

RECORD OF DECISION

FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT AND FLOODPLAIN ASSESSMENT AND STATEMENT OF FINDINGS FOR THE EXPANSION AND MODERNIZATION OF THE RAUL HECTOR CASTRO LAND PORT OF ENTRY AND PROPOSED COMMERCIAL LAND PORT OF ENTRY IN DOUGLAS, ARIZONA

ACTION

The U.S. General Services Administration (GSA) has published a Final Supplemental Environmental Impact Statement (SEIS) and Floodplain Assessment and Statement of Findings for the Expansion and Modernization of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) and Proposed Commercial LPOE in Douglas, Arizona. The Final SEIS is a supplement to the *Final Environmental Impact Statement for the Expansion and Modernization of the Raul Hector Castro Land Port of Entry and Proposed Commercial Land Port of Entry in Douglas, Arizona* that GSA completed in April 2024, herein referred to as the 2024 Final Environmental Impact Statement (EIS).

This Record of Decision (ROD) documents the specific components and rationale for GSA's decision. This decision is based on the Final SEIS and Floodplain Assessment and Statement of Findings issued in June 2025; associated technical reports; comments from federal and state agencies, stakeholders, members of the public, tribes, and elected officials; and miscellaneous resources contained in the administrative record. In accordance with the provisions outlined in the Final SEIS, GSA approves the preferred alternative, identified in the Final SEIS as Alternative 1 (Flood Control, Utility Upgrades, and Construction Water Supply), which would involve constructing flood control and utility upgrades at the RHC LPOE and providing adequate construction water for construction of the proposed Commercial LPOE in support of the RHC LPOE Expansion and Modernization Project. Alternative 1 (Flood Control, Utility Upgrades, and Construction Water Supply) has also been identified as the environmentally preferred alternative. The Final SEIS is available on the following website:

- <https://www.gsa.gov/about-us/gsa-regions/region-9-pacific-rim/land-ports-of-entry/raul-hector-castro-land-port-of-entry>.

Comment letters received during the Final SEIS 30-day wait period are provided in Appendix B.

BACKGROUND

GSA signed a Record of Decision (ROD) for the 2024 Final EIS on May 14, 2024. In the ROD for the 2024 Final EIS, GSA selected the preferred alternative, identified as Alternative 2 (Concurrent Construction – Westward Expansion), herein referred to as the 2024 Final EIS preferred alternative, which would involve construction of a new Commercial LPOE and phased expansion and modernization of the existing RHC LPOE at the same time, with expansion primarily to the west of the existing RHC LPOE. GSA approved sub-alternative 2d (combination of adaptive reuse, relocation, and demolition), identified as the preferred alternative for the management of historic structures at the RHC LPOE. As planning for this preferred alternative has continued, GSA has identified demolition of the historic Main Building and Garage as the preferred approach to the historic structures at the RHC LPOE. GSA has continued Section 106 consultation with the Arizona State Historic Preservation Officer (SHPO) and consulting parties to identify, avoid, minimize and mitigate potential adverse effects. The 2024 Final EIS and GSA's signed ROD can be viewed on the GSA project website at:

<https://www.gsa.gov/about-us/gsa-regions/region-9-pacific-rim/land-ports-of-entry/raul-hector-castro-land-port-of-entry/environmental-review>.

During design of the RHC LPOE Expansion and Modernization Project, GSA determined that the existing Rose Avenue channel alignment, which runs through the 2024 Final EIS preferred alternative project area, could result in an increased flood risk to the expanded and modernized RHC LPOE and higher engineering and construction costs. To address these issues, GSA is proposing a project that includes realigning a segment of the Rose Avenue channel (sometimes also referred to as the Rose Avenue Canal or International Canal) and extending and improving the existing concrete box culvert (CBC). GSA also determined that the necessary area to manage stormwater flows from the expanded and modernized LPOE could not be accommodated within the project area originally considered in the 2024 Final EIS, and that additional land area is required for stormwater management. To address this issue, GSA is considering constructing a new stormwater basin to the west of the RHC LPOE. GSA also determined that additional utility lines need to be replaced or installed that were not evaluated in the 2024 Final EIS. To address this issue, GSA is proposing to replace and install various utility lines (i.e., electrical, sanitary sewer, and fiber optic lines) in the vicinity of the RHC LPOE. Lastly, GSA determined that additional construction water was required at the proposed Commercial LPOE, beyond the water that is to be supplied from a temporary groundwater well constructed by the City of Douglas in 2023 near the southeast corner of the proposed Commercial LPOE. To address this issue, GSA is proposing to truck treated wastewater from the City of Douglas Wastewater Treatment Plant (WWTP) to the Commercial LPOE. The project may also include the acquisition of additional land or obtaining appropriate land use agreements, as well as obtaining necessary permissions to implement these changes. As a result of these proposed changes to the 2024 Final EIS preferred alternative, GSA determined that supplemental NEPA analysis was required.

The RHC LPOE is located in Douglas, Arizona, in the southeastern corner of the state, within Cochise County. The existing port is located at the intersection of 1st Street and Pan American Avenue on approximately 6 acres with facilities owned and managed by GSA and operated by the U.S. Department of Homeland Security's Customs and Border Protection (CBP). The RHC LPOE has been operating since 1914, while the construction of the current facility began in the 1930s.

Regional access to the port is by State Route 80 (SR-80) from the west and northeast and U.S. Highway 191 (US-191) from the north. The closest interstate is Interstate 10 (I-10), approximately 63 miles northwest of the City of Douglas. Adjacent land within the 2024 Final EIS preferred alternative project area includes a small city park, a cluster of small shops, and undeveloped land. Commercial and industrial warehouses exist along the eastern perimeter of the RHC LPOE, along Customs Avenue and 1st Street. The project area is located west of the existing RHC LPOE and Pan American Avenue, south of East 3rd Street, north of Border Road and the U.S. – Mexico border, and both east and west of Chino Road.

PURPOSE AND NEED FOR THE PROJECT

As described in Section 1.2 of the 2024 Final EIS, the purpose of the RHC LPOE Expansion and Modernization Project is for GSA to support CBP's mission by bringing the RHC LPOE operations in line with current land port design standards and operational requirements of CBP while addressing existing deficiencies identified with the ongoing port operations. The need for the RHC LPOE Expansion and Modernization Project is to bring the RHC LPOE operations in line with CBP's design standards and operational requirements; improve the capacity and functionality of the LPOE to meet future demand, while maintaining the capability to meet border security initiatives; ensure the safety and security for the employees and users of the RHC LPOE; and improve traffic congestion and safety for the City of Douglas.

The purpose of this project is to address overall flood control and utility requirements (i.e., stormwater, electrical, sanitary sewer, and fiber optic), as well as improve port operational efficiency for the RHC

LPOE Expansion and Modernization Project. The project is needed to avoid engineering conflicts between the current alignment of the Rose Avenue channel with the current proposed layout for the expanded and modernized RHC LPOE; to divert stormwater away from and reduce flooding risks at the RHC LPOE; to provide sufficient stormwater capacity for the expanded and modernized RHC LPOE; and to enhance overall functionality and safety. In addition, the project is needed to meet proposed utility requirements of the expanded and modernized RHC LPOE and bring it in line with current land port design standards and operational requirements. Existing electrical lines are also located within the area proposed for realignment of a segment of the Rose Avenue channel and power the city's WWTP, located west of the existing RHC LPOE. These lines need to be relocated to maintain electrical service to the WWTP as well as to satisfy CBP design requirements, which prohibit overhead lines within LPOE boundaries. Finally, this project is needed to consider construction water demand and supply at the proposed Commercial LPOE.

PROJECT ALTERNATIVES EVALUATED IN THE FINAL SEIS

The Proposed Action is defined as constructing flood control and utility upgrades at the RHC LPOE and addressing adequate construction water supply for the proposed Commercial LPOE in support of the RHC LPOE Expansion and Modernization Project. The Proposed Action would include the realignment of a segment of the Rose Avenue channel, construction of a new stormwater basin west of the 2024 Final EIS preferred alternative project area, and replacing and installing various utility lines in the vicinity of the RHC LPOE. The Proposed Action would support and interconnect with design elements from the 2024 Final EIS preferred alternative as described above. The Proposed Action would include site preparation, including demolition of the existing stormwater channel segment (west of the existing site) and a portion of CBC within the 2024 Final EIS preferred alternative project area; potential land acquisition or establishment of applicable land use agreements in the vicinity of the Proposed Action; realignment of a segment of the Rose Avenue channel and associated stormwater channel system components; repair of CBC and road systems impacted by the Proposed Action; and other various utility or ancillary facilities constructed in support of the RHC LPOE Expansion and Modernization Project. The Proposed Action also includes hauling of treated wastewater from the City of Douglas wastewater treatment plant (WWTP) to the proposed Commercial LPOE site for use in dust suppression and soil compaction.

As part of the decision-making process, GSA carried forward one action alternative (Alternative 1 – Flood Control, Utility Upgrades, and Construction Water Supply) and the No Action Alternative for analysis in the Draft and Final SEIS.

Alternative 1 – Flood Control, Utility Upgrades, and Construction Water Supply

Under Alternative 1, GSA proposes to construct flood control and utility upgrades in the vicinity of the RHC LPOE that were not included in the 2024 Final EIS. In addition, Alternative 1 includes consideration of adequate provisions for construction water at the proposed Commercial LPOE site. The proposed layout shown in the Final SEIS represents a preliminary concept site plan for development and is used as a basis for discussion and environmental analysis.

Alternative 1 would consist of the following:

Construct an approximately 2,750-foot-long stormwater channel that is anticipated to be primarily a riprap-lined open channel along the entire route. A small, approximately 50-foot segment of the stormwater channel where it meets Border Road would be concrete-lined to facilitate vehicle access. GSA is also considering construction of the entire proposed channel segment as an open, concrete-lined channel, although the riprap-lined open channel design is the current preference. The proposed stormwater channel would originate at an extended CBC located beneath the existing POV lanes south of the RHC LPOE inspection area and generally travel west, north of Border Road, and terminate at the unnamed wash west of Chino Road at the U.S – Mexico border. Water flowing out of this proposed

channel would proceed south along the unnamed wash across the U.S. – Mexico border as it does under existing conditions. The proposed alignment of the channel segment would avoid, as much as possible, existing utility components such as utility poles, sewer manholes, utility vault, the Border Road and sewer mains.

Evaluate and improve the existing CBC beneath the LPOE. A portion of the existing CBC may be maintained in place.

Extend the existing CBC to the west and terminate it immediately west of the planned repatriation drop off location at the southern end of the expanded and modernized LPOE. Demolition of existing structures would be limited to only a portion of the existing CBC that needs to be removed.

Demolish the existing stormwater channel segment that parallels the western side of Pan American Avenue between East 3rd Street and the southern end of the existing RHC LPOE. The upstream end of the existing channel would then be transitioned to the surrounding adjacent grade and rock riprap would be placed on the exposed surface. Alternatively, the existing stormwater channel segment may be reused as conduit or other purposes during the expansion and modernization of the RHC LPOE.

Install a new CBC where the proposed stormwater channel crosses Chino Road. This would also include repairing the portions of Chino Road that are impacted by improving the CBC in that area, and may require lowering a segment of an existing 8-inch water line that is located in close proximity to this CBC. A portion of Chino Road south of East 3rd Street may have to be partially or completely closed during construction of the CBC.

As necessary, construct a maintenance road on either the north or south side of the proposed stormwater channel for maintenance access. This could also include a crossing or bridge over the proposed stormwater channel, as well as installation of guard rails as needed.

Potentially construct security fencing on the north side of the proposed stormwater channel.

Construct a new approximately 6.2-acre stormwater basin between the RHC LPOE and Chino Road and north of the proposed stormwater channel. The stormwater basin would be designed for temporary water storage with a 36-hour drain time, in compliance with City regulations, rather than a retention basin for permanent water storage.

Obtain all necessary land and right-of-way permissions as applicable for the realigned stormwater channel segment and new stormwater basin. This could include acquiring, obtaining easements, or obtaining similar land use agreements on portions of land within a proposed additional expansion area totaling approximately 24 acres currently owned by the City of Douglas and a private landowner. This may also include a new right-of-way grant from the Bureau of Land Management (BLM) if any portions of BLM land are required for construction.

Replace or install approximately 6,500 feet of electrical lines, 4,700 feet of sanitary sewer line, and 1,400 feet of fiber optic lines in the vicinity of the RHC LPOE:

- West of Pan American Avenue, existing aboveground electrical lines would be removed and re-routed to tie into existing service lines. The exact route of the electrical line west of Pan American Avenue is not known at this time and would be determined during design; however, the alignment would occur within some section of the potential disturbance area for electrical utilities. Newly installed electrical lines may consist of either aboveground pole-mounted lines, buried lines, or a combination of both. Burial of lines would require trenching. GSA has estimated that less than one acre of land would be disturbed during installation of this segment.

West of Pan American Avenue an existing sanitary sewer line would need to be temporarily extended and realigned to Chino Road, south of East 3rd Street so as to maintain service

during construction and temporarily avoid conflicts with the realigned Rose Avenue channel segment construction footprint. This would include construction of a new manhole and establishing a new connection to an existing manhole at a sanitary sewer line east of Chino Road. Permanent sanitary sewer service for the expanded and modernized RHC LPOE is expected to tie into the existing alignment along East 3rd Street near the intersection with Pan American Avenue. At the western terminus of East 3rd Street with the intersection of Chino Road, the sanitary sewer line would need to be extended west towards the WWTP, due to engineering conflicts between the proposed stormwater channel and existing sanitary sewer line along the Chino Road alignment south of East 3rd Street. The exact alignment of the new sanitary sewer connection west of Chino Road is unknown but would occur somewhere within the potential disturbance area for wet utilities, and is expected to temporarily disturb no more than 4.4 acres. In the long term, it is expected that the existing sanitary sewer lateral within the Chino Road alignment south of East 3rd Street, as well as portions of the existing sanitary sewer lines within the project area west of the expanded and modernized RHC LPOE, would be abandoned or removed.

- East of Pan American Avenue, electrical, sanitary sewer, and fiber optic lines would be installed around the 2024 Final EIS preferred alternative project area. Similar to utility work occurring west of Pan American Avenue, newly installed electrical lines may consist of either aboveground pole-mounted lines, buried lines, or a combination of both. Burial of lines would require trenching. Sanitary sewer and fiber optic lines are anticipated to require trenching. Sanitary sewer line work may be conducted in conjunction with abandonment of the existing line west of Pan American Avenue.
- All construction work for these proposed utility lines would be conducted within existing or newly established rights-of-way (estimated at approximately 25 feet wide for electrical and sanitary sewer and approximately 15 feet wide for fiber optics) and would connect to utility lines owned and operated by the City of Douglas or local utility providers. No additional land acquisition would be required for the replacement and installation of these utility lines beyond what is already being considered for the realigned stormwater channel segment and new stormwater basin. GSA would obtain all necessary land use and right-of-way permissions, as required. Electrical work may ultimately be conducted by the local utility provider rather than GSA.

Supply construction water to the proposed Commercial LPOE site through trucking treated wastewater from the City of Douglas WWTP over a period of up to 9 months. Water would be utilized for dust suppression and soil compaction. Treated wastewater would meet the requirements of Class B reclaimed water as demonstrated by ongoing WWTP monitoring, which as per the Arizona Administrative Code, Title 18, Chapter 11, Article 3 - Table A allows for the use of reclaimed water for dust control and soil compaction. Peak water demand of up to 250,000 gallons per day (gpd) would be required for approximately up to 4.5 months; the remaining 4.5 months would require less water. This would be the equivalent of up to approximately 63 additional trucks per day during peak periods assuming a truck capacity of 4,000 gallons. Trucks would travel between the City of Douglas WWTP and the proposed Commercial LPOE site via International Avenue. As necessary, water would be utilized for dust suppression along International Avenue during truck transit. Use of treated wastewater would require appropriate coordination with the City of Douglas and Mexico relative to existing agreements for wastewater transfer, as well as coordination with U.S. Border Patrol regarding the use of International Avenue. In addition, GSA would satisfy a portion of construction water needs from a temporary well previously constructed by the City of Douglas, as discussed in the 2024 Final EIS.

Stormwater would still flow through the segment of the unnamed wash from the existing discharge point and proposed new discharge point of the Rose Avenue channel from properties located to the north, northeast, and east; however, the amount of stormwater flowing through the wash in this segment would

be reduced due to flow being diverted from the realigned Rose Avenue channel. GSA is in the process of conducting hydrology studies to investigate overall changes in flow through the existing and proposed stormwater channels as well as into the unnamed wash.

The timeframe for agency coordination and construction is tentative and is subject to change. However, design and agency coordination for Alternative 1 is anticipated to take approximately one year to complete, and construction activities at the RHC LPOE are anticipated to take approximately 6 months in total to complete. Construction of the utility upgrades (i.e., stormwater, electrical, sanitary sewer, and fiber optic) is expected to occur during the construction of the RHC LPOE Expansion and Modernization Project as considered in the 2024 Final EIS. Construction of the realigned Rose Avenue channel segment is expected to occur prior to construction of the RHC LPOE Expansion and Modernization Project as considered in the 2024 Final EIS. During construction of the realigned Rose Avenue channel segment, it is estimated there could be approximately 20 worker vehicles, 20 delivery vehicles for construction supplies, and 10 haul trucks per day to the project area for deliveries and waste removal near the RHC LPOE. The number of workers and vehicle trips for construction of utility upgrades would be consistent with levels evaluated in the 2024 Final EIS for the RHC LPOE. All construction and demolition waste would be disposed of and recycled at authorized facilities. Hauling of construction water between the City of Douglas WWTP and the proposed Commercial LPOE site would be required for a period of up to 9 months and would result in an additional 63 truck trips along International Avenue beyond the levels analyzed in the 2024 Final EIS for the Commercial LPOE (i.e., up to 150 trucks/day during peak construction). GSA would implement appropriate traffic control measures and install signage on local roadways during construction to manage construction vehicle traffic.

During operations, maintenance procedures would be put in place in accordance with industry standard protocol to ensure the proper functioning of the realigned Rose Avenue channel, new stormwater basin, and other utility upgrades.

No Action Alternative

The No Action Alternative assumes that GSA would not demolish portions of the existing stormwater channel; would not realign a segment of the Rose Avenue channel; would not construct a new stormwater basin; would not replace or install electrical, sanitary sewer, fiber optic utilities, or any other associated supporting facilities; and would not provide sufficient water needed for construction of the Commercial LPOE. In addition, no acquisition or establishment of land use agreements would occur on parcels of land proposed for the project.

In general, this alternative would not meet the purpose and need for the Proposed Action. Under the No Action Alternative, the RHC LPOE Expansion and Modernization Project would be constructed as described in the 2024 Final EIS. The overall stormwater management and flood control needs for the expanded and modernized RHC LPOE would not be addressed; stormwater flow would not be diverted; electrical, sanitary sewer, and fiber optic requirements would not be met; and engineering conflicts between the current alignment of the Rose Avenue channel and the RHC LPOE Expansion and Modernization Project layout would remain. As a result, the No Action Alternative would increase flood potential at the expanded and modernized RHC LPOE and surrounding area, increasing risks that the RHC LPOE could be partially shutdown or impacted during a storm event, impeding the LPOE's functionality, and jeopardizing the security and safety at the RHC LPOE. In addition, the utility requirements for the expanded and modernized RHC LPOE would not be met, lessening the port's operational efficiency and its ability to support the CBP mission. Further, water requirements for construction of the proposed Commercial LPOE would not be fully met, resulting in increased fugitive dust generation during construction.

ENVIRONMENTAL CONSEQUENCES

Resource Analysis and Overall Impact Finding

Resources analyzed in the SEIS included cultural resources; air quality; land use; geology and soils; water resources; biological resources; infrastructure and utilities; socioeconomics; and human health and safety.

Based on the analysis presented in the Final SEIS, impacts to all resource areas would be less-than-significant (i.e., negligible, minor, or moderate) adverse or beneficial. Impact reduction measures would mitigate potential adverse effects and are identified below under *Avoidance, Minimization and Mitigation Measures*. Beneficial impacts could occur to the following resource areas: land use, geology and soils, water resources; infrastructure and utilities; and human health and safety.

Cultural Resources and Section 106 Compliance

Past consultation efforts under Section 106 of the National Historic Preservation Act (NHPA) conducted as part of the 2024 Final EIS are summarized in Section 3.2.2.2 of that EIS as well as in the May 2024 ROD. To date, SHPO has concurred with GSA's determinations for eligibility for historic resources within the 2024 Final EIS preferred alternative project area. Specifically, SHPO concurred with GSA's determination that the Pan American and Customs Avenues Public Park Bathroom Building, the Cattle Operation Building, and the isolated archaeological finds identified during the cultural resource surveys are ineligible for inclusion in the National Register of Historic Places. GSA has committed to implementing an archaeological monitoring plan in consultation with SHPO and federally recognized Indian tribes. If unanticipated discoveries are encountered during ground-disturbing activities, such as excavating and grading, all earth-moving activity within and around the immediate discovery area would be avoided until a qualified archaeologist can assess the nature and significance of the find. GSA is continuing consultation with the SHPO and consulting parties under Section 106 of the NHPA. GSA notified SHPO and consulting parties of the expanded APE on November 8, 2024, and held a consulting parties meeting at RHC LPOE on November 15, 2024, that identified demolition of the historic Main Building and Garage as the preferred approach to the historic structures at the RHC LPOE. SHPO concurred with the expanded APE on December 6, 2024. GSA provided additional updates on the expanded APE on January 7, 2025, pertaining to the realigned Rose Avenue channel segment and stormwater basin. On June 23, 2025, GSA submitted its formal adverse effect on historic properties determination, provided an update to the SHPO and consulting parties, and requested the next consultation meeting be scheduled to continue negotiating mitigation stipulations to be included in a Memorandum of Agreement. GSA continues to explore all alternatives that avoid, minimize and mitigate potential effects to historic properties through the Section 106 process. Implementation of the project cannot occur until all regulatory processes are complete, including the Section 106 process.

Tribal Consultation

GSA sought tribal input to help inform the analysis of the project. GSA previously solicited tribal input as part of the RHC LPOE Expansion and Modernization Project as described in Section 1.3.5 of the 2024 Final EIS. Federally recognized tribes were sent letters of notification of intent to prepare a SEIS on October 11, 2024, providing them with project updates. One response was received from the White Mountain Apache Tribe Historic Preservation Office on October 17, 2024, which stated that the proposed project would have no adverse effect to the tribe's cultural heritage resources, and further consultation for the proposed project is not necessary. Tribes were sent an additional letter on April 4, 2025, providing notification that the Draft SEIS was available for public review. The White Mountain Apache Tribe Historic Preservation Office responded on April 4, 2025, stating again that the proposed project would have no adverse effect to the tribe's cultural heritage resources and/or traditional cultural properties.

Endangered Species Act (ESA) Consultation

GSA previously conducted informal consultation with the U.S. Fish and Wildlife Service (USFWS) Arizona Ecological Services Field Office as part of the RHC LPOE Expansion and Modernization Project as described in Section 1.3.4 of the 2024 Final EIS. GSA submitted an updated informal consultation letter for the Proposed Action to the USFWS on January 8, 2025, regarding the effects determination to federally protected species under Section 7 of the Endangered Species Act (ESA). The USFWS responded to GSA's informal consultation letter on February 3, 2025, requesting additional information. GSA provided additional information to USFWS in a teleconference on May 1, 2025. The USFWS responded on May 28, 2025, concurring with GSA's determination that the Proposed Action may affect but would not adversely affect the jaguar, ocelot, and yellow-billed cuckoo. GSA would implement the USFWS' Conservation Measures listed in the May 28 concurrence letter as part of project implementation. USFWS also transmitted an amended concurrence letter to their February 28, 2024 concurrence letter for the 2024 Final EIS.

Floodplain Management

The project area contains approximately 0.75 acre within the 1-percent-annual-chance floodplain and 2.96 acres within the 0.2-percent-annual-chance floodplain associated with the existing stormwater channel segment (i.e., the regulatory floodway) and segments of the proposed utility upgrades. In accordance with Executive Order 11988 (*Floodplain Management*) and GSA's *Floodplain Management Desk Guide*, GSA prepared a Floodplain Assessment and Statement of Findings addressing potential impacts on floodplains, which provides a Finding of No Practicable Alternative for construction within floodplains. Based on this assessment the realignment of the Rose Avenue channel segment is not anticipated to affect the floodplain's capacity to store water or result in the potential to further expand the floodplain or increase the spread or intensity of a flood event. In addition, it is anticipated that the Proposed Action would not result in significant adverse impacts from the removal of existing Special Hazard Flood Areas that correspond with the regulatory floodway, or from any potential establishment of new Special Hazard Flood Areas. The floodplain assessment was provided for public review as part of the Draft and Final SEIS.

For further details on the environmental consequences for each alternative, this ROD incorporates, by reference, Table 2-1 and Chapter 3 in the Final SEIS.

AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES

The avoidance, minimization, and mitigation measures identified in the 2024 Final EIS would be implemented as well as the following avoidance, minimization, and mitigation measures identified in the Final SEIS during the phase in which the associated impact would occur.

Cultural Resources (Section 3.2.2.5 in the Final SEIS)

To reduce the risk of damage to known and unknown archeological sites from ground disturbing activities, GSA will develop an archeological monitoring plan in Section 106 consultation with SHPO, Advisory Council on Historic Preservation (ACHP), federally recognized Indian tribes, and other consulting parties.

GSA's planning with respect to compliance with historic preservation requirements is being handled through the Section 106 process under the NHPA. Appropriate measures will be identified through this process to avoid, minimize, or mitigate adverse effects on historic properties as necessary. Approval of this ROD adopts any forthcoming mitigation measures that may result from the Section 106 process. Final implementation of the Project cannot occur until all regulatory processes are complete, including the Section 106 process.

Air Quality (Section 3.3.2.4 in the Final SEIS)

Air quality impact reduction measures for the 2024 Final EIS preferred alternative were adopted in the May 2024 ROD and are incorporated herein by reference as they will also apply to the Proposed Action. In addition, GSA will take the following additional steps to minimize emissions from the Proposed Action:

- Use cement blended with the maximum feasible amount of fly ash or other materials that reduce emissions from cement production.
- Recycle construction debris to the maximum extent feasible.
- Consider using locally sourced materials to reduce transportation emissions.
- Use water hauled along International Avenue between the City of Douglas WWTP and the proposed Commercial LPOE for dust suppression at the Commercial LPOE construction site and along haul routes, as necessary.

Land Use (Section 3.4.2.4 in the Final SEIS)

Although local governments cannot regulate or permit activities of the federal government on federally owned land, GSA will consider local zoning laws for construction and operation of the proposed realigned Rose Avenue channel segment and new stormwater basin and all design requirements of state and local governments to the extent practicable. To ensure minimal conflicts with land use, GSA will continue coordination efforts during the design process with city and county governments, Arizona Department of Transportation, utility providers, and other stakeholders, as applicable and necessary.

Geology and Soils (Section 3.5.2.4 in the Final SEIS)

Measures to reduce construction impacts on geology and soil-related concerns such as soil erosion, loss, and stability will be addressed in project design plans and through erosion and sediment controls as well as site stabilization controls per the Arizona Stormwater CGP requirements. GSA will ensure adequate construction water is available at the Commercial LPOE to reduce wind and erosion related soil loss from the 2024 Final EIS preferred alternative. Refer to Water Resources (below) for a discussion of measures that will limit impacts from soil loss as a result of erosion during construction and operations.

Water Resources (Section 3.6.2.4 in the Final SEIS)

Water resources impact reduction measures for the 2024 Final EIS preferred alternative were adopted in the May 2024 ROD and are incorporated herein by reference as they will also apply to this Proposed Action. In addition, GSA will consider incorporating bioswales or permeable pavements in the project design where applicable to enhance stormwater management capabilities.

Biological Resources (Section 3.7.2.4 in the Final SEIS)

Biological resources impact reduction measures for the 2024 Final EIS preferred alternative were adopted in the May 2024 ROD and are incorporated herein by reference as they will also apply to this Proposed Action. This includes adopting BMPs to clean equipment and reduce the potential for introduction or spread of invasive species.

In addition, GSA will implement the following measures:

- An occupancy survey will be conducted to determine if any western burrowing owls are present within the project area in accordance with the *Burrowing Owl Project Clearance Guidance for Landowners*. The survey will be conducted by a surveyor who is certified by the Arizona Game and Fish Department (AZGFD) or has similar training and qualifications. If an active burrowing owl burrow is detected, GSA will contact AZGFD and USFWS for further direction.
- To the extent practicable, vegetation clearing or trimming will be avoided in the project area during the migratory bird nesting season (generally between January and June). If clearing or

trimming is required during the nesting season, surveys will be conducted by a qualified biologist to determine if any nesting birds occur in the project area prior to removal or trimming of vegetation. If nesting birds are present, removal or trimming of the vegetation will be delayed until after nesting season, or GSA will coordinate with the USFWS for additional technical assistance in complying with the Migratory Bird Treaty Act.

- To the extent practicable, the amount of time any open trench or large hole is left open will be minimized. When trenches or large holes cannot be backfilled immediately, escape ramps (e.g., short lateral trenches or wooden planks sloping to the surface) will be installed in each hole and at least every 295 feet (90 meters) in a trench. Slopes will be less than 45 degrees and trenches and holes that have been left open will be inspected to remove any wildlife prior to backfilling.
- Pre-construction presence/absence surveys for any bald or golden eagles will be completed to determine if there is a need to remove potentially suitable habitat within the project area. Surveys will be conducted pursuant to local USFWS field office requirements. The need for any restrictions around tree clearing, if any, will be determined in coordination with applicable federal resource agencies pending survey results. If the project is determined to have potential to disturb or kill bald or golden eagles, GSA will obtain a permit under the Bald and Golden Eagle Protection Act.
- Use drought-resistant native vegetation for landscaping around the new stormwater basin.
- Employ invasive vegetation monitoring and treatment post construction in alignment with the Arizona Department of Agriculture and Arizona Native Plant Society recommendations.
- Adequate construction water will be used during construction of the Commercial LPOE to reduce concerns related to fugitive dust emissions.

Infrastructure and Utilities (Section 3.8.2.4 in the Final SEIS)

Impacts on infrastructure and utilities from the Proposed Action will be reduced through the following:

Prioritizing native plant species when introducing new vegetation. For the Proposed Action, this could include using native, drought-resistant vegetation around the new stormwater basin to reduce maintenance needs and enhance water conservation.

To avoid or limit the potential for utility service interruptions, existing utility maps will be reviewed, and utility companies will be contacted in advance of construction to identify any locations where utility lines could be affected.

Implement a maintenance plan that includes regular inspections and cleaning of the stormwater management facilities to ensure its continued effectiveness.

Human Health and Safety (Section 3.9.2.4 in the Final SEIS)

Human health and safety impact reduction measures for the 2024 Final EIS preferred alternative were adopted in the May 2024 ROD and are incorporated herein by reference as they will also apply to this Proposed Action.

GSA will take the following additional steps to reduce impacts from construction and operation of the Proposed Action:

Safety measures will be implemented around the stormwater basin, such as proper signage, safety barriers, and gradual slopes to minimize drowning risks. Fencing on the north side of the proposed stormwater channel may be considered pending final design.

Regular inspections and maintenance of the stormwater management facilities will be conducted to ensure its continued safe operation and structural integrity.

During removal and replacement of electrical lines, appropriate safety protocols, including de-energizing lines as applicable, ensuring proper grounding, and using protective barriers, will be implemented to prevent electrical hazards.

Trenching safety measures such as shoring, trench boxes, and worker safety training will be implemented as applicable to minimize risks associated with excavation and confined space entry.

As necessary, the need for further due diligence will be considered within potential disturbance area for utilities prior to construction. This could include ground penetrating radar within the potential disturbance area for wet utilities west of Chino Road prior to construction to investigate for the presence of subsurface objects associated with the former Phelps Dodge Smelter Site.

Construction workers, including utility providers, working in any potential disturbance areas for utilities will wear appropriate personal protective equipment during construction as necessary to avoid impacts from potentially contaminated soils, and will characterize any soils that are to be disposed of offsite to determine appropriate management and disposal requirements in accordance with federal, state, and local regulations.

Mitigation Monitoring and Enforcement Program

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

DECISION

As Acting Regional Commissioner of GSA Region 9, Public Buildings Service, it is my decision to approve the Preferred Alternative, Alternative 1 (Flood Control, Utility Upgrades, and Construction Water Supply).

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

Alternative 1 (Flood Control, Utility Upgrades, and Construction Water Supply) is identified as the environmentally preferable alternative, as it best promotes NEPA's national environmental policy by minimizing environmental harm and protecting resources. This alternative provides significant benefits over the existing conditions (No Action), such as optimizing land use for flood control and utilities, improving local waterway hydrology through stormwater diversion, enhancing overall stormwater management to reduce flooding and erosion, and ensuring a sufficient construction water supply for dust and soil control at the Commercial LPOE.

RATIONALE FOR IMPLEMENTING THE PREFERRED ALTERNATIVE

The following economic, technical, and GSA mission considerations were weighed in reaching my decision to approve the preferred alternative, Alternative 1 (Flood Control, Utility Upgrades, and Construction Water Supply) as described in the Final SEIS, due to the fact that it will best support CBP's mission by bringing the RHC LPOE operations in line with CBP's land port design standards and operational requirements, while addressing existing deficiencies identified with the proposed expanded and modernized RHC LPOE. These issues include the following:

Engineering conflicts between the current alignment of the Rose Avenue channel with the current proposed layout;

Level of potential flood risks to facilities and infrastructure;

Insufficient stormwater capacity;

Lack of utility requirements to meet demands;

And insufficient availability of construction water to adequately provide for dust suppression and soil compaction during construction of the proposed Commercial LPOE.

My decision to approve the preferred alternative is based on a balancing of likely adverse impacts to the City of Douglas, Cochise County, and surrounding residents as considered in the Final SEIS with the need to improve the operational efficiency, effectiveness, security, and safety for the CBP staff and cross-border travelers at the RHC LPOE. This decision likewise takes into account resource concerns, mission and program of the federal inspection services and public interests as analyzed in the Final SEIS. I reached this decision after careful consideration of the environmental analysis of the effects of the action alternative and the no action alternative, in concert with the needs of the federal government and with the input from the City of Douglas and other public stakeholders.

The following GSA mission considerations were weighed in reaching my decision:

- Providing the federal inspection facilities with a safe, secure, and more efficient workplace;
Providing the taxpayer with a cost-effective government facility, inclusive of construction costs.

Record of Decision Approval:

Signature:  _____
F860F6E57D8A4F4...
Amanda Sweeney
Acting Regional Commissioner
Pacific Rim Region
Public Buildings Service
General Services Administration

7/21/2025

Date

APPENDIX A. COMMENT LETTERS RECEIVED ON FINAL SEIS

ID 1: U.S. Environmental Protection Agency, Region 9



REGION 9

SAN FRANCISCO, CA 94105

July 9, 2025

Osmahn A. Kadri
US General Services Administration
Public Buildings Service
Portfolio Management Division 9P2PTC
450 Golden Gate Avenue, 3rd Floor East
San Francisco, California 94102

Subject: Comment for the Supplemental Final Environmental Impact Statement for the Raul Hector Castro Land Port of Entry, Cochise County, Arizona (CEQ#20250084)

Dear Mr. Kadri:

The U.S. Environmental Protection Agency has reviewed the General Services Administration's Notice of Intent to prepare the above-referenced document pursuant to the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. The CAA Section 309 role is unique to EPA. It requires EPA to review and comment on the environmental impact on any proposed federal action subject to NEPA's environmental impact statement requirements and to make its comments public.

EPA 309 Review Summary

EPA did not identify significant concerns to be addressed in the Supplemental Draft EIS, and we note our comment has been included in Appendix E comments and responses to the Supplemental Final EIS. The lead agency signed the Record of Decision for the Final Environmental Impact Statement for the Raul Hector Castro Land Port of Entry expansion and modernization project on May 6th, 2024. The General Services Administration prepared this Supplemental Environmental Impact Statement to address and improve overall stormwater management and flood control needs for the project, specifically related to the modernization of the existing Land Port of Entry. The Build Alternative will include acquiring land and right-of-way permissions for a stormwater channel of 2,500 feet of length between the Land Port and a desert wash west of Chino Road, and a 5-acre retention pond between the Land Port and Chino Road, north of the new channel.

We appreciate the opportunity to review this Supplemental Final EIS. If you have any questions, please contact me at (415) 972-3659 or the lead reviewer, Zac Appleton, at (415) 972-3321 or appleton.zac@epa.gov.

Sincerely,

FRANCISCO DONEZ

Francisco Dóñez
Manager
Environmental Review Section 2

Digitally signed by FRANCISCO
DONEZ
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amanda.sweeney@gsa.gov

Acting Regional Commissioner

US General Services Administration

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Russell Larson

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