably expected at the BOTA in the upcoming years.

Daytime hourly crossing rates by vehicle type and traffic direction are presented in Figure 4. Northbound private traffic was highest in the morning at around 0900 hours and remained above 700 vehicles per hour during the day. Southbound private traffic crossing rates increased from 0800 hours to 1200 hours and varied minimally until peaking at 1800 hours. South- and northbound private vehicle crossing rates were comparable between 1200 hours and 1600 hours. However, due to stringent inspections by US customs, northbound private traffic queues were constantly present, whereas southbound traffic moved rapidly and queue formation was intermittently observed. During daytime hours, routine inspections of southbound traffic by US law enforcement officials were observed to induced traffic queues towards the north of the study site. Private traffic weekend patterns were similar to those observed during weekdays, with the exception that on weekends northbound private traffic peaked in the afternoon at later hours than on weekdays.

Commercial northbound traffic crossing rates peaked at 0800 hours and again at 1500 hours. Southbound commercial traffic crossing rates increased from 0800 hours to 1200 hours and peaked in the afternoon at 1900 hours. During weekdays, long southbound queues were common between 1700 hours and 1900 hours.

UFP Levels

Total PNC represents the measured size range between 6 nm and 20 μm. The UFP range ($<$100 nm) represented 93.9% (SD 5.4) of the total particle concentrations. The hourly average PNC at the BOTA ranged between 1.7×10^3/cc and 2.9×10^5/cc with a mean of 3.5×10^4/cc (SD 3.5×10^4). Seasonal and daily PNC variations are presented in Figure 5. Seasonally, particle concentrations were highest in winter and lowest in summer independent of wind direction (Figure 5a). Stable atmospheric conditions, common in winter, have been shown to inhibit dilution and affect the particle concentration gradients away from traffic.[38] During the week, PNC peaked on Wednesdays, with comparable levels observed on Thursdays and Fridays. The lowest concentrations were observed on Sundays (Figure 5b). Bearing in mind that PNCs are strongly influenced by nearby sources,[39] and that commercial traffic was absent on Sundays when lowest concentrations were observed, PNC appears to be strongly associated with commercial traffic.

Hourly PNC variations by season are shown in Figure 6. Overall, during weekdays, the average PNC increased rapidly in the morning between 1700 hours and 1900 hours (Figure 6). During the day, the overall averaged PNC varied minimally and peaked above 5×10^4/cc at 1800 hours. During winter, the hourly PNC variation had clear morning (0800 hours) and evening (1800 hours) peaks above 7×10^4/cc. During spring, the morning and evening peaks were also observed but at lower concentrations. The hourly variations during the fall were comparable with the overall average. The summer PNC was consistently lower than the overall average.

The local background PNC was estimated as the average number concentration between 0200 hours and 0300 hours under upwind conditions. Local background estimates were considered a good approximation of actual values considering that: (a) between 0200 hours and 0300 hours traffic was minimal or absent, (b) the BOTA is mostly surrounded by parks, (c) the nearest major highway is more than a 1.3 km away, and (d) contributions from other sources are unlikely as UFP levels decay sharply away from sources.[40] During the study, the estimated local background levels averaged 1.0×10^4/cc. Background levels varied minimally by season ranging between 1.3×10^4/cc and 0.9×10^4/cc, with the highest level observed in winter and lowest in fall (Figure 6). Figure 7 shows the hourly variations of PNC categorized by meteorological parameters. The impact of meteorology on PNC levels between 0200 hours and 0300 hours was minimal (Figure 7). Wind direction had the smallest effect on nighttime PNC, confirming the absence of a meaningful source at that time (Figure 7b).

Wind Effects

During this study, downwind and upwind conditions represented 31.8% and 33.4% of the measurements, respectively (Figure 2). Calm conditions were observed during 0.18% of the measurements. High wind speeds were predominately associated with upwind conditions. Both wind speed and wind direction impacted PNC (Figure 7). As shown on Figure 2b, most particle measurements under downwind conditions ($90^\circ \pm 45^\circ$) would be associated with emissions from vehicles in the north end of the BOTA, rather than those in the queue towards the south. Considering the low frequency of winds from the south and the minimal percentage of calm conditions (0.18%), the impact of queue length on the measurements was considered minimal. Wind speeds $<$2 m/s were associated with PNC above the average (Figure 7a). Expectedly, PNC were lowest under upwind conditions (west) and highest under downwind conditions (east) as shown in Figure 7b. To isolate the effects of wind speed from the effects of traffic, PNC averages were calculated for categorized wind direction and time period as shown in Figure 8. The daytime period was selected based on the presence of traffic (0600 hours–0900 hours) while the nighttime period included the complementary hours. Independent of wind direction and the presence of traffic, PNC decreased as wind speed increased (Figure 8). Between 2005 and 2009, the wind speed measured near the BOTA at CAMS 41 was $<$2 m/s during 36% of the time.

Temperature Effects

Previous studies have shown that ambient temperature affects particle concentrations.[41,42] During the study, ambient temperature varied between $-1\,^\circ$C (30 F) and 35 $^\circ$C (95.5 F). Temperature impacted PNC considerably as shown in Figure 7c.

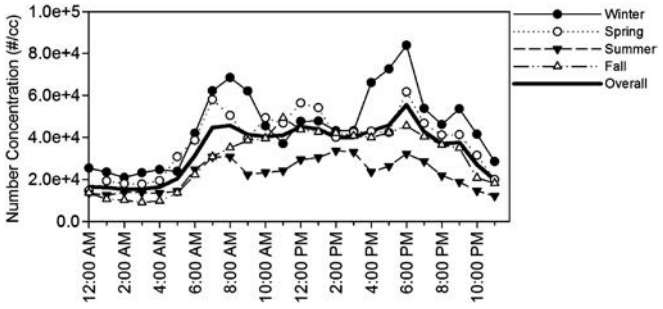


Figure 6. Hourly variation of particle number concentration by season.

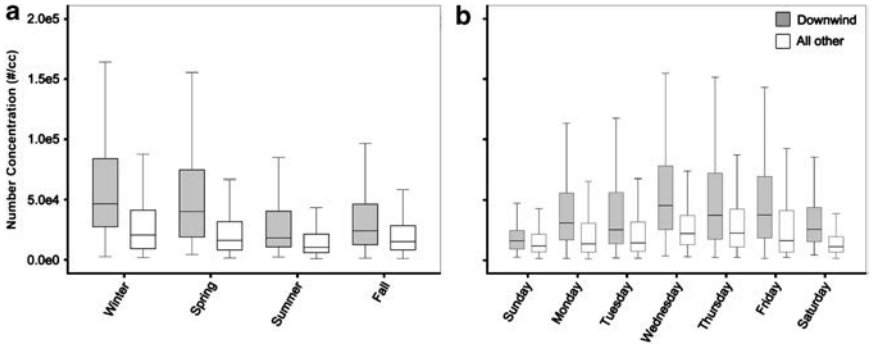


Figure 5. Temporal variation of particle number concentrations; (**a**) by season, (**b**) by day.

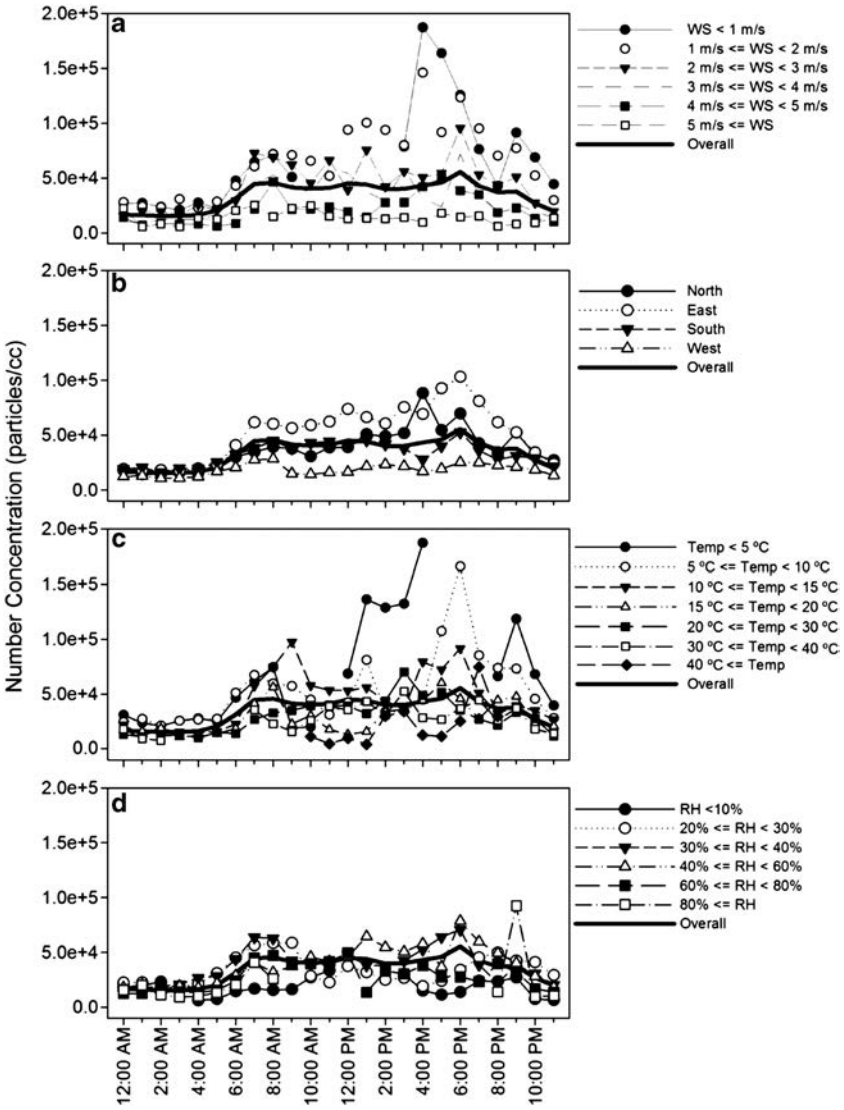


Figure 7. Impact of meteorological parameters on hourly particle number concentrations; (**a**) wind speed, (**b**) wind direction, (**c**) temperature, and (**d**) relative humidity.

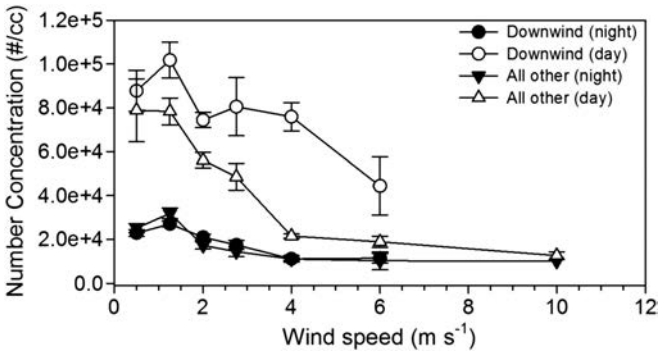


Figure 8. Wind effect on particle number concentrations.

Temperatures $<15\,^{\circ}C$ ($\sim 60\,F$) were usually associated with PNC above the average. The impact of temperature on PNC was comparable with that of wind speed, whereas relative humidity had a reduced impact on PNC (Figure 7d). Figure 9a shows the temperature variation by hour and season. The consistent diurnal temperature pattern across seasons facilitated the standardization of PNC by time segment and the isolation of the temperature effect on PNC (Figure 9b). The standardization consisted of subtracting the averaged PNC, for a specific time segment, from each PNC value and dividing over the corresponding SD. Hourly standardized PNC averages were categorized by temperature range as shown in Figure 9b. Again, a PNC above the mean was associated with temperatures $<15\,^{\circ}C$. Particle concentrations increase sharply as temperature decreases $<15\,^{\circ}C$ but vary slightly at higher temperatures. It has been suggested that lower exhaust temperatures favor new particle formation particularly in the nuclei mode (<40 nm).[42] Also low ambient temperatures have been observed to inhibit particle agglomeration and limit the decay of the particle plume.[42] Furthermore, stable atmospheric conditions common during colder periods dampen dilution and extend the concentration gradients away from traffic. The temperature effect explains the higher averaged PNC observed in winter (Figure 5a). Between 2005 and 2009, the temperature at CAMS 41 was $<15\,^{\circ}C$ during 42% of the time, but mostly during nighttime hours. During daytime hours, the temperature was $<15\,^{\circ}C$ during 15% of the time.

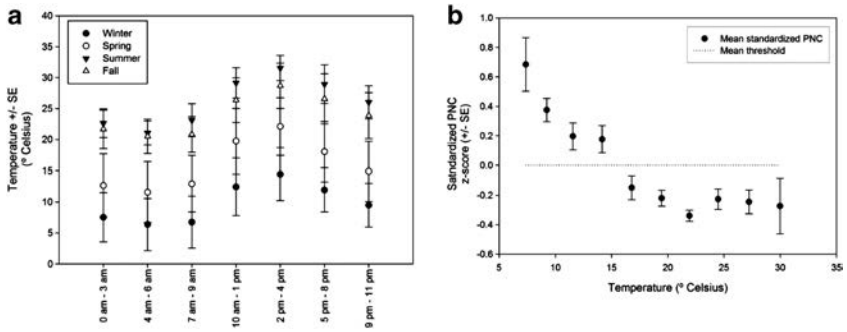


Figure 9. Temperature effect on particle number concentrations; (**a**) diurnal temperature profile, (**b**) standardized PNC summarized by temperature category.

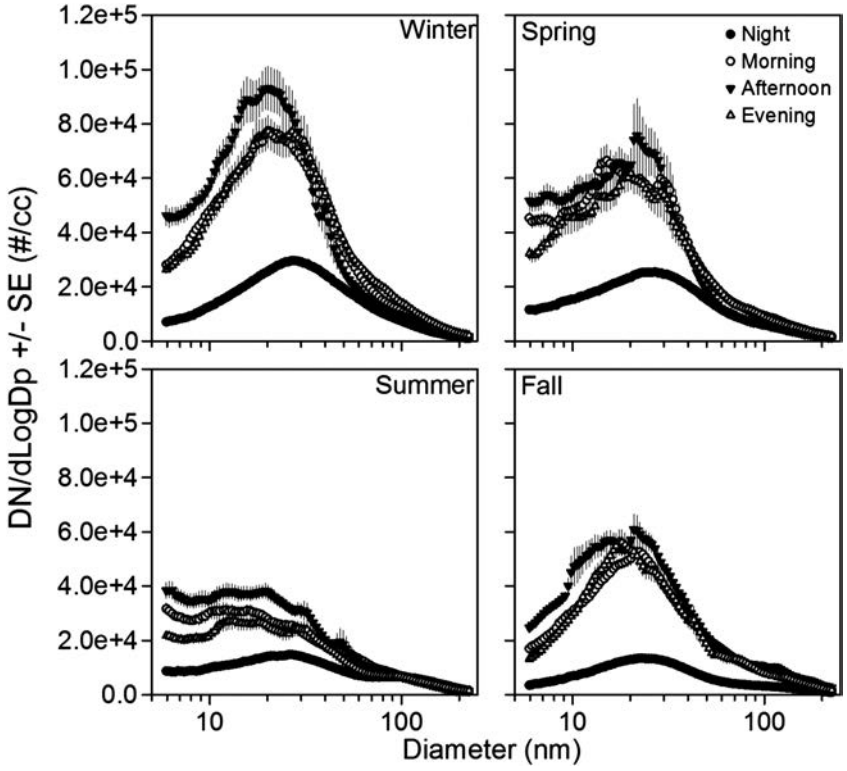


Figure 10. Average particle size distributions by season and diurnal time periods.

Particle Size Distributions

The average size distributions shown in Figure 10 were obtained by averaging PNCs by size bin for the respective time periods. The size distributions reflect the seasonal variation already observed in Figure 5a, with highest levels observed in winter and lowest in summer. Overall the size distributions had one distinct mode with geometric mean diameter ranging between 15 nm and 30 nm. Single-mode size distributions were consistent throughout the year. The size distribution during nighttime hours was comparable among seasons, suggesting a minimal impact of traffic at this time. Within each season, the size distribution change minimally throughout the day. Between seasons, the size distributions had some noticeable differences. The size distributions in the spring and summer show higher fractions of the smallest particles (<15 nm). Such increase was more pronounced in the summer. This could be attributed to vehicle fleet characteristics as the percentage of commercial vehicles varied by season as previously discussed (Figure 3b). Also a decreased rate of coagulation due to a smaller particle size difference could have influenced the higher fraction of the smallest particles.[43,44] Considering the average temperature and humidity values presented in Table 1, the seasonal size distribution variation shown in Figure 10 agrees with the impacts of humidity and temperature on size distributions assessed by Zhu et al.[45] in Los Angeles. However, because humidity is predominately lower in the semi-arid climate of El Paso, in this study temperature had a greater impact on particle size distributions, as compared with humidity in Los Angeles where the climate is sub-tropical.

Traffic Effects

The impact of diesel *versus* gasoline traffic was evaluated by studying the mean differences of PNCs between weekdays and Sundays. The comparisons were reasonable, because on Sundays commercial traffic was absent and private traffic patterns were similar to those observed on weekdays. The daily variation shown in Figure 5b illustrates the considerable drop of PNCs on Sundays as compared with weekdays. Averaged particle concentrations for

Table 2. Principal component analysis of the size-resolved particle number concentrations.

Component	*Initial Eigenvalues*			*Rotation sums of squared loadings*		
	Total	*% of variance*	*Cumulative %*	*Total*	*% of variance*	*Cumulative %*
1	65.9	72.8	42.8	34.6	22.4	22.4
2	32.9	21.3	64.2	33.0	21.4	43.9
3	15.3	10.0	74.1	27.7	18.0	61.9
4	8.3	5.4	79.5	27.1	17.6	79.5

weekdays and Sundays were 39,217/cc and 17,363/cc, respectively. For daytime hours (0600 hours–2100 hours), when commercial traffic is present during weekdays, averaged particle concentrations for weekdays and Sundays were 49,217/cc and 17,699/cc, respectively. The ratio of average PNC over local background levels for weekdays and Sundays were 4.8 and 1.7, respectively. Considering the independent increase of PNCs above local background levels (10,362/cc) induced by the presence of each type of traffic, the impact of commercial traffic is 4.3 times greater than that of private traffic. Exposure to UFP at the BOTA is considerably higher when commercial traffic is present.

By means of principal component analysis, the data set composed of 154 size bins was reduced to four PCs that explained 79.5% of the variability (Table 2). The factor loads and the reconstructed particle size distributions are shown in Figure 11. The factor loads represent the correlation between each variable (size bin) and the corresponding component. The size distributions associated with each PC were reconstructed by multiplying factor loads >0.6 by the SD of the PNC of the corresponding size bin.[46] The PCs are ordered by percentage of explained variation according to statistical convention (see Table 2). Based on the reconstructed size distributions, the four components approximate nucleation (PC2; from 6 nm to 30 nm), ultrafine (PC4; from 15 nm to 100 nm), accumulation (PC3; from 50 nm to 450 nm), and fine (PC1; from 800 nm to 20 μm) particle size ranges (Figure 11b). The gaps between the four size distributions in Figure 11b represent the particle sizes that did not correlate strongly (load <0.6) with any component or were due to a measurement gap between 225 nm and 500 nm associated with the instrument's detection limits. To determine the temporal variation of the components, factor scores were estimated using a linear regression approach.[47] PC2 and PC4 cover the size range of the size distributions shown in Figure 10. By definition PCs are independent of each other. The principal component analysis captured the independent temporal variation of the particle size ranges represented by each component. Therefore, the independence of PC2 and PC4 suggests that UFPs might have been affected by two or more distinctive sources and/or physical phenomena during the study. Identifying the source of this distinctive variation is relevant if exposure reduction is to be undertaken via emission reduction strategies.

To further investigate the associations of the PCs against traffic, each component was characterized by averaging all measured values of a specific variable (e.g., traffic, number concentration) for which the factor score was above its 90th percentile and then normalizing by the overall average of that variable (see Table 3).[46] Within each column, the variable with the highest value was considered to have the best association with the corresponding component.[46] Southbound private traffic showed a slight association with both PC2 and PC4 components. Note that the lack of association of northbound private traffic with the PCs indicates that vehicle-crossing rates were not a proper surrogate of private vehicle emissions rather than the lack of an actual physical association. Northbound private vehicle crossings had minimal variation during daytime hours when heavy traffic was constantly present at the BOTA. Total commercial traffic

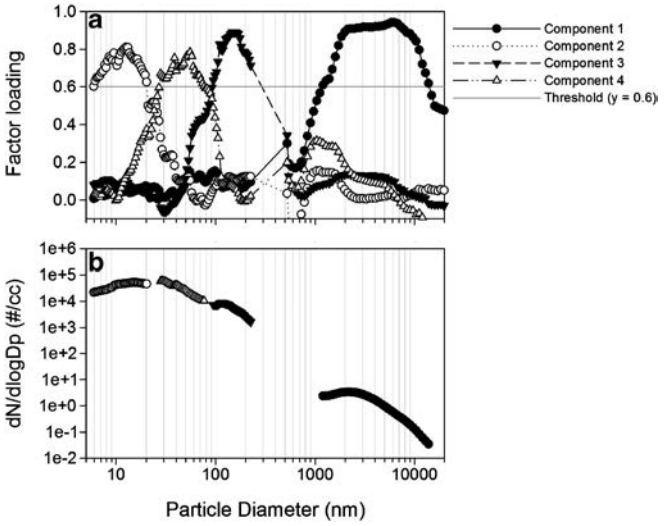


Figure 11. Size distributions of principal components; (**a**) factor loads, (**b**) reconstructed size distributions.

associated with all for components but more strongly with PC2, which represents particles in the nuclei size range. The association of northbound commercial traffic with PC2 was also strong, whereas southbound commercial traffic associated strongly with PC4. Overall, the results indicate that PNCs at the BOTA are strongly associated with the presence of commercial traffic. However, it appears that emissions from northbound commercial traffic specifically have a strong and distinctive impact on number concentrations of the smallest particles. Distinctive UFP emission characteristics between commercial traffic might be associated with the vehicle load. Northbound commercial vehicles haul loaded trailers while southbound vehicles bring back a greater number of empty trailers.[32]

Table 4 shows reported PNCs near dense traffic conditions in other US cities. Average particle concentrations at the BOTA were lower than those observed near two major highways in Los Angeles, CA.[40,48] The distances between the monitoring sites and traffic were comparable between most studies ($\sim$30 m). Traffic flows at the BOTA were at least eight times less than the 12,000 vehicles per hour observed in Los Angeles.[40,48] However, PNCs at the BOTA were 4–5 times less than those observed in Los Angeles. Note that the water-based particle counters without a sheath flow design, as those used in Los Angeles, have been shown to underestimate vehicle-emitted PNCs, particularly for particles <20 nm.[49] In Los Angeles, higher relative humidity was associated with higher PNCs.[45] Also, traffic speeds were considerably distinct between studies. A drop in UFP concentrations with traffic slowdown conditions, indicating that fewer UFPs are emitted under such conditions, have been previously reported.[40] Specifically, higher particle number emission rates from diesel engines under cruise driving cycles as compared with idling conditions have been measured.[50] The driving cycles at the BOTA are mostly under idling and creep idling (<5 mph) conditions.[32]

Table 3. Associations of principal components with traffic and particle concentrations.

	Private traffic			*Commercial traffic*			
	Total	*Northbound*	*Southbound*	*Total*	*Northbound*	*Southbound*	*TNC*
PC1	0.92 ± 0.05	1.00 ± 0.064	0.81 ± 0.101	1.20 ± 0.207	1.08 ± 0.236	1.03 ± 0.127	1.19 ± 0.20
PC2	1.05 ± 0.04	0.99 ± 0.042	1.13 ± 0.081	1.46 ± 0.163	1.38 ± 0.183	1.13 ± 0.122	3.03 ± 0.23
PC3	1.04 ± 0.06	1.03 ± 0.078	1.06 ± 0.085	1.21 ± 0.153	0.95 ± 0.177	0.96 ± 0.135	1.89 ± 0.25
PC4	1.08 ± 0.05	1.03 ± 0.063	1.13 ± 0.092	1.34 ± 0.205	1.11 ± 0.238	1.32 ± 0.194	2.67 ± 0.20

Table 4. Reported ultrafine particle concentrations near traffic.

Location	*Site description*	*TNC (#/cc)*	*Size range*	*Distance*	*Source*
El Paso, TX	BOTA	3.50E + 04	6 nm–20 μm	30 m	This study
Los Angeles, CA	Interstate highway	1.5E + 05	6–220 nm	30 m	Zhu et al., 2002[40]
El Paso, TX	BOTA	1.40E + 04	20–100 nm	1000 m	Noble et al., 2003[55]
Cincinnati, OH	Interstate highway	3.20E + 04	20–1000 nm	80 m	Reponen et al., 2003[56]
Los Angeles, CA	Interstate highway	1.6E + 05	6–220 nm	30 m	Zhu et al., 2002[48]
Austin, TX	Interstate highway	1.20E + 05	6–300 nm	30 m	Zhu et al., 2007[51]
Beeville, TX	Inside moving vehicle	3.40E + 04	7.6–289 nm	On vehicle	Zhang et al., 2010[57]

Furthermore, at the BOTA the commercial vehicle fleet is mostly composed of older models used exclusively for drayage transport between Juarez and El Paso.[32] Differences between PNCs and traffic flows measured at the BOTA and the highways in Los Angeles might be associated with distinctive traffic flows, driving conditions, fleet characteristics, and ambient conditions between studies.

Local Impact

The customs and immigration workforce might be at highest risk as their occupational exposure extends through their work shifts, which have been reported to commonly exceed 12 h. The UFP concentrations observed at the monitoring site are a conservative estimate of the exposure levels expected at the inspection areas, which are closer to traffic. Higher exposure is expected at the commercial traffic inspection areas on both sides of the border. Private vehicle crossing times commonly extend beyond an hour. Commuters driving with open windows would be exposed to in-cabin levels at least as high as those observed at the monitoring site. Lower in-cabin exposures would be expected for those commuters driving with close windows. The filtering efficiency for UFPs of vehicle air conditioning fans has been observed to be approximately 50% and increased to 85% when operated in recirculation mode.[51] Because north- and southbound sidewalks are closest (<10 m) to commercial traffic lanes and particle concentrations increase exponentially near traffic,[40] pedestrian commuters might be exposed to particle levels considerably greater than those observed during this study. In 2009, northbound pedestrian crossings were above 2500 per day. Furthermore, street vendors might be exposed to the highest levels as they usually move in between vehicles in close proximity to vehicle exhaust systems.

Peak 10-minute exposures at the BOTA were observed above 7.0×10^5/cc, which are comparable to the peak exposures above 5.0×10^5/cc reported in settings where soldering, welding, and plasma-spraying processes occurred.[52–54] The health impact of severe acute exposure to UFP levels remains undetermined. Still peak UFP exposures near dense urban traffic at the BOTA are comparable with the severest occupational exposures.

Neighborhood Impact

Ambient UFP levels measured in 1999 at CAMS 41, which is located approximately 400 m away from the BOTA, were of 14,600/cc.[55] Supplemental, daytime measurements were performed from August 14 through August 16, 2012 at CAMS 41. The hourly PNC averages ranged between 0.7×10^4/cc and 1.7×10^4/cc, and averaged 1.2×10^4/cc. The averaged PNC under upwind conditions, which constituted 67% of the measurements, was 1.1×10^4/cc. The daytime UFP concentrations are in the same range as that of the estimated local background levels and are comparable with the values measured at this site in 1999. Considering that traffic was and still is the major source of UFP near the BOTA, that PNC subside rapidly in short distances from dense traffic,[40] and that background concentrations are not expected to vary drastically over time, the concentrations observed at CAMS 41 in 1999 are considered to be close to the local background. In this regard, UFP exposures above background levels can be realistically expected within distances of 400 m from the traffic centerline. Figure 12 shows the region near the BOTA, where particle number concentrations above background levels are expected. On the US side, a public park (<50 m), an elementary school (<50 m), a church (<50 m), and a

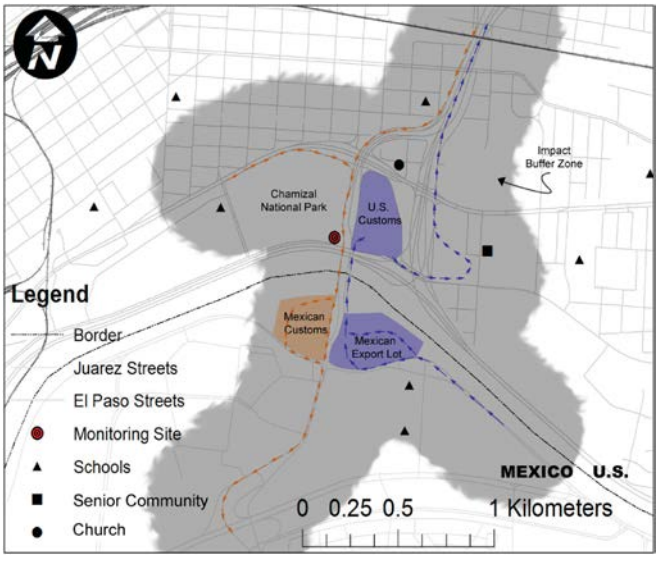


Figure 12. Areas of expected ultrafine particle exposure above background levels.

high school (<300 m) are all within the 400 m buffer zone of the BOTA traffic queues. On the Mexican side, a public park (<50 m), a sports recreation facility (<50 m), a high school (<100 m), and a university campus (<300 m) are also within the buffer zone. The UFP exposure of the populations at the above-mentioned locations might be considerably above background levels.

CONCLUSION

The hourly average UFP number concentrations at the BOTA ranged between 1.7×10^3/cc and 2.9×10^5/cc with a mean of 3.5×10^4/cc. During the study, the estimated background levels were 1.0×10^3/cc. Meteorological conditions had a significant impact on particle concentrations. PNCs increased during colder weather periods and decreased as wind speed increased. More specifically, PNCs increased for temperatures <15 °C and wind speeds <2 m/s. Between 2005 and 2009, daytime temperature near the BOTA was <15 °C during 15% of the time, while wind speed was <2 m/s during 36% of the time. Commercial traffic, which is mostly composed of HDDV, strongly influenced UFP concentrations in the vicinity of the BOTA. On Sundays when commercial traffic was absent, the UFP number concentrations were the lowest. Northbound commercial traffic had a strong and distinctive impact on number concentrations for particles in the nucleation size range. Southbound commercial traffic was also associated with UFP concentrations but with a size distribution dominated by larger particles. At the BOTA, traffic flows were at least eight times less than those observed near highways in Los Angeles. Yet, PNCs at the BOTA were only 4–5 times less than those observed in Los Angeles. Exposures to UFPs near dense idling traffic conditions, such as those at the BOTA, and in semi-arid conditions such as those in El Paso are different than those near highways in Los Angeles. Published UFP concentration gradients near highways and under dense traffic conditions are useful as part of exposure assessment protocols. However, exposure assessments to UFPs near dense traffic should take into consideration differences in: (a) total traffic flows, (b) fractions of heavy-duty diesel truck, (c) average vehicle speed, (d) fleet characteristics, and (e) ambient meteorological conditions.

The populations in close proximity of the BOTA-induced traffic buffer zone (including immigration, customs and law enforcement officers, street vendors, private commuters, and commercial vehicle drivers) are exposed to UFPs considerably above the background level. In addition, neighbors at a local church and several schools on both sides of the border are susceptible to UFP exposures well above the background level.

CONFLICT OF INTEREST

The authors declare no conflict of interest.

ACKNOWLEDGEMENTS

This project was supported by Award Number A-08-4 from the Southwest Consortium For Environmental Research and Policy, by Award Number 3P20MD002287-05S1 from the National Institute on Minority Health and Health Disparities and the Environmental Protection Agency, and by Award Number S11 ES013339 from the National Institute of Environmental Health Sciences (NIEHS). The content is solely the responsibility of the authors and does not necessarily represent the official views of the Hispanic Health Disparities Research Center, the National Institute on Minority Health and Health Disparities or the National Institutes of Health, or the Environmental Protection Agency.

REFERENCES

1 McClellan RO. Health effects of exposure to diesel exhaust particles. *Annu Rev Pharmacol Toxicol* 1987; **27**: 279–300.
2 Diaz-Sanchez D. The role of diesel exhaust particles and their associated polyaromatic hydrocarbons in the induction of allergic airway disease. *Allergy* 1997; **52**: 52–56, discussion 57–8.
3 Diaz-Sanchez D, Garcia MP, Wang M, Jyrala M, Saxon A. Nasal challenge with diesel exhaust particles can induce sensitization to a neoallergen in the human mucosa. *J Allergy Clin Immunol* 1999; **104**: 1183–1188.
4 Diaz-Sanchez D, Penichet-Garcia M, Saxon A. Diesel exhaust particles directly induce activated mast cells to degranulate and increase histamine levels and symptom severity. *J Allergy Clin Immunol* 2000; **106**: 1140–1146.
5 Diaz-Sanchez D, Jyrala M, Ng D, Nel A, Saxon A. *In vivo* nasal challenge with diesel exhaust particles enhances expression of the CC chemokines rantes, MIP-1alpha, and MCP-3 in humans. *Clin Immunol* 2000; **97**: 140–145.
6 Kagawa J. Health effects of diesel exhaust emissions—a mixture of air pollutants of worldwide concern. *Toxicology* 2002; **181-182**: 349–353.
7 Baulig A, Garlatti M, Bonvallot V, Marchand A, Barouki R, Marano F *et al.* Involvement of reactive oxygen species in the metabolic pathways triggered by diesel exhaust particles in human airway epithelial cells. *Am J Physiol Lung Cell Mol Physiol* 2003; **285**: L671–L679.
8 Lewtas J. Air pollution combustion emissions: characterization of causative agents and mechanisms associated with cancer, reproductive, and cardiovascular effects. *Mutat Res-Rev Mutat Res* 2007; **636**: 95–133.
9 Garshick E, Laden F, Hart JE, Rosner B, Davis ME, Eisen EA *et al.* Lung cancer and vehicle exhaust in trucking industry workers. *Environ Health Perspect* 2008; **116**: 1327-1332.
10 Holder AL, Lucas D, Goth-Goldstein R, Koshland CP. Cellular response to diesel exhaust particles strongly depends on the exposure method. *Toxicol Sci* 2007; **103**: 108–115.
11 Møller P, Folkmann JK, Forchhammer L, Bräuner EV, Danielsen PH, Risom L *et al.* Air pollution, oxidative damage to DNA, and carcinogenesis. *Cancer Lett* 2008; **266**: 84–97.
12 USEPA. *Health assessment document for diesel engine exhaust*. 1000, 2002.
13 Ris C. U.S. EPA Health Assessment for diesel engine exhaust: a review. *Inhal Toxicol* 2007; **19**: 229–239.
14 World Health Organization. *IARC: Diesel Engine Exhaust Carcinogenic* Lyon, France, 2012, Accessed on June 22, 2012 from http://www.press.iarc.fr/pr213_E.pdf.
15 Oberdorster G, Gelein RM, Ferin J, Weiss B. Association of particulate air pollution and acute mortality: involvement of ultrafine particles? *Inhal Toxicol* 1995; **7**: 111–124.
16 MacNee W, Donaldson K. Exacerbations of COPD: environmental mechanisms. *Chest* 2000; **117**: 390S–397SS.
17 Ibald-Mulli A, Wichmann H-E, Kreyling W, Peters A. Epidemiological evidence on health effects of ultrafine particles. *J Aerosol Med* 2002; **15**: 189–201.
18 Berry JP, Arnoux B, Stanislas G, Galle P, Chretien J. A microanalytic study of particles transport across the alveoli: role of blood platelets. *Biomedicine* 1977; **27**: 354–357.
19 Oberdörster G. Pulmonary effects of inhaled ultrafine particles. *Int Arch Occup Environ Health* 2001; **74**: 1–8.
20 Kreyling WG, Semmler M, Erbe F, Mayer P, Takenaka S, Schulz H *et al.* Translocation of ultrafine insoluble iridium particles from lung epithelium to extrapulmonary organs is size dependent but very low. *J Toxicol Environ Health Part A* 2002; **65**: 1513–1530.
21 Nemmar A, Hoylaerts MF, Hoet PH, Dinsdale D, Smith T, Xu H *et al.* Ultrafine particles affect experimental thrombosis in an in vivo hamster model. *Am J Respir Crit Care Med* 2002; **166**: 998–1004.
22 Oberdörster G, Sharp Z, Atudorei V, Elder A, Gelein R, Lunts A *et al.* Extrapulmonary translocation of ultrafine carbon particles following whole-body inhalation exposure of rats. *J Toxicol Environ Health Part A* 2002; **65**: 1531–1543.
23 Prahalad AK, Soukup JM, Inmon J, Willis R, Ghio AJ, Becker S *et al.* Ambient air particles: effects on cellular oxidant radical generation in relation to particulate elemental chemistry. *Toxicol Appl Pharmacol* 1999; **158**: 81–91.
24 Dockery DW, Luttmann-Gibson H, Rich DQ, Link MS, Mittleman MA, Gold DR *et al.* Association of air pollution with increased incidence of ventricular tachyarrhythmias recorded by implanted cardioverter defibrillators. *Environ Health Perspect* 2005; **113**: 670–674.
25 Park SK, O'Neill MS, Vokonas PS, Sparrow D, Schwartz J. Effects of air pollution on heart rate variability: the VA normative aging study. *Environ Health Perspect* 2005; **113**: 304–309.
26 Morawska L, Ristovski Z, Jayaratne ER, Keogh DU, Ling X. Ambient nano and ultrafine particles from motor vehicle emissions: characteristics, ambient processing and implications on human exposure. *Atmos Environ* 2008; **42**: 8113–8138.
27 El Paso Metropolitan Planning Office. *El Paso Border Improvement Plan*. *El Paso MPO* 2006; **1**: 1–123.

28 Lund AK, Lucero J, Harman M, Madden MC, McDonald JD, Seagrave JC *et al.* The oxidized low-density lipoprotein receptor mediates vascular effects of inhaled vehicle emissions. *Am J Respir Crit Care Med* 2011; **184**: 82–91.
29 Campen MJ, Lund AK, Knuckles TL, Conklin DJ, Bishop B, Young D *et al.* Inhaled diesel emissions alter atherosclerotic plaque composition in ApoE −/− mice. *Toxicol Appl Pharmacol* 2010; **242**: 310–317.
30 Lund AK, Lucero J, Lucas S, Madden MC, McDonald JD, Seagrave JC *et al.* Vehicular emissions induce vascular MMP-9 expression and activity associated with endothelin-1-mediated pathways. *Arterioscler Thromb Vasc Biol* 2009; **29**: 511–517.
31 Olvera HA, Li W-W, Garcia H. *Air Quality Characterization at the International Bridge of the Americas. Project No. A-08-4*. Editor; Southwest Consortium for Environmental Research and Policy: San Diego, CA, 2011.
32 Zietsman J, Villa JC, Forrest TL, Storey JM. *Mexican Truck Idling Emissions at the El Paso-Ciudad Juarez Border*, 2005.
33 Briggs D, Collins S, Elliot P, Fischer P, Kingham S, Lebret E *et al.* Mapping urban air pollution using GIS: a regression-based approach. *Int J Geogr Inf Sci* 1997; **11**: 699–718.
34 Brauer M, Hoek G, van Vliet P, Meliefste K, Fischer P, Gehring U *et al.* Estimating long-term average particulate air pollution concentrations: application of traffic indicators and geographic information systems. *Epidemiology* 2003; **14**: 228–239.
35 Morgenstern V, Zutavern A, Cyrys J, Brockow I, Gehring U, Koletzko S *et al.* Respiratory health and individual estimated exposure to traffic-related air pollutants in a cohort of young children. *Occup Environ Med* 2007; **64**: 8–16.
36 T Jolliffe I. *Principal component analysis*, 2002; 487.
37 TSI. *Aerosol Instrument Manager*, 2006 1–113Accessed on July 3, 2012 from: at http://www.tsi.com/uploadedFiles/Product.../1930038G-AIM-SMPS.pdf.
38 Janhall S, Olofson KFG, Andersson PU, Pettersson JBC, Hallquist M. Evolution of the urban aerosol during winter temperature inversion episodes. *Atmos Environ* 2006; **40**: 5355–5366.
39 Zhu Y, Hinds WC, Krudysz M, Kuhn T, Froines J, Sioutas C. Penetration of freeway ultrafine particles into indoor environments. *J Aerosol Sci* 2005; **36**: 303–322.
40 Zhu Y, Hinds W, Kim S, Sioutas C. Concentration and size distribution of ultrafine particles near a major highway. *J Air Waste Manage Assoc* 2002; **52**: 1032–1042.
41 Kittelson DB, Watts WF, Johnson JP. *Fine particle (nanoparticle) emissions on Minnesota highways*. Minnesota Department of Transportation, 2001; 75.
42 Olivares G, Johansson C, Ström J, Hansson H-C. The role of ambient temperature for particle number concentrations in a street canyon. *Atmos Environ* 2007; **41**: 2145–2155.
43 Seigneur C. Current Understanding of ultra fine particulate matter. *Coordinating Research Council*. Report-CRC-A66 2008; **1**: 1–41.
44 Hinds WC. *Aerosol Technology*. Wiley-Interscience, 1999.
45 Zhu Y, Kuhn T, Mayo P, Hinds WC. Comparison of daytime and nighttime concentration profiles and size distributions of ultrafine particles near a major highway. *Environ Sci Technol* 2006; **40**: 2531–2536.
46 Janhäll S, Jonsson ÅM, Molnár P, Svensson EA, Hallquist M. Size resolved traffic emission factors of submicrometer particles. *Atmos Environ* 2004; **38**: 4331–4340.
47 Nelson PRC, Taylor PA, MacGregor JF. Missing data methods in PCA and PLS: score calculations with incomplete observations. *Chemometr Intell Lab Syst* 1996; **35**: 45–65.
48 Zhu Y, Hinds W, Kim S, Shen S, Sioutas C. Study of ultrafine particles near a major highway with heavy-duty diesel traffic. *Atmos Environ* 2002; **36**: 4323–4335.
49 Franklin LM, Bika AS, Watts WF, Kittelson DB. Comparison of water and butanol based CPCs for examining diesel combustion aerosols. *Aerosol Sci Tech* 2010; **44**: 629–638.
50 Wang J, Storey J, Domingo N, Huff S, Thomas J, West B. Studies of diesel engine particle emissions during transient operations using an engine exhaust particle sizer. *Aerosol Sci Tech* 2006; **40**: 1002–1015.
51 Zhu Y, Eiguren-Fernandez A, Hinds WC, Miguel AH. In-cabin commuter exposure to ultrafine particles on Los Angeles freeways. *Environ Sci Technol* 2007; **41**: 2138–2145.
52 Cheng Y-H, Huang C-H, Huang H-L, Tsai C-J. Concentrations of ultrafine particles at a highway toll collection booth and exposure implications for toll collectors. *Sci Total Environ* 2010; **409**: 364–369.
53 Wheatley ADA, Sadhra SS. Occupational exposure to diesel exhaust fumes. *Ann Occup Hyg* 2004; **48**: 369–376.
54 Wake D, Mark D, Northage C. Ultrafine aerosols in the workplace. *Ann Occup Hyg* 2002; **46**: 235–238.
55 Noble C, Mukerjee S, Gonzales M, Rodes CE, Lawless PA, Natarajan S *et al.* Continuous measurement of fine and ultrafine particulate matter, criteria pollutants and meteorological conditions in urban El Paso, Texas. *Atmos Environ* 2003; **37**: 827–840.
56 Reponen T, Grinshpun SA, Trakumas S, Martuzevicius D, Wang Z-M, LeMasters G *et al.* Concentration gradient patterns of aerosol particles near interstate highways in the Greater Cincinatti airshed. *J. Environ Monit* 2003; **5**: 557–562.
57 Zhang Q, Zhu Y. Measurements of ultrafine particles and other vehicular pollutants inside school buses in South Texas. *Atmos Environ* 2010; **44**: 253–261.

EXHIBIT D

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

NOTE: Some data may have been evaluated by the TCEQ Toxicologists. Click here to see Toxicological Evaluations.

NOTE: Information shown on this page is subject to change without notice.

Show Active Sites Only

Sort: Name / AQS Code

Select Site: El Paso Chamizal (481410044) Display Site

El Paso Chamizal

Basic Information | Monitoring Information | Photos | Validated Data

NOTE: Only valid and validated measurements are displayed on this page.

Select Sampler *

PM2.5 (FRM) 0001

Enter A Date Range

Leave date range blank to retrieve most recent data

Format: [MM/DD/YYYY]

Start (inclusive): 01/01/2023 End (exclusive): 10/01/2023

Duration

Do not select a duration to default to the most common duration for the date range

24 HOURS

Display

September 2023

Code	Name	Units	POC	Sep 03	Sep 06	Sep 09	Sep 12	Sep 15	Sep 18	Sep 21	Sep 24	Sep 27	Sep 30
88101	Pm2.5 - Local Conditions	ug/m3 (LC)	01	14.80000	16.20000	11.30000	5.90000	*4.20000*	9.60000	6.70000	4.80000	9.80000	9.70000

August 2023

Code	Name	Units	POC	Aug 01	Aug 04	Aug 07	Aug 10	Aug 13	Aug 16	Aug 19	Aug 22	Aug 25	Aug 28	Aug 29	Aug 31
88101	Pm2.5 - Local Conditions	ug/m3 (LC)	01	IV	11.30000	20.10000	4.70000	*3.80000*	12.30000	6.50000	15.50000	6.70000	IV	6.30000	10.80000

July 2023

Code	Name	Units	POC	Jul 02	Jul 05	Jul 08	Jul 11	Jul 14	Jul 17	Jul 20	Jul 23	Jul 26	Jul 29
88101	Pm2.5 - Local Conditions	ug/m3 (LC)	01	IV	11.50000	8.50000	8.80000	*6.90000*	14.90000	11.10000	IV	IV	IV

June 2023

Code	Name	Units	POC	Jun 02	Jun 05	Jun 08	Jun 11	Jun 14	Jun 17	Jun 20	Jun 23	Jun 26	Jun 29
88101	Pm2.5 - Local Conditions	ug/m3 (LC)	01	6.00000	6.80000	6.00000	*5.10000*	6.10000	9.90000	10.40000	14.60000	21.60000	9.90000

May 2023

Code	Name	Units	POC	May 03	May 06	May 09	May 12	May 15	May 18	May 21	May 24	May 27	May 30
88101	Pm2.5 - Local Conditions	ug/m3 (LC)	01	8.90000	4.80000	8.50000	IV	*4.00000*	IV	IV	IV	5.80000	6.60000

April 2023

Code	Name	Units	POC	Apr 03	Apr 06	Apr 09	Apr 12	Apr 15	Apr 18	Apr 21	Apr 24	Apr 27	Apr 30
88101	Pm2.5 - Local Conditions	ug/m3 (LC)	01	6.80000	7.60000	IV	12.40000	6.30000	4.50000	IV	IV	*4.00000*	10.00000

March 2023

Code	Name	Units	POC	Mar 01	Mar 04	Mar 07	Mar 10	Mar 13	Mar 14	Mar 16	Mar 19	Mar 22	Mar 25	Mar 28	Mar 31
88101	Pm2.5 - Local Conditions	ug/m3 (LC)	01	*15.10000*	*15.10000*	IV	IV	IV	IV	IV	IV	IV	IV	IV	IV

February 2023

Code	Name	Units	POC	Feb 02	Feb 05	Feb 08	Feb 11	Feb 14	Feb 17	Feb 20	Feb 23	Feb 26
88101	Pm2.5 - Local Conditions	ug/m3 (LC)	01	8.20000	28.30000	3.50000	8.00000	3.50000	IV	*3.20000*	9.30000	23.20000

January 2023

Code	Name	Units	POC	Jan 03	Jan 06	Jan 09	Jan 12	Jan 15	Jan 18	Jan 21	Jan 24	Jan 27	Jan 30
88101	Pm2.5 - Local Conditions	ug/m3 (LC)	01	2.50000	12.80000	17.60000	4.00000	6.20000	***1.90000***	3.90000	2.90000	**17.70000**	IV

Maximum values for each parameter are **bold underlined** within the table. Minimum values are ***bold italic***.
Non-detects are displayed as 'ND'. Measurements not yet validated are displayed as 'NV'. Invalid measurements are displayed as 'IV'. Measurements not found for a time period are displayed as 'NF'.

Data File: Data20240222144629404.txt

Start Report

NOTE: Throughout the TAMIS portion of the TCEQ website, users can access valid, validated, ambient (non-QC) data.

indicates that this control alters the webpage in some way without refreshing. Selecting the lightning bolt will explain what changes will occur.

indicates that a more detailed list exists. Selecting the book will open a popup window with the detailed list.

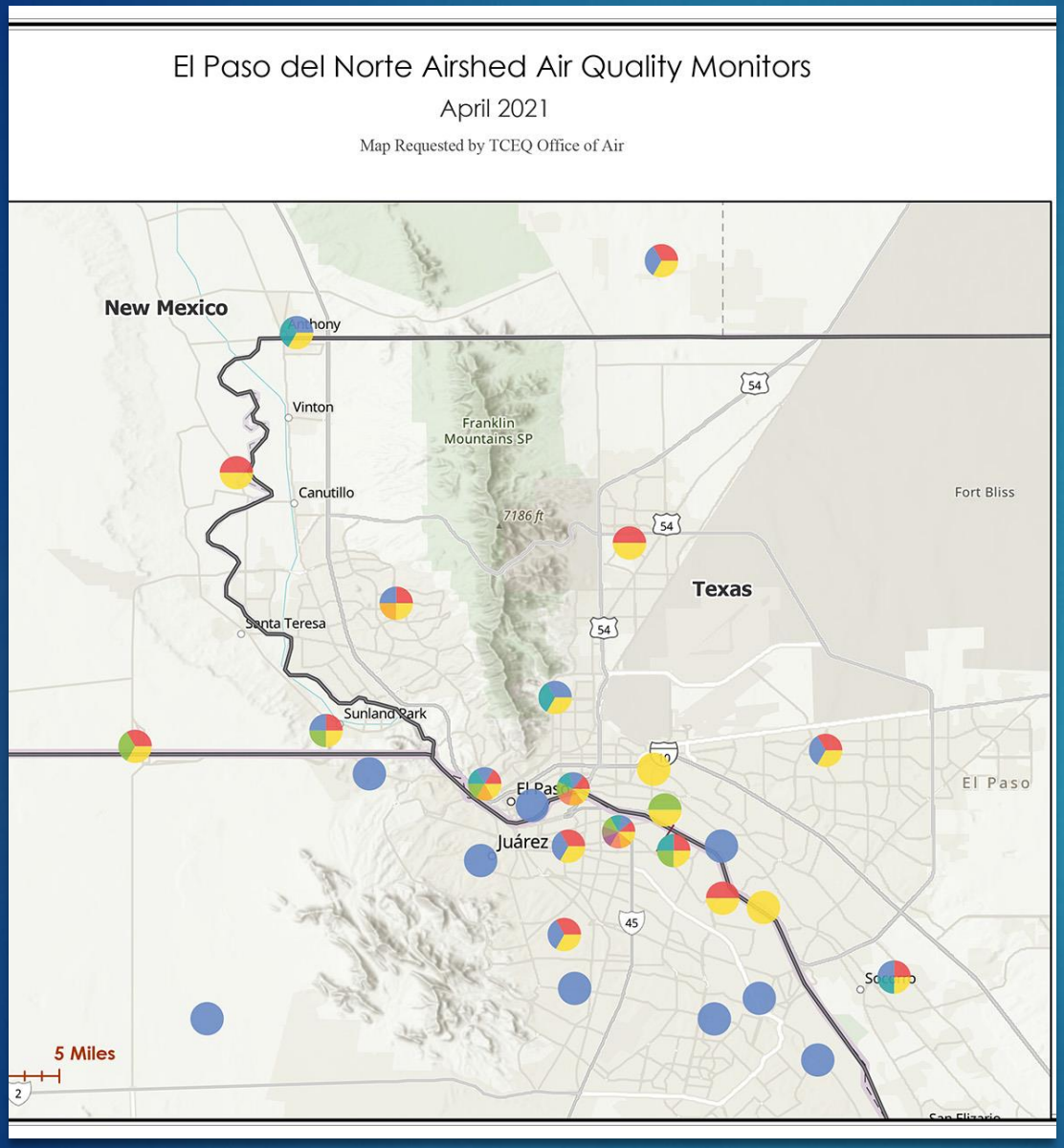
EXHIBIT C

Paso del Norte Air Quality Report | February 20, 2024

Dr. Carlos Rincon, US EPA Region 6

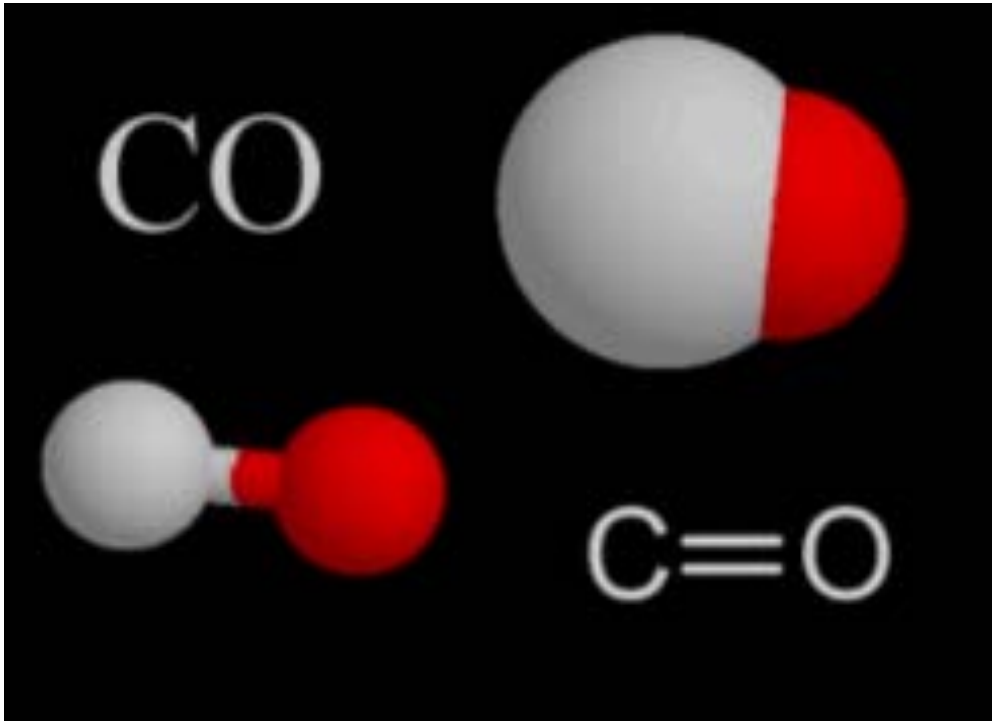
Overview

- Current air monitoring networks
- January – December 2023 data by pollutant with design values for each country
- Open discussion

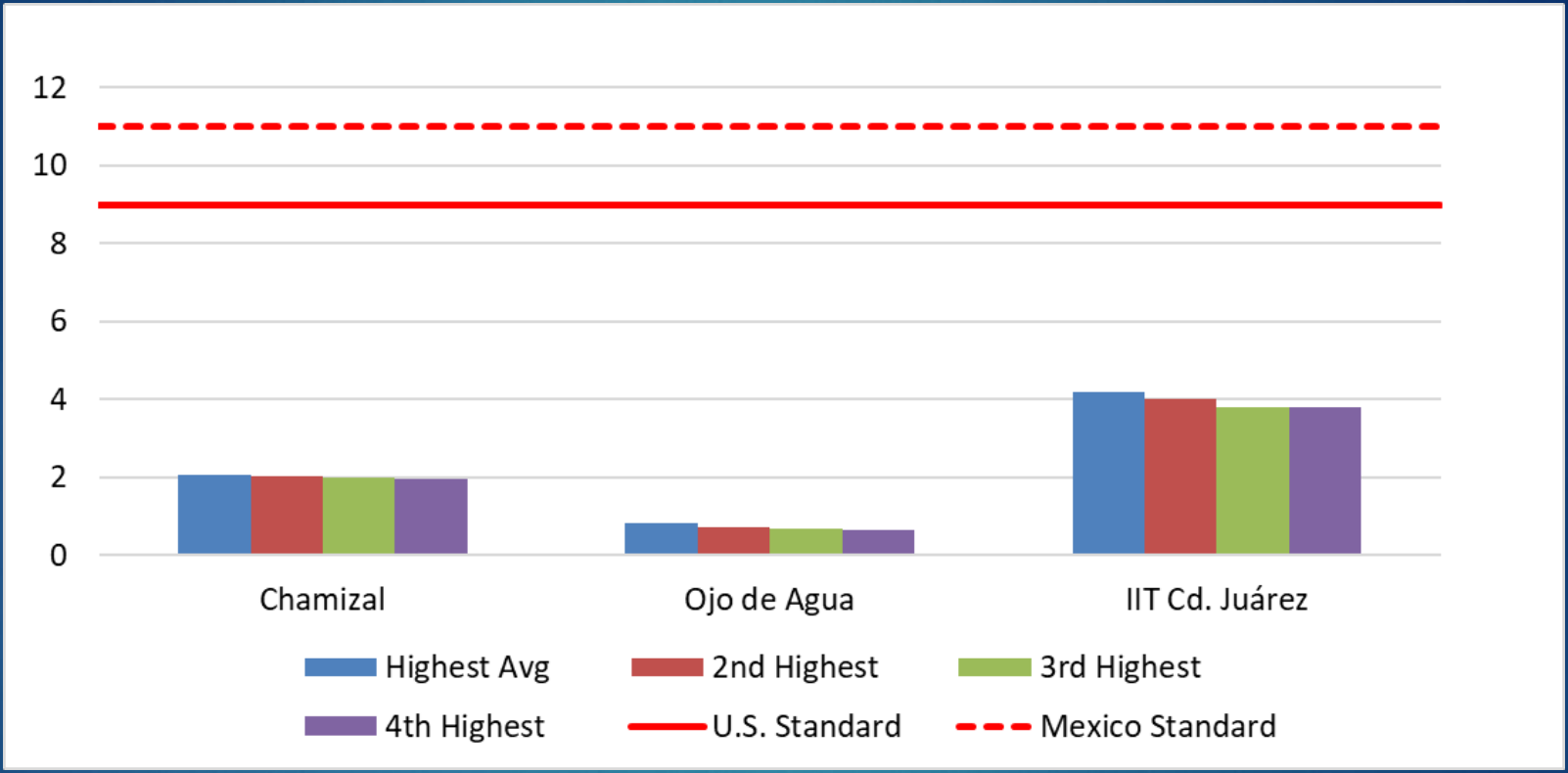


Paso del Norte Air Monitoring Stations

Carbon monoxide (CO) Monóxido de carbono



CO 8 Hr. Averages Four Highest Values in (ppm)
El Paso and Ciudad Juárez (January – December 2023)



The **U.S. federal standard**, **9.0 ppm**, is violated when more than one reading at the same monitor in one calendar year is at or above that value.

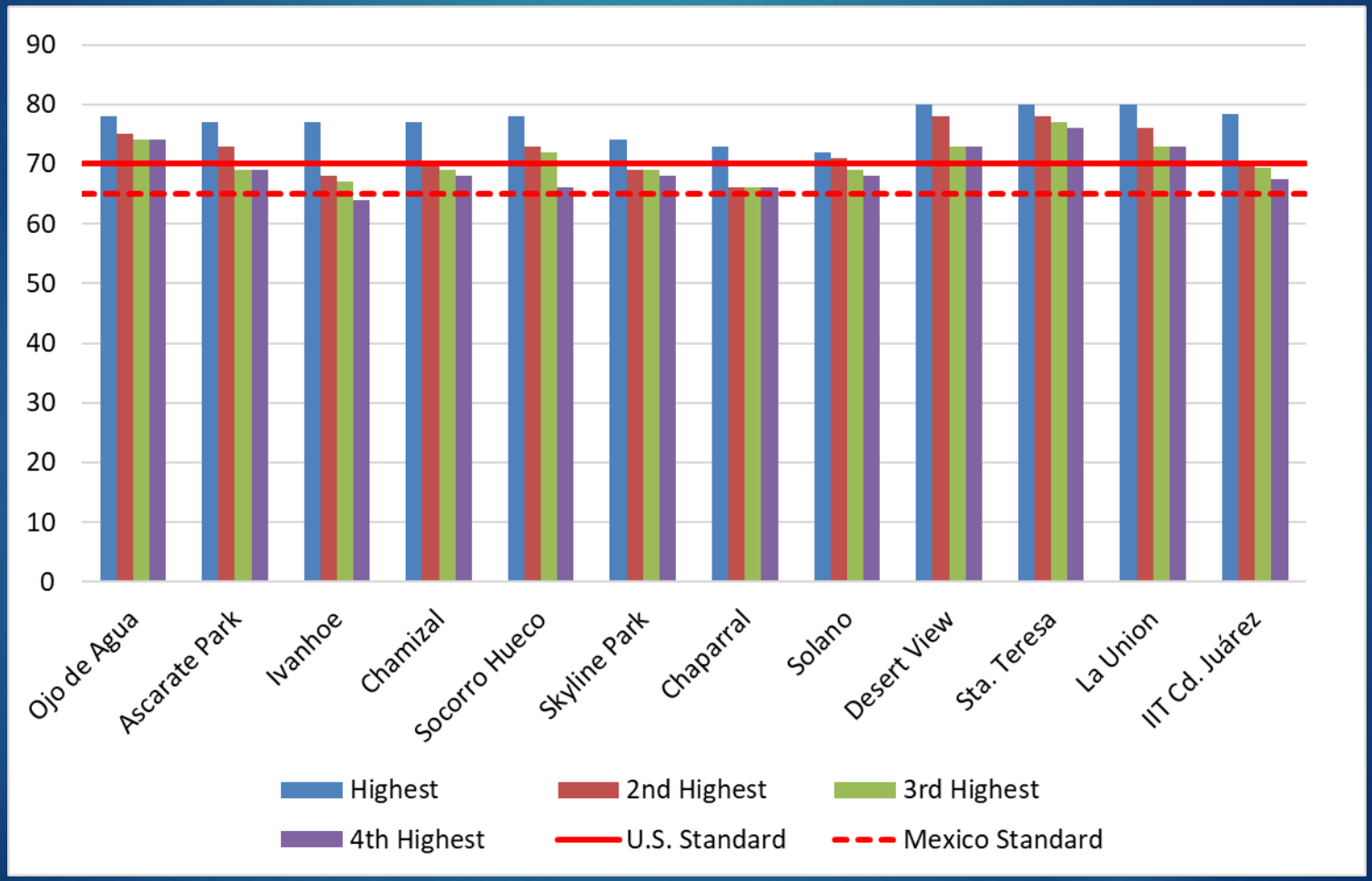
The **Mexico federal standard** is a highest allowable limit of 11 ppm.

Ozone (O_3) Ozono

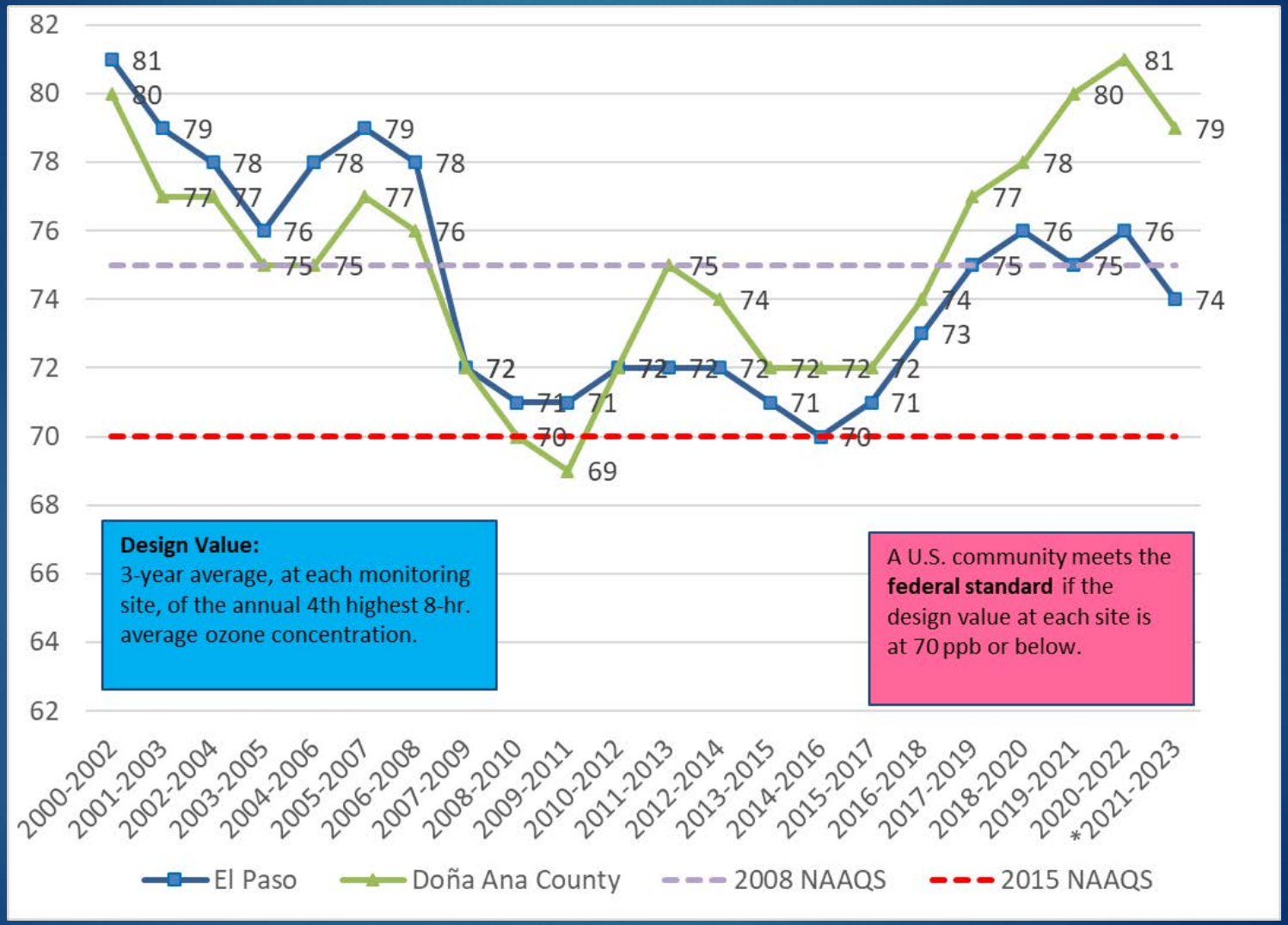
Ozone 8-Hour Averages
Highest Values at Monitors in the Paso del Norte
(January – December 2023)

U.S. federal standard:
70 ppb for the 3-year average of the 4th highest value

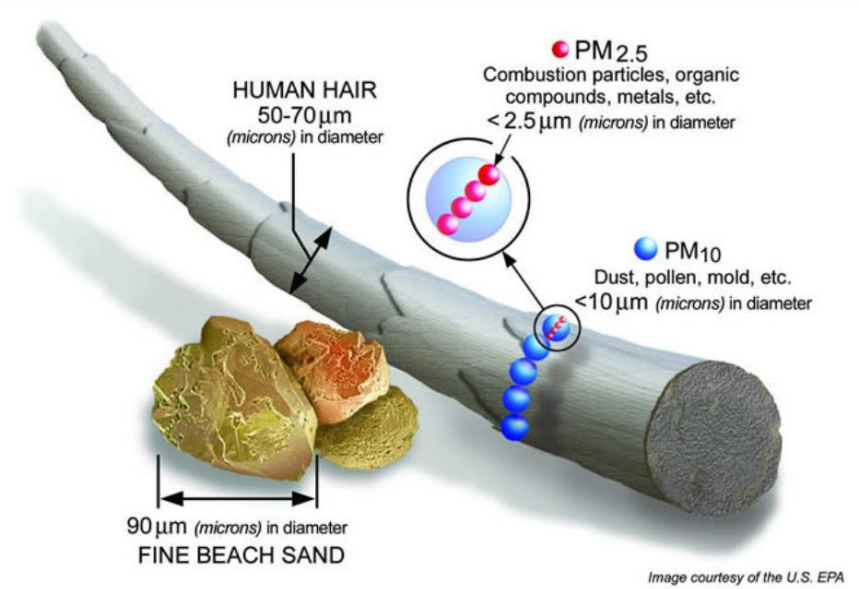
The maximum permissible limit in Mexico:
65ppb on an 8-hour moving average



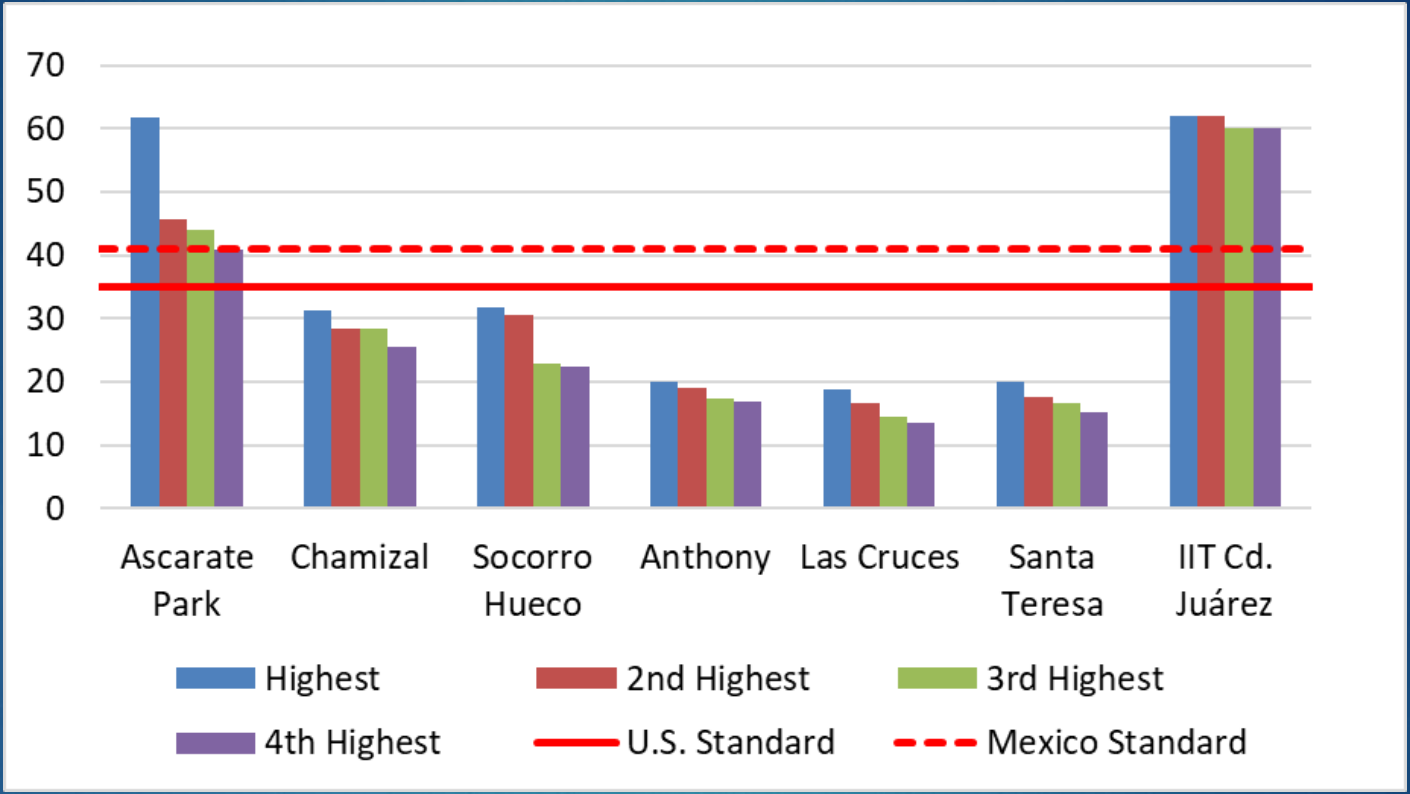
Ozone 8-Hr. Design Values | El Paso and Doña Ana County (highest value of all sites in each area, 2002 – 2023*)



Particulate Matter (PM) Material Particulado



$PM_{2.5}$ 24-Hour Averages ($\mu g/m^3$) Four Highest El Paso, Doña Ana County, and Ciudad Juarez January – December 2023



U. S. federal standards:
The standard for 24-hr averages, 35 ug/m3, is violated if it is exceeded by the average over any three-year period, of the annual 98th percentile

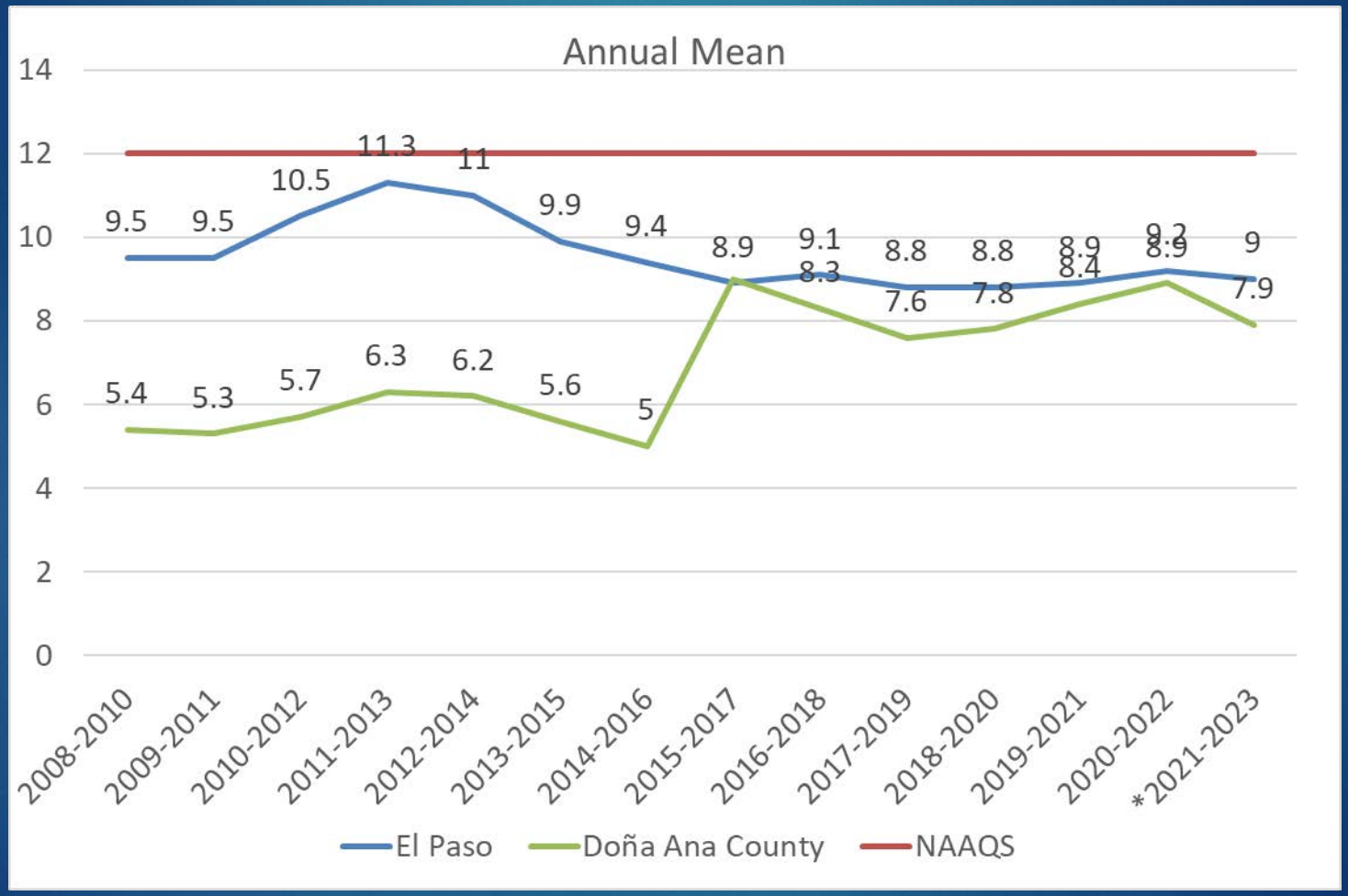
The highest allowable limit in Mexico for $PM_{2.5}$ is 41 ug/m3, in 24-hour averages.

* **Special Purpose Monitors-Non-validated Data**

Note: El Paso County (Ascarate Park and Socorro Hueco) data are Federal Refence Methods (FRM) monitors while DAC are Federal Equivalent Method (FEM).

$PM_{2.5}$ Compliance with U.S. Federal Standard
El Paso and Doña Ana Counties

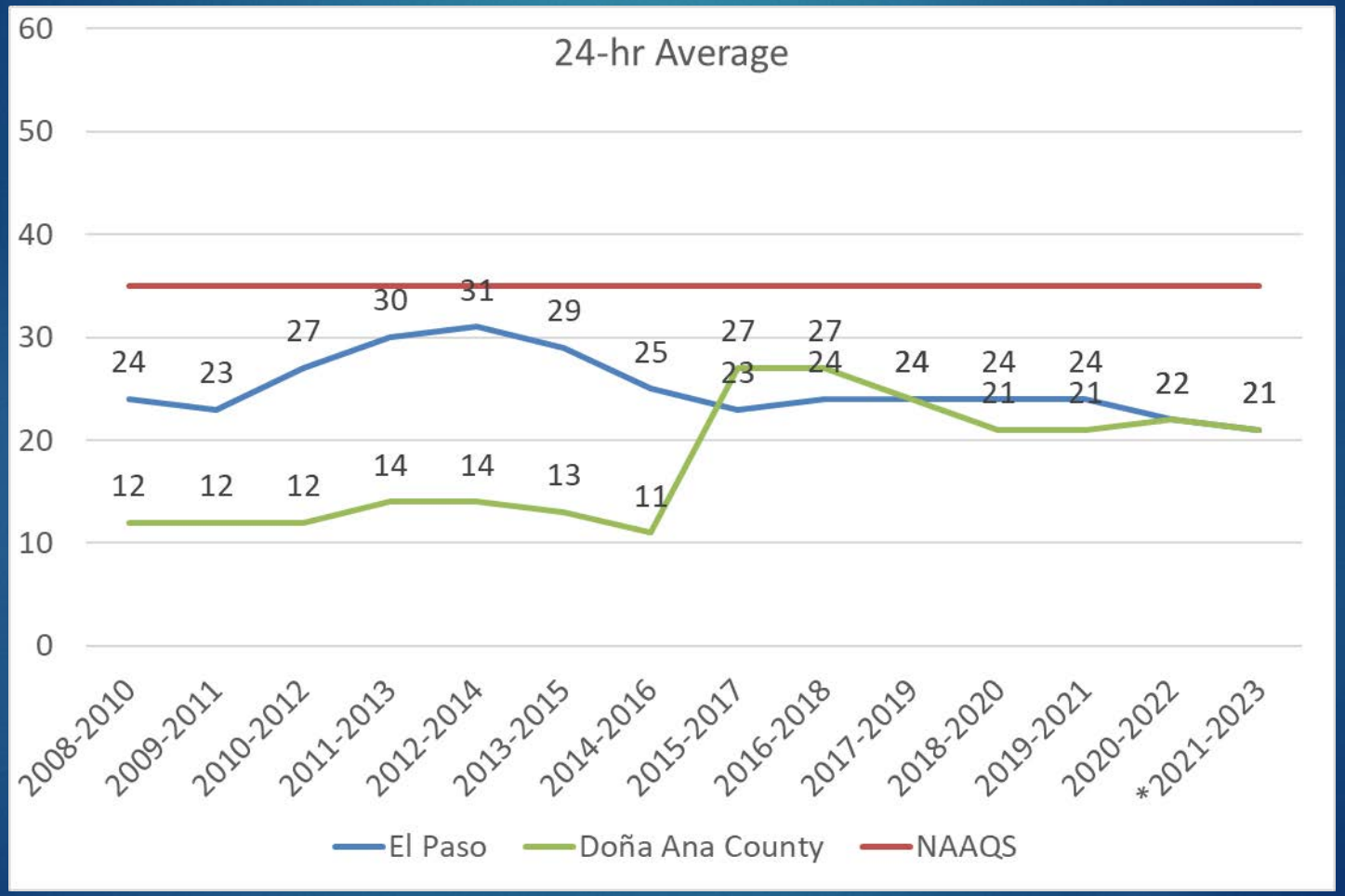
Annual Design Value U.S. Standard: 12 µg/m³



$PM_{2.5}$ Compliance with U.S. Federal Standard
El Paso and Doña Ana Counties

24-Hour Design Value

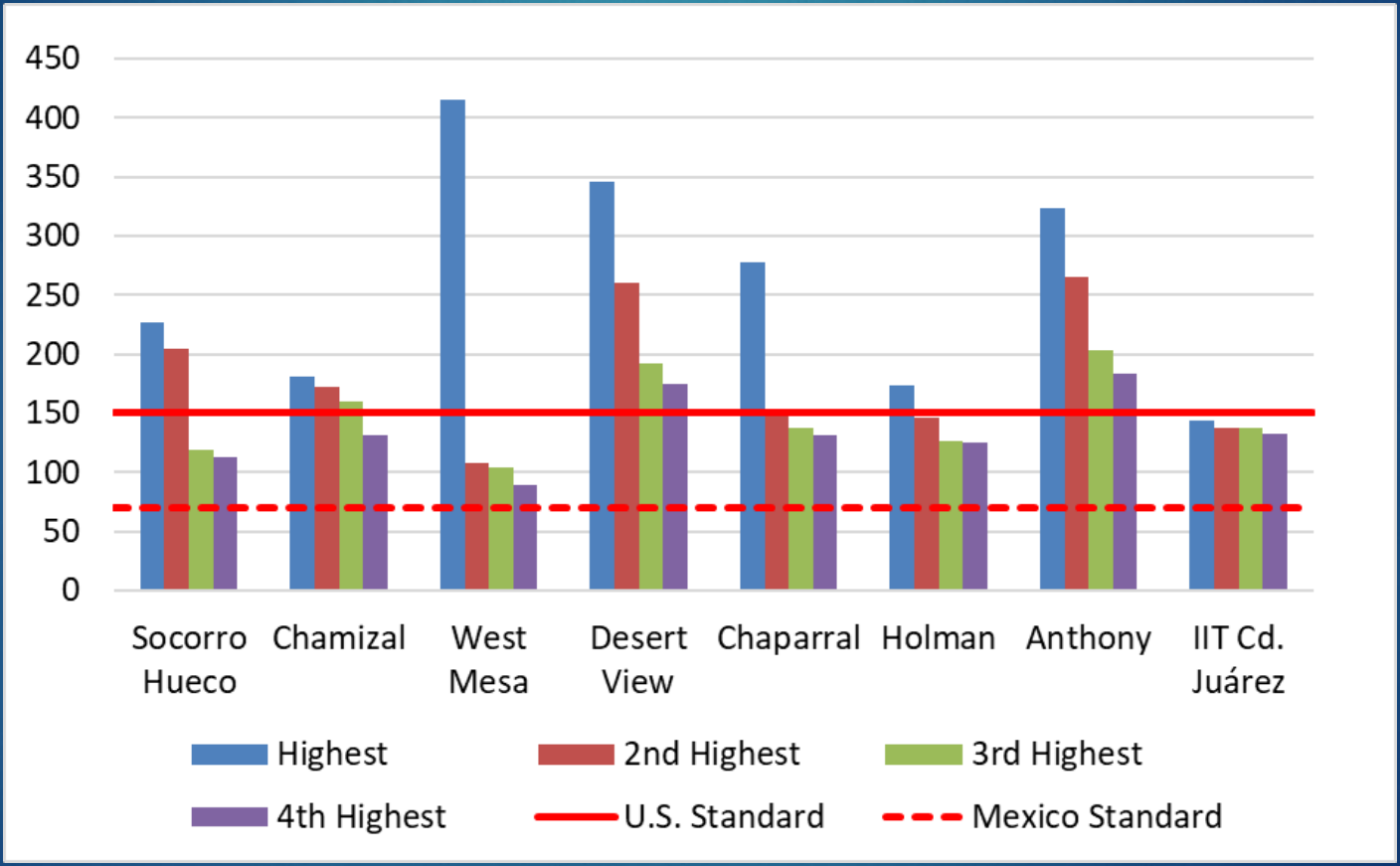
U.S. Standard 35 $\mu g/m^3$



PM_{10} 24-Hour Averages (µg/m^3) Four Highest El Paso, Doña Ana County, and Ciudad Juarez January – December 2023

U.S. federal standard:
150 µg/m^3 not to be exceeded more than once per year on average over three years at any one monitor.

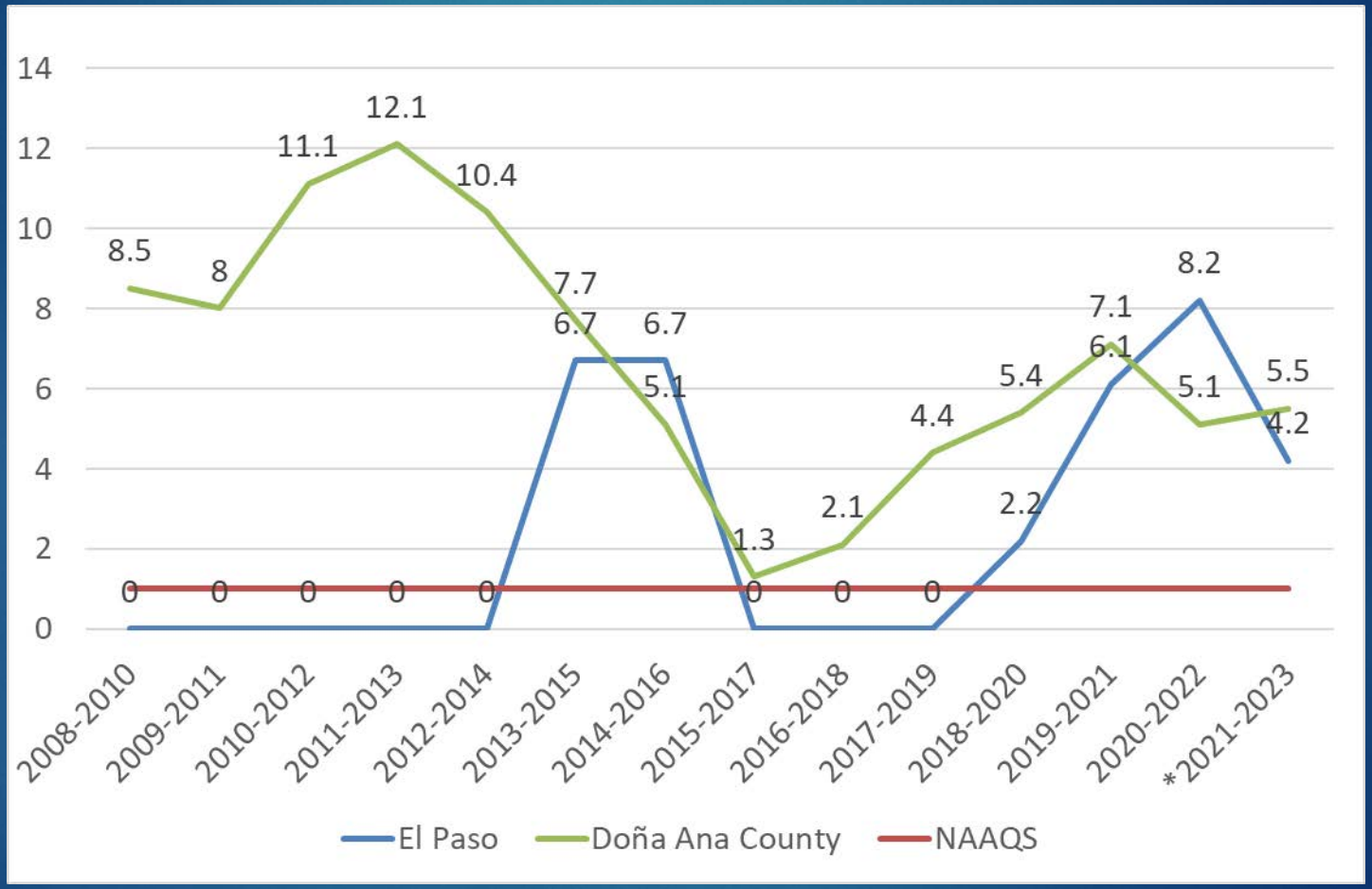
The maximum permissible limit in Mexico for PM_{10} is 70 µg/m^3 on a 24-hour average



Note: All NMED data has been flagged as exceptional events for high wind.

*PM_{10} 24-Hour Design Values
El Paso and Doña Ana County | 2008 – 2023*

Estimated Number of Exceedances



*EPA exceptional events concurrences not reflected for Doña Ana County. - EPA Currently has an EE packet on hand from NMED

Exceptional Events | Doña Ana County

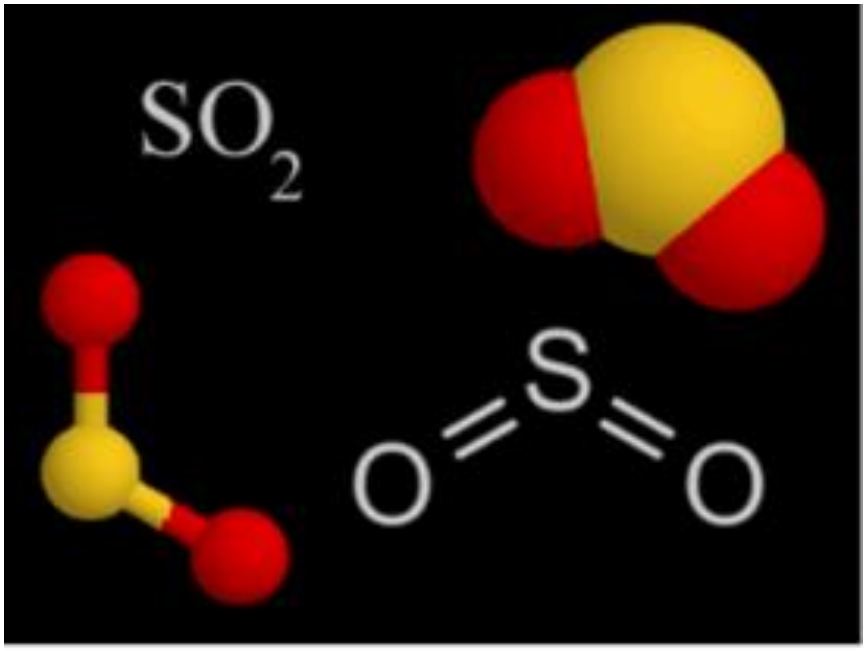
- High-Wind Blowing Dust PM_{10} Exceedances of NAAQS

Year	Events	Observed Exceedances	Concentrations (µg/m³)	EPA Review Process
2022	15	30	157 - 879	Internal QA/QC
2021	15	31	157 - 769	Submitted
2020	8	13	157- 504	Concurrence
2019	8	25	156-734	Concurrence
2018	7	18	158-326	Concurrence
2017	11	27	157-721	Concurrence
2016	11	28	162-689	Concurrence

Compliance with exposure limits: Annual arithmetic mean of PM 2023 in Ciudad Juarez

Parameter	Annual exposure limit	Annual mean
$PM_{2.5}$	10 µg/m^3	*22 µg/m^3
PM_{10}	28 µg/m^3	*59 µg/m^3

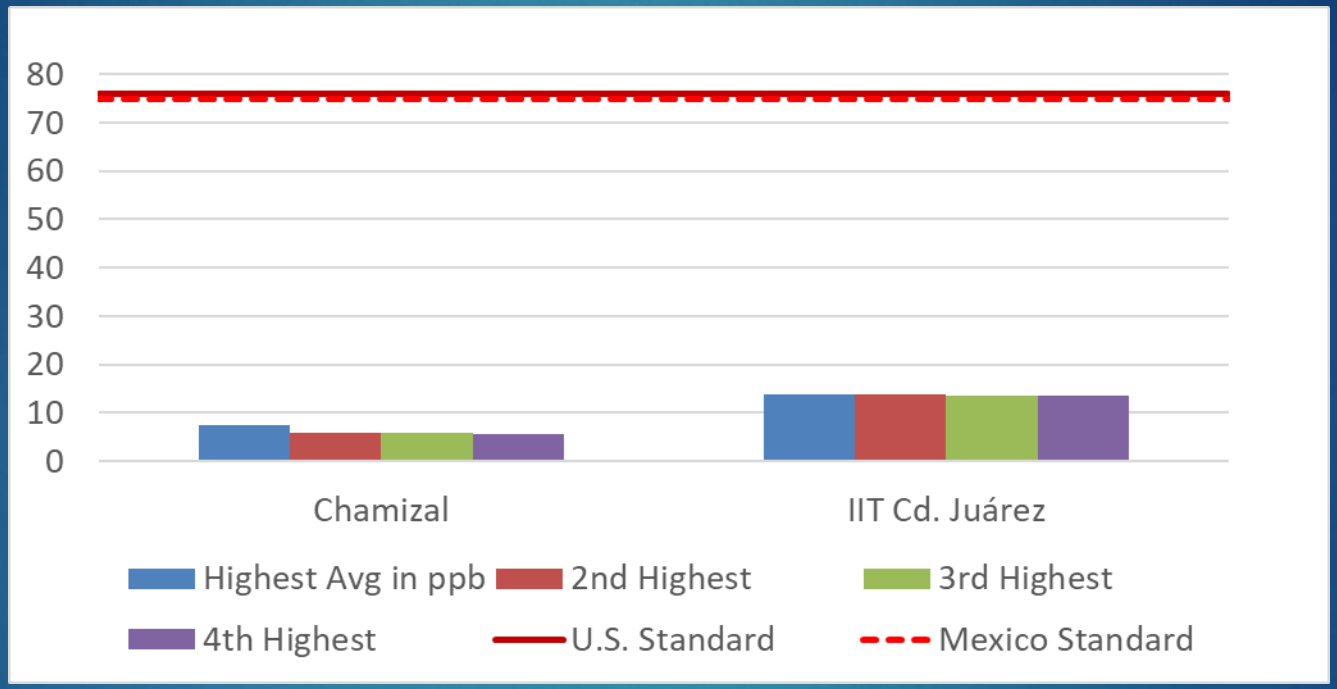
*Dust storm events are considered within this information.



Sulfur Dioxide SO_2 Dióxido de azufre

SO_2 1-Hour Averages | Four Highest

El Paso and Ciudad Juarez | January – December 2023

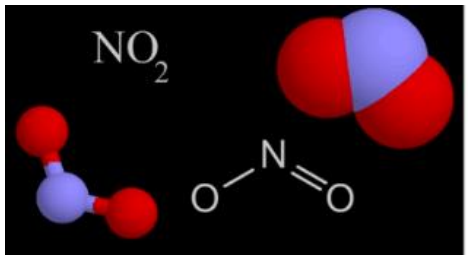


U.S. federal standard:
76 ppb **99th** percentile of 1-hour daily maximum concentrations, averaged over 3 years

The highest allowable limit in Mexico for SO_2 is 75 ppb in 1-hour average.

Nitrogen Dioxide NO_2

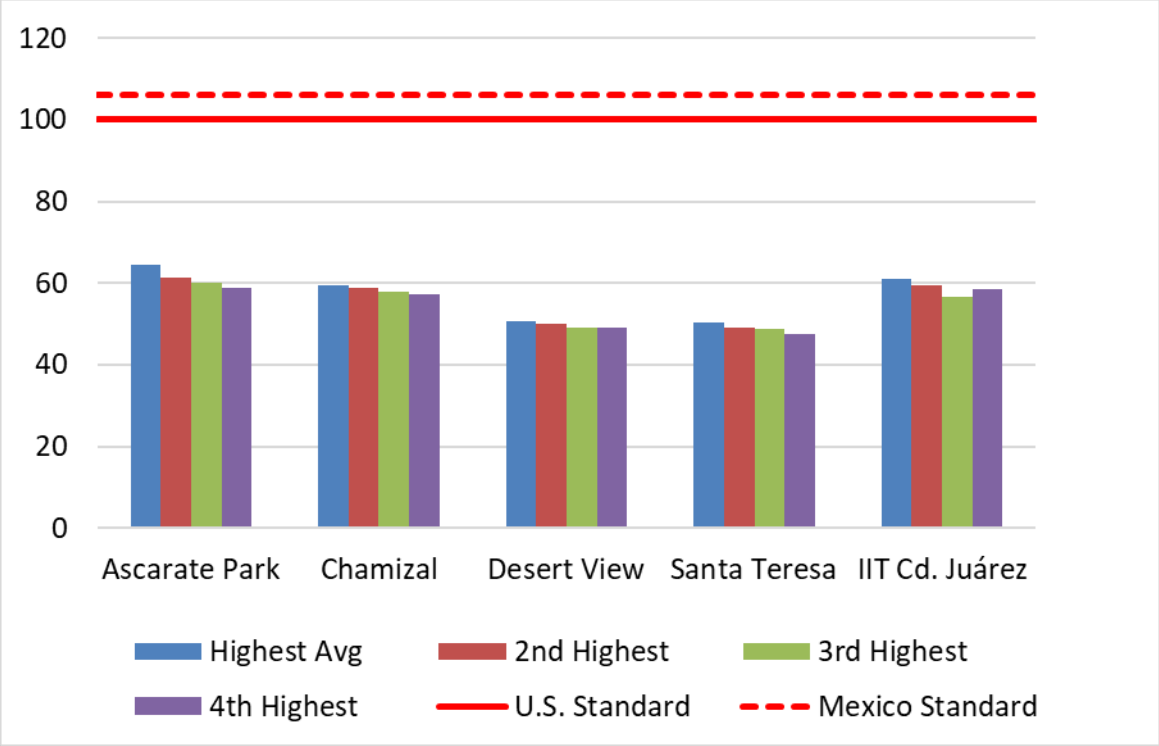
Dióxido de nitrogéno



NO_2 1-Hour Averages (ppb) Four Highest
El Paso del Norte
January – December 2023

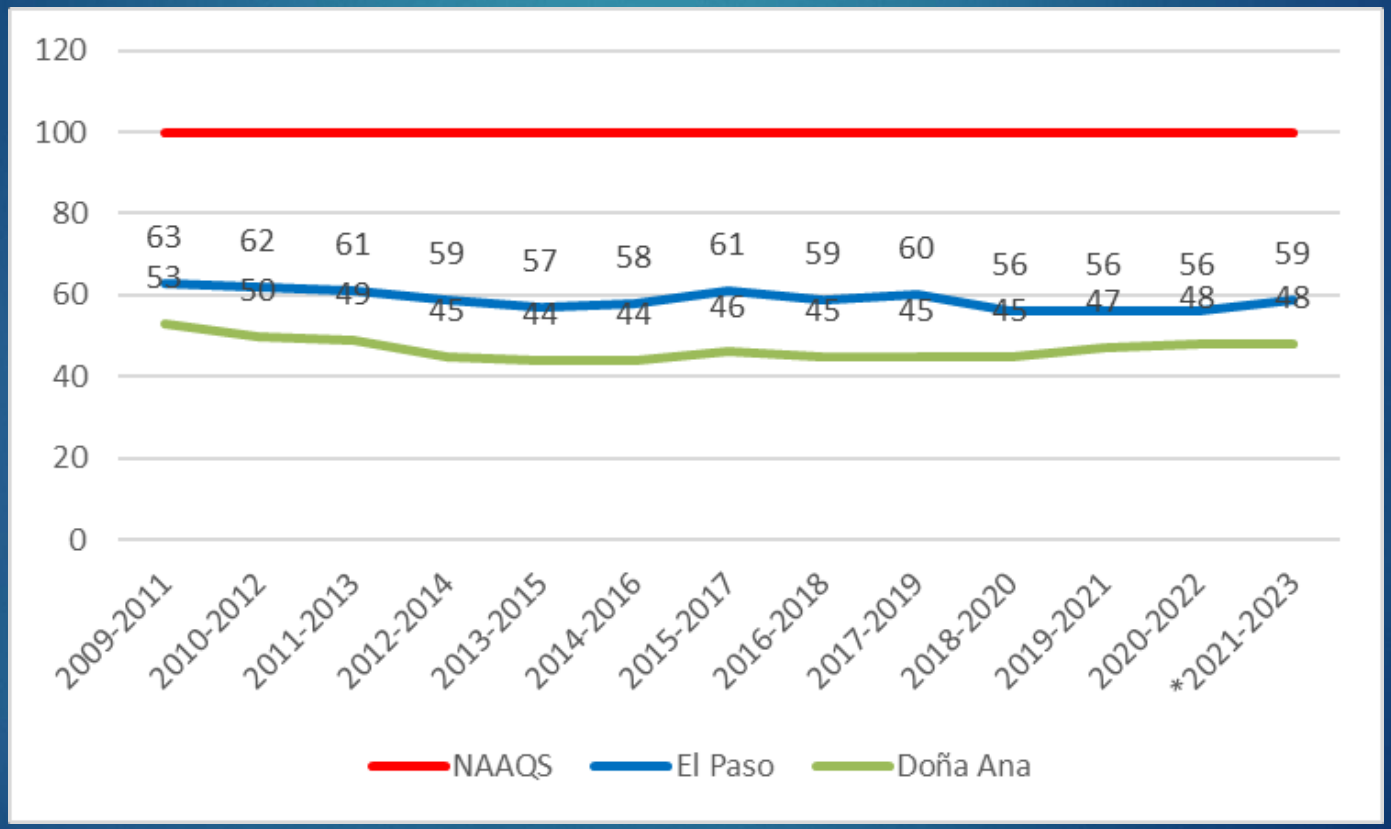
U.S. federal standard:
100 ppb **98th** percentile of 1-hour daily maximum concentrations, averaged over 3 **years**

The highest allowable limit in Mexico for NO_2 is 106 ppb in hourly averages.



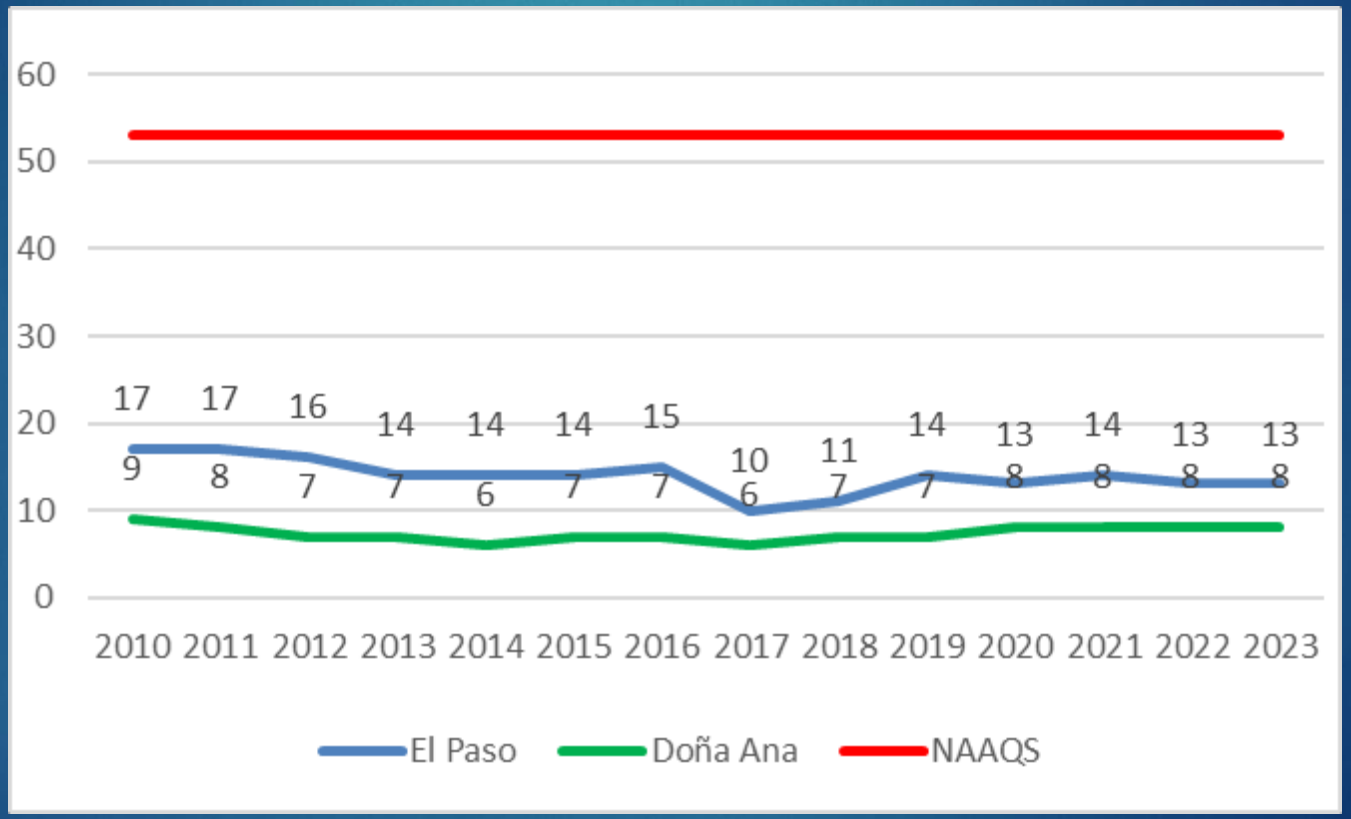
NO_2
Design Values 1-Hour Averages (ppb)
El Paso & Doña Ana Counties

The 1-hour NO2 NAAQS **(100 ppb)** is the 3-year average of the annual 98th percentile of the daily maximum 1-hour average concentrations.



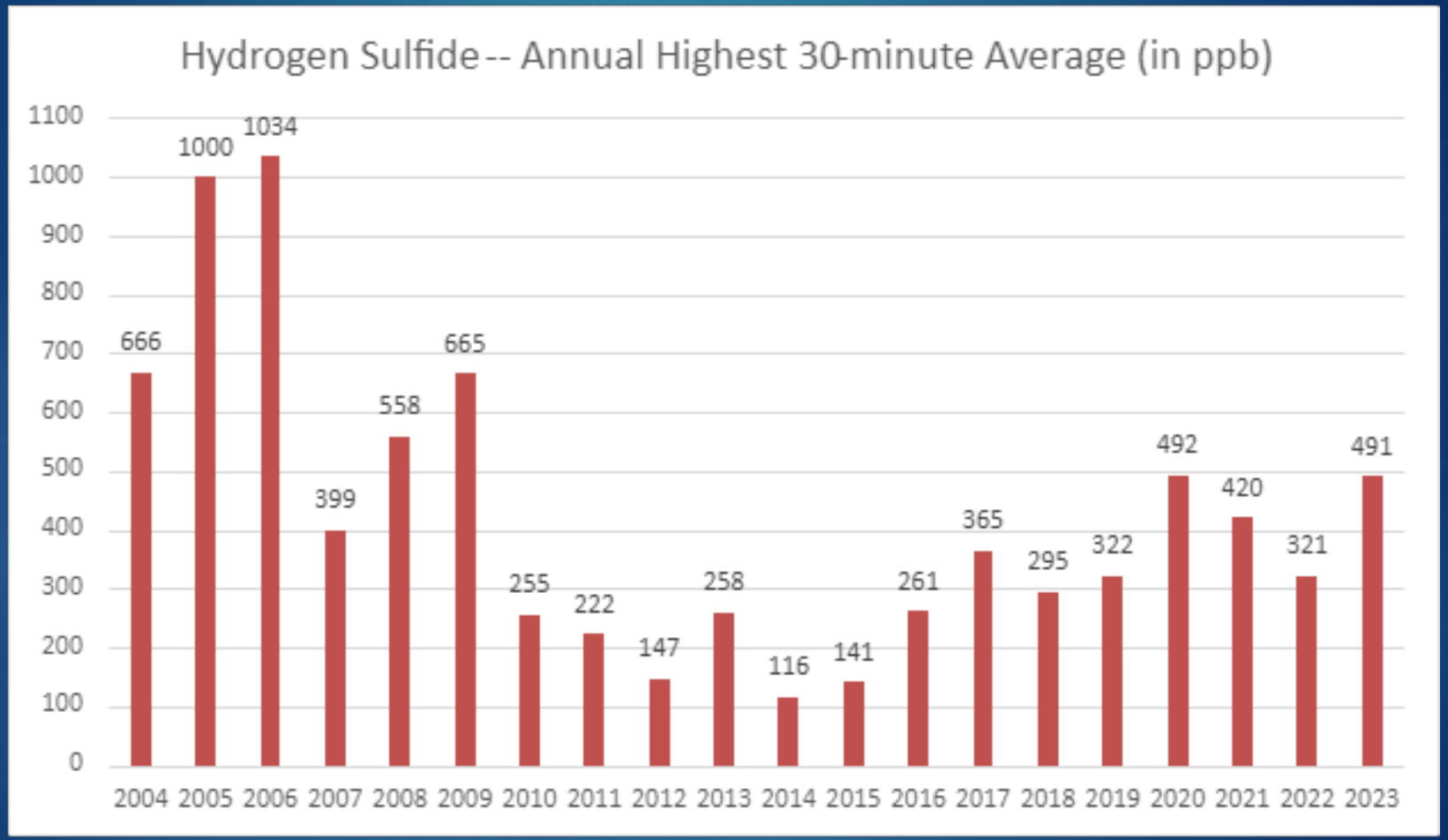
NO_2
Design Values Annual Mean (ppb)
El Paso & Doña Ana Counties

The annual NO2 NAAQS (53 ppb) is the annual average concentration, averaged over three years.

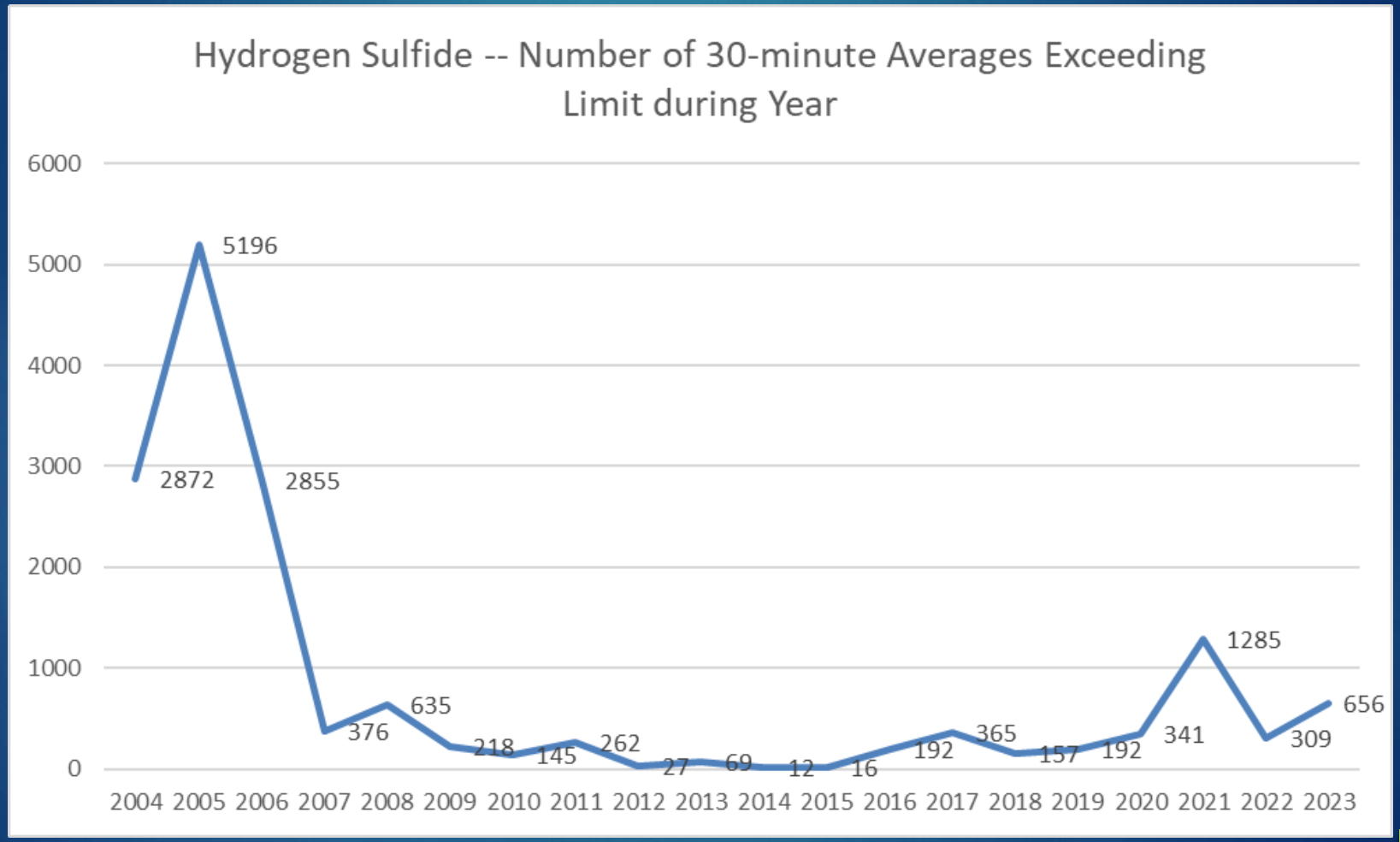


Hydrogen Sulfide (H_2S) Sulfuro de hidrógeno

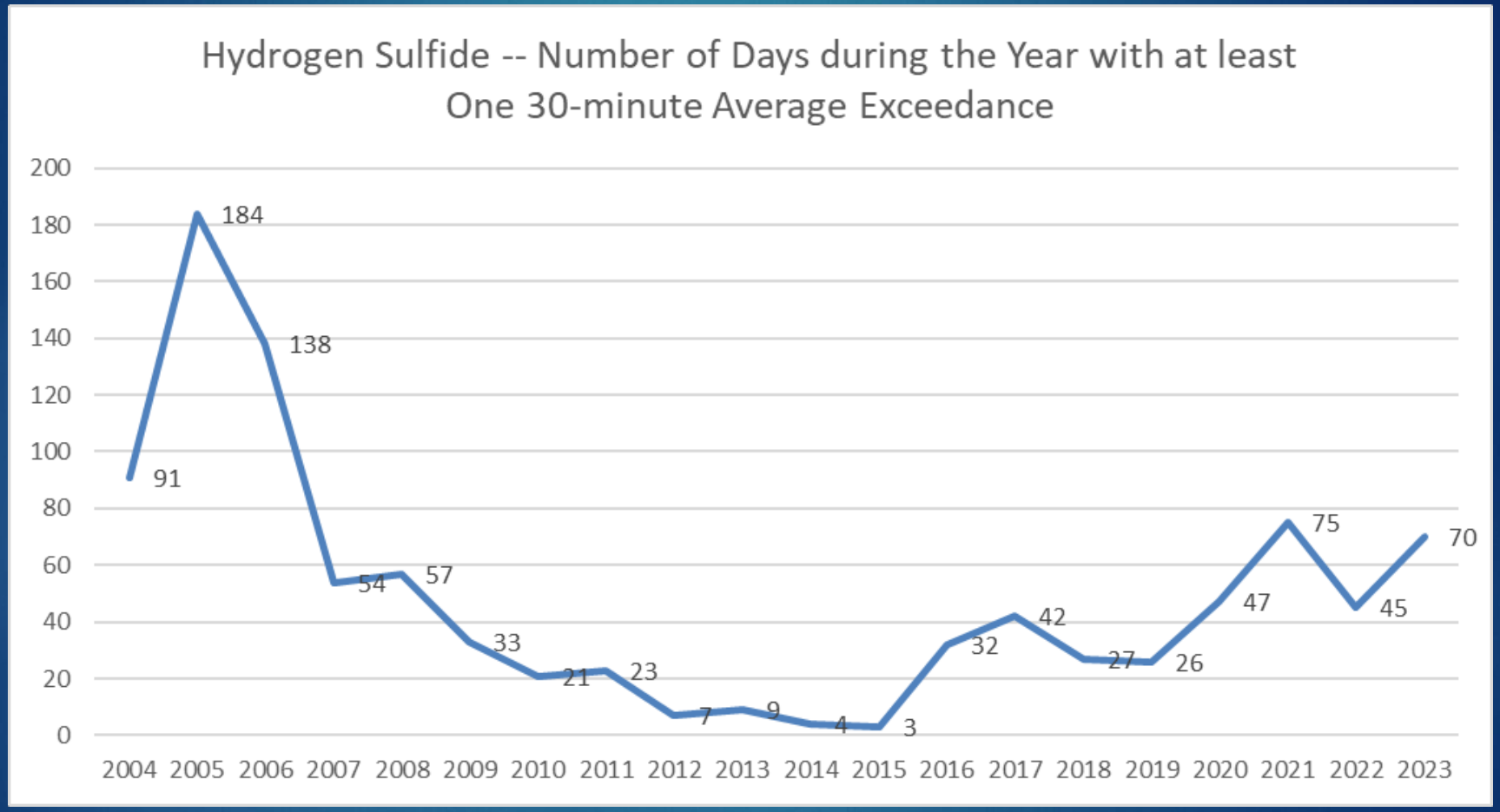
Hydrogen Sulfide | 30-Minute Averages (ppb)
Highest Value at "Lower Valley" Monitor
2004-2023



Hydrogen Sulfide | 30-Minute Averages (ppb)
Number of Exceedances at "Lower Valley" Monitor
2004-2023



Hydrogen Sulfide | 30-Minute Averages
Number of Days with Exceedances at "Lower Valley" Monitor
2004-2023



Questions?
¿Preguntas?

Links to publicly available U.S. data:

- EPA Air Trends
- Design Value Interactive Tool | US EPA
- Our Nation's Air 2023 (epa.gov)
- Daily Mean Values for Calendar Year 2023 (texas.gov)

SDUE
francisco.gomez@chihuahua.gob.mx

Gobierno Municipal
ricardoaragonb@gmail.com

NMED
Armando Paz
armando.paz@state.nm.us

TCEQ
Border Affairs
ba@tceq.texas.gov

HEROICA CIUDAD JUÁREZ
Gobierno Municipal 2021-2024

CHIHUAHUA
GOBIERNO DEL ESTADO
Juntos Sí podemos

SECRETARÍA DE DESARROLLO URBANO Y ECOLOGÍA

Thank you!
Gracias!

EXHIBIT E

WEN-WHAI LI, Ph.D., P.E., Q.E.P.

EDUCATION

Ph.D.,	Civil Engineering, Colorado State University
M.S.,	Civil Engineering, Colorado State University
B.S.E.,	Civil Engineering, National Taiwan University

CERTIFICATIONS

P.E.	Licensed Professional Engineer (Illinois No. 062-050969)
	Licensed Professional Engineer (Texas No. 85765)
Q.E.P.	Qualified Environmental Professional (No. 04960063)
Certificate	Hazardous Waste Site Investigation Personnel (40-Hrs OSHA Health and Safety Training Course)

POSITION HELD

2006 – present	Professor
2004 - 2009	Chair
2000 – 2003	Graduate Advisor
1997 – 2006	Associate Professor Department of Civil Engineering The University of Texas at El Paso
2002 – present	Adjunct Associate Professor Environmental Sciences The University of Texas Health Science Center at Houston School of Public Health
1988 - 1996	Senior Associate and Senior Science Advisor Environ International Corporation Princeton, New Jersey
1984 – 1987	Research Associate Fluid Mechanics and Diffusion Laboratory Department of Civil Engineering Colorado State University

EXPERIENCE

Dr. Li is Professor of Civil Engineering at the University of Texas at El Paso (UTEP). He has a broad engineering background with expertise in the following areas:

- Air Toxics Characterization, Exposure, and Health Effects
- Air Pollution Monitoring and Modeling
- Traffic-related air pollution impact and health effects

- Environmental Exposure and Risk Assessment
- Accident Analysis
- Emission Modeling
- Physical Modeling of Air Pollution and Atmospheric Environment
- Rooftop Emission-Intake Design

ACTIVE RESEARCH PROJECTS

1. Tier 1 University Transportation Center Focusing on The Statutory Research Priority Area of Preserving the Environment and the Primary USDOT Strategic Plan Goal of Equity, with the secondary goals of Climate and Sustainability as well as Transformation, *Center for Advancing Research* in Transportation Emissions, Energy and Health (CARTEEH), a seven university consortium led by Texas A&M University with partner universities of UTEP, Johns Hopkins University, Georgia Institute of Technology, University of California Riverside, Morehouse School of Medicine, and North Dakota State University), UTEP PI: WWL, **U.S. DOT, $10,000,000, (UTEP fund $1,125,000, UTEP matching fund: $562,000 for a total of: $1,687,000 for 5 years).** March 1, 2023 – Feb. 28, 2028.
2. *Quantifying the real impact of transportation activity on regional ozone and near-road PM (PI)*, a joint project with Texas A&M University and Texas Transportation Institute (TTI), **Texas DOT, $537,000, (UTEP fund $105,000).** Sep. 1, 2021 – Aug. 31, 2024
3. *Extended Low-cost $PM_{2.5}$ study in the Paso del Norte*, (PI), **TCEQ, $38,000,** Sep. 1, 2021 – August 31, 2023.
4. *Addressing the FAST act priority research area of Preserving the Environment: Center for Advancing Research* in Transportation Emissions, Energy and Health (CARTEEH), a five university consortium led by Texas A&M University with partner universities of UTEP, Johns Hopkins University, Georgia Institute of Technology and University of California Riverside), UTEP PI: WWL (80%), **U.S. DOT, $7,000,000, (UTEP fund $1,050,000, UTEP matching fund: $525,000 for a total of: $1,577,000 for 5 years).** January 1, 2017 – Dec. 31, 2021.
    a. *Quantification of traffic-related emissions and exposures at U.S.-Mexico Border Crossings using real-time mobile sensors (co-PI: 50%, PI: Mayra Chavez)*, **CARTEEH, $120,000,** Jan. 1, 2021 – September 30, 2022.
    b. *Instant COVID-19 diagnostic devices on the go to improve transportation safety(co-PI: 20%, PI: James Li, Chemistry Depatment)*, **CARTEEH, $112,500,** Jan. 1, 2021 – September 30, 2022.
5. *Addressing the FAST act priority research area of Preserving the Environment: Center for Transportation, Environment, and Community Health (CTECH)* (A five university consortium led by Cornell University with partner universities of UTEP, University of South Florida, and University of California Davis), PI: kelvin Cheu, co-PI: WWL (30%), **U.S. DOT, $7,000,000, (UTEP fund $1,400,000,**

UTEP matching fund: $700,000 for a total of: $2,100,000 for 5 years). January 1, 2017 – Dec. 31, 2021.

a. *Accessing the health and environmental benefits associated with changes in transportation activities in near rosd communities* (PI), **CTECH, $132,198,** October 1, 2020 – May 31, 2022.

COMPLETED RESEARCH PROJECTS

1. *Low-cost air sensor study in the Paso del Norte*, (PI), **UT LJB/TCEQ, $34,300,** May 1, 2020 – August 31, 2021.
2. *Using transit vehicles as probes to monitor community air quality and exposure* (PI), **CTECH, $132,000,** July 1, 2020 – June 30, 2021.
3. *Association of traffic and related air pollutants on cardiorespiratory risk factors from low-income populations in El Paso, Texas*, PI: Soyoung Jeon (NMSU), co-PI: **WWL (50%)**, **$82,500.** Texas A&M Transportation Institute, Nov. 1, 2019 – Sep. 30, 2021.
4. *Assessing Children's spatiotemporal exposures to transportation pollutants in near-road communities*, PI: WWL (100%), **US DOT, $81,000 + UTEP matching fund of $52,000**. May 1, 2018 – Dec. 31, 2019, ORSP #: 226351525A
5. *Evaluation of Air Quality Models with Near-Road Monitoring Data (PI)*, a joint project with Texas A&M Transportation Institute (TTI), **Texas DOT, $382,771, (UTEP fund $110,000).** Nov. 1, 2016 – June 30, 2019
6. *Ozone Reduction at El Paso, Texas (PI)*, **El Paso Metropolitan Planning Organization (MPO), $90,000.** Sep. 1, 2016 – Nov. 30, 2017.
7. Buen Ambiente-Buena Salad: Educational Strategies for Addressing Air Quality on the Border (Co-PI with W. Hargrove of CERM and E. Hampton of Teacher Education). **U.S. EPA, $1,250,000, (UTEP matching fund: $922,000, Total: $2,172,000).** July 1 2011 – Feb. 28, 2017.
8. Rider 8: Ozone Reduction Program at El Paso, Texas (PI). **El Paso MPO, $404,000**. June 1, 2011 – January 31, 2013.
9. Analysis of Targeted Emissions Reduction Possibilities in the Paso del Norte (PI). **Texas Commission on Environmental Quality. $94,938**. September 2012 – August 31, 2013.
10. Air Pollution, System Inflammation, and Sub-Clinical Atherosclerosis in High Altitude Children (Co-PI with Dr. R. Armijos)**, National Institutes of Health**, **$412,249,** Sep. 19, 2009 – July 31, 2011.
11. Air Pollution Reduction at the Bridge of the Americas (PI), ***Border Environment Cooperation Commission,* $ 93,359,** Oct. 1 2009 – June 30, 2011.
12. Characterization of Traffic Air Pollution in Elementary Schools and Its Impact on Asthmatic Children in El Paso, Texas (PI). **Mickey Leland National Urban Air Toxics Research Center, $246,417.** Jan. 16 – Dec. 31, 2010.
13. UTEP-UNM HSC ARCH Program on Border Asthma (Co-Investigator with Drs. N. Pingitore and M.

Amaya)**, National Institutes of Health**, **$5,117,000**, Sep. 1, 2005 – Aug. 31, 2010.

14. Air Quality Characterization at the Mexican Customs Inspection Area at the International Bridge of the Americas (Co-Principal Investigator with H.A. Olvera), **U.S. EPA, $75,846,** July 1, 2008 – Dec. 31, 2010.

15. Air Quality Hazardous Air Pollutant Emission Study (PI), **U.S. EPA/ City of El Paso/Desert Research Institute, $21,716**, Aug. 8, 2008 – Aug. 7, 2010.

16. Effects of Road Pavement on PM Reduction and Potential Health Benefits for U.S.- Mexico Border Cities (PI), **Border Environment Cooperation Commission, $22,287**, July 1 2008 – June 30, 2010.

17. A Binational Pilot Study Examining the Impact of Traffic-Related Air Pollution on Asthmatic Children (Co-Principal Investigator with J. Sarnat (PI) and F. Fernando of Emory University), **Pan American Health Organization, $136,000,** Oct. 1, 2006 – Aug. 31, 2009.

18. Air Quality Modeling at the International Port of Entry in San Luis Rio Colorado, Sonora – San Luis, Arizona (PI), ***Border Environment Cooperation Commission, $4,000,*** July 1 2008 – June 30, 2008.

19. Monitoring of Ambient and In-cabin Air Pollutants at a Truck Stop in El Paso (PI), **Texas Transportation Institute**, **$5,000,** July 1, 2007 – August 31, 2007.

20. A Planning Study to Investigate the Impacts of Dust and Vehicles on Acute Cardiorespiratory Responses in the Arid Southwest (Co-Principal Investigator with J. Lighty of U. of Utah **(PI)**, J. Sarnat of Emory University **(Co-PI)**, and M. Witten of U. of Arizona **(Co-PI)**)**, Health Effects Institute**, **$109,000,** Sep. 1, 2006 – May 31, 2007.

21. Addendum to An Air Impact Study of the Ultraviolet Systems on Reduction of H2S Emissions at the North Wastewater Treatment Plant of Ciudad Juarez, Chihuahua (PI)**, *Border Environment Cooperation Commission, $9,000***, June 2005 – October 2005.

22. An Air Impact Study of the Ultraviolet Systems on Reduction of H2S Emissions at the North Wastewater Treatment Plant of Ciudad Juarez, Chihuahua (PI)**, *Border Environment Cooperation Commission, $14,979***, June 2004 – April, 2005.

23. Investigation of the Nocturnal PM Peaks for Evidence of Association with Population Health Risks in Two Border Cities (PI)**, *U.S. EPA,* $74,995**, June 2005 – Dec. 2006.

24. Indoor Air Pollutants and Inhalation Hazards by Cooking and Heating (PI)**, *U.S. EPA,* $73,573**, June 2004 – Dec. 2005.

25. Search for Gas Phase Chlorinated Compounds Associated with Enhanced Ozone Production in the Paso del Norte Airshed (Co-PI with N. J. Parks), ***U.S. EPA***, **$75,000**, June 1, 2001 – Aug. 31, 2003.

26. Investigations of the Low-Wind Particulate Matter Spikes at the NMED Sunland Park City Yard Monitoring Site (PI)**, New Mexico State University/USEPA, $40,710**, June 2002 – Aug. 2003.

27. Evaluations between Digital Cameras and Other Methods of Air Quality Visualization, TCEQ/UTEP Visibility Camera Contract FY 2003 (Co-PI with N. J. Parks), **Texas Commission of Environmental**

Quality, $79,500, October 31, 2002 – August 31, 2003.

28. Development of a Visualization Tool for Hazardous Releases (PI**), *U.S. Army Research Laboratory, White Sands Missile Range***, **$20,000**, June 2002 – October 2002.
29. Sustainable (Green) Engineering Program (Co-PI with C. Turner), ***NSF MIE project,* $300,000** (student support, equipment, no salary), Sep. 2000 – Aug. 2002.
30. Phase II Study of Paso del Norte PM Characterization (PI), ***U.S. EPA***, **$190,000**, June 2000 – Aug. 2003.
31. Determining the Impacts of Evaporative Cooling Systems on Indoor Air Quality (PI), ***Texas Higher Education Coordinating Board ARP/ATP Programs***, **$115,489**, Jan. 2000 – Aug. 31, 2002.
32. Implementation Phase for Analysis and Web-Site Archiving of Haze and Visibility Images 2000 - 2001: Digital Still, Digital Video, and Digitally Converted, 35 mm Film-Archive Images of the Paso del Norte Airshed (Co-PI with N.J. Parks), ***Texas Natural Resources Conservation Commission***, **$20,000,** July 1, 2000 - June 30, 2001.
33. Method Development for Haze and Visibility Analysis of Web-site Digital Video, Digital Still, and Digitally Converted, 35 mm Film-Archive Images of the Paso del Norte Airshed (Co-PI with N. J. Parks), ***Texas Natural Resources Conservation Commission***, **$20,000,** June 2000 – May 2001.
34. Digital Acquisition and Internet Distribution of Haze Images in the Paso del Norte Airshed (Co-PI with J. Parks), ***Texas Natural Resources Conservation Commission***, **$18,000**, June 1999 – May 2000.
35. An Expert Systems Approach to Managing and Minimizing the Consequences of Accidental Chemical Spills in the U.S.-Mexico Border (PI), ***U.S. EPA***, **$50,000**, Sep. 1998 – Aug. 2000.
36. Characterization of Wind Field for the Paso del Norte Air Quality Basin Using High-Resolution Grids and Data from Multiple Meteorological Monitoring Stations (Co-PI with R. Fitzgerald), ***Center for Environmental Resource Management***, **$81,000**, March 1999 – Aug. 2000.
37. Characterization of Ambient Particulate Matter in the Paso del Norte Region (PI and Technical Director, a joint research program with 4 other universities), ***U.S. EPA,* $750,000,** Sep. 1998 – Dec. 2000.
38. Compilation of Ozone and PM Air Quality Data for the El Paso – Juarez Area (PI), ***UTEP***, **$1,900,** Nov. 1997 – Nov 1998.

PROFESSIONAL MEMBERSHIPS AND AWARDS

Membership

1. Air and Waste Management Association, Meteorology Committee
2. American Society of Civil Engineers
3. American Geophysical Union

4. Member, the U.S. – Mexico Joint Advisory Committee for Border Air Quality
5. Member, American Public Health Association
6. Member, Transportation Research Board
7. Member, Paso del Norte Air Quality Task Force
8. UTEP and UT-HSPH El Paso Public Health Education and Research Collaboration
9. Peer reviewer, Air & Waste Management Association
10. Peer reviewer, Atmospheric Environment
11. Peer reviewer, Journal of Hazardous Materials

Awards and Honors

1. Scholastic Award, National Taiwan University, 1974
2. Outstanding Faculty Achievement Award, College of Engineering, UTEP, 2000.
3. Best Professor Award, Civil Engineering, UTEP, 2003.
4. Panel Reviewer, U.S. EPA PM Research Centers, 2005.

PUBLICATIONS AND PRESENTATIONS *(Names in grey italic indicating research assistants/mentees of W.W. Li)*

Journal Articles and Book Chapters (Peer Reviewed)

1. Raysoni A. and **Li W-W**. 2022. Pulmonary Assessment of a Cohort of Asthmatic School Children due to Air Pollution in a High-Altitude West Texas City of El Paso, J. of Environmental Health (in-review)
2. Eibedingil IG, Gill TE, Van Pelt RS, Tatarko J, Li J, **Li W-W**, 2022. Applying Wind Erosion and Air Dispersion Models to Characterize Dust Hazard to Highway Safety at Lordsburg Playa, New Mexico, USA, *Atmosphere* 2022, 13, 1646. https://doi.org/10.3390/atmos13101646
3. Aguilera J, Jeon S, Raysoni AU, Rangel A, Whigham L, **Li W-W**, 2022. Decreased moderate to vigorous physical activity levels are associated with increased traffic related air pollutants in children with asthma, submitted to the J. of Environmental Health (in-print).
4. Rangel A, Raysoni AU, Chavez M, Jeon S, Aguilera J, Whigham L, Li W-W, 2022, Assessment of Traffic-Related Air Pollution (TRAP) at Two Near-Road Schools and Residence in an Arid, High Altitude West Texan City, *Atmo. Pollution Research 12(2): 101304,* https://doi.org/10.1016/j.apr.2021.101304
5. Vallamsundar S, Uwak I, Jaikumar R. Ramani T, Johnson NM, Aguilera JA, Li W-W, 2021. Personal Exposure to Air Pollution near the US-Mexico Border Crossings: A Case Study of School Teachers in El Paso, TX, submitted to the *Journal of Transport & Health*

6. Aguilera J, Jeon S, Chavez M, Ibarra-Mejia G, Ferreira-Pinto J, Whigham L, **Li W-W**, 2021. Short-term effects of traffic related air pollution on cardiorespiratory outcomes among low income residents from a US-Mexico border community, submitted to the *Journal Air Quality, Atmosphere, and Health*.

7. Aguilera J, Jeon S, Chavez M, Ibarra-Mejia G, Ferreira-Pinto J, Whigham L, **Li W-W**, 2020. Land use regression modeling to assess effects of long-term transportation data on metabolic syndrome risk factors of low-income communities in El Paso, Texas. *Transp Research Record 2675(11): 955-969, 2021.* https://doi.org/10.1177/03611981211021853

8. Chavez MC and **Li, W-W**, 2020. Comparison of Modeled-to-Monitored PM2.5 Exposure Concentrations resulting from transportation emissions in a near-road community, *Transp Res Rec. 2674(12):130–143*. https://doi.org/10.1177/0361198120951189

9. **Li, W-W**, 2020. Chapter 2: Air pollution, air quality, vehicle emissions and environmental regulations, in *Traffic-Related Air Pollution: Emissions, Human Exposures, and Health*, edited by Khreis H. et al, Elsevier S&T Books.

10. Fumador EA, Amaya MA, Brunner B, Clague JW, **Li, W-W**, Olvera HA, Berwick M, Burchiel SW, Pingitore NE, 2019. Cerium levels in coarse and fine airborne particulate matter in El Paso, Texas, USA, *Journal of Atmospheric Pollution*, 7(1):1-13.

11. Hampton E, Ontiveros, C, Canales A, Chavez M, Pina M, Hargrove W, **Li W-W**, Brown S, Simmons B., Lujan J, 2018. Collaborative Creation of an Air Quality Curriculum That Promotes Community-Based Learning, Community Engagement, *High Impact Practice: Internships, Kinder Hunt Publishing Community Engagement and High Impact Practices in Higher Education*, ed. G.M. Nunez and A.L. Gonzalez, Kinder Hunt Publishing Company, Chapter 3, 33-42

12. **Li, W-W**, Pina M, Hargrove W, Hampton E, Lujan J, 2018. Buen Ambiente/Buena Salud: An Internship Program Airmed at Building Capacity to Address Environmental Issues on the U.S. Mexico Border, *High Impact Practice: Internships, Kinder Hunt Publishing Community Engagement and High Impact Practices in Higher Education*, ed. G.M. Nunez and A.L. Gonzalez, Kinder Hunt Publishing Company, Chapter 18, 191-204

13. Paz LM, Amaya MA, Clague JW, **Li W-W**, Olvera HA, Berwick M, Burchiel SW, Pingitore NE, 2017. Airborne lead in El Paso, Texas, USA, *Journal of Atmospheric Pollution*, 5(2):47-54.

14. *Raysoni AU,* Stock TH, Sarnat JA, Chavez MC, Sarnat SE, Montoya T, Holguin F, **Li W-W**, 2017, Evaluation of VOC concentrations in Indoor and Outdoor Microenvironments at Near-Road Schools, *Environmental Pollution*, 231:681-693

15. Raysoni AU, **Li W-W,** Weigel MM, Eschanique P, Racines M, Armijos RX, 2017, Element composition of $PM_{2.5}$ at schools and residences in Quito, Ecuador, *Environmental Pollution*, *International Journal of Environmental Research and Public Health*, 14:674, doi:10.3390/ijerph14070674

16. Raysoni AU, Weigel MM, Montoya T, Racines M, **Li W-W**, 2016, Assessment of indoor and outdoor PM species at schools and residences in three low income neighborhoods of Quito, Ecuador *Environmental Pollution, 214:668-679*

17. Armijos RX, Weigel MM, Myers OB, **Li W-W**, Racines M, Berwick M, Residential exposure to urban traffic is associated with increased carotid intima-media thickness in children, *Journal of Environmental and Public Health*, Volume 2015, Article ID 713540, 11 pages, http://dx.doi.org/10.1155/2015/713540.

18. Charlevoix DJ, Pandya R, Bridger A, Gill TE, Hampton E, Herman R, Knox J**, Li, W-W**, Stanitski D, 2014. New directions for the AMS Symposium on education, *Bulletin of American Meteorological Society, 95(9):* 1465-1467.

19. Raysoni AU, Stock TH, Sarnat JA, Sosa TM, Sarnat SE, Holguin F, Greenwald R, Johnson B, **Li W-W**, 2013. Characterization of traffic-related air pollution metrics at four schools in El Paso, Texas, USA: Implications for exposure assessment and siting schools in urban areas, Jou*rnal of the Atmospheric Environment, 80: 140-151.*

20. Greenwald R, Sarnat J, **Li W-W,** Raysoni AU, Sarnat SE, Johnson BA, Stock TH, Holguin F, Sosa T, 2013, Associations between Source-indicative Pollution Metrics and Increases in Pulmonary Inflammation and Reduced Lung Function in a Panel of Asthmatic Children Texas, *J. of Air Quality, Atmosphere and Health*. 6(2):487-499

21. Zora JE, Sarnat SE, Raysoni AU, Johnson BA, **Li W-W**, Greenwald R, Stock T, Sarnat JA, 2013. Associations between urban air pollution and pediatric asthma control in El Paso, Texas, *Journal of the Science of the Total Environment, 448:56-65.*

22. Olvera HA, Lopez M, Guerrero V, Garcia H, **Li W-W**, 2013. Ultrafine particle levels at an international port of entry between the US and Mexico: Exposure implications for users, workers, and neighbors, *Journal of Exposure Science and Environmental Epidemiology*, 23:289-298

23. Chen LW, Trop R, **Li W-W,** Zhu D, Chow JC, Zielinka B, 2012. Aerosol and air toxics exposure in El Paso, Texas: A pilot study*, Aerosol and Air Quality Research* 12:169-179 (2012)

24. Gonzales M, Myers O, Smith L, Olvera H, Mukerjee S, **Li W-W**, Pingitore N, Amaya M, Burchiel S, Berwick M, 2012. Evaluation of land use regression models for NO2 in El Paso, Texas, USA, *Journal of the Science of the Total Environment 432: 135-142*.

25. Olvera HA, Garcia M, **Li W-W**, Gamez J, Baca DJ, Garcia N, Escajeda S, Lopez M, Perez D, H. Yang, Amaya MA, Meyers O, Burchiel SW, Berwick M, Pingitore NE Jr, 2012. Principal component analysis optimization of a $PM_{2.5}$ land use regression model with small monitoring network, *J. of the Science of the Total Environment, 425: 27-34.*

26. Olvera HA, Perez P, Clague J, Cheng YS, **Li W-W**, Amaya MA, Burchiel SW, Berwick M, Pingitore NE Jr, 2012. The Effect of Ventilation, Age, and Asthmatic Condition on Ultrafine Particle Deposition in Children, Pulmonary Medicine, 2012: 736290, doi:10.1155/2012/736290.

27. Sarnat SE, Raysoni AU, **Li W-W**, Holguin F, Johnson B, Flores S, Garcia JH, Sarnat JA, 2012. Impact of traffic-related air pollution on exhaled nitric oxide in asthmatic children along the US-Mexico border, *Environmental Health Perspectives, 120: 437-440 (2012).*

28. Raysoni A, Sarnat JA, Sarnat SE, Garcia JH, Holguin F, Flores S, **Li W-W**, 2011. Binational school-based monitoring of traffic-related air pollutants in El Paso, Texas (USA) and Ciudad Juárez, Chihuahua (México), *Journal of the Environmental Pollution*, 1*59 (10): 2476-2486.*

29. Lee DW, Zietsman J, Farzaneh M, **Li W-W**, Olvera HA, Storey JM, Kranendonk L, 2009, Investigation of In-Cab Air Quality of Truck at Electrified Truck Stop, *Journal of the Transportation Research Board*, 2123:17-25

30. Staniswalis JG, Yang H, **Li W-W**, Kelly KE, 2009. Using a Continuous Time Lag to Determine the Association Between Ambient PM2.5 Hourly Levels and Daily Mortality: Indication of the Importance of the Total Number of Particles, *J. of AWMA, 59:1173-1185*

31. Lauer FT, Mitchell LA, Bedrick E, McDonald JD, Lee WY, **Li W-W**, Olvera H, Amaya MA, Berwick M, Gonzales M, Currey R, Pingitore NE Jr, Burchiel SW, 2009. Temporal-Spatial Analysis of U.S.-Mexico Border Environmental Fine and Coarse PM Air Sample Extract Activity in Human Bronchial Epithelian Cells, *Toxicology and Applied Pharmacology*, *238(1): 1-10*

32. *Olvera H* and **Li, W-W.** 2008. Effects of plume buoyancy and momentum on the near-wake flow structure and dispersion behind an idealized building, *J. of Industrial Aerodynamics and Wind Engineering 96(2):209-228*.

33. *García JH,* **Li W-W**, Walton J, 2006. Determination of $PM_{2.5}$ sources using time-resolved integrated source and receptor models. *Chemosphere*. *, 65 (11): 2018-2027.*

34. *Raina DS*, Parks NJ, **Li W-W,** Gray RW, Dattner S, 2005. An Innovative Methodology for Analyzing Digital Visibility Images in an Urban Environment. *J. of A&WMA*, *55:1733-1742*.

35. **Li W–W**, *Cardenas N,* Walton J, *Trujillo D, Morales H,* Arimoto R, 2005. PM source identification at Sunland Park, New Mexico using a simple heuristic meteorological and chemical analysis. *J. of A&WMA, 55:352-364*.

36. Rincon CA, Anderson JR, *Bang JJ,* Greenlee JC, Kelly KE, **Li W-W**. 2005. Chapter I: Background and Recent Research on Particulate Matter in the Paso del Norte Border Region, in *The U.S. – Mexican Border Environment: An Integrated Approach to Defining Particulate Matter Issues in the Paso del Norte Region* , ed. R.C. Curry, K. Kelly, H. Meuzelaar, A. Sarofim, San Diego State University Press, San Diego, CA. SCERP Monograph Series 12:1-26.

37. **Li W-W**, *Orquiz R,* Currey RM, *Valenzuela VH*, Meuzelaar HLC, Sheya SA, Sarofim A, Anderson J, Banerji S, Chow J, Watson JG, 2005. Chapter III: Experimental Design, Methods, and Results of Ambient Particulate Matter Characterization in the Paso del Norte Region. in *The U.S. – Mexican Border Environment: An Integrated Approach to Defining Particulate Matter Issues in the Paso del Norte Region* ed. R.C. Curry, K. Kelly, H. Meuzelaar, A. Sarofim, San Diego State University Press, San Diego, CA. SCERP Monograph Series 12:79-112.

38. **Li W-W**, *Bang JJ,* Chianelli RR*,* Yacaman MJ, Orquiz R, 2005. Chapter IV: Characterization of Airborne Particulate Matter in the Paso del Norte (PdN) Air Quality Basin in El Paso-Juarez region: Morphology and Chemistry, in *The U.S. – Mexican Border Environment: An Integrated Approach*

to Defining Particulate Matter Issues in the Paso del Norte Region ed. R.C. Curry, K. Kelly, H. Meuzelaar, A. Sarofim, San Diego State University Press, San Diego, CA. SCERP Monograph Series 12:113-130.

39. Pingitore NE Jr, *Espino T,* Gardea-Torresdey J, Reynoso J, **Li W-W,** Currey R, Moss R, Barnes BE, Machay WP, Zevallos JC, Herrera I, 2005. Chapter V: Toxic Metals in the Air and Soil of the Paso del Norte Region, in *The U.S. – Mexican Border Environment: An Integrated Approach to Defining Particulate Matter Issues in the Paso del Norte Region* ed. R.C. Curry, K. Kelly, H. Meuzelaar, A. Sarofim, San Diego State University Press, San Diego, CA. SCERP Monograph Series 12:131-172.

40. Meuzelaar HLC, Arnold NS, Nookala B, Mejia-Velazquez GM, Medina PO, Ramses-Sanchez J, **Li W-W**, Bang JJ, Fernando HJS, Lee SM, 2005. Chapter VII: Estimating Particulate Matter Exposure Risks and Evaluating Health Effects of Evening Particulate Matter Peaks Using GIS-Referenced Data Fusion Methods: A Pilot Study, in *The U.S. – Mexican Border Environment: An Integrated Approach to Defining Particulate Matter Issues in the Paso del Norte Region* ed. R.C. Curry, K. Kelly, H. Meuzelaar, A. Sarofim, San Diego State University Press, San Diego, CA. SCERP Monograph Series 12:235-304.

41. *Garcia JH*, **Li W-W**, Walton J, Arimoto R, Schloeesslin C, Sage S, Okrasinski R, Greenlee J, 2004. Characterization and implication of potential fugitive dust sources in the Paso del Norte region, *Jl. Science of the Total Environment, 325:95-112.*

42. Paschold H, **Li W-W**, *Morale H*, Walton JW. 2003. Laboratory study of the impacts of evaporative cooler on PM concentrations, *Jl. of Atmospheric Environment, 37:1075-1086*

43. **Li W-W,** *Paschold H, Morale H,* Chianelli R, 2003. Correlations between short-term indoor and outdoor PM concentrations at residences with evaporative coolers. *Jl. of Atmospheric Environment, 37:2691-2703*

44. Paschold H, **Li W-W**, *Morale H,* Pingitore NE, Maciejewska B, 2003. Elemental analysis of airborne particulate matter and cooling water in West Texas Residences, *Jl. of Atmospheric Environment, 37: 2681-2690*

45. *Arrieta DE*, Ontiveros CC, **Li W-W**, *Garcia JH*, Jacob MS, McDonald D, Burchiel SW, Washburn, BS, 2003. Aryl hydrocarbon receptor-mediated activity of particulate organic matter from the Paso del Norte airshed along the U.S.-Mexico border*, Jl. of Environmental Health Perspectives, 111(10):1299-1305*.

46. Parks N J, **Li W-W**, Turner CD, Gray RW, Currey R, Dattner S, Saenz J, *Valenzuela V,* VanDerslice JA, 2002. Chapter 3: Air Quality in the Paso del Norte Airshed: Historical and Contemporary. *Air Quality on the U.S.-Mexico Border.*

47. **Li W-W**, *Orquiz R,* Pingitore NE Jr, Garcia JH, Espino TT, Gardea-Torresdey J, Chow J, Watson JW, 2001. Analysis of temporal and spatial dichotomous PM air samples in the El Paso-Cd. Juarez air quality basin. *J. of A&WMA 51: 1511-1560*.

48. McFarland AR, Ortiz CA, Cermak JE, Peterka JA, **Li W-W,** 1990. Wind tunnel evaluation of a rotating-element large-particle sampler, *Aerosol Science and Technology, Vol. 12, No. 2, p 422-430.*

49. **Li W-W** and Meroney RN, 1985. Re-examination of Eulerian-Lagrangian turbulence relationship. *Jl. of Atmospheric Environment* 19:853-855.

50. **Li W-W** and Meroney RN, 1984. Estimation of Lagrangian time scale from laboratory measurements of lateral dispersion. *Jl. of Atmospheric Environment* 18:1601-1611.

51. **Li W-W** and Meroney RN, 1983. Gas dispersion near a cubical model building, Part I: Mean concentration measurements. *Jl. of Wind Engineering and Industrial Aerodynamics* 12:15-33.

52. **Li W-W** and Meroney RN, 1983. Gas dispersion near a cubical model building, Part II: Concentration fluctuation measurements. *Jl. of Wind Engineering and Industrial Aerodynamics* 12:35-47.

Technical Reports (Peer Reviewed)

1. Chavez M, Vazquez L, Hernandez Y, Toguinto F, Williams E, Vazquez FA, **Li W-W**, 2021. Low-cost Air Sensor Study in the Paso del Norte, Texas Commission on Environmental Quality, 53 pp

2. Chavez M, Williams E, Cheu K, **Li W-W**, 2021. Using transit vehicles as probes to monitor community air quality and exposure, Center for Transportation, Environment, and Community Health (CTECH), U.S. DOT Tier 1 UTC, 98 pp.

3. Jeon S, Aguilera JA, Whigham L, Chavez MC, **Li W-W.** 2020. Association of traffic and related air polltants on cardiorespiratory risk factors fro low-income populations in El Paso, TX, Center for Advancing Research in Transportation Emissions, Energy, and Health (CAR-TEEH), U.S. DOT Tier 1 UTC, 171pp, Association of Traffic and Related Air Pollutants on Cardiorespiratory Risk Factors From Low-Income Populations in El Paso, TX (bts.gov)

4. **Li W-W**, Raysoni AU, Jeon S, Whigham L, Aguilera JA, Rangel A, Chavez MC, Ramirez IM, 2020. Healthy Living, Children's Respiratory Health, and Traffic-Related Air Pollution in an Underserved Community, Center for Advancing Research in Transportation Emissions, Energy, and Health (CAR-TEEH), U.S. DOT Tier 1 UTC, 245pp, Healthy Living, Children's Respiratory Health, and Traffic-Related Air Pollution in an Underserved Community (bts.gov)

5. **Li W-W**, Chavez MC, Ramirez IM, Cheu KR, 2020. Assessing children's spatiotemporal exposures to transportation pollutants in near-road communities, Center for Transportation Emissions, Environment, and Community Health (CTECH), U.S. DOT Tier 1 UTC, 195pp https://hdl.handle.net/1813/69795

6. Farzaneh R, Vallamsundar S, Jaikumar R, Venugopal M, Askariyeh M, Johnson J, **Li, W-W**, Chavez MC, Ramirez IR, 2019. Evaluation of air models with near-road monitoing data: Technical report 0-6943-R1, Texas Department of Transportation, 172 pp.

7. Hargrove WL, Hampton E, **Li WW**. Buen Ambiente-Buena Salud: Educational Strategies for Addressing Air Quality on the Border. 2017. A project final report submitted to the U.S. EPA

Office of Air and Radiation. January 2017.

8. **Li, W.-W**., Rangel, A., Chavez, M., 2017. Evaluation of ozone control strategies for El Paso, A project report prepared for the El Paso Metropolitan Planning Organization, El Paso, TX. Nov. 30, 2017, 82 pages.

9. **Li WW**, Sarnat JA, Raysoni AU, Sarnat SE, Stock TH, Holguin F, Greenwald R, Olvera HA, Johnson BA, 2011. Characterization of traffic related air pollution in elementary schools and its impact on asthmatic children in El Paso, Texas. 2010. *Mickey Leland National Urban Air Toxic Research Center*, ***NUATRC Report Number 20***, Houston, Texas. June 2011. 246 pages.

10. Sarnat JA, Holguin F, **Li W-W**, Sarnat SE, Flores S, 2010. A binational pilot study examining the impact of traffic-related air pollution on asthmatic children, prepared for the Pan American Health Organization, Washington, DC. August 2011, 349 pages.

11. U.S. Environmental Protection Agency (**Li W-W**, co-principal author). 1997. *Risk assessment for the Waste Technologies Industries (WTI) hazardous waste incineration facility (East Liverpool, Ohio). Volume VII: Accident analysis: selection and assessment of potential release scenarios*, EPA-905-R97-002g, May 1997.

12. U.S. Environmental Protection Agency (**Li W-W**, co-principal author). 1997. *Risk assessment for the Waste Technologies Industries (WTI) hazardous waste incineration facility (East Liverpool, Ohio). Volume VIII: Additional Analysis in Response to Peer Review Recommendations*, EPA-905-R97-002h, May 1997.

13. **Li W-W,** 1992. *Emissions from contaminated soil* (p. A-9 to A-12)*,* in the *Air/Superfund National Technical Guidance Study Series – Assessing potential indoor air impacts for Superfund sites*. U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, EPA-451/R-92-002, September 1992.

14. **Li W-W** and Meroney RN, 1984. *The estimation of turbulent diffusion from real time anemometer statistics.* CED83-84WWL12, and Report NUREG/CR-4072, U.S. Nuclear Regulatory Commission, Washington, D.C.

15. **Li W-W**, Meroney RN, Peterka JA, 1981. *Wind-tunnel Study of Gas Dispersion near a Cubical Model Building.* NRC Report NUREG/CR-2395, U.S. Nuclear Regulatory Commission, NTIS, Washington, D.C.

Conference Papers (Peer Reviewed)

1. **Li W-W,** Chavez M, Williams E, Vazquez L, 2022. Quantification of Traffic-related Air Pollution at a U.S.-Mexico Border Crossing, accepted for a presention at the 2023 annual Transportation Research Board (TRB) meeting in Washington, D.C, 2022.

2. Chavez M, Williams E, Vazquez L**, Li W-W**, 2022. Evaluation of Near-road Exposure 1 Using On-road Air Monitor, presented at the 2022 annual Transportation Research Board (TRB) meeting in Washington, D.C, 2022.

3. Raysoni A, **W.W. Li**, 2021. Elemental Analysis of PM2.5 at four schools in El Paso, TX, USA, presented at the AGU Fall Meeting 2021, New Orlean, LA.

4. Chavez M and **Li W-W**, 2020. Measurements of Traffic-Related Air Pollution at Two Near-road Locations, presented at the 2021 annual Transportation Research Board (TRB) meeting in Washington, D.C

5. Aguilera J, Jeon S, Chavez M, Ibarra-Mejia G, Whigham L, **Li W-W**, 2020. Land Use Regression of Long-Term Transportation Data on Metabolic Syndrome Risk Factors in Low-income Communities presented at the 2021 annual Transportation Research Board (TRB) meeting in Washington, D.C. (webinar)

6. **Li W-W** and Chavez M, 2020. Implications from upwind-downwind monitoring of traffic-related air pollutants at a busy highway in El Paso, Texas, accepted as a platform presentation at A&WMA's 113th Annual Conference and Exhibition, June 29-July 2, 2020, San Francisco, CA

7. **Li W-W**, Jeon S, Chavez M, Ramirez I, Rangel A, Urbina A, Vallamsundar S, Farzaneh, R, 2019. Determination of background PM2.5 concentrations for a potential transportation project site. Presented and published at 2019 TRB annual meeting, Washington DC, Jan 13-17, 2019. TRB Paper No. 19-02174R

8. **Li W-W**, Chavez M, Jeon S, Ramirez I, Rangel A, Urbina A, Vallamsundar S, Farzaneh, R, 2019. Contribution of traffic emissions to near-road PM2.5 air concentrations as implied by urban-scale background monitoring. Presented and published at 2019 TRB annual meeting, Washington DC, Jan 13-17, 2019. TRB Paper No. 19-01459R1

9. Aquilera J., Jeon S, Raysoni A, Rangel A, Whigham L, **Li W-W**, 2019. Moderate to vigorous physical activity levels negatively correlate with traffic related air pollutants in children with asthma attending a school near a highway. Presented and published at 2019 TRB annual meeting, Washington DC, Jan 13-17, 2019. TRB Paper No. 19-01943

10. Uwak I, Aguilera J, Ramirez I, Johnson N, Whigham L, **Li W-W**, Ramani T, Vallamsundar S, 2019. Exposure assessment of Traffic-Related Air Pollution in El Paso, Texas using personal and ambient monitoring, presented and published in the 2019 TRB Annual Meeting, Washington, D.C.

11. Vallamsundar S, Askariyeh M, Farzaneh R, Venugopal M, **Li, W-W**, 2019. Near-road monitoring data assessment: Impact of traffic, meteorology and background concentration, Presented and published at 2019 TRB annual meeting, Washington DC, Jan 13-17, 2019.

12. **Li W-W** and Raysoni A, 2014, Measurements of Traffic-related Indoor-Outdoor Air Pollution at Elementary Schools in a Cross-border Urbanized Metroplex, presented in Indoor Air 2014: the 13th International Conference on Indoor Air Quality and Climate, Hong Kong, July 7-12, 2014.

13. Yang HY, **Li W-W**, Valenzuela V., 2014. Development of a Principal Component Regression Model for Predicting Ozone Exceedance, presented at *the 107th Air and Waste Management Association Conference and Exhibition,* Long Beach, CA, June 24-28, 2014.

14. **Li W-W,** Hampton E, Hargrove W, Pina M, Gill T, 2014, Implementation of Border-land Air Quality Education and Training Strategies, , accepted for a presentation at *the 107th Air and Waste Management Association Conference and Exhibition,* Loang Beach, CA, June 24-28, 2014.

15. Sosa T, Yang H, Cheu RL, Pinal G, Valenzuela V, Romo A, **Li W-W**, 2013. A Methodology for Generating Emission Factors at an International Port of Entry, Paper #12792, Proceedings of *the 106th Air and Waste Management Association Conference and Exhibition,* Chicago, IL, June 25-28, 2013.

16. Sosa TM and **Li W-W,** 2012. A GIS-based modeling approach for estimating pollutant concentrations in an urban environment, Paper #561. *Proceedings of the 105th Air and Waste Management Association Conference and Exhibition,* San Antonio, TX, June 19-22, 2012

17. **Li W-W,** Hampton E, Hargrove W, 2012. Educational strategies for addressing air quality on the border, Paper #544. *Proceedings of the 105th Air and Waste Management Association Conference and Exhibition,* San Antonio, TX, June 19-22, 2012.

18. Sosa TM, Cheu RL, Ramirez A, **Li W-W,** 2012. Air pollution reduction at the Bridge of the Americas, Paper #560. *Proceedings of the 105th Air and Waste Management Association Conference and Exhibition,* San Antonio, TX, June 19-22, 2012

19. Valenzuela V, Yang HL, Pinal GH, Fitzgerald R, Yang HY, Olvera H, **Li W-W,** 2012. Conceptual model of ozone pollution for an air quality basin in Texas, Paper #538. *Proceedings of the 105th Air and Waste Management Association Conference and Exhibition,* San Antonio, TX, June 19-22, 2012.

20. Tropp RJ, Chen L, Zhu D, Chow JC, Watson JG, Zielinska B, **Li W-W**, 2010. Air Toxics in El Paso, Texas. *Proceedings of the A&WMA's 103rd Annual Conference and Exhibition*, June 22-25, 2010, Calgary, Alberta, Canada

21. Raysoni A, **Li W-W**, Sarnat SE, Sarnat JA, Holguin F, Garcia J, Flores S, 2009. Intra-urban spatial variation of $PM_{2.5}$ mass measurements, filter absorbance measurements and NO_2 at El Paso, Texas, USA & Cd. Juarez, Chihuahua, MX, *Proceedings of the A&WMA's 102nd Annual Conference and Exhibition*, June 16-19, Detroit, MI

22. **Li W-W,** Molina E, Holguin F, Flores S, 2009. Interdependence of traffic-related air pollution on meteorology and geography in a bi-national air quality basin, *Proceedings of the A&WMA's 102nd Annual Conference and Exhibition,* June 16-19, Detroit, MI

23. Gamez J, Mares J, **Li W-W**, 2009. Assessment of Impacts on Emissions and Air Pollution Reduction at the New Port or Entry in San Luis Rio Colorado, Sonora, *Proceedings of the A&WMA's 102nd Annual Conference and Exhibition*, June 16-19, Detroit, MI.

24. Astorga F and **Li W-W**, 2009. Correlation of Bio-monitoring Passive and Active Monitoring of Total Suspended Particles (TSP) in Chihuahua, Mexico, *Proceedings of the A&WMA's 102nd Annual Conference and Exhibition,* June 16-19, Detroit, MI.

25. Olvera HA and **Li W-W**, 2009, Characterization Of Ultrafine Particles And Benzene Concentrations At The International Bridge Of The Americas, *Proceedings of the A&WMA's 102nd Annual Conference and Exhibition,* June 16-19, Detroit, MI.

26. Chen L-W, Tropp R, Zhu D, **Li W-W**, 2009. Air Toxics and Aerosol Concentration at El Paso, Texas: Implementation for Cross-Border Transport, AAAR 2009 Annual Conference, Minneapolis, MN, Oct. 26-30, 2009

27. Lee DW, Zietsman J, Farzaneh M, **Li W-W**, Olvera HA, Storey JM, Kranendonk L, 2008*. Investigations of in-cab air quality of a truck resting in an electrified truck stop. TRB 2009 Annual Conference,* Washington, D.C*.*

28. *Raina DS*, Parks NJ, **Li W-W**, Gray RW, Dattner S, 2004. Innovative monitoring of visibility using digital imaging technology in an arid urban environment. *Proceedings of the Regional and Global Perspectives on Haze: Causes, Consequences and Controversies*, Oct. 26-29, 2004, Asheville, North Carolina*.* 19 pages.

29. Turner C D, **Li W-W,** Flores B, 2002. Using a green engineering building design contest to promote sustainable engineering. *Proceedings of the 2002 ASEE Annual Conference.*

30. Parks NJ, **Li W-W**, *Borlepwa V*, Gray RW, Dattner S, Valenzuela V, 2001. Variation of visual air quality in the Paso del Norte airshed. *Proceedings of the 94th AW&MA Annual Meeting and Exhibition*, Orlando, Florida*.* 15 pages.

31. Turner CD and **Li W-W,** 2001. Developing sustainable engineering across a college of engineering. *Proceedings of the 2001 ASEE Annual Conference,* Albuquerque, New Mexico. 8 pages.

32. West KA, Kirschner SW, **Li W-W,** 2001. Novel approach to the use of geologic and soil-gas sampling data in risk assessment - A case study using an advective-diffusive emission model. Presented in *the Geological Society of America Annual Meeting & Exposition - 2001*, November 5 - 8, 2001, Boston, Massachusetts

33. *Orquiz R,* **Li W-W**, Pingitore NE, 2000. Temporal measurements of PM fine and coarse concentrations in El Paso. *Proceedings of the 93rd AW&MA Annual Meeting and Exhibition*, Salt Lake City, Utah, June 18-22. Paper #. 00-745, 20 pages.

34. Sheya SAN, Meuzelaar HLC, **Li W-W,** 2000. Novel analytical dimensions in exploratory field studies of air particulate matter. *Proceedings of the 93rd AW&MA Annual Meeting and Exhibition*, Salt Lake City, Utah, June 18-22. Paper #. 00-669, 11 pages.

35. **Li W-W**, *Orquiz R,* Pingitore NE, Espino TT, Gardea-Torresdey J, Chow JC, Watson JG, 2000. Analysis of temporal dichotomous PM air samples in the PdN region. Paper presented at *the Tropospheric Aerosols: Science and Decisions in an International Community*, A NARTRO Technical Symposium on Aerosol Science, Queretaro, Mexico, Oct. 23-27. 2000. 27 pages.

36. **Li W-W,** 1999. Characterization of ambient PM concentrations in the Paso del Norte region. *Proceedings of the 92nd AW&MA Annual Meeting and Exhibition*, St. Louis, MO, June 20-24. Paper #. 99-192, 18 pages.

37. **Li W-W,** 1999. A refined consequence analysis of spill events at a chemical distribution facility. *Proceedings of the 92nd AW&MA Annual Meeting and Exhibition*, St. Louis, MO, June 20-24. Paper #. 99-102, 13 pages.

38. **Li W-W**, Greenhalgh ME, Washburn ST, 1994. Implementation of a risk-based air monitoring program using integrated and continuous air monitors. *Proceedings of the 1994 EPA/A&WMA International Symposium on Measurement of Toxic and Related Air Pollutants*, p. 741-751.

39. **Li W-W** and Long M, 1993. Evaluating the impact of subsurface contaminants on indoor air quality using field measurements and estimates from a convective-diffusive transport model. *Proceeding of the 1993 EPA/A&WMA International Symposium on Measurement of Toxic and Related Air Pollutants*. p. 41-51.

40. **Li W-W**, Firth MJ, Harris RH, 1992, Health risk reduction based on Monte Carlo simulation and air dispersion modeling at a chemical processing facility. In *Proceedings of the 85th Annual Meeting & Exhibition of the Air and Waste Management Association*, Kansas City, Missouri, June 21-24. Paper #. 92-149.03, 18 pages.

41. Washburn ST and **Li W-W,** 1992. Risk assessment under 1990 New Clean Air Act Amendments. In *Proceedings of the First National Symposium on Permitting Under the Clean Air Act Amendments: Technologies at Work*, Washington, D.C., April. 21 pages

42. **Li W-W**, Kleiman CF, Firth MJ, Baviello MA, Highland JH, 1991. An expert systems approach to screening environmental data at contaminated sites. *Proceedings of the 84th Annual Meeting of the Air & Waste Management Association*, Vancouver, British Columbia, June 16-21. Paper #. 91-119.11, 20 pages.

43. **Li W-W**, Scott MP, Bradstreet JW, 1990. Modeling of On-site Air Concentrations at Superfund Sites. *Superfund 90,* p. 117-122.

44. **Li W-W,** 1990. Estimation of air emissions utilizing indirect on-site emission measurements. *Proceedings of the 83rd Annual Meeting of the Air & Water Management Association*, Pittsburg, PA, June 24-29. Paper #. 90-82.3, 18 pages.

45. **Li W-W** and Meroney RN, 1985. Measurements of the two-point Eulerian velocity statistics in a turbulent boundary layer. In *Proceedings of the Seventh Symposium on Turbulence and Diffusion*, American Meteorology Society, Boulder, Colo., November.

Selected Conference/Meeting Papers and Presentations

1. **Li W-W,** Williams E, Vazquez L, Chavez M , 2022. Monitoring of three criteria air pollutants at an international port of entry, submitted for a presentation at the 2022 National Ambient Air Monitoring Conference, Pittsburgh, PA, August 22-25, 2022

2. Chavez M, Vazquez L, Hernandez Y, Toquinto F, Williams E, Vazquez A, **Li W-W**, 2022. Low-cost PM2.5 measurements in a binational metropolitan area along the U.S.-Mexico border, presented at the Air Sensors International Conference, May 11-13, 2022.

3. Williams E, Vazquez L, Chavez M, **Li W-W**, 2022. Rapid Assessment of Community Air Quality Using Real-time Mobile Air Monitors, presented at the Air Sensors International Conference, May 11-13, 2022.

4. Chavez M and **Li W-W**, 2021. Project overview, sensor calibration, and quality assurance, Technical Exchange on Air Sensor Networks Along the Mexico-U.S. Border, sponsored by the U.S. EPA, Office of Air Quality Planning and Standards June 9, 2021. (webinar)

5. Chavez M, **Li W-W**, 2021. Modeling spatiotemporal exposures to traffic-related air pollutants in a near-highway microenvironment, Transportation, Air Quality, and Health (TAQH2021) symposium, May 18, 2021. (virtual symposium)

6. Chavez M, Li W-W, 2021. Low-cost sensor study in the Paso del Norte, discussion on PM2.5 air sensors and correction factors, U.S. EPA, Office of Air Quality Planning and Standards, March 22, 2021 (virtual meeting)

7. Chavez M, Li W-W, 2021. Low-cost sensor study in the Paso del Norte, presented in the 79th meeting of Joint Advisory Committee (JAC) for the Improvement of Air Quality in the Ciudad Juárez, Chihuahua / El Paso, Texas / Doña Ana County, New México Air Basin, Feb. 11, 2021 (virtual meeting)

8. **Li W-W**, 2020. Exposures to COVID-19 in a small transportation environment, COVID-19 impacts on Transportation, Air Quality, and Health, Center for Advancing Research in Transportation Emissions, Energy, and Health, A USDOT University Transportation Center, Dec. 3, 2020, (Webinar, invited speaker)

9. Aguilera J, Jeon S, Chavez M, Ibarra G, Ferreira-Pinto J, **Li W-W**, Whigham L, 2020. Associations of Traffic and Air Pollution with Obesity and Fasting Glucose in Low-Income Populations, Obesity Week: The Obesity Society, Atlanta, Georgia, Nov. 3-6, 2020. (virtual symposium)

10. Vallamsundar S, Asityskariyeh M, Farzaneh R, Venugopal M, **Li, W-W**, 2020, Assessment of Personal Exposure to Air Pollution in the Vicinity of US-Mexico Border Crossings: A Case Study in El Paso, TX, presented at the 2nd Transportation, Air Quality, and Health Symposium, Riverside, CA, May 16-18, 2020. (virtual symposium)

11. Aguilera J, Jeon, S, Chavez M, Ibarra G, Ferreira-Pinto J, Whigham L, **Li W-W**, 2020. Short-term associations of traffic-related air pollutants on cardiorespiratory risk factors from low-income populations in El Paso, Texas, presented at the 2nd Transportation, Air Quality, and Health Symposium, Riverside, CA, May 16-18, 2020. (virtual symposium)

12. Raysoni, A, Sarnat J, Chavez M, Parsons J, **Li W-W**, 2020. Elemental Analysis of PM2.5 at four schools in El Paso, TX,USA and Ciudad Juarez, Chihuahua, MX., presented at the 2nd Transportation, Air Quality, and Health Symposium, Riverside, CA, May 16-18, 2020. (virtual symposium)

13. Chavez M and **Li W-W**, 2020. Modeling spatiotemporal exposures to traffic-related air pollutants in a near-highway microenvironment, presented at the 2nd Transportation, Air Quality, and Health Symposium, Riverside, CA, May 16-18, 2020. (virtual symposium)
14. Uwak I, Aguilera J, Ramirez I, Johnson N, Whigham L, **Li W-W**, Ramani T, Vallamsundar S, 2019. Exposure assessment of Traffic-Related Air Pollution in El Paso, Texas using personal and ambient monitoring, presented in the TRB Annual Meeting, Washington, D.C.

15. **Li W-W**, Jeon S, Raysoni A, Aguilera J, Whigham L, 2019. Near-highway criteria pollutant concentrations are weakly associated with adverse respiratory symptoms for asthmatic children attending road-side schools, presented in the Transportation, Air Quality, and Health Symposium, Austin, Texas, Feb. 18-20, 2019.

16. **Li W-W**, Chavez M, Jeon S, Ramirez I, 2019. the contribution of traffic emissions to near-road $PM_{2.5}$ pollution using concentrations observed at near-road and urban-scale background air monitors, presented in the Transportation, Air Quality, and Health Symposium, Austin, Texas, Feb. 18-20, 2019.

17. Raysoni, AU, Jeon S, Aguilera J, **Li W-W**, 2019. Assessment of Asthma Control Questionnaire (ACQ) as a metric for children's traffic air pollution exposures at two roadside El Paso elementary schools, presented in the Transportation, Air Quality, and Health Symposium, Austin, Texas, Feb. 18-20, 2019

18. Vallamsundar S, Askariyeh M, Farzaneh R, Venugopal M, **Li, W-W**, 2019. Near-road monitoring data assessment: Impact of traffic, meteorology, and background concentration, presented in the Transportation, Air Quality, and Health Symposium, Austin, Texas, Feb. 18-20, 2019

19. Jeon S, Staniswalis, JG, Raysoni A, **Li, W-W**, 2019. Determination of the optimal sample size for a limited longitudinal cohort study of children's respiratory health and air quality, presented in the Transportation, Air Quality, and Health Symposium, Austin, Texas, Feb. 18-20, 2019

20. Aguilera J, Perez D, Redelfs A, Jeon S, Raysoni A, **Li, W-W**, Whigham L, 2019. Relationship between physical activities, fruits and vegetables, and air quality in children with asthma, presented in the Transportation, Air Quality, and Health Symposium, Austin, Texas, Feb. 18-20, 2019

21. Chavez, M and **Li, W-W**, 2018. Assessing spatiotemporal exposures to transportation pollutants in near-road communities using AERMOD. Center for Transportation, Environment and Community Health Annual Meeting, Davis, CA, Nov. 9, 2018.

22. **Li W-W,** Jeon S, Raysoni A, Aguilera J, Whigham L, Rangel A, Chavez M, Ramirez I, 2018. Association of respiratory responses with traffic air pollution for asthmatic children attending road schools, presented in the Air Sensor International Conference, Oakland, CA. Sep 12-14, 2018.

23. Aguilera J, Jeon S, Chavez M, Whigham L, **Li, W-W**, 2018. Moderate to vigorous physical activity levels negatively correlate with traffic related air pollutants in children with asthma attending a school near a freeway. presented in the 73rd meeting of the Joint Advisory Committee for the Improvement of Air Quality in the Cd. Juarez, Chihuahua, El Paso, Texas, and Dona Anna County, New Mexico Air Basin, Las Cruces, NM, Sep 20, 2018.

24. Amit U. Raysoni, Juan A. Aguilera, Leah D. Whigham, Stephanie Garcia, Moises Garcia, Adan Rangel, Mayra C. Chavez, Ivan M. Ramirez, **Wen-Whai Li**, 2018. Airway inflammation and lung function measurements in asthmatic children at two road-side elementary schools in El Paso, TX. Presented

at the American Public Health Association 2018 Annual Meeting and Expo, Nov. 10-14, 2018, San Diego, CA.

25. **Li W-W**, 2017. U.S. DOT Center for Advancing Research in Transportation Emission, Energy, and Health (CAR_TEEH): Research Activities in El Paso, presented in the 69th meeting of Joint Advisory Committee (JAC) for the Improvement of Air Quality in the Ciudad Juárez, Chihuahua / El Paso, Texas / Doña Ana County, New México Air Basin, El Paso, Texas, May 25, 2017

26. Hargrove WL, Hampton E, **Li W-W**, 2016. Buen Ambiente-Buena Salud: An Education-Based Program for Addressing Air Quality on the USA-Mexico Border, presented to U.S. EPA Office of Air and Radiation, Jan 6-10, 2013. Austin, Texas.

27. Hampton E, **Li W-W,** Gill T, Hargrove W, 2013. Buen Ambiente-Buena Salud: An Education-Based Program for Addressing Air Quality in a USA-Mexico Border Metroplex, presented at the 93rd American Meteorological Society Annual Meeting, Oct. 11, 2013. Washington, D.C.

28. Armijos R, Weigel M, Pingitore NE, **Li W-W**, Myers O, Berwick M, Racines-Orbe M, 2012. Urban air pollution, systemic inflammation, and sub-clinical atherosclerosis in Eduadorian children, presented in the American Public Health Association 140th Annual Meeting & Expo, Oct. 27-31, 2012. San Francisco, CA.

29. Yang H, González-Ayala S, Tarin G, **Li W-W**, Valenzuela V, Pinal G, 2012, Development of MOVES-Mexico Stage I: Ciudad Juarez Chihuahua and the Quantification of Uncertainties, presented in the 20th International Emission Inventory Conference - "Emission Inventories - Meeting the Challenges Posed by Emerging Global, National, and Regional and Local Air Quality Issues", Tampa, Florida, August 13 - 16, 2012

30. **Li W-W**, Sosa TM, Cheu RL, Ramirez A, 2012. Evaluation of Transportation Mitigation Measures on Air Quality and Traffic Congestion at the Bridge of the Americas Port of Entry, presented in the Health Impacts of Border Crossings Conference 2012, May 2-4, 2012, San Ysidro, CA.

31. **Li W-W**,Yang HY, Pinal G, Valenzuela V, Olvera H, Cheu RL, Fitzgerald R, Yang HL, 2012. Development of Emission Inventory Improvements and Control Strategies for Ozone Reduction in El Paso, Texas. Presented in the 53rd Meeting of the Joint Advisory Committee for the Improvement of Air Quality in the Ciudad Juárez, Chihuahua / El Paso, Texas / Doña Ana County, New México Air Basin, Jan. 26, 2012. El Paso, Texas.

32. **Li W-W,** Pinal G, Valenzuela V, Yang HY, Olvera H, Cheu RL, Fitzgerald R, Yang HL, 2011. Conceptual Model for Ozone Reduction in El Paso, Texas. Presented in the 52nd Meeting of the Joint Advisory Committee for the Improvement of Air Quality in the Ciudad Juárez, Chihuahua / El Paso, Texas /Doña Ana County, New México Air Basin, Oct. 27, 2011. Sunland Park, NM.

33. Stock TH, **Li W-W,** Sarnat JA, Raysoni AU, Olvera HA, Sarnat SE, Holguin F, 2011. The Impact of Traffic-Related Air Pollutants on Indoor Air Quality at Four Elementary Schools in El Paso, Texas with Different Air Conditioning Systems, presented in the 12th International Conference on Indoor Air Quality and Climate, June 5-10, Austin, Texas.

34. Sosa T and **Li W-W**, 2011. Development of a Land Use Regression Model to Predict Nitrogen Dioxide Concentrations., presented in the Emerging Researchers National Conference in STEM, Feb. 23-26, 2011, Washington, D.C.

35. Kaden D, Hendler EE, Bruhl R, **Li W-W**, Sarnat S, Olaguer E, Guven B, Zielinska B, Fujita E, Beskid C, 2011. Science to Address Texans' Health, presented at The Society of Toxicology 50th Annual Meeting, March 6-10, 2011, Washington, D.C.

36. Olvera HA, Perez D, Clague JW, **Li W-W**, Cheng YS, Pingitore N, 2010. Size-Resolved Measurements of Polydispersed Hygroscopic Ultrafine Particle Deposition in the Respiratory Tract of Children, presented at *the AAAR 29th Annual Conference,* March 22-26, Portland, OR

37. **Li W-W**, *Raysoni AU, Sarnat JA, Stock TH, Sarnat SE, Holguin F, Greenwald R, Olvera HA, Johnson BA,* 2010. Indoor-outdoor measurements of Traffic Related Air Pollutants in four elementary schools in El Paso, Texas, invited to present in the Coordinated Research Council Mobile Source Air Toxics Workshop, Nov. 30 – Dec. 2, 2010, Sacramento, CA

38. **Li W-W**, Sarnat SE, Raysoni AU, Olvera HA, Sarnat JA, Greenwald R, Johnson B, Stock TH, Holguin F, 2010. Characterization of Traffic Related Air Pollution in Elementary Schools and Its Impact on Asthmatic Children in El Paso, Texas, invited to present in the Credible Science to Address Texans' Health: Exposure to Air Toxics, A Mickey Leland National Urban Air Toxics Research Center 2010 Symposium, Nov. 16, 2010, Dallas.

39. Tropp R, Chen L, Zue D, Chow J, Watson J, Zielinska B, **Li W-W**, 2010. An air toxic study in El Paso: Measurement quality and potencial health risks. Symposium on air quality measurement methods and technology, Los Angeles, CA, November 2 – 4, 2010.

40. Olvera HA, Guerrero V, Lopez M, **Li W-W**, 2010. Diurnal and seasonal variations of traffic-related PM pollution at an International border crossing, presented at *the 2010 AAAR/HEI Specialty Conference: Air Pollution and Health – Bridging the Gap from Sources to Health Outcomes*, San Diego, CA, March 22 – 26, 2010.

41. Raysoni A, **Li W-W**, Sarnat S, Holguin F, Garcia J, Flores S, Sarnat JA, 2010. Investigation of children's exposure concentrations at near-highway elementary schools in a U.S.-Mexico border community, accepted for a presentation at *the 2010 AAAR/HEI Specialty Conference: Air Pollution and Health – Bridging the Gap from Sources to Health Outcomes*, San Diego, CA, March 22 – 26, 2010.

42. Sarnat SE, Raysoni A, **Li W-W**, Holguin F, Johnson B, Flores S, Garcia J, Sarnat JA, 2010. Associations between air pollution and exhaled nitric oxide in asthmatic children along the US-Mexico border region, accepted for a presentation at *the 2010 AAAR/HEI Specialty Conference: Air Pollution and Health – Bridging the Gap from Sources to Health Outcomes*, San Diego, CA, March 22 – 26, 2010.

43. Chen LW, Tropp R, Zhu D, **Li W-W,** Rodriguez E, 2009. Air toxics in El Paso Texas: Implications for Cross-Border Transport, *U.S. EPA National Ambient Air Monitoring Conference*, Nov. 2-5, Nashville, TN.

44. Raysoni A, **Li W-W**, Sarnat S, Sarnat J, Holguin F, Garcia J, Flores S, 2009, Intra-urban spatial variation

of $PM_{2.5}$, $PM_{10-2.5}$ and black carbon mass concentration in El Paso, *SACNAS National Conference, Improving the Human Condition: Challenges for Interdisciplinary Science*, Oct. 15-18, 2009, Dallas, TX

45. Mares JM, **Li W-W**, Cheu RL, 2009. A GIS-Based Emission and Air Quality Impact Assessment for Evaluating Transportation, *Institute of Transportation Engineers 2009 Annual Meeting and Exhibit,* Aug. 9-12. San Antonio, TX.

46. Cahill TA, Gill TE, Pingitore NE, Olvera H, Clague JW, Barnes DE, Perry KD, **Li W-W**, Amaya M A, 2009. Size-Time-Composition Resolved Study of Aerosols Across El Paso, Texas in Fall 2008. American Geophysical Union Fall Meeting 2009, abstract #EP21A-0570, San Francisco, CA

47. Chen LW, Tropp R, Zhu D, **Li W-W**, 2009. Air Toxics and Aerosol Concentration at El Paso, Texas: Implications for Cross-Border Transport, *AAAR 28th Annual Conference*, Oct. 26-30, Minneapolis, MN

48. Holguin F, Flores S, Sarnat SE, **Li W-W,** Raysoni A, Sarnat J, 2009. Phenotypical comparison of children with asthma across the US-Mexico border, *the American Thoracic Society ATS 2009 International Conference*, May 15-20, 2009, San Diego, California

49. Sarnat SE, Raysoni A, **Li W-W**, Flores-Luévano S, Holguin F, Sarnat JA, 2009. Traffic-Related Air Pollution in the US-Mexico Border Region, *Thoracic Society ATS 2009 International Conference*, May 15-20, 2009, San Diego, California.

50. Raysoni AU, **Li W-W,** Sarnat JA Sarnat SE, Holguin F, Garcia JH, Olvera HA, Garcia MI, 2009. Measurements of $PM_{2.5}$ and NO_2 in Multiple Microenvironments at Four Schools Across Two Border Cities in North America, the *7th International Conference on Air Quality - Science and Application (Air Quality 2009)*, March 24-27, 2009, Istanbul, Turkey.

51. Raysoni AU, Garcia JH, **Li W-W**, Sarnat SE, Sarnat JA, Holguin F, Guerrero V, Luévano SF, 2009. Children's Exposure to Coarse Particulate Matter ($PM_{10-2.5}$) at Schools in the Paso del Norte Region, *NEHA's 73rd Annual Educational Conference (AEC) & Exhibition*, June 21-24, 2009, Atlanta, Georgia

52. Olvera HA, **Li W-W**, Pingitore NE Jr, Amaya M, Gamez J, Baca DJ, Garcia JH, Garcia N, Garcia M, 2009. Application of Land Use Regression to a Sub-region of an Urban Metropolis for Exposure Assessment, *NEHA's 73rd Annual Educational Conference (AEC) & Exhibition*, June 21-24, 2009, Atlanta, Georgia

53. Lee DW, Zietsman J, Farzaneh M, **Li W-W**, Olvera HA, Storey JM, Kranendonk L, 2009. Investigations of In-Cab Air Quality of a Truck Residing in an Electrified, presented in *the 2009 Annual TRB Meeting*, Jan. 11-15, 2009, Washington, D.C.

54. Raysoni AU and **Li W-W**, 2008. Health Impacts of Traffic Related Air Pollution, presented in the *2nd International Congress of Environmental Research ICER -08*, Dec. 18-20, 2008. Goa, Goa, India.

55. Raysoni, **Li W-W**, Sarnat JA, Sarnat SE, Holguin F, Garcia JH. Olvera HA, Garcia MI, 2008. Ambient Concentrations of $PM_{2.5}$ and NO_2 at Four Schools on the U.S.-Mexico Border, presented in *the 2nd International Congress of Environmental Research ICER -08*, Dec. 18-20, 2008. Goa, Goa, India

56. **Li W-W**, Gamez J, Baca DJ, Olvera HA, Garcia JH, Staniswalis J, Garcia N, Garcia M, Pingitore NE Jr, Amaya M, Nelly K, Lighty J, 2007. Investigation of the Number Concentrations of Ultrafine Particles in the Nocturnal PM Peaks, presented in *the 3rd International Symposium on Nanotechnology, Occupational and Environmental Health*, August 29-September 1, 2007, Academia Sinica, Taipei, Taiwan.

57. **Li W-W**, Olvera HA, Gamez J, Pingitore NE Jr, 2007. Source and Health Implication of Diurnal Atmospheric PM Mass and Number Concentrations, presented in *the 2007 American Geophysical Union Fall Meetin*g, San Francisco, CA, Dec. 10-15, 2007.

58. Olvera HA, **Li W-W**, Pingitore NE Jr, 2007. The Effects of Plume buoyancy and Momentum on The Flow Structure and Dispersion in the vicinity of an idealized building, presented in *the 2007 American Geophysical Union Fall Meeting,* San Francisco, CA, Dec. 10-15, 2007.

59. Myer O, Gonzales M, **Li W-W**, Olvera H, Pingitore N, Amaya M, 2007. Selection of Optimal Air Monitoring Sites for Enhancing Population Exposure Estimates from Land Use Regression Models, presented in the *17th Annual Conference of the International Society for Exposure Analysis*, Durham, N.C., October 14-18, 2007.

60. Lighty, JS, Wendt JOL, Kelly K, **Li W-W,** Staniswalis J, Sarnat J, Sarnat S, Holguin F, Witten M, 2007. A Planning Study to Investigate the Impacts of Dust and Vehicles on Acute Cardiorespiratory Responses in the Arid Southwest, presented in the *Health Effects Institute 2007 Annual Conference*, April, 2007, San Francisco, CA.

61. Meuzelaar H, Arnold N, Jaramillo C, Kelly K, Mejia G, Garcia J, Santos J, Martinez M, Sierra M, Rojas A, Estrada A, Richaud N, **Li W-W**, Gamez J, Garcia N, Baca DJ, 2006. Near-instantaneous Impacts of High PM Episodes on Cardiopulmonary Function in Healthy Adults, presented in *the Building Environmental Security In The Border Region Through Binational Cooperation*, Dec. 12-13, Tucson, AZ

62. Gamez J, Baca DJ, Olvera HO, Garcia N, Garcia M, Astorga F, Garcia JH, Mejia J, Kelly K, Lighty J, **Li W-W,** 2006. Investigation of the Nocturnal PM Peaks for Evidence of Association with Population Health Risks in Two Border Cities, presented in the *Building Environmental Security In The Border Region Through Binational Cooperation*, Dec. 12-13, Tucson, AZ

63. **Li W-W**, Garcia J, Cardenas N, 2006. Associations of low-wind particulate matter spikes with regional emissions at Sunland Park, New Mexico, presented at the EPA *2006 National Air Monitoring Conference*, Nov. 9 -12, 2006, Las Vegas, NV.

64. Olvera HA, Gamez J, Garcia N, Baca JD, Garcia M, Astorga F, Sias J, Pingitore NE Jr, Currey R, Amaya M, Gonzales M, Orrin M, Burchiel SW, **Li W-W**, 2006. Ambient monitoring of PM and co-pollutants for use in the assessment of childhood asthma in Hispanic households, presented at *the EPA 2006 National Air Monitoring Conference*, Nov. 9 -12, 2006, Las Vegas, NV.

65. Mora J, Lee WY, Roche R, **Li W-W**, 2006. Polycyclic Aromatic Hydrocarbons Concentrations from Cooking in Demographically Representative Residences in the U.S.-Mexico Border Region, presented

at the specialty conference on the *Indoor Environmental Quality - Problems, Research and Solutions* , July 17-19, 2006, Durham, NC

66. Mora J, Astorga F, Gamez J**, Li W-W,** 2006. Characteristics of Related Indoor PM2.5 from Cooking in Demographically Representative Residences at a U.S.-Mexico Border Region, presented at the specialty conference on *Indoor Environmental Quality - Problems, Research and Solutions* , July 17-19, 2006, Durham, NC

67. Pingitore NP, Amaya M, **Li W-W**, Currey R, Burchiel S, Berwick M, 2006. Childhood asthma and respiratory health in Latino children in the El Paso airshed. Presented in the *Health Effects Institute 2006 Annual Conference*, April 9-11, 2006, San Francisco, CA.

68. **Li W-W** and Garcia JH, 2005. Source identification by statistical analyses of surface soil concentrations. Presented at *the 15th Annual Conference on Soils, Sediments, and Water*, March 14-17, San Diego, CA. (O)

69. Garcia JH, **Li W-W**, Walton J, 2005. Determination of PM composition and sources in the Paso del Norte Region Using Time-resolved Integrated Source and Receptor Models. Presented at *the 9th International Congress on Combustion By-Products and their Health Effects*, June 12-15, 2005, Tucson, AZ (O, F)

70. *Olvera H* and **Li W-W**, 2004. Development of a visualization tool for chemical spill emergencies using simulated high-resolution wind fields, Paper presented in *ACHMM 2004 National Conference*, Aug. 1 – 4, Las Vegas, NV.

71. Arimoto R, **Li W-W**, *Cardenas N,* Walton J, *Trujillo D, Morales H,* Sage S, Schloesslin C, 2004. Investigations of the low wind particulate matter spikes at the Sunland Park, New Mexico monitoring site. Paper presented in *the 2004 Border Regional Environmental Conference*, Feb. 10 - 12, 2004, Laredo, TX.

72. *Olvera H* and **Li W-W**, 2003. Development of a GIS-based area source emission inventory in the Paso del Norte air quality basin. Paper presented in *the North American Research Strategy for Tropospheric Ozone (NARSTO) Workshop on Innovative Methods for Emission Inventory and Evaluation*, Oct. 14 – 17, 2003, Austin, Texas.

73. *Garcia JH*, **Li W-W**, Walton J, Arimoto R, Schloesslin C, Sage S, Okrasinski R, Greenlee J, Guttmann W, 2003. Implications on contributing sources by chemical composition in regional surficial soil, Paper presented in *the North American Research Strategy for Tropospheric Ozone (NARSTO) Workshop on Innovative Methods for Emission Inventory and Evaluation*, Oct. 14 – 17, 2003, Austin, Texas.

74. *Cadenas N,* **Li W-W**, Walton J, Arimoto R, *Morales H, Trujillo D,* 2003. Characterization of the diurnal PM peaks at Sunland Park, New Mexico. Paper presented in *the North American Research Strategy for Tropospheric Ozone (NARSTO) Workshop on Innovative Methods for Emission Inventory and Evaluation*, Oct. 14 – 17, 2003, Austin, Texas.

75. Zhang H, Lighty JS, Meuzelaar HLC, Kelly K, Wagner D, Cheya SA, Sarofim AF, Robertson JD, **Li W-W,** 2002. Combustion-related particulate matter source attribution in the Paso del Norte air basin using

multivariate analysis of organic and inorganic speciation data. Paper presented in *the Western State Combustion Institute Meeting*, March 25-26, University of California at San Diego, La Jolla, California, 2002.

76. *Paschold H, Morales H,* **Li W-W,** Walton J, 2002. Field study of the impact of evaporative coolers on PM concentrations. Paper presented in *the Rio Bravo/Rio Grande Environmental Conference*, South Padre Island, Texas, Feb. 20 – 23, 2002.

77. *Paschold H, Morales H,* **Li W-W,** Walton J, 2002. Evaporative cooler effects on indoor PM concentrations under laboratory conditions. Paper presented in t*he Rio Bravo/Rio Grande Environmental Conference*, South Padre Island, Texas, Feb. 20 – 23, 2002.

78. *Gonzalez L,* **Li W-W**, *Rivera-Rio W*, Stock TH, Morandi MT, 2002. Exploratory investigation of indoor and outdoor VOC in Paso del Norte residences. Paper presented in *the Rio Bravo/Rio Grande Environmental Conference*, South Padre Island, Texas, Feb. 20 – 23, 2002.

79. *Bolepwar VV*, Parks NJ, **Li W-W,** 2002. Cost-effective digital imaging technology for visibility analysis in urban and wilderness areas of the U.S.-Mexico border region. Paper presented in *the Rio Bravo/Rio Grande Environmental Conference*, South Padre Island, Texas, Feb. 20 – 23, 2002.

80. Meuzelaar H, Lighty J, Zhang H, Kelly K, Wagner D, Jarman W, Kasteler C, Sarofim A, **Li W-W**, *Garcia J,* Espino T, Mejia-Velazquez G, Sanchez J, 2001. Collection, characterization, attribution and apportionment of particulate matter in the Paso del Norte air basin. *The 2001 SCERP Conference: Promoting Policies to Implement the Vision.* October 17-19, 2001, Universidad Autonoma de Baja California, Mexico.

81. *Garcia J.*, **Li W-W,** Walton J, 2001. Multivariate analysis of wintertime inorganic PM data. *The 2001 SCERP Conference: Promoting Policies to Implement the Vision*. October 17-19, 2001, Universidad Autonoma de Baja California, Mexico.

82. **Li W-W,** Pingitore N, Moss R, *Garcia J,* Espino T, Morales H, Currey R, 2001. Gradient monitoring of airborne PM to evaluate re-entrainment of metals. *The 2001 SCERP Conference: Promoting Policies to Implement the Vision*. October 17-19, 2001, Universidad Autonoma de Baja California, Mexico.

83. Turner CD, **Li W-W**, Martinez A, 2001. Developing sustainable concepts in a College of Engineering, *Green Engineering Conference: Sustainable and Environmentally Conscious Engineering*, July 29 - Aug. 1, 2001. Virginia Polytechnic Institute and State University, Blacksburg, VA.

84. **Li W-W,** 2001. Characterization of atmospheric PM in the Paso del Norte air quality basin, *Extraordinary Joint Advisory Committee Meeting in Honor of Dr. Mario Molina*, El Paso, Texas, May 7, 2001.

85. *Arrieta DE,* Hernandez CC, *Garcia JH*, **Li W-W**, Denison MS, Washburn BS, 2000. Aryl hydrocarbon receptor-mediated effects of particulate organic matter in the Paso del Norte airshed along the U.S. - Mexico. presented at *the 40th Annual Meeting of the Society of Toxicology,* Nashville, TN.

86. *Orquiz* R, **Li W-W**, *Garcia J*, Pingitore N, Espino T, Chow J, 2000. Analysis of temporal and spatial dichotomous PM air samples in the El Paso-Cd. Juarez air quality basin, presented in *the U.S.-Mexico*

Border: A Continuum of Ideas Addressing Environmental Issues, the 2000 SCERP Technical Conference, Cd. Juarez, Chihuahua, Mexico.

87. Muezelaar H, Lighty J, Sarofim A, Jarman W, Jeon S, Sheya S, Kasteler C, Anderson J, Perry D, **Li W-W,** Valenzuela V, Mejia G, Perez M, Simoneit M, 2000. Progress towards identification and apportionment of particulate matter sources in the Paso del Norte Airshed, presented in *the U.S.-Mexico Border: A Continuum of Ideas Addressing Environmental Issues, the 2000 SCERP Technical Conference*, Cd. Juarez, Chihuahua, Mexico.

88. *Garcia J,* Walton J, **Li W-W,** 2000. Relationship between meteorological parameters and ozone, El Paso, Texas/Cd. Juarez, Chihuahua. *ASCE Texas Section Fall 2000 Meeting*, Oct. 4 -7, 2000, El Paso, Texas.

89. *Chianelli J*, **Li W-W,** *Ledesma L, Yang Z,* Gray R, 2000. Rapid assessment of chemical spills for international communities. *ASCE Texas Section Fall 2000 Meeting,* Oct. 4 -7, 2000, El Paso, Texas.

90. *Orquiz R*, **Li W-W,** Pingitore N, *Becerril I,* 1999. Evaluation of temporal PM fine and coarse concentrations in El Paso, presented in *the U.S.-Mexico Border: An Exchange of Ideas, the 1999 SCERP Technical Conference*, Las Cruces, New Mexico.

91. *Becerril I*, **Li W-W,** *Gallardo KG,* 1999. Implication of potential PM sources based on hourly meteorological and PM concentration data in El Paso, presented in *the U.S.-Mexico Border: An Exchange of Ideas, the 1999 SCERP Technical Conference*, Las Cruces, New Mexico.

92. Espino TT, Gardea-Torresdey J, **Li W-W**, Pingitore N, 1999. Multi-elemental compositions of particulate in PM2.5 and PM10 filters from the Paso del Norte airshed, presented in *the U.S.-Mexico Border: An Exchange of Ideas, the 1999 SCERP Technical Conference*, Las Cruces, New Mexico.

93. Sheya SA, Meuzelaar H, Dworzanski J, **Li W-W**, 1999. Multivariate approach to PM characterization and attribution in the Paso del Norte airshed, presented in *the U.S.-Mexico Border: An Exchange of Ideas, the 1999 SCERP Technical Conference*, Las Cruces, New Mexico.

94. **Li W-W,** 1999. An expert systems approach to managing and minimizing the consequence of accidental chemical spills in the U.S. – Mexico border region, presented *in the U.S.-Mexico Border: An Exchange of Ideas, the 1999 SCERP Technical Conference*, Las Cruces, New Mexico. (P)

95. *Pearson R, Mercado F, Aguilar H,* Fitzgerald R, **Li W-W,** 1999. Characterization of wind field for the Paso del Norte airshed using high-resolution grids and Data from multiple meteorological monitoring stations, presented *in the U.S.-Mexico Border: An Exchange of Ideas, the 1999 SCERP Technical Conference*, Las Cruces, New Mexico.

96. *Castro NJ* and **Li W-W,** 1999. Evaluation of ozone air quality data collected from six sites in the Paso del Norte air basin, presented *in the U.S.-Mexico Border: An Exchange of Ideas, the 1999 SCERP Technical Conference*, Las Cruces, New Mexico.

97. Parks NJ, **Li W-W,** Gray RW, Turner CD, Dattner SL, Saenz J, *Valenzuela V,* 1999. Haze and visibility analysis in the Paso del Norte airshed: 1998 - 1999, presented in *the U.S.-Mexico Border: An Exchange of Ideas, the 1999 SCERP Technical Conference*, Las Cruces, New Mexico.

98. Gray R and **Li W-W,** 1998. Dynamic integration of GIS and emission inventory within the Paso del Norte air quality basin. Presented in *AW&MA Emission Inventory: Living in a Global Environment Conference*, New Orleans, LA.

99. **Li W-W,** 1994. Use of a risk-based methodology for acquisition of recreational land in New Jersey. In *Proceedings of the 2nd International Comparative Risk Analysis Symposium - Priority Setting of Environmental Issues*. Taipei, Taiwan, November 14-16.

100. Hentz KL, Rosolowsky LJ, **Li W-W,** Lage G, 1993. Case study comparison of reasonable worst-case and Monte Carlo simulation approaches to risk assessment. Paper presented at *the 1993 Annual Meeting of the Society of Toxicology*. Seattle, WA, Feb.

101. Harnett PB, Greenhalgh ME, **Li W-W**, Firth MJ, 1993. Air dispersion modeling confirms lead air sampling results and assists in selection of respiratory protection at a Superfund site. Paper presented at *the 1993 American Industrial Hygiene Conference & Exposition.* New Orleans, LA, May.

102. Washburn ST, **Li W-W**, Nichols A, 1993. Incineration, risk assessment and the Clean Air Act. Paper presented at *the 1993 Incineration Conference*, Knoxville, Tenn., April 30 - May 2.

103. McFarland AR, Cermak JE, Peterka JA, Ortiz CA, **Li W-W,** 1986. Evaluation of a rotating slotted-cylinder large particle sampler. *Proceedings of the 1986 Conference on Chemical Defense Research, U.S. Army*, CRDC, Aberdeen Proving Ground, Md., November.

Selected Technical Reports

1. Chavez MC, Williams E, Cheu K, **Li W-W**. 2022 Assessing the health and environmental benefits associated with changes in transportation activities in near-road communities using low-cost sensors, final report submitted to the Center for Transportation, Environment, and Community Helath: a U.S. DOT Tier UTC, May, 2022. 61 pages.
2. Valenzuela V, Fitzgerald R, Yang H, Pinal G, Cheu RL, **Li W-W**, 2013. Photochemical Modeling of Ozone Pollution in the Paso del Norte Region, prepared for El Paso Metropolitan Planning Organization, 231 pages.
3. Mares J, Sosa T, Wookay A, **Li W-W**, 2013. Analysis of Targeted Emission Reduction Possibilities in the Paso del Norte, Task 1: PM emissions from unpaved roads in Ciudad Juarez, prepared for TCEQ, 83 pages.
4. Wookay A, Mares J, Sosa T, **Li W-W**, 2013. Analysis of Targeted Emission Reduction Possibilities in the Paso del Norte, Task 2: PM emissions from the Ciudad Juarez Cement Plant, prepared for TCEQ, 59 pages.
5. Wookay A, Sosa T, Mares J, **Li W-W**, 2013. Analysis of Targeted Emission Reduction Possibilities in the Paso del Norte, Task 3: Volatile organic compound emissions from gasoline fueling stations, prepared for TCEQ, 52 pages
6. Mares J, Sosa T, Wookay A, **Li W-W**, 2013. Analysis of Targeted Emission Reduction Possibilities in

the Paso del Norte, Task 4: Volatile organic compound emissions from automotive paint and body shops, 34 pages

7. Sandoval A, Pinal G, Ponce C, Chavez M, Fitzgerald R, Yang H, **Li W-W**, 2012. Supplementary Ozone Monitoring in the Paso del Norte Region for the 2012 Ozone Season, prepared for El Paso Metropolitan Planning Organization, 140 pages

8. Yang HY, Cheu KRL, Montoya T, Fitzgerald R, **Li W-W**, 2012. Quantification of Selected Sources for Emission Inventory Improvement in El Paso, Texas. Submitted to the El Paso MPO, Dept. of Civil Engineering, the University of Texas at El Paso. El Paso, TX, 56 pages

9. **Li W-W**, Fitzgerald R, Yang HL, Yang HY, Olvera H, Cheu KRL, 2011. Conceptual Model for Ozone Reduction in El Paso, Texas. Submitted to the El Paso MPO, Dept. of Civil Engineering, the University of Texas at El Paso. El Paso, TX, 272 pages

10. **Li W-W**, Yang HY, Olvera H, Cheu KRL, Fitzgerald R, Yang HL, 2011. Emission Inventory Review and Improvement Plan. Submitted to the El Paso MPO, Dept. of Civil Engineering, the University of Texas at El Paso. El Paso, TX, 79 pages

11. Mora J, Gamez J, Astorga-Bustillo F, **Li W-W,** 2006. Speciation of Indoor Air Pollutants and Associated Inhalation Health Hazards Caused by Cooking and Heating in Hispanic Households, Submitted to the Southwest Center for Environmental Research and Policy (268 pages)

12. Lighty J, Wendt J, Kelly K, **Li W-W**, Staniswalis J, Sarnet J, Sarnat S, Holguin F, 2007. A Planning Study to Investigate the Impacts of Dust and Vehicles on Acute Cardiorespiratory Responses in the Arid Southwest, Submitted to the Health Effects Institute.

13. Arimoto R and **Li W-W**, 2004. Investigations of the Low-wind Particulate Matter Spikes at the NMED Sunland Park City Yard Monitoring Site, Project Number A-02-01. Submitted to the Southwest Center for Environmental Research and Policies. (13 pages)

14. **Li W-W,** *Olvera HA, Morales H,* 2003. *Development of a Visualization Tool for Hazardous Releases – Rapid Assessment of Chemical Emergencies (RACE)*, Technical Report for the U.S. Army Research Laboratory White Sands Missile Range, Contract DATM05-02-P-0127, February 21, 2003. (37 pages)

15. Parks NJ, Gray RW, **Li W-W**, 2002. *Visibility Research with the Texas Commission on Environmental Quality Camera System in the Paso del Norte and West Texas Regions 2001 - 2002*, Technical Report for the Texas Commission on Environmental Quality, Contract 582-2-48680, September 30, 2002. (57 pages)

16. **Li W-W** and *Paschold H,* 2002. *Determining the impacts of evaporative cooling systems on indoor air quality,* submitted to the ARP/ATP Program, Texas Higher Education Coordinating Board. (291 pages)

17. **Li W-W** 2000. *Characterization of Ambient Particulate Matter in the Paso del Norte Region, Phase II: Data Enhancement*, in *Ten Years Retrospective of SCERP Program*, edited by D. Pijawka.

18. Parks NJ and **Li W-W**, 1999. *Digital Acquisition and Internet Distribution of Haze Images in the Paso*

del Norte Airshed, Technical Report for the Texas natural Resources Conservation Commission for Contract 582-9-15892.

19. Kleiman CF, **Li W-W**, Stern AH, 1994. *Development of a methodology for deriving risk-based soil guidelines for recreational exposure*. Paper submitted to J. of Ecotoxicology and Environmental Safety.

20. Environ Corp (**Li W-W**, co-principal author). 1993. *Development of a methodology for interpreting environmental data from potential Green Acres sites – Final report. Vols. I and II.* Prepared for New Jersey Department of Environmental Protection and Energy, Division of Science and Research and Green Acres Program, Trenton, NJ., June 1993.

21. **Li W-W**, Thoroddsen ST, Peterka JA, Cermak JE, 1987. *Experimental study of internal flow in a roasting kiln*, Technical Report for Adolph Coors Company, Golden, CO, July 1987, CER87-88WWL-STT-JAP-JEC2, Fluid Dynamics and Diffusion Laboratory, Colorado State University.

22. **Li W-W**., J.E. Cermak, J.A. Peterka, and Y.C. Liao. 1987. *Wind-tunnel study of exhaust-intake cross contamination and dispersion of roof-top emissions. The Health Science Center, University of Texas at San Antonio, San Antonio, TX*, Technical Report for the University of Texas at San Antonio, San Antonio, TX, June, CER86-87WWL-JEC-JAP-YCL3, Fluid Dynamics and Diffusion Laboratory, Colorado State University.

23. **Li W-W**., J.E. Cermak, and J.A. Peterka. 1986. *Wind-tunnel study of exhaust-intake cross-contamination and dispersion of roof-top emissions, Life Sciences Building, Emory University, Atlanta*, Technical Report for Rosser-Fabrap International, Atlanta, November, CER 86-87WWL-JEC-JAP10, Fluid Dynamics and Diffusion Laboratory, Colorado State University.

24. McFarland, A.R., J.E. Cermak, J.A. Peterka, C.A. Ortiz, and **Li W-W**. 1986. *Wind-tunnel evaluation of a rotating-element large particle sampler*. Technical Report for U.S. Army Chemical and Research Development Center, Aberdeen Proving Ground, MD. (Contract DAAG 29-81-D-0100), June 1986 *revised October 1986).

25. Bienkiewicz B, **Li W-W**, Peterka JA, Cermak JE, 1986. *Wind-tunnel study of wind loads for B.L. England Station Stack Replacement*, Technical Report for Stearns Catalytic Corporation, Philadelphia, PA, October 1986, CER85-86BB-WWL-JAP-JEC30, Fluid Dynamics and Diffusion Laboratory, Colorado State University.

26. Poreh M, **Li W-W**, Peterka JA, Cermak JE, 1986. *Physical modeling of plumes from cooling-tower emissions. Liquid Air Company, Denver*, Technical Report for Colorado Department of Highways, Denver, Colo., August, CER86-87MP-WWL-JAP-JEC2, Fluid Dynamics and Diffusion Laboratory, Colorado State University.

27. **Li W-W**, Peterka JA, Cermak JE, 1986. *Physical modeling of Good Engineering Practice stack height at B. L. England Station, Units 1, 2, and 3, Atlantic City Electric Company*. Technical Report for Stone & Webster Engineering Corporation, Cherry Hill, N.J., March, CER85-86JAP-WWL-JEC-MP3, Fluid Dynamics and Diffusion Laboratory, Colorado State University.

28. **Li W-W**, Peterka JA, Cermak JE, 1986*. Stack gas dispersion caused by the architectural lighthouse at B. L. England Station*, Technical Report for Stone & Webster Engineering Corporation, Cherry Hill, N.J., March, CER85-86JAP-WWL-JEC25, Fluid Dynamics and Diffusion Laboratory, Colorado State University.

29. Peterka JA, Cermak JE, **Li W-W,** 1986. *Wind tunnel study of LPC Mandalay, Las Colinas, Texas, Technical Report for Brockette & Associates, Inc., Dallas, TX*, February, CER85-86JAP-JEC16, Fluid Dynamics and Diffusion Laboratory, Colorado State University.

30. Peterka JA, Cermak JE, **Li W-W,** 1986*. Wind tunnel study of LPC Mandalay, Las Colinas, Texas, Appendices A-F*, Technical Report for Brockette & Associates, Inc., Dallas, TX, February, CER85-86JAP-JEC16, Fluid Dynamics and Diffusion Laboratory, Colorado State University.

31. Peterka JA, **Li W-W**, Cermak JE, Poreh M, 1985. *Wind-tunnel study of stack gas dispersion at B.L. England Station, Units 1,2, and 3, Atlantic City Electric Company*. Technical Report for Stone & Webster Engineering Corporation, Cherry Hill, N.J., June 1985, CER84-85JAP-WWL-JEC-MP45, Fluid Dynamics and Diffusion Laboratory, Colorado State University.

32. Peterka JA, Cermak JE, **Li W-W,** 1985*. Wind tunnel study of Hotel Intercontinental, Second Tower, San Diego, California*, Technical Report for Pacific Landmark Hotel, Ltd., La Jolla, CA, October, CER85-86JAP-JEC-WWL7, Fluid Dynamics and Diffusion Laboratory, Colorado State University.

33. Peterka JA, Cermak JE, **Li W-W,** 1985. *Wind tunnel study of Inpatient Replacement Building, Massachusetts General Hospital, Boston*, Technical Report for McNamara/Salvia Consulting Engineers, Boston, MA, August, CER85-86JAP-JEC-WWL5, Fluid Dynamics and Diffusion Laboratory, Colorado State University.

34. Peterka JA, Cermak JE, **Li W-W,** 1985*. Pedestrian wind data supplement for Inpatient Replacement Building, Massachusetts General Hospital, Boston*, Technical Report for McNamara/Salvia Consulting Engineers, Boston, MA, August, CER85-86JAP-JEC-WWL5a, Fluid Dynamics and Diffusion Laboratory, Colorado State University.

35. Baldwin LV, Johnson RG, **Li W-W**, Meroney RN, 1985. *The estimation of turbulent dispersion from velocity statistics, Part I: The Lagrangian autocorrelation function*. CEP84-85LVB-GRJ-WWL-RNM13, Fluid Dynamics and Diffusion Laboratory, Colorado State University.

36. Cermak JE, Peterka JA, Zeller K, **Li W-W,** 1985. *Wind characteristics for Hawaiian Electric Company transmission lines on Oahu: Physical model study in a boundary-layer wind tunnel*. Technical Report for Hawaiian Electric Company, Inc., Honolulu, May, CER84-85JEC-JAP-KZ-WWL51, Fluid Dynamics and Diffusion Laboratory, Colorado State University.

37. Poreh M, **Li W-W**, Cermak JE, Peterka JA, 1985*. Physical modeling of diesel generator exhaust dispersion, Limerick Generating Station Units 1 and 2, Philadelphia Electric Company*, Technical Report for Bechtel Power, San Francisco, February, CER84-85MP-WWL-JEC-JAP42, Fluid Dynamics and Diffusion Laboratory, Colorado State University.

38. **Li W-W** and Meroney RN, 1982. *The estimation of turbulent diffusion at nuclear reactor plants*

utilizing real time anemometer statistics. Colorado State University, Fort Collins, CO, July 1982, CET82-83WWL-RNM1.

39. **Li W-W,** 1981*. Wind tunnel study of gas dispersion near a cubical model building*, M.S. Thesis, Colorado State University, Fort Collins, CO, Summer, 1981. CET80-81WWL30.

Ph.D. and M.S. Graduates (served as Dissertation/Thesis Advisor)

Ph.D

1. Aguilera, J., 2020. Association of traffic related air pollution with physical activity and cardiorespiratory health outcomes in at-risk populations from El Paso, Texas, **Ph.D. Dissertation** (Co-advisor with Leah Whigham), **Best Ph.D. Dissertation, College of Health Science, UTEP, 2020**
2. Chavez, M., 2019. Assessing children's spatiotemporal exposures to transportation pollutants in near-road communities, **Ph.D. Dissertation, Best Ph.D. Dissertation, College of Engineering, UTEP, 2020**
3. Montoya, T., 2013. Characterization of particulate matter concentrations (PM_{10}, $PM_{10-2.5}$, $PM_{2.5}$) at high-altitude school and residential microenvironments in Quito, Ecuador, **Ph.D. Dissertation.**
4. Valenzuela, V., 2013 Evaluation of emission control strategies to reduce ozone pollution in the Paso del Norte region using a photochemical air quality modeling system, **Ph.D. Dissertation.**
5. Raysoni, A., 2011. Assessment of intra-urban traffic related air pollution on asthmatic children's exposure at schools in the Paso de Norte Region, **Ph.D. Dissertation.**
6. Mares, J., 2010. A GIS-based emission and air quality impact assessment tool for evaluating transportation mitigation measures, **Ph.D. Dissertation**.
7. Olvera, H., 2006. Numerical simulations of a hydrogen release in the vicinity of a cubical building*, **Ph. D. Dissertation***
8. Garcia, J., 2004. Determination of PM compositions and sources in the El Paso del Norte region using time-resolved integrated source and receptor models. ***Ph.D. Dissertation**.*
9. Paschold, H., 2002. The effects of evaporative cooling on indoor/outdoor air quality in an arid region*, **Ph.D. Dissertation***

M.S.

10. Leonardo D. Vazquez-Raygoza, 2022. Identifying particulate matter spatial variation in the El Paso del Norte region using land-use regression modeling and data obtained from a network of low-cost sensors. M.S. Thesis.
11. Marcos A. Banta-Morales, 2022. Influence evaluation on near-road concentrations of PM2.5 during Covid-19 pandemic. M.S. Thesis
12. Ivan M. Ramirez, 2021. Sensitivity analysis of transportation emissions on near-road air dispersion using the EPA-approved Gaussian air dispersion model AERMOD. M.S. Thesis

13. Adan Rangel, 2018. A comparative study characterizing traffic related air pollutant concentrations at near-road communities in El Paso, Texas, M.S. Thesis
14. Chavez, M., 2016. Estimating air concentrations using MOVES generated site-specific traffic emissions, M.S. Thesis.
15. Sisneros, M., 2014. Evaluation of ozone trends in southern Dona Ana County, New Mexico thru wind rose analysis and use of HYSPLIT model, M.S. Thesis.
16. Sandoval, A., 2012. Evaluation of ozone trends and distribution in the Paso del Norte region using TCEQ's CAMS data and ozone data collected at two supplemental sites, M.S. Thesis.
17. Arizpe, G.E., 2012. Analysis of air quality impacts in Sunland Park, New Mexico by Puerto Anapra, Mexico using the CALPUFF modeling system, **M.S. Thesis**.
18. Pinon, J., 2011. Analysis of indoor and outdoor particulate matter at various residences in the El Paso region, **M.S. Thesis**.
19. Sosa, T., 2010. Development of a land-use regression model to predict nitrogen dioxide concentrations, **M.S. Thesis**.
20. Guerrero, V., 2010. Variation of number and mass concentration of particular matter at the international Bridge of the Americas in El Paso, Texas, **M.S. Thesis**
21. Garcia, M., 2010. Assessing annual and seasonal spatial variability of ambient PM10 using linear regression analysis in a US-Mexico urban sprawl, **M.S. Thesis**
22. Garcia, N., 2008. Analysis of number and mass concentration of coarse and fine particulate matter measurements within a heavy-duty diesel truck stop, **M.S. Thesis**.
23. Gamez, J., 2007. Diurnal variations in ambient fine and ultrafine particle concentrations near a major highway in El Paso, Texas, **M.S. Thesis**.
24. Singavarapu, S.L., 2007. Prediction of H_2S Emissions from a Wastewater Treatment Plant and Determining Its Impact Using an Air Dispersion Model-AERMOD, **M.S. Thesis**.
25. Mora, J., 2006. Characterization of indoor $PM_{2.5}$ cooking pollutants in Paso del Norte households, **M.S. Thesis**
26. Franco, C., 2006. Impact assessment of H2S emitted from a wastewater treatment plant using AERMOD air dispersion model and field data, **M.S. Thesis**
27. Gaddala Vijay, Deepti D., 2006. Polycyclic aromatic hydrocarbon in the city of El Paso, **M.S. Thesis**
28. Molina, E., 2005. Implications of Airborne $PM_{2.5}$ and Nitrogen Dioxide at Cd. Juarez, Mexico, ***M.S. Thesis***
29. Velarde, R., 2004. The Impacts of Arsenic Emissions on the Community Due to the Historical Operation of a Metal Processing Plant, ***M.S. Thesis***
30. Raina, D., 2004. Innovative Monitoring of Visibility Using Digital Imaging Technology in an Arid Urban Environment, ***M.S. Thesis***

31. Cardenas, N., 2003. Meteorological and chemical analyses of airborne PM at Sunland Park, NM, ***M.S. Thesis*****.**

32. Nagaraj, A., 2002. Sensitivity analysis of CAMx ozone modeling at the Paso del Norte air quality basin, ***M.S. Thesis***

33. Olvera, H., 2002. GIS-based emission inventory for the El Paso Ciudad Juarez Region, ***M.S. Thesis***

34. Sawant, R. 2002. Haze and visibility in wilderness and urban areas. ***M.S. Thesis***

35. Orquiz, R., 2001. Gravimetric and Elemental Concentrations of Particulate Matter in the El Paso-Cd. Juarez air Basin. ***M.S. Thesis***

36. Chianelli, J. R. 2001. Rapid Assessment of Chemical Spills for International Communities. ***M.S. Thesis***

37. Borelepwar, V., 2001. The Haze and Visibility in the Paso del Norte Airshed. ***M.S. Thesis***

38. Gonzalez, L., 2001. Characterization and Measurement of Indoor VOC Concentrations in the Paso del Norte Region. ***M.S. Thesis***

39. Cervantes, R. 2001. Modeling the VOC emission episodes at a petroleum processing facility. ***M.S. Thesis***

Adviser/Supervisor to Current Ph.D. and M.S. Students:

Post-Doctoral Fellow

1. Dr. Mayra Chavez

Ph.D. Students:

1. Perla Torres, ESE
2. Karen del Rio, Education

M.S. Students:

1. Leonard Vazquez
2. Marcos Banta
3. Evan Williams

Undergaduate Students:

1. Berenice Flores
2. Leonardo Vasquez
   Vazquez L., 2021. **The application of low-cost sensors for assessing PM air pollution in the El Paso del Norte Region,** COURI Spring 2021 Virtual Symposium, April 26-30, 2021 (Mentor: Li W.-W)
3. Evan Williams
   Williams E., 2021. **Assessing Ambient Air Quality Using Real-time Air Monitors Mounted on a Transit Vehicle,** COURI Spring 2021 Virtual Symposium, April 26-30, 2021 (Mentor: Li W.-W)

EXHIBIT F

INTRO:
El Paso's Puente Libre- The Bridge of the Americas in barrio Chamizal is receiving $700+million of federal Bipartisan Infrastructure funding for necessary renovations. This long-overdue investment should be used as intended- to reduce the emissions and address the impact on overburdened, vulnerable communities, specifically, our children's health.

"This is a public health issue. Lives are being affected. To dismiss the health of residents and prioritize the maquiladora industry is not acceptable." We have not had clean air for 30 years! Protect our health. We - as residents of the Chamizal are asking representatives and public entities such as the Joint Advisory Council to Tell NEPA to "Get the Trucks Out!"

"After a year and a half of advocacy, the federal government has -as of December 13, 2023- provided a potential alternative design that removes the heavy polluting diesel semi-trucks from el puente libre, BOTA. We want to send a clear message that this alternative #4 is the only option that would address this dangerous public health issue. The time to relocate the idling trucks is now,"

According to the National Institute of Health: diesel semi truck pollution (PM2 ultrafine particles) are the worst of the worst! These dangerously small cancer causing particles infect our lungs 🫁 restricting our ability to breath, seep posion into our bloodstream 🩸 , settle in our bones 🦴 , as the toxicity damages our brains 🧠 deteriorating our cognitive abilities for a lifetime. Our children are most vulnerable, especially Zavala Elementary students, who during their most important developmental years, they're inundated in diesel truck pollution because the 500+ diesel trucks that surround them daily using the free bridge- El Puente Libre .

The World Health Organization declared that Diesel fumes cause lung cancer. Experts state diesel fumes "are more carcinogenic than secondhand cigarette smoke." We Must Protect Children's Health and place a very high priority on communities like ours where environmental injustice has deadly and debilitating consequences. The effects are forever. "We need this once-in-a-lifetime investment to protect children from this silent killer. To prioritize the profits of an industry over the health of our children is wrong. The working poor families of El Paso should not have to bear these burdens," states Hilda Villegas, president of Familias Unidas del Chamizal neighborhood association.

Diesel exhaust is the worst of the worst. The EPA states, it contains more than 40 toxic 'cancer-causing' air contaminants. A recent study reveals large diesel trucks to be the greatest contributors to harmful emissions on the road, indicating that vehicle types matter more than traffic volume for near-road air pollution. "Whether it be cancer, respiratory problems, cardiac problems or neurodegenerative problems, there are numerous adverse health effects associated with the chemicals in these emissions. If we were able to reduce emission of pollutants, we would see an immediate climate benefit."

In fact, we are part of a national coalition to address this killer particulate matter- we spent the years during covid organizing on the PM issue, and we convinced the EPA to strengthen standards on pm2.5. We are represented by TRLA

Will NEPA'S Environmental Impact Statement include a Cumulative Impact or Health Analysis?

PLEASE SUBMIT YOUR COMMENTS TO NEPA BY/BEFORE FRIDAY, FEB. 23, 2024, 3PM (MST) to: BOTA.NEPACOMMENTS@GSA.GOV

Tell the to: GET THE TRUCKS OUT, NOW!

SAMPLE TEXT: Dear NEPA: (Introduce yourself) My name is xxxxxxx and I am very concerned about the health of my community. (Highlight concern) Barrio Chamizal has heavy semi truck traffic is a public heatlh issue causing dangerous levels of pollution. (Personal is Powerful!) My child has difficulty breathing and suffers from asthma. (Demand) Get the Trucks Out, Now! Protect our Health! We urge NEPA to select Option #4: REMOVAL OF COMMERCIAL TRUCKS. (*Extra: Ask Questions) Will NEPA'S Environmental Impact Statement include a Cumulative Impact or Health Analysis? Thank you. Sincerely, xxxxxx

We will be collecting comment cards to hand-deliver, too. Please come by Cafe Mayapan, 2000 Texas Ave. to fill out your card.

APPENDIX B

Scoping, Public Involvement, and Agency Coordination

APPENDIX B

Public Outreach Efforts

Office of City Representative
CHRIS CANALES
El Paso City Council District 8

February 7, 2024

To whom it may concern:

I am writing to you representing the interests and concerns that I share with many of my constituents in District 8 and in consideration of the significant role of the Bridge of the Americas Land Port of Entry (BOTA) as a vital gateway between El Paso and Ciudad Juárez. I wish to express my position on the ongoing modernization project for BOTA, with particular concern for the role of commercial traffic in the Port's future. I recognize the importance of modernizing our infrastructure to meet evolving standards and demands, and I appreciate the efforts of the General Services Administration (GSA) in overseeing this significant project. I value the opportunity for public input provided through public meetings and scoping sessions, and that is why I am submitting this letter to be considered as part of the National Environmental Policy Act (NEPA) scoping process that the GSA is currently engaged in.

Having reviewed community feedback and concerns, as well as alternative proposals presented during the public scoping meeting on December 13, 2023 including *Action Alternative #4– No Commercial Traffic*, there has emerged a prevailing sentiment among area residents regarding the impact of commercial vehicle traffic. Many community members, including representatives from various neighborhood associations and advocacy groups, have expressed serious misgivings about the adverse effects of idling commercial vehicles on air quality, public health, and the overall well-being of nearby residents. In light of these concerns, which are backed by historical data on air quality and the incidence of respiratory disease, I am writing to formally convey my preference for the removal of commercial truck traffic from the Bridge of the Americas, a preference that I also shared when I met with the GSA's Regional Project Manager Daniel Partida several months ago. I believe that such an adjustment would align with the City of El Paso's commitment to the health and welfare of our residents and contribute to the sustainability and livability of the surrounding communities. I want to commend the GSA and its Federal government counterparts for the work already done leading up to the public presentation of Alternative #4, including significant consultation with our critically important partners in Mexico.

I recognize the crucial importance of cross-border trade and connectivity. However, I firmly believe that any modernization efforts should also prioritize the safety, health, and quality of life of the residents who call El Paso home. I understand that the GSA is undertaking a comprehensive Environmental Impact Statement (EIS) as part of the NEPA process to assess the various alternatives and their potential implications. I encourage the GSA to consider the input received from the community and explore alternatives that mitigate concerns related to commercial truck traffic while still achieving the overall objectives of the modernization project. Other El Paso-area ports of entry with less densely populated surrounding areas, particularly those in nearby Tornillo and Santa Teresa, are uniquely positioned to absorb the commercial traffic demand of the region with significantly less impact.

I am committed to working collaboratively with the GSA, federal agencies, and the community to ensure that the modernization of the Bridge of the Americas aligns with the best interests of the residents of my district. I appreciate your attention to this matter and look forward to continued dialogue and cooperation. Thank you for your dedication to this critical project, and I anticipate positive outcomes that will benefit BOTA's users, stakeholders, and community members alike across the El Paso Borderland region.

Good wishes,

Chris Canales
City Representative
El Paso City Council, District 8

cc: Hon. Mayor of El Paso Oscar Leeser
Hon. Members of the El Paso City Council
El Paso Interim City Manager Cary Westin
Eduardo Calvo, Executive Director, El Paso MPO
Daniel Partida, Regional Project Manager, GSA
Karla R. Carmichael, NEPA Program Manager, GSA

EPA-NADBank BOTA Contract
Stakeholders' Meeting
Friday, February 9, 2024 – 9:00 a.m.

Attending: Ibarra-Mejia Gabriel, Briselda Duarte, Charlie Hart, Norma Hijar, Karla GSA, Albert Melero, Valerie Ramirez, Carlos Rincon, Loraine Rodriquez, Robert Tinajero, Hennry Van

9:00 Gabriel Ibarra- Mejia Welcome:
Dr. Ibarra Gives a warm welcome and begins with introduction of himself and addresses projects transition in leadership. Dr. Ibarra emphasizes his commitment to the project and its success.
9:04 Loraine Rodriquez:
Introduces herself as the new intern who will be assisting in project management while nourishing interest in public health, environmental health, and community level health.
9:05 Begin with The Air Quality Assessment Project Overview:
Dr. Ibarra provides an overview of the project's status by stating accomplishments and acknowledging setbacks followed by a solution.

- Dr. Ibarra explains David Dubois will oversee the Air Quality Assessment but could not make it to the meeting due to his attendance at the NOAA meeting. David Dubois is having no issues with sampling at BOTA as CBP chiefs and staff were very helpful.
- We have collected 26 Teflon filter samples with MiniVol PM2.5
- We continue to collect 5-minute PM2.5 data with TSI DustTrak, 2-minute PM2.5 Purple Air, and 5-minute weather data
- Next Teflon filter samples are scheduled on February 12 and 18 and collecting air samples through the end of February.
- David Dubois would like to get an additional day to get filter samples to view with a NMSU scanning electron microscope to get photos of the aerosols to be shown in the report and for presentations.
- Dr. Ibarra states Next steps are to get approval from TCEQ on collocation at Chamizal station.
- **9:06 Carlos** Rincon suggests Dr. Mayra Chavez and Eddie Moderow will facilitate talking to TCEQ for approval.
- **9:08** Albert Melero volunteered to get in contact with representatives for weather station install device

9:10 Health Risk Assessment – Gabriel Ibarra-Mejia
The Original scope was to do an occupational health risk assessment by having an estimation of what would be the potential risks for the neighboring communities based on the bridge being a point source.
9:11 Policy Framework Assessment – Charles Boehmer
Dr. Ibarra explains Charles Boehmer could not be with us today.

- Dr. Ibarra is pending communication with him.
- Charles Boehmer should submit a proposal to IRB for approval on in person interviews from personnel regarding their health concerns and exposures.
- Dr. Ibarra suggest we need to explore more options to see if we can get other people on board from bridge personnel

9:12 Sociological Assessment – Gabriel Ibarra-Mejia
Dr. Ibarra explains Christina Morales has stepped down from this component with less than 20 percent of activities completed in this area.

- Dr. Ibarra assures productivity

- Already established strategy on how to go about delivering this component within the scope and within the timeline.
- Need to complete a plan on how to move forward with this strategy for approval.

9:15 Transportation – Henry Van

Dr. Van Introduces Salvador by explaining his expertise in transportation and his extensive knowledge of the community as a local. Dr. Van will be working with Salvador and helping him with the coordination.

- Dr. Van will be working with David Dubois to gain information on the air quality
- Salvador would like to coordinate a meeting with CBP through Valerie Ramirez to communicate with the people of BOTA to explain what will be done
- No Impact on the budget
- Identify opportunities for improvement
- Salvador will not be monitoring traffic at the bridge he will be using data to work on the project
- Using GPS to map coordinates
- Will be getting done on time
- **19:16 Valerie Ramirez** believes everything is working smoothy and she is here for everyone's support

19:17 Finance Coordination – Dr. Gabriel Ibarra- Mejia

- Dr. Ibarra expresses challenges with coordination, but he assures they are working diligently on the status of the BOTA technical and financial report
- Productive meeting with Briselda Duarte
- Will be completed within the next couple of days

19:18 Debrief

- Dr. Ibarra mentions project challenges and shows appreciation for participants
- He will be keeping everyone in the loop

19:19 Dr. Ibarra opened the floor for questions and concerns

- **Briselda Durate**
  - Approaching to 35-40% of the project development
  - In the next meeting she would like a brief presentation on each of the tasks and percentage wise how everyone is doing.
  - Dr. Ibarra agrees to do brief presentations on each task

19:30 Meeting Adjourn

APPENDIX B

Scoping, Public Involvement, and Agency Coordination

APPENDIX B

Agency Coordination Letters

REGION 6
DALLAS, TX 75270

February 23, 2024

VIA Electronic Mail

Karla R. Carmichael
General Services Administration
819 Taylor Street
Fort Worth, Texas 76102

Re: Docket Number 2023-0002

Dear Ms. Carmichael:

The Region 6 office of the U.S. Environmental Protection Agency (EPA) has reviewed the General Services Administration (GSA) Public Buildings Service (PBS) Scoping request to solicit input regarding the impacts associated with the proposed Bridge of the Americas (BOTA) Land Port of Entry (LPOE) Modernization Project (Docket Number 2023-0002) in El Paso, Texas. To assist in the scoping process, we have identified the following areas for your attention in the preparation of the GSA Environmental Impact Statement (EIS):

Statement of Purpose and Need

We recommend the document clearly identify the underlying purpose and need to which the GSA is responding in proposing the alternatives. The purpose of the proposed action is typically the specific objectives of the activity, while the need for the proposed action may be to eliminate a broader underlying problem or take advantage of an opportunity.

Alternatives Analysis

The National Environmental Policy Act (NEPA) requires evaluation of reasonable alternatives, including those that may not be within the jurisdiction of the lead agency. A robust range of alternatives will include options for avoiding significant environmental impacts. We recommend the analysis provide a clear discussion of the reasons for the elimination of alternatives which are not evaluated in detail. The environmental impacts of the proposal and alternatives should be presented in comparative form, thus sharply defining the issues, and providing a clear basis for choice among options by the decision maker and the public. The potential environmental impacts of each alternative should be quantified to the greatest extent possible (e.g., acres of habitat impacted, tons per year of emissions produced).

Environmental Justice (EJ) and Tribal Analysis

GSA stated in the Federal Register that the EIS will identify, describe, and analyze the potential effects of the action alternatives and the no action alternative. Development of the Draft EIS should be consistent with Executive Orders (EO) 12898 and 14096. EO 14096, *Revitalizing our Nation's Commitment to Environmental Justice for All,* supplements EO 12898, *Federal Action to Address Environmental Justice in Minority Populations and Low-income Populations,* by modernizing and improving how the Federal government confronts environmental injustice. EO 14096 directs agencies to consider disproportionate and adverse direct, indirect, and cumulative effects (including effects unrelated to Federal activities, as appropriate).[1]Agencies are also directed to consider historic inequities and barriers to receiving equitable access to health and environmental benefits in communities with EJ concerns (including persons with disabilities). EPA recommends GSA incorporate relevant provisions of EO 14096 when developing the EIS.

EPA strongly encourages the use of EJScreen during EIS development efforts. EPA's nationally consistent EJ screening and mapping tool is a useful first step in highlighting locations that may be candidates for further analysis. The tool can help identify potential community vulnerabilities by highlighting potential health disparities, calculating EJ Indexes, and can also help focus environmental justice outreach efforts by identifying potential language barriers, meeting locations, tribal lands and indigenous areas, and lack of broadband access. In an initial screening of a 1-mile buffer area surrounding the proposed project site, several relevant EJ Indexes and Supplemental Indexes registered in the 99th percentile, including diesel particulate matter, air toxics cancer risk, and traffic proximity (see attached sample EJScreen Community Report).

GSA states the BOTA Land Port of Entry faces a heavy daily traffic volume because it does not require paid tolls and experiences significant congestion that cannot be supported by the existing port facilities. In addition to EJScreen, EPA recommends use of other appropriate tools and resources for considering potential disproportionate and adverse traffic-related and other impacts, including local area knowledge (e.g., community advisory groups, health impact assessments, and other relevant local data). The *Promising Practices for EJ Methodologies in NEPA Reviews* report is another useful resource to consider throughout the NEPA process, including during scoping and when considering reasonable project alternatives. As noted in the *Promising Practices* report, agencies can benefit from encouraging communities to propose their own alternatives and having each reasonable alternative in the EIS reflect a comparable level of detail regarding potential environmental justice concerns.

GSA stated it will document measures that could potentially avoid, minimize, or mitigate any identified adverse impacts in the EIS. EO 14096 directs agencies to consider mitigation measures for disproportionate impacts to the maximum extent practicable, including cumulative impacts already experienced by communities with EJ concerns. Additionally, CEQ EJ Guidance states agencies should identify and give heightened attention to "alternatives (including alternative sites), mitigation strategies, monitoring needs, and preferences expressed by the affected community or population" when addressing disproportionate impacts. Consistent with EO 14096 and the Council on Environmental Quality EJ Guidance, EPA recommends GSA conduct meaningful engagement with

[1] EO 14096 also directs EPA to assess whether each agency analyzes and avoids or mitigates disproportionate human health and environmental effects on communities with EJ concerns in carrying out its Clean Air Act Section 309 responsibilities.

affected communities throughout the NEPA process (including creation of a community advisory group) to help inform the identification of potential disproportionate impacts and the subsequent development of potential mitigation measures.

EPA recommends GSA comply with Executive Order 13175 in conducting government-to-government consultation with federally recognized tribes potentially affected by the proposed project. In addition, EPA recommends any potential direct, indirect, and cumulative impacts to communities with EJ concerns be identified and explained in plain, clear, and concise language.

Climate Change Impacts

Climate change adaptation and resilience

Considering ongoing and projected regional and local climate change, EPA recommends that GSA ensures consideration of robust climate resilience and adaption planning in the design of the proposed project to protect the infrastructure investment from the effects of climate change. Considering potential climate change impacts helps ensure that investments made today continue to function and provide benefits, even in the future under different climate change scenarios.

EPA recommends that GSA specifically discuss how future climate change may alter the frequency and intensity of climate risks such as flooding and extreme weather events or bring about new climate risks. Consideration of these impacts could help avoid siting infrastructure investments in vulnerable locations, as well as unintended impacts on local communities.

When carrying out these climate vulnerability assessments, EPA recommends that GSA uses climate projections tailored to the project area rather than general climate projections for the whole country or state, such as by citing literature reviews specific to the project location or carrying out local flood modeling that integrates climate change projections.

Direct and Indirect Emissions

EPA expects the EIS to quantify construction and operational Greenhouse Gas (GHG) emissions in Carbon Dioxide equivalents (CO_2e), as well as each individual GHG (methane, nitrous oxide, etc.) emitted. Also, EPA recommends that the EIS quantify all indirect GHG emissions associated with the proposed action, such as emissions from vehicles utilizing the BOTA.

GHG Significance

EPA does not recommend expressing project-level GHG emissions as a percentage of national or state GHG emissions. A comparison of project-level emissions to national and state emissions diminishes the significance of project-scale GHG emissions and associated project-specific contributions to overall GHG emissions. Instead, we recommend GSA includes a discussion of whether these increases are consistent with the State climate plan as proposed and in conjunction with the cumulative impacts of other GHG emissions sources in the State. Additionally, EPA recommends the EIS discusses whether the estimated GHG emissions from the project are consistent with taking action to achieve science based national GHG reduction targets and any relevant state or local goals.

Social Cost of GHG's

EPA recommends the EIS provide an estimate of the social cost of greenhouse gases using the methods and values in the Federal Interagency Working Group (IWG) current draft guidance. This calculation is a useful parameter for disclosing GHG impacts and benefits of mitigation and for comparison across alternatives. In addition to direct emissions sources, we recommend that the social cost of greenhouse gases be calculated for the indirect emissions as well. We also recommend that the full set of assumptions used in this calculation be provided.

GHG Mitigation

EPA recommends that the EIS discuss all reasonable and practical mitigative measures that avoid, reduce, or minimize emissions associated with the project. GSA could consider mitigation options applicable to the construction, operation, and purpose of the LPOE to include best practices that reduce emissions during construction, and reduction of emissions during life cycle operations. Particular attention should be paid to explaining the quality of the proposed mitigation, including its permanence, verifiability, and enforceability.

Wetlands and Water Quality

The Rio Grande is an international boundary water that has been disrupted and impacted by man-made creations and activities such as dams, irrigation diversions, agricultural impacts, etc. According to EPA's Environmental Justice Screening and Mapping Tool, there are multiple reaches of the Rio Grande within the proposed project area that are identified as Impaired. Please include a list of 303(d) listed waters in close proximity to the proposed project components. Discuss how the project is expected to impact impaired waters and non-impaired waters.

In Region 6, EJ Indexes at or above the 70th percentile within the project area trigger the need for more EJ considerations for that specific community. The project area is within the 95th - 100th percentile for "Wastewater Discharge" and multiple tracts are considered disadvantaged due to meeting more than one burden threshold and the associated socioeconomic threshold according to the CEQ's Climate and Economic Justice Screening Tool. Analysis of restorative practices that can be implemented into sustainable designs of BOTA LPOE infrastructure is recommended to address water quality issues in the project area. Riparian restoration through revegetative efforts can help address water, soil, and air quality. Please include a detailed description of efforts to revegetate temporarily impacted areas. This should include a monitoring schedule to ensure revegetation success. EPA also recommends the document discuss the project's consistency with applicable stormwater permitting requirements. Requirements of a stormwater pollution prevention plan should be reflected as appropriate in the document.

If applicable, EPA supports the EIS including measures that could potentially avoid, minimize, or mitigate any identified adverse impacts of action alternatives to CWA 404 jurisdictional waters. Additional analysis and public participation per 33 U.S.C. § 1344(a) are also recommended regarding climate and EJ. EPA encourages GSA to notify all impacted communities with EJ concerns that may affect waters of concern to these parties. Even broader considerations may be used to consider potential impacts on communities exceeding 70th percentile on one or more EJ indicators such as the

"public interest review" in determining whether to issue a § 404 permit, in addition to determining whether a permit satisfies the requirements of the § 404(b)(1) guidelines.

Air Quality

EPA asks that the EIS provides a detailed discussion of ambient air conditions (baseline or existing conditions), National Ambient Air Quality Standards (NAAQS) and non-NAAQS pollutants, criteria pollutant nonattainment areas, and potential air quality impacts of the proposed project. Such an evaluation is necessary to understand the potential impacts from temporary, long-term, or cumulative degradation of air quality.

EPA recommends GSA describe and estimate air emissions from potential construction, maintenance, and operation activities, as well as proposed mitigation measures to minimize those emissions. We recommend an evaluation of the following measures to reduce emissions of criteria air pollutants and hazardous air pollutants (air toxics):

- *Existing Conditions* – Provide a detailed discussion of ambient air conditions, NAAQS, and criteria pollutant nonattainment areas in the vicinity of the project.

- *Quantify Emissions* – Estimate emissions of criteria and hazardous air pollutants (air toxics) from the proposed project and discuss the timeframe for release of these emissions over the lifespan of the project and describe and estimate emissions from potential construction activities, as well as proposed mitigation measures to minimize these emissions. The document should also consider any expected air quality/visibility impacts to Class I Federal Areas identified in 40 CFR Part 81, Subpart D.

- *Specify Emission Sources* – Specify all emission sources by pollutant from mobile sources (on and off-road), stationary sources (including portable and temporary emission units), fugitive emission sources, area sources, and ground disturbance. This source specific information should be used to identify appropriate mitigation measures and areas in need of the greatest attention.

- *Construction Emissions Mitigation Plan* – Please include a draft Construction Emissions Mitigation Plan and ultimately adopt this plan in the Record of Decision. We recommend all applicable local, state (e.g., coordination of land-clearing activities with the state air quality agency to determine air quality conditions such as atmospheric inversions prior to performing open burning activities), or Federal requirements (e.g., certification of non-road engines as in compliance with the EPA Tier 4 regulations found at 40 CFR Parts 89 and 1039) be included in the Construction Emissions Mitigation Plan in order to reduce impacts associated with emissions of particulate matter and other toxics from any potential construction-related activities.

General

The document should discuss noise and lighting impacts from the proposed project and identify any sources that may be impacted. If warranted, GSA should discuss potential mitigation methods to lessen impacts of noise and lighting to nearby populations.

We appreciate the opportunity to provide scoping comments on the BOTA Modernization Project. We look forward to reviewing the EIS related to this effort. If you have any questions, please contact Keith Hayden at (214) 665-2133 or by e-mail at hayden.keith@epa.gov.

Sincerely,

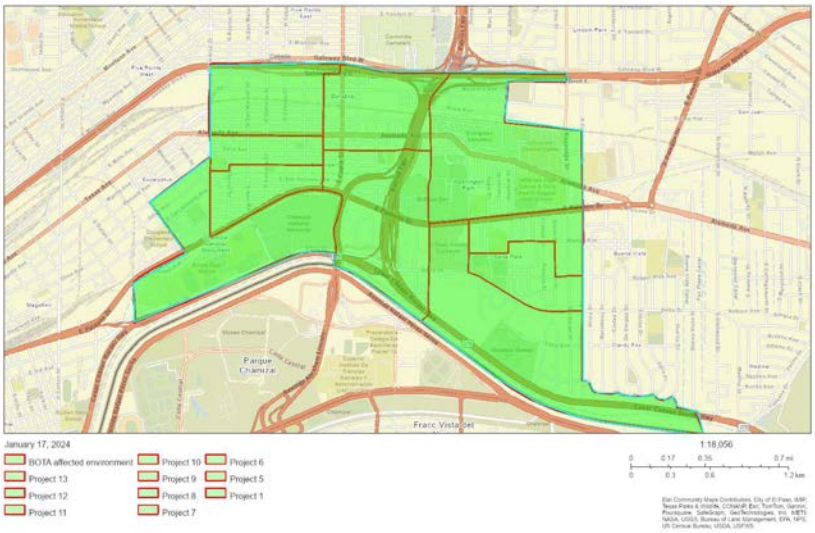
Robert Houston, Staff Director
Office of Communities, Tribes and
Environmental Assessment

Enclosure:
EJScreen Report BOTA project area block groups

EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

A3 Landscape

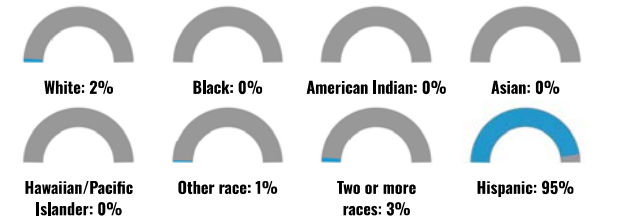


LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	10%
Spanish	90%
Total Non-English	90%

COMMUNITY INFORMATION

BREAKDOWN BY RACE



BREAKDOWN BY AGE

LIMITED ENGLISH SPEAKING BREAKDOWN

Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race.
Source: U.S. Census Bureau, American Community Survey (ACS) 2017 -2021. Life expectancy data comes from the Centers for Disease Control.

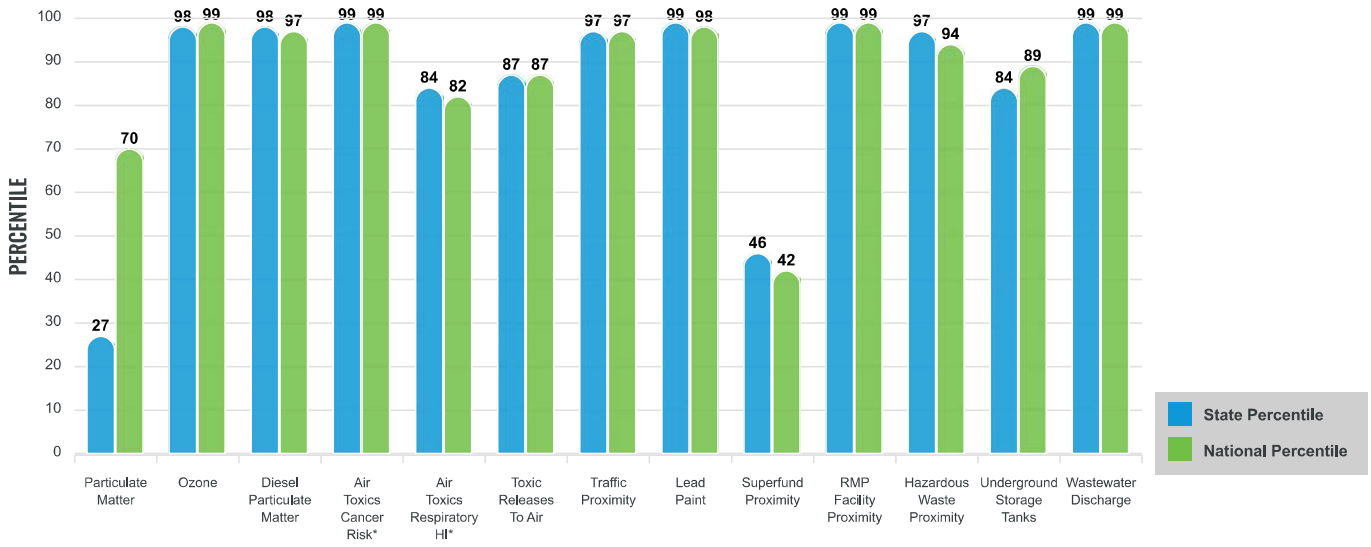
Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the EJScreen website.

EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

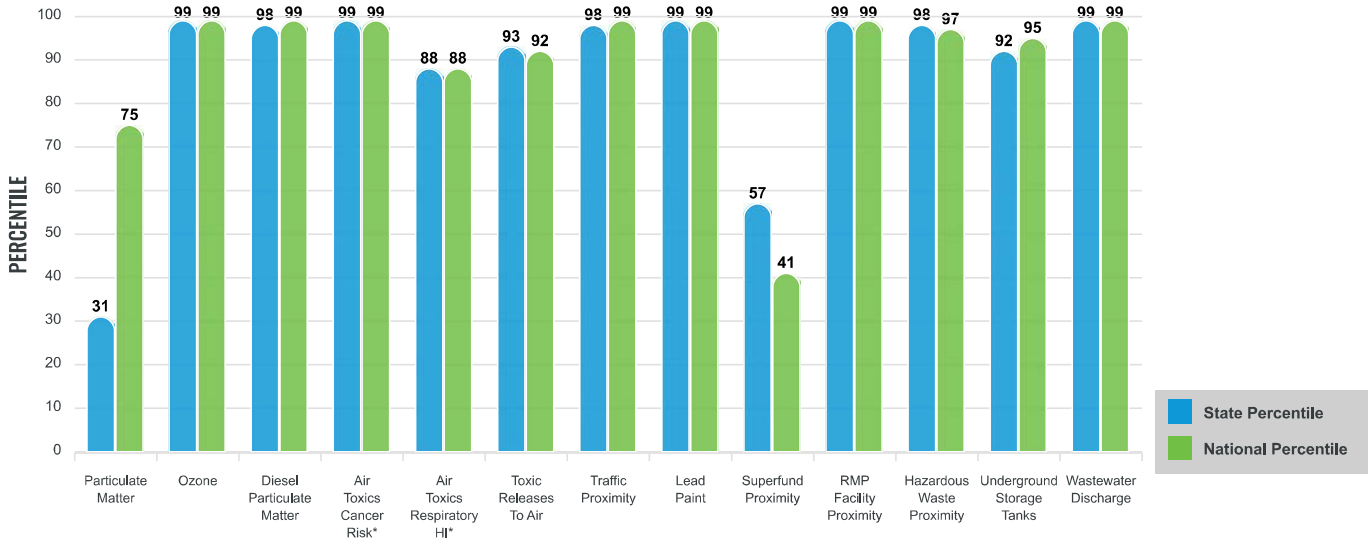
EJ INDEXES FOR THE SELECTED LOCATION



SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.

SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

Report for the User Specified Area

EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
POLLUTION AND SOURCES					
Particulate Matter (µg/m^3)	7.23	9.11	8	8.08	25
Ozone (ppb)	69.9	64.6	88	61.6	93
Diesel Particulate Matter (µg/m^3)	0.349	0.218	89	0.261	77
Air Toxics Cancer Risk* (lifetime risk per million)	40	28	89	25	94
Air Toxics Respiratory HI*	0.3	0.3	29	0.31	31
Toxic Releases to Air	470	12,000	56	4,600	45
Traffic Proximity (daily traffic count/distance to road)	420	150	93	210	88
Lead Paint (% Pre-1960 Housing)	0.62	0.17	92	0.3	81
Superfund Proximity (site count/km distance)	0.015	0.085	17	0.13	10
RMP Facility Proximity (facility count/km distance)	1.9	0.63	93	0.43	96
Hazardous Waste Proximity (facility count/km distance)	1.2	0.75	81	1.9	65
Underground Storage Tanks (count/km^2)	2.4	2.3	64	3.9	62
Wastewater Discharge (toxicity-weighted concentration/m distance)	1.7	0.91	97	22	93
SOCIOECONOMIC INDICATORS					
Demographic Index	90%	46%	98	35%	98
Supplemental Demographic Index	41%	17%	98	14%	98
People of Color	98%	58%	92	39%	95
Low Income	81%	34%	96	31%	97
Unemployment Rate	7%	5%	72	6%	71
Limited English Speaking Households	46%	8%	97	5%	98
Less Than High School Education	51%	16%	95	12%	98
Under Age 5	10%	6%	82	6%	87
Over Age 64	14%	14%	57	17%	43
Low Life Expectancy	21%	20%	59	20%	63

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: https://www.epa.gov/haps/air-toxics-data-update.

Sites reporting to EPA within defined area:

Superfund 0
Hazardous Waste, Treatment, Storage, and Disposal Facilities 0
Water Dischargers 12
Air Pollution 0
Brownfields 0
Toxic Release Inventory 1

Other community features within defined area:

Schools 4
Hospitals 2
Places of Worship 5

Other environmental data:

Air Non-attainment ..... Yes
Impaired Waters ..... Yes

Selected location contains American Indian Reservation Lands* ..... No
Selected location contains a "Justice40 (CEJST)" disadvantaged community ..... Yes
Selected location contains an EPA IRA disadvantaged community ..... Yes

Report for the User Specified Area

EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	21%	20%	59	20%	63
Heart Disease	9.9	5.9	97	6.1	97
Asthma	10.6	9.2	91	10	71
Cancer	4.5	5.2	36	6.1	18
Persons with Disabilities	21.1%	12.3%	91	13.4%	88

CLIMATE INDICATORS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	5%	10%	51	12%	40
Wildfire Risk	0%	30%	0	14%	0

CRITICAL SERVICE GAPS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	32%	15%	87	14%	90
Lack of Health Insurance	34%	18%	91	9%	98
Housing Burden	No	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	Yes	N/A	N/A	N/A	N/A

Footnotes

Report for the User Specified Area

GSA Public Buildings Service
Greater Southwest Region

May 3, 2023

Mark Wolfe
Texas Historical Commission
PO Box 12276
Austin, TX 78711

Re: Initiation of Consultation Pursuant to 36 CFR 800
Bridge of the Americas Land Port of Entry
3600 E. Paisano Drive, El Paso, TX 79905

Dear Mr. Wolfe:

The U.S. General Services Administration (GSA) is proposing to develop the Bridge of the Americas (BOTA) Land Port of Entry (LPOE) property in El Paso. On November 6, 2021, Congress passed the Bipartisan Infrastructure Law (BIL), also known as the Infrastructure Investment and Jobs Act (IIJA). On November 15, 2021, the President signed Executive Order (EO) 14052 "Implementation of the Infrastructure Investment and Jobs Act." Finally on December 13, 2021, the President signed EO 14508 "Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government." On February 25, 2022, President Biden and GSA announced the list of major LPOE projects funded by the BIL. The list of projects includes the Bridge of the Americas LPOE in El Paso.

The project proposes to address multiple deficiencies through replacing the port buildings and infrastructure with a new modernized and expanded facility. Several options are currently being explored in an Enhanced Feasibility Study, which is an update to a 2018 feasibility study that sought to correct port deficiencies and bring facilities up to LPOE Design Standards. The current options being explored include potentially stacking port functions in a multi-level concept and acquiring property next to port. These options are publicly available on the GSA project website and were presented at a public meeting held in early April. A preferred alternative has not been selected. Please see the links at the end of this letter for additional information.

Consultation Request:

This correspondence initiates our consultation pursuant to Section 106 of the National Historic Preservation Act (NHPA) regarding this undertaking in accordance with 36 CFR 800. It is GSA's goals to consult early with your office in our responsibility to comply with Section 106 and more specifically to identify historic properties potentially affected by GSA's undertakings, assess those effects and seek ways to avoid or minimize adverse effects on historic properties.

LPOE Location, Date of Construction, and known Cultural Resources:

The current BOTA LPOE, planned in the 1960s and completed in 1967, is located immediately south E. Paisano Drive (U.S. Highway 62), west of U.S. Highway 54, north of Delta Drive and east of the Chamizal National Monument (see location figures at the end of this correspondence).

Pursuant to Section 110 of the NHPA, the Department of Homeland Security (via Customs and Border Protection [CBP]) and GSA consulted with your office on the eligibility of cultural resources to the National Register of Historic Places (NRHP) within the LPOE's existing boundaries. To date:

- LPOE buildings have been determined not eligible for listing in the NRHP.
- There are no known buried cultural resources. A 2013 CBP sponsored pedestrian survey of the LPOE found it to be built over with structures and pavement. Only a few very small, landscaped areas were extant but identified as disturbed.
- A portion of the LPOE is located within the within the boundaries of the El Paso County Water Improvement District No. 1 (NRHP 1997).

Area of Potential Effects and Studies:

Currently, the Area of Potential Effects (APE) for this undertaking includes the immediate property at the LPOE. As identification of (surrounding or adjacent) historic properties efforts commence under the National Environmental Policy Act (NEPA), GSA and our NEPA Cultural Resources consultant, will identify additional layers of APE, including but not limited to direct effects, visual effects, and other indirect effects as part of their cultural resources reconnaissance and assessments. It is expected that NEPA studies will commence soon, and a final Environmental Assessment will be completed and available for review in late 2023 or early 2024.

Future Consultation:

GSA has identified a preliminary list of parties we will be contacting with invitations to be consulting parties for this undertaking. We would welcome any additions to this list that your office may have. We assume that we will be adding consulting parties to this list via public outreach and interaction during the NEPA process, and that perhaps some invited parties will choose to participate.

We look forward to working with your office on this undertaking. GSA would welcome any initial comments your office may provide, the proposed identification and evaluation work to be conducted at each site, and the proposed consulting parties to be invited to participate in the consultation. Please do not hesitate to contact us if you have any questions. You may reach me at hugo.gardea@gsa.gov or 817.978-4229.

Links to Additional Information:

- Bridge of Americans LPOE Project Website: https://www.gsa.gov/about-us/regions/region-7greater-southwest/buildings-and-facilities/texas/bridge-of-the-americas-land-port-of-entry
- Project Fact Sheet: https://www.gsa.gov/cdnstatic/Region%207%20BOTA%20External%20Fact%20Sheet%20REV041023.pdf
- Proposed Site Alternatives: https://www.gsa.gov/cdnstatic/Community%20Engagement%20%20Meeting%20Presentation.pdf

Very Respectfully,

Hugo A. Gardea
Regional Historic Preservation Officer (7PCD)

Attachments

CC: Beth Savage, GSA Federal Preservation Officer
Daniel Partida, GSA Project Manager
Karla Carmichael, GSA NEPA Manager

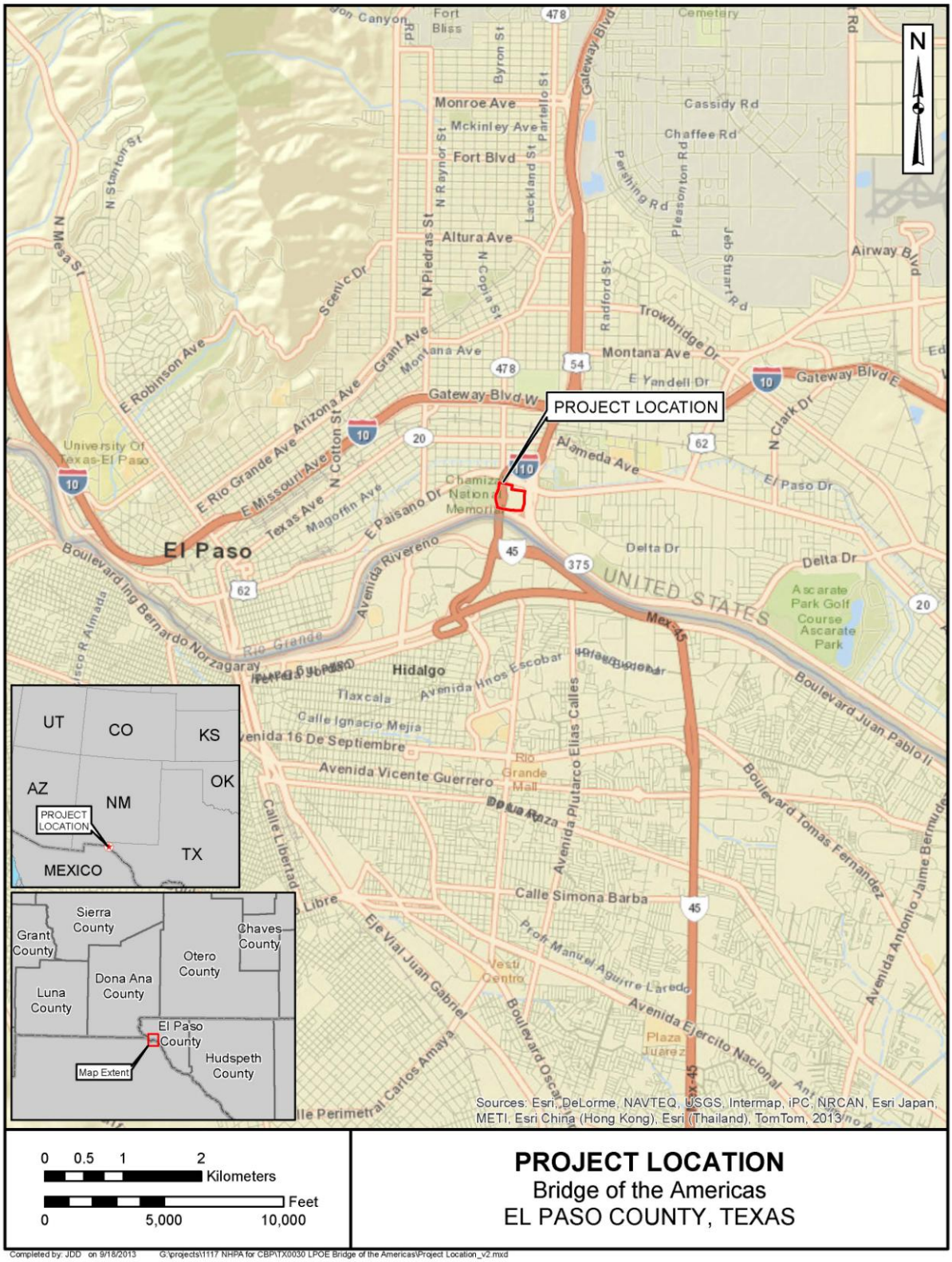
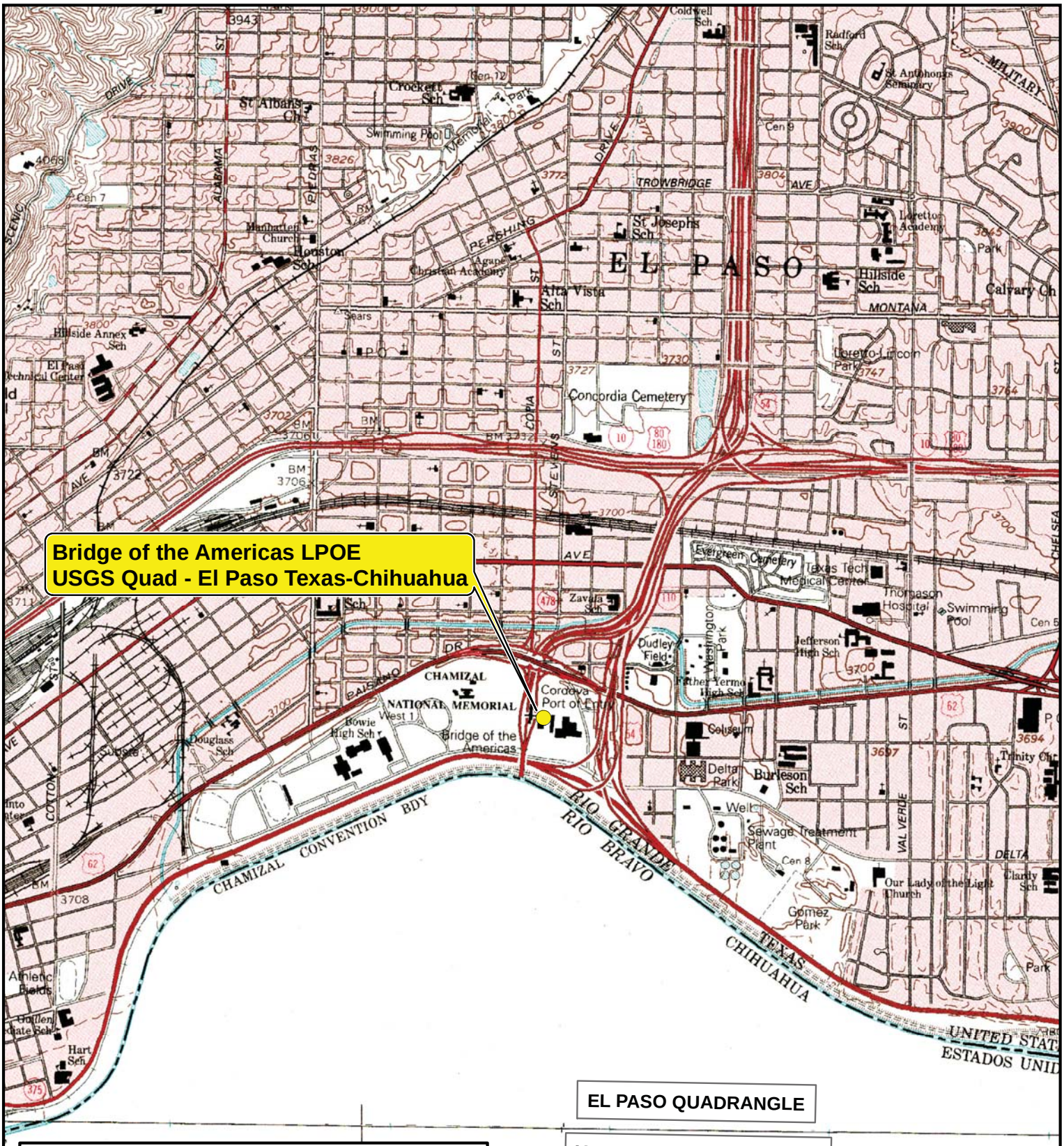


FIGURE 1. BRIDGE OF THE AMERICAS LPOE LOCATION MAP.



USGS 7.5' Topographic Quadrangles for El Paso and Ysleta NW, Texas-Chihuahua (1994)
Datum/Projection: NAD1927 UTM Zone 13N

FIGURE 2. BRIDGE OF THE AMERICAS LPOE LOCATION MAP.

FIGURE 3. BRIDGE OF THE AMERICAS LPOE AERIAL MAP.
The port covers about 28 acres and has fully developed property on three sides with an extensive highway system. The large park property to the left of Highway 110 is the Chamizal National Memorial.

Victoria Green Clow - 7PCD <victoria.clow@gsa.gov>

Redevelopment of Bridge of the Americas Land Port of Entry

1 message

noreply@thc.state.tx.us <noreply@thc.state.tx.us> Thu, Jun 1, 2023 at 10:06 AM
To: victoria.clow@gsa.gov, reviews@thc.state.tx.us

TEXAS HISTORICAL COMMISSION
real places telling real stories

Re: Project Review under Section 106 of the National Historic Preservation Act
THC Tracking #202307848
Date: 06/01/2023
Redevelopment of Bridge of the Americas Land Port of Entry
3600 E. Paisano Drive
El Paso,TX 79905

Description: The project proposes to address multiple deficiencies through replacing the port buildings and infrastructure with a new modernized and expanded facility.

Dear Victoria Clow:
Thank you for your submittal regarding the above-referenced project. This response represents the comments of the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC), pursuant to review under Section 106 of the National Historic Preservation Act.

The review staff, led by Caitlin Brashear, Drew Sitters and Sheena Cox, has completed its review and has made the following determinations based on the information submitted for review:

Above-Ground Resources

- Property/properties are eligible for listing or already listed in the National Register of Historic Places.

We have the following comments: The archeological review staff, led by Drew Sitters, has determined that proposed developments to the immediate property at the Bridge of the Americas Land Port of Entry in El Paso are unlikely to adversely affect historic properties. However, archeological investigations may be warranted in advance of ground disturbing activities in areas surrounding the El Paso County Coliseum and Events Center. Regarding above-ground resources, the History Programs Division review staff, led by Caitlin Brashear, has determined that there are known historic resources located near the proposed project area including the Chamizal National Memorial and El Paso County Water Improvement District No. 1. The Division of Architecture staff, led by Sheena Cox, thanks the client for this initial consultation. We advise the client to thoroughly assess effects to the previously identified designated historical resources and any newly identified historical resources within the Area of Potential Effects. We look forward to working with you on this project. Additionally, please consider inviting the following individuals/agencies to participate in consultation: Dr. Mark Calamia (mark_calamia@nps.gov), Cultural Resources Program Manager & Tribal Liaison at the Chamizal National Memorial; Mark Howe (mark.howe@ibwc.gov), Cultural Resource Specialist at the International Boundary and Water Commission - U.S. Section; and Barbara Anne Welch (obscuredjinn@gmail.com), Chair for the El Paso County Historical Commission.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this review process, and for your efforts to preserve the irreplaceable heritage of Texas. If the project changes, or if new historic properties are found, please contact the review staff. If you have any questions concerning our review or if we can be of further assistance, please email the following reviewers: caitlin.brashear@thc.texas.gov, drew.sitters@thc.texas.gov, sheena.cox@thc.texas.gov.

This response has been sent through the electronic THC review and compliance system (eTRAC). Submitting your project via eTRAC eliminates mailing delays and allows you to check the status of the review, receive an electronic response, and generate reports on your submissions. For more information, visit http://thc.texas.gov/etrac-system.

Sincerely,

for Mark Wolfe, State Historic Preservation Officer
Executive Director, Texas Historical Commission

Please do not respond to this email.

GSA Public Buildings Service
Greater Southwest Region

28 April 2023

Apache Tribe of Oklahoma
Durell Cooper, Chairman
P.O. Box 1220
Anadarko, OK 73005
Phone: (405) 247-9493
Sent via Email to: durellcooper05@gmail.com, apacheculture510@yahoo.com and atcpcrystal@yahoo.com

Re: Initiation of Consultation Pursuant to 36 CFR 800
Bridge of the Americas Land Port of Entry, El Paso, Texas

Dear Chairman Cooper,

The U.S. General Services Administration (GSA) is proposing to redevelop the Bridge of the America Land Port of Entry at 3600 E Paisano Drive, El Paso, Texas. On November 6, 2021, Congress passed the Bipartisan Infrastructure Law (BIL), also known as the Infrastructure Investment and Jobs Act (IIJA). On February 25, 2022, President Biden and GSA announced the list of major port projects funded by the BIL. This legislation included the Bridge of the Americas Land Port of Entry. The project proposes to address multiple deficiencies through replacing the port buildings and infrastructure with a new modernized and expanded facility. This includes potentially stacking port functions in a multi-level concept and acquiring new property next to port. Several options are currently being explored in an Enhanced Feasibility Study and are publicly available on GSA project website. Please see the links at the end of this letter for additional information.

Consultation Request:

In advance of selection of an option, we are seeking to initiate consultation pursuant to Section 106 of the National Historic Preservation Act (NHPA) regarding this undertaking in accordance with 36 CFR 800. It is GSA's goals to consult early with your office in our responsibility to comply with Section 106 and more specifically to identify historic properties potentially affected by GSA's undertakings, assess those effects, and seek ways to avoid or minimize adverse effects on historic properties.

We invite you to be a consulting party for this proposed project to help identify historic properties in the project area that may have religious and cultural significance to your Tribe, and if such properties exist, to help assess how the project might affect them. Please kindly advise us if you have an interest in this undertaking and would like to provide additional information for our consideration.

Facility Background:

The Bridge of the Americas Land Port of Entry was built in 1967. It is on the international border separating El Paso, Texas, and Ciudad Juarez, Chihuahua, Mexico (see Figures 1 and 2). This land port connects with the Mexican land port Cordova in Juarez. It is one of four crossings in

El Paso. The LPOE covers approximately 28 acres and has fully developed property on three sides with an extensive highway system (see Figure 3). Being the only toll-free port of entry in El Paso, an increase in truck and vehicular traffic over the last few years has created significant congestion making it difficult to support this increased volume of traffic. On an average day, over 600 commercial vehicles, 12,500 passenger vehicles, and 2,500 pedestrians use the port. Much of the port facility has reached the end of its life cycle as most of the buildings and infrastructure are operating at or beyond capacity and no longer meeting the U.S. Customs and Border Protection current design standards.

Cultural Resources:

There are no known buried cultural resources or historic buildings located at the port. However, a portion of the facility is located within the within the El Paso County Water Improvement District No. 1, a National Register Historic District. This district is recognized for architectural and engineering features associated with historic irrigation. In 2013, the U.S. Customs and Border Protection sponsored a comprehensive inventory of cultural resources present within the boundaries of the Bridge of the Americas LPOE facility. The property was pedestrian surveyed but found to be built over with structures and pavement. Only a few very small, landscaped areas were extant but identified as disturbed. Twelve buildings and structures were recorded during the architectural survey. Nine buildings and structures were constructed in 2009; the other 3 were built in the 1960s but were heavily altered in 2009.

Additional cultural resources studies are planned in support of the BIL project and will be conducted in coordination National Environmental Policy Act (NEPA) compliance and production of an Environmental Assessment (EA).

Area of Potential Effects and Studies:

Currently, the Area of Potential Effects (APE) for this undertaking includes the immediate property at the LPOE. Cultural resources studies will commence in support of the National Environmental Policy Act (NEPA) studies and in support of compliance with the Section 106 of the NHPA. At that time, GSA and our NEPA Cultural Resources consultant, will further evaluate and finalize the appropriate APE boundaries considering direct effects, visual effects, audible effects, and other indirect effects as part of their cultural resources' reconnaissance and assessments. It is expected that NEPA/NHPA studies will commence soon, and a final Environmental Assessment will be completed and available for review in 2023-2024.

Tribal Input:

We would respectfully request that you inform us if you have an interest in this project. Please include the name, appropriate tribal representative's contact information, and preferred means of communication. We are seeking responses within the required 30-day review period so that we can identify Tribes with an interest in this undertaking. Any requests provided after 30 days will be taken into consideration. We value your assistance and look forward to consulting further if there are historic properties of religious and cultural significance to your Tribe that may be affected by this undertaking.

Links to Additional Information:

- Bridge of Americans LPOE Project Website: https://www.gsa.gov/about-us/regions/region-7greater-southwest/buildings-and-facilities/texas/bridge-of-the-americas-land-port-of-entry
- Project Fact Sheet: https://www.gsa.gov/cdnstatic/Region%207%20BOTA%20External%20Fact%20Sheet%20REV041023.pdf
- Proposed Site Alternatives: https://www.gsa.gov/cdnstatic/Community%20Engagement%20%20Meeting%20Presentation.pdf

If you should have any questions, please do not hesitate to contact:

- Archeology and Historic Preservation Specialist, Victoria Clow: 817.233.9876 or victoria.clow@gsa.gov

- Regional Historic Preservation Officer, Hugo Gardea: 817.978-4229 or hugo.gardea@gsa.gov.

Very Respectfully,

Hugo A. Gardea
Regional Historic Preservation Officer (7PCD)

Attachments

CC: Beth Savage, GSA Federal Preservation Officer
Daniel Partida, GSA Project Manager
Karla Carmichael, GSA NEPA Manager

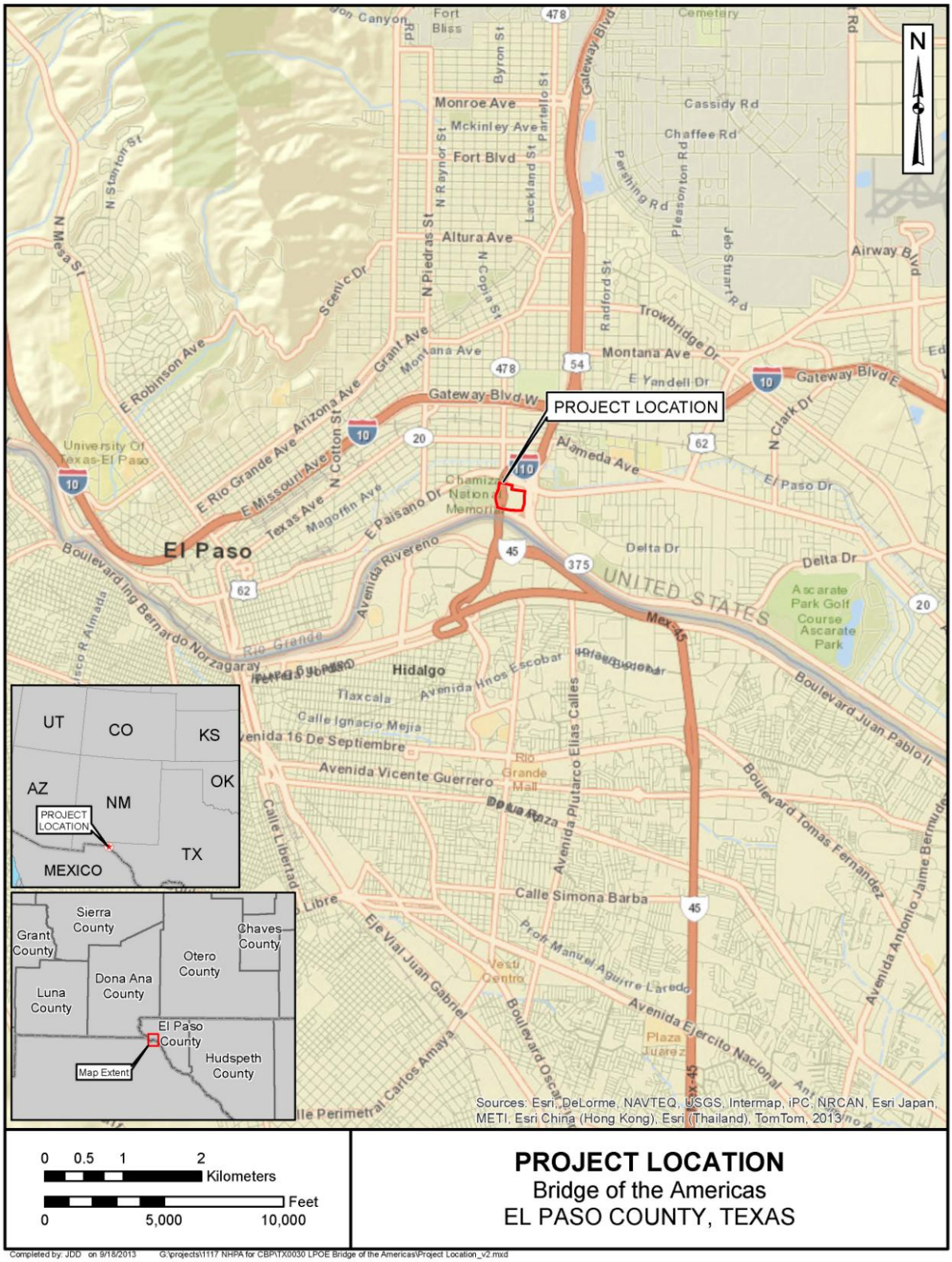
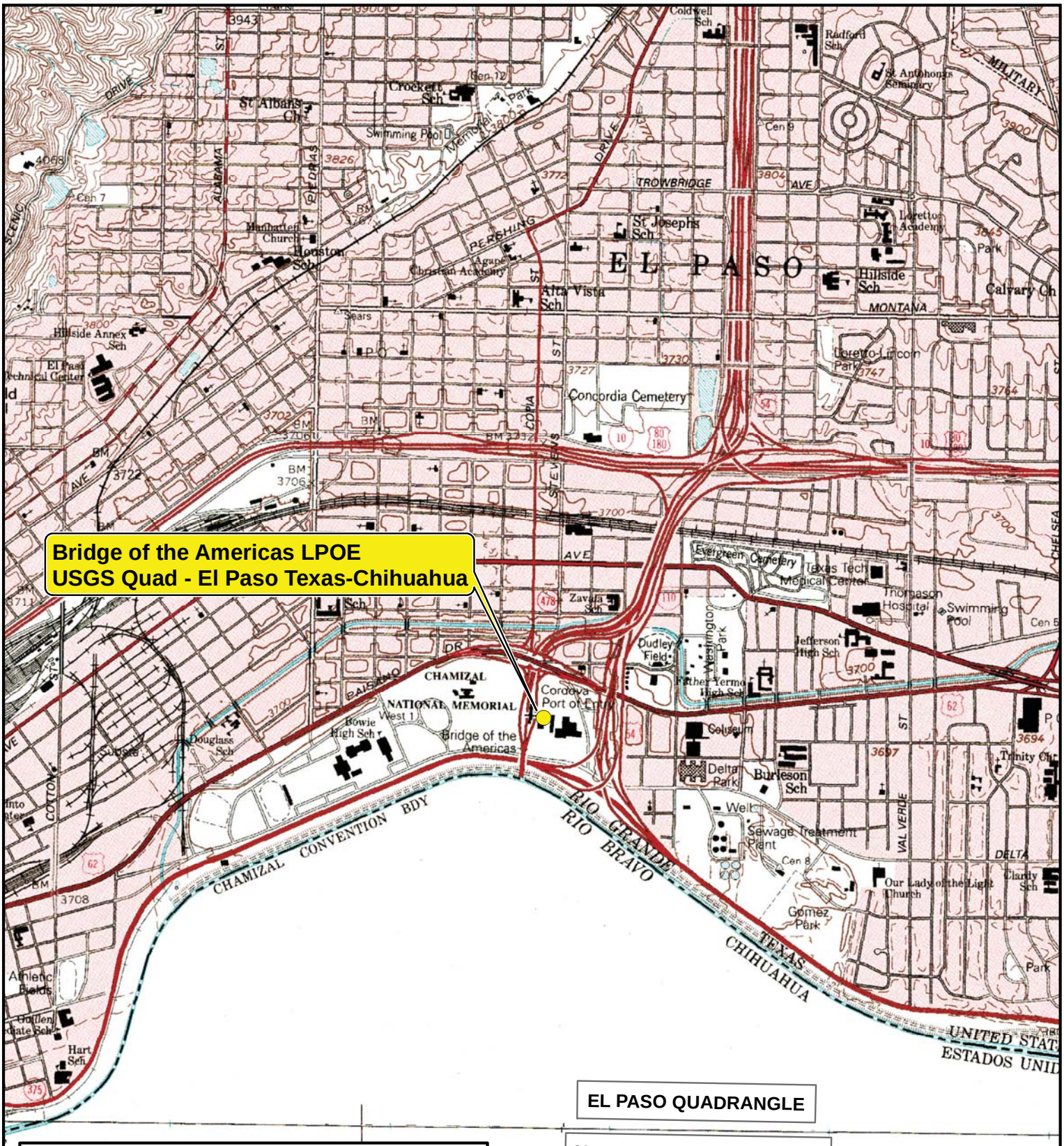


FIGURE 1. BRIDGE OF THE AMERICAS LPOE LOCATION MAP.



USGS 7.5' Topographic Quadrangles for El Paso and Ysleta NW, Texas-Chihuahua (1994)
Datum/Projection: NAD1927 UTM Zone 13N

FIGURE 2. BRIDGE OF THE AMERICAS LPOE LOCATION MAP.

FIGURE 3. BRIDGE OF THE AMERICAS LPOE AERIAL MAP.
The port covers about 28 acres and has fully developed property on three sides with an extensive highway system. The large park property to the left of Highway 110 is the Chamizal National Memorial.

GSA Public Buildings Service
Greater Southwest Region

28 April 2023

Martina Minthorn
Tribal Historic Preservation Officer, Comanche Nation
#6 SW ' D' Avenue, Suite C
Lawton, Oklahoma 73501

Sent via email to: Martina.minthorn@comanchenation.com
Cc: theodorev@comanchenation.com

Re: Initiation of Consultation Pursuant to 36 CFR 800
Bridge of the Americas Land Port of Entry, El Paso, Texas

Dear Ms. Minthorn,

The U.S. General Services Administration (GSA) is proposing to redevelop the Bridge of the America Land Port of Entry at 3600 E Paisano Drive, El Paso, Texas. On November 6, 2021, Congress passed the Bipartisan Infrastructure Law (BIL), also known as the Infrastructure Investment and Jobs Act (IIJA). On February 25, 2022, President Biden and GSA announced the list of major port projects funded by the BIL. This legislation included the Bridge of the Americas Land Port of Entry. The project proposes to address multiple deficiencies through replacing the port buildings and infrastructure with a new modernized and expanded facility. This includes potentially stacking port functions in a multi-level concept and acquiring new property next to port. Several options are currently being explored in an Enhanced Feasibility Study and are publicly available on GSA project website. Please see the links at the end of this letter for additional information.

Consultation Request:

In advance of selection of an option, we are seeking to initiate consultation pursuant to Section 106 of the National Historic Preservation Act (NHPA) regarding this undertaking in accordance with 36 CFR 800. It is GSA's goals to consult early with your office in our responsibility to comply with Section 106 and more specifically to identify historic properties potentially affected by GSA's undertakings, assess those effects, and seek ways to avoid or minimize adverse effects on historic properties.

We invite you to be a consulting party for this proposed project to help identify historic properties in the project area that may have religious and cultural significance to your Nation, and if such properties exist, to help assess how the project might affect them. Please kindly advise us if you have an interest in this undertaking and would like to provide additional information for our consideration.

Facility Background:

The Bridge of the Americas Land Port of Entry was built in 1967. It is on the international border separating El Paso, Texas, and Ciudad Juarez, Chihuahua, Mexico (see Figures 1 and 2). This land port connects with the Mexican land port Cordova in Juarez. It is one of four crossings in

El Paso. The LPOE covers approximately 28 acres and has fully developed property on three sides with an extensive highway system (see Figure 3). Being the only toll-free port of entry in El Paso, an increase in truck and vehicular traffic over the last few years has created significant congestion making it difficult to support this increased volume of traffic. On an average day, over 600 commercial vehicles, 12,500 passenger vehicles, and 2,500 pedestrians use the port. Much of the port facility has reached the end of its life cycle as most of the buildings and infrastructure are operating at or beyond capacity and no longer meeting the U.S. Customs and Border Protection current design standards.

Cultural Resources:

There are no known buried cultural resources or historic buildings located at the port. However, a portion of the facility is located within the within the El Paso County Water Improvement District No. 1, a National Register Historic District. This district is recognized for architectural and engineering features associated with historic irrigation. In 2013, the U.S. Customs and Border Protection sponsored a comprehensive inventory of cultural resources present within the boundaries of the Bridge of the Americas LPOE facility. The property was pedestrian surveyed but found to be built over with structures and pavement. Only a few very small, landscaped areas were extant but identified as disturbed. Twelve buildings and structures were recorded during the architectural survey. Nine buildings and structures were constructed in 2009; the other 3 were built in the 1960s but were heavily altered in 2009.

Additional cultural resources studies are planned in support of the BIL project and will be conducted in coordination National Environmental Policy Act (NEPA) compliance and production of an Environmental Assessment (EA).

Area of Potential Effects and Studies:

Currently, the Area of Potential Effects (APE) for this undertaking includes the immediate property at the LPOE. Cultural resources studies will commence in support of the National Environmental Policy Act (NEPA) studies and in support of compliance with the Section 106 of the NHPA. At that time, GSA and our NEPA Cultural Resources consultant, will further evaluate and finalize the appropriate APE boundaries considering direct effects, visual effects, audible effects, and other indirect effects as part of their cultural resources' reconnaissance and assessments. It is expected that NEPA/NHPA studies will commence soon, and a final Environmental Assessment will be completed and available for review in 2023-2024.

Tribal Input:

We would respectfully request that you inform us if you have an interest in this project. Please include the name, appropriate tribal representative's contact information, and preferred means of communication. We are seeking responses within the required 30-day review period so that we can identify Tribes with an interest in this undertaking. Any requests provided after 30 days will be taken into consideration. We value your assistance and look forward to consulting further if there are historic properties of religious and cultural significance to your Tribe that may be affected by this undertaking.

Links to Additional Information:

- Bridge of Americans LPOE Project Website: https://www.gsa.gov/about-us/regions/region-7greater-southwest/buildings-and-facilities/texas/bridge-of-the-americas-land-port-of-entry
- Project Fact Sheet: https://www.gsa.gov/cdnstatic/Region%207%20BOTA%20External%20Fact%20Sheet%20REV041023.pdf
- Proposed Site Alternatives: https://www.gsa.gov/cdnstatic/Community%20Engagement%20%20Meeting%20Presentation.pdf

If you should have any questions, please do not hesitate to contact:

- Archeology and Historic Preservation Specialist, Victoria Clow: 817.233.9876 or victoria.clow@gsa.gov
- Regional Historic Preservation Officer, Hugo Gardea: 817.978-4229 or hugo.gardea@gsa.gov.

Very Respectfully,

Hugo A. Gardea
Regional Historic Preservation Officer (7PCD)

Attachments

CC: Beth Savage, GSA Federal Preservation Officer
Daniel Partida, GSA Project Manager
Karla Carmichael, GSA NEPA Manager

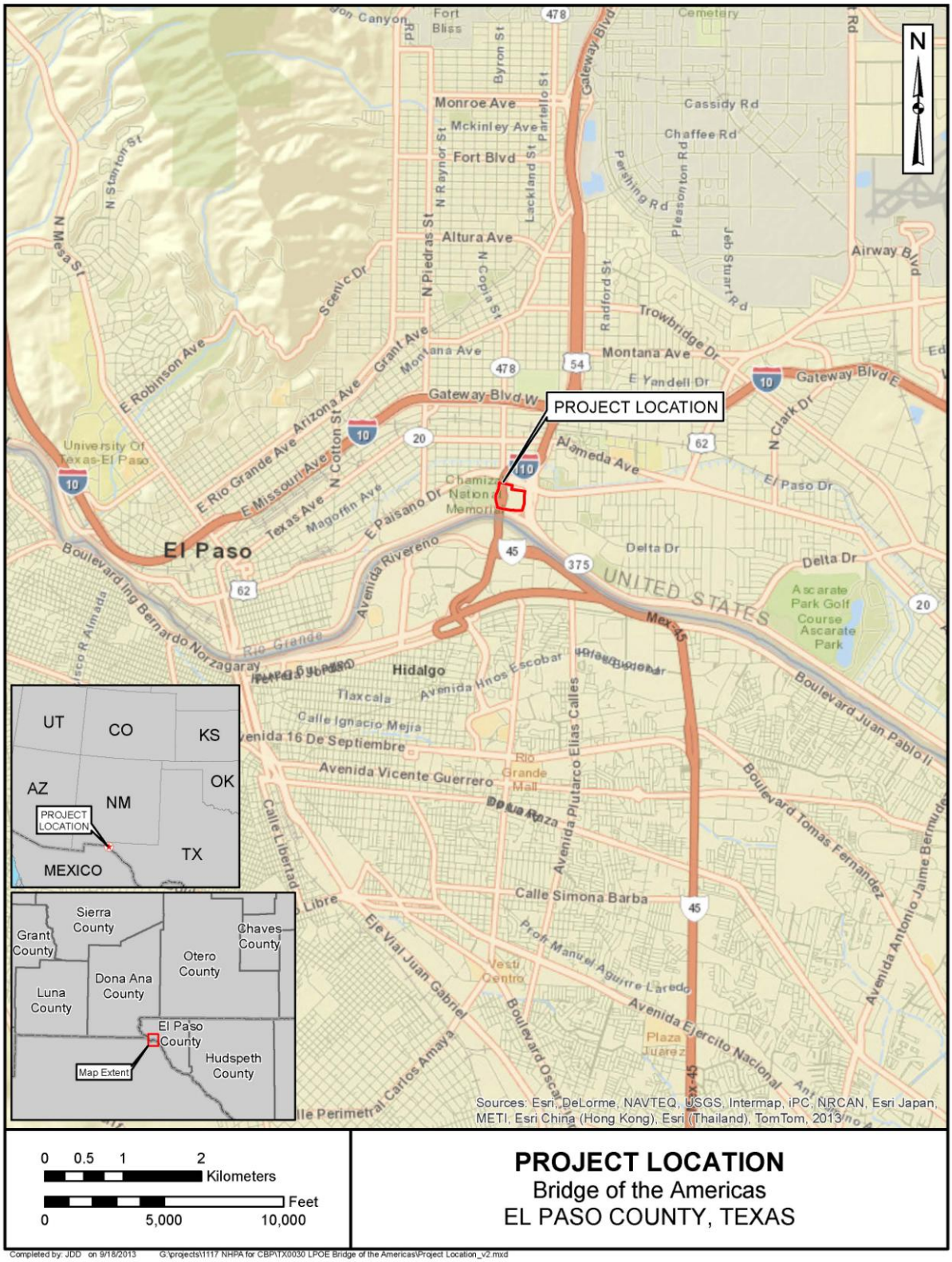
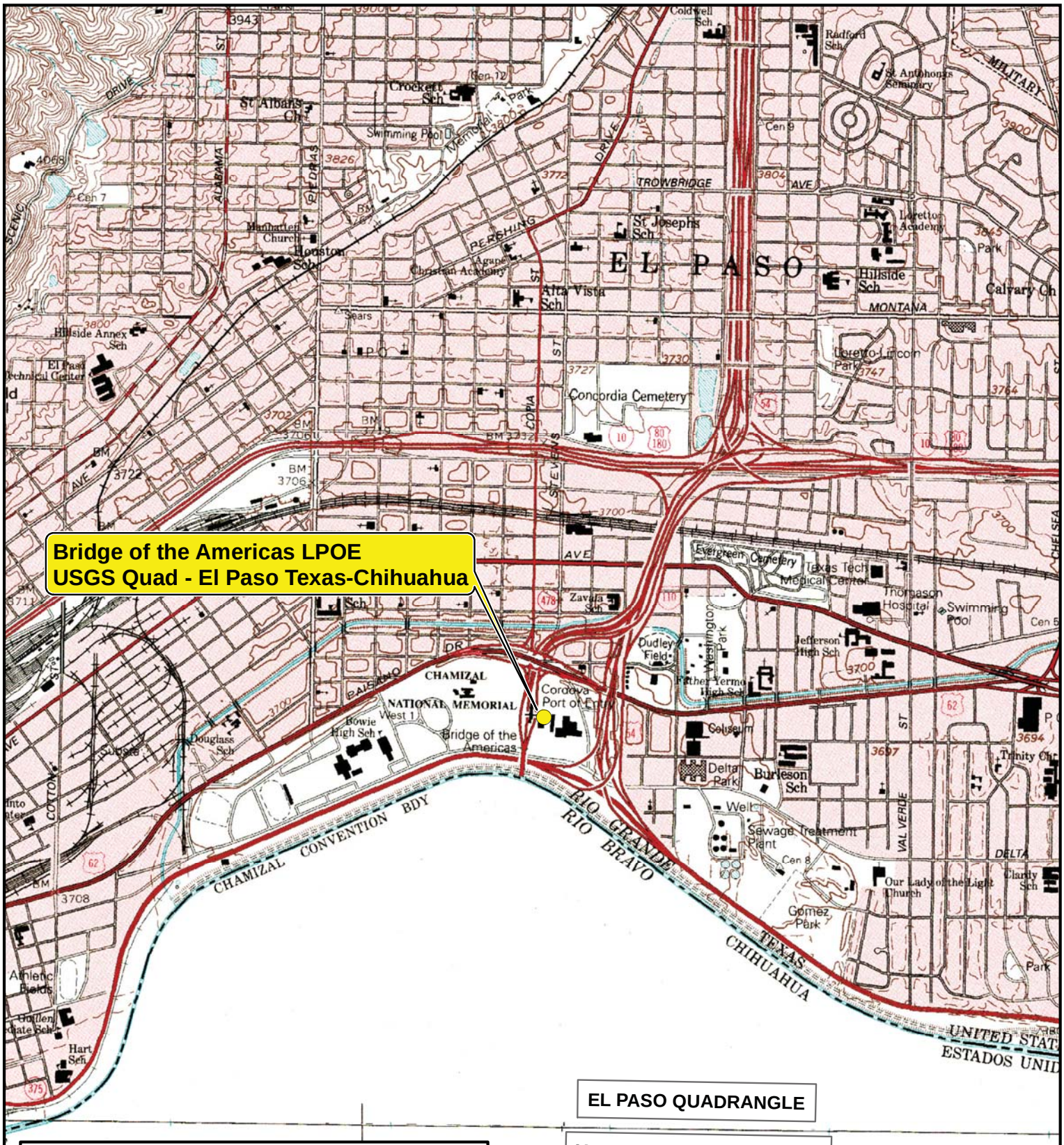


FIGURE 1. BRIDGE OF THE AMERICAS LPOE LOCATION MAP.



USGS 7.5' Topographic Quadrangles for El Paso and Ysleta NW, Texas-Chihuahua (1994)
Datum/Projection: NAD1927 UTM Zone 13N

FIGURE 2. BRIDGE OF THE AMERICAS LPOE LOCATION MAP.

FIGURE 3. BRIDGE OF THE AMERICAS LPOE AERIAL MAP.
The port covers about 28 acres and has fully developed property on three sides with an extensive highway system. The large park property to the left of Highway 110 is the Chamizal National Memorial.

GSA Public Buildings Service
Greater Southwest Region

28 April 2023

Chairwoman Lori Gooday Ware
Fort Sill Apache Tribe
43187 US Highway 281
Apache, OK 73006
Sent via email: lori.g.ware@fortsillapache-nsn.gov

Re: Initiation of Consultation Pursuant to 36 CFR 800
Bridge of the Americas Land Port of Entry, El Paso, Texas

Dear Chairwoman Gooday Ware,

The U.S. General Services Administration (GSA) is proposing to redevelop the Bridge of the America Land Port of Entry at 3600 E Paisano Drive, El Paso, Texas. On November 6, 2021, Congress passed the Bipartisan Infrastructure Law (BIL), also known as the Infrastructure Investment and Jobs Act (IIJA). On February 25, 2022, President Biden and GSA announced the list of major port projects funded by the BIL. This legislation included the Bridge of the Americas Land Port of Entry. The project proposes to address multiple deficiencies through replacing the port buildings and infrastructure with a new modernized and expanded facility. This includes potentially stacking port functions in a multi-level concept and acquiring new property next to port. Several options are currently being explored in an Enhanced Feasibility Study and are publicly available on GSA project website. Please see the links at the end of this letter for additional information.

Consultation Request:

In advance of selection of an option, we are seeking to initiate consultation pursuant to Section 106 of the National Historic Preservation Act (NHPA) regarding this undertaking in accordance with 36 CFR 800. It is GSA's goals to consult early with your office in our responsibility to comply with Section 106 and more specifically to identify historic properties potentially affected by GSA's undertakings, assess those effects, and seek ways to avoid or minimize adverse effects on historic properties.

We invite you to be a consulting party for this proposed project to help identify historic properties in the project area that may have religious and cultural significance to your Tribe, and if such properties exist, to help assess how the project might affect them. Please kindly advise us if you have an interest in this undertaking and would like to provide additional information for our consideration.

Facility Background:

The Bridge of the Americas Land Port of Entry was built in 1967. It is on the international border separating El Paso, Texas, and Ciudad Juarez, Chihuahua, Mexico (see Figures 1 and 2). This land port connects with the Mexican land port Cordova in Juarez. It is one of four crossings in El Paso. The LPOE covers approximately 28 acres and has fully developed property on three sides with an extensive highway system (see Figure 3). Being the only toll-free port of entry in

El Paso, an increase in truck and vehicular traffic over the last few years has created significant congestion making it difficult to support this increased volume of traffic. On an average day, over 600 commercial vehicles, 12,500 passenger vehicles, and 2,500 pedestrians use the port. Much of the port facility has reached the end of its life cycle as most of the buildings and infrastructure are operating at or beyond capacity and no longer meeting the U.S. Customs and Border Protection current design standards.

Cultural Resources:

There are no known buried cultural resources or historic buildings located at the port. However, a portion of the facility is located within the within the El Paso County Water Improvement District No. 1, a National Register Historic District. This district is recognized for architectural and engineering features associated with historic irrigation. In 2013, the U.S. Customs and Border Protection sponsored a comprehensive inventory of cultural resources present within the boundaries of the Bridge of the Americas LPOE facility. The property was pedestrian surveyed but found to be built over with structures and pavement. Only a few very small, landscaped areas were extant but identified as disturbed. Twelve buildings and structures were recorded during the architectural survey. Nine buildings and structures were constructed in 2009; the other 3 were built in the 1960s but were heavily altered in 2009.

Additional cultural resources studies are planned in support of the BIL project and will be conducted in coordination National Environmental Policy Act (NEPA) compliance and production of an Environmental Assessment (EA).

Area of Potential Effects and Studies:

Currently, the Area of Potential Effects (APE) for this undertaking includes the immediate property at the LPOE. Cultural resources studies will commence in support of the National Environmental Policy Act (NEPA) studies and in support of compliance with the Section 106 of the NHPA. At that time, GSA and our NEPA Cultural Resources consultant, will further evaluate and finalize the appropriate APE boundaries considering direct effects, visual effects, audible effects, and other indirect effects as part of their cultural resources' reconnaissance and assessments. It is expected that NEPA/NHPA studies will commence soon, and a final Environmental Assessment will be completed and available for review in 2023-2024.

Tribal Input:

We would respectfully request that you inform us if you have an interest in this project. Please include the name, appropriate tribal representative's contact information, and preferred means of communication. We are seeking responses within the required 30-day review period so that we can identify Tribes with an interest in this undertaking. Any requests provided after 30 days will be taken into consideration. We value your assistance and look forward to consulting further if there are historic properties of religious and cultural significance to your Tribe that may be affected by this undertaking.

Links to Additional Information:

- Bridge of Americans LPOE Project Website: https://www.gsa.gov/about-us/regions/region-7greater-southwest/buildings-and-facilities/texas/bridge-of-the-americas-land-port-of-entry

- Project Fact Sheet: https://www.gsa.gov/cdnstatic/Region%207%20BOTA%20External%20Fact%20Sheet%20REV041023.pdf
- Proposed Site Alternatives: https://www.gsa.gov/cdnstatic/Community%20Engagement%20%20Meeting%20Presentation.pdf

If you should have any questions, please do not hesitate to contact:

- Archeology and Historic Preservation Specialist, Victoria Clow: 817.233.9876 or victoria.clow@gsa.gov
- Regional Historic Preservation Officer, Hugo Gardea: 817.978-4229 or hugo.gardea@gsa.gov.

Very Respectfully,

Hugo A. Gardea
Regional Historic Preservation Officer (7PCD)

Attachments

CC: Beth Savage, GSA Federal Preservation Officer
Daniel Partida, GSA Project Manager
Karla Carmichael, GSA NEPA Manager

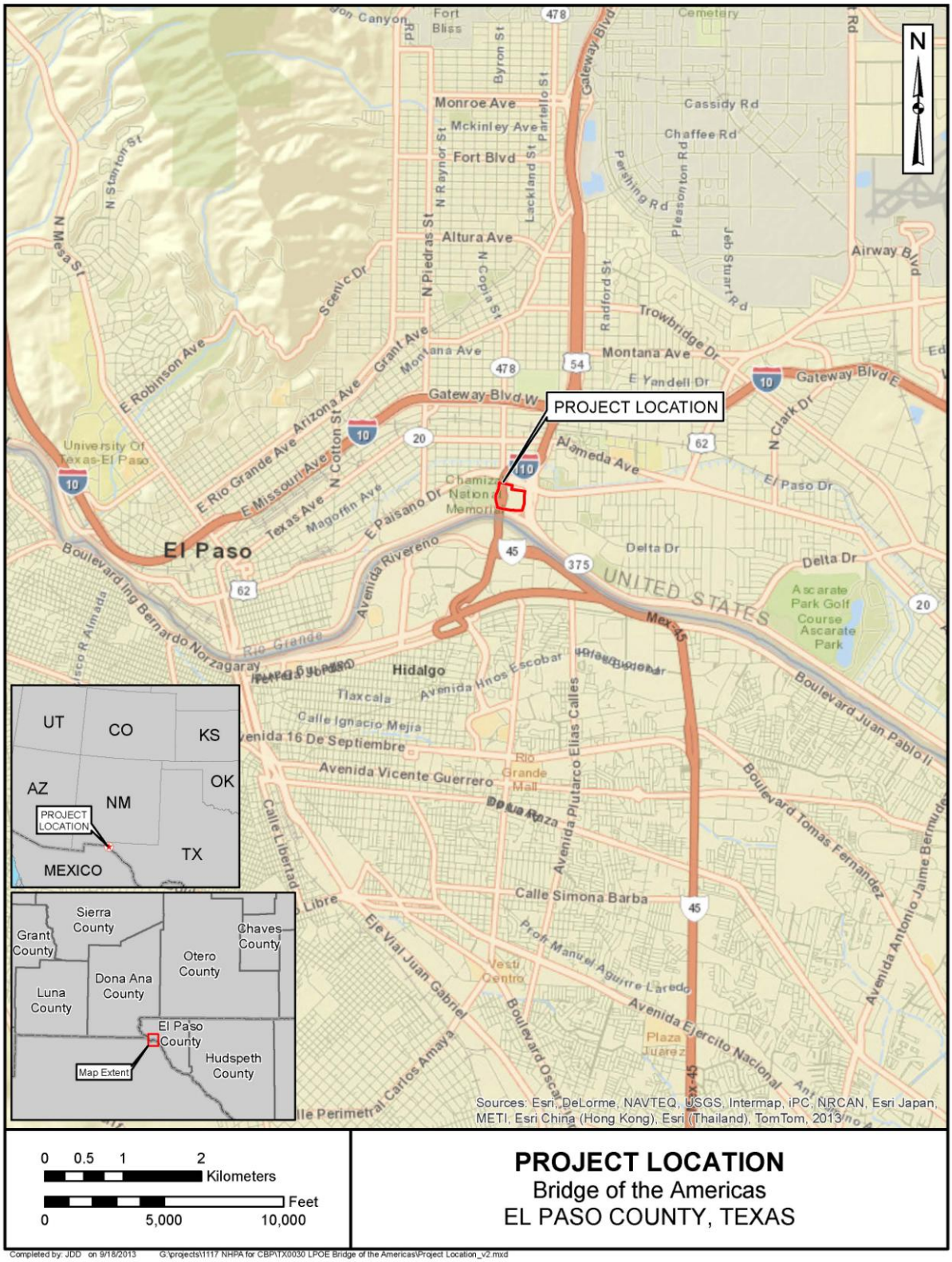
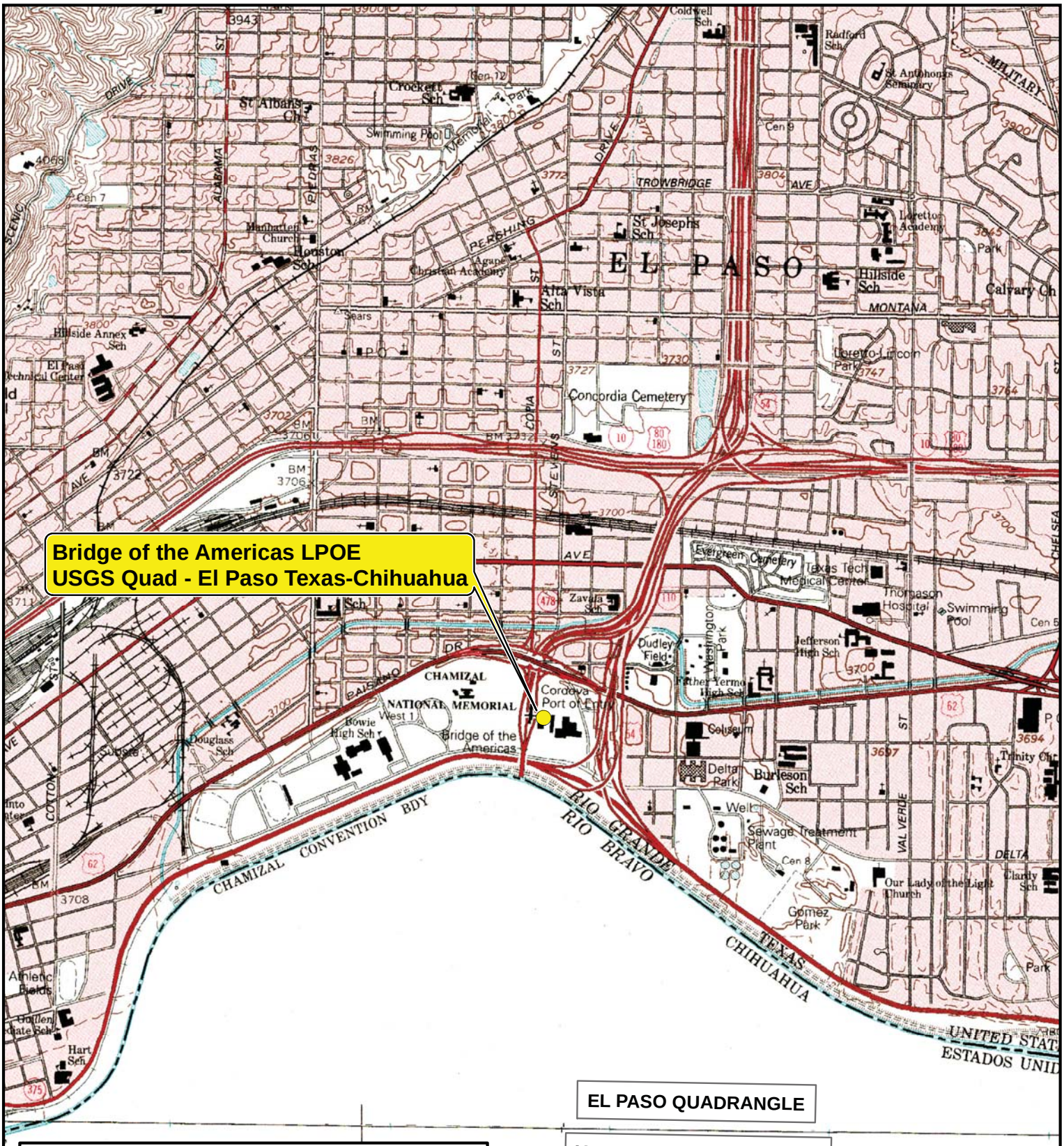


FIGURE 1. BRIDGE OF THE AMERICAS LPOE LOCATION MAP.



USGS 7.5' Topographic Quadrangles for El Paso and Ysleta NW, Texas-Chihuahua (1994)
Datum/Projection: NAD1927 UTM Zone 13N

FIGURE 2. BRIDGE OF THE AMERICAS LPOE LOCATION MAP.

FIGURE 3. BRIDGE OF THE AMERICAS LPOE AERIAL MAP.
The port covers about 28 acres and has fully developed property on three sides with an extensive highway system. The large park property to the left of Highway 110 is the Chamizal National Memorial.

GSA Public Buildings Service
Greater Southwest Region

28 April 2023

Holly Houghton
Tribal Historic Preservation Officer
Mescalero Apache Tribe
PO Box 227
Mescalero, NM 88340
Sent via email: holly@mathpo.org

Re: Initiation of Consultation Pursuant to 36 CFR 800
Bridge of the Americas Land Port of Entry, El Paso, Texas

Dear Ms. Houghton,

The U.S. General Services Administration (GSA) is proposing to redevelop the Bridge of the America Land Port of Entry at 3600 E Paisano Drive, El Paso, Texas. On November 6, 2021, Congress passed the Bipartisan Infrastructure Law (BIL), also known as the Infrastructure Investment and Jobs Act (IIJA). On February 25, 2022, President Biden and GSA announced the list of major port projects funded by the BIL. This legislation included the Bridge of the Americas Land Port of Entry. The project proposes to address multiple deficiencies through replacing the port buildings and infrastructure with a new modernized and expanded facility. This includes potentially stacking port functions in a multi-level concept and acquiring new property next to port. Several options are currently being explored in an Enhanced Feasibility Study and are publicly available on GSA project website. Please see the links at the end of this letter for additional information.

Consultation Request:

In advance of selection of an option, we are seeking to initiate consultation pursuant to Section 106 of the National Historic Preservation Act (NHPA) regarding this undertaking in accordance with 36 CFR 800. It is GSA's goals to consult early with your office in our responsibility to comply with Section 106 and more specifically to identify historic properties potentially affected by GSA's undertakings, assess those effects, and seek ways to avoid or minimize adverse effects on historic properties.

We invite you to be a consulting party for this proposed project to help identify historic properties in the project area that may have religious and cultural significance to your Tribe, and if such properties exist, to help assess how the project might affect them. Please kindly advise us if you have an interest in this undertaking and would like to provide additional information for our consideration.

Facility Background:

The Bridge of the Americas Land Port of Entry was built in 1967. It is on the international border separating El Paso, Texas, and Ciudad Juarez, Chihuahua, Mexico (see Figures 1 and 2). This land port connects with the Mexican land port Cordova in Juarez. It is one of four crossings in El Paso. The LPOE covers approximately 28 acres and has fully developed property on three

sides with an extensive highway system (see Figure 3). Being the only toll-free port of entry in El Paso, an increase in truck and vehicular traffic over the last few years has created significant congestion making it difficult to support this increased volume of traffic. On an average day, over 600 commercial vehicles, 12,500 passenger vehicles, and 2,500 pedestrians use the port. Much of the port facility has reached the end of its life cycle as most of the buildings and infrastructure are operating at or beyond capacity and no longer meeting the U.S. Customs and Border Protection current design standards.

Cultural Resources:

There are no known buried cultural resources or historic buildings located at the port. However, a portion of the facility is located within the within the El Paso County Water Improvement District No. 1, a National Register Historic District. This district is recognized for architectural and engineering features associated with historic irrigation. In 2013, the U.S. Customs and Border Protection sponsored a comprehensive inventory of cultural resources present within the boundaries of the Bridge of the Americas LPOE facility. The property was pedestrian surveyed but found to be built over with structures and pavement. Only a few very small, landscaped areas were extant but identified as disturbed. Twelve buildings and structures were recorded during the architectural survey. Nine buildings and structures were constructed in 2009; the other 3 were built in the 1960s but were heavily altered in 2009.

Additional cultural resources studies are planned in support of the BIL project and will be conducted in coordination National Environmental Policy Act (NEPA) compliance and production of an Environmental Assessment (EA).

Area of Potential Effects and Studies:

Currently, the Area of Potential Effects (APE) for this undertaking includes the immediate property at the LPOE. Cultural resources studies will commence in support of the National Environmental Policy Act (NEPA) studies and in support of compliance with the Section 106 of the NHPA. At that time, GSA and our NEPA Cultural Resources consultant, will further evaluate and finalize the appropriate APE boundaries considering direct effects, visual effects, audible effects, and other indirect effects as part of their cultural resources' reconnaissance and assessments. It is expected that NEPA/NHPA studies will commence soon, and a final Environmental Assessment will be completed and available for review in 2023-2024.

Tribal Input:

We would respectfully request that you inform us if you have an interest in this project. Please include the name, appropriate tribal representative's contact information, and preferred means of communication. We are seeking responses within the required 30-day review period so that we can identify Tribes with an interest in this undertaking. Any requests provided after 30 days will be taken into consideration. We value your assistance and look forward to consulting further if there are historic properties of religious and cultural significance to your Tribe that may be affected by this undertaking.

Links to Additional Information:

- Bridge of Americans LPOE Project Website: https://www.gsa.gov/about-us/regions/region-7greater-southwest/buildings-and-facilities/texas/bridge-of-the-americas-land-port-of-entry

- Project Fact Sheet: https://www.gsa.gov/cdnstatic/Region%207%20BOTA%20External%20Fact%20Sheet%20REV041023.pdf
- Proposed Site Alternatives: https://www.gsa.gov/cdnstatic/Community%20Engagement%20%20Meeting%20Presentation.pdf

If you should have any questions, please do not hesitate to contact:

- Archeology and Historic Preservation Specialist, Victoria Clow: 817.233.9876 or victoria.clow@gsa.gov
- Regional Historic Preservation Officer, Hugo Gardea: 817.978-4229 or hugo.gardea@gsa.gov.

Very Respectfully,

Hugo A. Gardea
Regional Historic Preservation Officer (7PCD)

Attachments

CC: Beth Savage, GSA Federal Preservation Officer
Daniel Partida, GSA Project Manager
Karla Carmichael, GSA NEPA Manager

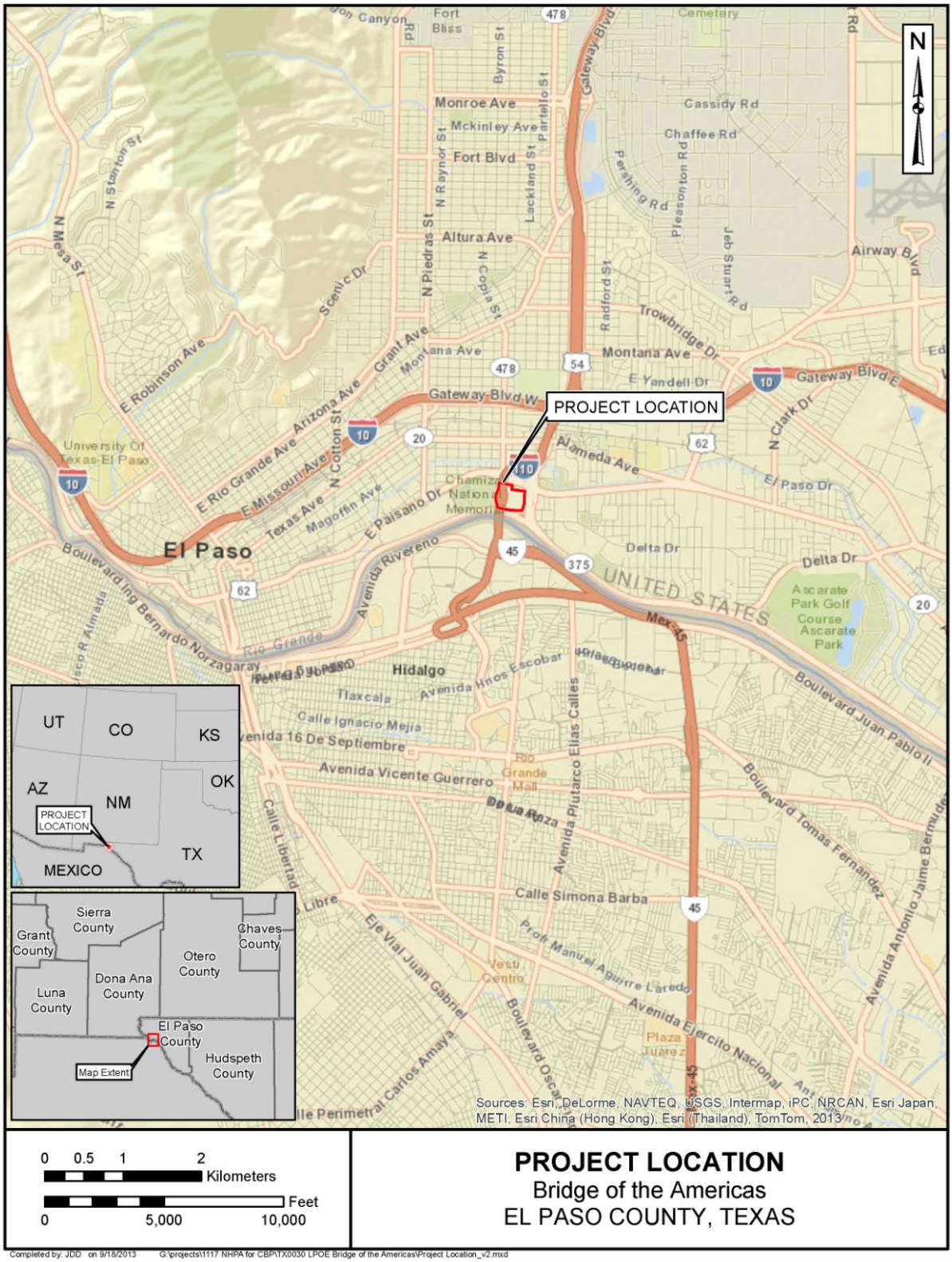
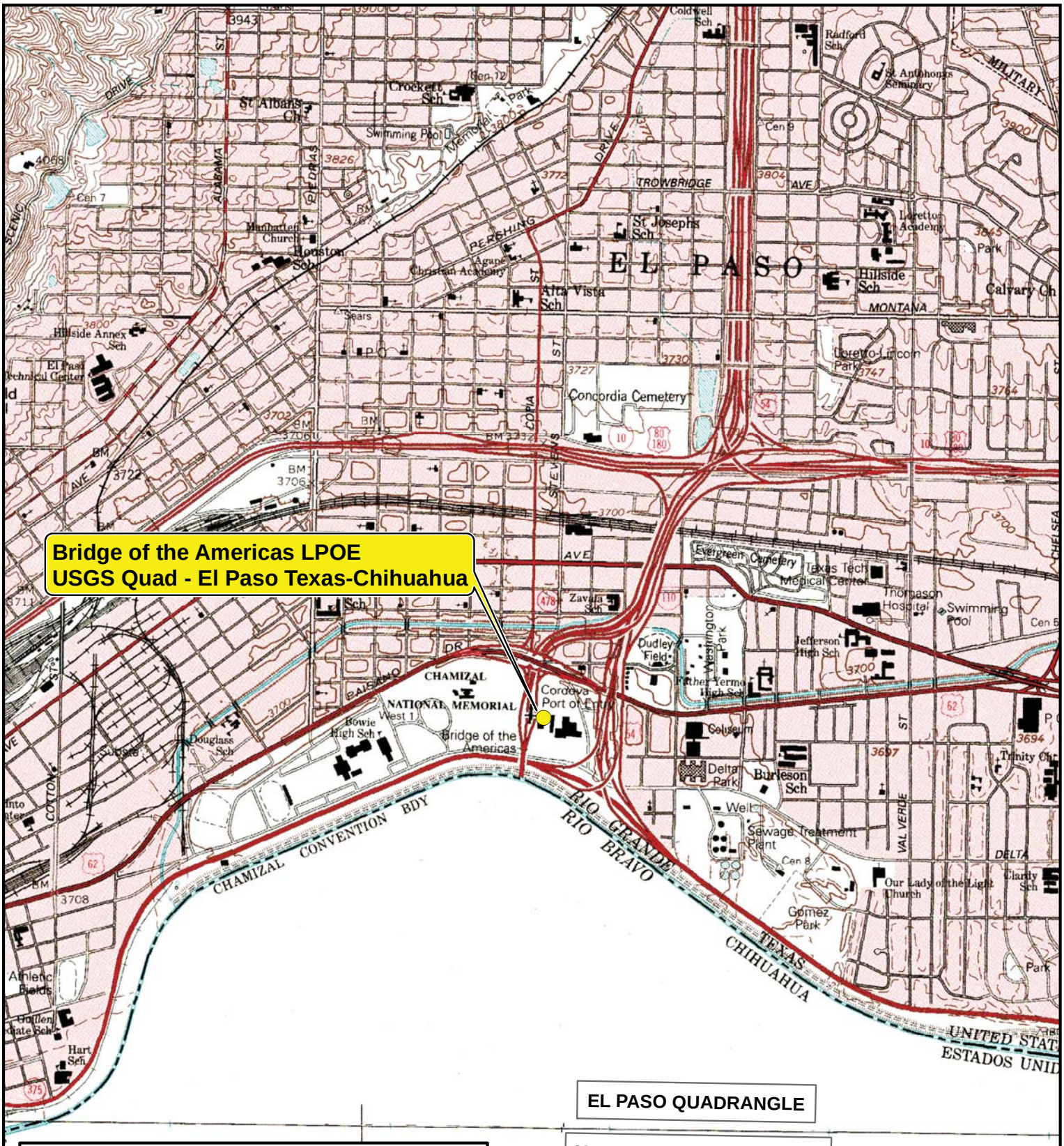


FIGURE 1. BRIDGE OF THE AMERICAS LPOE LOCATION MAP.



USGS 7.5' Topographic Quadrangles for El Paso and Ysleta NW, Texas-Chihuahua (1994)
Datum/Projection: NAD1927 UTM Zone 13N

FIGURE 2. BRIDGE OF THE AMERICAS LPOE LOCATION MAP.

FIGURE 3. BRIDGE OF THE AMERICAS LPOE AERIAL MAP.
The port covers about 28 acres and has fully developed property on three sides with an extensive highway system. The large park property to the left of Highway 110 is the Chamizal National Memorial.

GSA Public Buildings Service
Greater Southwest Region

28 April 2023

Lauren Norman-Brown
NAGPRA Coordinator, Consultant & Cultural Clerk
Tonkawa Tribe of Oklahoma
Rush Buffalo Road
Tonkawa, OK 74653
Sent via email: lbrown@tonkawatribe.com

Re: Initiation of Consultation Pursuant to 36 CFR 800
Bridge of the Americas Land Port of Entry, El Paso, Texas

Dear Ms. Norman-Brown,

The U.S. General Services Administration (GSA) is proposing to redevelop the Bridge of the America Land Port of Entry at 3600 E Paisano Drive, El Paso, Texas. On November 6, 2021, Congress passed the Bipartisan Infrastructure Law (BIL), also known as the Infrastructure Investment and Jobs Act (IIJA). On February 25, 2022, President Biden and GSA announced the list of major port projects funded by the BIL. This legislation included the Bridge of the Americas Land Port of Entry. The project proposes to address multiple deficiencies through replacing the port buildings and infrastructure with a new modernized and expanded facility. This includes potentially stacking port functions in a multi-level concept and acquiring new property next to port. Several options are currently being explored in an Enhanced Feasibility Study and are publicly available on GSA project website. Please see the links at the end of this letter for additional information.

Consultation Request:

In advance of selection of an option, we are seeking to initiate consultation pursuant to Section 106 of the National Historic Preservation Act (NHPA) regarding this undertaking in accordance with 36 CFR 800. It is GSA's goals to consult early with your office in our responsibility to comply with Section 106 and more specifically to identify historic properties potentially affected by GSA's undertakings, assess those effects, and seek ways to avoid or minimize adverse effects on historic properties.

We invite you to be a consulting party for this proposed project to help identify historic properties in the project area that may have religious and cultural significance to your Tribe, and if such properties exist, to help assess how the project might affect them. Please kindly advise us if you have an interest in this undertaking and would like to provide additional information for our consideration.

Facility Background:

The Bridge of the Americas Land Port of Entry was built in 1967. It is on the international border separating El Paso, Texas, and Ciudad Juarez, Chihuahua, Mexico (see Figures 1 and 2). This land port connects with the Mexican land port Cordova in Juarez. It is one of four crossings in El Paso. The LPOE covers approximately 28 acres and has fully developed property on three

sides with an extensive highway system (see Figure 3). Being the only toll-free port of entry in El Paso, an increase in truck and vehicular traffic over the last few years has created significant congestion making it difficult to support this increased volume of traffic. On an average day, over 600 commercial vehicles, 12,500 passenger vehicles, and 2,500 pedestrians use the port. Much of the port facility has reached the end of its life cycle as most of the buildings and infrastructure are operating at or beyond capacity and no longer meeting the U.S. Customs and Border Protection current design standards.

Cultural Resources:

There are no known buried cultural resources or historic buildings located at the port. However, a portion of the facility is located within the within the El Paso County Water Improvement District No. 1, a National Register Historic District. This district is recognized for architectural and engineering features associated with historic irrigation. In 2013, the U.S. Customs and Border Protection sponsored a comprehensive inventory of cultural resources present within the boundaries of the Bridge of the Americas LPOE facility. The property was pedestrian surveyed but found to be built over with structures and pavement. Only a few very small, landscaped areas were extant but identified as disturbed. Twelve buildings and structures were recorded during the architectural survey. Nine buildings and structures were constructed in 2009; the other 3 were built in the 1960s but were heavily altered in 2009.

Additional cultural resources studies are planned in support of the BIL project and will be conducted in coordination National Environmental Policy Act (NEPA) compliance and production of an Environmental Assessment (EA).

Area of Potential Effects and Studies:

Currently, the Area of Potential Effects (APE) for this undertaking includes the immediate property at the LPOE. Cultural resources studies will commence in support of the National Environmental Policy Act (NEPA) studies and in support of compliance with the Section 106 of the NHPA. At that time, GSA and our NEPA Cultural Resources consultant, will further evaluate and finalize the appropriate APE boundaries considering direct effects, visual effects, audible effects, and other indirect effects as part of their cultural resources' reconnaissance and assessments. It is expected that NEPA/NHPA studies will commence soon, and a final Environmental Assessment will be completed and available for review in 2023-2024.

Tribal Input:

We would respectfully request that you inform us if you have an interest in this project. Please include the name, appropriate tribal representative's contact information, and preferred means of communication. We are seeking responses within the required 30-day review period so that we can identify Tribes with an interest in this undertaking. Any requests provided after 30 days will be taken into consideration. We value your assistance and look forward to consulting further if there are historic properties of religious and cultural significance to your Tribe that may be affected by this undertaking.

Links to Additional Information:

- Bridge of Americans LPOE Project Website: https://www.gsa.gov/about-us/regions/region-7greater-southwest/buildings-and-facilities/texas/bridge-of-the-americas-land-port-of-entry

- Project Fact Sheet: https://www.gsa.gov/cdnstatic/Region%207%20BOTA%20External%20Fact%20Sheet%20REV041023.pdf
- Proposed Site Alternatives: https://www.gsa.gov/cdnstatic/Community%20Engagement%20%20Meeting%20Presentation.pdf

If you should have any questions, please do not hesitate to contact:

- Archeology and Historic Preservation Specialist, Victoria Clow: 817.233.9876 or victoria.clow@gsa.gov
- Regional Historic Preservation Officer, Hugo Gardea: 817.978-4229 or hugo.gardea@gsa.gov.

Very Respectfully,

Hugo A. Gardea
Regional Historic Preservation Officer (7PCD)

Attachments

CC: Beth Savage, GSA Federal Preservation Officer
Daniel Partida, GSA Project Manager
Karla Carmichael, GSA NEPA Manager

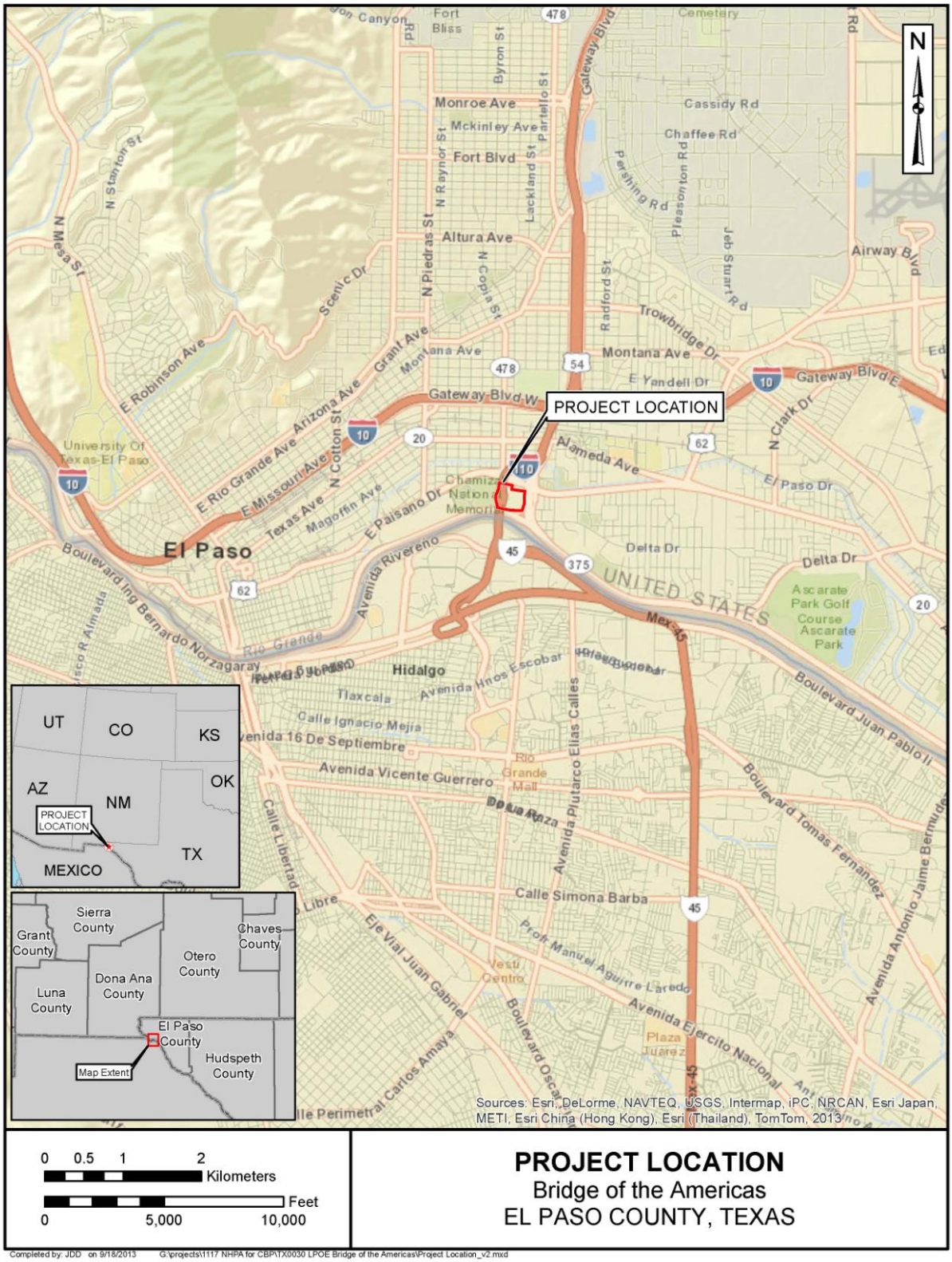
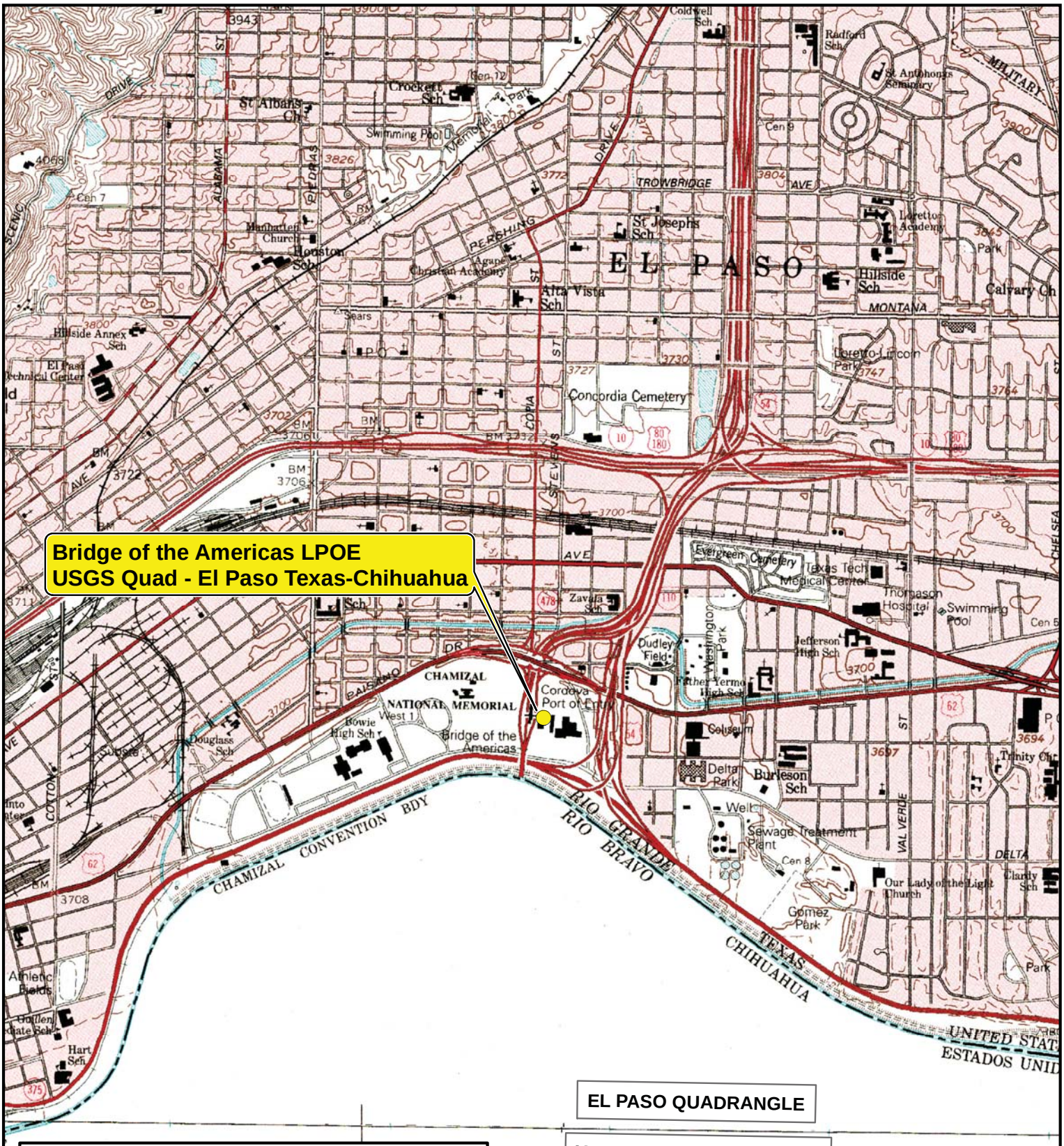


FIGURE 1. BRIDGE OF THE AMERICAS LPOE LOCATION MAP.



USGS 7.5' Topographic Quadrangles for El Paso and Ysleta NW, Texas-Chihuahua (1994)
Datum/Projection: NAD1927 UTM Zone 13N

FIGURE 2. BRIDGE OF THE AMERICAS LPOE LOCATION MAP.

FIGURE 3. BRIDGE OF THE AMERICAS LPOE AERIAL MAP.
The port covers about 28 acres and has fully developed property on three sides with an extensive highway system. The large park property to the left of Highway 110 is the Chamizal National Memorial.

GSA Public Buildings Service
Greater Southwest Region

28 April 2023

White Mountain Apache Tribe
Mr. Mark Altaha, THPO
P.O. Box 1032
Fort Apache, AZ 85926
Phone: (928) 338-3033
Sent via email: markaltaha@wmat.nsn.us

Re: Initiation of Consultation Pursuant to 36 CFR 800
Bridge of the Americas Land Port of Entry, El Paso, Texas

Dear Mr. Altaha,

The U.S. General Services Administration (GSA) is proposing to redevelop the Bridge of the America Land Port of Entry at 3600 E Paisano Drive, El Paso, Texas. On November 6, 2021, Congress passed the Bipartisan Infrastructure Law (BIL), also known as the Infrastructure Investment and Jobs Act (IIJA). On February 25, 2022, President Biden and GSA announced the list of major port projects funded by the BIL. This legislation included the Bridge of the Americas Land Port of Entry. The project proposes to address multiple deficiencies through replacing the port buildings and infrastructure with a new modernized and expanded facility. This includes potentially stacking port functions in a multi-level concept and acquiring new property next to port. Several options are currently being explored in an Enhanced Feasibility Study and are publicly available on GSA project website. Please see the links at the end of this letter for additional information.

Consultation Request:

In advance of selection of an option, we are seeking to initiate consultation pursuant to Section 106 of the National Historic Preservation Act (NHPA) regarding this undertaking in accordance with 36 CFR 800. It is GSA's goals to consult early with your office in our responsibility to comply with Section 106 and more specifically to identify historic properties potentially affected by GSA's undertakings, assess those effects, and seek ways to avoid or minimize adverse effects on historic properties.

We invite you to be a consulting party for this proposed project to help identify historic properties in the project area that may have religious and cultural significance to your Tribe, and if such properties exist, to help assess how the project might affect them. Please kindly advise us if you have an interest in this undertaking and would like to provide additional information for our consideration.

Facility Background:

The Bridge of the Americas Land Port of Entry was built in 1967. It is on the international border separating El Paso, Texas, and Ciudad Juarez, Chihuahua, Mexico (see Figures 1 and 2). This land port connects with the Mexican land port Cordova in Juarez. It is one of four crossings in El Paso. The LPOE covers approximately 28 acres and has fully developed property on three

sides with an extensive highway system (see Figure 3). Being the only toll-free port of entry in El Paso, an increase in truck and vehicular traffic over the last few years has created significant congestion making it difficult to support this increased volume of traffic. On an average day, over 600 commercial vehicles, 12,500 passenger vehicles, and 2,500 pedestrians use the port. Much of the port facility has reached the end of its life cycle as most of the buildings and infrastructure are operating at or beyond capacity and no longer meeting the U.S. Customs and Border Protection current design standards.

Cultural Resources:

There are no known buried cultural resources or historic buildings located at the port. However, a portion of the facility is located within the within the El Paso County Water Improvement District No. 1, a National Register Historic District. This district is recognized for architectural and engineering features associated with historic irrigation. In 2013, the U.S. Customs and Border Protection sponsored a comprehensive inventory of cultural resources present within the boundaries of the Bridge of the Americas LPOE facility. The property was pedestrian surveyed but found to be built over with structures and pavement. Only a few very small, landscaped areas were extant but identified as disturbed. Twelve buildings and structures were recorded during the architectural survey. Nine buildings and structures were constructed in 2009; the other 3 were built in the 1960s but were heavily altered in 2009.

Additional cultural resources studies are planned in support of the BIL project and will be conducted in coordination National Environmental Policy Act (NEPA) compliance and production of an Environmental Assessment (EA).

Area of Potential Effects and Studies:

Currently, the Area of Potential Effects (APE) for this undertaking includes the immediate property at the LPOE. Cultural resources studies will commence in support of the National Environmental Policy Act (NEPA) studies and in support of compliance with the Section 106 of the NHPA. At that time, GSA and our NEPA Cultural Resources consultant, will further evaluate and finalize the appropriate APE boundaries considering direct effects, visual effects, audible effects, and other indirect effects as part of their cultural resources' reconnaissance and assessments. It is expected that NEPA/NHPA studies will commence soon, and a final Environmental Assessment will be completed and available for review in 2023-2024.

Tribal Input:

We would respectfully request that you inform us if you have an interest in this project. Please include the name, appropriate tribal representative's contact information, and preferred means of communication. We are seeking responses within the required 30-day review period so that we can identify Tribes with an interest in this undertaking. Any requests provided after 30 days will be taken into consideration. We value your assistance and look forward to consulting further if there are historic properties of religious and cultural significance to your Tribe that may be affected by this undertaking.

Links to Additional Information:

- Bridge of Americans LPOE Project Website: https://www.gsa.gov/about-us/regions/region-7greater-southwest/buildings-and-facilities/texas/bridge-of-the-americas-land-port-of-entry

- Project Fact Sheet: https://www.gsa.gov/cdnstatic/Region%207%20BOTA%20External%20Fact%20Sheet%20REV041023.pdf
- Proposed Site Alternatives: https://www.gsa.gov/cdnstatic/Community%20Engagement%20%20Meeting%20Presentation.pdf

If you should have any questions, please do not hesitate to contact:

- Archeology and Historic Preservation Specialist, Victoria Clow: 817.233.9876 or victoria.clow@gsa.gov
- Regional Historic Preservation Officer, Hugo Gardea: 817.978-4229 or hugo.gardea@gsa.gov.

Very Respectfully,

Hugo A. Gardea
Regional Historic Preservation Officer (7PCD)

Attachments

CC: Beth Savage, GSA Federal Preservation Officer
Daniel Partida, GSA Project Manager
Karla Carmichael, GSA NEPA Manager

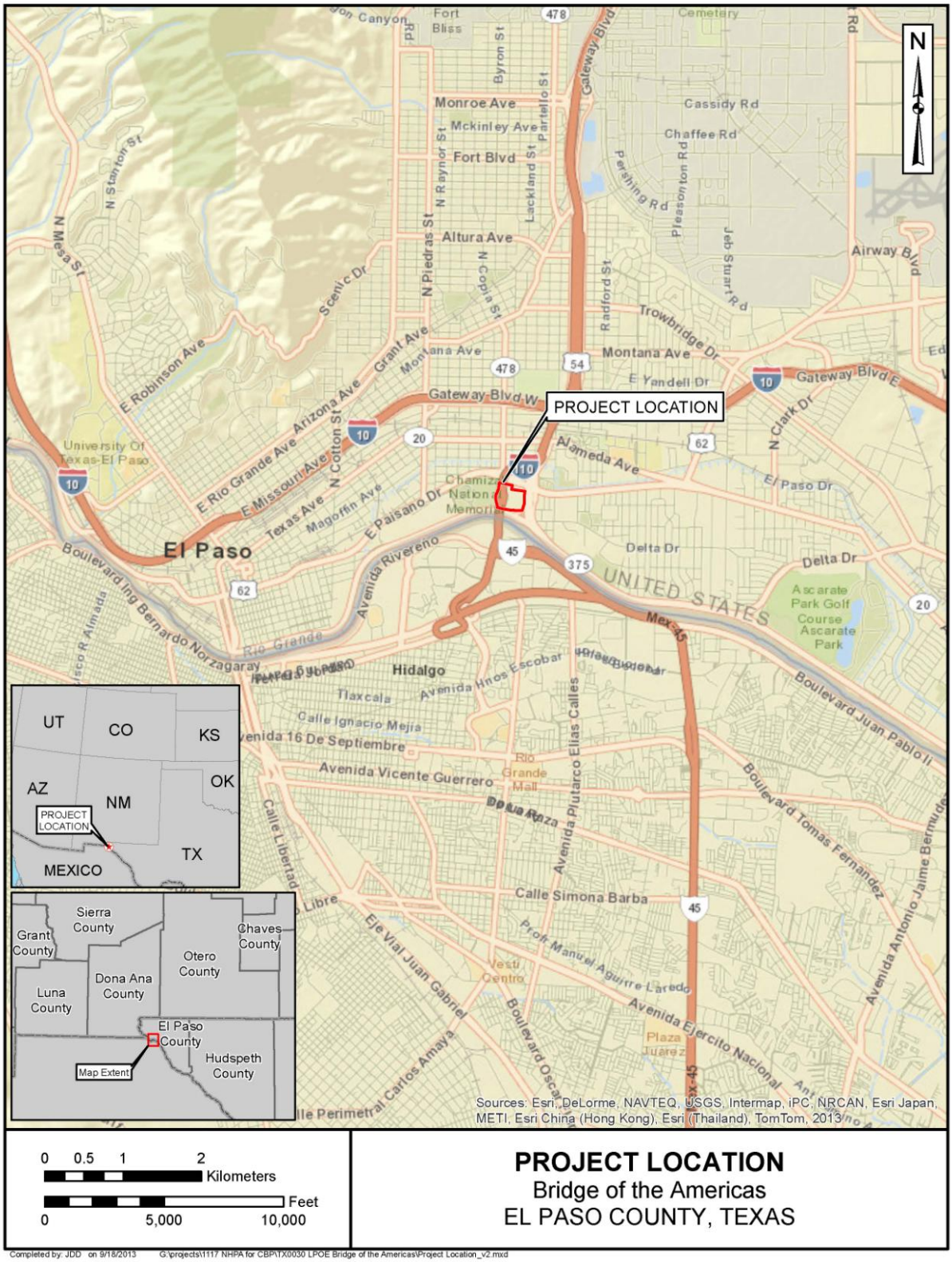
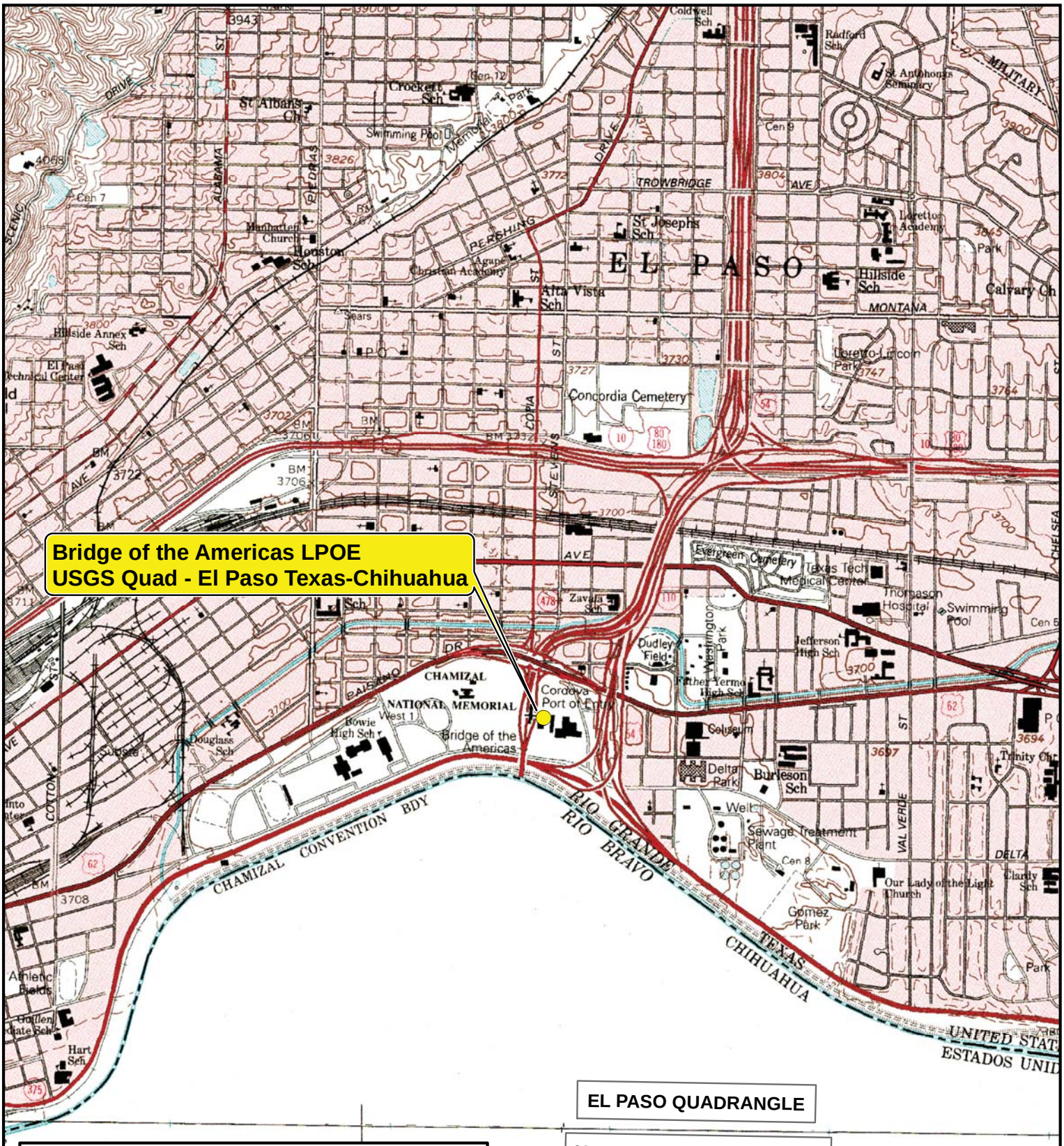


FIGURE 1. BRIDGE OF THE AMERICAS LPOE LOCATION MAP.



USGS 7.5' Topographic Quadrangles for El Paso and Ysleta NW, Texas-Chihuahua (1994)
Datum/Projection: NAD1927 UTM Zone 13N

FIGURE 2. BRIDGE OF THE AMERICAS LPOE LOCATION MAP.

FIGURE 3. BRIDGE OF THE AMERICAS LPOE AERIAL MAP.
The port covers about 28 acres and has fully developed property on three sides with an extensive highway system. The large park property to the left of Highway 110 is the Chamizal National Memorial.

White Mountain Apache Tribe

Office of Historic Preservation
PO Box 1032
Fort Apache, AZ 85926
Ph: (928) 338-3033 Fax: (928) 338-6055

-

To: Hugo A. Gardea – GSA Regional Historic Preservation Officer

Date: May 31, 2023

Re: *Bridge of the Americas Land Port of Entry, El Paso, Texas*

……

The White Mountain Apache Tribe Historic Preservation Office appreciates receiving information on the project dated; April 28, 2023. In regards to this, please refer to the following statement(s) below.

Thank you for allowing the White Mountain Apache tribe the opportunity to review and respond to the above proposed redevelopment of the Bridge of the America Land Port of Entry at 3600 E. Paisano Drive, in El Paso, Texas.

Please be advised, we have reviewed the consultation letter and the information provided, we have reviewed the information provided and determined the proposed project will have a ***"No Adverse Effect"*** on the tribe traditional cultural properties and/or historic properties.

Thank you for early tribal engagement and consultation, and continued collaborations in protecting and preserving places of cultural and historical importance.

Sincerely,

Mark Altaha

White Mountain Apache Tribe – THPO
Historic Preservation Office

GSA Public Buildings Service
Greater Southwest Region

28 April 2023

Mr. Gary McAdams, THPO
Ms. Mary Botone, Section 106
Tribal Historic Preservation Office
Wichita and Affiliated Tribes
P.O. Box 729
Anadarko, OK 73005
Sent via email: gary.mcadams@wichitatribe.com and mary.botone@wichitatribe.com

Re: Initiation of Consultation Pursuant to 36 CFR 800
Bridge of the Americas Land Port of Entry, El Paso, Texas

Dear Mr. McAdams and Ms. Botone,

The U.S. General Services Administration (GSA) is proposing to redevelop the Bridge of the America Land Port of Entry at 3600 E Paisano Drive, El Paso, Texas. On November 6, 2021, Congress passed the Bipartisan Infrastructure Law (BIL), also known as the Infrastructure Investment and Jobs Act (IIJA). On February 25, 2022, President Biden and GSA announced the list of major port projects funded by the BIL. This legislation included the Bridge of the Americas Land Port of Entry. The project proposes to address multiple deficiencies through replacing the port buildings and infrastructure with a new modernized and expanded facility. This includes potentially stacking port functions in a multi-level concept and acquiring new property next to port. Several options are currently being explored in an Enhanced Feasibility Study and are publicly available on GSA project website. Please see the links at the end of this letter for additional information.

Consultation Request:

In advance of selection of an option, we are seeking to initiate consultation pursuant to Section 106 of the National Historic Preservation Act (NHPA) regarding this undertaking in accordance with 36 CFR 800. It is GSA's goals to consult early with your office in our responsibility to comply with Section 106 and more specifically to identify historic properties potentially affected by GSA's undertakings, assess those effects, and seek ways to avoid or minimize adverse effects on historic properties.

We invite you to be a consulting party for this proposed project to help identify historic properties in the project area that may have religious and cultural significance to your Tribe, and if such properties exist, to help assess how the project might affect them. Please kindly advise us if you have an interest in this undertaking and would like to provide additional information for our consideration.

Facility Background:

The Bridge of the Americas Land Port of Entry was built in 1967. It is on the international border separating El Paso, Texas, and Ciudad Juarez, Chihuahua, Mexico (see Figures 1 and 2). This land port connects with the Mexican land port Cordova in Juarez. It is one of four crossings in

El Paso. The LPOE covers approximately 28 acres and has fully developed property on three sides with an extensive highway system (see Figure 3). Being the only toll-free port of entry in El Paso, an increase in truck and vehicular traffic over the last few years has created significant congestion making it difficult to support this increased volume of traffic. On an average day, over 600 commercial vehicles, 12,500 passenger vehicles, and 2,500 pedestrians use the port. Much of the port facility has reached the end of its life cycle as most of the buildings and infrastructure are operating at or beyond capacity and no longer meeting the U.S. Customs and Border Protection current design standards.

Cultural Resources:

There are no known buried cultural resources or historic buildings located at the port. However, a portion of the facility is located within the within the El Paso County Water Improvement District No. 1, a National Register Historic District. This district is recognized for architectural and engineering features associated with historic irrigation. In 2013, the U.S. Customs and Border Protection sponsored a comprehensive inventory of cultural resources present within the boundaries of the Bridge of the Americas LPOE facility. The property was pedestrian surveyed but found to be built over with structures and pavement. Only a few very small, landscaped areas were extant but identified as disturbed. Twelve buildings and structures were recorded during the architectural survey. Nine buildings and structures were constructed in 2009; the other 3 were built in the 1960s but were heavily altered in 2009.

Additional cultural resources studies are planned in support of the BIL project and will be conducted in coordination National Environmental Policy Act (NEPA) compliance and production of an Environmental Assessment (EA).

Area of Potential Effects and Studies:

Currently, the Area of Potential Effects (APE) for this undertaking includes the immediate property at the LPOE. Cultural resources studies will commence in support of the National Environmental Policy Act (NEPA) studies and in support of compliance with the Section 106 of the NHPA. At that time, GSA and our NEPA Cultural Resources consultant, will further evaluate and finalize the appropriate APE boundaries considering direct effects, visual effects, audible effects, and other indirect effects as part of their cultural resources' reconnaissance and assessments. It is expected that NEPA/NHPA studies will commence soon, and a final Environmental Assessment will be completed and available for review in 2023-2024.

Tribal Input:

We would respectfully request that you inform us if you have an interest in this project. Please include the name, appropriate tribal representative's contact information, and preferred means of communication. We are seeking responses within the required 30-day review period so that we can identify Tribes with an interest in this undertaking. Any requests provided after 30 days will be taken into consideration. We value your assistance and look forward to consulting further if there are historic properties of religious and cultural significance to your Tribe that may be affected by this undertaking.

Links to Additional Information:

- Bridge of Americans LPOE Project Website: https://www.gsa.gov/about-us/regions/region-7greater-southwest/buildings-and-facilities/texas/bridge-of-the-americas-land-port-of-entry
- Project Fact Sheet: https://www.gsa.gov/cdnstatic/Region%207%20BOTA%20External%20Fact%20Sheet%20REV041023.pdf
- Proposed Site Alternatives: https://www.gsa.gov/cdnstatic/Community%20Engagement%20%20Meeting%20Presentation.pdf

If you should have any questions, please do not hesitate to contact:

- Archeology and Historic Preservation Specialist, Victoria Clow: 817.233.9876 or victoria.clow@gsa.gov
- Regional Historic Preservation Officer, Hugo Gardea: 817.978-4229 or hugo.gardea@gsa.gov.

Very Respectfully,

Hugo A. Gardea
Regional Historic Preservation Officer (7PCD)

Attachments

CC: Beth Savage, GSA Federal Preservation Officer
Daniel Partida, GSA Project Manager
Karla Carmichael, GSA NEPA Manager

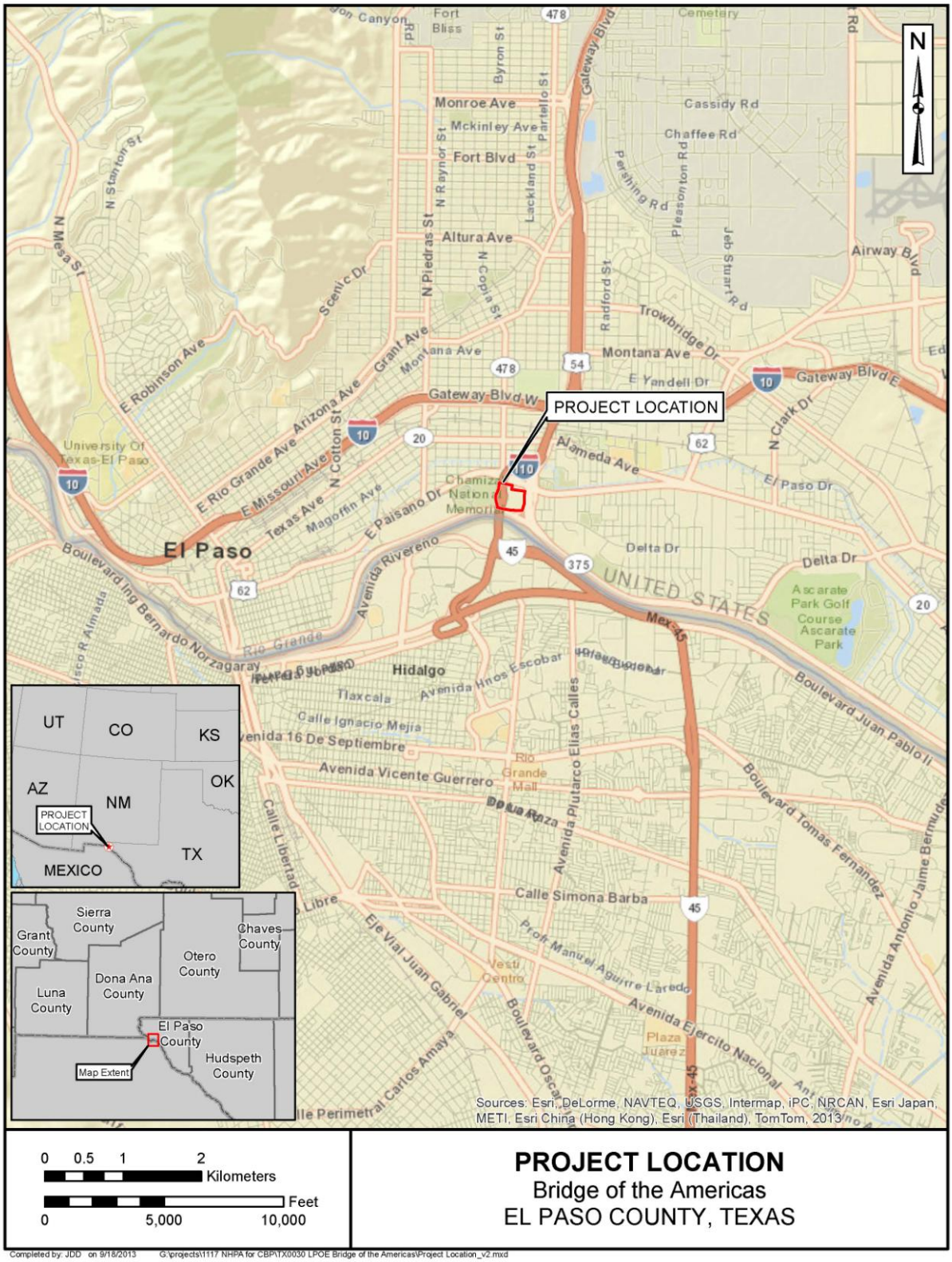
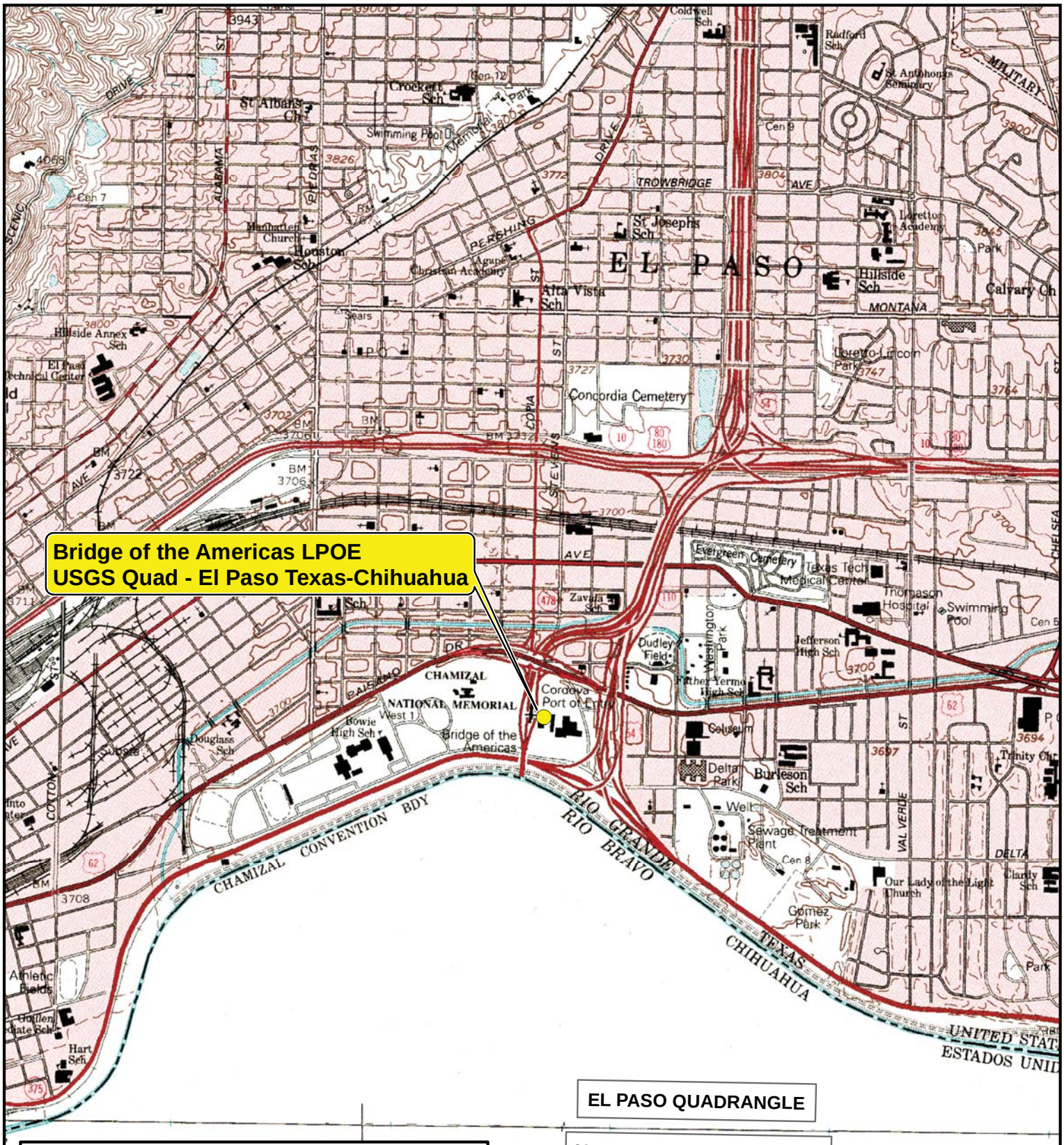


FIGURE 1. BRIDGE OF THE AMERICAS LPOE LOCATION MAP.



USGS 7.5' Topographic Quadrangles for El Paso and Ysleta NW, Texas-Chihuahua (1994)
Datum/Projection: NAD1927 UTM Zone 13N

FIGURE 2. BRIDGE OF THE AMERICAS LPOE LOCATION MAP.

FIGURE 3. BRIDGE OF THE AMERICAS LPOE AERIAL MAP.
The port covers about 28 acres and has fully developed property on three sides with an extensive highway system. The large park property to the left of Highway 110 is the Chamizal National Memorial.

GSA Public Buildings Service
Greater Southwest Region

28 April 2023

Mr. Rene Lopez, War Captain and THPO
Ysleta Del Sur Pueblo of Texas
119 South Old Pueblo
El Paso, TX 79907
Sent via email: Rene Lopez, lopezr@ydsp-nsn.gov

Re: Initiation of Consultation Pursuant to 36 CFR 800
Bridge of the Americas Land Port of Entry, El Paso, Texas

Dear Mr. Lopez,

The U.S. General Services Administration (GSA) is proposing to redevelop the Bridge of the America Land Port of Entry at 3600 E Paisano Drive, El Paso, Texas. On November 6, 2021, Congress passed the Bipartisan Infrastructure Law (BIL), also known as the Infrastructure Investment and Jobs Act (IIJA). On February 25, 2022, President Biden and GSA announced the list of major port projects funded by the BIL. This legislation included the Bridge of the Americas Land Port of Entry. The project proposes to address multiple deficiencies through replacing the port buildings and infrastructure with a new modernized and expanded facility. This includes potentially stacking port functions in a multi-level concept and acquiring new property next to port. Several options are currently being explored in an Enhanced Feasibility Study and are publicly available on GSA project website. Please see the links at the end of this letter for additional information.

Consultation Request:

In advance of selection of an option, we are seeking to initiate consultation pursuant to Section 106 of the National Historic Preservation Act (NHPA) regarding this undertaking in accordance with 36 CFR 800. It is GSA's goals to consult early with your office in our responsibility to comply with Section 106 and more specifically to identify historic properties potentially affected by GSA's undertakings, assess those effects, and seek ways to avoid or minimize adverse effects on historic properties.

We invite you to be a consulting party for this proposed project to help identify historic properties in the project area that may have religious and cultural significance to your Tribe, and if such properties exist, to help assess how the project might affect them. Please kindly advise us if you have an interest in this undertaking and would like to provide additional information for our consideration.

Facility Background:

The Bridge of the Americas Land Port of Entry was built in 1967. It is on the international border separating El Paso, Texas, and Ciudad Juarez, Chihuahua, Mexico (see Figures 1 and 2). This land port connects with the Mexican land port Cordova in Juarez. It is one of four crossings in El Paso. The LPOE covers approximately 28 acres and has fully developed property on three sides with an extensive highway system (see Figure 3). Being the only toll-free port of entry in

El Paso, an increase in truck and vehicular traffic over the last few years has created significant congestion making it difficult to support this increased volume of traffic. On an average day, over 600 commercial vehicles, 12,500 passenger vehicles, and 2,500 pedestrians use the port. Much of the port facility has reached the end of its life cycle as most of the buildings and infrastructure are operating at or beyond capacity and no longer meeting the U.S. Customs and Border Protection current design standards.

Cultural Resources:

There are no known buried cultural resources or historic buildings located at the port. However, a portion of the facility is located within the within the El Paso County Water Improvement District No. 1, a National Register Historic District. This district is recognized for architectural and engineering features associated with historic irrigation. In 2013, the U.S. Customs and Border Protection sponsored a comprehensive inventory of cultural resources present within the boundaries of the Bridge of the Americas LPOE facility. The property was pedestrian surveyed but found to be built over with structures and pavement. Only a few very small, landscaped areas were extant but identified as disturbed. Twelve buildings and structures were recorded during the architectural survey. Nine buildings and structures were constructed in 2009; the other 3 were built in the 1960s but were heavily altered in 2009.

Additional cultural resources studies are planned in support of the BIL project and will be conducted in coordination National Environmental Policy Act (NEPA) compliance and production of an Environmental Assessment (EA).

Area of Potential Effects and Studies:

Currently, the Area of Potential Effects (APE) for this undertaking includes the immediate property at the LPOE. Cultural resources studies will commence in support of the National Environmental Policy Act (NEPA) studies and in support of compliance with the Section 106 of the NHPA. At that time, GSA and our NEPA Cultural Resources consultant, will further evaluate and finalize the appropriate APE boundaries considering direct effects, visual effects, audible effects, and other indirect effects as part of their cultural resources' reconnaissance and assessments. It is expected that NEPA/NHPA studies will commence soon, and a final Environmental Assessment will be completed and available for review in 2023-2024.

Tribal Input:

We would respectfully request that you inform us if you have an interest in this project. Please include the name, appropriate tribal representative's contact information, and preferred means of communication. We are seeking responses within the required 30-day review period so that we can identify Tribes with an interest in this undertaking. Any requests provided after 30 days will be taken into consideration. We value your assistance and look forward to consulting further if there are historic properties of religious and cultural significance to your Tribe that may be affected by this undertaking.

Links to Additional Information:

- Bridge of Americans LPOE Project Website: https://www.gsa.gov/about-us/regions/region-7greater-southwest/buildings-and-facilities/texas/bridge-of-the-americas-land-port-of-entry

- Project Fact Sheet: https://www.gsa.gov/cdnstatic/Region%207%20BOTA%20External%20Fact%20Sheet%20REV041023.pdf
- Proposed Site Alternatives: https://www.gsa.gov/cdnstatic/Community%20Engagement%20%20Meeting%20Presentation.pdf

If you should have any questions, please do not hesitate to contact:

- Archeology and Historic Preservation Specialist, Victoria Clow: 817.233.9876 or victoria.clow@gsa.gov
- Regional Historic Preservation Officer, Hugo Gardea: 817.978-4229 or hugo.gardea@gsa.gov.

Very Respectfully,

Hugo A. Gardea
Regional Historic Preservation Officer (7PCD)

Attachments

CC: Beth Savage, GSA Federal Preservation Officer
Daniel Partida, GSA Project Manager
Karla Carmichael, GSA NEPA Manager

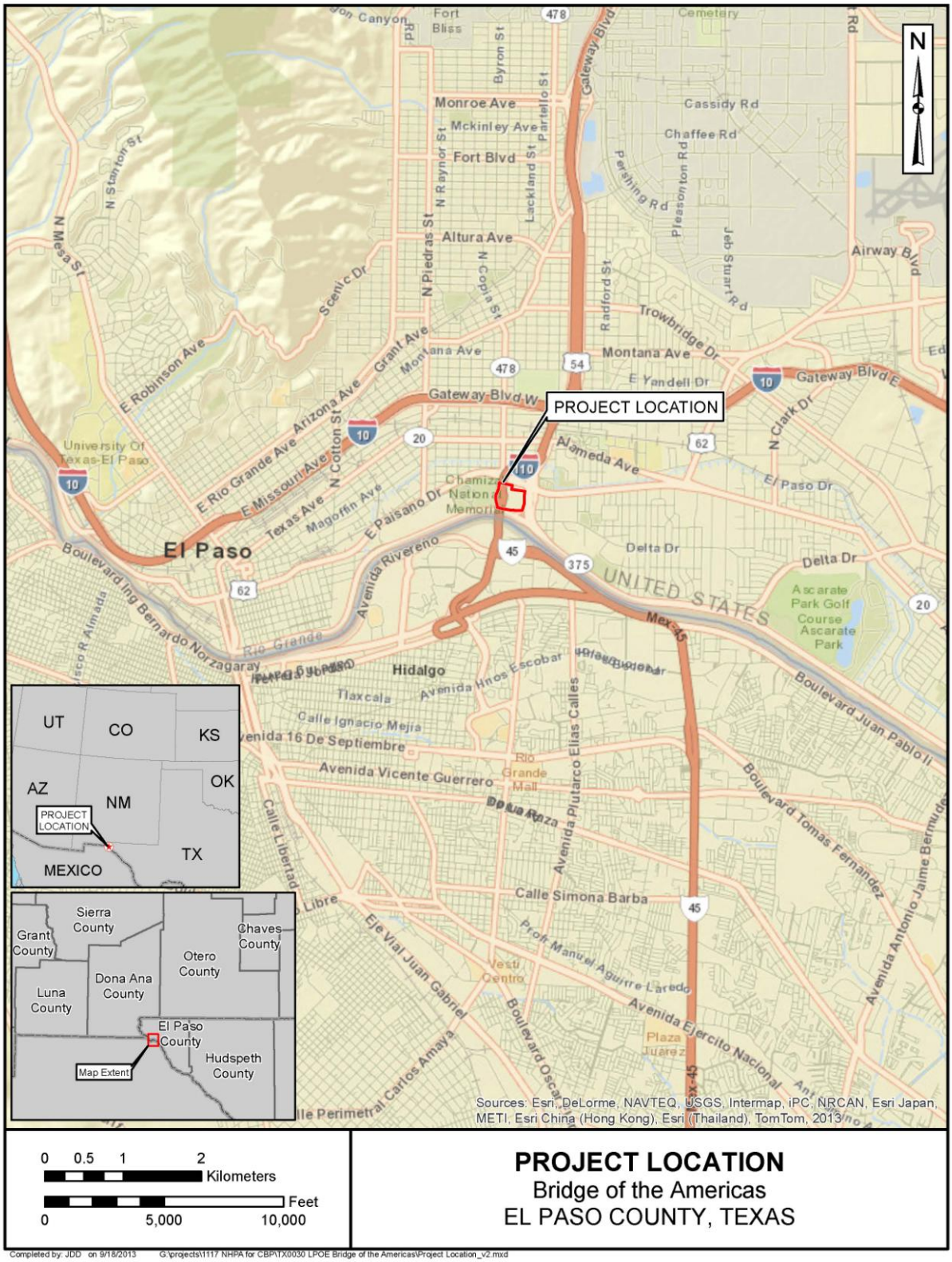
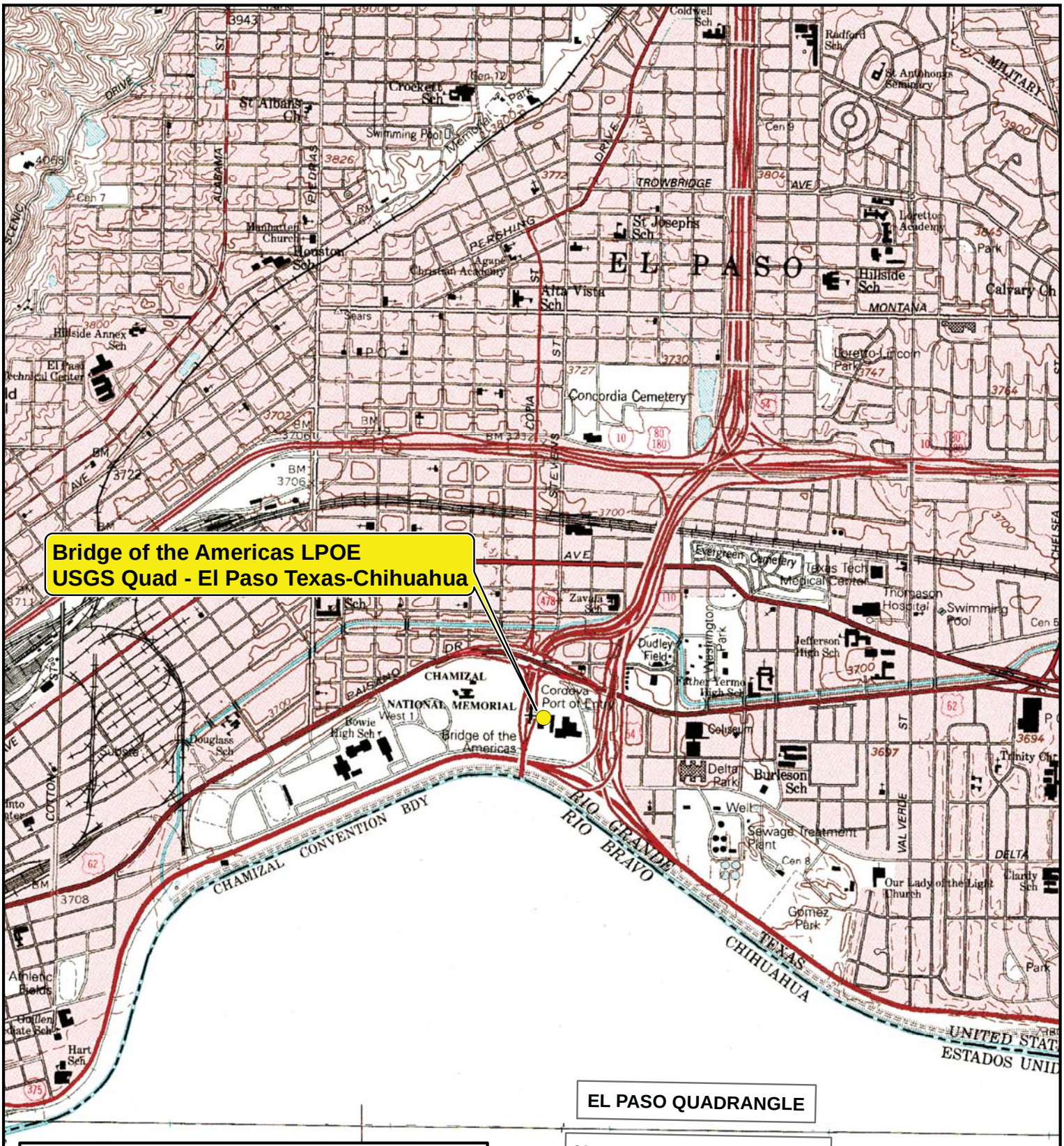


FIGURE 1. BRIDGE OF THE AMERICAS LPOE LOCATION MAP.



USGS 7.5' Topographic Quadrangles for El Paso and Ysleta NW, Texas-Chihuahua (1994)
Datum/Projection: NAD1927 UTM Zone 13N

FIGURE 2. BRIDGE OF THE AMERICAS LPOE LOCATION MAP.

FIGURE 3. BRIDGE OF THE AMERICAS LPOE AERIAL MAP.
The port covers about 28 acres and has fully developed property on three sides with an extensive highway system. The large park property to the left of Highway 110 is the Chamizal National Memorial.

APPENDIX B

Scoping, Public Involvement, and Agency Coordination

APPENDIX B

CBP/USIBWC/GSA MOA

MEMORANDUM OF AGREEMENT
for NATIONAL ENVIRONMENTAL POLICY ACT COMPLIANCE
by and among
the U.S GENERAL SERVICES ADMINISTRATION, and
the
U.S. INTERNATIONAL BOUNDARY AND WATER COMMISSION

This Memorandum of Agreement (MOA) is made and entered into this ___ day of March, 2024, by and among the U.S. International Boundary and Water Commission (IBWC), and the U.S. General Services Administration (GSA) (hereinafter called "the Parties").

I. PURPOSE:

This document formalizes an agreement between the Parties to cooperate in their efforts to comply with the National Environmental Policy Act of 1969, 42 U.S.C. 4321 et seq. (NEPA), as it applies to the proposed modernization of the U.S. Bridge of the Americas Land Port of Entry (BOTA LPOE), located in El Paso, Texas (the "Project"). This MOA formalizes a "cooperating agency" relationship (as that term is defined in 40 CFR 1501.8) with the GSA, as "Lead Agency ", and the IBWC as a "Cooperating Agency", as a means of shared NEPA implementation through joint application of NEPA and its various implementing regulations and procedures.

The Parties are committed to ensuring compliance of the Project with NEPA. Compliance with NEPA will be built into the decision-making process regarding the aspects hereinafter described of the Project to identify ways to mitigate impacts on the environment and the communities affected by the proposed action. The Parties understand the impact that failure to comply with NEPA on a timely and thorough basis may have on the implementation of the Project.

II. AUTHORITIES:

This MOA shall be guided by: the implementing regulations for NEPA issued by the Council on Environmental Quality (CEQ) (40 CFR 1500 et seq.); and, GSA's NEPA implementing procedures found in the Public Building Service [PBS] NEPA Desk Guide, October 1999, 65 Federal Register 69558, November 17, 2000 (PBS NEPA Desk Guide).

III. PROJECT DESCRIPTION & NEPA BACKGROUND

A. On November 6, 2021, Congress passed the Bipartisan Infrastructure Law (BIL), also known as the Infrastructure Investment and Jobs Act (IIJA). On November 15, 2021, the President signed Executive Order (EO) 14052 "Implementation of the Infrastructure Investment and Jobs Act." Finally on December

13, 2021, the President signed EO 14508 "Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government." On February 25, 2022, President Biden and the GSA announced the list of major Land Port of Entry (LPOE) projects funded by the BIL. This included the BOTA LPOE in El Paso, Texas.

B. The purpose of the proposed action is for the GSA to support CBP's mission by bringing the BOTA LPOE operations in line with current CBP land port design standards (i.e. CBP Land Port of Entry Design Standard [CBP 2023]) and operational requirements (i.e., Program of Requirements) while addressing existing deficiencies identified with the ongoing port operations.

C. In 2023, GSA issued a Notice of Intent (NOI) to proceed with the development of an Environmental Impact Statement (EIS) and has initiated on-going scoping with interested parties and the public. GSA is currently in the beginning stages of preparation of the Draft EIS.

D. The Parties have determined that cooperating together towards the timely completion of the EIS (and ultimately the Record of Decision [ROD]) is in the best interest of GSA's compliance with NEPA and the overall implementation of the proposed project.

IV. RESPONSIBILITIES

A. GSA's Responsibilities as Lead Agency. GSA shall act as the Lead Agency for NEPA compliance (i.e., preparation of the EIS and ROD, including signing of the ROD) as defined in the PBS NEPA Desk Guide). As part of this, GSA shall (as deemed necessary and warranted):

1. Share and consult with IBWC regarding project information and data.
2. Invite IBWC to GSA project meetings, public scoping meetings, and stakeholder meetings, as needed.
3. Provide IBWC the opportunity to review and comment on project-related documents.
4. Provide IBWC copies of all project-related documents.

B. Responsibilities of the Cooperating Agencies. IBWC shall act as a Cooperating Agency for NEPA compliance as defined in GSA's NEPA implementation regulations (i.e., PBS NEPA Desk Guide, October 1999). As part of this, IBWC shall (as requested but not limited to):

1. Provide detailed inbound and outbound traffic (pedestrian, privately-owned vehicle [POV], bus, and commercial), noise, air and water quality, environmental, social justice, and other relevant studies data currently in the possession of the respective Cooperating Agency, for all four of the identified Land Ports of Entry (LPOEs) (BOTA, Santa Teresa, Ysleta, and Tornillo LPOE), to include historic, current, and projected levels.
2. Provide any relevant on-going studies, detailed information, meeting minutes, bridge inspection reports, air and water quality studies, cost analysis, and any other applicable information to further GSA's NEPA EIS on the Bridge of the Americas Land Port of Entry ModernizationProject.

3. Attend project meetings, additional public scoping meetings, and other stakeholder meetings as requested by the lead agency.
4. Provide comments on project-related documents within one week or as agreed, in coordination with GSA.
5. Provide GSA a list of Points of Contacts who will participate in the NEPA process.

V. FINANCIAL OBLIGATIONS

Anti-Deficiency Act: This MOA is not a financial or fund obligating document. No appropriated funds are obligated by this MOA and IBWC and GSA agree that no funds will be transferred between them pursuant to this MOA. For all activities undertaken in furtherance of this MOA, and notwithstanding any other provision of this MOA to the contrary, in accordance with 31 U.S.C. § 1341, 41 U.S.C. §§ 6301 and 6303 and other applicable Federal law, nothing in this MOA may be construed or interpreted to obligate IBWC or GSA to any current or future expenditure of funds in advance of, or in excess of, available appropriations. This provision takes absolute precedence over all other provisions of this MOA, notwithstanding any other provision of this MOA to the contrary.

VI. COMMUNICATION

Communication at all levels between the Parties is critical to the success of this effort. The Parties shall strive to provide each other critical information in a timely and seamless manner. Said communications, requests, or notices shall be directed as follows:

GSA:
Project specific information: Daniel.Partida@gsa.gov
Environmental matters: Karla.Carmichael@gsa.gov

IBWC:
Main point of contact: Tamara Cortez; tamara.cortez@ibwc.gov
Secondary point of contact: Dan Sainz; please use both email addresses sainzfd@state.gov and francisco.sainz@ibwc.gov

B. Each party agrees to promptly notify the other Party of any changes to the above referenced contact information.

VII. RIGHT TO TERMINATE

Agreement: Both Parties will have the right, upon 30 calendar days' prior written notice, to terminate this MOA for any reason.

VIII. CONFLICT RESOLUTION

A. The Parties are committed to working cooperatively in ensuring that the NEPA process is conducted in a timely and efficient manner. In accordance with this MOA and a cooperative manner in carrying out

the terms of this MOA, the Parties are establishing a process to be used where issues of significance and substantial disagreement arise between and among the Parties. An issue of significance is intended to refer to disputes, conflicts, or matters which affect GSA's implementation and completion of the NEPA process for the project.

B. In the event of any dispute regarding either Party's obligations under this MOA, the disputing party shall notify the other in writing as to the matter in dispute. The Parties hereto agree to use good faith efforts to meet to discuss and use reasonably good faith efforts to resolve such dispute by agreement. However, as the Lead Agency, GSA reserves the right to make the final decision on any and all disputes or conflicts.

IX. MISCELLANEOUS

A. Counterparts and Signature Page. This MOA may be executed in counterparts with the same force and effect as if GSA and IBWC signed the same physical document.

B. Entire Agreement. This MOA constitutes the entire agreement between GSA and IBWC on the issues set forth herein and supersedes any and all agreements between the parties regarding the issues prior to the Effective Date (defined below) of this MOA. This MOA may be modified or amended only by a writing signed by both parties.

C. Headings. The article and subsection headings of this MOA are for reference and convenience only and do not modify or amend this MOA.

D. Effective Date. This MOA will be effective upon the execution hereof by the later to execute of GSA and IBWC (the "Effective Date") and will terminate upon execution of the ROD or otherwise by mutual agreement.

[Remainder of page intentionally left blank.

Signature page to follow.]

CONCURRENCE AND SIGNATURES:

By signing this document, the Parties agree to all conditions set forth and understand all requirements identified in this MOA.

APPROVED:

U.S. GENERAL SERVICES ADMINISTRATION

By: Giancarlo Brizzi, Regional Commissioner, GSA Public Buildings Service

Date:

U.S. INTERNATIONAL BORDER WATER COMMISSION

By: Jamie J. Edmunds, Chief Administrative Officer

Date: