

**Draft**  
**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**

**September 2023**



Prepared for:  
GSA Region 9

Prepared by:  
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## COVER SHEET

**Responsible Agency:** U.S. General Services Administration

**Title:** Environmental Impact Statement for the Expansion and Modernization of the Raul Hector Castro Land Port of Entry and Proposed Commercial Land Port of Entry, Douglas, Arizona

The United States (U.S.) General Services Administration (GSA) proposes to expand and modernize the existing Raul Hector Castro (RHC) Land Port of Entry (LPOE), including construction of a new Commercial LPOE approximately 5 miles west of the existing RHC LPOE to address various operational, capacity, and safety issues associated with the existing LPOE. The RHC LPOE is located at the U.S.-Mexico border in Douglas, Arizona, located in the southeastern corner of the state and across from Agua Prieta, Sonora in Mexico.

GSA has prepared this revised Draft Environmental Impact Statement (EIS), which examines the purpose of and need for this project; alternatives considered; the existing environment that could be affected; the potential impacts resulting from each of the alternatives; and proposed best management practices and/or mitigation measures. This revised Draft EIS considers three action alternatives: 1) Alternative 1 (Sequential Construction) would involve construction of a new Commercial LPOE first, followed by a phased expansion and modernization of the existing RHC LPOE after the Commercial LPOE is operational; 2) Alternative 2 (Concurrent Construction – Westward Expansion) would involve construction of the 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; and 3) Alternative 3 (Concurrent Construction – Eastward Expansion), which would involve construction of the new Commercial LPOE and phased expansion and modernization of the existing RHC LPOE at the same time, with expansion primarily to the east of the existing RHC LPOE. Alternative 3 was identified through internal scoping following issuance of the original Draft EIS in January 2023.

Due to the change in the analysis, GSA is re-issuing this revised Draft EIS to solicit comments from interested persons and stakeholders during a 45-day comment period. Previously, GSA collected comments from interested persons and stakeholders during a 45-day comment period beginning on January 27, 2023. Comments received during this comment period have been addressed in this revised Draft EIS.

The public was notified of the public hearing for the revised Draft EIS through publication of a Notice of Availability in the *Federal Register*, as well as multiple other channels of communication, including newspaper ads, letters to interested parties, and social media posts. Comments received during the 45-day comment period will be considered in preparation of the Final EIS and will be made part of the Administrative Record.

Comments on this Draft EIS may be emailed to [Osmahn.Kadri@gsa.gov](mailto:Osmahn.Kadri@gsa.gov) or sent to:

Potomac-Hudson Engineering, Inc.  
Attention: RHC LPOE Draft EIS  
77 Upper Rock Circle, Suite 302  
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For individuals with sensory disabilities, this document can be made available in alternate formats. To obtain a copy in an alternate format, receive special assistance to attend and participate in the revised Draft EIS public meeting, or for further information concerning this revised Draft EIS, please contact Osmahn Kadri at the email or mailing address provided above or call 415-522-3617.

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## SUMMARY

The United States (U.S.) General Services Administration (GSA) proposes to expand and modernize the Raul Hector Castro (RHC) Land Port of Entry (LPOE) and construct a new Commercial LPOE in Douglas, Arizona. The RHC LPOE is a port of entry for vehicles and pedestrians crossing the U.S.-Mexico border, between Douglas, Arizona and Agua Prieta, Sonora in Mexico. The port is operated by the U.S. Department of Homeland Security's Customs and Border Protection (CBP) and is a full-service, multi-modal facility where CBP officers inspect commercially owned vehicles (COVs), privately owned vehicles (POVs), and pedestrians. Due to steady increases in traffic, poor pedestrian infrastructure, lack of separations between traffic types (COVs, POVs, and pedestrians), and undersized facilities at the end of their functional lives, the facilities at the RHC LPOE no longer function adequately and pose safety and security risks for CBP officers and the general public. The existing RHC LPOE also has spatial constraints, with limited interior space for offices and processing and limited opportunity for expansion within its current footprint. The City of Douglas has also expressed concerns with hazardous materials utilized in the mining industry being transported across the border in commercial trucks and passing through the urban core of their community. The Proposed Action would address these varied concerns.

## ENVIRONMENTAL REVIEW PROCESS

GSA has prepared this Environmental Impact Statement (EIS) for the purpose of analyzing the potential environmental impacts of the Proposed Action, in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 United States Code 4321 et seq.), the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1508), GSA Order ADM 1095.1F (*Environmental Consideration in Decision Making*), the GSA Public Building Service's *NEPA Desk Guide*, and other relevant federal and state laws and regulations.

A Notice of Intent (NOI) for the EIS was published in the *Federal Register* on July 14, 2022. The NOI announced that a public scoping meeting would take place at the Douglas Visitor Center on August 11, 2022, from 4 p.m. to 6 p.m. and public comments were requested to be received within the 40-day scoping period, no later than August 22, 2022. GSA also published advertisements in English and Spanish and posted announcements on social media sites in the weeks preceding the public scoping meeting. The advertisements were published in the *Herald Review* on July 20, August 3, and August 7, 2022. Announcements were posted on GSA's social media accounts on July 28, 2022. The advertisements and announcements indicated GSA's intent to prepare an EIS and conduct a scoping meeting; provided a brief description of the project; identified the public scoping meeting date, time, and location; and included instructions on submitting a comment.

A Notice of Availability for the Draft EIS (DEIS) was published in the *Federal Register* on January 27, 2023. GSA also announced a public meeting on the DEIS and published advertisements in English and Spanish and social media posts in the weeks preceding the public meeting. The advertisements were published in the *Herald Review* on February 1, 15, and 19, 2023. Announcements were posted on GSA's social media accounts on February 14 and 22, 2023. The City of Douglas also posted announcements of the meeting on the city's website starting on January 27, 2023, and the city's social media accounts on February 15 and 17, 2023. Additionally, GSA mailed letters to federal agencies, state and local agencies, elected officials, and other interested parties. GSA's advertisements, announcements, and letters indicated the availability of the DEIS and intent to conduct a public meeting; identified the public meeting time and location; and included instructions on submitting a comment. GSA accepted comments through March 13, 2023. Comments received during the 45-day comment period have been considered and addressed in this document (see Appendix E).

Since publication of the DEIS, GSA has identified an additional viable alternative for consideration to include expanding east of the RHC LPOE (Alternative 3). Therefore, GSA is re-issuing this revised DEIS

for public review. GSA is soliciting comments from interested persons and stakeholders on this revised DEIS during a 45-day comment period. Similar to the original DEIS, the public was notified of the public meeting for the revised DEIS through publication of a Notice of Availability in the *Federal Register*, as well as multiple other channels of communication, including newspaper ads, letters to interested parties, social media posts, and website postings. Comments received during the 45-day comment period will be considered in preparation of the Final EIS and will be made part of the Administrative Record.

## INTRODUCTION

The RHC LPOE is located in Douglas, Arizona, in the southeastern corner of the state in Cochise County. The existing port is located on approximately 6 acres with facilities owned and managed by GSA and operated by CBP. The RHC LPOE has been operating since 1914, while the construction of the current facility began in the 1930s. The RHC LPOE consists of multiple buildings and structures and paved lots, including the historic Main Building and Garage. The last facility renovations took place in 1993, which included construction of the commercial building and docks. Existing facilities are undersized, at the end of their functional lives, and no longer meet CBP's mission requirements.

GSA is considering acquiring land adjacent to the RHC LPOE to support expansion and has identified a separate site for the location of a proposed Commercial LPOE. The planned site for the proposed Commercial LPOE is approximately 5 miles west of the existing RHC LPOE located off James Ranch Road. The proposed site is undeveloped; the only major infrastructure nearby consists of a U.S. Border Patrol Station built in 2003.

## PURPOSE AND NEED

The purpose of this 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.

In order to bring the RHC LPOE operations in line with CBP's design standards and operational requirements, the project is needed to:

- 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
- Reduce traffic congestion and increase safety for the City of Douglas.

## SUMMARY OF THE PROPOSED ACTION AND ALTERNATIVES

GSA is proposing a two-port solution that would separate the processing of commercial and non-commercial traffic to alleviate the inadequacies of the existing RHC LPOE. This Proposed Action would consist of two main components:

- 1) **Construction of a new Commercial LPOE** – A new, dedicated LPOE would be constructed to process only COVs. The proposed Commercial LPOE site is located 5 miles west of the RHC LPOE; and
- 2) **Expansion and Modernization of the Existing RHC LPOE to a Non-Commercial LPOE** – The existing RHC LPOE would be expanded and modernized. The expanded and modernized facility would be dedicated to processing only POVs (i.e., cars, vans, and buses) and pedestrians.

In the original DEIS, GSA evaluated two action alternatives – Alternatives 1 and 2. Following issuance of the original DEIS in January 2023, GSA identified a third action alternative – Alternative 3 – through

internal scoping. Alternative 1 would involve sequential construction – construction of the new Commercial LPOE first, then phased-construction at the existing RHC LPOE. Alternatives 2 and 3 would involve concurrent construction – construction of the new Commercial LPOE and phased-construction at the existing RHC LPOE at the same time. All three alternatives would require the acquisition of land near the RHC LPOE and involve phased-construction; however, Alternatives 2 and 3 would require additional land acquisition to allow for expansion and modernization activities to occur while the port remains operational. Alternative 1 would acquire adjacent land north of the existing RHC LPOE for expansion. Alternative 2 would acquire the same land as Alternative 1 but would also acquire additional adjacent land to the west of the existing RHC LPOE. Alternative 3 would acquire the same land as Alternative 1 but would also acquire additional adjacent land to the east of the existing RHC LPOE.

Additionally, GSA evaluated sub-alternatives to manage the historic Main Building and Garage. These historic structures, which were constructed in 1933, are listed on the National Register of Historic Places (NRHP). Due to the historic designation, any renovation work to the original buildings would require compliance with the National Historic Preservation Act (NHPA) of 1966 and the U.S. Secretary of the Interior’s *Standards for Rehabilitation*.

GSA also evaluated the No Action Alternative in the EIS. Under the No Action Alternative, GSA would not move forward with either alternative. The No Action Alternative is included and analyzed to provide a baseline for comparison with impacts from the Proposed Action and to satisfy federal requirements for analyzing the “no action” scenario under NEPA.

All new and modernization construction would seek to achieve Leadership in Energy and Environmental Design (LEED) certification at the highest feasible level within reasonable cost, with Gold-level standards at a minimum. The new and modernized facilities would be “net zero ready.” Renewable energy sources would be planned for future installation and provided with minimum infrastructure to accommodate the energy source (e.g., photovoltaics) if GSA decides to install such infrastructure. The new facilities would also comply with the Energy Independence and Security Act (EISA) of 2007. Between EISA 2007 and LEED, the project would adhere to whichever requirements are higher. The project would also adhere to the CEQ’s *Guiding Principles for Sustainable Federal Buildings*. The design team would utilize GSA’s *Guiding Principles Checklist* to track and report compliance.

## **Alternative 1 – Sequential Construction**

### ***Commercial LPOE***

Under Alternative 1, the first stage would be to construct a new Commercial LPOE at an 80.5-acre undeveloped, vacant site. Currently, there are no paved access roads or associated utility infrastructure at the proposed location. The only major infrastructure in the area consists of a U.S. Border Patrol Station. The land is currently owned by the City of Douglas; however, the land would be transferred to GSA prior to the implementation of Alternative 1.

The site layout of the proposed Commercial LPOE is currently in the conceptual phase. The environmental analysis presented in the EIS is based on a theoretical representation of the layout. The exact layout of the Commercial LPOE would be determined by the construction contractor but would be similar in scope to what is described in the EIS. The main facilities of the Commercial LPOE would consist of the following:

- Main Building
- Commercial Vehicle Inspection Lanes
- Commercial Inspection/Staging
- Commercial Inspection Building
- Outbound Inspection
- Indoor Firing Range
- Outbound Support Building
- FMCSA Facility
- Firearms Simulator Building
- Emergency Power
- Kennel
- Parking/Staging
- Vault

Under Alternative 1, construction of the proposed Commercial LPOE is estimated to begin in 2025, with substantial completion anticipated in 2028. Construction would be expected to take place over an approximate 48- to 54-month period. Peak construction (up to 2 years) would require a potential maximum of 100 construction workers; non-peak construction would require approximately 50 construction workers. For operations, it is expected CBP would hire for approximately 100 positions to support the proposed Commercial LPOE.

Under a separate project, the Arizona Department of Transportation would improve (i.e., widen and resurface) and extend James Ranch Road to the project area. Additionally, Cochise County is planning to construct new utility lines near the proposed Commercial LPOE site, also under a separate project. These projects are not affiliated with GSA's Proposed Action but are being planned to support regional future development efforts, such as the proposed Commercial LPOE.

### **RHC LPOE**

Under Alternative 1, expansion and modernization of the existing RHC LPOE would begin after the proposed Commercial LPOE is complete and all commercial operations at the existing RHC LPOE are transferred to the new facility. Following expansion and modernization, the existing RHC LPOE would be dedicated to processing only non-commercial vehicles (cars, vans, and buses) and pedestrians. To the extent practicable, Alternative 1 would be implemented using a phased-construction approach to alleviate potential disruptions at the existing RHC LPOE. The following facilities would be constructed at the existing RHC LPOE:

- A new Main Building, to include 6 pedestrian inspection booths
- Non-Commercial Vehicle Inspection, to include 10 primary lanes and 24 secondary bays
- Headhouse
- 3 Outbound Non-Commercial Vehicle Inspection Lanes
- Outbound Support Building
- FMCSA Bus Inspection Facilities
- Public-Facing/Trusted Traveler Enrollment Center
- Family/UAC Processing Building – includes an outdoor area
- Emergency Power
- Parking

Construction at the RHC LPOE is estimated to begin in 2028, with substantial completion anticipated in 2031. Construction would be expected to take place over an approximate 36- to 42-month period. Peak construction (up to 2 years) would require a potential maximum of 100 construction workers; non-peak construction would require approximately 50 construction workers. For operations, it is expected CBP would hire for approximately 50 additional positions to support the expanded and modernized RHC LPOE.

The Alternative 1 Expansion Area is 2.7 acres of primarily developed area, comprising a small city park, commercial facilities (duty-free store), and a Federal Motor Carrier Safety Administration (FMCSA) facility, which would be demolished, and new facilities would be constructed. The expansion area also includes a segment of Customs Avenue between Pan American Avenue and 1<sup>st</sup> Street that would be permanently closed. Similar to the Commercial LPOE, a conceptual site layout for the modernized existing LPOE was used as a theoretical representation for discussion and environmental analysis for this EIS. The exact layout of the LPOE would be determined by the construction contractor but would be similar in scope to what is described in the EIS.

As portions of the project area fall within a floodplain, standard protocols for flood mitigation and stormwater management would be incorporated into the final design to mitigate against impacts from



flooding. GSA completed a Floodplain Assessment and issued a Statement of Findings for this EIS and is included in Appendix D.

### **Alternatives 1a – 1d: Reuse, Relocate, or Demolish Historic Structures**

Because the existing historic Main Building and Garage are listed on the NRHP, any modifications or potential demolition associated with the historic Main Building and Garage would be required to follow GSA's *Procedures for Historic Properties*. Any changes to the buildings would also follow the Secretary of the Interior's *Standards for the Treatment of Historic Properties* and applicable guidelines.

GSA would manage the historic structures through one of the following sub-alternatives, pending the outcome of ongoing Section 106 consultation with the State Historic Preservation Officer (SHPO) and consulting parties.

- **Alternative 1a: Adaptive Reuse of Historic Structures** – Under this sub-alternative, the historic Main Building and Garage would be carefully integrated into the modernization plans of the RHC LPOE and repurposed into a more current and useful structure. Any remodeling or renovation work would be done in a manner that preserves the cultural and historic significance of these structures.
- **Alternative 1b: Relocation of Historic Structures** – Under this sub-alternative, the historic Main Building and Garage would be relocated to another location. Relocating these structures would most likely require lifting the whole structure intact and transporting it to a new location.
- **Alternative 1c: Demolition of Historic Structures** – Under this sub-alternative, the historic Main Building and Garage would be demolished during the modernization of the RHC LPOE. GSA would consult the SHPO and additional consulting parties to develop an agreement document and appropriate mitigation measures, such as documentation of the structures prior to demolition.
- **Alternative 1d: Combination of Alternative 1a through 1c** – Under this sub-alternative, some combination of adaptive reuse, relocation, or demolition would be selected for the historic Main Building and Garage.

### **Alternative 2 – Concurrent Construction (Westward Expansion)**

Under Alternative 2, GSA proposes to construct the commercial and non-commercial facilities concurrently to expedite construction for the purpose of achieving cost and time efficiencies. The RHC LPOE would continue to operate as usual – including the processing of COVs – while construction activities for the proposed Commercial LPOE at the same location proposed in Alternative 1 and for the expansion and modernization of the RHC LPOE would occur at the same time. As under Alternative 1, a phased-construction plan would be implemented.

Under Alternative 2, construction of the proposed Commercial LPOE and at the RHC LPOE is estimated to begin in 2025, with substantial completion anticipated in 2028. Construction would be expected to take place over an approximate 48- to 54-month period. Peak construction (up to 2 years) would require a potential maximum of 100 construction workers at each location (i.e., a total of 200 construction workers at any given time during peak construction); non-peak construction would require approximately 50 construction workers at each location or a total of 100 construction workers total at both locations.

Because the existing RHC LPOE has limited opportunity for expansion within its current footprint, the expansion area for Alternative 2 includes acquisition of up to approximately 13.9 acres of adjacent land west of the RHC LPOE, in addition to the 2.7-acre expansion area identified under Alternative 1, to facilitate concurrent construction. GSA may also consider acquiring temporary easements from the city for construction laydown areas for portions of this expansion area. The additional area proposed for acquisition is primarily undeveloped land owned by a combination of other federal landowners, the City of Douglas, and private owners; it also includes roadways owned by the City of Douglas or State of Arizona.

Standard protocols for flood mitigation and stormwater management would be incorporated to mitigate against impacts from flooding. The alternative is addressed in Appendix D.

### ***Alternatives 2a – 2d: Reuse, Relocate, or Demolish Historic Structures***

Management of the historic Main Building and Garage would be handled the same as the sub-alternatives described under Alternatives 1a through 1d.

### **Alternative 3 – Concurrent Construction (Eastward Expansion)**

Under Alternative 3, like Alternative 2, GSA proposes to construct the commercial and non-commercial facilities concurrently to achieve cost and time efficiencies. As in the case of Alternative 2, the RHC LPOE would continue to operate during expansion and modernization, and the new Commercial LPOE would be constructed concurrently at the same location as in Alternative 1. A phased-construction plan would also be implemented similar to Alternatives 1 and 2. However, the additional expansion area for Alternative 3 would be acquired adjacent to the east of the RHC LPOE instead of the west.

The construction timeframe under Alternative 3 would be the same as Alternative 2. Construction is estimated to begin in 2025, with substantial completion by 2028. Construction would be expected to take place over an approximate 48- to 54-month period. Peak construction (up to 2 years) would require a potential maximum of 100 construction workers at each location (total of 200 construction workers during peak construction); non-peak construction would require approximately 50 construction workers at each location (total of 100 construction workers).

Similar to Alternative 2, the additional expansion area for Alternative 3 would be acquired because of the limited opportunity for expansion within the current RHC LPOE footprint. The expansion area for Alternative 3 includes approximately 4.4 acres of adjacent land east of the RHC LPOE, which would be acquired in addition to the 2.7-acre expansion area identified under Alternative 1. The additional area proposed for acquisition consists of seven privately owned parcels of commercially-zoned land that are currently developed with approximately 13 buildings and structures that would be demolished, including at least one active business and three residential occupants. The expansion area also includes the segment of Customs Avenue south of 1<sup>st</sup> Street and International Avenue that would be permanently closed.

Standard protocols for flood mitigation and stormwater management would be incorporated to mitigate against impacts from flooding. The alternative is addressed in Appendix D.

### ***Alternatives 3a – 3d: Reuse, Relocate, or Demolish Historic Structures***

Management of the historic Main Building and Garage would be handled the same as the sub-alternatives described under Alternatives 1a through 1d.

### **No Action Alternative**

Under the No Action Alternative, there would be no construction of a new Commercial LPOE, and expansion and modernization of the RHC LPOE would not occur. Any type of modification to the existing port would be limited to minor repairs and maintenance, as needed. The operation of the RHC LPOE would generally remain as it currently does, but the capacity and efficiency of the port would likely degrade over time due to increased traffic demand. In general, this alternative would not meet the Purpose and Need of the Proposed Action.

## **IMPACT COMPARISON MATRIX**

This EIS evaluates the potential impacts on the environmental conditions from implementing the Proposed Action's Alternatives 1, 2, and 3, as well as the No Action Alternative. For each resource area analyzed in this EIS, the expected consequences of the alternatives and impact reduction measures are summarized in Table S-1.

**Table S-1. Summary Comparison of Alternatives**

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<b>Cultural Resources</b>			
<p><b>Construction:</b> For both LPOE sites, adverse effects under NHPA and direct, significant adverse impacts could occur under NEPA to cultural resources if unanticipated discoveries are encountered during ground-disturbing activities. Ground-disturbing activities would occur within undeveloped, vacant 80.5 acres at proposed Commercial LPOE and highly developed 2.7-acre expansion area for RHC LPOE. Implementation of archaeological monitoring plan and impact reduction measures would mitigate any potential adverse effects and reduce impacts to less-than-significant levels. Regarding architectural properties, GSA recommended 2 buildings located in the RHC LPOE Alternative 1 Expansion Area as not eligible for inclusion in NRHP; SHPO concurred with GSA's finding on one of two buildings. GSA is continuing seeking concurrence with SHPO on GSA's findings based on a revised cultural study. Refer to Alternatives 1a – 1d for discussion of adverse effects to historic Main Building and Garage.</p> <p><b>Operations:</b> No adverse effects under NHPA and no significant impacts to cultural resources during the operational phase would be expected.</p> <p><b>Alternatives 1a – 1d:</b> Alternative 1a – no adverse effects under NHPA and direct, negligible, adverse impacts under NEPA. Alternative 1b – adverse effects under NHPA and direct, significant, adverse, and permanent impacts under NEPA. Alternative 1c – direct adverse effects under NHPA and direct, significant, adverse, and permanent impacts under NEPA. Alternative 1d – direct</p>	<p><b>Construction:</b> At proposed Commercial LPOE and existing RHC LPOE (including Alternative 1 Expansion Area), similar impacts as Alternative 1. At Alternative 2 Expansion Area, ground-disturbing activities would occur within an additional 13.9 acres of mainly undeveloped but previously disturbed land. Implementation of archaeological monitoring plan and impact reduction measures would mitigate any potential adverse effects and reduce impacts to less-than-significant levels. Regarding architectural properties, similar impacts as discussed under Alternative 1; additionally, GSA recommended another building located in the RHC LPOE Alternative 2 Expansion Area as not eligible for inclusion in NRHP; SHPO concurred with GSA's finding for this building.</p> <p><b>Operations:</b> Similar to Alternative 1, no adverse effects under NHPA and no impacts to cultural resources during the operational phase would be expected.</p> <p><b>Alternatives 2a – 2d:</b> Potential impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p><b>Construction:</b> At proposed Commercial LPOE and existing RHC LPOE (including Alternative 1 Expansion Area), similar impacts as Alternative 1. At RHC LPOE Alternative 3 Expansion Area, ground-disturbing activities would occur within an additional 4.4 acres of previously disturbed land containing 13 buildings, plus graded and/or paved lots. Implementation of archaeological monitoring plan and impact reduction measures would mitigate any potential adverse effects and reduce impacts to less-than-significant levels. Regarding architectural properties, similar impacts as discussed under Alternative 1; additionally, GSA is recommending another six buildings located in the RHC LPOE Alternative 3 Expansion Area as not eligible for inclusion in NRHP and is seeking concurrence with SHPO on GSA's findings based on a revised cultural study.</p> <p><b>Operations:</b> Similar to Alternative 1, no adverse effects under NHPA and no impacts to cultural resources during the operational phase would be expected.</p> <p><b>Alternatives 3a – 3d:</b> Potential impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p>No adverse effects to historic properties and no adverse impacts to cultural resources would be expected.</p>

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<p>adverse effects under NHPA and direct, minor to significant, adverse, and permanent impacts under NEPA. For Alternatives 1b, 1c and 1d, GSA would be required to develop measures to avoid, minimize, or mitigate adverse effects on these historic properties, which would result in less-than-significant impacts under NEPA and would resolve effects under NHPA.</p>			
<p><b>Impact Reduction Measures:</b> Prior to construction, GSA would implement the following measures:</p> <ul style="list-style-type: none"> <li>• Develop an archaeological monitoring plan in consultation with SHPO, ACHP, federally recognized Indian tribes, and other consulting parties to reduce impacts from ground-disturbing activities.</li> <li>• Identify and develop appropriate mitigation measures to avoid, minimize or mitigate adverse effects on historic properties in consultation with SHPO and other applicable consulting parties. At a minimum, Historic American Buildings Survey documentation for the historic Main Building and Garage would be considered. Additional mitigation could include architectural artifact salvage. Appropriate mitigation would be determined in consultation between GSA, SHPO, and consulting parties.</li> </ul>			
<p><b>Air Quality and Greenhouse Gas Emissions</b></p>			
<p><b>Construction:</b> For both LPOE sites, short-term, minor adverse impacts on regional air quality due to dust and emissions from construction equipment and vehicles; emissions would not exceed <i>de minimis</i> thresholds for any criteria pollutants. Negligible increases in GHGs.</p> <p><b>Operation:</b> For both sites, long-term, minor adverse impact on air quality due to emissions from onsite equipment and increased commuter vehicles; long-term, minor beneficial impact to air quality from reduced POV wait times; long-term, minor indirect adverse air quality impact due to increased POVs from increased efficiency of the RHC LPOE. Long-term, minor adverse impacts to GHGs from onsite equipment and increased commuter traffic; however, adverse impacts offset by modernized, more sustainable facilities. Negligible air quality impacts at Commercial LPOE from operation of firing range.</p>	<p><b>Construction:</b> Potential impacts similar to Alternative 1 but would occur over a shorter period and be greater in intensity. Impacts would be short-term, minor and adverse; emissions would not exceed <i>de minimis</i> thresholds for any criteria pollutants. Negligible increases in GHGs.</p> <p><b>Operations:</b> Potential impacts would be same as Alternative 1.</p> <p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p><b>Construction:</b> Potential impacts comparable to Alternative 2. Impacts would be short-term, minor and adverse; emissions would not exceed <i>de minimis</i> thresholds for any criteria pollutants. Negligible increases in GHGs.</p> <p><b>Operations:</b> Potential impacts would be same as Alternative 1.</p> <p><b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p>Short-term, minor adverse impacts from ongoing maintenance at RHC LPOE. Long-term, minor adverse impacts due to degradation of capacity and efficiency of operations, resulting in longer wait times and congestion at the RHC LPOE and greater POV emissions.</p>

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<p><b>Alternatives 1a – 1d:</b> Potential impacts already considered under Alternative 1 analysis. Compared to Alternatives 1a and 1b, impacts under Alternatives 1c and 1d would be greater due to demolition activities and additional trucks hauling debris.</p>			
<p><b>Impact Reduction Measures:</b> The following measures would be implemented during construction:</p> <ul style="list-style-type: none"> <li>• Precautions to prevent PM from becoming airborne, such as using water on dirt roads or clearing land.</li> <li>• Additional measures to control fugitive dust, such as installing wind fencing and operating water trucks for stabilization of surfaces under windy conditions.</li> <li>• Source-specific controls to minimize emissions during construction activities, such as reducing unnecessary idling from heavy-duty equipment.</li> <li>• Administrative controls, such as preparing an inventory of all equipment prior to construction and identifying the suitability of add-on emission controls for each piece of equipment before groundbreaking.</li> </ul> <p>To minimize impacts of climate change on human health and safety, implementation of climate change adaptation measures in the project design phase, such as, incorporating shaded areas wherever possible.</p> <p>To minimize impacts of climate change on energy resources, implementation of climate change adaptation measures in the project design phase, such as implementing measures to maximize energy efficiency where possible.</p> <p>To minimize impacts of climate change on water resources, design with a minimum of LEED Gold certification for the proposed facilities, which would incorporate water conservation and efficiency measures.</p> <p>Refer to Section 3.3, Air Quality and Greenhouse Gas Emissions in the EIS for the full list of impact reduction measures that would be considered.</p>			
<p><b>Land Use and Visual Resources</b></p>			
<p><b>Construction:</b> For both LPOE sites, short-term, minor adverse impacts to adjacent land uses due to construction activities from dust, traffic, noise, road delays, and access limitation. At the RHC LPOE, long-term, moderate, adverse impacts for the businesses on 1<sup>st</sup> Street from permanent closure of Customs Avenue between Pan American Avenue and 1<sup>st</sup> Street requiring the relocation of traffic access and relocation of an existing bus stop. Long-term, minor adverse impacts from permanent loss of a city park. Temporary absence of a duty-free shop at the RHC LPOE. At proposed Commercial LPOE, short-term, moderate adverse impacts to visual resources; at the RHC LPOE, short-term, minor adverse impacts to visual resources.</p>	<p><b>Construction:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar impacts to land use and visual resources as Alternative 1, but to greater extent from larger additional expansion area.</p> <p><b>Operations:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar land use and visual impacts as Alternative 1, but to greater extent from larger additional expansion area, including loss of trails from Paseo de las Americas Linear Park (minor adverse impact) and conversion of land with illicit construction debris dumping (minor beneficial impact).</p>	<p><b>Construction:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar impacts to land use and visual resources as Alternative 1, but to greater extent from larger additional expansion area. Acquisition of 7 parcels zoned commercial would permanently displace at least one active business and 3 residential occupants, and eliminate ongoing storage uses by other commercial owners, which would cause long-term, direct, moderate adverse impacts.</p> <p><b>Operations:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar land use and visual impacts as Alternative 1, but to greater extent from larger additional expansion</p>	<p>Long-term minor to moderate adverse land use impacts from COV traffic remaining in city and conflicting with city's long-term revitalization plans. Long-term, minor adverse visual resources impacts from continuation of deterioration of facilities at RHC LPOE and</p>

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<p><b>Operations:</b> Permanent, moderate beneficial impacts to land use from aligning with long-term land use planning goals at both LPOE sites; long-term, moderate, beneficial, indirect impacts to land use at the RHC LPOE from potential future repurposing of existing warehouse district by the city. Permanent, minor to moderate adverse visual impacts from distinct visual change and from lighting at the proposed Commercial LPOE; permanent, minor beneficial visual impacts from newly constructed buildings at the RHC LPOE.</p> <p><b>Alternatives 1a – 1d:</b> Potential impacts already considered in analysis for RHC LPOE footprint. Long-term, negligible to moderate beneficial visual impact from potential remodeling or renovation work on the historic structures under Alternatives 1a and 1b.</p>	<p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p>area and permanent loss of commercial and residential uses on the expansion area.</p> <p><b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p>increasing traffic congestion.</p>
<p><b>Impact Reduction Measures:</b> Regarding land use, consideration of local zoning laws and all design requirements of state and local governments to the extent practicable, including both the incorporation of exterior design elements to reflect the unique character of the area and the emphasis on pedestrian circulation and amenities, to the extent practicable and consistent with GSA design standards.</p> <p>Regarding visual resources, implementing the following measures:</p> <ul style="list-style-type: none"> <li>• Consult with local officials, consider local requirements, and comply with building codes to the maximum extent practicable.</li> <li>• Integrate its programs of design/architecture and construction excellence into the new facility in order to optimize building performance and aesthetics.</li> <li>• Design exterior lighting to meet physical security requirements but controlled to minimize light trespass (e.g., direct light downward and minimize glare). Exterior lighting would be consistent with the local ordinance code for outdoor lighting to the extent possible.</li> <li>• Incorporate landscaping and screening into the exterior design consistent with GSA's Urban Development/Good Neighbor Program.</li> </ul> <p>Also refer to impact reduction measures under Air Quality and Greenhouse Gas Emissions; Transportation and Traffic, and Noise for measures to reduce construction impacts on land use-related concerns related to fugitive dust, traffic, and noise.</p>			
<p><b>Geology and Soils</b></p>			
<p><b>Construction:</b> For both LPOE sites, minor adverse impacts on geology and negligible adverse impacts on topography. At proposed Commercial LPOE, permanent, moderate adverse impacts to soils from disturbing 80.5 acres; at RHC LPOE, permanent, minor</p>	<p><b>Construction:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar impacts to geology and soils as Alternative 1, but to greater extent from larger expansion area (13.9 additional acres), resulting in permanent, minor to moderate adverse soil impacts.</p>	<p><b>Construction:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar impacts to geology and soils as Alternative 1, but to greater extent from larger expansion area (4.4 additional acres), resulting in permanent, minor to moderate adverse soil impacts.</p>	<p>No impacts to geology or topography would be expected. Negligible impacts to soils could occur due to land</p>

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<p>adverse impacts to soils from disturbing 8.8 acres.</p> <p><b>Operations:</b> No impacts to geology or topography. At proposed Commercial LPOE, long-term, minor, adverse, and indirect impacts to soils due to erosion. At the RHC LPOE, potential addition of up to 0.4 acres of impervious surfaces, resulting in long-term, negligible, adverse, and indirect impacts due to soil erosion.</p> <p><b>Alternatives 1a – 1d:</b> Potential impacts already considered in analysis for RHC LPOE footprint.</p>	<p><b>Operations:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar impacts to geology and soils as Alternative 1 (from up to 0.4 acres of additional impervious surface area). The larger expansion area would result in a potential increase of up to 13.9 acres of additional impervious surfaces, resulting in long-term, minor, adverse, and indirect impacts due to soil erosion.</p> <p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p><b>Operations:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar impacts to geology and soils as Alternative 1 (up to 0.4 acres of additional impervious surface area). The larger expansion area would result in a potential increase of up to 1.4 acres of additional impervious surfaces (not already developed, graded, or paved), resulting in long-term, minor, adverse, and indirect impacts from soil erosion.</p> <p><b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p>disturbance and soil erosion from ongoing maintenance activities.</p>
<p><b>Impact Reduction Measures:</b> Measures to reduce construction impacts on geology and soil-related concerns such as soil erosion, loss, and stability would be addressed in the design, grading and drainage plan, and the Arizona Stormwater CGP.</p>			
<p><b>Water Resources</b></p>			
<p><b>Construction:</b> At proposed Commercial LPOE, short-term, minor, direct adverse, and indirect impacts to surface waters and groundwater from sedimentation and contamination, and from groundwater use of a water well planned by the city.</p> <p>At RHC LPOE, short-term, minor, adverse, and indirect impacts to surface waters and groundwater from sedimentation and contamination, and from groundwater used during construction. Long-term, minor, adverse, direct and indirect impacts from construction within floodplains: 0.07 acre of 100-year floodplain inside RHC LPOE boundary; 4.98 acres of 500-year floodplain in RHC LPOE and separate LPOE parking area; and 2.04 acres of 500-year floodplain in Alternative 1 Expansion Area. See Appendix D.</p> <p><b>Operations:</b> At proposed Commercial LPOE, long-term, minor, adverse, and indirect</p>	<p><b>Construction:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar impacts to water resources as Alternative 1, but to greater extent from larger additional expansion area: short-term, minor, adverse, and indirect impacts from sedimentation and contamination, and construction near riverine feature (inside expansion area boundary); and long-term, minor, adverse, direct and indirect impacts from construction within floodplain. In addition to the acreages for Alternative 1, an increase of 0.63 acre of 100-year floodplain and 1.1 acres of 500-year floodplain are located in Alternative 2 Expansion Area. See Appendix D.</p> <p><b>Operations:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar water resources impact as Alternative 1, but to greater extent from</p>	<p><b>Construction:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar impacts to water resources as Alternative 1, but to greater extent from larger additional expansion area: short-term, minor, adverse, and indirect impacts from sedimentation and contamination, and construction near riverine feature (inside expansion area boundary); and long-term, minor, adverse, direct and indirect impacts from construction within floodplain. In addition to the acreages for Alternative 1, an increase of 0.46 acre of 100-year floodplain and 3.91 acres of 500-year floodplain are located in Alternative 3 Expansion Area. See Appendix D.</p> <p><b>Operations:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar water resources impact as Alternative 1, but to greater extent from</p>	<p>Long-term, negligible impacts to surface waters due to runoff during ongoing maintenance activities. No impacts to groundwater, floodplains, and wetlands.</p>

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<p>impacts to water resources due to increases in stormwater runoff, decreases in groundwater recharge, potential sedimentation or contamination, and from groundwater usage.</p> <p>Impacts would be similar at RHC LPOE, although it would be long-term, negligible to minor, and adverse.</p> <p><b>Alternatives 1a – 1d:</b> Potential impacts already considered under Alternative 1 analysis.</p>	<p>larger additional expansion area; long-term, minor, adverse, and indirect impacts to surface water from increase in runoff and downstream water quality degradation.</p> <p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p>larger additional expansion area; long-term, minor, adverse, and indirect impacts to surface water from increase in runoff and downstream water quality degradation.</p> <p><b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	
<p><b>Impact Reduction Measures:</b></p> <ul style="list-style-type: none"> <li>• Obtaining a minimum LEED Gold certification may include WCMs, such as low-flow fixtures and installing a retention system to control stormwater.</li> <li>• A minimum Sustainable Sites Initiative (SITES) silver rating is required for project design to manage stormwater and conserve water.</li> <li>• Compliance with impact reduction measures and BMPs as outlined in the Arizona Stormwater CGP and the Cochise County Stormwater Ordinance.</li> <li>• GSA would coordinate with USACE as applicable with respect to potential impacts to WOTUS, to include determining possible permitting requirements.</li> </ul>			
<p><b>Biological Resources</b></p>			
<p><b>Construction:</b> Proposed Action is unlikely to adversely affect any listed species. At proposed Commercial LPOE, permanent, moderate, adverse direct impacts to biological resources from ground disturbance, grading/clearing activities, and conversion of undeveloped land to new structures causing habitat fragmentation and displacement. Short-term, moderate, adverse, and indirect impacts from increased level of human activities. At RHC LPOE, short-term, minor, adverse and indirect impacts to biological resources from increased levels of human activities in a currently developed area.</p> <p><b>Operations:</b> At proposed Commercial LPOE, long-term, moderate, adverse, and indirect effects to species from noise, lighting, spread of non-native species, or accidental mortality of species. At RHC LPOE, long-term, negligible, beneficial, indirect impacts due to</p>	<p><b>Construction:</b> Proposed Action is unlikely to adversely affect any listed species. At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar adverse impacts to biological resources as Alternative 1, but to greater extent from larger additional expansion area – permanent, moderate, adverse, and direct impacts from ground disturbance and grading/clearing activities on undeveloped land (much of which has been disturbed previously). Indirect impacts would be greater than Alternative 1 due to concurrent construction – temporary, moderate, indirect adverse impacts regionally from increased levels of human activities.</p> <p><b>Operations:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, long-term, minor, adverse, and indirect impacts from increased human</p>	<p><b>Construction:</b> Proposed Action is unlikely to adversely affect any listed species. At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar adverse impacts to biological resources as Alternative 1 in an additional expansion area that has been mostly cleared/graded, paved, and/or developed with buildings and structures (i.e., permanent, minor, adverse, and direct impacts). Indirect impacts would be greater than Alternative 1 due to concurrent construction (i.e., temporary, moderate, indirect adverse impacts regionally from increased levels of human activities).</p> <p><b>Operations:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, long-term, negligible, adverse, and indirect impacts from increased human presence in previously disturbed and developed land east of the RHC LPOE.</p>	<p>Negligible, adverse, indirect impacts on biological resources due to ongoing maintenance activities.</p>



Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<p>removal of COVs and associated noise and traffic.</p> <p><b>Alternatives 1a – 1d:</b> Potential impacts already considered under Alternative 1 analysis.</p>	<p>presence in the previously disturbed but undeveloped land west of the RHC LPOE.</p> <p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p><b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	
<p><b>Impact Reduction Measures:</b></p> <ul style="list-style-type: none"> <li>• Only approved, native species would be used for revegetation. These plant species would not be invasive or noxious species, and disturbed areas would be restored or revegetated to the extent practicable following construction.</li> <li>• Construction equipment would be washed before and after coming to the site to the extent practicable to limit the transport of invasive species.</li> </ul>			
<p><b>Transportation and Traffic</b></p>			
<p><b>Construction:</b> Overall, short-term, minor adverse impacts to transportation resources (SR-80, US-191, and Pan American Avenue) from increased construction-related traffic. At the RHC LPOE, a long-term, negligible to minor, adverse impact on local roadways from permanent closure of Customs Avenue between Pan American Avenue and 1<sup>st</sup> Street. Temporary, minor adverse impacts to pedestrian facilities from walkway closures.</p> <p><b>Operations:</b> Overall, long-term, minor adverse impacts to transportation resources (SR-80 and US-191). For the City of Douglas, long-term, beneficial direct impact from relocation of COVs; long-term, minor to moderate, adverse, and indirect impact from increased efficiency of the RHC LPOE and an estimated 2% annual growth rate in POV traffic.</p> <p><b>Alternatives 1a – 1d:</b> Potential impacts already considered under Alternative 1 analysis. Temporary, minor adverse impacts under Alternatives 1c and 1d from additional trucks hauling debris during construction.</p>	<p><b>Construction:</b> Potential impacts similar to Alternative 1 but overlap of construction traffic from both LPOE sites would occur. Overall, short-term, minor to moderate adverse impacts to transportation resources (SR-80, US-191, and Pan American Avenue) from increased construction-related traffic. Similar adverse impacts to pedestrian facilities as Alternative 1 would occur at the RHC LPOE and additional expansion area.</p> <p><b>Operations:</b> Similar impacts as Alternative 1.</p> <p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p><b>Construction:</b> Potential impacts similar to Alternative 2. Overall, short-term, minor to moderate adverse impacts to transportation resources (SR-80, US-191, and Pan American Avenue) from increased construction-related traffic. Permanent closure of Customs Avenue east of the RHC LPOE and International Avenue south of the eastern expansion area would not add substantially to the impacts of Alternative 1 on local traffic. Similar adverse impacts to pedestrian facilities as Alternative 1 would occur at the RHC LPOE and additional expansion area.</p> <p><b>Operations:</b> Similar impacts as Alternative 1. After the relocation of COV traffic to the new Commercial LPOE, the closure of additional road segments for Alternative 3 would not be expected to affect adjacent roadways.</p> <p><b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p>Long-term, minor to moderate adverse impacts to transportation and traffic from increased traffic volumes, COV traffic remaining through the City of Douglas, and inefficient operations at RHC LPOE.</p>
<p><b>Impact Reduction Measures:</b></p> <ul style="list-style-type: none"> <li>• Minimize construction vehicle movement during peak traffic hours.</li> <li>• Place construction staging areas where they would least interfere with local traffic and parking.</li> </ul>			

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<ul style="list-style-type: none"> <li>• Minimize construction detours and impacts to pedestrians.</li> <li>• Develop a construction traffic and parking management plan in coordination with local officials and local business directly affected by street closures.</li> <li>• Develop and implement Transportation Demand Management strategies.</li> <li>• Implement traffic signal coordination on arterial streets where practical.</li> <li>• Coordinate with local, state, and federal transportation authorities when planning access to the RHC LPOE site.</li> </ul>			
<b>Noise</b>			
<p><b>Construction:</b> At the proposed Commercial LPOE, short-term, minor to moderate adverse noise impacts from construction activities and from COVs along transportation routes (SR-80 and US-191); closest three residential properties to proposed site are approximately 2,500 feet (one property) and 5,500 feet (two properties) to the north. At the RHC LPOE, short-term, minor to moderate adverse noise and vibration impacts from construction activities and from trucks along transportation routes (SR-80, US-191, and Pan American Avenue). Outdoor intermittent noise levels at closest residences on 1<sup>st</sup> Street of 86 to 88 dBA, and 68 dBA for closest residences on 3<sup>rd</sup> Street. Inside intermittent noise levels of 71 to 73 dBA (1<sup>st</sup> Street) and 53 dBA (3<sup>rd</sup> Street).</p> <p><b>Operations:</b> At the proposed Commercial LPOE, permanent, moderate adverse noise impacts to closest receptors (three residences within 1 mile) and to receptors along SR-80 and US-191. At the RHC LPOE, long-term beneficial noise impacts for receptors in City of Douglas from removal of COVs; long-term, minor indirect adverse noise impact from increased efficiency of the RHC LPOE and an estimated 2% annual growth in POV traffic.</p> <p><b>Alternatives 1a – 1d:</b> Potential impacts already considered under Alternative 1 analysis. Type and intensity of noise impact depends on sub-alternative but would range</p>	<p><b>Construction:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At the RHC LPOE, types of noise sources similar to Alternative 1; however, intensity of noise levels greater due to COV processing remaining onsite during construction at RHC LPOE, resulting in short-term, intermittent, moderate adverse noise impacts to same noise receptors identified under Alternative 1.</p> <p><b>Operations:</b> Similar impacts as Alternative 1.</p> <p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p><b>Construction:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At the RHC LPOE, impacts would be similar to Alternative 2 (including Alternative 1 impacts). However, demolition and construction at the Alternative 3 Expansion Area would occur closer to the downtown area, affecting sensitive noise receptors northeast of the RHC LPOE. Overall, Alternative 3 would have short-term, intermittent, moderate adverse noise impacts to receptors identified under Alternative 1, except for the commercial and residential receptors that would be displaced by acquisition of the Alternative 3 Expansion Area.</p> <p><b>Operations:</b> Similar impacts as Alternative 1.</p> <p><b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p>Long-term, minor to moderate adverse impacts to noise from ongoing maintenance activities at the RHC LPOE and from COV traffic remaining through the City of Douglas.</p>

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
from temporary negligible to temporary minor, adverse impacts.			
<p><b>Impact Reduction Measures:</b></p> <ul style="list-style-type: none"> <li>• Implementation of noise control measures, such as project scheduling, noise barriers, and using noise controls on equipment (e.g., mufflers).</li> <li>• Conduct construction activities within hours that are in accordance with local noise ordinances to the extent practicable.</li> <li>• If a variation from normal construction hours is required, a variance permit from the City of Douglas or Cochise County may be required.</li> <li>• Provide notification to properties adjacent to the project boundary in advance of times of peak construction when the use of loudest equipment would be used for longer periods of time.</li> </ul>			
<b>Infrastructure and Utilities</b>			
<p><b>Construction:</b> At the proposed Commercial LPOE, short-term, moderate adverse impacts to West International Avenue from construction activities at the site; and short-term, negligible adverse impacts to public utilities from increased demands for construction. At the RHC LPOE, short-term, moderate adverse impacts on facilities and roadway network from construction activities; short-term, negligible adverse impacts to utilities from increased demand; and intermittent, minor adverse impacts from potential service disruptions.</p> <p><b>Operations:</b> At the proposed Commercial LPOE, long-term, moderate beneficial impacts to facilities from new infrastructure and utilities; long-term negligible to minor adverse impacts to public utilities from increased demand. At the RHC LPOE, long-term moderate beneficial impacts from new, improved infrastructure and long-term, negligible to minor adverse impacts to utilities from increased demand.</p> <p><b>Alternatives 1a – 1d:</b> Potential impacts already considered under Alternative 1 analysis. Type and extent of impacts dependent on sub-alternative chosen; range of impacts includes temporary, negligible to</p>	<p><b>Construction:</b> Potential adverse impacts similar as Alternative 1 at both LPOE locations, but slightly greater due to greater demand on utilities from concurrent construction and additional utility coordination due to natural gas utilities located in the Alternative 2 Expansion Area, resulting in short-term, negligible adverse impacts to utilities. Impacts to facilities would be similar to Alternative 1, but only minor adverse due to shorter construction period.</p> <p><b>Operations:</b> Potential beneficial impacts to facilities comparable to Alternative 1. Potential negligible to minor adverse impacts similar as Alternative 1. At the RHC LPOE, long-term, negligible to minor, adverse impacts to water/wastewater systems and stormwater system from increased demand and runoff, respectively.</p> <p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p><b>Construction:</b> Potential adverse impacts comparable to Alternative 2 at both LPOE locations, but slightly greater at the RHC LPOE because of need for additional coordination with service providers during demolition and construction of infrastructure and utilities at the Alternative 3 Expansion Area. Overall, short-term, minor, and adverse.</p> <p><b>Operations:</b> Potential beneficial impacts to facilities comparable to Alternative 1. Potential negligible to minor adverse impacts to utilities similar to Alternative 1. At the RHC LPOE, long-term, negligible to minor, adverse impacts depending on the extent of redevelopment and need for stormwater structures and BMPs.</p> <p><b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p>Long-term, minor to moderate adverse impacts from ongoing demand on and degradation of infrastructure and utilities; increased need for maintenance as building systems continue to age.</p>

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<p>minor adverse impacts on utilities from potential service disruption to users.</p>			
<p><b>Impact Reduction Measures:</b></p> <ul style="list-style-type: none"> <li>• Adherence to GSA’s P100 Standards (Facilities Standards for the Public Buildings Service).</li> <li>• Buildings would be “net zero” ready on a source energy basis with onsite renewables for future installation.</li> <li>• Coordinating with utility providers in advance by implementing measures to protect utility lines or by arranging for their temporary or permanent relocation.</li> </ul>			
<p><b>Socioeconomics</b></p>			
<p><b>Construction:</b> Overall, short-term, negligible impacts on population and housing; up to 100 workers would be directly hired, but mostly not expected to relocate to area. Short-term, minor, beneficial, and direct impact on unemployment and income from job creation. Short-term, moderate to significant, beneficial, and indirect impact from materials and equipment purchases, as well as indirect and induced job creation from wages spent in local economy. Temporary, minor adverse impacts on local businesses adjacent to RHC LPOE as commercial operations relocate to proposed Commercial LPOE. Long-term, minor, adverse impact for the businesses on 1<sup>st</sup> Street from the closure of Customs Avenue and the relocation of a bus stop. Temporary, minor adverse impacts to nearby neighborhoods from decreased quality of life due to increased noise levels, air pollutants, and traffic associated with construction.</p> <p><b>Operations:</b> Long-term, negligible to minor, beneficial, and direct impacts to population and housing from an additional 150 workers hired. Long-term, moderate to significant, beneficial, and direct impacts to labor and earnings from additional \$10.8 to \$20 million to revenue per year to City of Douglas and Cochise County. Long-term minor to moderate, beneficial, direct and indirect impact on unemployment in all industries in Cochise</p>	<p><b>Construction:</b> Overall, similar socioeconomic impacts as Alternative 1, except up to 200 workers would be hired at one time. Spending on labor and materials would be similar but likely less than under Alternative 1, due to decreased cost escalation and inflationary pressures as a result of the compressed project timeline. Impacts would be greater in the near term, but would occur for a shorter duration than under Alternative 1.</p> <p><b>Operations:</b> Same impacts as Alternative 1.</p> <p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p><b>Construction:</b> Overall, similar socioeconomic impacts as Alternative 2. Acquisition of Alternative 3 Expansion Area would displace at least one active business, 3 residential occupants, and various ongoing storage uses on properties owned by other businesses, which would have direct, short- to long-term, minor to moderate adverse impacts. In addition to impacts described for Alternative 1, demolition and construction in the Alternative 3 Expansion area could intermittently impede access to logistics businesses on the north side of 1<sup>st</sup> Street, which would be short-term, minor to moderate and adverse.</p> <p><b>Operations:</b> Same impacts as Alternative 1.</p> <p><b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p>Long-term, minor adverse socioeconomic impacts to businesses and regional economy from loss of RHC LPOE capacity and efficiency over time and from COVs remaining in the City of Douglas, hindering revitalization plans and economic growth. Potential short-term and long-term socioeconomic benefits from direct, indirect, and induced jobs from the Proposed Action would not occur.</p>

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<p>County. Long-term, moderate to significant, beneficial, and indirect impacts from commercial and industrial business growth around the Commercial LPOE. Long-term, minor to moderate, beneficial impacts to quality of life in the City of Douglas from removal of COVs. Long-term, minor adverse impacts from increasing population and contributing to unfavorable student-to-teacher ratios.</p> <p><b>Alternatives 1a – 1d:</b> Potential impacts already considered under Alternative 1 analysis.</p>			
<p><b>Impact Reduction Measures:</b> No specific impact reduction measures would be applicable to Socioeconomics.</p>			
<p><b><i>Environmental Justice and Protection of Children’s Health and Safety</i></b></p>			
<p><b>Construction:</b> No disproportionately high and adverse impacts to minority or low-income populations. At the proposed Commercial LPOE, potential adverse impacts to minority populations from short-term, minor increases in air pollutants, traffic congestion, and noise, and short-term, minor beneficial impacts from increased job opportunities. At the RHC LPOE, potential adverse impacts to minority and low-income populations from short-term, minor increases in air pollutants, traffic congestion, and noise, and short-term, minor beneficial impacts from increased job opportunities. Short-term, negligible to minor, and short-term, minor to moderate adverse impacts to child populations, respectively, at the proposed Commercial LPOE and RHC LPOE due to increased air pollutants, traffic congestion, and noise.</p> <p><b>Operations:</b> No disproportionately high and adverse impacts to minority or low-income populations. At the proposed Commercial LPOE site, adverse impacts to minority populations from short-term, minor increased</p>	<p><b>Construction:</b> Similar impacts as Alternative 1 with respect to environmental justice and child populations. No disproportionately high and adverse impacts to minority or low-income populations. Impacts to environmental justice and child populations would be shorter duration than Alternative 1; however, air pollutants, traffic, and noise have greater intensity than Alternative 1.</p> <p><b>Operations:</b> Similar impacts as Alternative 1 with respect to environmental justice and child populations. No disproportionately high and adverse impacts to minority or low-income populations. Alternative 2 Expansion Area is greater than for Alternative 1, so extent of impacts would be greater; additional loss of trails of Paseo de Las Americas Linear Park.</p> <p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p><b>Construction:</b> Acquisition of three residences in the Alternative 3 Expansion Area would displace occupants in an area characterized by high concentrations of minority and low-income populations. Although not significant at a population level, environmental justice impacts may be greater for Alternative 3 than for the other alternatives. Similarly, the potential displacement for Alternative 3 of families with children living in the residences may affect the health and safety of child populations in the area more adversely than would the other alternatives. GSA would negotiate with private landowners as applicable during the land acquisition process to provide fair compensation. Otherwise, impacts during construction of Alternative 3 would be similar as described for Alternative 1 both for the Commercial LPOE and RHC LPOE.</p> <p><b>Operations:</b> Similar impacts as Alternative 1 with respect to environmental justice and child populations. No disproportionately</p>	<p>No impacts to environmental justice or child populations, although potential beneficial impacts from removal of COVs through the city and from increased job opportunities would not occur.</p>

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<p>air pollutants, COV traffic, and associated noise. Long-term, negligible to moderate beneficial impacts to low-income and minority populations from increased job opportunities. Overall negligible adverse impacts to child populations. At the RHC LPOE, long-term, minor beneficial impacts from removal of COVs (improved air quality, congestion and noise) and job opportunities; permanent, minor adverse impacts to minority and low-income populations from loss of recreational space; negligible to minor beneficial and adverse impacts to child populations from removal of COVs.</p> <p><b>Alternatives 1a – 1d:</b> Potential impacts already considered under Alternative 1 analysis.</p>		<p>high and adverse impacts to minority or low-income populations. Alternative 3 Expansion Area is greater than for Alternative 1, so extent of impacts would be greater.</p> <p><b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	
<p><b>Impact Reduction Measures:</b> Impact reduction measures for resources specific to environmental justice – i.e., air pollutants, traffic, and noise – are discussed in the respective resource areas (Air Quality and Greenhouse Gas Emissions; Transportation and Traffic; and Noise).</p>			
<p><b>Human Health and Safety</b></p>			
<p><b>Construction:</b> At both LPOEs, short-term, negligible adverse impacts to worker safety from construction activities; short-term, negligible to minor adverse impacts from hazardous materials and waste handling.</p> <p><b>Operations:</b> At proposed Commercial LPOE, long-term, negligible adverse effects on human health and safety from hazardous materials and waste handling. At the RHC LPOE, long-term, minor to moderate beneficial impacts on human health and safety of CBP workers and the public from the relocation of COVs and reconfiguration of POV and pedestrian routing within the RHC LPOE. Negligible adverse effects on human health and safety and from hazardous materials and waste handling.</p>	<p><b>Construction:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At the RHC LPOE, adverse impacts to human health and safety from hazardous materials and waste handling would be similar but would be greater due to greater acreage of expansion area and higher potential for encountering potentially contaminated soils and construction debris. There would also be increased risk of traffic accidents due to COVs remaining onsite at RHC LPOE during construction.</p> <p><b>Operations:</b> Same impacts as Alternative 1.</p> <p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p><b>Construction:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At the RHC LPOE, adverse impacts to human health and safety from hazardous materials and waste handling would be similar, but Alternative 3 would require the demolition and removal of approximately 13 buildings and structures east of Customs Avenue with potential presence of asbestos and lead paint throughout the interior of the buildings due to their age. Also, the presence of hazardous materials, waste tires, automotive waste, and other waste materials in buildings on the site would create safety issues and require their proper disposal and management. There would also be increased risk of traffic</p>	<p>Negligible impacts from ongoing maintenance, resulting in use of hazardous materials and generation of hazardous waste. COV processing would not be relocated and hazardous materials would continue to be transported through downtown Douglas.</p>

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<p><b>Alternatives 1a – 1d:</b> Potential impacts on human health and safety considered under Alternative 1 analysis would be short-term, minor, and adverse during construction, and long-term, minor, and beneficial during operations.</p>		<p>accidents due to COVs remaining onsite at RHC LPOE during construction.  <b>Operations:</b> Same impacts as Alternative 1.  <b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	

**Impact Reduction Measures:**

- If PCB-containing materials are identified onsite, appropriate abatement actions would be implemented in accordance with regulatory requirements. If present in underlying soils, appropriate abatement actions would be implemented in accordance with applicable regulatory requirements.
- All spills or releases of POLs; hazardous materials; pollutants; or contaminants would be handled in accordance with measures outlined in a Spill Prevention and Response Plan prepared for construction.
- As a BMP, a Soil Management Plan may be prepared to address the potential for encountering areas of environmental concern during subsurface disturbance.
- All personnel would follow standard operating procedures for hazardous waste and material handling, and all waste would be disposed of in accordance with applicable federal, state, and local regulations.
- A USEPA Identification Number would be obtained if more than 100 pounds of hazardous waste is generated under any alternative.
- If Alternative 3 is selected, GSA would consider the need to conduct further investigations within the Alternative 3 Expansion Area related to VOCs associated groundwater contamination underlying the parcel.
- If Alternative 3 is selected, GSA would consider the need to conduct a GPR and Electro Magnetic survey within the Alternative 3 Expansion Area to further identify for the presence of any USTs at the site prior to construction.
- Construction workers would adhere to safety standards promulgated in 29 CFR Chapter 17 to protect against workplace hazards. To minimize potential exposure or safety concerns to workers, appropriate personal protective equipment would be worn.

ACHP = Advisory Council on Historic Preservation; BMP = best management practice; CGP = Construction General Permit; COV = commercially owned vehicle; dBA = A-weighted decibel; GSA = General Services Administration; GHG = greenhouse gas; LEED = Leadership in Energy and Environmental Design; LPOE = land port of entry; NEPA = National Environmental Policy Act; NHPA = National Historic Preservation Act; PCB = polychlorinated biphenyl; PM = particulate matter; POV = personally owned vehicle; RHC = Raul Hector Castro; SHPO = State Historic Preservation Officer; SR-80 = State Route 80; US-191 = U.S. Highway 191; VOC = volatile organic compound; WCM = water conservation measure

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## ACRONYMS

<b>Acronym</b>	<b>Definition</b>
ACHP	Advisory Council on Historic Preservation
ACM	asbestos-containing material
ADEQ	Arizona Department of Environmental Quality
ADOT	Arizona Department of Transportation
ADWR	Arizona Department of Water Resources
AMA	Active Management Area
APE	Area of Potential Effect
APS	Arizona Public Service Company
A.R.S.	Arizona Revised Statutes
ATSDR	Agency for Toxic Substances and Disease Registry
AZPDES	Arizona Pollutant Discharge Elimination System
BGEPA	Bald and Golden Eagle Protection Act
BLM	Bureau of Land Management
BMP	best management practice
CAA	Clean Air Act
CBP	Customs and Border Protection
CEQ	Council on Environmental Quality
CGP	Construction General Permit
CFR	Code of Federal Regulations
CH <sub>4</sub>	methane
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> -eq	carbon dioxide equivalent
COV	commercially owned vehicle
CWA	Clean Water Act
dB	decibels
dBA	A-weighted decibel
DEIS	Draft Environmental Impact Statement
EIS	Environmental Impact Statement
EISA	Energy Independence and Security Act
EO	Executive Order
EJSCREEN	Environmental Justice Screen
ESA	Endangered Species Act
FAMU	family unit
FEMA	Federal Emergency Management Agency
FMCSA	Federal Motor Carrier Safety Administration
GHG	greenhouse gas
GPR	ground penetrating radar
GSA	General Services Administration
GWP	global warming potential
I-10	Interstate 10

<b>Acronym</b>	<b>Definition</b>
IPaC	Information, Planning, and Consultation System
INA	Irrigation Non-Expansion Area
LBP	lead-based paint
LEED	Leadership in Energy and Environmental Design
LOS	level of service
LPOE	Land Port of Entry
LUST	leaking underground storage tank
MCDOT	Maricopa County Department of Transportation
mg/kg	milligrams per kilogram
MGP	manufactured gas plant
MOU	Memorandum of Understanding
MSWL	Municipal Solid Waste Landfill
MS4	Municipal Separate Storm Sewer System
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
N <sub>2</sub> O	nitrous oxide
NOI	Notice of Intent
Non-MSWL	Non-Municipal Solid Waste Landfill
NO <sub>x</sub>	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NSPS	New Source Performance Standards
O <sub>3</sub>	ozone
OSHA	Occupational Health and Safety Act
PAH	polycyclic aromatic hydrocarbon
PCB	polychlorinated biphenyl
PM	particulate matter
PM <sub>2.5</sub>	particulate matter 2.5 micrometers or smaller
PM <sub>10</sub>	particulate matter 10 micrometers or smaller
POL	petroleum, oils, or lubricants
POV	privately owned vehicle
PPM	parts per millions
PSD	Prevention of Significant Deterioration
RCRA	Resource Conservation and Recovery Act
RHC LPOE	Raul Hector Castro Land Port of Entry
ROI	region of influence
ROW	right-of-way
SC-GHG	social cost of GHG
SHPO	State Historic Preservation Officer
SO <sub>2</sub>	sulfur dioxide
SITES	Sustainable Sites Initiative
SR-80	State Route 80

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<b>Acronym</b>	<b>Definition</b>
SRL	Soil Remediation Levels
SWMP	stormwater management plan
SVOC	semi-volatile organic compound
SWPPP	Stormwater Pollution Prevention Plan
TPH	total petroleum hydrocarbons
UAC	unaccompanied juvenile
U.S.	United States
USC	United States Code
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UST	underground storage tank
V/C	volume-to-capacity
VOC	volatile organic compound
VRP	Voluntary Remediation Program
WOTUS	Waters of the U.S.
WWTP	Wastewater Treatment Plant

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## CHAPTER 1 PURPOSE OF AND NEED FOR THE PROJECT

The General Services Administration (GSA) has prepared this Environmental Impact Statement (EIS) for the purpose of analyzing the potential environmental impacts resulting from the Proposed Action to expand and modernize the Raul Hector Castro (RHC) Land Port of Entry (LPOE) and construct a new commercial LPOE in Douglas, Arizona. GSA has prepared this EIS in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321 *et seq.*), the Council on Environmental Quality (CEQ) regulations implementing National Environmental Policy Act (NEPA) (40 Code of Federal Regulations [CFR] 1500-1508), GSA Order ADM 1095.1F (Environmental Consideration in Decision Making), the GSA Public Building Service's *NEPA Desk Guide*, and other relevant federal and state laws and regulations. This EIS discloses the environmental impacts that would result from the Proposed Action and alternatives.

### 1.1 INTRODUCTION

GSA's mission includes the custody and control of federal buildings, including United States (U.S.) LPOEs. As part of this mission, GSA designs, constructs, manages, maintains, and retains custody and control of 122 of the 167 U.S. LPOEs, including the RHC LPOE. The RHC LPOE is a port of entry for vehicles and pedestrians crossing the U.S.-Mexico border, between Douglas, Arizona and Agua Prieta, Sonora in Mexico. The port is operated by the U.S. Department of Homeland Security's Customs and Border Protection (CBP), and is a full-service, multi-modal facility where CBP officers inspect commercially owned vehicles (COVs), privately owned vehicles (POVs), and pedestrians.

The RHC LPOE has operated since 1914, with existing facilities constructed in the 1930s. Historically, the regional economy was driven by the local mining industry in nearby Bisbee, Arizona (approximately 27 miles to the west of the City of Douglas), which employed both U.S. and Mexican citizens. The City of Douglas was founded as a smelter town to treat copper ore, with major copper smelters beginning operations in 1902, owned and operated by the Phelps Dodge Corporation.

While there is no longer an active smelting operation in the City of Douglas, and mining operations in Bisbee have been substantially reduced, heavy mining machinery is still regularly transported across the border to facilitate mining operations in Mexico.

In recent years, Agua Prieta has experienced growth in several economic sectors. It is home to the first integrated solar combined cycle power plant in Mexico and several large manufacturing operations. Agricultural trade is also an economic driver in the region. Generally, the shipment of goods and equipment from Agua Prieta to Douglas and beyond has a substantial economic impact on the region and the movement of trucks carrying oversized equipment and materials through the port is common. With respect to pedestrian traffic, a large portion of pedestrians from Mexico are shoppers taking advantage of the duty-free goods available at the shops just north of the RHC LPOE.

Due to steady increases in traffic, poor pedestrian infrastructure, lack of separations between traffic types (COV, POV, and pedestrian), and undersized facilities at the end of their functional lives, the facilities at the RHC LPOE no longer function adequately and pose safety and security risks for CBP officers and the general public (GSA 2019a). These issues include the following:

- Traffic volumes for all modalities at the RHC LPOE have seen a steady increase in recent years and are expected to continue rising (GSA 2018).
- Currently, all vehicular traffic crossing through the RHC LPOE must cross through the existing communities of Douglas and Agua Prieta. These high volumes create congestion and put a large demand on the existing road infrastructure in the cities, which were not constructed for heavy traffic. Additionally, the movement of oversized equipment and mining tools through the port requires specialized coordination to cross the border, often further backing up commercial and non-

commercial traffic. The City of Douglas has also expressed concerns with hazardous materials utilized in the mining industry being transported across the border in commercial trucks and passing through the urban core of their community.

- The commingling of commercial, non-commercial, and pedestrian traffic moving through the port also creates a safety and security risk for CBP officers and the general public. COV, POV, and pedestrian traffic moving through the port is highly intertwined. The current configuration requires pedestrians to cross both incoming and outgoing vehicle traffic at various points throughout the port, including areas without proper traffic signals. The current configuration of the RHC LPOE creates a burden on CBP officers as it requires them to dedicate a disproportionate amount of their time monitoring traffic flows around the port to ensure pedestrian safety.
- The influx of family units (FAMUs) and unaccompanied juveniles (UACs) have also put a strain on the port facilities. These large groups require special care, such as timely and convenient access to showers, food, and medical care. A large area of the CBP staff's space is now utilized for family holding, which does not contain the necessary segmentation for officer and detainees or proper processing, detention, or storage space. In order to properly process and supervise these groups, the RHC LPOE needs additional space in a segregated facility to ensure the safety and care of the detainees.

The RHC LPOE is located on approximately 6 acres with facilities owned and managed by GSA and operated by CBP. The existing port has limited opportunity for expansion within its current footprint. The existing facilities have limited interior space for offices and processing, and port operations are being negatively affected due to the lack of space. As a temporary solution, a standalone modular unit was recently constructed in the existing parking lot behind the historic Main Building.

To address these varied concerns, GSA is proposing to expand and modernize the existing RHC LPOE and construct a new Commercial LPOE to the west of the existing facilities. The proposed Commercial LPOE is proposed on land that is currently owned by the City of Douglas. In 2000, the city purchased land in this area as part of larger plans with Cochise County to develop the area and facilitate the development of a new LPOE, so to move commercial traffic away from downtown Douglas and revitalize the area be a more pedestrian-oriented community (City of Douglas et al. 2021). There are other ongoing planning efforts to redevelop this area that are outside the scope of GSA's control and not a part of the Proposed Action.

### **1.1.1 Description of the RHC LPOE and Proposed Commercial Port Area**

The City of Douglas is the main urban border community encompassing the project area; it is located in southeastern Arizona, approximately 120 miles southeast of Tucson, in Cochise County. Douglas has a population of approximately 16,500. Agua Prieta, Sonora, Mexico is located south of the border, adjacent to the City of Douglas. It has a population of approximately 100,000 people. See Figure 1-1 for a regional figure of the project area.

The RHC LPOE is located at the intersection of 1<sup>st</sup> Street and Pan American Avenue (see Figure 1-2). 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), located approximately 63 miles northwest of Douglas. Adjacent land under consideration for acquisition 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 1<sup>st</sup> Street.

The planned site for the proposed Commercial LPOE is approximately 5 miles west of the existing RHC LPOE located off James Ranch Road (see Figure 1-1). The site is primarily undeveloped; the only major infrastructure consists of a U.S. Border Patrol Station built in 2003 at the intersection of SR-80 and Kings Highway.



Figure 1-1. Regional Location of the RHC LPOE and Proposed Commercial LPOE



Figure 1-2. Approximate Property Boundary of the RHC LPOE

The existing RHC LPOE facilities consist of POV inspection processing facilities on the western side, pedestrian processing facilities through the center of the site, and commercial processing facilities on the eastern side (see Figure 1-3). The current facility includes seven lanes for POVs, one lane for COVs, and three stations for processing pedestrians (see Figure 1-4). Pedestrian processing activities occur in the central area of the port, mainly at the historic Main Building. The non-commercial vehicles processing facilities are located immediately west of the historic Main Building. Other non-commercial vehicular facilities include the Headhouse and Secondary Inspection facilities located directly north of the POV inspection lanes. The commercial portion of the port comprises an office building, two primary inspection booths, a storage warehouse, a secure storage facility, canine kennels, and a canopy structure over the booths and docks.

Pedestrian access from the south requires crossing traffic lanes where vehicles queue to enter the primary inspection area of the RHC LPOE. Once across traffic, pedestrians enter into an outdoor mall/queuing area and proceed to the historic Main Building pedestrian inspection area. Incoming commercial and non-commercial vehicle traffic queues along the border on the Mexico side, moving east to west on Calle Internacional, the street along the southern border in Mexico. The northernmost lane is dedicated to commercial traffic only.

Additional facilities within the RHC LPOE include a parking lot and the historic Garage, which is located just north of the historic Main Building and is used for office and storage space. A Federal Motor Carrier Safety Administration (FMCSA) facility is located to the northeast of the main processing areas but is not a part of the RHC LPOE. The City of Douglas donated a small parking lot across from the FMCSA facility for CBP to use.

The historic Main Building and Garage were built in 1933 and are listed on the National Register of Historic Places (NRHP). Due to the historic designation, any renovation work to the original 1933 buildings would require compliance with the National Historic Preservation Act (NHPA) of 1966 and the U.S. Secretary of the Interior's *Standards for Rehabilitation*. See Figure 1-5 for a representative photo of the Main Building.

## 1.2 PURPOSE OF AND NEED FOR THE PROPOSED ACTION

The purpose of this 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.

In order to bring the RHC LPOE operations in line with CBP's design standards and operational requirements, the project is needed to:

- 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 existing RHC LPOE must remain operational in order to allow CBP to continue to meet its mission requirements. The existing footprint of the RHC LPOE must expand to allow for GSA to meet the above needs. After evaluating project design options and considering economic and market factors, GSA concluded that expansion areas must be contiguous to the existing RHC LPOE to provide for a cohesive, efficient final site plan.

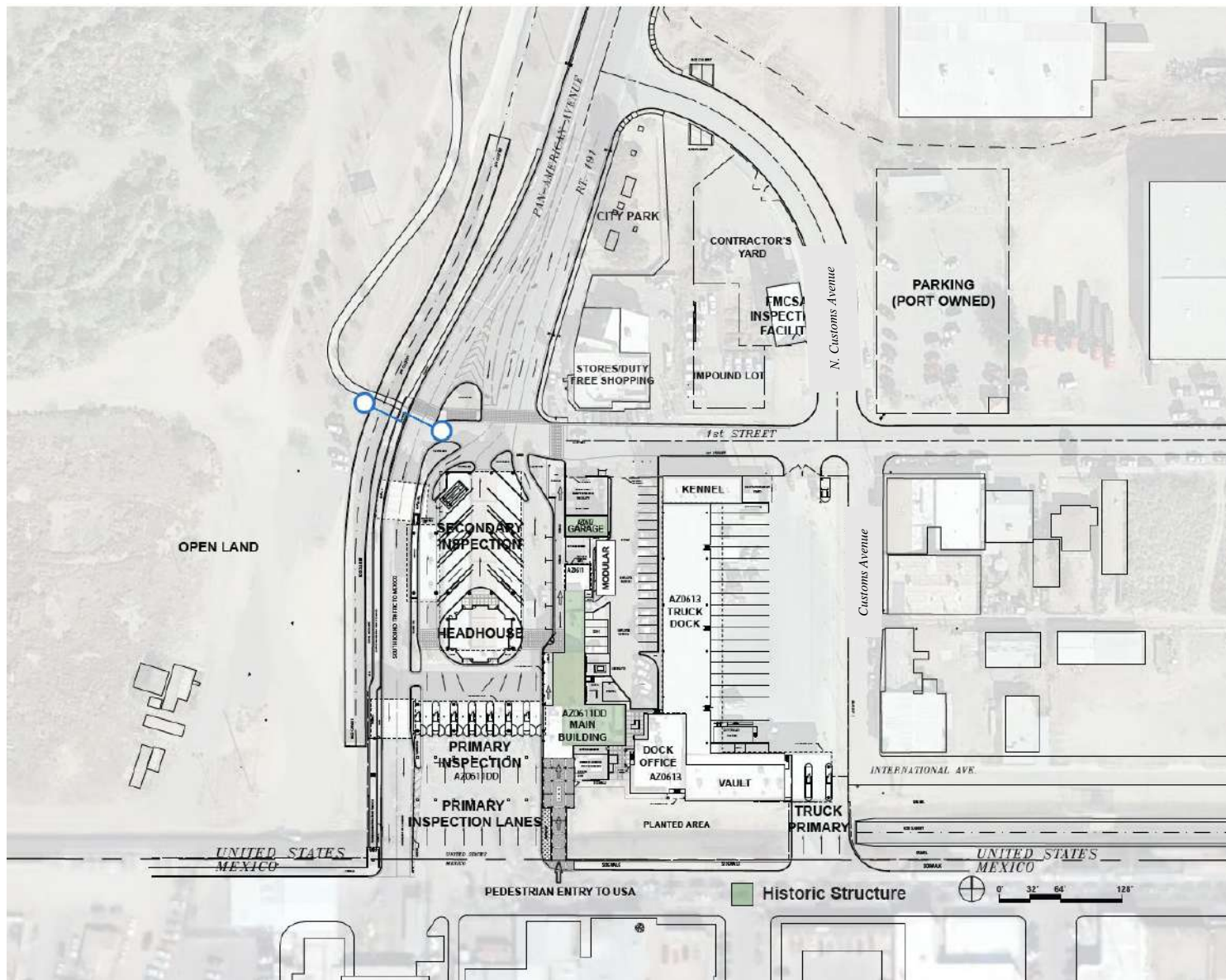


Figure 1-3. Existing Site Layout of the RHC LPOE

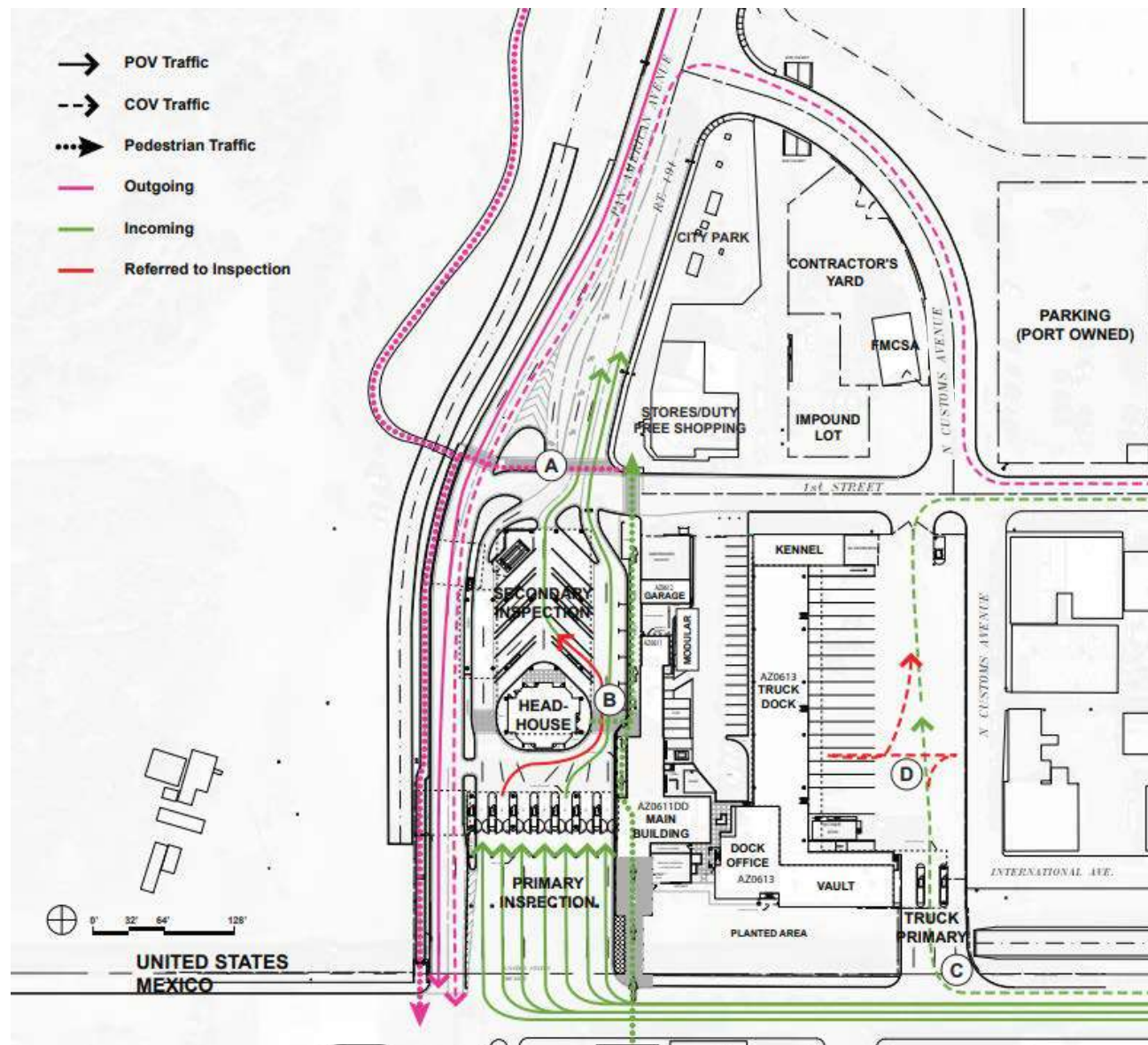


Figure 1-4. Existing Traffic Flow at RHC LPOE



**Figure 1-5. Historic Main Building – Facade**

### **1.3 PUBLIC INVOLVEMENT AND AGENCY COORDINATION**

The NEPA process provides several opportunities for public involvement. During these times, interested and affected parties (i.e., stakeholders) may express their concerns and provide their views about:

- The project and its possible impacts on the natural and human environment;
- What should be addressed in the analysis and evaluation of the Proposed Action; and
- The adequacy of the NEPA analysis and documentation of potential impacts in the EIS.

Public participation with respect to decision-making on the Proposed Action is guided by GSA’s implementing procedures for compliance with NEPA (GSA Order ADM 1095.1F, *Environmental Considerations in Decision Making*).

#### **1.3.1 Scoping Phase**

##### **1.3.1.1 Notification of Public Scoping**

A Notice of Intent (NOI) for the EIS was published in the *Federal Register* on July 14, 2022. GSA also published advertisements in English and Spanish in the weeks preceding the public scoping meeting. The advertisements were published in the *Herald Review* on July 20, August 3, and August 7, 2022. Announcements were posted on GSA’s social media accounts on July 28, 2022. The City of Douglas also posted announcements of the meeting on the city’s social media accounts on July 27 and 28 and August 4, 5, and 10, 2022. Additionally, GSA mailed scoping letters dated July 14, 2022 to federal, state, and local agencies; elected officials; and other interested parties.

GSA’s advertisements, announcements, and letters indicated the agency’s intent to prepare an EIS and conduct a scoping meeting; provided a brief description of the project; identified the public scoping meeting time and location; and included instructions on submitting a comment. GSA accepted comments through August 22, 2022.



### 1.3.1.2 Public Scoping Meeting

A public meeting was held on Thursday, August 11, 2022 from 4:00 p.m. to 6:00 p.m. at the Douglas Visitor Center located at 345 16<sup>th</sup> Street, Douglas, Arizona, 85607. Approximately 42 people attended the meeting. An open house format was used to encourage discussion and information sharing and to ensure that the public had opportunities to speak with representatives of GSA. Informational posters about the proposed alternatives, project background, purpose and need, and ways for submitting scoping comments were provided at the meeting. Additional materials available at the public scoping meeting included a sign-in sheet, a comment form, and a handout. Representatives from the City of Douglas were available to provide translation services as needed to the public.

### 1.3.1.3 Summary of Public Scoping Comments

GSA invited written comments to be submitted via mail or email on this EIS. More specifically, GSA invited comments on the key topics that should be covered in the EIS; examples of potential adverse and beneficial impacts from the Proposed Action; and any other relevant information. Comments were submitted using comment forms and emails.

A total of 22 unique commenters provided input during the scoping period. Comments were provided on a range of topics as shown in Table 1-1, with the majority of comments received concerning potential truck traffic routes and the former Phelps Dodge smelter site located approximately 0.7 mile west of the RHC LPOE. GSA received a total of 46 comments.

**Table 1-1. Commenters and Comments by Category**

Category	Number of Commenters	Number of Comments
Purpose and Need	1	1
Public Scoping Process	1	4
Proposed Action	4	4
Alternatives	1	2
Cultural Resources	1	2
Air Quality and Greenhouse Gas Emissions	1	6
Water Resources	2	2
Biological Resources	2	4
Transportation and Traffic	7	7
Socioeconomics	1	1
Environmental Justice	1	3
Human Health and Safety	8	9
Cumulative Impacts	1	1

A Scoping Report was prepared for this EIS and includes a more detailed description of comments as well as meeting materials from the Public Scoping Meeting (see Appendix A).

## 1.3.2 Draft EIS Phase

### 1.3.2.1 Notification of a Draft EIS Public Meeting

A Notice of Availability for the Draft EIS (DEIS) was published in the *Federal Register* on January 27, 2023. GSA also published advertisements in English and Spanish in the weeks preceding the public

meeting. The advertisements were published in the *Herald Review* on February 1, 15, and 19, 2023. Announcements were posted on GSA's social media accounts on February 14 and 22, 2023. The City of Douglas also posted announcements of the meeting on the city's social media accounts on February 15 and 17, 2023 and on the city's government website on February 21, 2023. Additionally, GSA mailed letters to federal, state and local agencies; elected officials; and other interested parties.

GSA's advertisements, announcements, and letters indicated the availability of the DEIS and intent to conduct a public meeting; identified the public meeting time and location; and included instructions on submitting a comment. GSA accepted comments through March 13, 2023. Comments received during the 45-day comment period have been considered and are addressed in this document (see Appendix E).

### **1.3.2.2 Draft DEIS Public Meeting**

A public meeting was held on Wednesday, February 22, 2023 from 4:00 p.m. to 6:00 p.m. at the Douglas Visitor Center located at 345 16<sup>th</sup> Street, Douglas, Arizona, 85607. Approximately 55 people attended the meeting. The public meeting was conducted in an open house format, similar to the scoping meeting as described in Section 1.3.1.2. Informational posters about the proposed alternatives, project background, purpose and need, impacts anticipated from the project alternatives, and ways for submitting comments were provided at the meeting. Additional materials available at the public meeting included a sign-in sheet, a comment form, and a handout. Representatives from the City of Douglas were available to provide translation services as needed to the public.

### **1.3.2.3 Notification of a Revised DEIS Public Meeting**

Since publication of the DEIS on January 27, 2023, GSA has identified an additional viable alternative for consideration as described in Chapter 2. Therefore, GSA is re-issuing this DEIS for public review.

GSA is soliciting comments from interested persons and stakeholders on this revised DEIS during a 45-day comment period. Similar to the original DEIS, the public was notified of the revised DEIS public meeting through publication of a Notice of Availability in the *Federal Register*, as well as multiple other channels of communication, including newspaper ads, letters to interested parties, social media posts, and website postings. Comments received during the 45-day comment period will be considered in preparation of the Final EIS and will be made part of the Administrative Record.

### **1.3.2.4 Revised DEIS Public Meeting**

GSA invites public comment on the revised DEIS during an in-person public meeting to be held during the revised DEIS public comment period. Similar to the original DEIS, the meeting will be an open-house format where presentation boards will be provided and the public will have an opportunity to interface with GSA representatives, as well as have the opportunity to provide comments on the revised DEIS. Representatives from the City of Douglas will be available to provide translation services as needed to the public. Information on attending the public meeting can be found at the following website:

- **Proposed Commercial LPOE** – <https://www.gsa.gov/about-us/regions/welcome-to-the-pacific-rim-region-9/land-ports-of-entry/douglas-commercial-land-port-of-entry>
- **RHC LPOE** – <https://www.gsa.gov/about-us/regions/welcome-to-the-pacific-rim-region-9/land-ports-of-entry/raul-hector-castro-land-port-of-entry>

### **1.3.3 Agency Consultation**

GSA has identified historic properties that could be adversely affected by the proposed project. The Section 106 process is currently underway to determine effects to these historic properties under the NHPA. An update on the status of the Section 106 process will be included in the Final EIS. Interested parties are invited to participate in the Section 106 process by contacting Natalie Loukianoff at [natalie.loukianoff@gsa.gov](mailto:natalie.loukianoff@gsa.gov) or 628-224-5682. See Section 3.2, Cultural Resources for additional information on the NHPA and Section 106 process.

GSA has identified potential suitable dispersal habitat for a federally protected species approximately 100 feet north of the project area. Per Section 7 consultation to determine effects to federally protected species under the Endangered Species Act (ESA), GSA sent a technical assistance letter to the U.S. Fish and Wildlife Service (USFWS) Arizona Ecological Services Field Office dated November 22, 2022 and USFWS provided a response letter on December 16, 2022. In their response letter, USFWS provided comments on GSA's effect determinations under Section 7 of the ESA. GSA considered USFWS's comments in this revised Draft EIS and requested concurrence on their effect determination in September 2023, which includes concurrence of effect determination on Alternative 3 (Concurrent Construction - Eastward Expansion). See Section 3.7, Biological Resources, for additional information on the ESA and the Section 7 process. Results of GSA's informal consultation will be included in the Final EIS.

Consultation letters with the agencies are included in Appendix B.

#### **1.3.4 Tribal Consultation**

GSA is seeking tribal input to help inform the analysis of the project. Affiliated tribes were sent letters in January 2023, initiating government to government consultation and requesting input on the project (see Appendix B).

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## CHAPTER 2 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

GSA proposes to construct a new Commercial LPOE approximately 5 miles west of the existing RHC LPOE, and expand and modernize the existing RHC LPOE to address various operational, capacity, and safety issues associated with the existing LPOE. The Proposed Action is defined as the construction of a new Commercial LPOE and expansion and modernization of the existing RHC LPOE.

Three action alternatives are being considered. Alternative 1 would include construction of a new Commercial LPOE first, followed by a phased expansion and modernization of the existing RHC LPOE after the Commercial LPOE is operational. Alternative 1 would involve expanding the LPOE on land to the north and northeast. Alternative 2 would include construction of a new Commercial LPOE and phased expansion and modernization of the existing RHC LPOE at the same time, with the RHC LPOE expanding primarily to the west of the existing LPOE. Alternative 3 would also include construction of a new Commercial LPOE and phased expansion and modernization of the existing RHC LPOE at the same time, but with the RHC LPOE expanding primarily to the east of the existing LPOE. Both Alternatives 2 and 3 would also include the acquisition of land in the Alternative 1 Expansion Area to the north and northeast. GSA has already entered into preliminary discussions and agreements with their Mexican counterparts on siting the proposed Commercial LPOE and it is anticipated that the new facility would align with new Mexican facilities in Agua Prieta.

All alternatives would require the acquisition of land near the RHC LPOE and phased construction (2.7 acres for the Alternative 1 Expansion Area, 13.9 acres for the Alternative 2 Expansion Area, and 4.4 acres for the Alternative 3 Expansion Area); Alternatives 2 and 3 would require greater land acquisition so as to allow for expansion and modernization activities to occur while the existing port remains operational. Figure 2-1 illustrates the potential expansion area included for each alternative. GSA would negotiate with private landowners as applicable during the land acquisition process to provide fair compensation.

**Table 2-1. Land Area Requirements for Alternatives (acres)**

Area Included	No Action	Alternative 1	Alternative 2	Alternative 3
Existing RHC LPOE (including parking)	6.1	6.1	6.1	6.1
Alternative 1 Expansion Area	-	2.7	2.7	2.7
Alternative 2 Expansion Area	-	-	13.9	-
Alternative 3 Expansion Area	-	-	-	4.4
<b>Total New RHC LPOE</b>	<b>6.1</b>	<b>8.8</b>	<b>22.7</b>	<b>13.2</b>
New Commercial LPOE		80.5	80.5	80.5
<b>Total</b>	<b>6.1</b>	<b>89.3</b>	<b>103.2</b>	<b>93.7</b>

Under the No Action Alternative, GSA would not move forward with either alternative, as described in Section 2.4. The No Action Alternative serves as a baseline scenario for which potential environmental consequences can be compared in this EIS.

### 2.1 ALTERNATIVE 1 – SEQUENTIAL CONSTRUCTION

Under Alternative 1, GSA proposes a two-port solution that would separate the processing of commercial and non-commercial traffic to alleviate the inadequacies of the existing RHC LPOE. This alternative would consist of two main components, which are described in greater detail below in Sections 2.1.1 and 2.1.2:

- 1) **Construction of a new Commercial LPOE** – A new, dedicated LPOE would be constructed to process only COVs. The first stage of this alternative would be to construct a new Commercial LPOE at a site located approximately 5 miles west of the RHC LPOE; and

- 2) **Expansion and Modernization of the Existing RHC LPOE to a Non-Commercial LPOE** – After construction of the proposed Commercial LPOE is complete, the existing RHC LPOE would be expanded and modernized. The expanded and modernized facility would be dedicated to processing only POVs and pedestrians.

All new and modernization construction would seek to achieve Leadership in Energy and Environmental Design (LEED) certification at the highest feasible level within reasonable cost, with Gold-level standards at a minimum. The new and modernized facilities would be “net zero ready.” Renewable energy sources would be planned for future installation and provided with minimum infrastructure to accommodate the energy source (e.g., photovoltaics), if GSA decides to install such infrastructure. The new facilities would also comply with the Energy Independence and Security Act (EISA) of 2007. Between EISA 2007 and LEED, the project would adhere to whichever requirements are higher. Furthermore, the project would also adhere to the CEQ’s *Guiding Principles for Sustainable Federal Buildings*. The design team would utilize GSA’s Guiding Principles Checklist to track and report compliance.

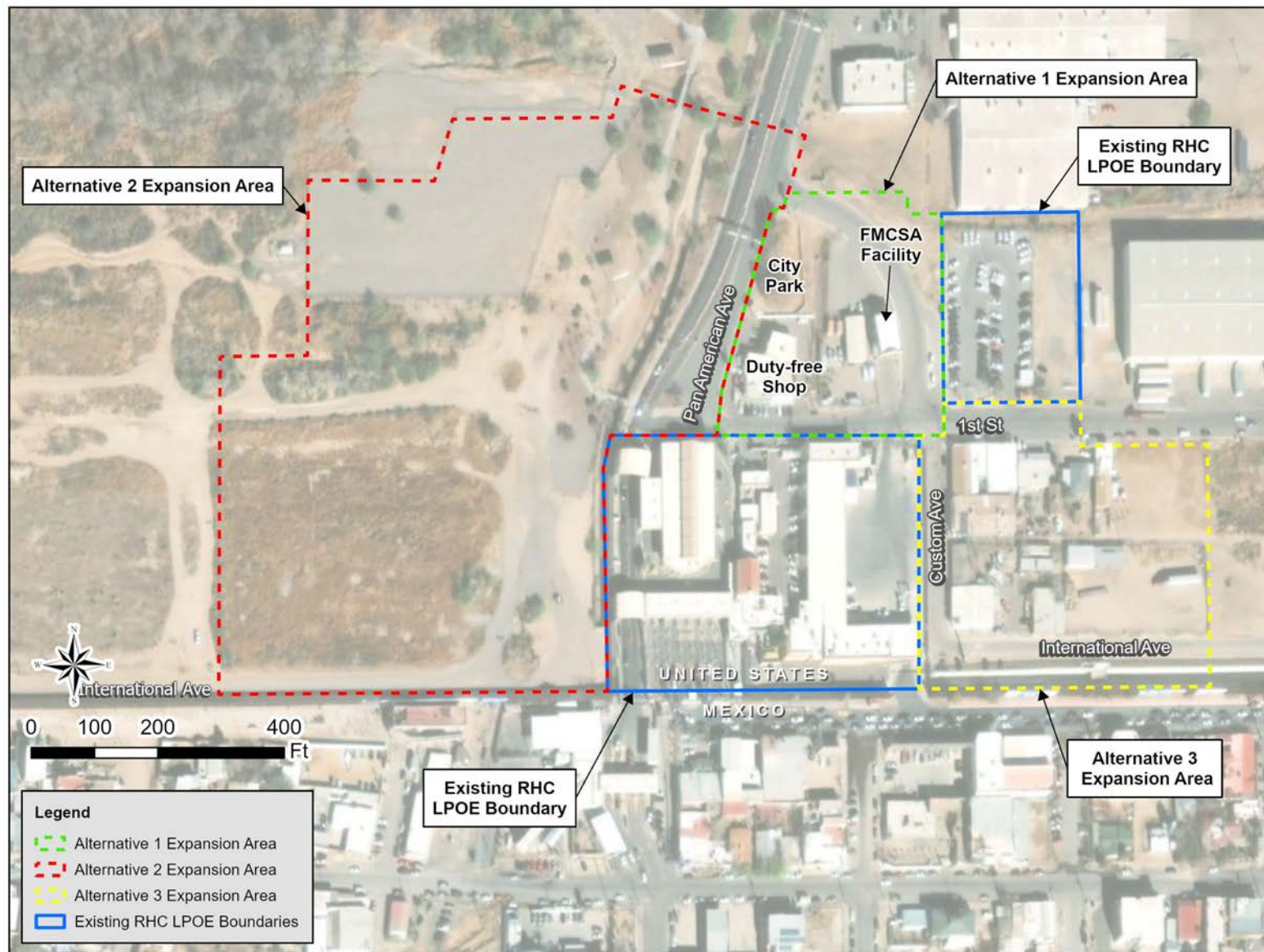


Figure 2-1. Expansion Areas for Alternatives 1, 2, and 3

### 2.1.1 Proposed Commercial LPOE

The proposed Commercial LPOE site is approximately 80.5 acres and is located south of the current terminus of James Ranch Road, accessed via SR-80 (see Figure 2-2). The only major infrastructure in the area consists of a U.S. Border Patrol Station at the intersection of SR-80 and Kings Highway. The land is currently owned by the City of Douglas; however, the land would be transferred to GSA prior to the implementation of Alternative 1.

The following siting criteria were considered when evaluating a proposed location for the proposed Commercial LPOE:

- **Proximity to roadways** – The proximity to major highways and transportation routes were considered for the accommodation of truck transport.
- **Availability of space** – The amount of square footage of a site was evaluated against the CBP requirements to process COVs.
- **Proximity to sensitive receptors** – Land use of adjacent properties were considered to evaluate potential land use conflicts and impacts to sensitive receptors.
- **Existing environmental constraints** – Natural environmental features, such as wetlands and floodplains, were considered to evaluate potential development issues.
- **Coordination with local governments** – Efforts to site the Commercial LPOE were coordinated with and supported by the City of Douglas and Cochise County.
- **Bi-national coordination** – Efforts to evaluate best siting locations were also coordinated with Mexico to ensure alignment of feasible sites and project schedules.

Figure 2-3 provides a conceptual site layout of the proposed Commercial LPOE. This site layout is a theoretical representation used for discussion and environmental analysis and represents the 50 percent design site plan for development of the Commercial LPOE. The exact layout of the Commercial LPOE would be determined by the construction contractor but would be similar in scope to what is described in the EIS. All new construction would obtain at a minimum LEED Gold certification. The main facilities of the Commercial LPOE would consist of the following:

- Main Building
- Commercial Vehicle Inspection (three lanes and bypass lane)
- Commercial Inspection/Staging
- Commercial Inspection Building
- Outbound Inspection
- Outbound Support Building
- Kennel
- Indoor Firing Range
- Vault
- FMCSA Facility
- Firearms Simulator Building
- Emergency Power

A new right-of-way grant would be required from the Bureau of Land Management (BLM) for the road between the Commercial LPOE and the U.S. – Mexico border, which would be located on BLM-managed land in T. 24 S., R. 26 E., sec. 24. GSA would ensure coordination with the BLM Tucson Field Office, which is the federal land manager.

GSA does not propose any direct change in the alignment of James Ranch Road for the proposed Commercial LPOE as part of its Proposed Action. However, under a separate project not affiliated with GSA's Proposed Action, James Ranch Road would be improved (i.e., widened and resurfaced) and extended to the project area by the Arizona Department of Transportation (ADOT). This project is being planned by ADOT to support regional future planning efforts and would also support the proposed Commercial LPOE. Any associated change in the right-of-way for James Ranch Road would require coordination by ADOT with BLM.





Figure 2-2. Site Location for the Proposed Commercial LPOE

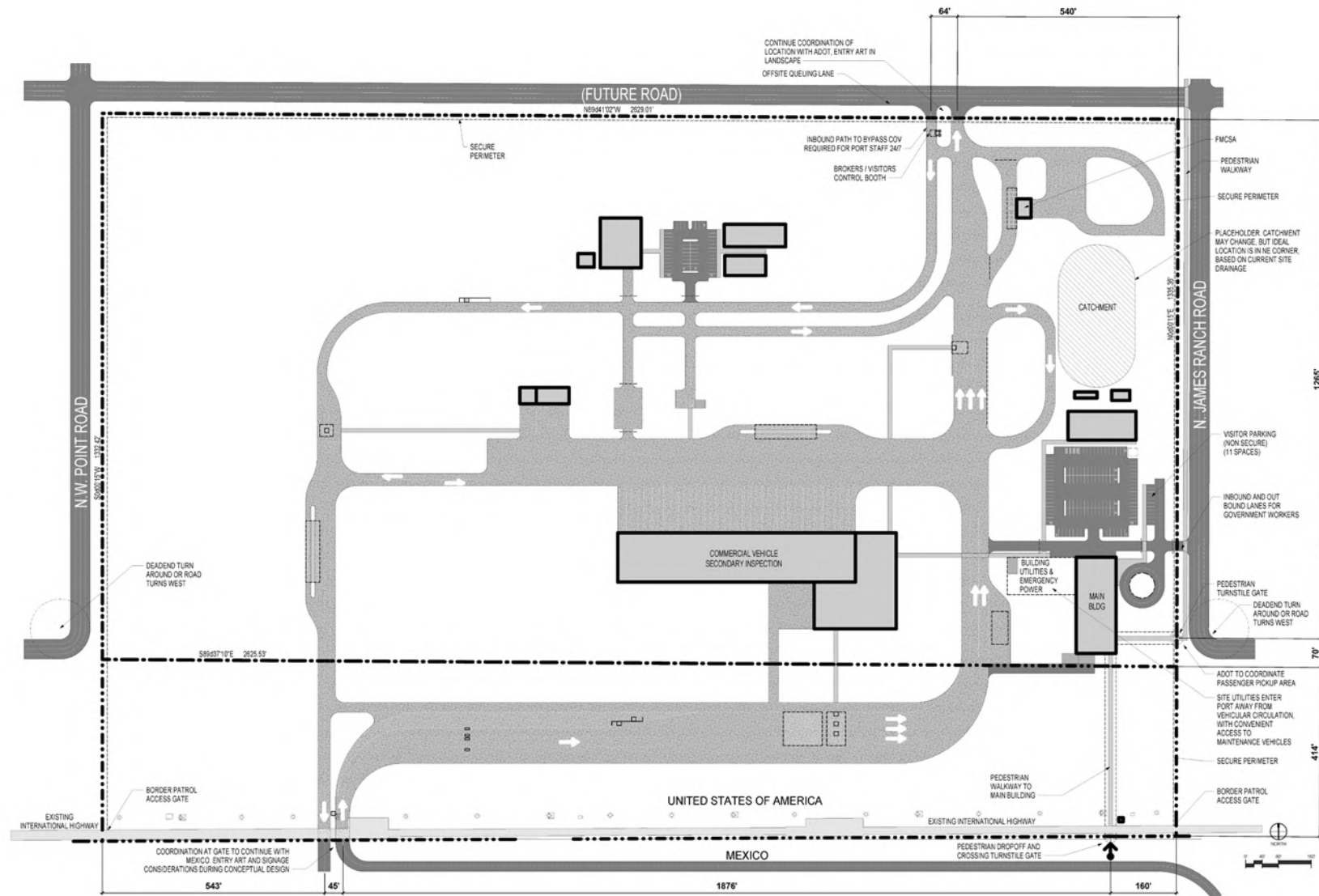


Figure 2-3. Conceptual Site Layout of the Proposed Commercial LPOE

The extension of James Ranch Road is anticipated to provide existing right-of-way (ROW) for utility connections to the proposed Commercial LPOE. Currently, there are no established electric, sewer, or water utility systems in the project area. Electricity would be connected to the project area via the state's public utility, Arizona Public Service Company (APS), to a nearby power source along James Ranch Road. It is expected that electricity lines would be placed along James Ranch Road within the ROW as part of ADOT's road widening action. For water and wastewater utilities, GSA may tie into existing service lines via the James Ranch Road ROW, pending establishment of water and wastewater utility connections in the surrounding area. The extension of these utilities to the project area would be part of larger development planning efforts in the region by a consortium of partners (including Cochise County, the City of Douglas, etc.) that are not a part of GSA's action. The City of Douglas and Cochise County are in the planning stages for the construction of water, wastewater, and broadband infrastructure to support utility needs of the proposed Commercial LPOE, as well as for other potential users included in the planning area (Stantec 2022). The proposed infrastructure would ultimately be owned by the City of Douglas (refer to Chapter 4 for a discussion of cumulative impacts from the infrastructure utility connection project, as well as other development near the proposed Commercial LPOE).

ADOT's Mexican counterpart – Secretary of Infrastructure and Urban Development – is transferring land immediately adjacent the border at the proposed Commercial LPOE site, plus the easement from the border to Mexican Highway 2 to build the necessary inspection infrastructure and connector roads on the Mexican side of the proposed Commercial LPOE (City of Douglas 2018). GSA understands potential project risks if Mexico's plans change or are terminated; however, this scenario is considered highly unlikely. In such a scenario, GSA would revisit internal planning efforts, to include compliance with all applicable environmental laws and regulations.

Construction of the proposed Commercial LPOE is estimated to begin in 2025, with substantial completion anticipated in 2028. Construction would be expected to take place over an approximate 48- to 54-month period and construction activities would occur within hours that are in accordance with local noise ordinances. Peak construction (up to 2 years) would require a potential maximum of 100 construction workers and 150 trucks per day for deliveries and waste removal. During non-peak construction, approximately 50 workers would be onsite. All construction and demolition waste would be disposed and recycled at authorized facilities. Anticipated operating hours for the proposed Commercial LPOE would be from 6:00 a.m. to 10:00 p.m. It is expected CBP would hire approximately 100 positions to support the proposed Commercial LPOE.

Separating out commercial from non-commercial traffic would eliminate the commingling of trucks with pedestrians and POVs and, therefore, would improve congestion and the safety to workers and the public. Additionally, relocating truck routes away from the City of Douglas would minimize traffic congestion and hazards in the community.

### **2.1.2 Expansion and Modernization of the RHC LPOE into a Non-Commercial LPOE**

Expansion and modernization of the existing RHC LPOE would begin after the proposed Commercial LPOE is complete. Following expansion and modernization, the existing RHC LPOE would be dedicated to processing only non-commercial vehicles (cars, vans, and buses) and pedestrians. Alternative 1 at the existing RHC LPOE would include construction of the following facilities:

- A new Main Building, to include 6 pedestrian inspection booths
- Non-Commercial Vehicle Inspection, to include 10 primary inspection lanes and 24 secondary inspection bays
- Headhouse
- FMCSA Bus Inspection Facilities
- Parking
- 3 Outbound Non-Commercial Vehicle Inspections
- Outbound Support Building
- Public-Facing/Trusted Traveler Enrollment Center
- Family/UAC Processing Building – includes an outdoor area
- Emergency Power

To the extent practicable, Alternative 1 would be implemented using a phased construction approach to alleviate potential disruptions at the existing RHC LPOE. The exact construction phasing sequence and layout of the LPOE would be determined by the construction contractor. Generally, after construction of the proposed Commercial LPOE is complete, all commercial operations at the existing RHC LPOE would be transferred to the new facility, including an impound lot directly north of the RHC LPOE and the FMCSA facility. In the Alternative 1 Expansion Area, two parcels to the north of the existing RHC LPOE, one park owned by the City of Douglas, and another privately owned with commercial facilities, would be acquired and vacated (refer to Figures 1-3 and 2-1). The Alternative 1 Expansion Area would also include the vacant lands on either side of the port-owned parking lot north of 1<sup>st</sup> Street and east of Customs Avenue. Existing RHC LPOE facilities, stores, the city park, and FMCSA facility would be demolished, and new facilities would be constructed, similar to as shown in the conceptual layout illustrated in Figure 2-4 (refer to Section 2.1.2.1 for a discussion of management of historic structures). It is assumed that the duty-free shopping would relocate to another nearby location. The conceptual layout of the expanded RHC LPOE would also require the permanent closure of Customs Avenue between Pan American Avenue and 1<sup>st</sup> Street as indicated in Figure 2-4.

Similar to the Commercial LPOE, the site layout for the modernized existing LPOE is a theoretical representation used for discussion and environmental analysis. The exact layout of the LPOE would be determined by the construction contractor but would be similar in scope to what is described in the EIS. Following the transfer of all commercial activities to the proposed Commercial LPOE, all existing non-commercial operations, including the processing of POVs and pedestrians, would be transferred to the new non-commercial facilities. It is expected CBP would hire approximately 50 positions to support the expanded and modernized RHC LPOE.

Construction at the RHC LPOE is estimated to begin in 2028, with substantial completion anticipated in 2031. Construction would be expected to take place over an approximate 36- to 42-month period and demolition and construction activities would occur within hours that are in accordance with local noise ordinances. Peak construction (up to 2 years) would require a potential maximum of 100 construction workers and 150 trucks per day for deliveries and waste removal. During non-peak construction, approximately 50 workers would be onsite. All construction and demolition waste would be handled in accordance with federal, state, and local regulations and disposed or recycled at authorized facilities.

As portions of the project area fall within a floodplain, standard protocols for flood mitigation and stormwater management would be incorporated into the final design to mitigate against impacts from flooding. Measures may include minimizing the location of new facilities within the floodplain to the extent practicable, designing appropriate stormwater management structures, or raising buildings to an elevation above the floodplain.

A traffic study was conducted in July 2018 (Stantec 2018) as part of the port redesign planning process. One goal of port redesign to reduce traffic volumes is to maintain an average waiting time of approximately 30 minutes during peak times. Table 2-2 provides wait times for inbound and outbound traffic, based on a 2018 baseline scenario. Based on vehicle wait times assessed in the study, under the Proposed Action, vehicle wait times would be reduced up to 22 minutes and 35 seconds, for POV vehicles entering the U.S. Other average and maximum vehicle wait times would be expected to see commensurate wait time reductions. Notably, COV inbound traffic wait times (currently 42 minutes and 49 seconds) are expected to improve substantially with establishment of a new Commercial LPOE.

**Table 2-2. Vehicle Wait Times at the RHC LPOE, 2018 Baseline Scenario**

	POV	COV
<b>INBOUND (Entry to U.S.)</b>		
Average Wait Time (before primary inspection) (min:sec)	34:12	26:27
Maximum Wait Time (before primary inspection) (min:sec)	52:35	42:49
<b>OUTBOUND (Entry to Mexico)</b>		
Average Wait Time (before primary inspection) (min:sec)	01:19	19:41
Maximum Wait Time (before primary inspection) (min:sec)	01:25	21:47

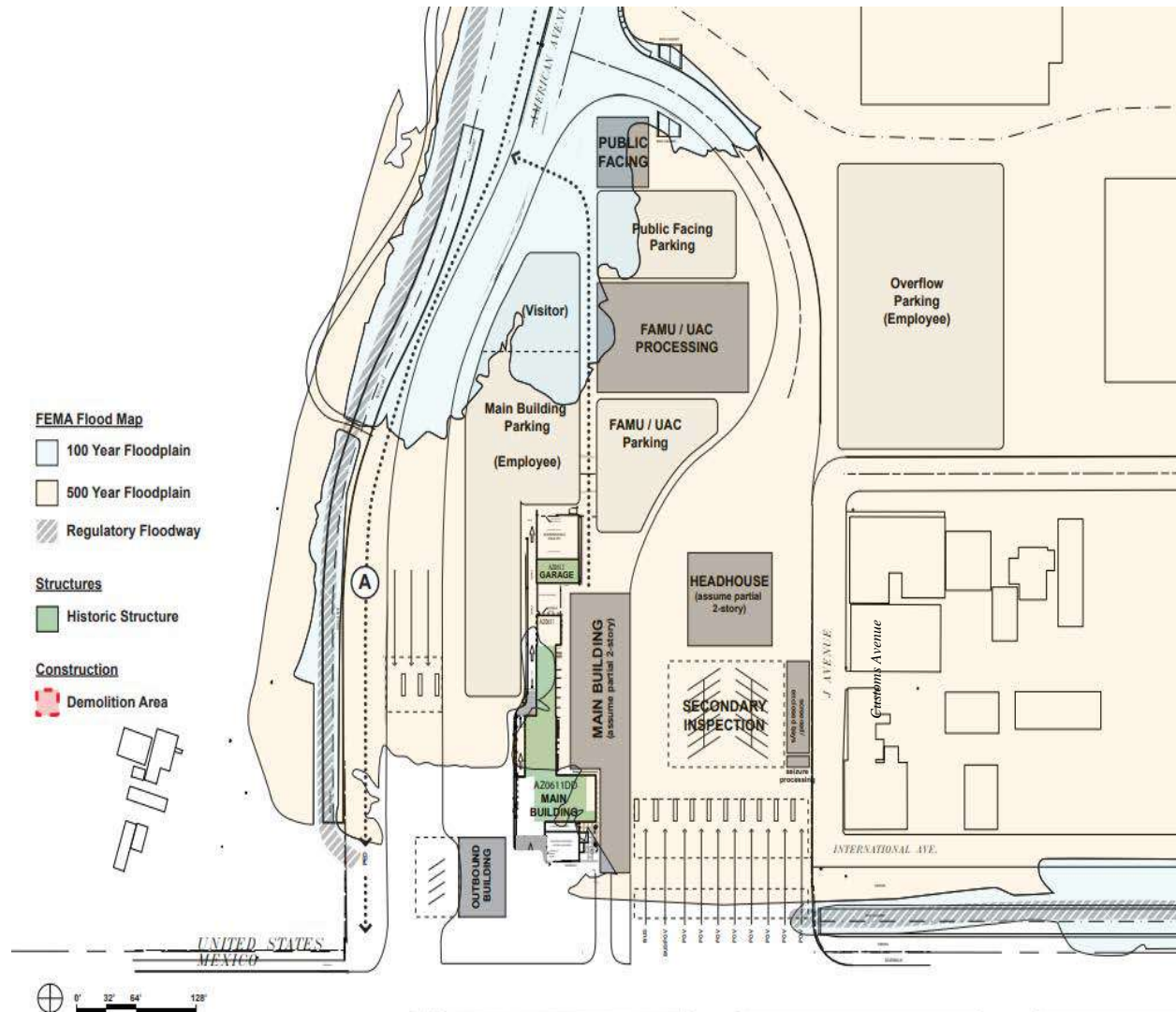
COV = commercially owned vehicle; min = minutes; POV = privately owned vehicle; sec = seconds  
 Source: Stantec 2018

**2.1.2.1 Alternatives 1a – 1d: Reuse, Relocate, or Demolish Historic Structures**

As discussed in Section 1.1.3, the existing historic Main Building and Garage are listed on the NRHP. Due to the designation, any modifications or potential demolition associated with the historic Main Building and Garage would be required to follow GSA *Procedures for Historic Properties*. Any changes to the buildings would also follow the Secretary of the Interior’s *Standards for the Treatment of Historic Properties* and applicable guidelines.

GSA proposes the following sub-alternatives with respect to the historic Main Building and Garage, described below. Under these sub-alternatives, GSA would proceed with the remainder of Alternative 1 as described in Section 2.1.2, but would manage the historic structures through one of the following means, pending the outcome of ongoing Section 106 consultation with the State Historic Preservation Officer (SHPO) and consulting parties.

- **Alternative 1a: Adaptive Reuse of Historic Structures** – Under this sub-alternative, the historic Main Building and Garage would be carefully integrated into the modernization plans of the RHC LPOE and repurposed into a more current and useful structure. Any remodeling or renovation work would be done in a manner that preserves the cultural and historic significance of these structures.



**Figure 2-4. Conceptual Diagram for a Final Phase During Expansion and Modernization of RHC LPOE**

Note: This conceptual diagram is derived from the Feasibility Study (GSA 2019a) prepared for this project and does not include the FCMSA Bus Inspection Facility, which was added as the Program of Requirements for the LPOE was assessed.

- **Alternative 1b: Relocation of Historic Structures** – Under this sub-alternative, the historic Main Building and Garage would be relocated to another location. Relocating these structures would most likely require lifting the whole structure intact and transporting it to a new location. Careful planning would be required to help facilitate transport of the whole structure and site preparation for both the old and new locations.
- **Alternative 1c: Demolition of Historic Structures** – Under this sub-alternative, the historic Main Building and Garage would be demolished during the modernization of the RHC LPOE. GSA would consult the SHPO and additional consulting parties to develop an agreement document and appropriate mitigation measures, such as documentation of the structures prior to demolition.
- **Alternative 1d: Combination of Alternative 1a through 1c** – Under this sub-alternative, some combination of adaptive reuse, relocation, or demolition would be selected for the historic Main Building and Garage.

## 2.2 ALTERNATIVE 2 – CONCURRENT CONSTRUCTION (WESTWARD EXPANSION)

To expedite construction for the purpose of achieving cost and time efficiencies, GSA proposes to construct the commercial and non-commercial facilities concurrently. Under Alternative 2, the RHC LPOE would continue to operate as usual, while construction activities for the proposed Commercial LPOE and for the expansion and modernization of the RHC LPOE would occur at the same time, similar to as described in Section 2.1.1 and Section 2.1.2, respectively. As under Alternative 1, a multi-phase construction plan would be implemented to ensure minimal disruption to the port's daily operations as well as safety to employees and the public.

Because the existing RHC LPOE has limited opportunity for expansion within its current footprint, Alternative 2 includes acquisition of additional adjacent land parcels to facilitate concurrent construction, primarily west of the existing RHC LPOE. Under Alternative 2, GSA may acquire some or all of the land shown as the Alternative 2 Expansion Area in Figure 2-1. GSA may also consider acquiring temporary easements from the city for construction laydown areas for portions of this expansion area. Following construction, land may be returned to the city or previous owner. Final plans for land acquisition would be determined during the design process for the RHC LPOE. The area proposed for acquisition is primarily undeveloped land owned by a combination of other federal landowners, the City of Douglas, and private owners; and also includes roadways owned by the City of Douglas or State of Arizona. Alternative 2 would also include the parcels directly north and northeast of the existing RHC LPOE that GSA proposes to acquire under Alternative 1 (i.e., the Alternative 1 Expansion Area).

The newly acquired land would be utilized for staging and / or phased construction of new facilities for the RHC LPOE, similar to as discussed in Section 2.1.2. Similarly, final phasing and configuration of the facilities, including traffic flow, would be determined by the construction contractor but would remain within the footprint as depicted in Figure 2-1 and would be similar to as described for Alternative 1. The increased expansion area under the concurrent alternative could allow for larger, more expanded level of operations at the RHC LPOE. As new facilities become operational, old facilities may be demolished or repurposed, as necessary. Future growth or development not considered in this analysis would be considered under future, separate NEPA analysis, where the public would have an opportunity to provide public comments and weigh in on the planning process at that time.

Under Alternative 2, construction of the proposed Commercial LPOE and at the RHC LPOE is estimated to begin in 2025, with substantial completion anticipated in 2028. Construction would be expected to take place over an approximate 48- to 54-month period and construction activities would occur within hours that are in accordance with local noise ordinances. Peak construction (up to 2 years) would require a potential maximum of 100 construction workers and 150 trucks per day, per site, for deliveries and waste removal (i.e., 200 construction workers and 300 trucks per day, at both the existing RHC LPOE and Commercial

LPOE sites). During non-peak construction, approximately 50 workers would be onsite at each project location (i.e., 100 construction workers at both sites). All construction and demolition waste would be handled in accordance with federal, state, and local regulations and disposed or recycled at authorized facilities.

### **2.2.1 Alternatives 2a – 2d: Reuse, Relocate, or Demolish Historic Structures**

Management of the historic Main Building and Garage would be handled as described in Section 2.1.2 under the following sub-alternatives:

- **Alternative 2a** – Adaptive Reuse of Historic Structures
- **Alternative 2b** – Relocation of Historic Structures
- **Alternative 2c** – Demolition of Historic Structures
- **Alternative 2d** – Combination of Alternatives 2a through 2c

## **2.3 ALTERNATIVE 3 – CONCURRENT CONSTRUCTION (EASTWARD EXPANSION)**

Alternative 3 would be comparable to Alternative 2 except that the expansion would occur primarily to the east of the existing RHC LPOE. To expedite construction for the purpose of achieving cost and time efficiencies, GSA proposes to construct the commercial and non-commercial facilities concurrently. Under Alternative 3, the RHC LPOE would continue to operate as usual, while construction activities for the proposed Commercial LPOE and for the expansion and modernization of the RHC LPOE would occur at the same time as described in Section 2.1.1 and Section 2.1.2, respectively. As under Alternative 1 and 2, a multi-phase construction plan would be implemented to ensure minimal disruption to the port's daily operations as well as safety to employees and the public.

Because of the limited opportunities for expansion at the existing RHC LPOE, Alternative 3 includes acquisition of additional adjacent land parcels to facilitate concurrent construction, but primarily east of the existing LPOE. Under Alternative 3, GSA may acquire some or all of the land shown as the Alternative 3 Expansion Area in Figure 2-1. Final plans for land acquisition would be determined during the design process for the RHC LPOE. The area proposed for acquisition primarily consists of developed commercial and residential parcels with private landowners, and also includes roadways owned by the City of Douglas or State of Arizona. Alternative 3 would also include the parcels directly north and northeast of the existing RHC LPOE that GSA proposes to acquire under Alternative 1 (i.e., the Alternative 1 Expansion Area).

The newly acquired land would be utilized for staging and/or phased construction of new facilities for the RHC LPOE, as discussed in Section 2.1.2. Similarly, final phasing and configuration of the facilities, including traffic flow, would be determined by the construction contractor but would remain within the footprint as depicted in Figure 2-1 and would be similar to Alternative 1.

Construction of the proposed Commercial LPOE and at the RHC LPOE under Alternative 3 would occur during a similar time frame, would be subject to the same requirements, and would require a similar amount of construction workers and vehicles as described for Alternative 2.

### **2.3.1 Alternatives 3a – 3d: Reuse, Relocate, or Demolish Historic Structures**

Management of the historic Main Building and Garage would be handled as described in Section 2.1.2 under the following sub-alternatives:

- **Alternative 3a** – Adaptive Reuse of Historic Structures
- **Alternative 3b** – Relocation of Historic Structures
- **Alternative 3c** – Demolition of Historic Structures
- **Alternative 3d** – Combination of Alternatives 3a through 3c



## 2.4 No Action Alternative

The No Action Alternative is included and analyzed to provide a baseline for comparison with impacts from the Proposed Action and also to satisfy federal requirements for analyzing “no action” under NEPA (40 CFR 1502.14(d)).

Under the No Action Alternative, there would be no construction of a new Commercial LPOE, and expansion and modernization of the RHC LPOE would not occur. Any type of modification to the existing port would be limited to minor repairs and maintenance, as needed. The operation of the RHC LPOE would generally remain as it currently does, but the capacity and efficiency of the port would likely degrade over time due to increased traffic demand as discussed in Chapter 1. Additionally, concerns with the commingling of COV, POV, and pedestrian traffic would remain. The City of Douglas would continue experiencing a steady stream of truck traffic, some of which would continue to haul hazardous materials. In general, this alternative would not meet the Purpose and Need for the Proposed Action, as identified in Chapter 1.

## 2.5 ALTERNATIVES CONSIDERED AND DISMISSED FROM DETAILED ANALYSIS

### 2.5.1 Modernization of RHC LPOE Only

A Modernization-Only Alternative for the RHC LPOE was also considered as a potential alternative during the project design process. This alternative would include modernization activities within the current RHC LPOE footprint only. The Modernization-Only Alternative was evaluated against the following factors:

- **Spatial constraints** – The existing footprint of the RHC LPOE is limited in size. The Modernization-Only Alternative would greatly limit options to improve capacity and functionality of the LPOE. Without expansion, increasing traffic demand would result in continued deficiencies in operational efficiency and safety. CBP staff would continue with inadequate space for operations, especially from the influx of FAMUs and UACs. Additionally, the existing Agua Prieta customs facilities directly across the RHC LPOE are restricted by infrastructure on all four sides and may not be able to accommodate expansion, thereby limiting potential relief from the increasing traffic demand.
- **Commingling of traffic** – The existing COV, POV, and pedestrian traffic is highly commingled at the RHC LPOE, causing safety and congestion issues for the workers and the general public. Although traffic flow could be improved under the Modernization-Only Alternative, the COV traffic would not be separated out and vehicle and pedestrian traffic would still intersect, resulting in traffic hazards similar to current conditions.
- **Truck routing** – Heavy trucks transporting equipment, supplies, and hazardous material travel through the downtown area and pose safety concerns for the City of Douglas. Under the Modernization-Only Alternative, COV processing would remain at the RHC LPOE and, therefore, truck travel through the city would also remain, maintaining the same safety concerns as current conditions.

Based on these factors, the Modernization-Only Alternative would not allow GSA to fully support CBP’s mission by bringing the RHC LPOE operations in line with current land port design standards and operational requirements. As a result, the Modernization-Only Alternative would not meet GSA’s Purpose and Need for the Proposed Action and, therefore, this alternative was not carried forward for further analysis in this EIS.

### 2.5.2 Alternative Locations for the Commercial LPOE

The following alternative locations for the proposed Commercial LPOE were considered but dismissed as they did not meet the purposed and need for the Proposed Action described in Section 1.2 or the siting criteria for the Commercial LPOE listed in Section 2.1.1:

- Two alternative locations for the proposed Commercial LPOE site were considered but dismissed during the project feasibility study development process. One proposed site was considered on Kings Highway adjacent to the U.S. Border Patrol Station. This location was considered but dismissed as it lacked consensus with local governments and bi-national coordination with the Mexican government. A second location was considered on the west side of Pan American Avenue, directly west of the existing RHC LPOE (near the current Alternative 2 Expansion Area). This location was considered but dismissed because it would not improve traffic congestion and safety for the City of Douglas, lacks sufficient space, and lacked bi-national consensus with the Mexican government and local government cooperation.
- During the scoping period, a commenter suggested GSA consider developing the Commercial LPOE to the east of the City of Douglas near the Douglas Municipal Airport. This location was considered but dismissed as it was determined to be significantly further from major highways and transportation routes, particularly the primary commercial transport route in the region, US-191. Development of a commercial LPOE in this area would require substantially greater road improvements by ADOT to connect the Commercial LPOE with SR-80 (at least approximately 3.5 miles of road improvements) compared to the location under consideration near James Ranch Road, which would require only approximately 1.5 miles of road improvements. This location also lacks bi-national consensus with the Mexican government and local government cooperation.
- The same commenter also suggested development of a third LPOE for mining and hazardous materials transport near Cattleman Road. This location was considered but dismissed as it would result in significant inefficiencies for commercial inspection and processing by splitting mining and hazardous material transport from other commercial traffic, which would not meet the Purpose and Need of the Proposed Action to improve functionality of the LPOEs. This option for a third LPOE also would result in significant cost increases and lacks bi-national consensus with the Mexican government and local governments.
- During the DEIS public review process, a commenter suggested locating the Commercial LPOE near the Brooks Road alignment. This location was considered but dismissed as it lacked consensus with local governments and bi-national coordination with the Mexican government.

Table 2-3 summarizes the adherence of each of these alternative locations against the siting criteria for the Commercial LPOE.

**Table 2-3. Alternative Locations Commercial LPOE Adherence to Siting Criteria**

Siting Criteria	Kings Highway	West of Pan American Ave	East of Douglas	Third LPOE on Cattleman Rd	Brooks Road
Proximity to roadways	x			x	x
Availability of space	x		x	x	x
Proximity to sensitive receptors	x		x	x	x
Existing environmental constraints	x	x	x	x	x
Coordination with local governments					
Bi-national coordination					

## 2.6 COMPARISON OF ALTERNATIVES

Table 2-4 compares the potential environmental impacts resulting from the alternatives. Potential impacts are summarized for each resource area affected by the alternatives. Chapter 3 of this EIS contains a detailed discussion of these potential impacts by resource area.

**Table 2-4. Summary Comparison of Alternatives**

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<b>Cultural Resources</b>			
<p><b>Construction:</b> For both LPOE sites, adverse effects under NHPA and direct, significant adverse impacts could occur under NEPA to cultural resources if unanticipated discoveries are encountered during ground-disturbing activities. Ground-disturbing activities would occur within undeveloped, vacant 80.5 acres at proposed Commercial LPOE and highly developed 2.7-acre expansion area for RHC LPOE. Implementation of archaeological monitoring plan and impact reduction measures would mitigate any potential adverse effects and reduce impacts to less-than-significant levels. Regarding architectural properties, GSA recommended 2 buildings located in the RHC LPOE Alternative 1 Expansion Area as not eligible for inclusion in NRHP; SHPO concurred with GSA's finding on one of two buildings. GSA is continuing seeking concurrence with SHPO on GSA's findings based on a revised cultural study. Refer to Alternatives 1a – 1d for discussion of adverse effects to historic Main Building and Garage.</p> <p><b>Operations:</b> No adverse effects under NHPA and no significant impacts to cultural resources during the operational phase would be expected.</p> <p><b>Alternatives 1a – 1d:</b> Alternative 1a – no adverse effects under NHPA and direct, negligible, adverse impacts under NEPA. Alternative 1b – adverse effects under NHPA and direct, significant, adverse, and permanent impacts under NEPA. Alternative 1c – direct adverse effects under NHPA and direct, significant, adverse, and permanent impacts under NEPA. Alternative 1d – direct</p>	<p><b>Construction:</b> At proposed Commercial LPOE and existing RHC LPOE (including Alternative 1 Expansion Area), similar impacts as Alternative 1. At Alternative 2 Expansion Area, ground-disturbing activities would occur within an additional 13.9 acres of mainly undeveloped but previously disturbed land. Implementation of archaeological monitoring plan and impact reduction measures would mitigate any potential adverse effects and reduce impacts to less-than-significant levels. Regarding architectural properties, similar impacts as discussed under Alternative 1; additionally, GSA recommended another building located in the RHC LPOE Alternative 2 Expansion Area as not eligible for inclusion in NRHP; SHPO concurred with GSA's finding for this building.</p> <p><b>Operations:</b> Similar to Alternative 1, no adverse effects under NHPA and no impacts to cultural resources during the operational phase would be expected.</p> <p><b>Alternatives 2a – 2d:</b> Potential impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p><b>Construction:</b> At proposed Commercial LPOE and existing RHC LPOE (including Alternative 1 Expansion Area), similar impacts as Alternative 1. At RHC LPOE Alternative 3 Expansion Area, ground-disturbing activities would occur within an additional 4.4 acres of previously disturbed land containing 13 buildings, plus graded and/or paved lots. Implementation of archaeological monitoring plan and impact reduction measures would mitigate any potential adverse effects and reduce impacts to less-than-significant levels. Regarding architectural properties, similar impacts as discussed under Alternative 1; additionally, GSA is recommending another six buildings located in the RHC LPOE Alternative 3 Expansion Area as not eligible for inclusion in NRHP and is seeking concurrence with SHPO on GSA's findings based on a revised cultural study.</p> <p><b>Operations:</b> Similar to Alternative 1, no adverse effects under NHPA and no impacts to cultural resources during the operational phase would be expected.</p> <p><b>Alternatives 3a – 3d:</b> Potential impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p>No adverse effects to historic properties and no adverse impacts to cultural resources would be expected.</p>

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<p>adverse effects under NHPA and direct, minor to significant, adverse, and permanent impacts under NEPA. For Alternatives 1b, 1c and 1d, GSA would be required to develop measures to avoid, minimize, or mitigate adverse effects on these historic properties, which would result in less-than-significant impacts under NEPA and would resolve effects under NHPA.</p>			
<p><b>Impact Reduction Measures:</b> Prior to construction, GSA would implement the following measures:</p> <ul style="list-style-type: none"> <li>• Develop an archaeological monitoring plan in consultation with SHPO, ACHP, federally recognized Indian tribes, and other consulting parties to reduce impacts from ground-disturbing activities.</li> <li>• Identify and develop appropriate mitigation measures to avoid, minimize or mitigate adverse effects on historic properties in consultation with SHPO and other applicable consulting parties. At a minimum, Historic American Buildings Survey documentation for the historic Main Building and Garage would be considered. Additional mitigation could include architectural artifact salvage. Appropriate mitigation would be determined in consultation between GSA, SHPO, and consulting parties.</li> </ul>			
<p><b>Air Quality and Greenhouse Gas Emissions</b></p>			
<p><b>Construction:</b> For both LPOE sites, short-term, minor adverse impacts on regional air quality due to dust and emissions from construction equipment and vehicles; emissions would not exceed <i>de minimis</i> thresholds for any criteria pollutants. Negligible increases in GHGs.</p> <p><b>Operation:</b> For both sites, long-term, minor adverse impact on air quality due to emissions from onsite equipment and increased commuter vehicles; long-term, minor beneficial impact to air quality from reduced POV wait times; long-term, minor indirect adverse air quality impact due to increased POVs from increased efficiency of the RHC LPOE. Long-term, minor adverse impacts to GHGs from onsite equipment and increased commuter traffic; however, adverse impacts offset by modernized, more sustainable facilities. Negligible air quality impacts at Commercial LPOE from operation of firing range.</p>	<p><b>Construction:</b> Potential impacts similar to Alternative 1 but would occur over a shorter period and be greater in intensity. Impacts would be short-term, minor and adverse; emissions would not exceed <i>de minimis</i> thresholds for any criteria pollutants. Negligible increases in GHGs.</p> <p><b>Operations:</b> Potential impacts would be same as Alternative 1.</p> <p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p><b>Construction:</b> Potential impacts comparable to Alternative 2. Impacts would be short-term, minor and adverse; emissions would not exceed <i>de minimis</i> thresholds for any criteria pollutants. Negligible increases in GHGs.</p> <p><b>Operations:</b> Potential impacts would be same as Alternative 1.</p> <p><b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p>Short-term, minor adverse impacts from ongoing maintenance at RHC LPOE. Long-term, minor adverse impacts due to degradation of capacity and efficiency of operations, resulting in longer wait times and congestion at the RHC LPOE and greater POV emissions.</p>

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<p><b>Alternatives 1a – 1d:</b> Potential impacts already considered under Alternative 1 analysis. Compared to Alternatives 1a and 1b, impacts under Alternatives 1c and 1d would be greater due to demolition activities and additional trucks hauling debris.</p>			
<p><b>Impact Reduction Measures:</b> The following measures would be implemented during construction:</p> <ul style="list-style-type: none"> <li>• Precautions to prevent PM from becoming airborne, such as using water on dirt roads or clearing land.</li> <li>• Additional measures to control fugitive dust, such as installing wind fencing and operating water trucks for stabilization of surfaces under windy conditions.</li> <li>• Source-specific controls to minimize emissions during construction activities, such as reducing unnecessary idling from heavy-duty equipment.</li> <li>• Administrative controls, such as preparing an inventory of all equipment prior to construction and identifying the suitability of add-on emission controls for each piece of equipment before groundbreaking.</li> </ul> <p>To minimize impacts of climate change on human health and safety, implementation of climate change adaptation measures in the project design phase, such as, incorporating shaded areas wherever possible.</p> <p>To minimize impacts of climate change on energy resources, implementation of climate change adaptation measures in the project design phase, such as implementing measures to maximize energy efficiency where possible.</p> <p>To minimize impacts of climate change on water resources, design with a minimum of LEED Gold certification for the proposed facilities, which would incorporate water conservation and efficiency measures.</p> <p>Refer to Section 3.3, Air Quality and Greenhouse Gas Emissions in the EIS for the full list of impact reduction measures that would be considered.</p>			
<p><b>Land Use and Visual Resources</b></p>			
<p><b>Construction:</b> For both LPOE sites, short-term, minor adverse impacts to adjacent land uses due to construction activities from dust, traffic, noise, road delays, and access limitation. At the RHC LPOE, long-term, moderate, adverse impacts for the businesses on 1<sup>st</sup> Street from permanent closure of Customs Avenue between Pan American Avenue and 1<sup>st</sup> Street requiring the relocation of traffic access and relocation of an existing bus stop. Long-term, minor adverse impacts from permanent loss of a city park. Temporary absence of a duty-free shop at the RHC LPOE. At proposed Commercial LPOE, short-term, moderate adverse impacts to visual resources; at the RHC LPOE, short-term, minor adverse impacts to visual resources.</p>	<p><b>Construction:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar impacts to land use and visual resources as Alternative 1, but to greater extent from larger additional expansion area.</p> <p><b>Operations:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar land use and visual impacts as Alternative 1, but to greater extent from larger additional expansion area, including loss of trails from Paseo de las Americas Linear Park (minor adverse impact) and conversion of land with illicit construction debris dumping (minor beneficial impact).</p>	<p><b>Construction:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar impacts to land use and visual resources as Alternative 1, but to greater extent from larger additional expansion area. Acquisition of 7 parcels zoned commercial would permanently displace at least one active business and 3 residential occupants, and eliminate ongoing storage uses by other commercial owners, which would cause long-term, direct, moderate adverse impacts.</p> <p><b>Operations:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar land use and visual impacts as Alternative 1, but to greater extent from larger additional expansion</p>	<p>Long-term minor to moderate adverse land use impacts from COV traffic remaining in city and conflicting with city's long-term revitalization plans. Long-term, minor adverse visual resources impacts from continuation of deterioration of facilities at RHC LPOE and</p>

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<p><b>Operations:</b> Permanent, moderate beneficial impacts to land use from aligning with long-term land use planning goals at both LPOE sites; long-term, moderate, beneficial, indirect impacts to land use at the RHC LPOE from potential future repurposing of existing warehouse district by the city. Permanent, minor to moderate adverse visual impacts from distinct visual change and from lighting at the proposed Commercial LPOE; permanent, minor beneficial visual impacts from newly constructed buildings at the RHC LPOE.</p> <p><b>Alternatives 1a – 1d:</b> Potential impacts already considered in analysis for RHC LPOE footprint. Long-term, negligible to moderate beneficial visual impact from potential remodeling or renovation work on the historic structures under Alternatives 1a and 1b.</p>	<p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p>area and permanent loss of commercial and residential uses on the expansion area.</p> <p><b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p>increasing traffic congestion.</p>
<p><b>Impact Reduction Measures:</b> Regarding land use, consideration of local zoning laws and all design requirements of state and local governments to the extent practicable, including both the incorporation of exterior design elements to reflect the unique character of the area and the emphasis on pedestrian circulation and amenities, to the extent practicable and consistent with GSA design standards.</p> <p>Regarding visual resources, implementing the following measures:</p> <ul style="list-style-type: none"> <li>• Consult with local officials, consider local requirements, and comply with building codes to the maximum extent practicable.</li> <li>• Integrate its programs of design/architecture and construction excellence into the new facility in order to optimize building performance and aesthetics.</li> <li>• Design exterior lighting to meet physical security requirements but controlled to minimize light trespass (e.g., direct light downward and minimize glare). Exterior lighting would be consistent with the local ordinance code for outdoor lighting to the extent possible.</li> <li>• Incorporate landscaping and screening into the exterior design consistent with GSA's Urban Development/Good Neighbor Program.</li> </ul> <p>Also refer to impact reduction measures under Air Quality and Greenhouse Gas Emissions; Transportation and Traffic, and Noise for measures to reduce construction impacts on land use-related concerns related to fugitive dust, traffic, and noise.</p>			
<p><b>Geology and Soils</b></p>			
<p><b>Construction:</b> For both LPOE sites, minor adverse impacts on geology and negligible adverse impacts on topography. At proposed Commercial LPOE, permanent, moderate adverse impacts to soils from disturbing 80.5 acres; at RHC LPOE, permanent, minor</p>	<p><b>Construction:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar impacts to geology and soils as Alternative 1, but to greater extent from larger expansion area (13.9 additional acres), resulting in permanent, minor to moderate adverse soil impacts.</p>	<p><b>Construction:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar impacts to geology and soils as Alternative 1, but to greater extent from larger expansion area (4.4 additional acres), resulting in permanent, minor to moderate adverse soil impacts.</p>	<p>No impacts to geology or topography would be expected. Negligible impacts to soils could occur due to land</p>

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<p>adverse impacts to soils from disturbing 8.8 acres.</p> <p><b>Operations:</b> No impacts to geology or topography. At proposed Commercial LPOE, long-term, minor, adverse, and indirect impacts to soils due to erosion. At the RHC LPOE, potential addition of up to 0.4 acres of impervious surfaces, resulting in long-term, negligible, adverse, and indirect impacts due to soil erosion.</p> <p><b>Alternatives 1a – 1d:</b> Potential impacts already considered in analysis for RHC LPOE footprint.</p>	<p><b>Operations:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar impacts to geology and soils as Alternative 1 (from up to 0.4 acres of additional impervious surface area). The larger expansion area would result in a potential increase of up to 13.9 acres of additional impervious surfaces, resulting in long-term, minor, adverse, and indirect impacts due to soil erosion.</p> <p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p><b>Operations:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar impacts to geology and soils as Alternative 1 (up to 0.4 acres of additional impervious surface area). The larger expansion area would result in a potential increase of up to 1.4 acres of additional impervious surfaces (not already developed, graded, or paved), resulting in long-term, minor, adverse, and indirect impacts from soil erosion.</p> <p><b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p>disturbance and soil erosion from ongoing maintenance activities.</p>
<p><b>Impact Reduction Measures:</b> Measures to reduce construction impacts on geology and soil-related concerns such as soil erosion, loss, and stability would be addressed in the design, grading and drainage plan, and the Arizona Stormwater CGP.</p>			
<p><b>Water Resources</b></p>			
<p><b>Construction:</b> At proposed Commercial LPOE, short-term, minor, direct adverse, and indirect impacts to surface waters and groundwater from sedimentation and contamination, and from groundwater use of a water well planned by the city.</p> <p>At RHC LPOE, short-term, minor, adverse, and indirect impacts to surface waters and groundwater from sedimentation and contamination, and from groundwater used during construction. Long-term, minor, adverse, direct and indirect impacts from construction within floodplains: 0.07 acre of 100-year floodplain inside RHC LPOE boundary; 4.98 acres of 500-year floodplain in RHC LPOE and separate LPOE parking area; and 2.04 acres of 500-year floodplain in Alternative 1 Expansion Area. See Appendix D.</p> <p><b>Operations:</b> At proposed Commercial LPOE, long-term, minor, adverse, and indirect</p>	<p><b>Construction:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar impacts to water resources as Alternative 1, but to greater extent from larger additional expansion area: short-term, minor, adverse, and indirect impacts from sedimentation and contamination, and construction near riverine feature (inside expansion area boundary); and long-term, minor, adverse, direct and indirect impacts from construction within floodplain. In addition to the acreages for Alternative 1, an increase of 0.63 acre of 100-year floodplain and 1.1 acres of 500-year floodplain are located in Alternative 2 Expansion Area. See Appendix D.</p> <p><b>Operations:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar water resources impact as Alternative 1, but to greater extent from</p>	<p><b>Construction:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar impacts to water resources as Alternative 1, but to greater extent from larger additional expansion area: short-term, minor, adverse, and indirect impacts from sedimentation and contamination, and construction near riverine feature (inside expansion area boundary); and long-term, minor, adverse, direct and indirect impacts from construction within floodplain. In addition to the acreages for Alternative 1, an increase of 0.46 acre of 100-year floodplain and 3.91 acres of 500-year floodplain are located in Alternative 3 Expansion Area. See Appendix D.</p> <p><b>Operations:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar water resources impact as Alternative 1, but to greater extent from</p>	<p>Long-term, negligible impacts to surface waters due to runoff during ongoing maintenance activities. No impacts to groundwater, floodplains, and wetlands.</p>

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<p>impacts to water resources due to increases in stormwater runoff, decreases in groundwater recharge, potential sedimentation or contamination, and from groundwater usage.</p> <p>Impacts would be similar at RHC LPOE, although it would be long-term, negligible to minor, and adverse.</p> <p><b>Alternatives 1a – 1d:</b> Potential impacts already considered under Alternative 1 analysis.</p>	<p>larger additional expansion area; long-term, minor, adverse, and indirect impacts to surface water from increase in runoff and downstream water quality degradation.</p> <p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p>larger additional expansion area; long-term, minor, adverse, and indirect impacts to surface water from increase in runoff and downstream water quality degradation.</p> <p><b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	
<p><b>Impact Reduction Measures:</b></p> <ul style="list-style-type: none"> <li>• Obtaining a minimum LEED Gold certification may include WCMs, such as low-flow fixtures and installing a retention system to control stormwater.</li> <li>• A minimum Sustainable Sites Initiative (SITES) silver rating is required for project design to manage stormwater and conserve water.</li> <li>• Compliance with impact reduction measures and BMPs as outlined in the Arizona Stormwater CGP and the Cochise County Stormwater Ordinance.</li> <li>• GSA would coordinate with USACE as applicable with respect to potential impacts to WOTUS, to include determining possible permitting requirements.</li> </ul>			
<p><b>Biological Resources</b></p>			
<p><b>Construction:</b> Proposed Action is unlikely to adversely affect any listed species. At proposed Commercial LPOE, permanent, moderate, adverse direct impacts to biological resources from ground disturbance, grading/clearing activities, and conversion of undeveloped land to new structures causing habitat fragmentation and displacement. Short-term, moderate, adverse, and indirect impacts from increased level of human activities. At RHC LPOE, short-term, minor, adverse and indirect impacts to biological resources from increased levels of human activities in a currently developed area.</p> <p><b>Operations:</b> At proposed Commercial LPOE, long-term, moderate, adverse, and indirect effects to species from noise, lighting, spread of non-native species, or accidental mortality of species. At RHC LPOE, long-term, negligible, beneficial, indirect impacts due to</p>	<p><b>Construction:</b> Proposed Action is unlikely to adversely affect any listed species. At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar adverse impacts to biological resources as Alternative 1, but to greater extent from larger additional expansion area – permanent, moderate, adverse, and direct impacts from ground disturbance and grading/clearing activities on undeveloped land (much of which has been disturbed previously). Indirect impacts would be greater than Alternative 1 due to concurrent construction – temporary, moderate, indirect adverse impacts regionally from increased levels of human activities.</p> <p><b>Operations:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, long-term, minor, adverse, and indirect impacts from increased human</p>	<p><b>Construction:</b> Proposed Action is unlikely to adversely affect any listed species. At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, similar adverse impacts to biological resources as Alternative 1 in an additional expansion area that has been mostly cleared/graded, paved, and/or developed with buildings and structures (i.e., permanent, minor, adverse, and direct impacts). Indirect impacts would be greater than Alternative 1 due to concurrent construction (i.e., temporary, moderate, indirect adverse impacts regionally from increased levels of human activities).</p> <p><b>Operations:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At RHC LPOE, long-term, negligible, adverse, and indirect impacts from increased human presence in previously disturbed and developed land east of the RHC LPOE.</p>	<p>Negligible, adverse, indirect impacts on biological resources due to ongoing maintenance activities.</p>



Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<p>removal of COVs and associated noise and traffic.</p> <p><b>Alternatives 1a – 1d:</b> Potential impacts already considered under Alternative 1 analysis.</p>	<p>presence in the previously disturbed but undeveloped land west of the RHC LPOE.</p> <p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p><b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	
<p><b>Impact Reduction Measures:</b></p> <ul style="list-style-type: none"> <li>• Only approved, native species would be used for revegetation. These plant species would not be invasive or noxious species, and disturbed areas would be restored or revegetated to the extent practicable following construction.</li> <li>• Construction equipment would be washed before and after coming to the site to the extent practicable to limit the transport of invasive species.</li> </ul>			
<p><b>Transportation and Traffic</b></p>			
<p><b>Construction:</b> Overall, short-term, minor adverse impacts to transportation resources (SR-80, US-191, and Pan American Avenue) from increased construction-related traffic. At the RHC LPOE, a long-term, negligible to minor, adverse impact on local roadways from permanent closure of Customs Avenue between Pan American Avenue and 1<sup>st</sup> Street. Temporary, minor adverse impacts to pedestrian facilities from walkway closures.</p> <p><b>Operations:</b> Overall, long-term, minor adverse impacts to transportation resources (SR-80 and US-191). For the City of Douglas, long-term, beneficial direct impact from relocation of COVs; long-term, minor to moderate, adverse, and indirect impact from increased efficiency of the RHC LPOE and an estimated 2% annual growth rate in POV traffic.</p> <p><b>Alternatives 1a – 1d:</b> Potential impacts already considered under Alternative 1 analysis. Temporary, minor adverse impacts under Alternatives 1c and 1d from additional trucks hauling debris during construction.</p>	<p><b>Construction:</b> Potential impacts similar to Alternative 1 but overlap of construction traffic from both LPOE sites would occur. Overall, short-term, minor to moderate adverse impacts to transportation resources (SR-80, US-191, and Pan American Avenue) from increased construction-related traffic. Similar adverse impacts to pedestrian facilities as Alternative 1 would occur at the RHC LPOE and additional expansion area.</p> <p><b>Operations:</b> Similar impacts as Alternative 1.</p> <p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p><b>Construction:</b> Potential impacts similar to Alternative 2. Overall, short-term, minor to moderate adverse impacts to transportation resources (SR-80, US-191, and Pan American Avenue) from increased construction-related traffic. Permanent closure of Customs Avenue east of the RHC LPOE and International Avenue south of the eastern expansion area would not add substantially to the impacts of Alternative 1 on local traffic. Similar adverse impacts to pedestrian facilities as Alternative 1 would occur at the RHC LPOE and additional expansion area.</p> <p><b>Operations:</b> Similar impacts as Alternative 1. After the relocation of COV traffic to the new Commercial LPOE, the closure of additional road segments for Alternative 3 would not be expected to affect adjacent roadways.</p> <p><b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p>Long-term, minor to moderate adverse impacts to transportation and traffic from increased traffic volumes, COV traffic remaining through the City of Douglas, and inefficient operations at RHC LPOE.</p>
<p><b>Impact Reduction Measures:</b></p> <ul style="list-style-type: none"> <li>• Minimize construction vehicle movement during peak traffic hours.</li> <li>• Place construction staging areas where they would least interfere with local traffic and parking.</li> </ul>			

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<ul style="list-style-type: none"> <li>• Minimize construction detours and impacts to pedestrians.</li> <li>• Develop a construction traffic and parking management plan in coordination with local officials and local business directly affected by street closures.</li> <li>• Develop and implement Transportation Demand Management strategies.</li> <li>• Implement traffic signal coordination on arterial streets where practical.</li> <li>• Coordinate with local, state, and federal transportation authorities when planning access to the RHC LPOE site.</li> </ul>			
<b>Noise</b>			
<p><b>Construction:</b> At the proposed Commercial LPOE, short-term, minor to moderate adverse noise impacts from construction activities and from COVs along transportation routes (SR-80 and US-191); closest three residential properties to proposed site are approximately 2,500 feet (one property) and 5,500 feet (two properties) to the north. At the RHC LPOE, short-term, minor to moderate adverse noise and vibration impacts from construction activities and from trucks along transportation routes (SR-80, US-191, and Pan American Avenue). Outdoor intermittent noise levels at closest residences on 1<sup>st</sup> Street of 86 to 88 dBA, and 68 dBA for closest residences on 3<sup>rd</sup> Street. Inside intermittent noise levels of 71 to 73 dBA (1<sup>st</sup> Street) and 53 dBA (3<sup>rd</sup> Street).</p> <p><b>Operations:</b> At the proposed Commercial LPOE, permanent, moderate adverse noise impacts to closest receptors (three residences within 1 mile) and to receptors along SR-80 and US-191. At the RHC LPOE, long-term beneficial noise impacts for receptors in City of Douglas from removal of COVs; long-term, minor indirect adverse noise impact from increased efficiency of the RHC LPOE and an estimated 2% annual growth in POV traffic.</p> <p><b>Alternatives 1a – 1d:</b> Potential impacts already considered under Alternative 1 analysis. Type and intensity of noise impact depends on sub-alternative but would range</p>	<p><b>Construction:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At the RHC LPOE, types of noise sources similar to Alternative 1; however, intensity of noise levels greater due to COV processing remaining onsite during construction at RHC LPOE, resulting in short-term, intermittent, moderate adverse noise impacts to same noise receptors identified under Alternative 1.</p> <p><b>Operations:</b> Similar impacts as Alternative 1.</p> <p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p><b>Construction:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At the RHC LPOE, impacts would be similar to Alternative 2 (including Alternative 1 impacts). However, demolition and construction at the Alternative 3 Expansion Area would occur closer to the downtown area, affecting sensitive noise receptors northeast of the RHC LPOE. Overall, Alternative 3 would have short-term, intermittent, moderate adverse noise impacts to receptors identified under Alternative 1, except for the commercial and residential receptors that would be displaced by acquisition of the Alternative 3 Expansion Area.</p> <p><b>Operations:</b> Similar impacts as Alternative 1.</p> <p><b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p>Long-term, minor to moderate adverse impacts to noise from ongoing maintenance activities at the RHC LPOE and from COV traffic remaining through the City of Douglas.</p>

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
from temporary negligible to temporary minor, adverse impacts.			
<p><b>Impact Reduction Measures:</b></p> <ul style="list-style-type: none"> <li>• Implementation of noise control measures, such as project scheduling, noise barriers, and using noise controls on equipment (e.g., mufflers).</li> <li>• Conduct construction activities within hours that are in accordance with local noise ordinances to the extent practicable.</li> <li>• If a variation from normal construction hours is required, a variance permit from the City of Douglas or Cochise County may be required.</li> <li>• Provide notification to properties adjacent to the project boundary in advance of times of peak construction when the use of loudest equipment would be used for longer periods of time.</li> </ul>			
<b>Infrastructure and Utilities</b>			
<p><b>Construction:</b> At the proposed Commercial LPOE, short-term, moderate adverse impacts to West International Avenue from construction activities at the site; and short-term, negligible adverse impacts to public utilities from increased demands for construction. At the RHC LPOE, short-term, moderate adverse impacts on facilities and roadway network from construction activities; short-term, negligible adverse impacts to utilities from increased demand; and intermittent, minor adverse impacts from potential service disruptions.</p> <p><b>Operations:</b> At the proposed Commercial LPOE, long-term, moderate beneficial impacts to facilities from new infrastructure and utilities; long-term negligible to minor adverse impacts to public utilities from increased demand. At the RHC LPOE, long-term moderate beneficial impacts from new, improved infrastructure and long-term, negligible to minor adverse impacts to utilities from increased demand.</p> <p><b>Alternatives 1a – 1d:</b> Potential impacts already considered under Alternative 1 analysis. Type and extent of impacts dependent on sub-alternative chosen; range of impacts includes temporary, negligible to</p>	<p><b>Construction:</b> Potential adverse impacts similar as Alternative 1 at both LPOE locations, but slightly greater due to greater demand on utilities from concurrent construction and additional utility coordination due to natural gas utilities located in the Alternative 2 Expansion Area, resulting in short-term, negligible adverse impacts to utilities. Impacts to facilities would be similar to Alternative 1, but only minor adverse due to shorter construction period.</p> <p><b>Operations:</b> Potential beneficial impacts to facilities comparable to Alternative 1. Potential negligible to minor adverse impacts similar as Alternative 1. At the RHC LPOE, long-term, negligible to minor, adverse impacts to water/wastewater systems and stormwater system from increased demand and runoff, respectively.</p> <p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p><b>Construction:</b> Potential adverse impacts comparable to Alternative 2 at both LPOE locations, but slightly greater at the RHC LPOE because of need for additional coordination with service providers during demolition and construction of infrastructure and utilities at the Alternative 3 Expansion Area. Overall, short-term, minor, and adverse.</p> <p><b>Operations:</b> Potential beneficial impacts to facilities comparable to Alternative 1. Potential negligible to minor adverse impacts to utilities similar to Alternative 1. At the RHC LPOE, long-term, negligible to minor, adverse impacts depending on the extent of redevelopment and need for stormwater structures and BMPs.</p> <p><b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p>Long-term, minor to moderate adverse impacts from ongoing demand on and degradation of infrastructure and utilities; increased need for maintenance as building systems continue to age.</p>

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<p>minor adverse impacts on utilities from potential service disruption to users.</p>			
<p><b>Impact Reduction Measures:</b></p> <ul style="list-style-type: none"> <li>• Adherence to GSA’s P100 Standards (Facilities Standards for the Public Buildings Service).</li> <li>• Buildings would be “net zero” ready on a source energy basis with onsite renewables for future installation.</li> <li>• Coordinating with utility providers in advance by implementing measures to protect utility lines or by arranging for their temporary or permanent relocation.</li> </ul>			
<p><b>Socioeconomics</b></p>			
<p><b>Construction:</b> Overall, short-term, negligible impacts on population and housing; up to 100 workers would be directly hired, but mostly not expected to relocate to area. Short-term, minor, beneficial, and direct impact on unemployment and income from job creation. Short-term, moderate to significant, beneficial, and indirect impact from materials and equipment purchases, as well as indirect and induced job creation from wages spent in local economy. Temporary, minor adverse impacts on local businesses adjacent to RHC LPOE as commercial operations relocate to proposed Commercial LPOE. Long-term, minor, adverse impact for the businesses on 1<sup>st</sup> Street from the closure of Customs Avenue and the relocation of a bus stop. Temporary, minor adverse impacts to nearby neighborhoods from decreased quality of life due to increased noise levels, air pollutants, and traffic associated with construction.</p> <p><b>Operations:</b> Long-term, negligible to minor, beneficial, and direct impacts to population and housing from an additional 150 workers hired. Long-term, moderate to significant, beneficial, and direct impacts to labor and earnings from additional \$10.8 to \$20 million to revenue per year to City of Douglas and Cochise County. Long-term minor to moderate, beneficial, direct and indirect impact on unemployment in all industries in Cochise</p>	<p><b>Construction:</b> Overall, similar socioeconomic impacts as Alternative 1, except up to 200 workers would be hired at one time. Spending on labor and materials would be similar but likely less than under Alternative 1, due to decreased cost escalation and inflationary pressures as a result of the compressed project timeline. Impacts would be greater in the near term, but would occur for a shorter duration than under Alternative 1.</p> <p><b>Operations:</b> Same impacts as Alternative 1.</p> <p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p><b>Construction:</b> Overall, similar socioeconomic impacts as Alternative 2. Acquisition of Alternative 3 Expansion Area would displace at least one active business, 3 residential occupants, and various ongoing storage uses on properties owned by other businesses, which would have direct, short- to long-term, minor to moderate adverse impacts. In addition to impacts described for Alternative 1, demolition and construction in the Alternative 3 Expansion area could intermittently impede access to logistics businesses on the north side of 1<sup>st</sup> Street, which would be short-term, minor to moderate and adverse.</p> <p><b>Operations:</b> Same impacts as Alternative 1.</p> <p><b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p>Long-term, minor adverse socioeconomic impacts to businesses and regional economy from loss of RHC LPOE capacity and efficiency over time and from COVs remaining in the City of Douglas, hindering revitalization plans and economic growth. Potential short-term and long-term socioeconomic benefits from direct, indirect, and induced jobs from the Proposed Action would not occur.</p>

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<p>County. Long-term, moderate to significant, beneficial, and indirect impacts from commercial and industrial business growth around the Commercial LPOE. Long-term, minor to moderate, beneficial impacts to quality of life in the City of Douglas from removal of COVs. Long-term, minor adverse impacts from increasing population and contributing to unfavorable student-to-teacher ratios.</p> <p><b>Alternatives 1a – 1d:</b> Potential impacts already considered under Alternative 1 analysis.</p>			
<p><b>Impact Reduction Measures:</b> No specific impact reduction measures would be applicable to Socioeconomics.</p>			
<p><b><i>Environmental Justice and Protection of Children’s Health and Safety</i></b></p>			
<p><b>Construction:</b> No disproportionately high and adverse impacts to minority or low-income populations. At the proposed Commercial LPOE, potential adverse impacts to minority populations from short-term, minor increases in air pollutants, traffic congestion, and noise, and short-term, minor beneficial impacts from increased job opportunities. At the RHC LPOE, potential adverse impacts to minority and low-income populations from short-term, minor increases in air pollutants, traffic congestion, and noise, and short-term, minor beneficial impacts from increased job opportunities. Short-term, negligible to minor, and short-term, minor to moderate adverse impacts to child populations, respectively, at the proposed Commercial LPOE and RHC LPOE due to increased air pollutants, traffic congestion, and noise.</p> <p><b>Operations:</b> No disproportionately high and adverse impacts to minority or low-income populations. At the proposed Commercial LPOE site, adverse impacts to minority populations from short-term, minor increased</p>	<p><b>Construction:</b> Similar impacts as Alternative 1 with respect to environmental justice and child populations. No disproportionately high and adverse impacts to minority or low-income populations. Impacts to environmental justice and child populations would be shorter duration than Alternative 1; however, air pollutants, traffic, and noise have greater intensity than Alternative 1.</p> <p><b>Operations:</b> Similar impacts as Alternative 1 with respect to environmental justice and child populations. No disproportionately high and adverse impacts to minority or low-income populations. Alternative 2 Expansion Area is greater than for Alternative 1, so extent of impacts would be greater; additional loss of trails of Paseo de Las Americas Linear Park.</p> <p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p><b>Construction:</b> Acquisition of three residences in the Alternative 3 Expansion Area would displace occupants in an area characterized by high concentrations of minority and low-income populations. Although not significant at a population level, environmental justice impacts may be greater for Alternative 3 than for the other alternatives. Similarly, the potential displacement for Alternative 3 of families with children living in the residences may affect the health and safety of child populations in the area more adversely than would the other alternatives. GSA would negotiate with private landowners as applicable during the land acquisition process to provide fair compensation. Otherwise, impacts during construction of Alternative 3 would be similar as described for Alternative 1 both for the Commercial LPOE and RHC LPOE.</p> <p><b>Operations:</b> Similar impacts as Alternative 1 with respect to environmental justice and child populations. No disproportionately</p>	<p>No impacts to environmental justice or child populations, although potential beneficial impacts from removal of COVs through the city and from increased job opportunities would not occur.</p>

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<p>air pollutants, COV traffic, and associated noise. Long-term, negligible to moderate beneficial impacts to low-income and minority populations from increased job opportunities. Overall negligible adverse impacts to child populations. At the RHC LPOE, long-term, minor beneficial impacts from removal of COVs (improved air quality, congestion and noise) and job opportunities; permanent, minor adverse impacts to minority and low-income populations from loss of recreational space; negligible to minor beneficial and adverse impacts to child populations from removal of COVs.</p> <p><b>Alternatives 1a – 1d:</b> Potential impacts already considered under Alternative 1 analysis.</p>		<p>high and adverse impacts to minority or low-income populations. Alternative 3 Expansion Area is greater than for Alternative 1, so extent of impacts would be greater.</p> <p><b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	
<p><b>Impact Reduction Measures:</b> Impact reduction measures for resources specific to environmental justice – i.e., air pollutants, traffic, and noise – are discussed in the respective resource areas (Air Quality and Greenhouse Gas Emissions; Transportation and Traffic; and Noise).</p>			
<p><b>Human Health and Safety</b></p>			
<p><b>Construction:</b> At both LPOEs, short-term, negligible adverse impacts to worker safety from construction activities; short-term, negligible to minor adverse impacts from hazardous materials and waste handling.</p> <p><b>Operations:</b> At proposed Commercial LPOE, long-term, negligible adverse effects on human health and safety from hazardous materials and waste handling. At the RHC LPOE, long-term, minor to moderate beneficial impacts on human health and safety of CBP workers and the public from the relocation of COVs and reconfiguration of POV and pedestrian routing within the RHC LPOE. Negligible adverse effects on human health and safety and from hazardous materials and waste handling.</p>	<p><b>Construction:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At the RHC LPOE, adverse impacts to human health and safety from hazardous materials and waste handling would be similar but would be greater due to greater acreage of expansion area and higher potential for encountering potentially contaminated soils and construction debris. There would also be increased risk of traffic accidents due to COVs remaining onsite at RHC LPOE during construction.</p> <p><b>Operations:</b> Same impacts as Alternative 1.</p> <p><b>Alternatives 2a – 2d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	<p><b>Construction:</b> At proposed Commercial LPOE, same impacts as Alternative 1. At the RHC LPOE, adverse impacts to human health and safety from hazardous materials and waste handling would be similar, but Alternative 3 would require the demolition and removal of approximately 13 buildings and structures east of Customs Avenue with potential presence of asbestos and lead paint throughout the interior of the buildings due to their age. Also, the presence of hazardous materials, waste tires, automotive waste, and other waste materials in buildings on the site would create safety issues and require their proper disposal and management. There would also be increased risk of traffic</p>	<p>Negligible impacts from ongoing maintenance, resulting in use of hazardous materials and generation of hazardous waste. COV processing would not be relocated and hazardous materials would continue to be transported through downtown Douglas.</p>

Alternative 1 – Sequential Construction	Alternative 2 – Concurrent Construction (Westward Expansion)	Alternative 3 – Concurrent Construction (Eastward Expansion)	No Action Alternative
<p><b>Alternatives 1a – 1d:</b> Potential impacts on human health and safety considered under Alternative 1 analysis would be short-term, minor, and adverse during construction, and long-term, minor, and beneficial during operations.</p>		<p>accidents due to COVs remaining onsite at RHC LPOE during construction.  <b>Operations:</b> Same impacts as Alternative 1.  <b>Alternatives 3a – 3d:</b> Impacts from sub-alternatives would be same as Alternatives 1a – 1d.</p>	

**Impact Reduction Measures:**

- If PCB-containing materials are identified onsite, appropriate abatement actions would be implemented in accordance with regulatory requirements. If present in underlying soils, appropriate abatement actions would be implemented in accordance with applicable regulatory requirements.
- All spills or releases of POLs; hazardous materials; pollutants; or contaminants would be handled in accordance with measures outlined in a Spill Prevention and Response Plan prepared for construction.
- As a BMP, a Soil Management Plan may be prepared to address the potential for encountering areas of environmental concern during subsurface disturbance.
- All personnel would follow standard operating procedures for hazardous waste and material handling, and all waste would be disposed of in accordance with applicable federal, state, and local regulations.
- A USEPA Identification Number would be obtained if more than 100 pounds of hazardous waste is generated under any alternative.
- If Alternative 3 is selected, GSA would consider the need to conduct further investigations within the Alternative 3 Expansion Area related to VOCs associated groundwater contamination underlying the parcel.
- If Alternative 3 is selected, GSA would consider the need to conduct a GPR and Electro Magnetic survey within the Alternative 3 Expansion Area to further identify for the presence of any USTs at the site prior to construction.
- Construction workers would adhere to safety standards promulgated in 29 CFR Chapter 17 to protect against workplace hazards. To minimize potential exposure or safety concerns to workers, appropriate personal protective equipment would be worn.

ACHP = Advisory Council on Historic Preservation; BMP = best management practice; CGP = Construction General Permit; COV = commercially owned vehicle; dBA = A-weighted decibel; GSA = General Services Administration; GHG = greenhouse gas; LEED = Leadership in Energy and Environmental Design; LPOE = land port of entry; NEPA = National Environmental Policy Act; NHPA = National Historic Preservation Act; PCB = polychlorinated biphenyl; PM = particulate matter; POV = personally owned vehicle; RHC = Raul Hector Castro; SHPO = State Historic Preservation Officer; SR-80 = State Route 80; US-191 = U.S. Highway 191; VOC = volatile organic compound; WCM = water conservation measure

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## CHAPTER 3 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

Chapter 3 describes the existing environmental conditions within the region of influence (ROI) of the Proposed Action, to include near the RHC LPOE and proposed Commercial LPOE site. This chapter also identifies the potential environmental consequences of the Proposed Action, including Alternative 1, Alternative 2, Alternative 3, and the No Action Alternative, as detailed in Chapter 2. Resource areas analyzed in this EIS include: cultural resources; air quality and greenhouse gas emissions; land use and visual resources; geology and soils; water resources; biological resources; transportation and traffic; noise; infrastructure and utilities; socioeconomics; environmental justice and protection of children's health and safety; and human health and safety.

### 3.1 METHODOLOGIES

#### 3.1.1 Affected Environment Methodology

The affected environment summarizes the current physical, biological, social, and economic environments of the area within the ROI of the Proposed Action, to include near the RHC LPOE and proposed Commercial LPOE site, located about 5 miles west of the existing port. The ROI defines the extent of the area where direct effects from project-related construction and operation may be experienced and also encompasses the areas where indirect effects from the Proposed Action would most likely occur. As such, the extent of the ROI varies by environmental resource area depending upon the scope of potential impacts from the Proposed Action and alternatives (i.e., site-specific versus regional baseline conditions). For example, the geographic area of analysis for some environmental resources extends beyond the property line of the RHC LPOE to encompass a city- or county-level analysis (e.g., air quality); however, the ROI for the majority of the resource areas in this EIS are generally contained within the footprint of the project boundaries (e.g., geology and soils).

#### 3.1.2 Environmental Consequences Methodology

The impacts analysis considers effects to a resource for each alternative and describes the types of impacts that would occur (Section 3.1.2.1) and assigns a significance criteria (Section 3.1.2.2).

##### 3.1.2.1 Types of Impacts

The terms "impacts" and "effects" are used interchangeably in this chapter. According to the CEQ NEPA Regulations at 40 CFR 1500-1508, *direct* and *indirect* effects are defined as:

- **Direct effects** – Effects, *which are caused by the action and occur at the same time and place* (1508.1(g)(1)). In other words, direct impacts are those that are caused directly and immediately from project-related activities, such as excavation of land to construct the proposed Commercial LPOE that could cause soil erosion. Most direct effects are confined to the project footprint, but some may extend beyond the project boundary (e.g., noise).
- **Indirect effects** – Effects, *which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable*. 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 effects on air and water and other natural systems, including ecosystems (1508.1(g)(2)). Indirect effects are spatially removed from project-related activities and/or occur later in time but are reasonably certain to occur. For example, soil erosion could lead to adverse impacts on water quality, such as causing turbidity and sedimentation in streams during rain events. These types of impacts tend to be diffuse, resource-specific, and less amenable to quantification or mapping than direct effects.

Identified impacts may be either *adverse* or *beneficial*. For the purposes of this EIS, the following definitions are used in the impacts analyses:

- **Adverse impacts** – Those impacts which, in the judgment of an expert resource area analyst, are regarded by the general population as having a negative and harmful effect on the analyzed resource area.
- **Beneficial impacts** – Those impacts which, in the judgment of an expert resource area analyst, are regarded by the general population as having a positive and supportive effect on the analyzed resource area.

### 3.1.2.2 Significance Criteria

Criteria were defined as a means of measuring the size of the impact and its significance. The significance of impacts was determined systematically by assessing the magnitude (how much) and duration (how long) of an impact. Table 3.1-1 summarizes how each parameter is categorized. Significance thresholds are further defined for each resource within the respective sections.

**Table 3.1-1. Summary of Environmental Impact Parameters**

<b>Magnitude</b>	
Significant	Substantial impact or change in a resource area that is easily defined, noticeable and measurable, or exceeds a standard.
Moderate	Noticeable change in a resource area occurs, but the integrity of the resource area remains intact.
Minor	Change in a resource area occurs, but no substantial resource area impact results.
Negligible	The impact is at the lowest levels of detection – barely measurable but with perceptible consequences.
None	The impact is below the threshold of detection with no perceptible consequences.
<b>Duration</b>	
Permanent	Impact would last indefinitely.
Long-term	Impact would likely last the lifetime of the project, or for as long as any new construction is in operation.
Short-term	Impact would last the duration of the construction phase.
Temporary	Impact would be continuous and last for a portion of the construction phase.
Intermittent	Impact would not be constant or continuous but rather recurring or periodic. Intermittent impacts could occur temporarily or in the short or long-term.

## 3.2 CULTURAL RESOURCES

This section describes the baseline conditions for cultural resources at or near the project areas and assesses historic and archaeological resources within the project areas to affect, or be affected by, implementing the Proposed Action, including the alternatives as discussed in Chapter 2. This EIS uses the following terms related to cultural resources:

- Historic properties are defined as: any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. This term also includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the NRHP criteria.
- Traditional cultural properties are a type of historic property eligible for the NRHP because of their association with cultural practices or beliefs of a living community that: (1) are rooted in that community's history or (2) are important in maintaining the continuing cultural identity of the community.
- Cultural resources include the remains and sites associated with human activities, such as prehistoric and ethno-historic Indian archaeological sites, historic archaeological sites, historic buildings and structures, and elements or areas of the natural landscape. Cultural resources determined to be NRHP-eligible or potentially eligible are historic properties.

### 3.2.1 Affected Environment

#### 3.2.1.1 *Region of Influence*

The ROI for cultural resources is referred to as the Area of Potential Effect (APE), which is the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties if such properties exist. The APE for this project includes the area within the proposed site boundary of the Commercial LPOE (as shown in Figure 2-2) and the areas within the RHC LPOE property boundary and associated expansion area boundaries for Alternatives 1, 2, and 3 (as shown in Figure 2-1). An undertaking means a project, activity, or program funded in whole, or in part, under the direct or indirect jurisdiction of a federal agency, including, among other things, processes requiring a federal permit, license, or approval. In this case, the undertaking includes any demolition, construction, and renovation activities within the APE.

Adverse effects to historic properties can include direct or indirect effects. Adverse effects to archaeological and paleontological resources are generally the result of direct impacts from ground-disturbing activities. The APE for such resources therefore coincides with those areas where direct impacts from the construction and operation of a proposed facility would occur (i.e., the project footprint). Adverse effects to architectural resources may occur through direct impacts that could change the character of a property's use or the physical features within a property's setting that contribute to its historic significance, or through impacts that could introduce visual, atmospheric, audible, or vibration elements that diminish the integrity of a property's significant historic features. Traditional cultural properties may be subject to both direct and indirect impacts. As such, the APE could also include areas outside of the project footprint. In this case, the APE does not include any areas outside of the project footprint, as there were no known historic properties adjacent to the project areas.

#### 3.2.1.2 *Regulatory Setting and Requirements*

*National Environmental Policy Act.* NEPA establishes guidelines to "preserve important historic, cultural, and natural aspects of our national heritage, and to maintain, wherever possible, an environment that supports diversity and a variety of individual choice" [42 U.S.C. 4331 (b)(4)]. Impacts considered under NEPA include those on cultural and historic resources (40 CFR 1508.8).

**National Historic Preservation Act.** The NHPA (16 U.S.C. 470), as amended, establishes a program for the preservation of historic properties throughout the nation and sets forth guidelines to determine the eligibility of historic properties for inclusion in the NRHP. Under the law, federal agencies must approach historic properties in the spirit of stewardship and must appropriately involve the public. The two portions of the law most often applied to projects on GSA properties are: Section 110, which mandates proactive identification and management of cultural resources actions; and Section 106, which requires agencies to consider the effects of their actions on historic properties.

**National Register of Historic Places.** The NRHP is authorized by the NHPA and is the nation's official list of buildings, structures, objects, sites, and districts worthy of preservation because of their significance in American history, architecture, archeology, engineering, and culture. The NRHP recognizes resources of local, state, and national significance that have been documented and evaluated according to uniform standards and criteria. The NRHP is part of a national program managed by the National Park Service to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archaeological resources.

The following criteria are used to identify resources that qualify for listing in the NRHP. The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity and:

- Criterion A – Are associated with events that have made a significant contribution to the broad patterns of our history; or
- Criterion B – Are associated with the lives of persons significant in our past; or
- Criterion C – Embody distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- Criterion D – Have yielded, or may be likely to yield, information important in prehistory or history.

Ordinarily cemeteries, birthplaces, or graves of historical figures; properties owned by religious institutions or used for religious purposes; structures that have been moved from their original locations; reconstructed historic buildings; properties primarily commemorative in nature; and properties that have achieved significance within the past 50 years are not considered eligible for the NRHP. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- A building or structure removed from its original location, but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his productive life; or
- A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or

- A property primarily commemorative in intent, if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or
- A property achieving significance within the past 50 years if it is of exceptional importance.

In order to be eligible for listing in the NRHP, a property must retain sufficient integrity to convey its significance. The NRHP publication *How to Apply the National Register Criteria for Evaluation* establishes how to evaluate the integrity of a property: “Integrity is the ability of a property to convey its significance” (NPS 1995). The evaluation of integrity must be grounded in an understanding of a property’s physical features and how they relate to the concept of integrity. Determining which of these aspects are most important to a property requires knowing why, where, and when a property is significant. To retain historic integrity, a property must possess several, and usually most, aspects of integrity:

- **Location** is the place where the historic property was constructed or the place where the historic event occurred.
- **Design** is the combination of elements that create the form, plan, space, structure, and style of a property.
- **Setting** is the physical environment of a historic property and refers to the character of the site and the relationship to surrounding features and open space. Setting often refers to the basic physical conditions under which a property was built and the functions it was intended to serve. These features can be either natural or manmade, including vegetation, paths, fences, and relationships between other features or open space.
- **Materials** are the physical elements that were combined or deposited during a particular period or time, and in a particular pattern or configuration to form a historic property.
- **Workmanship** is the physical evidence of crafts of a particular culture or people during any given period of history or prehistory and can be applied to the property as a whole or to individual components.
- **Feeling** is a property’s expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, when taken together, convey the property’s historic character.
- **Association** is the direct link between the important historic event or person and a historic property.

**Section 106 Consultation.** Section 106 of the NHPA (36 CFR 800) requires GSA to consult with the SHPO on the determination of eligibility on any property within the APE and on any determination of effect on historic properties. Further, it allows the Advisory Council on Historic Preservation (ACHP) an opportunity to comment on any finding of effects on historic properties. If Native American properties have been identified, Section 106 also requires that GSA consult with interested tribes who might attach religious or cultural significance to such properties. In the state of Arizona, the SHPO is a division of Arizona State Parks. The role and function of the Arizona SHPO is defined in both the State Historic Preservation Act and NHPA.

**Archaeological and Historic Preservation Act of 1974.** The purpose of the Archaeological and Historic Preservation Act (54 U.S.C 312501-312508) is to preserve significant historical and archeological data which might otherwise be irreparably lost or destroyed as a result of a number of incidents or developments, including federal construction projects. This data may include sites, buildings, objects, and antiquities of national significance. Protection of these resources may include surveys and recovery efforts when deemed appropriate.

***Archeological Resources Protection Act of 1979.*** The Archeological Resources Protection Act (16 U.S.C. 470aa-mm) governs the excavation of archaeological sites on federal and tribal lands and the removal and disposition of archaeological collections from those sites. This Act provides legal penalties and establishes a permitting system to authorize excavation or removal of archaeological resources by qualified applicants.

***Native American Graves Protection and Repatriation Act of 1990.*** The Native American Graves Protection and Repatriation Act (NAGPRA) (25 U.S.C. 3001 et seq.) provides for ownership and control of Native American cultural items which are excavated or discovered on federal or tribal lands since the passage of the Act. The Act provides a process for museums and federal agencies to return certain Native American cultural items to lineal descendants and culturally affiliated Indian tribes.

### **3.2.1.3 Existing Conditions**

In compliance with Section 106 of the NHPA a cultural resources study for this project was conducted to determine the presence or absence of potentially significant prehistoric and historical resources within the project APE and to determine the project's potential impacts on identified cultural resources. The study comprised a records search and field surveys conducted in September 2022, including archaeological and architectural surveys within the project APE (ASMA 2023). An additional records search and field survey were conducted for this revised DEIS in June 2023 for the Alternative 3 Expansion Area as shown in Figure 2-1, to analyze the Alternative 3 footprint. Findings from the studies are used by GSA to assess the potential impacts to cultural resources and to provide data to aid in the consultation with the Arizona SHPO, ACHP, federally recognized Indian tribes, and other consulting parties.

Prior to the archaeological surveys, a review was conducted of all relevant site records and reports available from the Arizona State Museum AZSITE database for the APE and a 1-mile search radius as part of the cultural resources study. Other records search activities included on-site archival research conducted at the Douglas Public Library and research from miscellaneous background materials, such as aerial photos and historic maps, and online newspaper archives.

The archaeological survey area consisted of pedestrian surveys at the proposed Commercial LPOE site and the undeveloped areas of the proposed expansion areas near the RHC LPOE. The architectural survey comprised areas at and adjacent to the RHC LPOE.

GSA did not identify any known or previously recorded traditional cultural properties during the archival records research. To date, the recognized Indian tribes have not identified any traditional cultural properties within the APE. GSA distributed letters on January 19, 2023, to eight federally recognized Indian tribes that may have an interest in the region in compliance with NHPA requirements (see Appendix B). Responses were received from the Pascua Yaqui Tribe on January 23, 2023; the San Carlos Apache Tribe on February 7, 2023; and the White Mountain Apache Tribe on February 8, 2023 and March 2, 2023. The Pascua Yaqui Tribe provided clarifications on the cultural and historic overview of the region but indicated they did not have information that suggests unreported heritage resources of importance to the tribe. The San Carlos Apache Tribe and the White Mountain Apache Tribe concurred with GSA's finding of no adverse effects to historic properties. Refer to Appendix B for copies of consultation with federally recognized Indian tribes.

### **Commercial LPOE**

An archaeological survey was conducted in September 2022 at the 80.5-acre proposed site for the Commercial LPOE. The site is generally an undeveloped, vacant site with clusters of dense desert vegetation, with a similar desert landscape surrounding the site on all sides. During the archaeological survey, tire tracks, most likely from CBP activity, were evident throughout the site. Additionally, evidence of human migration in the form of abandoned backpacks, clothing, and plastic bottles was present throughout the site. One new archaeological resource site and 16 isolated finds within the proposed Commercial LPOE site were identified and documented during the survey.

The one newly identified archaeological site was characterized as a historic refuse scatter, representing the remains of a short-term camp or a previously discrete domestic refuse site located at the northeast corner of the project site. The site may have been associated with past ranching activity likely related to cattle trade that occurred between Sonora, Mexico and the U.S. in the early and mid-20<sup>th</sup> century in and around Douglas. Based on the archaeological survey and background research, this newly identified archaeological site is recommended not eligible under any NRHP criteria.

The isolated finds were mainly historic period refuse comprising beverage containers, glass electrical insulator fragments, and other miscellaneous items. Based on their constituency and distribution, historic period isolated finds were likely spread across the project site by both natural wind and hydrological events, as well as by various human activities and disturbances such as historic period ranching, public recreational activity, CBP activity, and movement of migrants. Isolated finds are considered not NRHP-eligible.

### **RHC LPOE**

An archaeological survey was conducted in September 2022 at all accessible areas of exposed ground surface within the APE for the RHC LPOE and Alternative 1 and 2 Expansion Areas. The entirety of the survey area was found to be heavily modified over time, and no evidence of any original ground surfaces was observed within the survey area. The southern portion of the survey area, which was partially surrounded by a wooden and wire fence, was largely inaccessible and could not be surveyed due to extremely dense vegetation with virtually no ground surface visibility; however, it was observed that this area had also been heavily modified during the historic ranching period. Past aerial photographs show a series of troughs aligned north-south near the center of the fenced area, and a building, identified later in this section as the Cattle Operation Building, is located just west of the RHC LPOE, near the southeast corner of the survey area.

An archaeological survey was conducted in June 2023 at all accessible areas of exposed ground surface within the APE for the RHC LPOE and Alternative 3 Expansion Area. Accessible areas of exposed ground surface within the expanded APE to the east of the RHC LPOE were very limited, and all were heavily modified by the commercial and residential uses of the parcels over time. A large vacant portion of parcel 409-09-001A at the eastern edge of the Alternative 3 Expansion Area appeared to have been scraped and compacted with a gravel covering, leaving virtually no vegetation or surface soils remaining. Other open-land portions of the expansion area in parcel 409-09-006 and between buildings in other parcels were heavily modified and cleared or overgrown with vegetation. No cultural resources were identified.

An architectural survey was conducted in September 2022 at the RHC LPOE and the Alternative 1 and 2 Expansion Areas. Two previously identified architectural historic properties are located within the RHC LPOE property boundary — the historic Main Building and Garage. Additionally, two commercial buildings and one agricultural building that are more than 50 years old were identified in the Alternative 1 and 2 Expansion Areas, north and west of the RHC LPOE, respectively.

An architectural survey was conducted in June 2023 for the Alternative 3 Expansion Area. The survey identified six buildings in the expansion area east of the RHC LPOE that are more than 50 years old, including a privately owned residence and a commercial building located on 1<sup>st</sup> Street, a commercial building on the corner of 1<sup>st</sup> Street and Customs Avenue, two commercial buildings facing Customs Avenue, and a commercial building facing International Avenue. The survey determined that all other buildings in the eastern expansion area are less than 50 years old and not considered further as potential historic properties.

The buildings are discussed briefly below (refer to Figure 3.4-5 in Section 3.4 for parcel locations).

***Historic Main Building (at the RHC LPOE, parcel 409-09-007).*** The historic Main Building was previously evaluated as a historic property in 2009 and listed individually in the NRHP in 2014 under Criterion A under the theme of Government as developed in the U.S. Border Inspection Stations Multiple Property Documentation Form, where a property must have been used by the U.S. government as a customs

and immigration border inspection facility and must represent the government’s response to the important chain of events related to customs, immigration law, and the increased use of motor vehicles at border crossings (ASMA 2023). The Main Building was constructed in 1933 along Railroad Avenue, now called Pan American Avenue, in an “L” shape. It features elements of the Spanish Colonial Revival design in its exterior details. Currently, a mural that is glazed onto porcelain tiles runs along the western wall of the Main Building. The mural consists of colorful artistic depictions of travelers walking into the United States. Pedestrian processing activities take place at the historic Main Building.



Southern entrance



Eastern façade

**Figure 3.2-1. Images of the Historic Main Building at the RHC LPOE**

**Historic Garage (at the RHC LPOE, parcel 409-09-007).** The historic Garage was previously evaluated as a historic property in 2009 and was listed in the NRHP as part of the U.S.–Inspection Station - Douglas property in 2014 under Criterion A under the themes of Government as developed in the Multiple Property Documentation Form (ASMA 2023). The Garage was constructed simultaneously with the Historic Main Building in 1933. Its design in both exterior color and detailing match the Main Building, also featuring elements of the Spanish Colonial Revival design. The historic Garage is currently used as office and storage space and as a tool shop.



Northern façade



Eastern façade

**Figure 3.2-2. Images of the Historic Garage at the RHC LPOE**



***Commercial Store (100 Pan American Avenue, in Alternative 1 Expansion Area, parcel 409-09-010).***

The commercial store on the corner of 1<sup>st</sup> Street and Pan American Avenue has not previously been evaluated. It is part of an irregularly shaped commercial block with multiple store fronts. Together, these store fronts are part of a strip mall called Gaytan Plaza. Assessor information from Cochise County listed the date of construction for the original building as 1926, 1927, and 1929, although on digitized information the accepted date of construction appears to be 1927. The layout of the original building includes the entirety of the southern façade, and half of the eastern and western façades. Because of the addition of the new commercial space to the north of the building, the original northern façade is no longer extant. The original building is clad in stylistic reference to the Spanish Colonial Revival style. A new building was constructed adjacent to 100 Pan American Avenue in the 1990s, though the two buildings are not interconnected.

The building’s location places it within a historic ethnic enclave called “Oro y Plata,” identified within the Douglas Historic Resources Survey. This enclave was composed primarily of Mexicans and Mexican American business owners, the majority of whom owned and operated grocery stores, reflecting a time in Douglas’ history when the boundary of the border was blurred, and Mexican merchants ran successful shops and businesses for both the people of Douglas and international travelers. This historic ethnic enclave was prominent during the development and initial years of prosperity of the city between 1900 and 1920. Because 100 Pan American Avenue was a grocery store that was owned and operated by George Gaytan, a Mexican-born Mexican American, it has the potential to be eligible under NRHP Criterion A as an example of a grocery store owned by a Mexican-born family within the described boundary of the historic ethnic enclave. Accordingly, the cultural resources study concluded that an assessment of integrity is warranted.

The findings of the cultural resources study concluded that 100 Pan American Avenue retains low integrity of setting, materials, feeling, and association (four of the essential aspects of integrity under NRHP Criterion A); therefore, it is recommended not eligible under NRHP Criterion A. Because research did not reveal that the building is associated with any historically significant individuals, it is recommended not eligible under NRHP Criterion B. Because the building does not embody the distinctive characteristics of a style, period, region, method of construction, nor the work of a master it is recommended not eligible under NRHP Criterion C. Because the building is a common property type that does not have the potential to provide information about history or prehistory that is not available through historic research, it is recommended not eligible under NRHP Criterion D. Therefore, the cultural resources study concluded that 100 Pan American Avenue is recommended not eligible under any NRHP criteria (ASMA 2023).



Façade facing parking lot



Eastern façade

**Figure 3.2-3. Images of Commercial Building (100 Pan American Avenue)**

***City Park Bathroom Building (Pan American Avenue/Customs Avenue, in Alternative 1 Expansion Area, parcel 409-09-011A).*** The bathroom building on the corner of Pan American Avenue and Customs Avenue has not previously been evaluated. It is located within a small city park with a gazebo picnic area and a park bathroom. The City of Douglas owns this parcel of land, and the structures constructed on it are city property. The bathroom building is a vernacular building void of stylistic references and is a common architectural form. Due to limited availability of data, it is estimated that the construction of the bathroom building occurred between 1969 and 1996 or possibly between 1984 and 1996. Based on the architectural survey and background research, the cultural resources study concluded that the bathroom building located at the corner of Pan American Avenue and Customs Avenue is recommended not eligible under any NRHP criteria (ASMA 2023).



Front and southern façade



Rear and northern façade

**Figure 3.2-4. Images of City Park Bathroom Building  
(Pan American Avenue/Customs Avenue)**

***Cattle Operation Building (in Alternative 2 Expansion Area, parcel 409-09-070A).*** The Cattle Operation Building is constructed in a shed form, with wooden roof planks, wood-framed windows, and a single wood recessed-panel door. The building is a vernacular building void of stylistic reference or design. It was constructed in 1961 as one of three buildings constructed to support a local cattle trade business. Cochise County Assessor's Information reveals that the brick that is visible along the interior and exterior is burnt adobe. In 1991, one of the buildings surrounding the Cattle Operation Building burned and was lost, and the other building was demolished in 1995. The land was sold in 1997, and it is likely that it was at this time that the Cattle Operation Building was fully abandoned. The exterior is surrounded by overgrown vegetation on all sides, contributing to its poor condition. A few feet from the entrance to the Cattle Operation Building are the remnants of metal fencing as well as a concrete water trough. Based on the architectural survey and background research, the cultural resources study concluded that the Cattle Operation Building is recommended not eligible under any NRHP criteria (ASMA 2023).



Northern façade



Interior of Cattle Operation Building

**Figure 3.2-5. Images of the Cattle Operation Building**

*Single Family Residence (239 E. 1<sup>st</sup> Street in Alternative 3 Expansion Area, parcel 409-09-004).* The property was constructed as a single-family residence in 1960 by the Musgrave Development Company. It is square in form and laid on a poured concrete foundation. The primary façade faces north and is asymmetrical. It features medium-width extending eaves with exposed rafters found along the entirety of the façade. On the eastern side of the façade is an extending wing recessed from the primary façade wall where the front-facing windows are located (Figure 3.2-6). City directories, census lists, and voter registration revealed no information about past occupants of the residence. Newspaper archives and searches revealed no connection between the property or prior owners within the era of significance. Although the property falls within the boundaries of the Douglas Residential Historic District identified in 1996, its construction in 1960 is outside the period of significance (1900 to 1935) of the district. The cultural resources study also considered the residence as an individually eligible potential historic resource. Based on the architectural survey and background research, the cultural resources study concluded that the residence is recommended not eligible under any NRHP criteria (ASMA 2023).



Residence, 239 E. 1st Street



Commercial Building, 231 E. 1st Street



Commercial Building, 201 E. 1st Street



Building 1, Customs Avenue



Building 2, Customs Avenue



Building 3, Customs Avenue

**Figure 3.2-6. Images of Buildings in Alternative 3 Expansion Area**

**Commercial Building (231 E. 1<sup>st</sup> Street in Alternative 3 Expansion Area, parcel 409-09-003).** The property is occupied by a commercial building facing the street with an attached living area in the rear (Figure 3.2-6). It is horizontally massed, rectangular in form, and is laid on a poured concrete foundation. It features stucco exterior cladding, an asphalt-shingle, side-gable roof with an attic vent, two primary façade door entrances, and replaced windows. It exhibits no reference to any specific architectural style. The building was constructed in 1947. From at least 1961 until 1987 it was operated as a grocery store, called “Mi Tienda”. It was sold in 1987 and operated until 1990 as a shop called “Mario’s Mini-Store”. It later became an auto parts store and is currently in use as a business called “Sergio’s Shuttle Service”. The addition of residential space at the rear of the building is believed to have occurred in the 1970s. A separate residential building was constructed in 2000 on the property adjacent to the commercial building and described in city permits as a guest house. Because the commercial building is located within the Oro y Plata historic ethnic enclave, the cultural resources study considered the building as an eligible potential historic resource both within the historic enclave and individually. Based on the architectural survey and background research pertaining to Criteria A, B, C, and D, the cultural resources study concluded that the commercial building is recommended not eligible under any NRHP criteria (ASMA 2023).

**Commercial Building (201 E. 1<sup>st</sup> Street in Alternative 3 Expansion Area, parcel 409-09-002).** The property consists of a one-story commercial building with a north-facing primary façade (Figure 3.2-6). It is rectangular in form and laid on a poured concrete foundation. It features rough stucco and brick exterior cladding, and a low-rise, front-gabled, asphalt shingle roof. The main architectural feature to note along the primary façade of the building is its square-shaped, parapeted roof, hiding the actual gable of the building. Although visually it appears to connect to the building on its eastern side (203-205 E. 1<sup>st</sup> Street), there is a gap between the buildings and no interior connections. The building at 201 E. 1<sup>st</sup> Street was constructed in 1949 as a commercial building and was renovated in 1974 when the building directly to the east (203-205 E. 1<sup>st</sup> Street) and the warehouse directly to the south were constructed. The primary façade of 201 was likely altered at that time to visually connect the building aesthetically with 203-205. From at least 1960, the parcel was owned by an inspector for U.S. Customs, whose son, Ray Borane Jr., would become mayor of Douglas in 1995. The building operated in various capacities, including a mini mart, a secondhand store, a furnishing store, and an auto parts store. The building is presently no longer in use and is currently housing storage and various items of the owners of the property. The cultural resources study considered the building as an eligible potential historic resource both within the Douglas Historic District and individually. Based on the architectural survey and background research pertaining to Criteria A, B, C, and D, the cultural resources study concluded that the buildings are recommended not eligible under any NRHP criteria (ASMA 2023).

**3 Commercial Buildings (Customs Avenue in Alternative 3 Expansion Area, parcel 409-09-001B).** This property consists of three commercial buildings older than 50 years old.

Building one is a one-story commercial building with west-facing façade, constructed without reference to a specific architectural style. It is rectangular in form and laid on a poured concrete foundation. It features brick stucco exterior cladding and a low-rise, side-gabled, asphalt-shingled roof. Along its symmetrical, street-facing façade are a series of doors and windows. It was constructed in 1960 as a commercial building and operated as a bar and café. By the 1980s, it hosted an auto parts store. Ray Borane, Sr. was listed as the owner in 1969 and remained the owner until at least 1984. In 1974, when Mr. Borane made improvements to the majority of the buildings under his ownership in this area, a utility storage addition was constructed in the rear of the building. The building is now vacant and in a deteriorating condition.

The second building is a prefabricated one-story commercial building with a west-facing primary façade, constructed without reference to a specific architectural style. It is square in form and was constructed on a poured concrete foundation. It features vertically oriented corrugated metal exterior cladding, and a low-rise, side-gable roof with metal sheeting. Along its street-facing primary façade are a series of windows and a single door. It was constructed in 1968 as a commercial building. By the 1980s, ownership of the property was taken over by Ray Borane, Sr. who owned the majority of parcels in the immediate vicinity of the

building. By 2010, the building was described as a storage building and no longer operated in a commercial capacity.

Building three is a one-story commercial building located in the far northeast corner of the parcel with a façade facing south. It was constructed in 1942. Available records from the Cochise County Assessor's Office reveal that the building once had a concrete foundation, wood floor, and asbestos siding. It has been described variously as a utility building, a storage building, and a shed. In 1969, it was referred to as the "shed" building. The building is currently in deteriorating condition with a collapsed roof, and it is surrounded by refuse and overgrown vegetation, limiting views of the building. As a result, no determination of style was made.

Based on the architectural survey and background research pertaining to Criteria A, B, C, and D, the cultural resources study concluded that the buildings are recommended not eligible under any NRHP criteria (ASMA 2023).

## **3.2.2 Environmental Consequences**

### **3.2.2.1 Methodology**

Per NEPA, the significance of an environmental impact considers both context and intensity. Context is the geographic, biophysical, and society within which project effects will occur. Intensity refers to the severity of the impact within that context. Impacts or effects can be direct or indirect and beneficial or adverse (40 CFR 1508.8).

Per NHPA and 36 CFR 800 of its implementing regulations, adverse effects to historic properties occur when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the NRHP.

Adverse effects on historic properties include, but not limited to:

- (i) Physical destruction of or damage to all or part of the property;
- (ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's *Standards for the Treatment of Historic Properties* (36 CFR 68) and applicable guidelines;
- (iii) Removal of the property from its historic location;
- (iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- (v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;
- (vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- (vii) Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

For purposes of distinguishing between effects under NEPA and NHPA, references to “impacts” and “architectural cultural resources” in Sections 3.2.2.4 through 3.2.2.6 refer to effects under NEPA; references to “effects” and “architectural historic properties” refer to effects under the NHPA.

### **3.2.2.2 Section 106 Consultation**

GSA is in the process of conducting formal consultation with the SHPO and consulting parties under Section 106 of the NHPA. GSA submitted results of the cultural resources study, which considered the Alternative 1 and 2 Expansion Areas on January 19, 2023. SHPO provided comments on February 21, 2023. SHPO concurred with GSA’s findings that the Pan American and Customs Avenues Public Park Bathroom Building and the Cattle Operation Building are ineligible for inclusion in the NRHP. SHPO did not concur with GSA’s conclusion that 100 Pan American Avenue is ineligible for inclusion in the NRHP (see Appendix B). As part of the revised cultural resources study, 100 Pan American was resurveyed in June 2023 and reevaluated the building’s eligibility for inclusion in the NRHP, and again concluded it was ineligible for reasons as described in Section 3.2.1.3. GSA will continue consultation with the SHPO and the consulting parties. Results of this consultation process, as well as any applicable mitigation measures, will be included in the Final EIS.

### **3.2.2.3 No Action Alternative**

Under the No Action Alternative, GSA would not construct a new Commercial LPOE or expand and modernize the RHC LPOE. GSA would retain the historic Main Building and Garage without alterations and would be responsible for continued stewardship of the structures’ exteriors. Therefore, there would be no adverse effects to historic properties under NHPA and no adverse impacts to cultural resources under NEPA.

### **3.2.2.4 Alternative 1 – Sequential Construction**

Alternative 1 could result in overall adverse effects under NHPA and direct, significant adverse impacts under NEPA to cultural resources if unanticipated discoveries are encountered during ground-disturbing activities at either the proposed Commercial LPOE or the RHC LPOE project sites. Alternative 1a would result in no adverse effects under NHPA to architectural historic properties and negligible adverse impacts under NEPA to architectural cultural resources. Alternatives 1b, 1c and 1d would result in adverse effects under NHPA to architectural historic properties and direct, minor to significant, adverse, and permanent impacts to architectural cultural resources under NEPA.

Operations of Alternative 1 would not result in adverse effects or significant impacts to cultural resources at either the proposed Commercial LPOE or RHC LPOE.

## **Construction**

### **Commercial LPOE**

Under Alternative 1, proposed construction activities would result in ground disturbance at the Commercial LPOE site, which is largely vacant and undeveloped. One newly discovered archaeological site was identified during the archaeological survey as previously discussed; however, based on findings from the cultural study, this site is recommended not eligible under any NRHP criteria (ASMA 2023). Potential direct adverse effects under NHPA and direct, significant, adverse impacts under NEPA to cultural resources could occur during construction if previously unknown archaeological resources are encountered. To reduce the risk of damage to known and unknown archaeological sites, GSA would implement 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. Implementation of these measures would mitigate any potential adverse effects under NHPA and would reduce impacts to less-than-significant under NEPA.

## **RHC LPOE**

Under Alternative 1, proposed construction activities would result in ground disturbance at the Alternative 1 Expansion Area (2.7 acres) and within the RHC LPOE footprint; these are highly developed areas, and no archaeological resources were identified during the archaeological survey previously discussed in Section 3.2.1.3. Regardless, the potential for adverse effects to previously unknown archaeological resources (i.e., unanticipated discoveries) would be similar to that described for the Commercial LPOE site; therefore, GSA would implement an archaeological monitoring plan, similar to that described for the Commercial LPOE site.

With respect to architectural properties, two buildings located within the Alternative 1 Expansion Area were identified in the cultural study as being more than 50 years old – a commercial store (at 100 Pan American Avenue) and a bathroom building (located in the city park at the corner of Pan American Avenue and Customs Avenue). In their February 21, 2023 letter, SHPO concurred with GSA’s finding that the bathroom building is not considered eligible for inclusion in the NRHP (see Appendix B). However, SHPO did not concur with GSA’s finding that the commercial store is not eligible for inclusion in the NRHP. Based on a revised cultural resources study, GSA again concluded that the commercial store is ineligible for the NRHP (ASMA 2023) and is continuing consultation with SHPO on this determination. If this building is determined not eligible, there would be no adverse effect to architectural historic properties under NHPA and no adverse impacts under NEPA to architectural cultural resources. If the buildings are ultimately determined eligible, there would be an adverse effect to architectural historic properties under NHPA and significant adverse impacts under NEPA to architectural cultural resources. GSA would continue consultation with SHPO to determine appropriate mitigation measures to reduce adverse effects and impacts to less-than-significant.

Historic properties located within the RHC LPOE (i.e., the historic Main Building and Garage) are discussed under the section Alternatives 1a – 1d: Reuse, Relocate, or Demolish Structures.

## **Operations**

During operations of the Commercial LPOE and RHC LPOE, there would be no additional subsurface disturbance, other than for occasional repair and maintenance activities, which would limit the potential to disturb or harm buried cultural resources. Therefore, no adverse effects under NHPA and less-than-significant impacts to cultural resources during the operational phase would be expected. Impact reduction measures would be implemented as necessary during maintenance activities, including inadvertent discovery procedures.

## **Alternatives 1a – 1d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 1a through 1d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.1.2.1. Under these sub-alternatives, GSA would manage the historic structures through one of the following means, pending the outcome of ongoing Section 106 consultation with the SHPO and consulting parties. The type and intensity of adverse effects and impacts to cultural resources would depend on the sub-alternative chosen:

- **Alternative 1a** would involve reusing the existing historic structures and mainly entail renovation work. This sub-alternative would involve maintaining the structural integrity and preserving the façade of the historic Main Building and Garage. Any remodeling or renovation work would be done in a manner that preserves the cultural and historic significance of these structures. Under this sub-alternative, rehabilitation of the historic properties would follow the Secretary of the Interior’s *Standards for the Treatment of Historic Properties* and GSA’s *Procedures for Historic Properties*. Therefore, no adverse effects under NHPA to architectural historic properties and direct, negligible, adverse impacts under NEPA to architectural cultural resources would be expected.



- **Alternative 1b** would involve the relocation of the historic structures and preparation and construction of a new foundation and new utility connections. Relocation would cause the historic Main Building and Garage to lose its integrity of location, setting, feeling, and association. As such, these structures would no longer be eligible for the NRHP and, therefore, would result in an adverse effect under NHPA to architectural historic properties and direct, significant, and permanent adverse impacts under NEPA to architectural cultural resources. Relocating these structures would most likely require lifting the whole structure intact and transporting it to a new location. Careful planning would be required to help facilitate transport of these structures and site preparation for both the old and new locations. Under this sub-alternative, relocation of the historic properties would follow the Secretary of the Interior's *Standards for the Treatment of Historic Properties*, GSA's *Procedures for Historic Properties*, and guidance on moving buildings from the NPS and American Association for State and Local History to ensure that the buildings and their character-defining features are minimally impacted before, during, and after the move. Consistent with the requirements under Section 106 of NHPA, GSA would be required to develop measures to avoid, minimize, or mitigate the adverse effect on these historic properties, which would result in less-than-significant impacts under NEPA and would resolve effects under NHPA. GSA is in the process of formal consultation with the SHPO and consulting parties to follow coordination procedures as required under Section 106 of the NHPA and would consult with the Arizona SHPO to develop an agreement document under this sub-alternative to reduce potential adverse cultural resources impacts.
- **Alternative 1c** would involve the demolition of the historic Main Building and Garage. This sub-alternative would result in loss of NRHP eligibility for the RHC LPOE's historic properties. Under this sub-alternative, demolition of the historic Main Building and Garage would not follow the Secretary of the Interior's *Standards for the Treatment of Historic Properties*. Therefore, an adverse effect under NHPA to architectural historic properties and direct, significant, adverse, and permanent impacts under NEPA on architectural cultural resources would occur. Consistent with the requirements under Section 106 of NHPA, GSA would be required to develop measures to avoid, minimize, or mitigate the adverse effect on these historic properties, which would result in less-than-significant impacts under NEPA and would resolve effects under NHPA. GSA is in the process of formal consultation with the SHPO and consulting parties to follow coordination procedures as required under Section 106 of the NHPA and would consult with the Arizona SHPO to develop an agreement document under this sub-alternative to reduce potential adverse cultural resources impacts.
- **Alternative 1d** would involve a combination of Alternatives 1a through 1c. The type and extent of adverse impacts depends on the combination of sub-alternatives chosen to manage the historic Main Building and Garage. Partial demolition of one or both of the historic buildings and/or full demolition of one of the historic buildings could occur. Under this sub-alternative, any demolition of historic properties would not follow the Secretary of the Interior's *Standards for the Treatment of Historic Properties*, resulting in the loss of NRHP eligibility. Therefore, adverse effects under NHPA to architectural historic properties and direct, minor to significant, adverse, and permanent impacts under NEPA on architectural cultural resources would occur. Consistent with the requirements under Section 106 of NHPA, GSA would be required to develop measures to avoid, minimize, or mitigate adverse effects on these historic properties, which would result in less-than-significant impacts under NEPA and would resolve effects under NHPA. GSA is in the process of formal consultation with the SHPO and consulting parties to follow coordination procedures as required under Section 106 of the NHPA and would consult with the Arizona SHPO to develop an agreement document under this sub-alternative to reduce potential adverse cultural resources impacts.

### **3.2.2.5 Alternative 2 – Concurrent Construction (Westward Expansion)**

Alternative 2 could have adverse effects under NHPA and direct, significant adverse impacts under NEPA to cultural resources if unanticipated discoveries are encountered during ground-disturbing activities at either the proposed Commercial LPOE or the RHC LPOE project sites. Alternative 2a would result in no adverse effects under NHPA to architectural historic properties and negligible to minor adverse impacts under NEPA to architectural cultural resources; Alternatives 2b, 2c and 2d would result in adverse effects under NHPA to architectural historic properties and direct, minor to significant, adverse, and permanent impacts to architectural cultural resources under NEPA.

Operations for Alternative 2 would not result in adverse effects or significant impacts to cultural resources at either the proposed Commercial LPOE or RHC LPOE.

#### **Construction**

Under Alternative 2, effects and impacts to cultural resources during construction of the Commercial LPOE would be the same as those discussed under Alternative 1.

Under Alternative 2, construction at the RHC LPOE, including the Alternative 1 Expansion Area, would result in similar effects and impacts to archaeological resources as described under Alternative 1. However, the Alternative 2 Expansion Area encompasses a larger land area (an additional 13.9 acres) in addition to the Alternative 1 Expansion Area. This area, although mostly undeveloped and vacant, was heavily disturbed over time and no evidence of any original ground surfaces was observed during the archaeological survey. No archaeological resources were identified during the archaeological survey (ASMA 2023). GSA would implement similar impact reduction measures under Alternative 2 as described for Alternative 1.

With respect to architectural historic properties, construction at the RHC LPOE and Alternative 1 Expansion Area would have similar effects and impacts as described under Alternative 1. Additionally, a building located within the Alternative 2 Expansion Area just west of the RHC LPOE was identified in the cultural study as being more than 50 years old (referred to as the Cattle Operation Building in the cultural study). In their February 21, 2023 letter, SHPO concurred with GSA's finding that this building is not considered eligible for inclusion in the NRHP (see Appendix B). As such, there would be no adverse effect to architectural historic properties under NHPA and no adverse impacts under NEPA to architectural cultural resources with respect to the Cattle Operation Building.

#### **Operations**

Under Alternative 2, effects and impacts to cultural resources during operation of the Commercial LPOE and the RHC LPOE would be the same as those discussed under Alternative 1.

#### **Alternatives 2a – 2d: Reuse, Relocate, or Demolish Historic Structures**

Under Alternatives 2a through 2d, effects and impacts to the management of the historic properties at the RHC LPOE (i.e., the historic Main Building and Garage) would be the same as those discussed under Alternatives 1a through 1d.

### **3.2.2.6 Alternative 3 – Concurrent Construction (Eastward Expansion)**

Alternative 3 could have adverse effects under NHPA and direct, significant adverse impacts under NEPA to cultural resources if unanticipated discoveries are encountered during ground-disturbing activities at either the proposed Commercial LPOE or the RHC LPOE project sites. Alternative 3a would result in no adverse effects under NHPA to architectural historic properties and negligible to minor adverse impacts under NEPA to architectural cultural resources; Alternatives 3b, 3c, and 3d would result in adverse effects under NHPA to architectural historic properties and direct, minor to significant, adverse, and permanent impacts to architectural cultural resources under NEPA.

Operations for Alternative 3 would not result in adverse effects or significant impacts to cultural resources at either the proposed Commercial LPOE or RHC LPOE.

### **Construction**

Under Alternative 3, effects and impacts to cultural resources during construction of the Commercial LPOE would be the same as those discussed under Alternative 1.

Under Alternative 3, construction at the RHC LPOE, including the Alternative 1 Expansion Area, would result in similar effects and impacts to archaeological resources as described under Alternative 1. However, the Alternative 3 Expansion Area encompasses a larger land area (an additional 4.4 acres) in addition to Alternative 1 Expansion Area. This area has been developed with approximately 13 buildings and structures. Remaining open lands were heavily disturbed over time, and areas between buildings are overgrown with vegetation. No archaeological resources were identified during the archaeological survey (ASMA 2023). GSA would implement similar impact reduction measures under Alternative 3 as described for Alternative 1.

With respect to architectural historic properties, construction at the RHC LPOE and Alternative 1 Expansion Area would have similar effects and impacts as described under Alternative 1. Additionally, six buildings located within the Alternative 3 Expansion Area were identified in the cultural study as being more than 50 years old (ASMA 2023). GSA is recommending these buildings as not eligible under any NRHP criteria and is seeking concurrence with SHPO on this determination. If the buildings are determined not eligible, there would be no adverse effect to architectural historic properties under NHPA and no adverse impacts under NEPA to architectural cultural resources. If the buildings are ultimately determined eligible, there would be an adverse effect to architectural historic properties under NHPA and significant adverse impacts under NEPA to architectural cultural resources. GSA would continue consultation with SHPO to determine appropriate mitigation measures to reduce adverse effects and impacts to less-than-significant.

### **Operations**

Under Alternative 3, effects and impacts to cultural resources during operation of the Commercial LPOE and the RHC LPOE would be the same as those discussed under Alternative 1.

### **Alternatives 3a – 3d: Reuse, Relocate, or Demolish Historic Structures**

Under Alternatives 3a through 3d, effects and impacts to the management of the historic properties at the RHC LPOE (i.e., the historic Main Building and Garage) would be the same as those discussed under Alternatives 1a through 1d.

#### **3.2.2.7 Impact Reduction Measures**

To reduce the risk of damage to known and unknown archaeological sites, GSA would develop an archaeological monitoring plan in consultation with SHPO, ACHP, federally recognized Indian tribes, and other consulting parties.

GSA is in consultation with SHPO, ACHP, federally recognized Indian tribes, and other consulting parties and would identify and develop appropriate mitigation measures to avoid, minimize or mitigate adverse effects on historic properties prior to publication of the Final EIS. At a minimum, Historic American Buildings Survey documentation for the historic Main Building and Garage would be considered. Additional mitigation could include architectural artifact salvage. Appropriate mitigation would be determined in consultation between GSA, SHPO, and consulting parties.

### 3.3 AIR QUALITY AND GREENHOUSE GAS EMISSIONS

This section describes the baseline conditions for air quality and greenhouse gas (GHG) emissions within the region and assesses the potential for local and regional air quality or climate change to affect, or be affected by, implementing the Proposed Action, including the alternatives as discussed in Chapter 2.

Air quality is the measure of the atmospheric concentration of defined pollutants in a specific area. An air pollutant is any substance in the air that can cause harm to humans or the environment. Pollutants may be natural or human-made and may take the form of solid particles, liquid droplets, or gases. Natural sources of air pollution include smoke from wildfires, dust, and wind erosion. Human-made sources of air pollution include emissions from vehicles; dust from unpaved roads, agriculture, or construction sites; and smoke from human-caused fires. Air quality is affected by pollutant emission sources, as well as the movement of pollutants in the air via wind and other weather patterns.

GHG emissions released into the atmosphere as a result of human-induced fossil fuel combustion are widely believed to be contributing to changes in global climate. GHGs, which include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), water vapor, and several trace gases, trap radiant heat reflected from the Earth in the atmosphere, causing the Earth's average surface temperature to rise. The predominant GHGs are CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. In the U.S., anthropogenic GHG emissions come primarily from burning fossil fuels. Although GHG levels have varied for millennia (along with corresponding variations in climate conditions), increases driven by human activity have contributed significantly to recent climatic changes.

#### 3.3.1 Affected Environment

##### 3.3.1.1 *Region of Influence*

**Air Quality.** Because air quality is measured and regulated on a regional level, the air quality analysis in this EIS utilizes air quality data from the Arizona Department of Environmental Quality (ADEQ). The Proposed Action would take place within Cochise County. For purposes of this analysis, and because air pollution dissipates throughout the atmosphere, the ROI for air quality is defined as Cochise County.

**Greenhouse Gases.** The ROI for GHGs differs from other resource areas considered in this EIS since the concerns about GHG emissions are primarily related to climate change, which is global and cumulative in nature. Therefore, the affected environment is discussed broadly using a global, national, and regional framework to provide context for the analysis of potential GHG impacts from the Proposed Action. Recent scientific evidence indicates a correlation between increasing global temperatures over the past century and the worldwide increase in anthropogenic (human) GHG emissions (IPCC 2018). Climate change associated with global warming is predicted to produce negative environmental, economic, and social consequences across the globe in the coming years.

##### 3.3.1.2 *Regulatory Setting and Requirements*

###### Air Quality

The Clean Air Act (CAA), as amended in 1990, mandates that states develop a State Implementation Plan that explains how the state will comply with the CAA and achieve and maintain attainment of the National Ambient Air Quality Standards (NAAQS). The Arizona State Implementation Plan was initially approved in 1972 and is revised as needed to comply with new federal or state requirements when new data improves modeling techniques, when a specific area's attainment status changes, or when an area fails to reach attainment (ADEQ 2022a). The Arizona State Implementation Plan applies to industrial sources, commercial facilities, and residential development activities. Regulation occurs primarily through a process of reviewing engineering documents and other technical information, applying emission standards and regulations in the issuance of permits, performing field inspections, and assisting industries in determining their compliance status.

ADEQ has the authority to issue permits for the construction and operation of new or modified stationary source air emissions in Arizona. ADEQ air permits are required for any facility that will emit or currently emits regulated pollutants and must comply with the following regulations of the CAA: New Source Review, Prevention of Significant Deterioration, Title V Permitting, National Emission Standards for Hazardous Air Pollutants, and New Source Performance Standards. These regulations typically apply to major sources, i.e., sources that have the potential to emit more than 100 tons per year of any criteria pollutant, more than 10 tons per year of any hazardous air pollutant, or more than 25 tons per year of all hazardous air pollutants combined.

There are also Arizona state regulations that could potentially apply to activities that could occur during construction. These regulations are outlined in Arizona Administrative Code Title 18, Chapter 2 and include the following:

- Emissions from Open Areas, Dry Washes, or Riverbeds (Title 18.2.604);
- Open Burning Permits (Title 18.2.602);
- Air Pollution from Motor Vehicle (Title 18.2.1001); and
- Classes of Air Permits for Construction Projects (Title 18.2.302).

### **Greenhouse Gases**

GHGs are regulated under the CAA, via regulations discussed above for air quality. New sources or modifications to existing sources that have the potential to increase GHG emissions by more than 100,000 tons CO<sub>2</sub> equivalent per year may be subject to New Source Review or Prevention of Significant Deterioration requirements, as well as Title V requirements for operational permits, provided they are also otherwise subject to these requirements. Additionally, the U.S. Environmental Protection Agency's (USEPA) Mandatory Greenhouse Gas Reporting Rule (40 CFR 98) requires sources in specific industrial sectors to report their GHG emissions, if they emit more than 25,000 metric tons CO<sub>2</sub> equivalent per year. The Proposed Action would not likely be subject to these permitting and reporting requirements.

Several Executive Orders (EO) also require federal agencies to estimate and report their GHG emissions and set goals to reducing these emissions. These EOs include:

- EO 13990, *Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis*
- EO 14008, *Tackling the Climate Crisis at Home and Abroad*
- EO 14030, *Climate-Related Financial Risk*

#### **3.3.1.3 Existing Conditions**

Due to the proximity of the proposed Commercial LPOE and the RHC LPOE and the physical nature of air quality, the ROI is defined as Cochise County. As such, this section discusses the general affected environment for Cochise County. Where there are differences between the sites requiring distinction between the two project areas, these are highlighted in the text as appropriate.

### **Air Quality**

USEPA Region 9 and the ADEQ regulate air quality in Arizona. The CAA (42 U.S.C. 7401-7671q), as amended, gives USEPA the responsibility to establish the primary and secondary NAAQS (40 CFR 50) that set acceptable concentration levels for six criteria pollutants, compounds that cause or contribute to air pollution and which could endanger public health and the environment. The six criteria pollutants are particulate matter (fine particulate matter [10 micrometers or smaller, PM<sub>10</sub>] and very fine particulate matter [2.5 micrometers or smaller, PM<sub>2.5</sub>]), sulfur dioxide (SO<sub>2</sub>), carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), ozone (O<sub>3</sub>), and lead. O<sub>3</sub> is a strong photochemical oxidant that is formed when nitric oxide reacts with

volatile organic compounds (VOCs) and oxygen in the presence of sunlight. O<sub>3</sub> is considered a secondary pollutant because it is not directly emitted from pollution sources but is formed in the ambient air.

Short-term standards (1-, 8-, and 24-hour periods) have been established for criteria pollutants that contribute to acute health effects, while long-term standards (annual averages) have been established for pollutants that contribute to chronic health effects. Areas that exceed the NAAQS are designated as nonattainment areas, and those in accordance with the standards are designated as attainment areas. Air quality control regions that have been redesignated from nonattainment to attainment are called maintenance areas.

USEPA has designated the Paul Spur/Douglas Planning Area, part of Cochise County, as a nonattainment area for PM<sub>10</sub> (USEPA 2022a). Additionally, Douglas is an USEPA-designated maintenance area for SO<sub>2</sub>. Because the Proposed Action would take place within in a nonattainment area, the General Conformity Rule requirements apply. The General Conformity Rule states that, if a project would result in a total net increase in direct and indirect emissions of nonattainment or maintenance pollutants that are less than the applicable *de minimis* (i.e., negligible) thresholds established in 40 CFR 93.153(b), detailed conformity analyses are not required pursuant to 40 CFR 93.153(c).

The USEPA and the ADEQ monitor levels of criteria pollutants at representative sites throughout the U.S. Within Cochise County, ambient air quality monitoring data are available for PM<sub>10</sub> and O<sub>3</sub>. Cochise County does not have a monitoring station for other criteria pollutants (USEPA 2022b). Therefore, PM<sub>2.5</sub>, CO, and NO<sub>2</sub> data were taken from monitoring stations located in Pima County and lead monitoring data were taken from Pinal County. Table 3.3-1 shows the NAAQS, monitored concentrations, and air monitor location for each criteria pollutant. As shown in Table 3.3-1, the Paul Spur/Douglas Planning Area met the PM<sub>10</sub> 24-hour standard in 2022. Figure 3.3-1 shows the location of the Proposed Action in relation to the Paul Spur/Douglas Planning Area.

**Table 3.3-1. Ambient Air Quality Standards and Measured Criteria Pollutant Concentrations**

Pollutant	Averaging Time	NAAQS	Monitoring Data (2022)	Monitor Location
CO	1-hour	35 ppm	1.4	Tucson, AZ (Pima County)
	8-hour	9 ppm	0.8	Tucson, AZ (Pima County)
NO <sub>2</sub>	1-hour	100 ppb	38	Tucson, AZ (Pima County)
	Annual arithmetic mean	53 ppb	8	Tucson, AZ (Pima County)
O <sub>3</sub>	8-hour	0.070 ppm	0.065	Chiricahua National Monument (Cochise County)
SO <sub>2</sub>	1-hour	75 ppb	3.5	Tucson, AZ (Pima County)
PM <sub>2.5</sub>	24-hour	35 µg/m <sup>3</sup>	28	Nogales, AZ (Santa Cruz County)
	Annual arithmetic mean	12 µg/m <sup>3</sup>	10	Nogales, AZ (Santa Cruz County)
PM <sub>10</sub>	24-hour	150 µg/m <sup>3</sup>	130	Douglas, AZ (Cochise County)
Pb <sup>2</sup>	3-month average	0.15 µg/m <sup>3</sup>	--	--

Source: USEPA 2022b; USEPA 2022c

µg = micrograms; CO = carbon monoxide; m<sup>3</sup> = cubic meter; NO<sub>2</sub> = nitrogen dioxide; O<sub>3</sub> = ozone; Pb = lead; PM<sub>2.5</sub> = particulate matter of diameter 2.5 microns or less; PM<sub>10</sub> = particulate matter of diameter 10 microns or less; ppb = parts per billion; SO<sub>2</sub> = sulfur trioxide

Notes: 1 – Only the primary NAAQS are listed.

2 – If multiple monitors are present in a county, the monitor with the highest recorded pollutant concentrations is listed.

3 – Lead is not considered further in this analysis because none of the project activities would generate lead emissions.

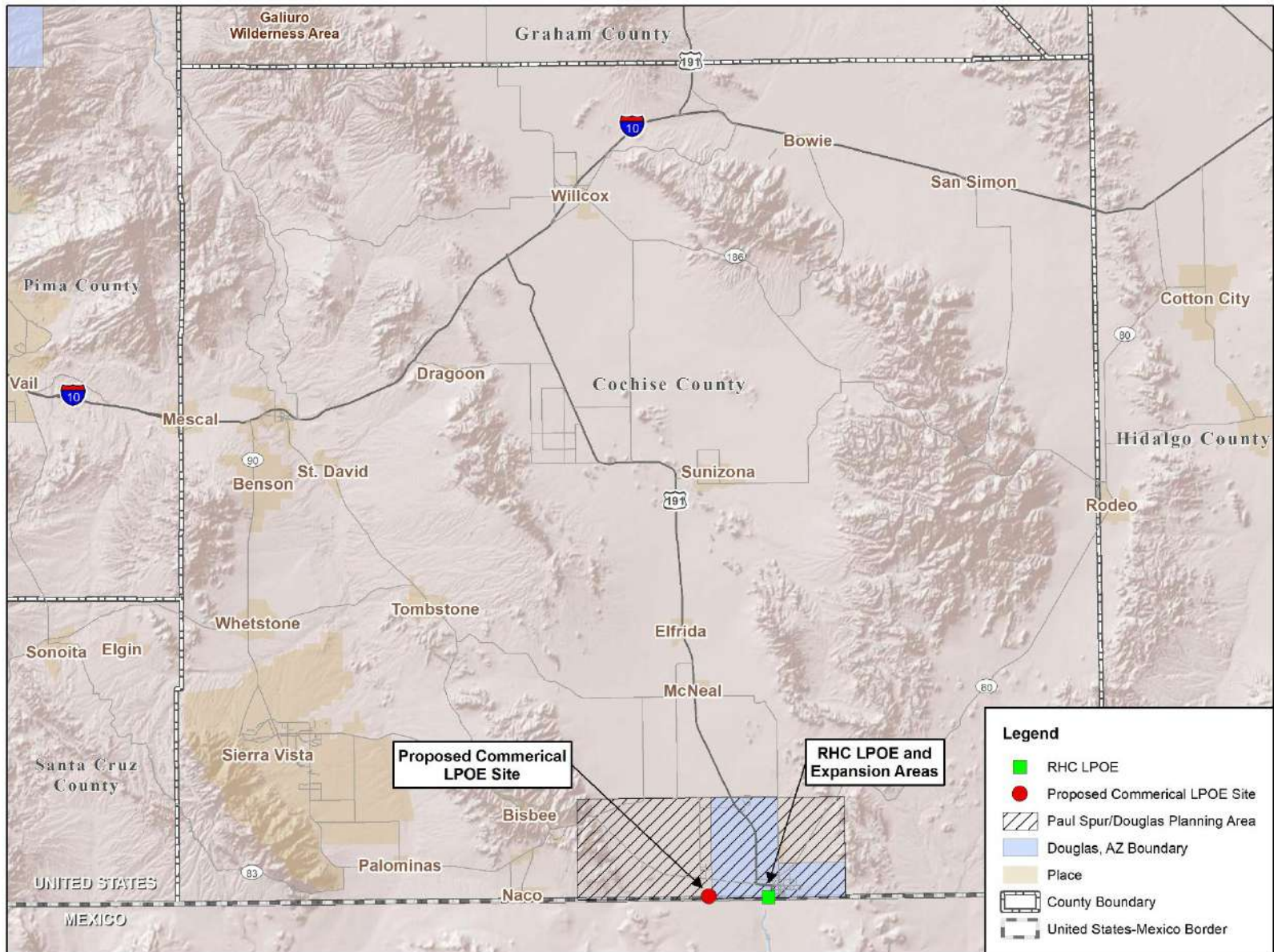


Figure 3.3-1. Location of the Proposed Action Relative to the Paul Spur/Douglas Planning Area

Populations that are more susceptible to the adverse effects of air pollution include children, elderly, and asthmatics. The locations where these sensitive receptors congregate are considered sensitive receptor location for air pollutants. As such, sensitive receptor locations for air impacts analyses typically include schools, daycares, hospitals, elderly housing and convalescent facilities. Sensitive receptor locations for air pollutants and their distance from the RHC LPOE are listed in Table 3.3-2.

**Table 3.3-2. Sensitive Receptor Locations for Air Pollutants Within 1 Mile of the RHC LPOE**

Receptor Type	Receptor	Direction from RHC LPOE	Distance (feet)
Hospital	Copper Queen Community Hospital Rural Health Clinic	North	1,100
Hospital	Copper Queen Community Hospital	Northwest	1,500
School	Center for Academic Success	Northeast	1,800
Preschool	Headstart Douglas	Northeast	1,900
School	Sara Marley Elementary School	Northeast	3,100
School	Center for Academic Success	Northeast	3,500
Hospital	Pima Heart	Northeast	4,000
Daycare	Coqui Children's Center	Northeast	4,100
Assisted Living Facility	Cypress Inn Assisted Living Facility	Northeast	4,500
School	Ray Borane Middle School	Northeast	4,800
School	Clawson Elementary School	Northeast	4,900
School	Center for Academic Success	Northeast	5,000

RHC LPOE = Raul Hector Castro Land Port of Entry

The proposed Commercial LPOE site is located within a largely undeveloped portion of Cochise County. No sensitive receptors were identified within one mile of the proposed Commercial LPOE site.

### **Greenhouse Gases and Climate Change**

GHGs are gases that trap heat in the atmosphere by absorbing outgoing infrared radiation (USEPA 2022d). GHG emissions occur from both natural processes as well as human activities. Water vapor is the most important and abundant GHG in the atmosphere; however, human activities produce only a small amount of the total atmospheric water vapor. The most common GHGs emitted from natural processes and human activities include CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O. The main source of GHGs from human activities is the combustion of fossil fuels such as oil, coal, and natural gas. Other examples of GHGs created and emitted primarily through human activities include fluorinated gases (e.g., perfluorocarbons) and sulfur hexafluoride. The main sources of these man-made GHGs are refrigerants and electrical transformers.

Numerous studies document the recent trend of rising atmospheric concentrations of CO<sub>2</sub>. The longest continuous record of atmospheric carbon dioxide monitoring extends back to 1958 (Keeling 1960; Scripps 2020). These data show that atmospheric CO<sub>2</sub> levels have risen an average of 1.5 parts per million (ppm) per year over the last 60 years, with the growth rate accelerating from around 1 ppm per year in the 1960s to 2 ppm per year in the 2000s (NOAA 2020). The global atmospheric CO<sub>2</sub> concentration has now passed 400 ppm, a level that last occurred about 3 million years ago when both global average temperature and sea level were significantly higher than today (USGCRP 2017). Rising atmospheric concentrations of CO<sub>2</sub> and other GHGs have been identified as the primary driver behind significant changes to global climate patterns. Observed changes to global climate include rising average temperatures, shrinking glaciers and sea ice, rising sea levels, increased drought and wildfires, increased flooding and other severe weather events, thawing permafrost, a lengthened growing season, and shifts in plant and animal ranges. International and national organizations independently confirm these findings and predict that these trends are likely to



continue into the foreseeable future unless action is taken to reduce global GHG emissions (IPCC 2018; USGCRP 2017).

Each GHG has been assigned a global warming potential (GWP) by the USEPA (USEPA 2022d). The GWP is the ability of a gas or aerosol to trap heat in the atmosphere. The GWP rating system is standardized to CO<sub>2</sub>, which is given a value of one. For example, CH<sub>4</sub> has a GWP of 25, which means that it has a global warming effect 25 times greater than CO<sub>2</sub> on an equal-mass basis. To simplify GHG analyses, total GHG emissions from a source are often expressed as a CO<sub>2</sub> equivalent, which is calculated by multiplying the emissions of each GHG by its GWP and adding the results together to produce a single, combined emission rate representing all GHGs. While CH<sub>4</sub> and N<sub>2</sub>O have much higher GWPs than CO<sub>2</sub>, CO<sub>2</sub> is emitted in such large quantities that it is the predominant contributor to global CO<sub>2</sub> equivalent emissions from both natural processes and human activities.

Increasing GHG concentrations in the atmosphere have been linked to a range of ongoing and potential changes to global climate including rising surface temperatures, changes in precipitation, rising sea levels and an increase in extreme weather events. However, these changes are not geographically uniform across the planet, and some regions are likely to experience greater change than others (IPCC 2018). Further, projections of future climate change are strongly related to predicted trends in GHG emissions, which in turn depend on policy and other actions to reduce GHG emissions.

The Southwest region of the U.S. has already experienced a number of climate change-related impacts and these trends are likely to continue in the foreseeable future, as described below (USGCRP 2018):

- Increased temperatures have significantly altered the water cycle in the Southwest region. These changes include decreases in snowpack and its water content, earlier peak of snow-fed streamflow, and increases in the proportion of rain to snow. These changes, attributed mainly to climate change, exacerbate conditions of drought. With continued GHG emissions, higher temperatures are likely to cause more frequent and severe droughts in the Southwest.
- Climate change has impacted ecosystems across the Southwest. In addition to rising temperatures and drought, wildfires have significantly expanded. Studies estimate that the area burned by wildfires between 1984 and 2015 nearly doubled because of climate change. Climate change is also leading to increase forest pest and disease infestations and geographic shifts in the historical ranges of several plant and animal species.
- Indigenous communities have been significantly impacted by climate change, including effects on the availability of traditional foods, natural resource-based livelihoods, and cultural resources. These impacts are being worsened by drought, wildfires, and other aspects of climate change.
- Rising temperatures and increasing drought are adversely affecting the ability to generate electricity from hydropower and fossil energy resources. Years of drought have lowered water levels in reservoirs used to generate hydroelectricity to historic lows. Fossil fuel power generation is also affected by climate change. These power plants are typically water-cooled, and their efficiency depends on ambient temperatures. Rising temperatures could reduce energy efficiency by up to 15 percent across the Southwest, while simultaneously increasing transmission losses. At the same time, water demand for power generation is projected to increase as temperatures rise, potentially conflicting with other demands for limited water resources.
- Food production across the Southwest is vulnerable to drought and rising temperatures. As surface water supplies decline, increased reliance on groundwater can lead to higher energy costs for pumping the water. Farmers may need to shift to more drought-tolerant crops and may experience reduced yields or quality in some cases. Higher winter temperatures also have the potential to adversely affect the cultivation of many fruits and nuts currently grown in the Southwest.

- Finally, climate change has the potential to adversely affect human health. Higher temperatures increase the risk of illnesses related to heat exposure, especially during episodes of extreme heat. Other environmental factors that contribute to adverse health outcomes, such as ground-level ozone, particulate pollution, airborne allergens, and decreasing water availability, are likely to be exacerbated by the higher temperatures and dry conditions projected to become more common in the future as a result of climate change.

### **3.3.2 Environmental Consequences**

#### **3.3.2.1 Methodology**

To evaluate air quality impacts and GHG emissions, GSA reviewed the project alternatives to determine whether any activities have the potential to cause the following:

- Increase in direct or indirect emissions from fixed and mobile sources such as stationary fuel combustion, construction equipment, and employee vehicles; or
- Increase in indirect offsite GHG emissions associated with electricity generation.

GSA also estimated the social cost of GHG (SC-GHG) associated with potential project emissions.

A significant adverse impact to air quality or GHG emissions would occur if the Proposed Action would result in:

- Result in emissions of criteria pollutants or HAPs that would exceed relevant air quality or health standards including the NAAQS;
- Violate any federal or state permits; or
- Conflict with local or regional air quality management plans to attain or maintain compliance with the federal and state air quality regulations.

When assessing significance, GSA also considered the potential for best management practice (BMP) to reduce the severity or extent of these impacts. Applicable BMPs are described below, and in Section 3.3.2.7.

#### **3.3.2.2 No Action Alternative**

Under the No Action Alternative, GSA would not construct a new Commercial LPOE or expand and modernize the RHC LPOE. Ongoing maintenance at the RHC LPOE would occur, which could generate minor, short-term air emissions depending on the activity. Inspection of COVs would remain at the RHC LPOE and elevated air emissions associated with COVs entering and exiting the port and traveling through the City of Douglas on Pan American Avenue would continue. The capacity and efficiency of operations at the RHC LPOE would degrade over time, resulting in longer delays and traffic congestion. POVs idling while awaiting inspection would continue to contribute to air emissions in the region.

#### **3.3.2.3 Alternative 1 – Sequential Construction**

Alternative 1 would have overall short-term, minor adverse impacts on air quality and GHGs during construction of the proposed Commercial LPOE and expansion of the RHC LPOE. Alternative 1 would have long-term, minor adverse and long-term, minor beneficial impacts on air quality and GHGs from operations of the proposed facilities.

### **Construction (Commercial and RHC LPOEs)**

#### ***Air Quality***

As explained in Section 3.3.1.3, the USEPA's General Conformity Rule under the CAA ensures that the actions taken by federal agencies do not interfere with a state's plans to attain and maintain the NAAQS (40 CFR 93.153(b)). Because the Proposed Action would be located within the Paul Spur/Douglas Planning

Area, a designated nonattainment area for PM<sub>10</sub> and a maintenance area for SO<sub>2</sub>, the General Conformity Rule requirements apply. Therefore, Alternative 1 is subject to review under the General Conformity Rule and a general conformity analysis is required (see Appendix C). For completeness, direct and indirect emissions of all applicable criteria pollutants (i.e., CO, VOCs [as a precursor for O<sub>3</sub>], NO<sub>2</sub>, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>) were estimated for the construction phase of Alternative 1. These estimated values were then compared to the General Conformity Rule’s *de minimis* emissions thresholds to determine whether implementation of Alternative 1 would impact air quality in the region.

Construction emissions were estimated for on-road vehicles and non-road construction equipment. Since a detailed construction plan has not yet been developed for the project, the number and types of construction equipment needed were estimated based on available data for other, similar projects, and in coordination with appropriate GSA staff. Emissions rates from on-road vehicles such as privately owned vehicles were estimated using industry standard emission rates (Argonne National Laboratory 2013). Emission rates for non-road vehicles such as excavators, cranes, graders, backhoes, and bulldozers were estimated using the USEPA’s MOVES (Motor Vehicle Emissions Simulator) model. Fugitive dust emissions factors for PM<sub>10</sub> and PM<sub>2.5</sub> were derived from USEPA’s AP-42.

For purposes of analysis and to provide a conservative estimate of potential air emissions, the following assumptions were made:

- During construction, all non-road equipment would be operated 8 hours per day. This leads to a conservatively high estimate, since in practice equipment would not be operated for eight hours each day.
- Fugitive dust emissions were primarily assumed to occur during demolition, grading, and site preparation activities.
- On-road vehicles would travel various distances. Worker vehicles were assumed to travel 20 miles per day, while vendor and waste trucks were assumed to travel 50 miles per day.

The results of the conformity analysis for construction of the Commercial LPOE and the expansion and modernization of the RHC LPOE are presented in Table 3.3-3 and Table 3.3-4, respectively. Air conformity analysis results for the Commercial LPOE and the RHC LPOE are presented separately because these activities would occur sequentially under Alternative 1. Full documentation of the methodology used to estimate the air emissions is presented in Appendix C.

**Table 3.3-3. Estimated Construction Air Emissions for the Commercial LPOE**

Source	Criteria Pollutant Emissions (tons)					
	CO	NO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOCs
Construction Equipment	0.80	1.45	0.11	0.11	0.00	0.14
Worker Vehicles	9.59	0.53	0.11	0.06	0.02	0.55
Delivery and Waste Trucks	6.30	6.20	0.65	0.33	0.05	0.48
Fugitive Dust			59.11	31.70		
<b>Total</b>	<b>16.69</b>	<b>8.18</b>	<b>59.98</b>	<b>32.20</b>	<b>0.06</b>	<b>1.18</b>
<i>De minimis Threshold</i>	100	100	100	70	100	10

Source: USEPA 2020e

Note: Individual numbers may not sum to totals due to rounding.

CO = carbon monoxide; NO<sub>2</sub> = nitrogen dioxide; PM<sub>2.5</sub> = particulate matter of diameter 2.5 microns or less; PM<sub>10</sub> = particulate matter of diameter 10 microns or less; SO<sub>2</sub> = sulfur dioxide; VOC = volatile organic compounds

**Table 3.3-4. Estimated Construction Air Emissions for RHC LPOE Expansion and Modernization**

Source	Criteria Pollutant Emissions (tons)					
	CO	NO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOCs
Construction Equipment	0.44	0.81	0.06	0.06	0.00	0.44
Worker Vehicles	7.99	0.44	0.09	0.05	0.01	7.99
Delivery and Waste Trucks	6.30	6.20	0.65	0.33	0.05	6.30
Fugitive Dust			12.00	6.44		
<b>Total</b>	<b>14.74</b>	<b>7.45</b>	<b>12.80</b>	<b>6.88</b>	<b>0.06</b>	<b>14.74</b>
<i>De minimis Threshold</i>	<i>100</i>	<i>100</i>	<i>100</i>	<i>70</i>	<i>100</i>	<i>10</i>

Source: USEPA 2020e

Note: Individual numbers may not sum to totals due to rounding.

CO = carbon monoxide; NO<sub>2</sub> = nitrogen dioxide; PM<sub>2.5</sub> = particulate matter of diameter 2.5 microns or less; PM<sub>10</sub> = particulate matter of diameter 10 microns or less; SO<sub>2</sub> = sulfur dioxide; VOC = volatile organic compounds

As shown in Tables 3.3-3 and 3.3-4, the total annual direct and indirect emissions associated with the construction of Alternative 1 would not exceed the *de minimis* threshold rate for any of the criteria pollutants analyzed per the thresholds identified in Section 3.3.1.3. Also note that the emissions presented in Table 3.3-3 would occur over the full 48- to 54-month construction period and emissions shown in Table 3.3-4 would occur over a 36- to 42-month period; emissions during any single year within the full Alternative 1 construction period would be lower. Therefore, further analysis under the General Conformity Rule is not required. In addition, the PM<sub>10</sub> emissions estimates presented in Table 3.3-4 assume uncontrolled emissions of fugitive dust; in practice, PM<sub>10</sub> emissions would likely be lower because GSA would take steps to minimize fugitive dust, as discussed in Section 3.3.2.7.

Overall, the construction/demolition activities would cause short-term, minor adverse impacts to air quality. Individuals living or working in close proximity to the Commercial LPOE or RHC LPOE sites would be most affected. These impacts would occur during the estimated 48 to 54 months of construction at the Commercial LPOE and 36 to 42 months at the RHC LPOE and would end once construction is completed.

Activities under Alternative 1 would comply with all applicable federal, state, and local regulations relating to air quality, including any permitting and registration requirements. Table 3.3-5 provides an overview of the applicability of the federal CAA air regulations to Alternative 1.

**Table 3.3-5. CAA Regulatory Review for Alternative 1**

CAA Regulation	Description of the Regulation	Applicability to Alternative 1
New Source Review	New Source Review permitting protects air quality when air emissions sources are built or modified.	If new emergency generators are installed under Alternative 1, they would need to undergo the New Source Review permitting process.
PSD	PSD applies to new major sources or modifications at existing sources of air pollutants where the area the source is located is in <i>attainment</i> or unclassifiable.	PSD review would be required if new emergency generators are installed under Alternative 1.
Title V permitting requirements	A Title V Permit requires sources of air pollutants to obtain and operate in compliance with an operating permit. A permit is required if a source has actual or potential emissions greater than or equal to 100 tons per year.	A Title V Permit would likely not be required because any new emergency generators installed under Alternative 1 would be below the 100 tons per year threshold.
NESHAP	NESHAP are stationary source standards for HAPs. HAPs are those pollutants that are known or suspected to cause cancer or other serious health effects.	The use of Maximum Available Control Technology would not be required because the potential HAP emissions would likely not exceed NESHAP thresholds under Alternative 1.
NSPS	NSPS are technology-based emission standards which apply to new, modified, and reconstructed facilities in specific source categories such as manufacturers of glass, cement, rubber tires, and wool fiberglass.	The project would be exempt from NSPS permitting requirements because Alternative 1 would not involve construction or operation of any of these types of facilities.

Source: USEPA 2020f

CAA = Clean Air Act; HAP = Hazardous Air Pollutants; NESHAP = National Emission Standards for Hazardous Air Pollutants; NSPS = New Source Performance Standards; PSD = Prevention of Significant Deterioration

### **Greenhouse Gas Emissions**

Alternative 1 would generate GHG emissions during construction activities, and would represent a negligible, incremental contribution to global GHG emissions and climate change. Short-term GHG emissions associated with Alternative 1 would primarily result from the use of fuel in construction equipment, worker vehicles, and delivery and refuse trucks. GHG emissions were estimated using USEPA emission factors (USEPA 2021) and are presented in Table 3.3-6. Even though Commercial LPOE and RHC LPOE construction would occur sequentially under this alternative, GHG emissions remain in the atmosphere for long periods of time and have a cumulative effect on climate change; therefore, these emissions are presented as totals under Alternative 1. Overall impacts from increased GHGs would be negligible.

In addition, GSA estimated annual SC-GHG (see Table 3.3-7) associated with the GHG emissions that could occur as a result of construction activities under Alternative 1. Estimates of SC-GHG provide an aggregated monetary measure (in U.S. dollars) of the net harm to society associated with an incremental metric ton of emissions in a given year. These estimates include, but are not limited to, climate change impacts associated with net agricultural productivity, human health effects, property damage from increased risk of natural disasters, disruption of energy systems, risk of conflict, environmental migration, and the value of ecosystem services. SC-GHG estimates can help the public and federal agencies understand or contextualize the potential impacts of GHG emissions and, along with information on other potential environmental impacts, can inform the comparison of alternatives. GSA followed the recommendations of the “Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide Interim Estimates under Executive Order 13990” released in February 2021 (IWG 2021) to estimate SC-GHG values.

**Table 3.3-6. Estimated Construction GHG Emissions under Alternative 1**

Source	GHG Emissions (metric tons)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> -eq
<b>Commercial LPOE</b>				
Construction Equipment	659.82	0.04	0.02	665.75
Worker Vehicles	953.12	0.04	0.01	957.37
Delivery and Waste Trucks	7,554.02	0.18	0.07	7,580.44
<b>Total - Commercial LPOE</b>	<b>9,166.96</b>	<b>0.26</b>	<b>0.10</b>	<b>9,203.56</b>
<b>RHC Expansion and Modernization</b>				
Construction Equipment	407.65	0.02	0.01	411.31
Worker Vehicles	794.27	0.04	0.01	798.52
Delivery and Waste Trucks	7,554.02	0.18	0.07	7,580.44
<b>Total - RHC LPOE</b>	<b>8,755.94</b>	<b>0.24</b>	<b>0.09</b>	<b>8,790.27</b>
<b>Total – Alternative 1</b>	<b>17,922.90</b>	<b>0.50</b>	<b>0.20</b>	<b>17,993.83</b>

CH<sub>4</sub> = methane, CO<sub>2</sub> = carbon dioxide; CO<sub>2</sub>-eq = carbon dioxide equivalent; N<sub>2</sub>O = nitrous oxide

**Table 3.3-7. SC-GHG (in \$) for Construction of Alternative 1, for Various Discount Rates**

Year	Discount Rate			
	3%	2.5%	5%	3% (95 <sup>th</sup> percentile)
2025	73,476	108,879	22,320	221,617
2026	143,081	210,817	42,705	434,069
2027	148,083	215,838	45,212	441,598
2028	150,610	218,364	45,217	451,628
2029	153,111	220,872	47,724	459,163
2030	155,638	223,392	47,730	469,193
2031	82,657	119,381	26,259	250,484

Note: Individual numbers may not sum to totals due to rounding. SC-GHG values (in \$) were calculated by multiplying annual emissions by the SC-GHG cost (\$/metric ton) provided in IWG (2021).

CH<sub>4</sub> = methane, CO<sub>2</sub> = carbon dioxide; CO<sub>2</sub>-eq = carbon dioxide equivalent; N<sub>2</sub>O = nitrous oxide

## **Operations (Commercial and RHC LPOEs)**

### ***Air Quality***

Even though the Commercial LPOE would begin operations before the expanded RHC LPOE, once the RHC LPOE is operational air emissions from both facilities would occur concurrently. Therefore, operational impacts to air quality are discussed together for the two facilities to present a conservative assessment of impacts.

Under Alternative 1, operations of the proposed Commercial LPOE and the expanded RHC LPOE would have a long-term, minor adverse impact on air quality. Direct (onsite) source of air emissions would include:

- Onsite emergency generators, which would likely be fired by diesel or natural gas. The RHC LPOE currently has two emergency generators onsite. Per the 2019 Feasibility Study, the proposed

Commercial LPOE would likely have one emergency generator for the Main Building, and a second emergency generator for the Commercial Inspection/Staging area (GSA 2019a). The expanded RHC LPOE would include an Emergency Generator Yard with likely two generators onsite to provide backup power. The increase in number of emergency generators across the two facilities under Alternative 1 would likely contribute to a negligible increase in air emissions, both during emergency situations as well as from periodic testing and maintenance.

- Boilers for building heat and domestic hot water, either oil or gas fired depending on final design. The new facilities taken together, including the Commercial LPOE and the expanded RHC LPOE, would consist of approximately 306,000 gross square feet of building space, which is considerably larger than the existing RHC LPOE. Therefore, fuel use and air emissions from onsite boilers would likely increase. However, GSA intends to design the new facilities to meet sustainable building standards including a minimum of LEED Gold; therefore, some of the increase in fuel use for heating would be offset by improved building efficiency. The LEED rating system allows for flexibility in how projects choose to meet the number of points required to obtain a given certification level. Therefore, the actual energy performance of the new building would likely not be known until building design is substantially completed.

Some air emissions associated with operations of the Commercial LPOE and the expanded RHC LPOE would occur offsite. Sources of indirect air emissions include:

- Offsite generation of electricity used at the Commercial LPOE and the expanded RHC LPOE, would likely be higher than the emissions associated with the existing RHC LPOE facility due to increased facility size. As discussed above, some of this increase would likely be offset by improved building efficiency. Further, GSA intends to design the building to be “net zero” ready. While renewable energy is not currently proposed at either facility, both facilities would be designed to accommodate future renewable energy projects with minimum changes to onsite infrastructure.
- Employee commuting would result in tailpipe emissions from employee POVs. GSA anticipates that approximately 150 additional employees may be needed to operate the Commercial LPOE and the expanded RHC LPOE. To present a conservative analysis in the event additional staff are hired, this analysis assumes up to 180 additional employees could be hired. Table 3.3-8 presents the estimated increase in air emissions that would occur as a result of employee commuting.

**Table 3.3-8. Estimated Annual Air Emissions from Employee Commuting**

Source	Criteria Pollutant Emissions (tons per year)					
	CO	NO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOCs
Commercial LPOE	6.65	0.37	0.07	0.04	0.01	0.38
RHC LPOE	5.12	0.28	0.06	0.03	0.01	0.29
<b>Total</b>	<b>11.77</b>	<b>0.65</b>	<b>0.13</b>	<b>0.08</b>	<b>0.02</b>	<b>0.68</b>

CO = carbon monoxide; NO<sub>2</sub> = nitrogen dioxide; PM<sub>2.5</sub> = particulate matter of diameter 2.5 microns or less; PM<sub>10</sub> = particulate matter of diameter 10 microns or less; SO<sub>2</sub> = sulfur dioxide; VOC = volatile organic compounds

Operations under Alternative 1 would also likely have some beneficial impacts on air quality from a reduction in the wait time for vehicles to be processed by a CBP officer. Table 2-2 shows current average and maximum vehicle wait times for POVs and COVs travelling inbound and outbound to the U.S., based on the 2018 baseline scenario. Currently, the highest wait times are for POVs traveling inbound to the U.S., which can be 34 minutes on average and as high as 52 minutes during peak times. The expanded RHC LPOE would be designed to reduce average wait times during peak hours to 30 minutes or less (Stantec 2018), which would lead to lower idling emissions from POVs. For purposes of analysis, an approximate 4-minute reduction in average vehicle wait times was used to calculate emission reductions. The estimated

reduction in idling emissions is presented in Table 3.3-9 and would more than offset any increase in emissions from employee commuting. Maximum vehicle wait time reductions could be much greater (as much as 22 minutes and 35 seconds) as shown in Table 2-2. Notably, COV inbound traffic wait times (currently 42 minutes and 49 seconds) are expected to improve substantially with establishment of a new Commercial LPOE. Therefore, emissions reductions could actually be greater in the long term.

**Table 3.3-9. Estimated Average Annual Reduction in POV Idling Air Emissions**

Source	Criteria Pollutant Emissions (tons per year)					
	CO	NO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOCs
Current Conditions (34 minutes average wait time) <sup>1</sup>	869.32	43.16	14.65	13.17	-	-
Alternative 1 (30 minutes or lower wait time) <sup>2</sup>	767.05	38.08	12.92	11.62	-	-
<b>Reduction in Idling Emissions</b>	<b>102.27</b>	<b>5.08</b>	<b>1.72</b>	<b>1.55</b>	<b>-</b>	<b>-</b>

1. Representative average wait time during peak traffic, for POVs traveling inbound to the U.S.

2. Port redesign goals at the RHC LPOE are to limit maximum wait times to 30 minutes or less.

Note: Emissions factors for SO<sub>2</sub> and VOCs were not available.

CO = carbon monoxide; NO<sub>2</sub> = nitrogen dioxide; PM<sub>2.5</sub> = particulate matter of diameter 2.5 microns or less; PM<sub>10</sub> = particulate matter of diameter 10 microns or less; SO<sub>2</sub> = sulfur dioxide; VOC = volatile organic compounds

In addition, routing truck traffic away from the city of Douglas would reduce air pollution exposure to city residents. Although overall emissions within the ROI would not change, there would be a minor benefit to air quality in the vicinity of the RHC LPOE. As shown in Table 3.3-2, there are several sensitive receptors located within 1 mile of the RHC LPOE, as compared to the Commercial LPOE which has no sensitive receptors located within a 1-mile radius.

There would be negligible impacts to air quality from operations of a new indoor small arms range to be constructed as part of the Commercial LPOE facility. CBP officials and others would be able to use the new range to complete required firearms qualifications. Many common munitions include lead rounds and lead primer; the firing of these munitions contributes to lead emissions. The indoor range would mitigate the environmental impacts of range operations; lead emissions would be captured by the indoor range's air filtration system instead of being directly vented to the atmosphere.

### **Greenhouse Gases**

Under Alternative 1, operations of the Commercial LPOE and the expanded RHC LPOE would have long-term, minor adverse impacts on GHG emissions. Similar to air emissions, onsite sources of GHGs include fuel use for building operations and emergency generators. Compared to the existing RHC LPOE, the new buildings would likely result in increased fossil fuel related GHG emissions due to their larger footprint. Additional sources of GHGs include fugitive leaks of refrigerants from cooling and refrigeration equipment. Because of their larger size, the new buildings would likely require a larger-sized cooling system; therefore, fugitive GHG emissions could increase.

Operations of the new building would also require more purchased electricity since there would be considerably more gross square feet of building space. Therefore, offsite GHG emissions are likely to increase compared to current conditions. GHG emissions would also likely increase as a result of employee commuting, due to an increase in the number of onsite personnel, as shown in Table 3.3-10. All of these increases would be offset to some extent by increased energy efficiency of the new facilities. Similar to air emissions, a decrease in POV idling times at the RHC LPOE would lead to a lowering of GHG emissions associated with Alternative 1 operations.



**Table 3.3-10. Estimated Annual GHG Emissions from Employee Commuting**

Source	GHG Emissions (metric tons per year)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> -eq
Commercial LPOE	660.83	0.03	0.01	663.78
RHC LPOE	508.33	0.03	0.01	511.28
<b>Total</b>	<b>1,169.16</b>	<b>0.05</b>	<b>0.02</b>	<b>1,175.05</b>

CH<sub>4</sub> = methane; CO<sub>2</sub> = carbon dioxide; CO<sub>2</sub>-eq = carbon dioxide equivalent; N<sub>2</sub>O = nitrous oxide

Table 3.3-11 presents annual SC-GHG values for Alternative 1 operations, for select years through 2050.

**Table 3.3-11. SC-GHG (in \$) for Operation of Alternative 1, for Various Discount Rates**

Year	Discount Rate			
	3%	2.5%	5%	3% (95 <sup>th</sup> percentile)
2035	6,693	9,588	2,202	20,551
2040	7,295	10,289	2,502	22,450
2045	7,895	10,990	2,805	24,151
2050	8,496	11,592	3,204	25,951

Note: Individual numbers may not sum to totals due to rounding. SC-GHG values (in \$) were calculated by multiplying annual emissions by the SC-GHG cost (\$/metric ton) provided in IWG (2021).

CH<sub>4</sub> = methane, CO<sub>2</sub> = carbon dioxide; CO<sub>2</sub>-eq = carbon dioxide equivalent; N<sub>2</sub>O = nitrous oxide

### **Alternatives 1a – 1d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 1a through 1d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.1.2.1. The potential impacts to air quality from each of these sub-alternatives would be similar and would not differ significantly from the impacts discussed above. The prior discussion of impacts includes air emissions and GHG emissions associated with demolition of existing structures at the RHC LPOE; impacts from the other sub-alternatives would likely be lower.

#### **3.3.2.4 Alternative 2 – Concurrent Construction (Westward Expansion)**

Alternative 2 would have overall short-term, minor adverse impacts on air quality and GHGs during construction of the proposed Commercial LPOE and expansion of the RHC LPOE. Alternative 2 would have long-term, minor adverse and long-term, minor beneficial impacts on air quality and GHGs from operations of the proposed facilities.

### **Construction (Commercial and RHC LPOEs)**

#### ***Air Quality***

Under Alternative 2, impacts from construction of the Commercial LPOE and expansion and modernization of the RHC LPOE would individually be similar to those discussed under Alternative 1. However, because construction activities would occur simultaneously, the overall period of impact would be shortened but air emissions during the period of construction would potentially be higher. Additionally, Alternative 2 would include a greater area of land disturbance within the Alternative 2 Expansion Area near the RHC LPOE. Table 3.3-12 summarizes potential impacts to air quality from construction activities under Alternative 2.

**Table 3.3-12. Estimated Construction Air Emissions under Alternative 2**

Source	Criteria Pollutant Emissions (tons)					
	CO	NO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOCs
Commercial LPOE	16.69	8.18	59.98	32.20	0.06	1.18
RHC LPOE	14.74	7.45	12.80	6.88	0.06	14.74
<b>Total</b>	<b>31.43</b>	<b>15.63</b>	<b>72.78</b>	<b>39.09</b>	<b>0.13</b>	<b>1.17</b>
<i>De minimis Threshold</i>	100	100	100	70	100	10

Source: USEPA 2020e

CO = carbon monoxide; NO<sub>2</sub> = nitrogen dioxide; PM<sub>2.5</sub> = particulate matter of diameter 2.5 microns or less; PM<sub>10</sub> = particulate matter of diameter 10 microns or less; SO<sub>2</sub> = sulfur dioxide; VOC = volatile organic compounds

As shown in Table 3.3-12, the total annual direct and indirect emissions associated with the construction of Alternative 2 would not exceed the *de minimis* threshold rate for any of the criteria pollutants analyzed per the thresholds identified in Section 3.3.1.3. Also note that the emissions presented in Table 3.3-12 would occur over the full 48- to 54-month construction period; emissions during any single year within the construction period would be lower. Therefore, further analysis under the General Conformity Rule is not required.

Overall, the construction and demolition activities would cause short-term, minor adverse impacts to air quality and could affect individuals living or working in close proximity to the Commercial LPOE and RHC LPOE. These impacts would end once construction is completed. In addition, the PM<sub>10</sub> emissions estimates presented in Table 3.3-12 assume uncontrolled emissions of fugitive dust; in practice, PM<sub>10</sub> emissions would likely be lower because GSA would take steps to minimize fugitive dust, as discussed in Section 3.3.2.7.

Activities under Alternative 2 would comply with all applicable federal, state, and local regulations relating to air quality, including any permitting and registration requirements. The applicability of federal CAA air regulations to Alternative 2 would be similar to that presented in Table 3.3-5 for Alternative 1.

### **Greenhouse Gases**

Alternative 2 would generate GHG emissions during construction activities, and would represent a negligible, incremental contribution to global GHG emissions and climate change. Short-term GHG emissions associated with construction activities under Alternative 2 would be similar to those under Alternative 1.

### **Operations (Commercial and RHC LPOEs)**

#### ***Air Quality***

Under Alternative 2, impacts to air quality during operations of the Commercial LPOE and the RHC LPOE would be the same as those discussed under Alternative 1.

#### ***Greenhouse Gases***

Under Alternative 2, GHG emissions during operations of the Commercial LPOE and the RHC LPOE would be the same as those discussed under Alternative 1.

### **Alternatives 2a – 2d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 2a through 2d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.1.2.1. The potential impacts to air quality from each of these sub-alternatives would be similar and would not differ significantly from the impacts discussed above. The prior discussion of impacts includes air emissions and GHG emissions associated with demolition of existing structures at the RHC LPOE; impacts from the other sub-alternatives would likely be lower.

### **3.3.2.5 Alternative 3 – Concurrent Construction (Eastward Expansion)**

Alternative 3 would have overall short-term, minor adverse impacts on air quality and GHGs during construction of the proposed Commercial LPOE and expansion of the RHC LPOE. Alternative 3 would have long-term, minor adverse and long-term, minor beneficial impacts on air quality and GHGs from operations of the proposed facilities.

#### **Construction (Commercial and RHC LPOEs)**

##### ***Air Quality***

Under Alternative 3, impacts from construction of the Commercial LPOE would be the same as described for Alternative 1, and impacts from expansion and modernization of the RHC LPOE would be comparable to those discussed under Alternative 2. Because the Alternative 3 Expansion Area contains existing buildings that would be demolished and require debris removal, there would be a slight increase in construction-related emissions attributable to those activities. However, Alternative 3 would have a smaller footprint for land disturbance in the expansion area than Alternative 2, which would cause a slight decrease in PM<sub>10</sub> emissions following demolition.

Otherwise, construction would be comparable for both Alternatives 2 and 3, which would result in conditions not substantially different than emissions parameters listed in Table 3.3-12 for Alternative 2. Even if emissions from construction for the RHC LPOE in Alternative 3 would be somewhat greater than the estimates for Alternative 2 in Table 3.3-12, the total annual direct and indirect emissions associated with the construction of Alternative 3 would not exceed the *de minimis* threshold rate for any of the criteria pollutants analyzed per the thresholds identified in Section 3.3.1.3. Also, as in the case of Alternative 2, the emissions presented in Table 3.3-12 would occur over the full 48- to 54-month construction period, and emissions during any single year within the construction period would be lower. Therefore, further analysis under the General Conformity Rule is not required.

Overall, the construction and demolition activities would cause short-term, minor adverse impacts to air quality and could affect individuals living or working in close proximity to the Commercial LPOE and RHC LPOE. These impacts would end once construction is completed. In addition, the PM<sub>10</sub> emissions estimates presented in Table 3.3-12 assume uncontrolled emissions of fugitive dust; in practice, PM<sub>10</sub> emissions would likely be lower because GSA would take steps to minimize fugitive dust, as discussed in Section 3.3.2.7.

Activities under Alternative 3 would comply with all applicable federal, state, and local regulations relating to air quality, including any permitting and registration requirements. The applicability of federal CAA air regulations to Alternative 3 would be similar to that presented in Table 3.3-5 for Alternative 1.

##### ***Greenhouse Gases***

Alternative 3 would generate GHG emissions during construction activities, and would represent a negligible, incremental contribution to global GHG emissions and climate change. Short-term GHG emissions associated with construction activities under Alternative 3 would be similar to those under Alternative 1.

#### **Operations (Commercial and RHC LPOEs)**

##### ***Air Quality***

Under Alternative 3, impacts to air quality during operations of the Commercial LPOE and the RHC LPOE would be the same as those discussed under Alternative 1.

##### ***Greenhouse Gases***

Under Alternative 3, GHG emissions during operations of the Commercial LPOE and the RHC LPOE would be the same as those discussed under Alternative 1.

### **Alternatives 3a – 3d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 3a through 3d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.1.2.1. The potential impacts to air quality from each of these sub-alternatives would be similar and would not differ significantly from the impacts discussed above. The prior discussion of impacts includes air emissions and GHG emissions associated with demolition of existing structures at the RHC LPOE; impacts from the other sub-alternatives would likely be lower.

#### **3.3.2.6 Impacts of Climate Change on the Proposed Action**

CEQ requires federal agencies to consider the potential impacts of climate change on proposed projects as part of NEPA analysis (CEQ 2016). Accordingly, this section discusses the potential for projected climate change impacts to affect Commercial LPOE and the expanded RHC LPOE operations over the next several decades. Section 3.3.1.3 discusses the potential impacts of climate change in the Southwest. Of those impacts, the ones that have a reasonably foreseeable potential to affect operations at the Commercial LPOE and the expanded RHC LPOE are discussed below in Table 3.3-13. Proposed mitigation measures to reduce these impacts are discussed under Section 3.3.2.7.

**Table 3.3-13. Potential Impacts of Climate Change on the Proposed Action**

<b>Climate Change Impact</b>	<b>Description of Impact</b>
Human Health and Safety	Climate change has the potential to adversely affect human health, through increased risk of exposure to extreme heat and by contributing to an increase in ground-level ozone, particulate pollution, airborne allergens. Personnel working at the Commercial LPOE and the RHC LPOE, as well as with individuals crossing the border, would be exposed to these conditions. Individuals crossing through the RHC LPOE on foot may be more exposed to higher temperatures and other adverse conditions, when compared to individuals inside vehicles and LPOE personnel working primarily within buildings.
Water Resources	Climate change is likely to lead to decreasing water availability and makes droughts more likely in the future. Drought conditions could affect the availability of water for personnel (domestic) uses and for building operations.
Energy	Rising temperatures and increasing drought are adversely affecting the ability to generate electricity from hydropower and decreasing the efficiency of fossil fuel energy generation.
Wildfires	Climate change has likely led to an increase in the area burned by wildfires in the Southwest, and this trend is projected to continue. However, the proposed facilities are located in areas that are currently rated either Low or Very Low for wildfire risk by the Arizona Department of Forestry and Fire Management.

Source: USGCRP 2018; Arizona Department of Forestry and Fire Management 2022

#### **3.3.2.7 Impact Reduction Measures**

##### ***Air Quality***

Construction activities at the proposed Commercial LPOE and RHC LPOE would generate fugitive dust (non-toxic particulate matter) emissions. Emissions from Open Areas, Dry Washes, or Riverbeds (Title 18.2.604) requires reasonable precautions to prevent PM from becoming airborne. Such precautions can include:

- using water for dust control when grading roads or clearing land
- applying water on dirt roads, materials stockpiles, and other surfaces that could create airborne dust
- paving roadways and maintaining them in a clean condition
- covering open equipment when conveying or transporting material likely to create objectionable air pollution when airborne, and

- promptly removing spilled or tracked dirt or other materials from paved streets.

Additional measures to control fugitive dust would include the following:

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate. This applies to both active and inactive sites during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

The following source-specific controls would be implemented to minimize emissions during construction activities:

- Reduce unnecessary idling from heavy equipment.
- Prohibit engine tampering to increase horsepower, except when meeting manufacturer's recommendations.
- Lease or buy newer, cleaner equipment using the best available emissions control technologies.
  - Use lower-emitting engines and fuels, including electric, liquified gas, hydrogen fuel cells, and/or alternative diesel formulations, if feasible.
  - On-Highway Vehicles - On-highway vehicles would meet, or exceed, the USEPA exhaust emissions standards for model year 2010 and newer heavy-duty on-highway compression-ignition engines (e.g., drayage trucks, long haul trucks, refuse haulers, shuttle buses, etc.).
  - Nonroad Vehicles & Equipment - Nonroad vehicles and equipment would meet, or exceed, the USEPA Tier 4 exhaust emissions standards for heavy-duty nonroad compression-ignition engines (e.g., nonroad trucks, construction equipment, cargo handlers, etc.).

Finally, the following administrative controls would be implemented during construction:

- Coordinate with appropriate air quality agencies to identify a construction schedule that minimizes cumulative impacts from other planned projects in the region, if feasible.
- Locate diesel engines, motors, and equipment staging areas as far as possible from residential areas and other sensitive receptors (e.g., schools, daycare centers, hospitals, senior centers, etc.).
- Avoid routing truck traffic near sensitive land uses to the fullest extent feasible.
- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking.
- Reduce construction-related trips of workers and equipment, including trucks.
- Develop a construction traffic and parking management plan that minimizes traffic interference and maintains traffic flow.

### **Greenhouse Gases**

Many of the mitigation measures for air quality identified above would also serve to reduce greenhouse gas emissions. GSA would take the following additional steps to minimize greenhouse gases:

- Design both the Commercial LPOE and the RHC LPOE to be energy-efficient facilities, including achieving a minimum of LEED Gold certification, which would reduce energy use and the associated greenhouse gas emissions.

- Construct both the Commercial LPOE and the expanded RHC LPOE to be net-zero ready, to accommodate future onsite renewable energy generation.
- Continue to evaluate options for on-site renewable energy generation (e.g., solar photovoltaic) for both the Commercial and the RHC LPOE, and install such systems if feasible and depending on funding availability.
- Use cement blended with the maximum feasible amount of fly ash or other materials that reduce GHG emissions from cement production.
- Recycle construction debris to the maximum extent feasible.

### **Climate Change Adaptation Measures**

To minimize impacts of climate change on human health and safety, GSA would:

- Incorporate shaded areas wherever possible, particularly along pedestrian routes through the RHC LPOE.
- Provide indoor cooling stations or waiting areas where pedestrians passing through the RHC LPOE can seek relief from heat and other adverse conditions such as poor air quality.
- Provide indoor areas where individuals can wait, if required, while they are being processed by CBP officials.
- Provide hydration stations that are readily accessible to pedestrians and individuals traveling in POVs and COVs, at both the Commercial and RHC LPOEs.
- Implement design strategies to reduce urban heat islands, including using lighter-colored pavement where feasible, planting trees, and maintaining green spaces with native vegetation.

To minimize impacts of climate change on energy resources, GSA would:

- Seek a minimum of LEED Gold certification for the proposed facilities, which would include energy conservation and efficiency measures.
- Implement measures to maximize energy efficiency where possible, such as through automated building controls and the use of energy-efficient equipment.
- Construct both the Commercial LPOE and the expanded RHC LPOE to be “net-zero” ready, to accommodate future onsite renewable energy generation.
- Evaluate options for on-site renewable energy generation (e.g., solar photovoltaic) for both the Commercial and the RHC LPOE, and install such systems if feasible and depending on funding availability.

To minimize impacts of climate change on water resources, GSA would seek a minimum of LEED Gold certification for the proposed facilities, which would incorporate water conservation and efficiency measures. GSA would implement measures to maximize water efficiency where possible, such as through xeriscaping and the use of water-efficient fixtures and appliances.

No specific mitigation measures are currently proposed to reduce potential wildfire impacts to the facility.

## 3.4 LAND USE AND VISUAL RESOURCES

This section describes the baseline conditions for land use and visual resources surrounding the project areas and assesses the potential for existing land use patterns and development trends within the project area to affect, or be affected by, implementing the Proposed Action, including the alternatives as discussed in Chapter 2. Land use is described by land activities, ownership, and the governing entities' management plans. Local zoning defines land use types and regulates development patterns. This section also describes the visual landscape within the project area ROI. Visual resources consist of all visible features – natural and man-made, moving, and stationary –that give a particular environment its aesthetic characteristics and can influence the visual appeal of that landscape for a viewer.

### 3.4.1 Affected Environment

#### 3.4.1.1 *Region of Influence*

The ROI for land use and visual resources focuses on the RHC LPOE, the proposed Commercial LPOE site, and adjacent areas surrounding both sites, including the Alternative 1, 2, and 3 Expansion Areas at the RHC LPOE.

#### 3.4.1.2 *Regulatory Setting and Requirements*

**City and County Zoning.** Arizona's state laws require that all cities prepare a General Plan, which is a document that provides a policy framework for land development and for the refinement of existing implementation tools such as zoning regulations (The Planning Center 2002). As such, the City of Douglas's *General Plan 2002* outlines the goals, objectives, and policies that pertain to land development and infrastructure projects in Douglas, including development projects at the existing RHC LPOE. The city's Planning and Zoning Division is responsible for implementing the *General Plan 2002*, zoning ordinances, and subdivision regulations.

Additionally, under Arizona law, counties are required to adopt a comprehensive plan that provides guidance for where and how development should occur. *The Cochise County Comprehensive Plan* and its accompanying land use map set forth policies that guide growth, including the protection of scenic viewsheds, outside of incorporated cities (Cochise County 2015) and, thus, pertains to the proposed Commercial LPOE site. The county's zoning regulations, subdivision regulations, light pollution code and building codes are the tools for implementation of the policies outlined in the comprehensive plan. The entire area of Cochise County, with the exception of incorporated cities, is divided into the following four categories of growth areas, based on each area's existing or foreseeable infrastructure, character and capacity for growth (Cochise County 2015):

- **Category A** – Urban Growth Areas: This category includes those areas adjacent to or surrounded by incorporated cities and having the necessary facilities and services to support it.
- **Category B** – Community Growth Areas: This category includes those areas adjacent to Category A Urban Growth Areas, as well as the larger unincorporated communities of the county, which are experiencing growth. These are areas in transition from a traditional rural environment to something more urbanized.
- **Category C** – Rural Community Areas: This category includes less populated rural communities that are characterized by a slow rate of growth and the desire to maintain the existing neighborhood or rural atmosphere.
- **Category D** – Rural Areas: This category includes the outlying rural areas between cities and unincorporated communities and characterized by a low rate of growth; unimproved roads; low density, large lot rural residential development; agricultural production; and large tracts of undeveloped private and public lands.

Within these four growth categories, there are seven potential plan designations. These designations more specifically identify the existing character of smaller areas within each growth area. The plan designations include: Neighborhood Conservation; Enterprise; Developing; Neighborhood Rehabilitation; Enterprise Redevelopment; Rural Residential; and Rural (Cochise County 2015).

**Clean Air Act.** In 1977, Congress amended the CAA to include provisions to protect the scenic vistas of Class I federal lands, including national parks, national wilderness areas, and national monuments. These areas are granted special air quality protections under Section 162(a) of the CAA (ADEQ 2022b) to protect visibility. As such, states are required to implement a regional haze plan to address visibility impairment resulting from manmade pollution, including vehicle emissions.

**National Scenic Byways Program.** The Federal National Scenic Byways Program establishes All-American Roads and National Scenic Byways. Additionally, Arizona enacted state laws to provide for the establishment of parkways and scenic roads. ADOT is the agency responsible to implement these laws. In Arizona, "scenic road" is a general term that is often used to identify state- and federally designated scenic roads (ADOT 2022a).

**GSA Facilities Standard.** GSA has a series of policy guides that address a variety of planning issues for federal facilities, including site security, site selection, project planning, and facility design standards. This includes GSA's mandatory facilities standard, *Public Building Service P100 Facility Standards* (P100 Standards), which applies to the design and construction of new federal facilities (as well as major repairs and alterations of existing buildings) (GSA 2021), the *Whole Building Design Guide* (GSA 2022a), and the LPOE Design Guide, which applies to LPOE design specifically. In addition, GSA has programs in place related to community planning to help create federal facilities that are consistent with good neighbor principles and that support positive community development and neighborhood urban design goals. Key principles of GSA's *Urban Development/Good Neighbor Program* (GSA 2020) include:

- Locate new owned and leased federal facilities in places that support public plans;
- Design new facilities to create outstanding federal workplaces and support neighborhood urban design goals;
- Renovate existing federal properties to improve their public spaces, create positive first impressions, and encourage stakeholders to improve neighborhood conditions;
- Manage federal properties to encourage public use and openness; and
- Participate in neighborhood physical and management improvement efforts around federal properties.

### 3.4.1.3 Existing Conditions

#### **Commercial LPOE**

The proposed Commercial LPOE site is owned by the City of Douglas and is located about 5 miles west of the RHC LPOE. The site consists of approximately 80.5 acres of undeveloped, vacant land with no paved access road or associated utility infrastructure (see Figure 2-2).

James Ranch Road is a dirt road that connects the site to SR-80, located approximately a mile north of the site. As shown in Figure 3.4-1, the site can be characterized as rural, desert land with clusters of desert vegetation. The surrounding areas also consist of a similar open, undeveloped landscape, although some buildings, structures, and debris exist on nearby parcels, and three residential properties are located approximately 2,500 feet (1 property) and 5,500 feet (two properties) to the north of the project area along James Ranch Road. The only major infrastructure in the area consists of a U.S. Border Patrol Station built in 2003, located approximately 1.5 miles northeast of the site.





**Figure 3.4-1. Site Photos of the Proposed Commercial LPOE Site**

With respect to the natural environment surrounding the City of Douglas and the proposed Commercial LPOE site, the region's semi-arid climate and mountainous vistas draw tourists and outdoor recreation enthusiasts to the region, especially during the winter season. Regional natural features include the neighboring mountains to the west (the Dragoon and Mule Mountains), to the east (the Chiricahua, Swisshelm, Pedrogosa, and Perilla Mountains), and to the southeast (the Sierra Madre Occidental in Mexico). Regional parks managed by federal or state entities near the proposed Commercial LPOE site include the Leslie Canyon National Wildlife Refuge (18 miles), San Bernardino National Wildlife Refuge (23 miles), Coronado National Memorial (35 miles), and Chiricahua National Monument (48 miles) (UA 2008).

Class I areas located within the county and protected by the Regional Haze Program include Chiricahua Wilderness and Chiricahua National Monument Wilderness Area, located 40 miles and 47 miles from the proposed Commercial LPOE site, respectively. There are no federally or state-designated scenic roads located in Cochise County (ADOT 2022).

In response to the proposed Commercial LPOE and RHC LPOE projects, Cochise County anticipates a potential increase in truck freight along US-191 and an opportunity to provide goods and services for an emerging international trading hub (Cochise County 2015). As such, the county has designated land use areas along SR-80 as a Category B Growth Area to help facilitate future development in anticipation of the LPOE projects.

In 2021, Cochise County and the City of Douglas entered into a Memorandum of Understanding (MOU) agreement that details the services and activities each entity will provide to support potential construction of a new Commercial LPOE (Cochise County and City of Douglas 2020). Under this MOU various roles and responsibilities are defined, including the analysis of infrastructure by Cochise County and updates to the city water and wastewater master plans and zone planning areas by the city.

In 2022, Cochise County amended the land use designation for the proposed Commercial LPOE site and surrounding 45 parcels in its comprehensive land map (Cochise County 2022a). The land use designations for these parcels were changed from Rural to Developing, Category B Community Growth Area (see Section 3.4.1.2 for designation descriptions). The project area and immediate parcels do not border any properties zoned for residences. The amended land use areas are shown in Figure 3.4-2. These amended areas extend east along SR-80, towards the City of Douglas. As detailed in the MOU, studies are currently underway to evaluate the improvements necessary to serve the SR-80 corridor for future development.

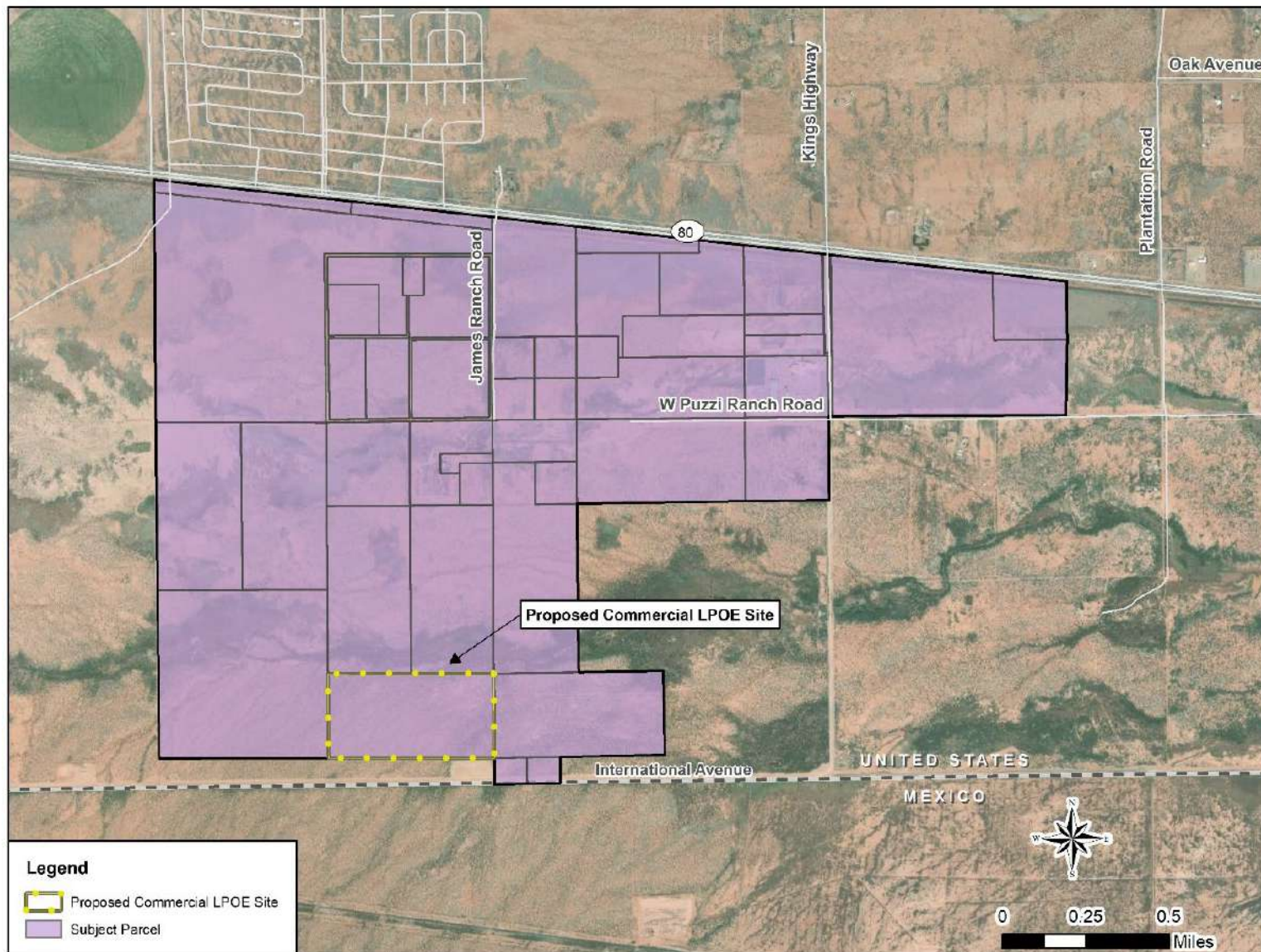


Figure 3.4-2. Land Use Amendment at the Proposed Commercial LPOE Site and Surrounding Areas

## **RHC LPOE**

The City of Douglas is located in Cochise County in southeastern Arizona on the U.S.-Mexico border. The City of Agua Prieta is located directly south of Douglas in the northeastern region of the state of Sonora, Mexico. The border crossing is in an urban setting near the downtowns of both cities. Due to the proximity of these sister cities, industrial development and population growth in Agua Prieta influences the economy of Douglas (USEPA 2001). Many of the manufacturing plants in Agua Prieta operate under the twin-plant (maquiladoras) concept in which Douglas serves as the warehouse distribution center and Agua Prieta the manufacturing epicenter (AZ Border Roadmap 2013). Agua Prieta has manufacturing plants with multiple warehouse operations in Douglas, some of them located just east of the RHC LPOE on 1<sup>st</sup> Street. The major regional and local roadways serving these ports include US-191, Pan American Avenue, and SR-80 for the RHC LPOE; and Federal Highway 2 and Federal Highway 17 in Mexico for the Agua Prieta LpOE.

The RHC LPOE is located at 1<sup>st</sup> Street and Pan American Avenue. Pan American Avenue is a major thoroughfare for the city as it connects the existing port to SR-80 and continues north as US-191. Pan American Avenue separates downtown Douglas from shopping and commercial complexes on the east side of the city. The city has expressed pedestrian safety concerns regarding the traffic on US-191. Downtown Douglas is located approximately eight city blocks north of the RHC LPOE.

The RHC LPOE is located on approximately 6 acres with facilities owned and managed by GSA and operated by CBP. The existing port is bounded by Customs Avenue to the east, 1<sup>st</sup> Street to the north, Pan American Avenue to the west, and the U.S.-Mexico border to the south. In 2019, the City of Douglas donated an approximately 1.5-acre lot for the RHC LPOE operations, and it has served as a parking area for port employees since. The RHC LPOE has been operating since 1914, while the construction of the current facility began in the 1930s, including the historic Main Building and Garage. As illustrated in Figure 1-3, the RHC LPOE consists of multiple buildings and structures and paved lots. The last facility renovations took place in 1993, which included construction of the commercial building and docks. Many of the facilities and structures are undersized, at the end of their functional lives, and no longer meet CBP's mission requirements. Figure 3.4-3 provides an aerial image of the existing port and adjacent areas (GSA 2019a).



**Figure 3.4-3. RHC LPOE – Aerial Image Looking South**

The visual landscape surrounding the northern and eastern borders of the RHC LPOE could be characterized as generally industrial or commercial. The property adjacent to the existing port's eastern boundary is occupied by commercial buildings, warehouses, and small storefronts, some of them vacant and/or for sale. An industrial and commercial park complex is located to the north and east of the port-owned parking lot. Though adjacent areas east of the RHC LPOE are zoned as commercial and industrial, there are a couple of residential properties located on 1<sup>st</sup> Street, less than 200 feet from the port's main facilities and directly across the port-owned parking lot. Warehouses are located along 1<sup>st</sup> Street that are accessed by trucks entering and exiting the RHC LPOE. Figures 3.4-4 and 3.4-5 illustrate the zoning map for the City of Douglas and a land ownership map for the RHC LPOE and adjacent properties, respectively.

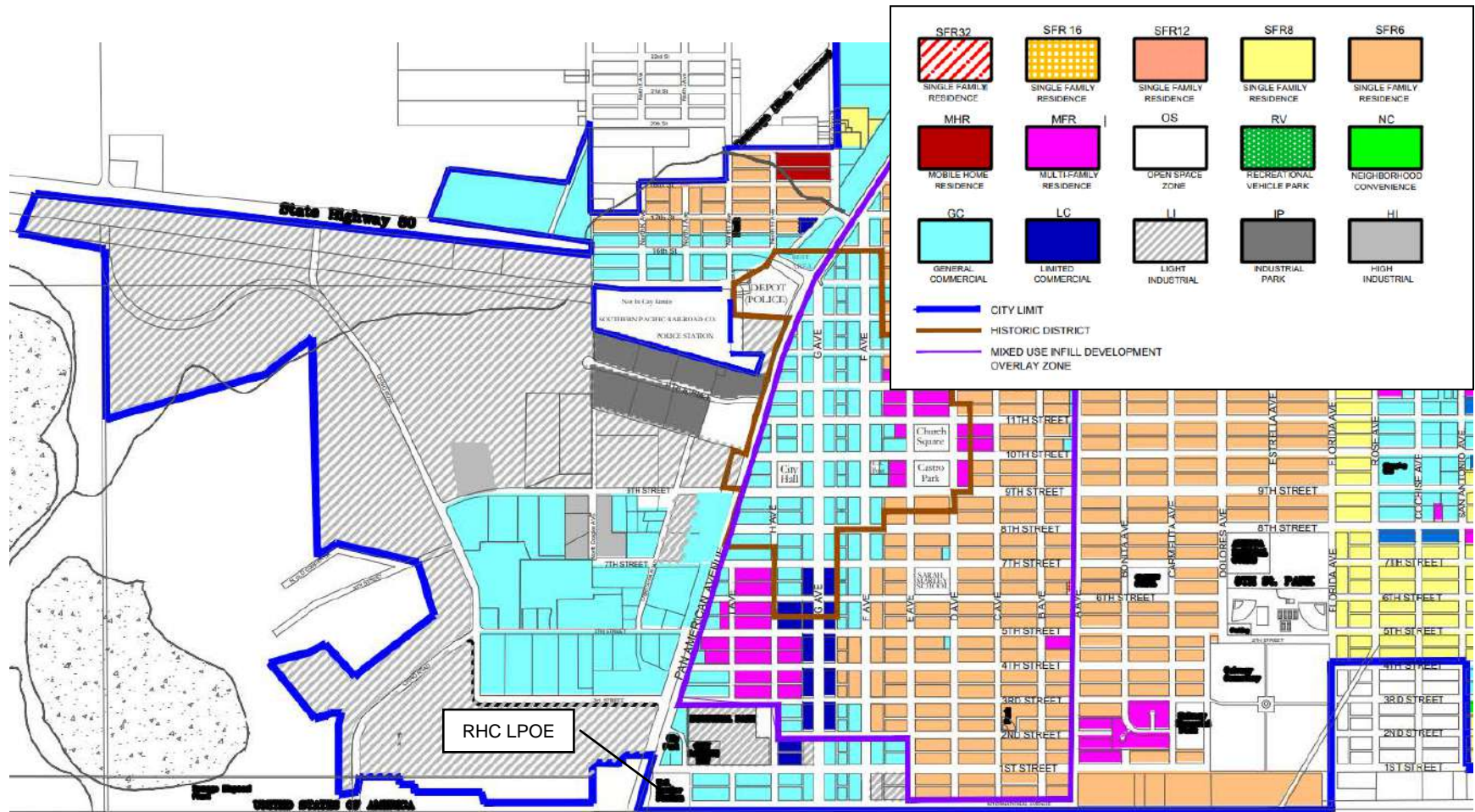


Figure 3.4-4. Zoning Map of City of Douglas

Source: Stantec 2020

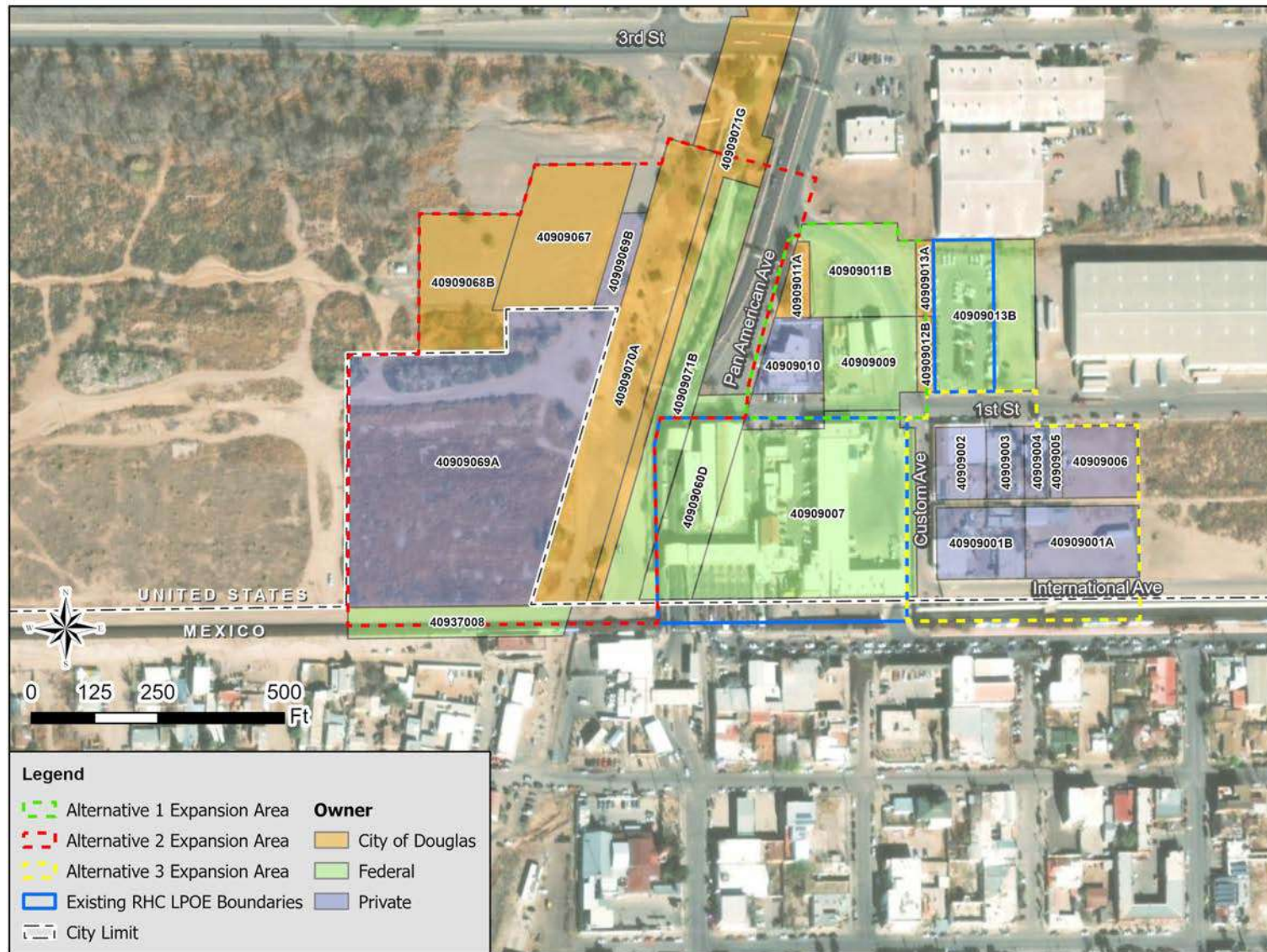


Figure 3.4-5. Land Ownership Map of RHC LPOE and Expansion Areas

Table 3.4-1 lists the parcels shown in Figure 3.4-5 and provides details on landowners and current land uses for each parcel.

**Table 3.4-1. Land Use and Ownership of Areas Surrounding the RHC LPOE**

Parcel Number <sup>a, b</sup>	Owner	Zoning	Current Land Use
40909007	Federal	N/A	RHC LPOE
40909060D	Federal	N/A	RHC LPOE
40909071B	Federal	N/A	RHC LPOE; portion of Pan American Avenue; stormwater drainage feature
40909013B	Federal	Light Industrial	Port-owned parking lot (donated by city); unpaved lot used by adjacent businesses
40909009	Federal	General Commercial	FMCSA facility; parking lot; stormwater drainage feature; Customs Avenue
40909011B	Federal	General Commercial	Paved lot; unpaved lot; stormwater drainage feature; portion of Customs Avenue
40909010	Private	General Commercial	Developed site, including shops and paved lot
40909011A	City of Douglas	General Commercial	City park (includes a washroom facility)
40909012B	City of Douglas	Light Industrial	Paved lot; portion of Customs Avenue; bus stop
40909013A	City of Douglas	Light Industrial	Paved lot; unpaved lot
40937008	Federal	N/A (not within city limits)	Unpaved road; vacant land
40909071G	City of Douglas	Light Industrial; portions not within city limits	Unpaved road/lot; park; paved sidewalk; landscaping; former site of railroad tracks; stream feature
40909070A	City of Douglas	Light Industrial; portions not within city limit	Unpaved road/lot; park; paved sidewalk; landscaping; former site of railroad tracks
40909069A	Private	N/A (not within city limits)	Vacant, unpaved roads, vegetation; former site of cattle pens
40909069B	Private	Light Industrial	Vacant, unpaved roads, vegetation; former site of cattle pens
40909067	City of Douglas	Light Industrial	Vacant, unpaved roads, vegetation; former site of APS manufactured gas plant
40909068B	City of Douglas	Light Industrial	Vacant, unpaved roads, vegetation; former site of APS manufactured gas plant
40909002	Private	General Commercial	3 inactive commercial concrete buildings; 1 inactive warehouse
40909003	Private	General Commercial	1 active commercial storefront; attached active residential property; 1 adjacent active residential building; open yard space
40909004	Private	General Commercial	1 active residential building; open yard space

Parcel Number <sup>a, b</sup>	Owner	Zoning	Current Land Use
40909005	Private	General Commercial	Inactive commercial building
40909006	Private	General Commercial	Undeveloped commercial lot with 2 shipping containers
40909001A	Private	General Commercial	Mainly open undeveloped lot; 1 warehouse and adjacent canopy
40909001B	Private	General Commercial	4 inactive commercial building structures; shared yard; 2 buildings intact; outdoor loading dock; 1 collapsed structure; 1 unkept structure.

Sources: GSA 2022b, GSA 2023a

APS = Arizona Public Service; BLM = Bureau of Land Management; FMCSA = Federal Motor Carrier Safety Administration; N/A = not applicable; RHC LPOE = Raul Hector Castro Land Port of Entry

<sup>a</sup> Refer to Figure 3.4-5 for parcel locations.

<sup>b</sup> Records for unmarked parcels are unavailable; these parcels are primarily roadways owned by either the City or State.

The Alternative 1 Expansion Area (see Figure 2-1) includes approximately 2.7 acres of land located directly north of the existing port which contains a FMCSA facility, a small park (with a washroom facility) and a cluster of small commercial businesses, including a duty-free store. The Alternative 1 Expansion Area also includes vacant land east of Customs Avenue and north of 1<sup>st</sup> Street adjacent to the port-owned parking lot and a bus stop on Customs Avenue. Lands in the Alternative 1 Expansion Area are zoned as General Commercial and Light Industrial.

The Alternative 2 Expansion Area (see Figure 2-1) located west of Pan American Avenue is mostly open, undeveloped land located directly west of the existing port. As shown in Figure 3.4-5 and described in Table 3.4-1, this area encompasses several parcels of various sizes and ownerships, and primarily includes unpaved areas, vegetation, piles of construction debris, paved sidewalks, a stream feature, and miscellaneous man-made structures, including a stormwater drainage feature. The Paseo de las Americas Linear Park is partially located within the Alternative 2 Expansion Area and provides a trail connection to the RHC LPOE that extends approximately a mile north, along Pan American Avenue. The expansion area also includes a parcel that previously was the site of a manufactured gas plant (MGP) from 1905 to 1947 and was recently remediated by APS in 2019 (see Section 3.13.1.3). One of the parcels was historically a cattle pen area but is now vacant. The areas west of Pan American Avenue within the Alternative 2 Expansion Area are mainly zoned as industrial. Alternative 2 also includes all of the Alternative 1 Expansion Area as described above. The Douglas Wastewater Treatment Plant (WWTP) and the former Phelps Dodge smelter site are located approximately 2,600 feet and 3,500 feet from the western edge of the Alternative 2 Expansion Area, respectively, and outside of the city limits.

The Alternative 3 Expansion Area (see Figure 2-1) includes seven parcels zoned General Commercial between 1<sup>st</sup> Street and International Avenue east of Customs Avenue. The commercial parcels are currently occupied by approximately 13 buildings. In total, these include one active commercial shuttle service; three occupied residential domiciles; and several commercial buildings, some of which are vacant, some being used for storage, and others in various stages of deterioration, as listed for parcels 40909002 through 40909001B in Table 3.4-1. The area includes paved surfaces and bare vacant land, all of which has been disturbed during prior uses. Alternative 3 also includes all of the Alternative 1 Expansion Area as described above.

GSA partnered with USEPA’s Office of Community Revitalization to provide planning assistance to the City of Douglas and technical support specifically in anticipation for the LPOE projects. This collaboration with the city led to the development of the *Douglas Infill and Downtown Revitalization Strategy*, a planning document that outlines the city’s strategies for leveraging the LPOE projects for economic development consistent with the city’s vision for future growth (City of Douglas et al. 2021).

## **3.4.2 Environmental Consequences**

### **3.4.2.1 Methodology**

To evaluate the impacts to land use and visual resources, GSA reviewed the project alternatives to determine whether any activities have the potential to cause the following within the ROI:

- Changes in land use and zoning;
- Changes in land ownership;
- Changes in public use of recreational areas or special interest areas;
- Changes in the scenic view or character of the landscape; or
- Changes in the amount of open space in an undeveloped area.

A significant adverse impact to land use would occur if the Proposed Action would result in:

- A conflict with land use or a land use restriction on adjacent properties, including the expansion areas for Alternatives 1, 2 and 3;
- Conflicts with regional or local land use plans and zoning;
- A major alteration of the aesthetic character and use of the land in relation to surrounding uses;
- Degradation of the visual appeal of an area, especially an area that most observers would consider a scenic view; or
- Elimination of a large area of undeveloped open space.

### **3.4.2.2 No Action Alternative**

Under the No Action Alternative, GSA would not construct a new Commercial LPOE or expand and modernize the RHC LPOE. Therefore, land acquisition would not be needed and the processing of COVs would be retained at the existing RHC LPOE. COVs would continue to drive through the city, which would inhibit land development that promotes safe pedestrian, bicycle, and automobile access in the city and would conflict with the city's long-term land use goals of revitalizing the city, especially its downtown district, thus, resulting in long-term, minor to moderate adverse impacts to land use throughout the city's urban center. Long-term, minor adverse impacts on visual resources would be expected as the existing buildings would continue to deteriorate and traffic congestion related to the RHC LPOE would continue to degrade the aesthetic quality of the city.

### **3.4.2.3 Alternative 1 – Sequential Construction**

Alternative 1 would have overall short-term, minor adverse impacts on land use during construction of the proposed Commercial LPOE and expansion of the RHC LPOE. There would be short-term, moderate adverse impacts to visual resources at the Commercial LPOE; and short-term, minor adverse impacts at the RHC LPOE during construction.

Operations of Alternative 1 would result in overall permanent, moderate beneficial impacts on land use at the proposed Commercial LPOE. Operational impacts at the RHC LPOE would range from long-term, minor to moderate, and adverse to permanent, moderate and beneficial at the RHC LPOE.

Operations of Alternative 1 would result in permanent, minor to moderate adverse impacts to visual resources at the proposed Commercial LPOE. There would be permanent, minor beneficial impacts to visual resources at the RHC LPOE.



## **Construction**

### **Commercial LPOE**

Under Alternative 1, the City of Douglas would donate the site for the proposed Commercial LPOE to GSA for development. As stated in Section 3.4.1.3, Cochise County amended the land use designation of the project area and surrounding properties from Rural to Developing, Category B, in preparation for this project. Therefore, no land use zoning conflicts would occur, and the Commercial LPOE would be consistent with Cochise County's and City of Douglas's land use plans.

Construction at the proposed Commercial LPOE site could cause temporary disturbances to adjacent land uses and users, such as from increased fugitive dust, traffic, or noise from construction activities (see Sections 3.3, Air Quality and Greenhouse Gas Emissions; 3.8, Transportation and Traffic; and 3.9, Noise). Construction is estimated to occur over a period of approximately 48 to 54 months. The closest residential properties are located approximately 2,500 feet (1 property) and 5,500 feet (two properties) to the north of the project area along James Ranch Road. Vehicles traveling and residences and local businesses located on SR-80, between James Ranch Road and US-191, could notice additional truck and commuter traffic along this corridor. The intensity of any adverse impact would depend on the extent and duration of the access limitation or extent of detour but would be expected to be intermittent and minor. Overall, adverse impacts to land uses would be short-term and minor.

Construction at the proposed Commercial LPOE site would result in a distinct visual contrast with its natural surroundings. The three residential properties located north of the project area on James Ranch Road would likely be able to detect construction activities and detect the additional construction-related traffic. The closest state and federal parks include Leslie Canyon National Wildlife Refuge (18 miles), San Bernardino National Wildlife Refuge (23 miles), Coronado National Memorial (35 miles), and Chiricahua National Monument (48 miles). Due to the flat topography of the area near the proposed Commercial LPOE site, visitors at these parks could potentially detect construction activities, depending on their viewpoint within the parks and visibility conditions. Adverse visual impacts are expected to be short-term and moderate during the construction phase.

### **RHC LPOE**

Under Alternative 1, existing buildings and structures at the RHC LPOE and the expansion area would be demolished and replaced with new buildings and structures. After the proposed Commercial LPOE opens and COV operations relocate to the new facility, construction at the RHC LPOE is estimated to occur over a period of approximately 36 to 42 months. Construction at the RHC LPOE could cause temporary disturbances to adjacent land uses and users, such as from increased fugitive dust, traffic, or noise from construction activities (see Sections 3.3, Air Quality and Greenhouse Gas Emissions; 3.8, Transportation and Traffic; and 3.9, Noise). Additionally, access to adjacent commercial businesses and warehouses on Pan American Avenue, Customs Avenue, and 1<sup>st</sup> Street could be impeded from construction activities and/or from traffic congestion related to the project. The intensity of any adverse impact would depend on the extent and duration of the access limitation or extent of potential traffic detours but is expected to be intermittent and minor.

Permanent closure of Customs Avenue between Pan American Avenue and 1<sup>st</sup> Street in the conceptual layout for the expanded RHC LPOE (see Figure 2-4) would require rerouting of vehicular access to the businesses on 1<sup>st</sup> Street via G and H Avenues. This would have a long-term, moderate, adverse impact for the businesses on 1<sup>st</sup> Street. The closure of this segment of Customs Avenue would also require the relocation of an existing bus stop. The impacts on traffic from this closure are discussed in Section 3.8.2.3. Otherwise, adverse impacts to adjacent land uses would be short-term and minor.

The properties to the north and east of the RHC LPOE and Alternative 1 Expansion Area have the features of typical commercial- and industrial-type facilities and, therefore, construction activities would not result in a substantial contrast to the surrounding viewshed. Users of the Paseo de las Americas Linear Park and

residences on 1<sup>st</sup> Street could notice adverse visual impacts from the visual contrast during construction. Adverse impacts to visual resources would be short-term and minor during construction at the RHC LPOE.

## **Operations**

### ***Commercial LPOE***

Operation of the Commercial LPOE would not result in any land use conflict because the land use designation of the surrounding region is the same as the Commercial LPOE site (i.e., Developing, Category B) and is in line with Cochise County's and City of Douglas's long-term goal of economic growth along SR-80, extending west from the city. The city and county envision this corridor becoming an industrial and commercial hub, filled with land uses that are more appropriate and function more efficiently outside of the city's downtown district (City of Douglas et al. 2021). The Commercial LPOE would also be consistent with the City of Douglas's long-term vision of revitalizing its downtown district and making the city more pedestrian- and biker-friendly. Development of the Commercial LPOE would result in permanent, moderate beneficial impacts to land use.

Operation of the proposed Commercial LPOE would result in a distinct visual contrast with its natural surroundings. The three residential properties located approximately 2,500 feet (1 property) and 5,500 feet (two properties) to the north of the proposed site would be able to detect the new facility and would detect the new traffic resulting from the COVs and commuter traffic from the CBP workers. This would result in a permanent, moderate adverse visual impact.

Although the site is relatively isolated, recreational users of regional federal and state parks could potentially detect the new facilities, especially during nighttime hours when exterior lighting at the LPOE would be more noticeable. The closest state and federal parks include Leslie Canyon National Wildlife Refuge (18 miles), San Bernardino National Wildlife Refuge (23 miles), Coronado National Memorial (35 miles), and Chiricahua National Monument (48 miles). Adverse visual impacts are expected to be permanent and minor during operation of the Commercial LPOE. Although the design of the Commercial LPOE is in its conceptual stage, outdoor lighting design would follow the LPOE Design Guide for federal inspection facilities. Outdoor lighting would conform to lighting requirements as stipulated in Cochise County's zoning regulations and light pollution code to the extent possible to minimize visual impacts.

### ***RHC LPOE***

Under Alternative 1, the replacement of the current buildings and structures would continue as the current land use at the RHC LPOE. The land use conversion of the 2.7-acre expansion area would represent a permanent loss of a city park and temporary absence of a duty-free shop (see Figure 2-1). This would result in long-term, minor adverse land use impacts in the city, as there are other park spaces throughout the city, including Paseo de las Americas Linear Park and the 3<sup>rd</sup> Street Park (including a public washroom facility), which are both located within 0.1 mile of the RHC LPOE. Further, it is anticipated that the duty-free shop would relocate elsewhere in the city. Development of the Alternative 1 Expansion Area would be consistent with the City of Douglas's long-term vision of revitalizing its downtown district.

The relocation of trucks to the proposed Commercial LPOE would potentially result in permanent, moderate beneficial impacts to land use as the removal of COVs traveling through the middle of the city would support the city's revitalization plans to make Douglas more pedestrian- and bike-friendly, and facilitate the city's objective to increase economic development and foot-traffic downtown.

The impacts from permanent closure of Customs Avenue between Pan American Avenue and 1<sup>st</sup> Street would be the same as described above for construction. The closure of this segment of Customs Avenue would also require the relocation of an existing bus stop.

Warehouses are located near the existing port that are sometimes accessed by COVs going to/from the port. It is possible that in the long term, owners of these warehouses may consider relocating as processing of COVs would move to the proposed Commercial LPOE. This could result in a long term, moderate, indirect

beneficial impact on the local land use as potential opportunities for a new warehouse district or repurposed facilities would be consistent with the City of Douglas's long-term vision of revitalizing its city.

At the RHC LPOE, new building and structure heights would not vary greatly from the current buildings, and the newly constructed buildings would be aligned with the general style of buildings in the immediate vicinity of the LPOE. Older buildings and structures would be replaced with new buildings and structures and, therefore, permanent, minor beneficial impacts on visual resources would be expected.

### **Alternatives 1a – 1d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 1a through 1d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.1.2.1. As these sub-alternatives would take place within the footprint of the RHC LPOE, the potential impacts to land use as already identified under Alternative 1 would not change. Negligible to moderate beneficial impacts to the viewshed may occur under these sub-alternatives, depending on the extent of any potential remodeling and renovation work for these historic structures. Warehouses could be re-purposed to align with the city's revitalization plans.

#### **3.4.2.4 Alternative 2 – Concurrent Construction (Westward Expansion)**

Alternative 2 would have overall short-term, minor adverse impacts on land use during construction of the proposed Commercial LPOE and expansion of the RHC LPOE. There would be short-term, moderate adverse impacts to visual resources at the Commercial LPOE; and short-term, minor adverse impacts to visual resources at the RHC LPOE during construction.

Operations of Alternative 2 would result in overall permanent, moderate beneficial impacts on land use at the proposed Commercial LPOE. Operational impacts at the RHC LPOE would range from long-term, minor to moderate, adverse to permanent, moderate, beneficial at the RHC LPOE.

Operations of Alternative 2 would result in permanent, minor to moderate adverse impacts to visual resources at the proposed Commercial LPOE. There would be permanent, minor beneficial impacts to visual resources at the RHC LPOE during operations.

### **Construction**

Under Alternative 2, impacts to land use and visual resources during construction of the Commercial LPOE would be the same as those discussed under Alternative 1.

Under Alternative 2, construction at the RHC LPOE and Alternative 1 Expansion Area would result in similar land use and visual impacts to those described under Alternative 1. However, Alternative 2 also includes the Alternative 2 Expansion Area which consists of undeveloped, open land area. The Alternative 2 Expansion Area represents the maximum build-out that GSA would consider. GSA may, instead, acquire temporary easements from the city for construction laydown areas. Following construction, land may be returned to the city or previous owner. Final plans for land acquisition would be determined during the design process for the RHC LPOE.

In addition to land uses adjacent to the Alternative 1 Expansion Area, the Alternative 2 Expansion Area's neighboring properties also include the shopping areas located on 3<sup>rd</sup> Street and Chiricahua Road. Access to these areas could be impeded from construction activities and/or from traffic congestion related to the project. The intensity of any adverse impact would depend on the extent and duration of the access limitation or extent of potential traffic detours but is expected to be intermittent and minor. Overall, the extent of impacts to land use and visual resources would be greater under Alternative 2 but is expected to be short-term, minor and adverse during construction.

### **Operations**

Under Alternative 2, impacts to land use and visual resources during operation of the Commercial LPOE would be the same as those discussed under Alternative 1.

Under Alternative 2, impacts to land use and visual resources during operations of the modernized RHC LPOE would be similar to those described under Alternative 1; however, because the Alternative 2 Expansion Area is greater than under Alternative 1, the extent of these impacts would be greater. The Alternative 2 Expansion Area to the west of Pan American Avenue would extend west and north to properties along 3<sup>rd</sup> Street and Chiricahua Road but would be consistent with the commercial and industrial land uses in this area.

In addition to the loss of the city park, a public washroom facility, and duty-free shop (also discussed in the Alternative 1 Expansion Area), there could potentially be the loss of trails of Paseo de las Americas Linear Park. Loss of park area in this western portion would be partially offset by development of the Alternative 2 Expansion Area to a beneficial use, as the area is largely underutilized and has been the site of illicit dumping of construction debris. This would result in net long-term, minor adverse land use impacts.

The relocation of trucks to the proposed Commercial LPOE would also occur under this alternative and permanent, moderate beneficial impacts from the removal of COVs would be expected as this would be consistent with the city's revitalization plans for the downtown district and to support the plan for a pedestrian-friendly community, similar as discussed under Alternative 1.

### **Alternatives 2a – 2d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 2a through 2d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.2.1. As these sub-alternatives would take place within the footprint of the RHC LPOE, the potential impacts to land use as already identified under Alternative 2 would not change. Negligible to moderate beneficial impacts to the viewshed may occur under these sub-alternatives, depending on the extent of any potential remodeling and renovation work for these historic structures.

#### **3.4.2.5 Alternative 3 – Concurrent Construction (Eastward Expansion)**

Alternative 3 would have overall short-term, minor adverse impacts on land use during construction of the proposed Commercial LPOE and permanent, minor to moderate, adverse impacts on land use in the Alternative 3 Expansion Area for the RHC LPOE. There would be short-term, moderate adverse impacts to visual resources at the Commercial LPOE; and short-term, minor adverse impacts to visual resources at the RHC LPOE during construction.

Operations of Alternative 3 would result in overall permanent, moderate beneficial impacts on land use at the proposed Commercial LPOE. Operational impacts at the RHC LPOE would range from long-term, minor, adverse to permanent, moderate, beneficial.

Operations of Alternative 3 would result in permanent, minor to moderate, adverse impacts to visual resources at the proposed Commercial LPOE. There would be permanent, minor beneficial impacts to visual resources at the RHC LPOE during operations.

### **Construction**

Under Alternative 3, impacts to land use and visual resources during construction of the Commercial LPOE would be the same as those discussed under Alternative 1.

Under Alternative 3, construction at the RHC LPOE and Alternative 1 Expansion Area would result in similar land use and visual impacts as those described under Alternative 1. However, Alternative 3 also includes the Alternative 3 Expansion Area which consists of developed land area zoned general commercial with 13 buildings that would require demolition and removal.

The Alternative 3 Expansion Area includes seven privately owned parcels zoned general commercial. The acquisition of these parcels would permanently displace one active business and three residential occupants and would eliminate various ongoing storage uses on the properties, which may affect other businesses. Final plans for land acquisition would be determined during the design process for the RHC LPOE.

In addition to land uses adjacent to the Alternative 1 Expansion Area, the Alternative 3 Expansion Area adjoins neighboring properties with commercial logistics businesses to the north along East 1<sup>st</sup> Street, including three large warehouse buildings used by medical products and machinery businesses. The parcels north of 1<sup>st</sup> Street are zoned light industrial. Access to these businesses could be temporarily impeded by construction activities and/or traffic congestion related to the project. The intensity of any adverse impact would depend on the extent and duration of the access limitation or extent of potential traffic detours and is expected to be minor to moderate. These businesses would also experience long-term, moderate, adverse impacts from permanent closure of Customs Avenue to Pan American Avenue as described for Alternative 1. Overall, the impacts to land use and visual resources would be greater than Alternatives 1 or 2 but are expected to be minor to moderate and adverse during construction.

### **Operations**

Under Alternative 3, impacts to land use and visual resources during operation of the Commercial LPOE would be the same as those discussed under Alternative 1.

Under Alternative 3, impacts to land use and visual resources during operations of the modernized RHC LPOE would be similar to those described under Alternative 1; however, because the Alternative 3 Expansion Area is greater than under Alternative 1, the extent of these impacts would be greater. The Alternative 3 Expansion Area to the east of Customs Avenue would extend along the south side of East 1<sup>st</sup> Street replacing mostly inactive commercial uses, an active business, and three residences; however, the expanded LPOE would be consistent with the commercial and industrial land uses in this area.

In addition to the loss of the city park, a public washroom facility, duty-free shop, and the permanent closure of Customs Avenue north of 1<sup>st</sup> Street (also discussed for the Alternative 1 Expansion Area), Alternative 3 would close Customs Avenue from 1<sup>st</sup> Street to International Avenue and close International Avenue east of Customs Avenue to the eastern boundary of the Alternative 3 Expansion Area. Customs Avenue would be incorporated into the expanded footprint of the RHC LPOE after acquisition of the Alternative 3 Expansion Area. The closure of International Avenue east of Customs Avenue would have a negligible to minor adverse impact after demolition of the businesses in the Alternative 3 Expansion Area and relocation of COVs to the Commercial LPOE.

The relocation of trucks to the proposed Commercial LPOE would also occur under this alternative, and permanent, moderate beneficial impacts from the removal of COVs would be expected as this would be consistent with the city's revitalization plans for the downtown district and to support the plan for a pedestrian-friendly community, similar as discussed under Alternative 1.

### **Alternatives 3a – 3d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 3a through 3d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.2.1. As these sub-alternatives would take place within the footprint of the RHC LPOE, the potential impacts to land use as already identified under Alternative 3 would not change. Negligible to moderate beneficial impacts to the viewshed may occur under these sub-alternatives, depending on the extent of any potential remodeling and renovation work for these historic structures.

#### **3.4.2.6 Impact Reduction Measures**

Measures to reduce construction impacts on land use-related concerns, such as fugitive dust, traffic, or noise from construction activities are discussed in Sections 3.3, Air Quality and Greenhouse Gas Emissions; 3.8, Transportation and Traffic; and 3.9, Noise, respectively.

Although local governments cannot regulate or permit activities of the federal government on federally owned land, GSA would consider local zoning laws for construction and operation of the new and modernized LPOEs and all design requirements of state and local governments to the extent practicable (GSA 2021). This would include both the incorporation of exterior design elements to reflect the unique

character of the area and the emphasis on pedestrian circulation and amenities, such as landscaped plazas and walkways, to the extent practicable and consistent with GSA design standards.

GSA would implement the following measures to minimize impacts to visual resources:

- Consult with local officials, consider local requirements for new building construction, and comply with state and local building codes to the maximum extent practicable.
- Integrate its programs of design/architecture and construction excellence into the new facility in order to optimize building performance and aesthetics, including adherence to P100 Standard which establishes design criteria and standards for new government buildings.
- Design exterior lighting to meet physical security requirements but controlled to minimize light trespass (e.g., direct light downward and minimize glare). Fixtures for the security fence would be a similar style. Exterior lighting would be consistent with the local ordinance code for outdoor lighting to the extent possible.
- Incorporate landscaping and screening (trees and vegetation) into the exterior design to provide aesthetic benefits to the surrounding community, consistent with GSA's *Urban Development/Good Neighbor Program*.

## **3.5 GEOLOGY AND SOILS**

This section describes the baseline conditions for geological resources in the project area and potential geological impacts that could result from implementing the Proposed Action, including the alternatives as discussed in Chapter 2. Geological resources consist of the Earth's surface and subsurface materials, and are typically described in terms of geology, topography, soils, and geologic hazards. Geology is the study of the Earth's physical structure and composition, as well as the configuration of the surface and subsurface features. Topography describes the general shape and arrangement of the natural and artificial physical features of a land surface. Soils are the unconsolidated material overlying bedrock, and are typically described in terms of type, slope, and physical characteristics such as permeability, strength, and erosion potential. Geologic hazards are natural geologic events that can endanger human lives and threaten property such as seismicity. The conditions described in the affected environment focus on geology, topography, and soils. Seismicity is not addressed in this section as the project area is not considered as high risk for seismic activity.

### **3.5.1 Affected Environment**

#### **3.5.1.1 *Region of Influence***

The ROI for geology and soils focuses on the RHC LPOE, the proposed Commercial LPOE site, and adjacent areas surrounding both sites, including the expansion areas for Alternatives 1, 2, and 3.

#### **3.5.1.2 *Regulatory Setting and Requirements***

Operators of construction sites disturbing one or more acres of land are required to obtain Arizona Pollutant Discharge Elimination System (AZPDES) permit coverage for stormwater discharges under a stormwater Construction General Permit (CGP). CGPs authorize stormwater discharges to protected surfaces of water associated with construction activities as defined in Appendix A of 40 CFR 122.26(b)(15)(ii). As of December 2005, the Arizona Department of Environmental Quality (ADEQ) is the authorized entity for administering the AZPDES program in Arizona. Under the CGP operators must implement a range of pollution prevention measures, erosion and sediments controls, and site stabilization controls to limit or prevent discharges of pollutants, including those from dry weather discharges as well as wet weather as described in 40 CFR 450.21 (ADEQ 2020).

#### **3.5.1.3 *Existing Conditions***

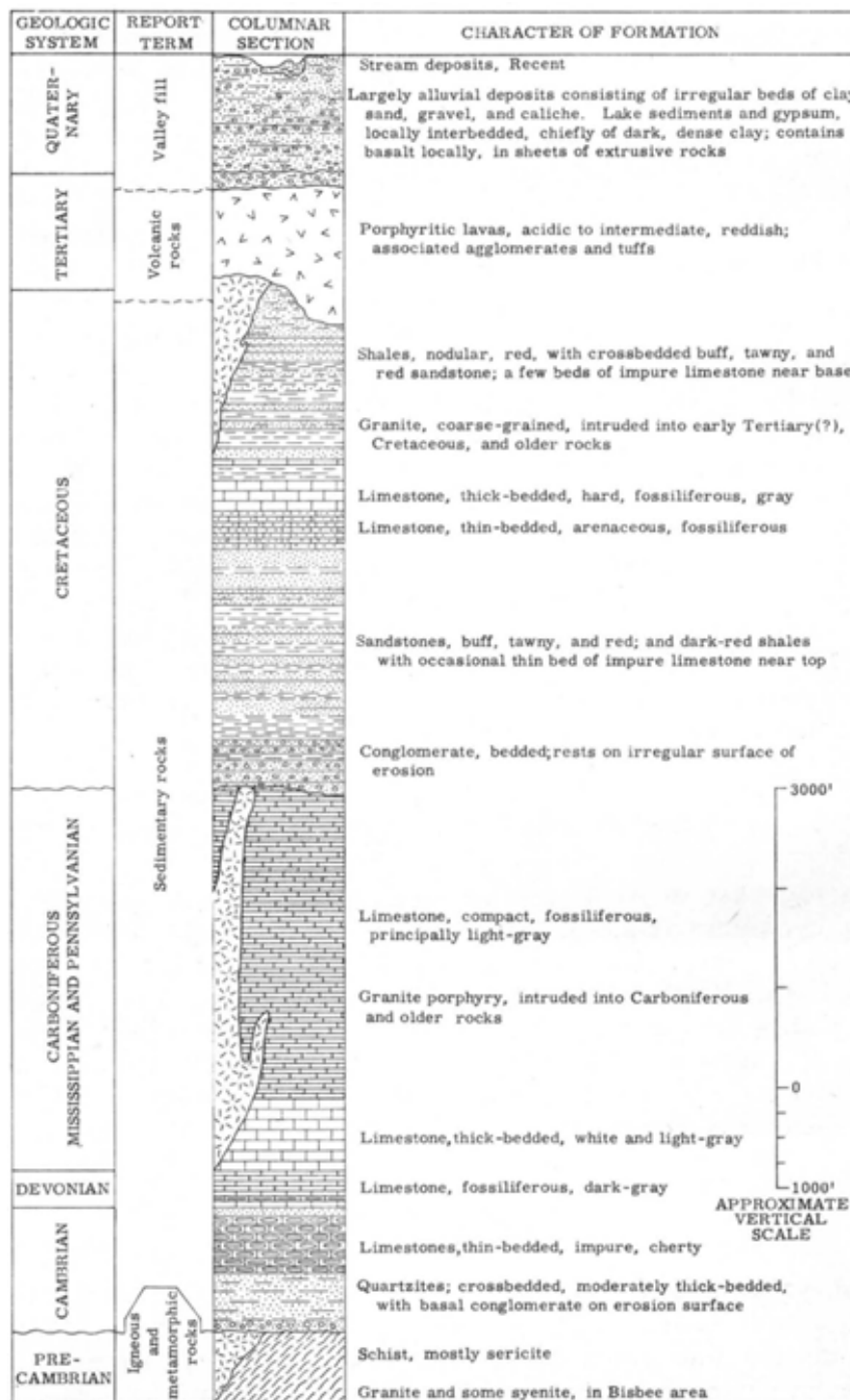
##### **Commercial LPOE**

The proposed Commercial LPOE is located approximately 5 miles to the west of the existing LPOE along the U.S.-Mexico border. The site consists of an 80.5-acre tract of completely undisturbed and undeveloped native desert covered with native grass and plants.

##### ***Geology and Topography***

The geology of the region consists of isolated and dissected fault-block mountains separated by a debris-filled desert valleys known as the Douglas Basin, a part of a large northwest-trending Sulphur Spring Valley. The valley slopes are gentle and concave upward from the axis to defined mountain fronts on the east and west, where mature sedimentary mountains rise abruptly, uplifted from long alluvial slopes to peaks 3,000 to 4,000 feet above the valley floor along northwest-trending fault zones. Bedrock in the mountain areas confines drainage on the east and west, and an arc of low hills to the north separates the Douglas Basin from the Willcox basin. The ROI lies at the central part of the valley in its southern most extent of the U.S (Coates and Cushman 1955). The proposed Commercial LPOE site ranges in elevation from approximately 4,040 to 4,060 above mean sea level. Topography generally slopes downward from west to east. The entirety of the site has been mostly undisturbed and is on relatively flat terrain. The local groundwater and hydrogeologic gradient primarily flow to the east (Terracon 2019). Physiographic features

of the valley have resulted through erosion of the mountain blocks and deposition of more than 2,800 feet of unconsolidated rock debris (Coates and Cushman 1955). The sequence of rock units in the Douglas Basin is shown in the geologic column depicted in Figure 3.5-1.



Source: Coates and Cushman 1955

**Figure 3.5-1. Douglas Basin Geologic Column**



## Soils

Soil is a collective term for the inorganic and organic substrate covering bedrock in which vegetation grows and a multitude of organisms reside. Soils are surveyed nationwide by county. Soil resources provide a foundation for both plant and animal communities by establishing a substrate for plant growth and vegetative cover for animal habitat and feeding.

Soil associations at any given site are determined by five factors: 1) physical and mineralogical composition of the parent material; 2) climate under which the soil material accumulated and has existed since accumulation; 3) plant and animal life atop and within the soil; 4) topography, or the “lay of the land”; and 5) length of time that these forces of soil formation have acted on the parent material (NRCS 2019).

Based on Natural Resource Conservation Service soil survey data, there are four soil associations historically associated with the proposed Commercial LPOE site (NRCS 2021a). The majority of the site, about 77 percent, is mapped as Libby-Gulch complex, 0 to 10 percent slopes<sup>1</sup>. A small section, 21 percent, of the project area is mapped as Guest-Riveroad association, 0 to 1 percent slopes. The soils mapped within the proposed Commercial LPOE site are described below and shown in Figure 3.5-2:

- **Libby, 0 to 10 percent slopes** – Well drained soils with a medium runoff class, belonging to Hydrologic Soil Group C. The parent material for Libby soils is mixed alluvium. A typical Libby soil profile consists of a top 0 to 1 inch layer of very gravelly sandy loam, followed by 1 to 13 inches of clay, 13 to 25 inches of gravelly clay, and 25 to 60 inches of very gravelly clay loam. These soils are typically found on basin floors.
- **Gulch, 0 to 10 percent slopes** – Well drained soils with a medium runoff class, belonging to Hydrologic Soil Group C. The parent material for Gulch soils is mixed calcareous alluvium. A typical Gulch soil profile consists of a 0 to 1 inch layer of gravelly fine sandy loam, followed by 1 to 3 inches of sandy loam, 3 to 10 inches of sandy clay loam, 10 to 24 inches of clay loam, 24 to 60 inches of gravelly clay loam. These soils are typically found on basin floors.
- **Guest, 0 to 1 percent slopes** – Well drained soils with a low runoff class, belonging to Hydrologic Soil Group C. The parent material for Guest is mixed alluvium. A typical Guest soil profile consists of a top 0 to 1 inch layer of clay loam, followed by 1 to 60 inches of clay separated into 3 different profile sections. These soils are typically found in floodplains.
- **Riveroad, 0 to 1 percent slopes** – Well drained soils with a low runoff class, belonging to Hydrologic Soil Group C. The parent material for Riveroad is mixed stream alluvium. A typical Riveroad soil profile consists of a top 0 to 14 inches of fine sandy loam, followed by 14 to 22 inches of silt loam, 22 to 33 inches of silty clay loam, 33 to 53 inches of silty clay, and 53 to 60 inches of sandy loam. These soils are typically found in alluvial fans or floodplains.

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<sup>1</sup> The slope range for each soil type is expressed as a percentage of the distance between two points. A higher slope range can increase erosion potential in a particular area. A 0 to 2 percent slope gradient is considered nearly level, a 2 to 9 percent is considered nearly level to moderately sloping, and a 50 to 75 percent slope gradient is considered a very steep slope.

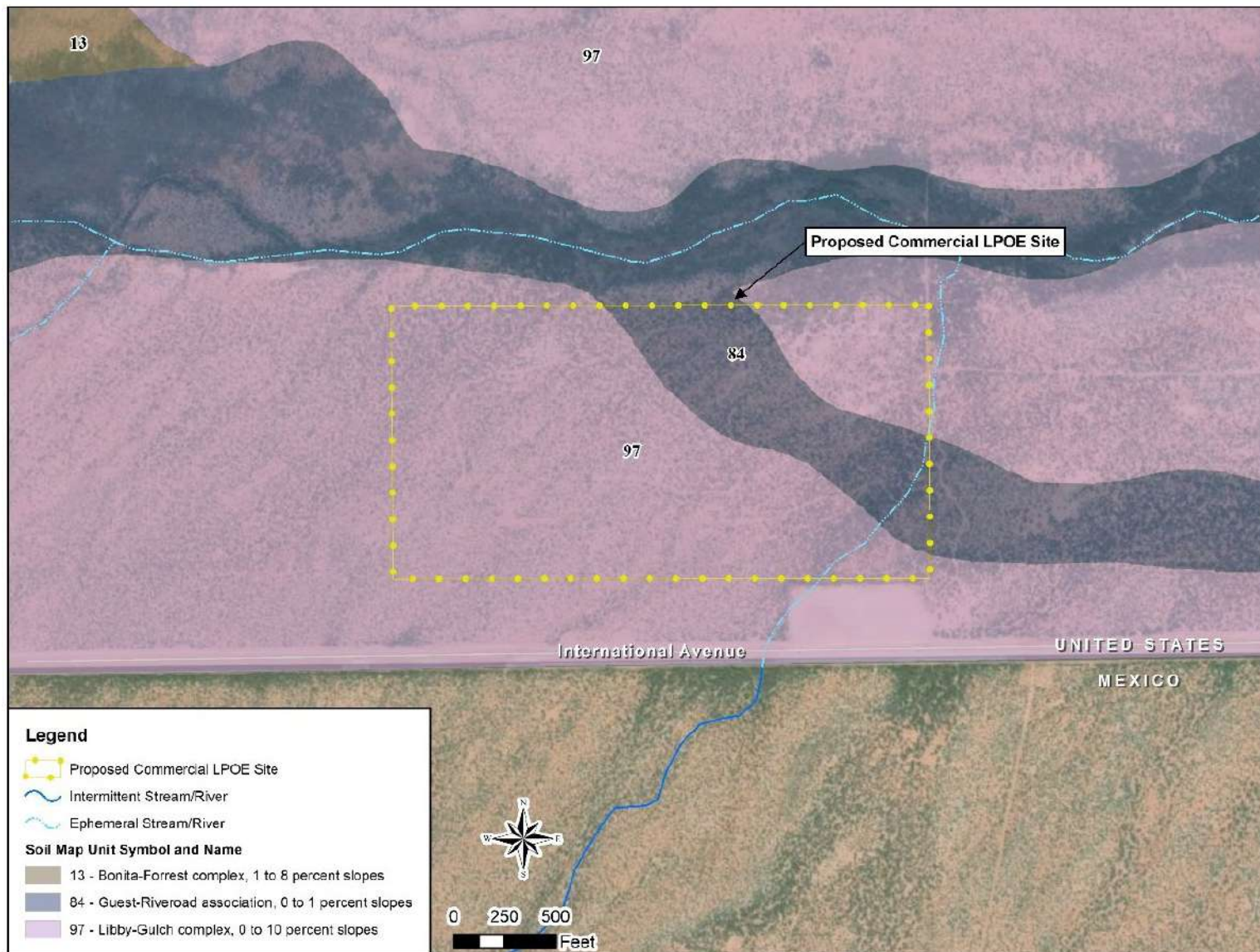


Figure 3.5-2. Soils at Proposed Commercial LPOE Site

## **RHC LPOE**

The RHC LPOE site is a previously disturbed and developed 6-acre area containing mostly paved surfaces located at the southern border of Douglas, Arizona. The expansion areas are located directly north, west, and east of the LPOE. The expansion areas consist of previously disturbed and developed land to the north and east, and undeveloped, but previously disturbed surfaces to the west.

### ***Geology and Topography***

Due to the proximity of the proposed Commercial LPOE, the RHC LPOE and expansion areas share the same geological features and similar topography as the proposed Commercial LPOE discussed above. The project area ranges in elevation from approximately 3,950 to 4,000 above mean sea level. Topography generally slopes downward from east southeast to west northwest (EDR 2022). The majority of the site has been graded and is on relatively flat terrain. The local groundwater flow trends northwest (EAI 2006).

### ***Soils***

Based on Natural Resource Conservation Service soil survey data, there are four soil associations historically associated with the RHC LPOE and expansion areas (NRCS 2021b and 2021c). Most of the existing RHC LPOE, the entire Alternative 3 Expansion Area to the east, roughly half of the Alternative 1 Expansion Area to the north, and most of the Alternative 2 Expansion Area to the west are mapped as Libby-Gulch complex, 0 to 10 percent slopes. The rest of the areas are mapped as Riveroad and Ubik soils, 0 to 5 percent slopes. The soils mapped within the RHC LPOE and expansion areas are described below and shown in Figure 3.5-3:

- **Libby, 0 to 10 percent slopes** – Well drained soils with a medium runoff class, belonging to Hydrologic Soil Group C. The parent material for Libby soils is mixed alluvium. A typical Libby soil profile consists of a top 0 to 1 inch layer of very gravelly sandy loam, followed by 1 to 13 inches of clay, 13 to 25 inches of gravelly clay, and 25 to 60 inches of very gravelly clay loam. These soils are typically found on basin floors.
- **Gulch, 0 to 10 percent slopes** – Well drained soils with a medium runoff class, belonging to Hydrologic Soil Group C. The parent material for Gulch soils is mixed calcareous alluvium. A typical Gulch soil profile consists of a 0 to 1 inch layer of gravelly fine sandy loam, followed by 1 to 3 inches of sandy loam, 3 to 10 inches of sandy clay loam, 10 to 24 inches of clay loam, 24 to 60 inches of gravelly clay loam. These soils are typically found on basin floors.
- **Riveroad, 0 to 5 percent slopes** – Well drained soils with a low runoff class, belonging to Hydrologic Soil Group C. The parent material of Riveroad soils is mixed stream alluvium. A typical Riveroad soil profile consists of a top layer of 0 to 1 inches of silt loam, followed by 1 to 21 inches of more silt loam, and 21 to 60 inches of silty clay loam. These soils are typically found in floodplains and alluvial fans.
- **Ubik, 0 to 5 percent slopes** – Well drained soils with a low runoff class, belonging to Hydrologic Soil Group A. The parent material of Ubik soils is mixed alluvium. A typical Ubik soil profile consists of a top layer of 0 to 5 inches of loam, followed by 5 to 16 inches of silt loam, and 16 to 60 inches of fine sandy loam. These soils are typically found in floodplains and alluvial fans.

As shown in Figure 2-1, the majority of the existing RHC LPOE and alternative expansion areas occupy lands that have been disturbed or developed during previous activities. The entire 4.6-acre main RHC LPOE property has been developed and paved (i.e., buildings, roads, parking areas) or landscaped, and the separate 1.5-acre parking area has been paved or graded. The 2.7-acre expansion area to the north has been disturbed, graded, developed, or landscaped. The 4.4-acre expansion area to the east of RHC LPOE consists of lands that have been graded and developed or paved. The 13.9-acre expansion area to the west of RHC LPOE consists mainly of undeveloped open land, most of which has been disturbed by previous activities.

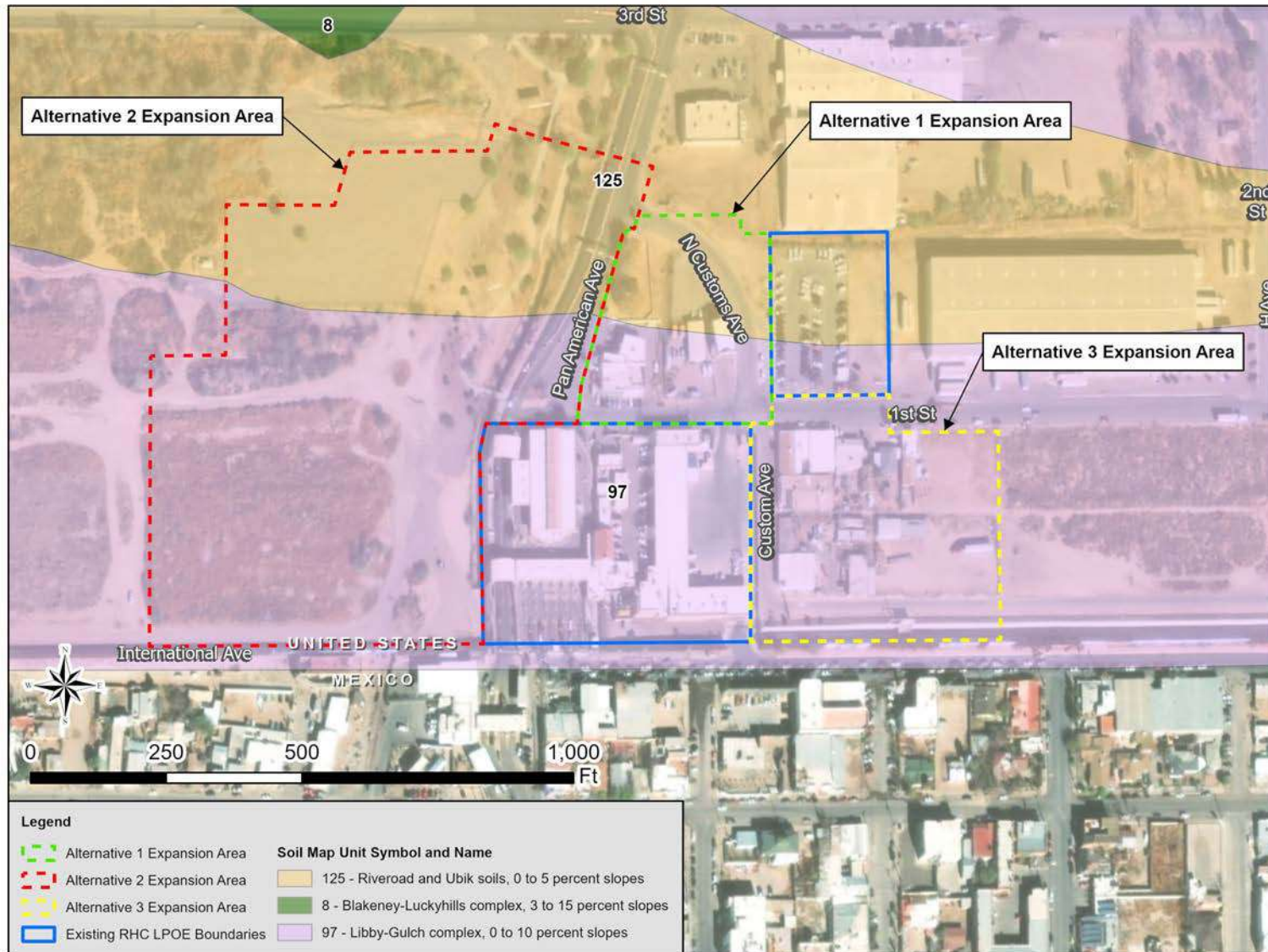


Figure 3.5-3. Soils at RHC LPOE and Expansion Areas

## 3.5.2 Environmental Consequences

### 3.5.2.1 Methodology

To evaluate the impacts on geological and soil resources, GSA reviewed the project alternatives to determine whether any activities have the potential to cause the following within the ROI:

- Modify or otherwise affect geologic features
- Alter the topography or grade of terrain
- Disturb or displace soils

A significant adverse impact to geological resources would occur if the Proposed Action would result in:

- altered geological structures that control groundwater quality;
- exposure of people or structures to potential substantial adverse effects from a geologic hazard (i.e., on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse);
- soil erosion that produces substantial gullying, extensive damage to vegetation, or a sustained increase in sedimentation in streams;
- substantial loss of soil, and/or a substantial decrease in soil stability and permeability; or
- substantial disruption, displacement, compaction, or covering of soils.

Except when installing impermeable surfaces, generally adverse impacts on geological resources can be avoided or minimized if proper construction techniques and erosion-control measures are incorporated into project development.

### 3.5.2.2 No Action Alternative

Under the No Action Alternative, GSA would not construct a new Commercial LPOE or expand and modernize the RHC LPOE. Therefore, there would be no land surface or subsurface disturbance associated with construction activities of new facility structures. Ongoing maintenance to the RHC LPOE would occur, which would generate negligible amounts of land disturbance and soil erosion from ongoing maintenance activities. No impacts to geology or topography would occur.

### 3.5.2.3 Alternative 1 – Sequential Construction

Alternative 1 would have short-term, minor, adverse impacts on geology and negligible impacts on topography during construction of the proposed Commercial LPOE and expansion of RHC LPOE. There would be permanent, moderate adverse impacts to soils at the proposed Commercial LPOE and permanent, minor adverse impacts to soils at the RHC LPOE from construction.

Operations of Alternative 1 would result in long-term, minor, adverse, and indirect impacts to soils at the proposed Commercial LPOE. There would be long-term, negligible, adverse, and indirect impacts to soils at the RHC LPOE during operations.

## Construction

### **Commercial LPOE**

#### *Geology*

Alternative 1 would have short-term, minor adverse impacts on geology during construction within the 80.5-acre parcel to be retained. Construction of a new commercial LPOE facility would require excavation; however, the depth of excavation is currently unknown and would depend on the results of the geotechnical investigation and engineering report to be prepared for the development in accordance with P100 Standards

and current Arizona Building Code. This could involve some disturbance or modification of the surficial geology, but impacts are anticipated to be within a depth comparable to the past construction of the existing RHC LPOE facilities. See Section 3.6, Water Resources for a discussion on groundwater.

### *Topography*

Alternative 1 would have negligible impacts on topography. Within the 80.5-acre parcel to be retained, existing vegetation would be removed, and the site would be graded as necessary. As this portion of the site is relatively flat, the grading of soils would be minimal, and topography would not change substantially from current conditions.

### *Soils*

Alternative 1 would have permanent, moderate adverse impacts on soils. A total 80.5 acres of previously undisturbed soils would be impacted during construction of the Commercial LPOE. The use of heavy equipment for site preparation and construction of buildings, roads/walkways, parking areas and other infrastructure under Alternative 1 would require removal of vegetation, grading, excavation, and filling. If any natural soil horizons exist, they would likely be lost during construction. Heavy equipment may compact or loosen and destroy the structure and function of organic and mineral soils over the long term, reducing soil moisture and most likely resulting in increased runoff and erosion. Soil erosion from use of heavy equipment could also occur as a result of ground disturbance, leading to detachment of soils and transport of freshly disturbed surfaces in wind and stormwater runoff. Soil productivity (i.e., the capacity of the soil to produce vegetative biomass), would be permanently impacted as the surface soils would be replaced with mostly paved development.

The project would be subject to the Arizona Stormwater CGP, which specifies measures for stabilizing soils at the proposed Commercial LPOE site and minimizing soil loss during construction (see Section 3.6, Water Resources). Compliance with the terms of this permit would limit impacts from soil erosion during construction.

## **RHC LPOE**

### *Geology*

Alternative 1 would have short-term, minor adverse impacts on geology during construction within the 8.8-acre parcel to be redeveloped. Impacts would be similar to as described for the Commercial LPOE. Depth of excavation is currently unknown and would depend on the results of the geotechnical investigation and engineering report to be prepared for the project.

### *Topography*

Alternative 1 would have negligible impacts on topography. Impacts would be similar to as described for the Commercial LPOE as this portion of the site is relatively flat, the grading of soils would be minimal, and topography would not change substantially from current conditions.

### *Soils*

Alternative 1 would have permanent, minor adverse impacts on soils. A total 8.8 acres of previously disturbed soils would be impacted during construction and renovation of the new RHC LPOE facilities. Of the 8.8 acres, 8.4 acres are existing developed, paved, or graded areas (i.e., buildings, roadways, parking), and 0.4 acres are existing landscaped areas (city park). Impacts would be similar to as described for the Commercial LPOE but would be less adverse, as a smaller area would be impacted, and the project area is previously disturbed.

Construction at the RHC LPOE would also be subject to the Arizona Stormwater CGP, similar to as described for the Commercial LPOE.

## **Operations**

### **Commercial LPOE**

No impacts to geology or topography are anticipated during operations of Alternative 1. The increase in impervious surfaces (80.5 acres) could contribute to increased potential for water runoff and soil erosion, leading to long-term, minor, adverse, and indirect impacts to soils. Selection of stormwater management facilities is subject to final design but based on other similar LPOE projects may include street drainage connected to storm drains which lead to a bioretention basin system where stormwater would percolate into the ground. Specific design requirements would meet approval under the Arizona Stormwater CGP Stormwater Management Program (Cochise County 2018a).

### **RHC LPOE**

No impacts to geology or topography would occur during operations of Alternative 1. The majority of the site is already disturbed or impervious, and new construction would represent a negligible increase (0.4 acres) in impervious surfaces that could contribute to increased potential for water runoff and soil erosion. Selection and use of stormwater management facilities would be similar to as described for the Commercial LPOE.

### **Alternatives 1a – 1d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 1a through 1d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.1.2.1. As these sub-alternatives would take place within the footprint of the RHC LPOE, the potential impacts to geology, topography, and soil as already identified under Alternative 1 would not change.

#### **3.5.2.4 Alternative 2 – Concurrent Construction (Westward Expansion)**

Alternative 2 would have short-term, minor, adverse impacts on geology and negligible impacts on topography during construction of the proposed Commercial LPOE and expansion of RHC LPOE. There would be permanent, moderate adverse impacts to soils at the proposed Commercial LPOE, and permanent, minor to moderate adverse impacts to soils at the RHC LPOE from construction.

Operations of Alternative 2 would result in long-term, minor, adverse, and indirect impacts to soils at the proposed Commercial LPOE and RHC LPOE during operations.

## **Construction**

Under Alternative 2, concurrent construction at the RHC LPOE, the Alternative 1 Expansion Area, and the proposed Commercial LPOE site would result in similar impacts to geology and soils to those described under Alternative 1. Alternative 2 would also include the Alternative 2 Expansion Area (up to 13.9 additional acres) and primarily consists of undeveloped, but disturbed, open land area. Therefore, the extent of impacts to geology and soils would be greater under Alternative 2 at the RHC LPOE. The Alternative 2 Expansion Area represents the maximum build-out that GSA would consider. Soil resources would have a permanent, minor to moderate adverse impact depending on the extent of the construction build-out (i.e., up to 22.7 acres). GSA may, instead, acquire temporary easements from the city for construction laydown areas, which would result in similar short-term, minor adverse impacts to disturbed surface soils, as described in Alternative 1, due to staging and use of heavy construction equipment. Disturbed areas would be returned to existing conditions post construction activities. Final plans for land acquisition would be determined during the design process for the RHC LPOE.

## **Operations**

Under Alternative 2, impacts to geology and soil resources during operations would be similar to those described under Alternative 1. However, because Alternative 2 also includes the Alternative 2 Expansion Area (up to 13.9 additional acres), the extent of these impacts would also be greater. New construction

would increase the amount of impervious surfaces that could contribute to increased potential for water runoff and soil erosion by up to 14.3 acres, resulting in long-term, minor, adverse, and indirect impacts to soils. Selection and use of stormwater management facilities would be similar to as described for the Commercial LPOE.

### **Alternatives 2a – 2d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 2a through 2d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.2.1. As these sub-alternatives would take place within the footprint of the RHC LPOE, the potential impacts to geology and soil resources as already identified under Alternative 2 would not change.

#### **3.5.2.5 Alternative 3 – Concurrent Construction (Eastward Expansion)**

Alternative 3 would have short-term, minor, adverse impacts on geology and negligible impacts on topography during construction of the proposed Commercial LPOE and expansion of RHC LPOE. There would be permanent, moderate adverse impacts to soils at the proposed Commercial LPOE, and permanent, minor to moderate adverse impacts to soils at the RHC LPOE from construction.

Operations of Alternative 3 would result in long-term, minor, adverse, and indirect impacts to soils at the proposed Commercial LPOE and RHC LPOE during operations.

#### **Construction**

Under Alternative 3, concurrent construction at the RHC LPOE, the Alternative 1 Expansion Area, and the proposed Commercial LPOE site would result in similar impacts to geology and soils to those described under Alternative 1. Alternative 3 would also include the Alternative 3 Expansion Area (up to 4.4 additional acres); this would represent a smaller land area than the Alternative 2 Expansion Area (up to 9.5 acres less), and it primarily includes previously developed and disturbed lands. Therefore, the extent of impacts to geology and soils would be lesser under Alternative 3 at the RHC LPOE than for Alternative 2. Soil resources would have a permanent, minor to moderate adverse impact depending on the extent of the construction build-out (i.e., up to 13.2 acres). Final plans for land acquisition would be determined during the design process for the RHC LPOE.

#### **Operations**

Under Alternative 3, impacts to geology and soil resources during operations would be similar to those described under Alternative 1. The extent of impacts would be greater than Alternative 1 but less than Alternative 2 based on the relative sizes of the expansion areas. Because the Alternative 3 Expansion Area is already occupied by structures and paved surfaces, new construction would not substantially increase impervious surfaces that could contribute to increased potential for water runoff and soil erosion. Approximately 1.8 acres are open, undeveloped land; but more than half of that area has been cleared, graded, and compacted for use as a graveled parking lot. Thus, less than an acre of the entire Alternative 3 Expansion Area has land that contains vegetation and is not impervious. Conservatively, it is assumed that up to 1.4 additional acres of impervious surfaces could be added under Alternative 3, to include impervious surfaces added in the Alternative 1 Expansion Area. Selection and use of stormwater management facilities would be similar to as described for the Commercial LPOE.

### **Alternatives 3a – 3d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 3a through 3d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.2.1. As these sub-alternatives would take place within the footprint of the RHC LPOE, the potential impacts to geology and soil resources as already identified under Alternative 3 would not change.



### **3.5.2.6 Impact Reduction Measures**

Measures to reduce construction impacts on geology and soil-related concerns such as soil erosion, loss, and stability would be addressed in project design plans and through erosion and sediment controls as well as site stabilization controls per the Arizona Stormwater CGP requirements. Refer to Section 3.6, Water Resources for a discussion of measures that would limit impacts from soil loss as a result of erosion during construction and operations.

## 3.6 WATER RESOURCES

This section describes the baseline conditions for water resources in the project area and potential impacts that could result from implementing the Proposed Action, including the alternatives discussed in Chapter 2. Water resources may be grouped into five different areas that characterize the spectrum of potential impacts to this resource, including water quality, groundwater and water supply, surface water, floodplains, and wetlands.

### 3.6.1 Affected Environment

#### 3.6.1.1 *Region of Influence*

The ROI for surface water, floodplains, and wetlands includes those resources that exist within the project areas for the construction and operation of the proposed Commercial LPOE or the expanded and modernized RHC LPOE, including the expansion areas for Alternatives 1, 2, and 3. It also includes the surface waters that would receive stormwater and wastewater discharges from the construction and operation of the Proposed Action.

The ROI for groundwater resources includes any drinking water aquifer that underlies the project areas, as well as any aquifers that would be used as a source of water to support construction and operations.

#### 3.6.1.2 *Regulatory Setting and Requirements*

##### Water Quality

Water quality is regulated within the context of meeting standards established for compliance with the Federal Clean Water Act (CWA). The ADEQ is the agency responsible for regulating water quality in Arizona. ADEQ implements several CWA and Arizona Surface Water Protection Program (SWPP) programs to maintain surface water quality. CWA requirements potentially relevant to this project include:

- **Integrated CWA Sections 303(d) and 305(b)** – The integrated Sections 303(d) and 305(b) reporting process of the CWA requires that states identify water quality segments that fail to meet water quality standards. Section 303(d) lists impaired waters (i.e., surface waters for which water quality standards for at least one designated use are not met). Section 305(b) is the water quality assessment portion of that process.
- **CWA Section 402** – Section 402 establishes the National Pollutant Discharge Elimination System (NPDES) program, which is administered as the AZPDES program in the state of Arizona. This program requires government-owned areas, such as the City of Douglas, to obtain a Municipal Separate Storm Sewer System (MS4) permit for stormwater discharges. MS4 permits require preparation and implementation of a stormwater management plan (SWMP), a comprehensive planning tool to reduce the discharge of pollutants to and from the MS4 to the maximum extent practical, thus protecting the quality of water in the receiving water bodies. Additionally, construction activities that disturb 1 or more acres of land and result in stormwater discharges that enter Arizona surface waters or an MS4 leading to Arizona surface waters are required to obtain a CGP (ADEQ 2022e). A Stormwater Pollution Prevention Plan (SWPPP) is required prior to submitting an NOI for a CGP permit under the AZPDES program.

Because an estimated 300,000 or more residents in Arizona draw their drinking water from private wells, ADEQ administers its Groundwater Protection Program to characterize groundwater quality in each of its 51 basins (ADEQ 2021). The groundwater basin studies under this program are valuable resources in meeting water quality standards set by the Federal Safe Drinking Water Act.

GSA would maintain compliance with stormwater runoff requirements under Section 438 of the EISA of 2007. The intent of Section 438 of the EISA is to require federal agencies to develop and redevelop applicable facilities in a manner that maintains or restores stormwater runoff to the maximum extent

technically feasible. Development or redevelopment projects involving federal facilities with a footprint that exceeds 5,000 square feet are required to use site planning, design, construction, and maintenance strategies for the property to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the property with regard to the temperature, rate, volume, and duration of flow.

GSA would also manage stormwater runoff in compliance with the Cochise County Stormwater Ordinance (Ordinance No. 049-18). This ordinance regulates non-stormwater discharges to the storm drainage system and includes requirements for a SWPPP and applicable stormwater treatment measures or BMPs for every construction project, with few exceptions. Inspections by the county or state may occur to determine compliance with the SWPPP. This ordinance requires that no construction-related disturbance may occur “until the Stormwater letter of acceptance along with the drainage analysis, the construction plans, the Stormwater Site Plan (SWPPP and NOI) and Operations and Maintenance plans have been reviewed and accepted by the Department [ADEQ]” (Cochise County 2018b).

### **Groundwater and Water Supply**

Groundwater usage and water supply in Arizona are regulated by the Arizona Department of Water Resources (ADWR). In 1980, the Groundwater Management Act was enacted in Arizona to manage areas where groundwater pumping was heaviest, which were designated as Active Management Areas (AMAs). The Groundwater Management Act generally does not regulate groundwater use in areas outside of AMAs but instead requires only that groundwater be put to reasonable and beneficial use. However, due to concerns over dropping groundwater levels, the Groundwater Management Act designated three areas outside of the AMAs as Irrigation Non-Expansion Areas (INA), where the irrigation of new lands is prohibited (ADWR 2022c and 2022d).

In all areas of the state, the Groundwater Management Act requires wells to be registered with ADWR and new wells to be constructed in compliance with ADWR’s well construction standards.

Due to the increasing strain on water supply in the area, Cochise County outlines guidance and policies in the latest comprehensive plan for water conservation. These BMPs emphasize water use efficiency, reuse, and conservation wherever possible and include, for example, the encouragement of the use of drought tolerant landscaping, low-flow fixtures, and other conservation measures (Cochise County 2015).

### **Floodplains**

Floodplains are areas of land adjacent to rivers and streams that convey overflows during flood events. The Federal Emergency Management Agency (FEMA) defines a floodplain as being any land area susceptible to being inundated by water from any source (FEMA 2022a). FEMA prepares Flood Insurance Rate Maps that delineate flood hazard areas, such as floodplains, for communities. These maps are used to administer floodplain regulations and to reduce flood damage. Typically, these maps indicate the locations of 100-year floodplains, which are areas with a 1 percent chance of flooding occurring in any single year; and 500-year floodplain, which are areas defined as having a 0.2 percent annual chance flood hazard or areas of 1 percent annual chance flood with average depth less than 1 foot or with drainage areas of less than 1 square mile.

Federal activities within floodplains must comply with EO 11988, *Floodplain Management*. Per EO 11988, federal agencies are required to avoid long- and short-term adverse effects associated with the occupancy and modification of floodplains to the extent possible wherever there is a practicable alternative, thereby minimizing flood risk and risks to human safety. An eight-step decision-making process for floodplain management is outlined in 44 CFR 9.6.

## **Wetlands and Waters of the U.S.**

EO 11990, *Protection of Wetlands*, requires that federal agencies take measures to not only minimize the destruction, loss, or degradation of wetlands, but also to enhance wetland habitats. Wetlands are regulated by ADEQ and water quality standards are in place to protect designated uses of wetlands.

The U.S. Army Corps of Engineers (USACE) regulates and permits the discharge of fill material into waters of the U.S. (WOTUS) in Arizona under Section 404 of the CWA. WOTUS are defined in 33 CFR 328.4(c) as those that compose the area of a watercourse that extends up to the ordinary high-water mark in the absence of wetlands. WOTUS include recognized surface waters, but also wetlands, ephemeral streams, and other types of water that have a significant nexus to traditionally navigable waters.

### **3.6.1.3 Existing Conditions**

Due to the interconnected nature of water resources within the ROI, this section discusses the general affected environment for both the RHC LPOE and the proposed Commercial LPOE. Where there are differences between the sites requiring distinction between the two locations, these are described in the text as appropriate.

#### **Geographic and Hydrologic Setting**

The project area is located in the Douglas Groundwater Basin (also referred to as the Douglas-Agua Prieta Groundwater Basin), which encompasses approximately 950 square miles in the southeastern corner of Cochise County and extends from the U.S.-Mexico border northward to the southern end of the Dragoon Mountains (USEPA 2014). Due to the arid climate in the region, most of the drainage channels are ephemeral or intermittent waterways. Ephemeral waterways are defined as rivers and streams that flow only as a response to storm events. Intermittent waterways flow only during a portion of the year. Due to the flash flood tendency of the washes, sediment loads are high when water is present. Natural and human-induced factors determine the quality of these resources (INS 2002). Figure 3.6-1 illustrates the primary hydrologic features surrounding the project areas.

Average runoff varies within the basin from 0.2 inch per year in the middle portion of the basin to 2 inches per year at the northern boundary of the basin (USEPA 2014). The region receives approximately 10 to 20 inches of rain per year with most of the rainfall occurring during the monsoon season between June and August (NOAA 2022).

Since the Douglas Groundwater Basin extends into Mexico, managing both groundwater and surface water is of international concern. The U.S. International Boundary and Water Commission is the federal agency responsible for applying boundary and water treaties concerning water issues between the U.S. and Mexico (IBWC 2022).

#### **Groundwater and Water Supply**

Groundwater in the Douglas Groundwater Basin generally flows toward the center of the valley then south towards Mexico (ADEQ 2000). Groundwater from this basin is primarily used for irrigation followed by domestic use. The aquifer in the Douglas Basin generally comprises alluvial basin-fill sediments consisting of semi-consolidated to poorly consolidated sand, silt, clay, gravel and conglomerate. The saturated thickness of the aquifer in the project area is approximately 1,600 to 2,000 feet (ADWR 2016). Groundwater levels have generally been declining in the Douglas Groundwater Basin by an average of 1.3 feet per year; groundwater levels in the City of Douglas declined between about 15 and 30 feet over the years 2005 to 2015 (ADWR 2016).

Groundwater depth-to-water levels within the ROI range from 10 feet below ground surface near the Whitewater Draw to 360 feet below ground surface below the City of Douglas. Depth to bedrock estimates in the project area ranges from approximately 1,600 to 2,000 feet, while existing well depths range from 24 to 1,100 feet (ADWR 2016).

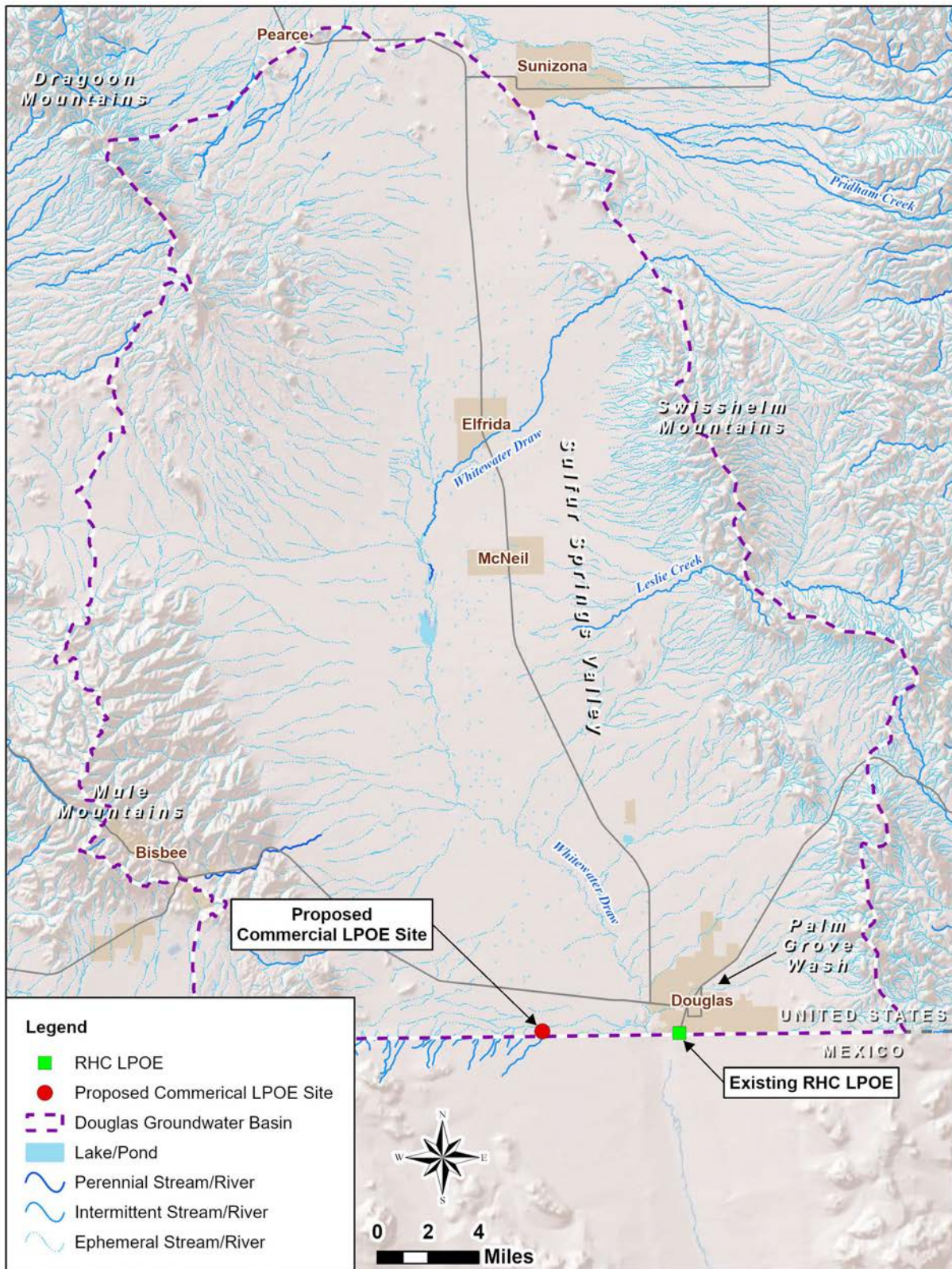


Figure 3.6-1. Hydrologic Features within the ROI

A Preliminary Geotechnical Engineering investigation prepared for the Commercial LPOE site did not indicate the presence of groundwater in any test borings conducted at the time of field exploration nor when checked immediately upon completion of drilling (GSA 2019a). These observations represent groundwater conditions at the time of the field exploration and may not be indicative of other times, or at other locations. Groundwater conditions can change with varying seasonal and weather conditions, among other factors. Based on information obtained from the Arizona Department of Water Resources (ADWR 2022b), the groundwater well most proximate to the proposed Commercial LPOE is located approximately 2,000 feet to the northwest and in 1992 had a depth to groundwater measured as 122.3 feet. In 2021, a well located approximately 4,800 feet north of the Commercial LPOE site had a depth to groundwater of 107.9 feet (ADWR 2022b).

The groundwater well identified as being closest to the RHC LPOE project area is located approximately 1,800 feet northeast of the Alternative 2 Expansion Area (ADWR 2022b). The depth to groundwater measured at this well was last measure in 1992 to be 45.6 feet below the ground. For a more recent measurement, the second most proximate groundwater well to RHC LPOE project area is located approximately 3,400 feet northwest and had an observed depth to groundwater of 248 feet in 2021.

Generally, groundwater use in the Douglas Basin has been increasing steadily. Estimated groundwater consumption in the Douglas Basin in 1991 was 36,500 acre-feet, and in 2014 increased to 45,500 acre-feet (ADWR 2016). The 2021 Douglas Consumer Confidence Report states that the City of Douglas's total domestic water use ranges from 2,800 to 4,800 acre-feet per year. Based on recent water use reports for the RHC LPOE, the existing port's current annual water demand is approximately 2.8 acre-feet (900,000 gallons) (GSA 2022c). The City of Douglas gets all of its water supply from six wells that pump from the Douglas Groundwater Basin (City of Douglas 2021a). There are no wells within the project areas; however, there are five total wells and three active groundwater wells north of the U.S.-Mexico border within 1 mile of the existing RHC LPOE; one additional active groundwater well is located approximately 0.5 mile north of the proposed Commercial LPOE. Most of these wells are privately owned and utilize groundwater for domestic or industrial use except for one well owned by the City of Douglas that is used to produce municipal water (ADWR 2022).

The project area was previously included within the boundaries of the Douglas INA, which meant that domestic and municipal water uses were subject to restrictions imposed by the INA classification. However, in 2021, a petition was filed to change the status of the Douglas Groundwater Basin from an INA to an AMA which would subject groundwater withdrawal to certain regulations (ADWR 2022c). The Douglas AMA was designated in December 2022. Pursuant to Arizona Revised Statutes (A.R.S.) § 45-416, only those lands that were legally irrigated in the five years preceding August 30, 2022 may be irrigated<sup>2</sup> within the basin. This prohibition remains in effect permanently. Additionally, persons may withdraw groundwater from a well having a pump with a maximum capacity greater than 35 gallons per minute only if the person holds a right or permit to withdraw the groundwater. Generally, within an AMA, a person may withdraw groundwater for a non-irrigation use from a well having a pump with a maximum pump capacity of 35 gallons per minute or less without a right or permit (ADWR 2022d). Figure 3.6-1 shows the Douglas Groundwater Basin, which is entirely designated as an AMA.

### **Surface Water**

The Douglas Groundwater Basin is drained by one ephemeral stream, the Whitewater Draw, which is the primary surface water drainage for both project areas. The stream begins in the Chiricahua Mountains and drains the basin in a southerly direction, continuing across the U.S.-Mexico border. The Whitewater Draw is stagnant much of the year but has registered flows of up to a maximum daily flowrate of 493 cubic feet per second at the USGS stream gauging station near Douglas. Standards are in place to regulate aquatic and

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<sup>2</sup> "Irrigate" is defined as applying water to two or more acres of land to produce plants or parts of plants for sale or human consumption, or for use as feed for livestock, range livestock or poultry (A.R.S. § 45-402).

wildlife, full body contact, fish consumption, agricultural livestock watering, and partial body contact in this stream (AZSoS 2016).

Two unnamed branches of the Whitewater Draw flow near the two project areas (see Figures 3.6-2 and 3.6-3). A stream runs west to east approximately 200 feet north of the proposed Commercial LPOE west of the City of Douglas. This stream discharges into the Whitewater Draw about 1 mile west of the City of Douglas. An ephemeral branch of this stream is mapped across the southeast corner and along the eastern edge of the proposed Commercial LPOE site. As the topography of the site slopes gently to the east, this ephemeral stream collects runoff from the property and flows north to join the larger stream and then to the Whitewater Draw.

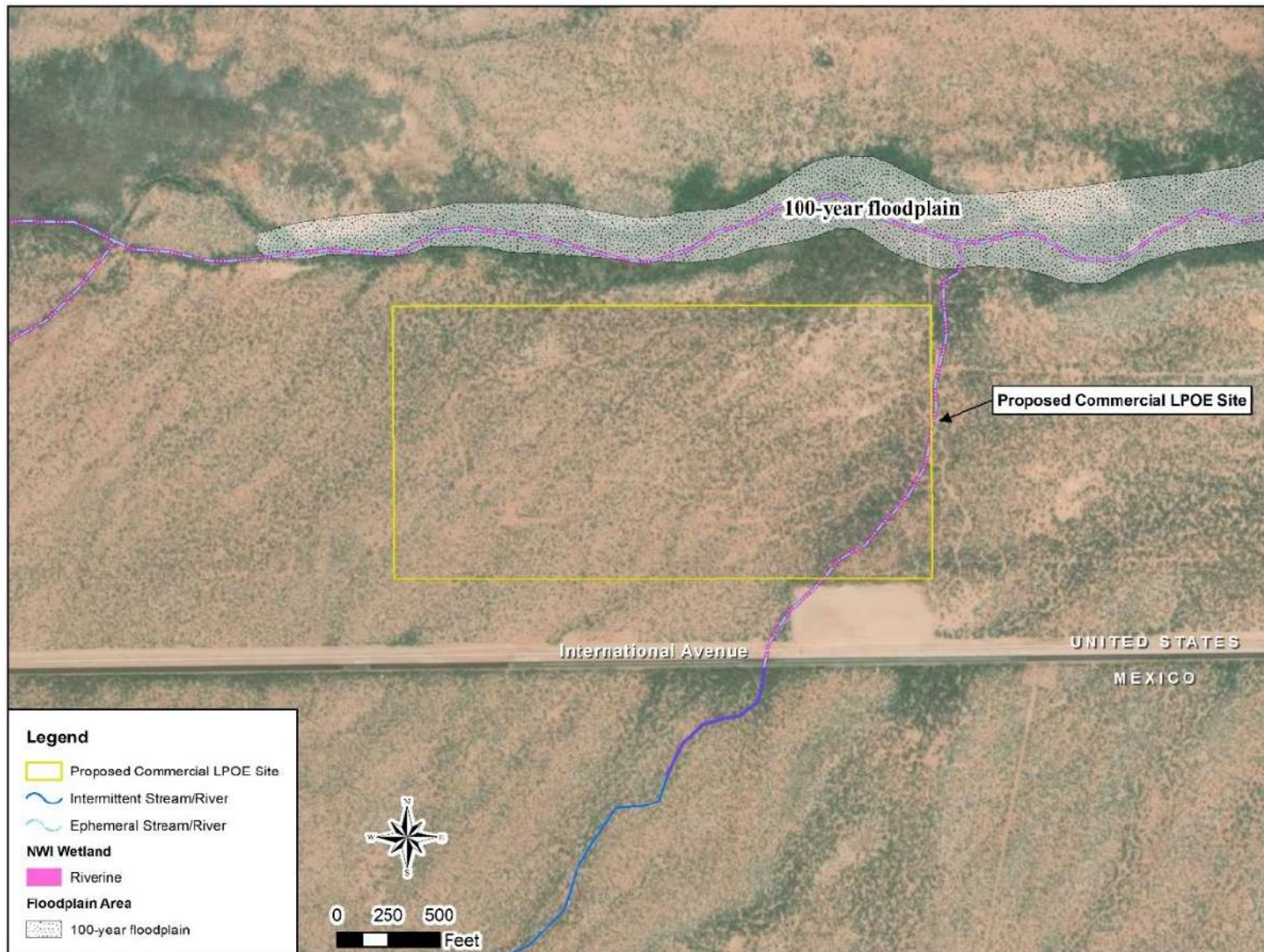


Figure 3.6-2. Water Resources at the Commercial Site



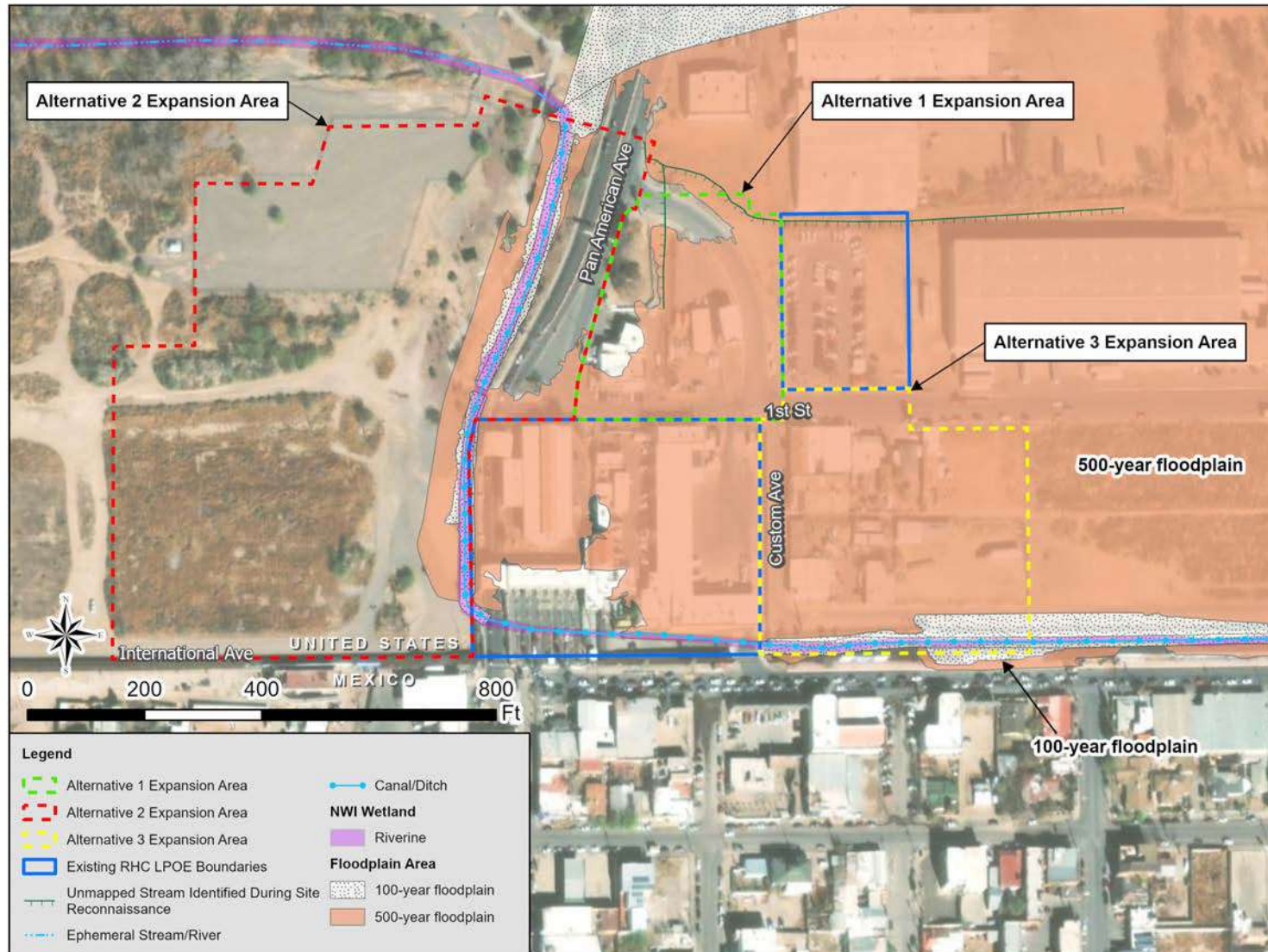


Figure 3.6-3. Water Resources at the RHC LPOE

Near the RHC LPOE, another small stream runs east to west directly on the northern edge of the Alternative 2 Expansion Area. Stormwater runoff from the RHC LPOE drains to this unnamed branch via a concrete-lined channel that runs through the Alternative 2 Expansion Area, parallel to Pan American Avenue directly west of the RHC LPOE. The stream flows west just south of 3<sup>rd</sup> Street then turns south before crossing the border into Mexico and draining into the Whitewater Draw. Potential segments of this stream that are not mapped within USGS stream data but were observed during site reconnaissance activities are located east of Pan American Avenue as well as south of Customs Avenue.

The City of Douglas is authorized under the AZPDES permit program to discharge its stormwater through an MS4 outfall to Palm Grove Wash, which drains untreated to Whitewater Draw. Cochise County's Stormwater Management Program (Cochise County 2018a) and the city's SWMP (City of Douglas 2018a) identify measures to mitigate the impact of urban activities, including construction projects, to receiving waters. According to the county's program document, Palm Grove Wash is not listed as an impaired stream (Cochise County 2018a). The City of Douglas was previously home to the Phelps Dodge copper smelter, which has since closed, but a large slag pile remains in place. This facility is located between the two project areas, approximately 0.7 mile west of the existing RHC LPOE and 3.5 miles east of the proposed Commercial LPOE. The Whitewater Draw runs through the center of the former Phelps Dodge smelter site, and concerns have been raised about storm flows carrying contaminants from the site south to Agua Prieta (Sonora, Mexico). Specifically, lead and arsenic have been found in the Whitewater Draw and in local wells below action levels (UA 2008). The City of Douglas and Agua Prieta (Sonora, Mexico) have historically approached the issues of stormwater as a regional issue, in part due to the natural gradient of the land (City of Douglas 2018b). Currently, the smelter site is not on the National Priorities List based on an USEPA Comprehensive Environmental Response, Compensation, and Liability Act determination (USEPA 2022). The site also does not have any active remediation under ADEQ's Voluntary Remediation Program (VRP). Neither the Whitewater Draw nor any of its tributary streams within the ROI are currently identified as impaired per the ADEQ 303(d) List of Impaired Waters (ADEQ 2022d and 2022c) or per the Arizona Assessment of Intermittent Streams (ADEQ 2018).

### **Floodplains**

Based on a review of FEMA mapping, the proposed Commercial LPOE site is not within the 100- or 500-year floodplain (FEMA 2022b). A 100-year floodplain is located to the north of the proposed Commercial LPOE site and is associated with an unnamed branch of Whitewater Draw that flows from west to east towards downtown Douglas. Designated 100-year floodplains are considered high risk, as they have a 1 percent probability of flooding every year and are where predicted flood water elevations have not been established.

The RHC LPOE site is relatively flat and located on an alluvial plain. The existing port and much of the City of Douglas sits on the low point of a regional drainage field and almost completely within areas designated as 100- or 500-year floodplains. An existing regulatory floodway, handled by a box culvert and designated as a 100-year floodplain in Figure 3.6-3, lies directly to the west of the existing port along Pan American Avenue. Per FEMA (2022), a regulatory floodway is defined as, "the channel of a river or other watercourse and the adjacent land areas that must be reserved in order to discharge the base flood without cumulatively increasing the water surface elevation more than a designated height." In the past, areas along 1<sup>st</sup> Street and the entry to the Cargo Lot from Mexico have been particularly vulnerable to flooding (GSA 2019a); however, a drainage correction project at the RHC LPOE was implemented within the last 5 years and has since resolved flooding issues (Luttrell 2022).

### **Wetlands and Waters of the U.S.**

Per the USFWS National Wetlands Inventory, an unnamed riverine feature classified as Riverine Surface Flooding Seasonal (R4SBC) is mapped within the proposed Commercial LPOE site (approximately 944 feet; see Figure 3.6-2). No actual signs of hydrology including bed or bank features or wetlands were

observed to be associated with this riverine feature during a biological reconnaissance conducted for the project (EcoPlan Associates, Inc. 2022).

Near the RHC LPOE, there are mapped riverine features as shown in Figure 3.6-3, including approximately 870 feet along the western boundary of the existing RHC LPOE and Pan American Avenue within the Alternative 2 Expansion Area (classified as Riverine Surface Flooding Seasonal [R4SBC]), as well as approximately 500 feet across the southern part of the existing RHC LPOE site and 460 feet along the southern portion of the Alternative 3 Expansion Area (classified as Riverine, Unknown Perennial, Unconsolidated Bottom, Semi-permanently Flooded, Excavated [R5UBFx]). These features are associated with a concrete-lined stormwater runoff channel, including the regulatory floodway discussed above under *Floodplains*, that discharges to another riverine feature directly north of the RHC LPOE. This riverine feature may be considered a WOTUS within the bed and bank sections, as it appears to drain ultimately to the Whitewater Draw (EcoPlan Associates, Inc. 2022). Unmapped segments of this feature were also identified within the project area during site reconnaissance activities (see Figure 3.6-3), including 215 linear feet north of the existing LPOE parking lot, approximately 305 linear feet across the northeast corner of the Alternative 1 Expansion Area, and approximately 35 linear feet across the northeast corner of the Alternative 2 Expansion Area, and may also be considered WOTUS.

### 3.6.2 Environmental Consequences

#### 3.6.2.1 Methodology

To evaluate the impacts on water resources, GSA reviewed the project alternatives to determine whether any activities have the potential to cause the following within the ROI:

- Alteration of stormwater discharges or infiltration rates
- Alteration of groundwater recharge rates
- Discharge to or modification of surface waters or groundwater
- Use of surface water or groundwater
- Disturbance to wetlands
- Disturbance to floodplains

A significant adverse impact to water resources would occur if the Proposed Action would result in:

- Substantial alteration of stormwater discharges or infiltration rates, which could adversely affect drainage patterns, flooding, erosion, and sedimentation;
- Substantial alteration of groundwater recharge rates, which could adversely affect availability of groundwater;
- Violation of any federal, state, or regional water quality standards or discharge limitations;
- Modification of surface waters such that water quality no longer meets water quality criteria or standards established in accordance with the CWA, state regulations, or permits (including downgrades of surface water use classification or listing on the Nationwide Rivers Inventory);
- Changes to the availability of surface water or groundwater resources for current or future uses;
- Change in stream channel morphology (i.e., slope and stability);
- Loss of wetlands from the placement of dredge or fill material;
- Alteration or conversion of wetland function caused by the removal of vegetation or contamination from an accidental release of petroleum, oils, or lubricants (POL) or hazardous materials; or
- Increased flooding (flooding risk to nearby properties) through altered land uses (e.g., development in floodplain areas) that change current flooding levels or patterns.

### **3.6.2.2 No Action Alternative**

Under the No Action Alternative, GSA would not construct a new Commercial LPOE or expand and modernize the RHC LPOE. Therefore, there would be negligible impacts on surface waters due to runoff during ongoing maintenance activities. No impacts to groundwater, floodplains, or wetlands would occur. Since no new GSA building construction or renovation would occur, there would be no water conservation management technology implemented, and water consumption would remain at or near current levels.

### **3.6.2.3 Alternative 1 – Sequential Construction**

Construction of the proposed Commercial LPOE and RHC LPOE under Alternative 1 would result in short-term, minor, adverse, and indirect impacts to surface waters; and short-term, minor adverse and direct impacts to groundwater. Construction at the RHC LPOE would also result in long-term, minor, adverse, direct and indirect impacts to floodplains.

Operations of Alternative 1 would result in long-term, minor, adverse, and indirect impacts to surface waters and groundwater at the proposed Commercial LPOE. There would be similar impacts at the RHC LPOE, but overall impacts would be negligible to minor.

## **Construction**

### ***Commercial LPOE***

Although NWI mapping indicates 944 feet of seasonally flooded riverine feature located along the southeast portion of the Commercial LPOE site, a site reconnaissance determined this feature is not perennial in nature and no evidence of hydrology (e.g., bed and bank features) was observed at the site. Therefore, construction of the Commercial LPOE would not have direct impacts to surface waters. Short-term, minor, adverse, and indirect impacts to downstream surface waters could occur due to increased potential for sedimentation and contamination from construction site runoff, as well as increased potential for spills of petroleum products or other hazardous materials stored onsite during construction. Sediments potentially contaminated by such spills could travel offsite and adversely affect water quality in offsite surface waters, including the unnamed ephemeral stream that flows north of the proposed Commercial LPOE site. Contaminants would ultimately travel to the Whitewater Draw or percolate to the groundwater.

Because the project would disturb more than 1 acre of land, implementation of Alternative 1 would include adherence to the terms of Arizona Stormwater CGP and City of Douglas Permit. Conditions of these permits require development of appropriate documentation (i.e., Notice of Intent, site map, SWPPP, signed certification statement, post-construction documentation, and payment of fees). A SWPPP is required to be developed prior to construction to address control of pollutant discharges using BMPs selected for the specific project and to address stormwater monitoring. These BMPs include, but are not limited to, the measures summarized in Section 3.6.2.6. New development would also be required to comply with the terms of the City of Douglas new development stormwater requirements, which require all development and redevelopment projects, where applicable and feasible, to include oil/water separators prior to retention ponds, utilize low water use/drought-tolerant planting, and on-site retention (City of Douglas 2018a). Additional sustainable stormwater management practices would be reviewed and applied as applicable, including management of surface water runoff previously conveyed by existing seasonally flooded riverine features. The permit also ensures conformance with stormwater, erosion, sediment control, and land use requirements. The project is required to have the City of Douglas permit, AZPDES permit, and an NOI on site at all times. Following construction, the site must meet the conditions for Notice of Termination by certifying the site has been stabilized and there is no potential for construction-related stormwater discharges. Post-construction BMPs and long-term maintenance plans must also be in place in order to apply for Notice of Termination. With adherence to these conditions, overall impacts to surface waters from potential spills, erosion, and sedimentation during construction would remain minor.

Short-term, minor adverse impacts to groundwater could occur depending on groundwater depth-to-water at the Commercial LPOE site since construction could affect groundwater flow or degrade existing

groundwater quality. GSA would implement appropriate measures to prevent any groundwater contamination, such as that arising from hazardous materials used during construction or accidental releases of petroleum from construction equipment (see Section 3.13, Human Health and Safety). Groundwater is not anticipated to be encountered, based on historical levels of groundwater at nearby wells (i.e., 45.6 feet). Should dewatering be required during construction, GSA would obtain appropriate permits as needed for groundwater dewatering discharge (i.e., Application for Permit to Withdraw Groundwater for Temporary Dewatering Purposes within an Active Management Area in accordance with A.R.S. § 45-518).

Under a separate action, the City of Douglas plans to drill a groundwater well to support potential development in the area near the proposed Commercial LPOE, to include potential construction of the Commercial LPOE. Water use from construction activities (e.g., for making concrete and dust control) is expected to be minimal and would have short-term, minor and direct adverse impacts to the regional water supply, and indirect adverse impacts as it contributes to the overall declining trend of water levels in local groundwater wells.

### **RHC LPOE**

Similar to the Commercial LPOE, short-term, minor, adverse, and indirect impacts would occur to surface waters and groundwater from increased potential for erosion and spills during construction activities related to the expansion and modernization of the RHC LPOE. Construction at the RHC LPOE would also adhere to the terms of the Arizona Stormwater CGP and City of Douglas Permit, similar as described for the Commercial LPOE. Groundwater is not anticipated to be encountered during construction based on historical levels of groundwater at nearby wells (i.e., 122.3 feet measured at the most proximate well). Overall impacts at the RHC LPOE would be comparatively lower than the Commercial LPOE as there would be fewer acres disturbed (i.e., approximately 8.8 acres at the RHC LPOE under Alternative 1 compared to 80.5 acres at the Commercial LPOE).

Long-term, minor, adverse, direct and indirect impacts could arise due to construction within a designated 100- or 500-year floodplain. Existing and proposed facilities at the RHC LPOE would be located within the 100- and 500-year floodplain. Approximately 0.07 acre of existing port property is within the 100-year floodplain and 4.98 acres (including the separate parking area) are within the 500-year floodplain. An additional 2.04 acres in the Alternative 1 Expansion Area are located in the 500-year floodplain. The additions of new structures or impervious surfaces in such areas could reduce the floodplain's capacity to store water, depending on final design and configuration of the RHC LPOE, or may result in the potential to expand the floodplain, thus increasing the spread or intensity of a flood event.

Final design of the RHC LPOE would incorporate standard measures, including those specified in P100 Standards, to reduce or manage stormwater flows and thus impacts to the floodplain and from flooding on the facility's buildings. This would include reviewing plans for the structure to be in compliance with FEMA National Flood Insurance Program's Building Standards requirements for nonresidential structures, which require elevating the lowest floor to or above the base flood level. In accordance with EO 11988, *Floodplain Management*, GSA would follow the eight-step decision making process for floodplain management outlined in 44 CFR 9.6. As a result, GSA prepared a Floodplain Assessment and issued a Statement of Findings (see Appendix D). Per the GSA Floodplain Desk Guide, the Proposed Action would qualify as a "critical" action, meaning that a local flooding event could lead to regional or national catastrophic impacts (GSA 2019b). As such, the minimum floodplain of concern for critical actions is the 500-year floodplain (also known as the critical action floodplain). In addition, GSA would obtain any necessary development permits through the Arizona Stormwater CGP regarding construction within a 100-year floodplain. There is a low probability of a flood event occurring in the 500-year floodplain; such areas are defined as having a 0.2 percent annual chance flood hazard or areas of 1 percent annual chance flood with average depth less than 1 foot or with drainage areas of less than 1 square mile.

In accordance with Section 438 of the EISA, GSA would use site planning, design, construction, and maintenance strategies for the property to maintain or restore, to the maximum extent technically feasible,

the predevelopment hydrology of the property with regard to the temperature, rate, volume, and duration of flow. Such measures would be incorporated into design of the expanded RHC LPOE.

Water used for construction would be either be trucked in or hooked up to nearby connections. If nearby connections are utilized, this would be accommodated by the existing capacity of the city's potable water system, which is supplied via groundwater. This would result in short-term, minor, direct adverse impacts to the regional water supply and indirect impacts as it contributes to the overall declining trend of water levels in local groundwater wells. Refer to Section 3.10, Infrastructure and Utilities and Chapter 4 for more discussion.

As stated in Section 3.6.1, approximately 215 feet of stream segment associated with a seasonally flooded drainage feature occur within the existing RHC LPOE property, and another 305 feet occur within the Alternative 1 Expansion Area. These segments may be considered a WOTUS in the bed and bank sections, as they appear to drain ultimately to the Whitewater Draw. It is expected that these features would be mostly or entirely avoided during construction and appropriate BMPs to prevent sedimentation would be placed to prevent runoff and sediments from entering this feature. In addition, approximately 500 feet of mapped riverine features located within the project area are associated with a concrete lined stormwater channel and may also be considered WOTUS. In the event of any encroachment resulting in fill of any WOTUS, coordination with the USACE would be required, to include a jurisdictional determination, subsequent permitting or, at a minimum, a pre-construction notification. Generally, for disturbances of less than 0.1 acre of WOTUS, only pre-construction notification is required.

## **Operations**

### ***Commercial LPOE***

Alternative 1 would result in long-term, minor, adverse, indirect impacts to water resources due to long-term increases in stormwater runoff and long-term decreases in groundwater recharge. Under Alternative 1, there would be an increase of up to 80.5 acres of impervious surfaces at the Commercial LPOE site. This could increase the volume of stormwater runoff from the site and associated sedimentation that enters surrounding waterways, including the Whitewater Draw. Stormwater management measures are subject to final design but may include use of drain inlets to storm drains, which would lead to a bioretention basin system where stormwater would percolate into the ground. See Section 3.6.2.6 for a discussion of measures that could further reduce or avoid potential impacts.

Operation of the Commercial LPOE would also introduce the potential for spills of POL or hazardous materials from operations at the new port and COV traffic routed through new areas. Spill control measures would be utilized when necessary, and spill control kits would be readily available for use at all locations where heavy equipment would be utilized (see Section 3.13, Human Health and Safety for further discussion of potential releases of POL and hazardous materials).

Under a separate action, the City of Douglas plans to drill a groundwater well and construct a storage tank and water lines to support potential development in the area near the proposed Commercial LPOE, to include potential construction of the Commercial LPOE (refer to Chapter 4, Cumulative Impacts). Development of any new groundwater wells by the city would be subject to the Douglas AMA requirements regarding well withdrawals. During operations, the Commercial LPOE would utilize water drawn from the new groundwater well. The demand for potable water during operations of the Commercial LPOE would increase overall usage in the regional water supply, but it is expected that this demand would be accommodated by the capacity of the new groundwater well (Stantec 2022). It is estimated that the overall project would result in approximately 200 additional new workers (of which 100 workers would be located at the proposed Commercial LPOE) and could result in an incremental increase of 3 acre-feet per year in water demand based on recent usage rates at the existing RHC LPOE. This represents less than 0.01 percent of the total demand on the Douglas Groundwater Basin (last recorded in 2014). The projected water demand could be reduced from the current usage rate as the proposed Commercial LPOE would be constructed to

achieve LEED certification with Gold-level standards at a minimum and may integrate Water Conservation Measures (WCMs), such as low-flow fixtures inside its facilities and designing a stormwater collection system that could be used for irrigation. These features would potentially reduce the water supply requirements of the project. Further, GSA would adhere to any requirements passed along by the water supplier as a result of any AMA requirements. The direct adverse impact of the Commercial LPOE withdrawing additional volumes of groundwater from the aquifer is expected to be minor but would contribute to the overall declining trend of water levels in local groundwater wells. Refer to Chapter 4 for more discussion on cumulative impacts on the regional water supply.

### **RHC LPOE**

Operations at the RHC LPOE under Alternative 1 would result in long-term, negligible to minor, adverse, and indirect impacts to water resources since operations would be generally consistent with current activities. There would be a slight increase in impervious surfaces of up to 0.4 acre with the conversion of existing city park and adjacent vacant land in the Alternative 1 Expansion Area, which could result in a slight increase in stormwater runoff from the site. Indirect impacts from sedimentation or potential contamination from spills would be similar to as described for the proposed Commercial LPOE. Similar to the Commercial LPOE, stormwater management measures are subject to final design but may include use of drain inlets to storm drains, which would lead to a bioretention basin system where stormwater would percolate into the ground.

The proposed increase in personnel operating the RHC LPOE would result in increased demand for potable water from the City of Douglas. It is estimated that the overall project would result in approximately 200 additional new workers (of which 100 workers would be located at the RHC LPOE) and could result in an incremental increase of 3 acre-feet per year in water demand based on recent usage rates at the existing RHC LPOE. This represents less than 0.01 percent of the total demand on the Douglas Groundwater Basin (last recorded in 2014). The projected water demand could be reduced from current rates as the new facilities at the RHC LPOE would be constructed to achieve LEED certification with Gold-level standards at a minimum and may integrate WCMs. These features would potentially reduce the water supply requirements of the project. The water demand at the RHC LPOE, drawn from groundwater, would be accommodated by the existing capacity of the city's potable water system but would result in a minor adverse impact to the regional water supply as it contributes to the overall declining trend of water levels in local groundwater wells. Refer to Section 3.10, Infrastructure and Utilities and Chapter 4 for more discussion on the potential impacts to the City of Douglas's existing water utility system and the regional water supply, respectively.

### **Alternatives 1a – 1d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 1a through 1d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.1.2.1. As these sub-alternatives would take place within the footprint of the RHC LPOE, the potential impacts to water resources as already identified under Alternative 1 would not change.

#### **3.6.2.4 Alternative 2 – Concurrent Construction (Westward Expansion)**

Construction of the proposed Commercial LPOE and RHC LPOE under Alternative 2 would result in short-term, minor, adverse, and indirect impacts to surface waters; and short-term, minor adverse impacts to groundwater. Construction at the RHC LPOE would also result in long-term, minor, adverse, direct and indirect impacts to floodplains.

Operations of Alternative 2 would result in long-term, minor, adverse, and indirect impacts to surface waters and groundwater at both the proposed Commercial LPOE and RHC LPOE.

## **Construction**

Impacts during construction of Alternative 2 would be similar to as described for Alternative 1 for both the proposed Commercial LPOE and RHC LPOE, including the Alternative 1 Expansion Area. There would be short-term, minor, adverse, and indirect impacts similar to as discussed in Alternative 1, although impacts would be slightly larger in magnitude and more short-term as construction at both locations would occur at the same time.

At the existing RHC LPOE, the new facility footprint would expand to the property west of Pan American Avenue (i.e., the Alternative 2 Expansion Area), which would result in up to an additional 13.9 acres of ground disturbance, to potentially include construction staging areas. Approximately 0.7 acre of 100-year floodplain occurs within the project area for Alternative 2 and follows the regulatory floodway flowing west of Pan American Avenue and across the southern portion of the RHC LPOE site (see Figure 3.6-3). This total includes approximately 0.07 acre within the existing RHC LPOE property and approximately 0.63 acre within the Alternative 2 Expansion Area. In addition to the acreages described for Alternative 1, approximately 1.1 acres of the Alternative 2 Expansion Area are within the 500-year floodplain for a total of approximately 8.12 acres in the project area for Alternative 2. The addition of any impervious surfaces and land use change could cause changes to the existing floodplains and exacerbate flooding issues. Stormwater measures and standard measures to reduce or minimize the impacts to the floodplain and from flooding would be implemented, similar to Alternative 1. GSA would also be subject to the same requirements as described for Alternative 1 for development in the floodplain (see Appendix D). Similar to Alternative 1, impacts would be long-term, minor, adverse, direct and indirect.

In addition to the 520 feet of seasonally flooded drainage features discussed for Alternative 1, another 35 feet occur within the Alternative 2 Expansion Area as discussed in Section 3.6.1. In addition to the 500 linear feet of riverine features located within existing RHC LPOE and Alternative 1 Expansion Area that are associated with a concrete lined stormwater channel, another 870 linear feet of this same feature are located within the Alternative 2 Expansion Area. These features may be considered WOTUS and would be subject to the same regulatory requirements as described for Alternative 1. Similar to Alternative 1, short-term, minor, adverse, and indirect impacts to downstream surface waters could occur due to increased potential for sedimentation and contamination from construction site runoff, as well as increased potential for spills of petroleum products or other hazardous materials stored onsite during construction. GSA would employ appropriate BMPs to prevent sedimentation within nearby surface water features.

GSA may, instead, acquire temporary easements from the city for construction laydown areas for staging of heavy construction equipment. The use of temporary easements could result in fewer impacts to surrounding waterways within the and RHC LPOE if the temporary easements are located away from existing surface water features. Any newly disturbed areas used for construction laydown would be returned to existing conditions post construction activities. Final plans for land acquisition and any use of temporary easements would be determined during the design process for the RHC LPOE.

## **Operations**

Impacts during operations of the Commercial LPOE and RHC LPOE under Alternative 2 would be similar as described for Alternative 1; however, because the Alternative 2 Expansion Area is greater in acreage, the extent and intensity of potential adverse impacts would be greater. Alternative 2 could result in up to 13.9 acres more in impervious surface area than Alternative 1 in the event the entire Alternative 2 Expansion Area is developed (for a total of 14.3 acres considering the Alternative 1 Expansion Area). An increase in impervious area would result in greater runoff and potential for water quality degradation due to erosion and sedimentation downstream, resulting in long-term, minor, adverse, and indirect impacts to surface waters.



### **Alternatives 2a – 2d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 2a through 2d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.2.1. As these sub-alternatives would take place within the footprint of the RHC LPOE, the potential impacts to water resources as already identified under Alternative 2 would not change.

#### **3.6.2.5 Alternative 3 – Concurrent Construction (Eastward Expansion)**

Construction of the proposed Commercial LPOE and RHC LPOE under Alternative 3 would result in short-term, minor, adverse, and indirect impacts to surface waters; and short-term, minor adverse impacts to groundwater. Construction at the RHC LPOE would also result in long-term, minor, adverse, direct and indirect impacts to floodplains.

Operations of Alternative 3 would result in long-term, minor, adverse, and indirect impacts to surface waters and groundwater at both the proposed Commercial LPOE and RHC LPOE.

#### **Construction**

Impacts during construction of Alternative 3 would be similar to as described for Alternative 1 for both the proposed Commercial LPOE and RHC LPOE, including the Alternative 1 Expansion Area. There would be short-term, minor, adverse, and indirect impacts similar to as discussed in Alternative 1, although impacts would be slightly larger in magnitude and more short-term as construction at both locations would occur at the same time.

At the existing RHC LPOE, the new facility footprint would expand to the property east of Customs Avenue (i.e., the Alternative 3 Expansion Area), which would result in up to an additional 4.4 acres of ground disturbance. In addition to the acreages described for Alternative 1, approximately 0.46 acre of the Alternative 3 Expansion Area is within the 100-year floodplain, and 3.91 acres are within the 500-year floodplain; hence, the entire project area for Alternative 3 would include 0.53 acre of 100-year floodplain and 10.93 acres of 500-year floodplain. Much of the Alternative 3 Expansion Area is developed with existing buildings, structures, paved surfaces, and compacted soils from prior uses that have resulted in impervious surfaces. Approximately 1.8 acres are open, undeveloped land; but more than half of that area has been cleared, graded, and compacted for use as a graveled parking lot. Thus, less than an acre of the entire Alternative 3 Expansion Area has land that contains vegetation and is not impervious. However, any addition of impervious surfaces could cause changes to the existing floodplains and exacerbate flooding issues. Measures implemented to reduce or minimize the impacts to the floodplain and from flooding would be similar to Alternative 1, and GSA would be subject to the same requirements for development in the floodplain (see Appendix D). Similar to Alternative 1, impacts would be long-term, minor, adverse, direct and indirect.

In addition to the 500 linear feet of riverine features located within existing RHC LPOE and Alternative 1 Expansion Area that are associated with a concrete lined stormwater channel, another 460 linear feet of this same feature are located within the Alternative 3 Expansion Area. These features may be considered WOTUS and would be subject to the same regulatory requirements as described for Alternative 1. These features are not anticipated to be WOTUS.

Like Alternative 1, short-term, minor, adverse, and indirect impacts to downstream surface waters could occur due to increased potential for sedimentation and contamination from construction site runoff, as well as increased potential for spills of petroleum products or other hazardous materials stored onsite during construction.

#### **Operations**

Impacts during operations of the Commercial LPOE and RHC LPOE under Alternative 3 would be similar to as described for Alternative 1; however, because the Alternative 3 Expansion Area is greater in acreage, the extent and intensity of potential adverse impacts would be greater. As described above for Construction,

much of the Alternative 3 Expansion Area has been cleared, graded, paved, or built upon and is already characterized by impervious surfaces. Conservatively, it is assumed that up to 1.4 additional acres of impervious surfaces could be added under Alternative 3, to include impervious surfaces added in the Alternative 1 Expansion Area. Any increase in impervious surface area would result in greater runoff and potential for water quality degradation due to erosion and sedimentation downstream, resulting in long-term, minor, adverse, and indirect impacts to surface waters.

### **Alternatives 3a – 3d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 3a through 3d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.2.1. As these sub-alternatives would take place within the footprint of the RHC LPOE, the potential impacts to water resources as already identified under Alternative 3 would not change.

#### **3.6.2.6 Impact Reduction Measures**

GSA requires that new construction and substantial renovation of its facilities obtain a LEED Gold certification (GSA 2021). The LEED certification for the project is based on an accumulation of several scored green building features that may include WCMs such as low-flow fixtures (interior) and installing a retention system to collect stormwater outflow for irrigation (exterior). These features potentially reduce the water supply requirements of the Project and improve the surface water quality for any water that leaves the property. In addition, GSA requires a minimum Sustainable Sites Initiative (SITES) silver rating. Regarding water, all major capital projects with a scope of site work exceeding 5,000 square feet such meet the equivalent of the following SITES certification credits (GSA 2021):

- SITES credit 3.3, “Manage Precipitation Beyond Baseline” with the goal to capture and manage the equivalent of the 95<sup>th</sup> percentile precipitation event.
- SITES credit 3.2, “Reduce Water Use for Landscape Irrigation” with the goal of protecting and conserving water.

GSA would follow the impact reduction measures and BMPs outlined within the Arizona Stormwater CGP and the Cochise County Stormwater Ordinance (Ordinance No. 049-18) (Cochise County 2018b). The latter requires the submittal of a post-construction stormwater management plan and an Operation and Maintenance Plan simultaneously with a Stormwater Site Plan. The Cochise County Flood Control District may require on-site stormwater retention/detention and off-site stormwater drainage.

GSA would coordinate with USACE as applicable with respect to potential impacts to WOTUS, to include determining possible permitting requirements.

## 3.7 BIOLOGICAL RESOURCES

This section describes the baseline conditions for biological resources in the project area and potential impacts that could result from implementing the Proposed Action, including the alternatives as discussed in Chapter 2. The biological resources that have been identified for consideration in this EIS are vegetation, wildlife, special status species (including federally listed endangered and threatened species and species of greatest conservation need as identified in the Arizona State Wildlife Action Plan [2012]), and migratory birds.

### 3.7.1 Affected Environment

#### 3.7.1.1 *Region of Influence*

The ROI for biological resources includes vegetation, wildlife, and special status species within 1,000 feet of the current RHC LPOE, the expansion areas, and the proposed Commercial LPOE site.

#### 3.7.1.2 *Regulatory Setting and Requirements*

**Endangered Species Act.** The ESA (16 USC 1531 *et seq.*) establishes a national policy for conserving threatened and endangered species of fish, wildlife, and plants, and the habitat on which they depend. Under Section 3 of the ESA:

- An endangered species is defined as any species in danger of extinction throughout all or a significant portion of its range.
- A threatened species is any species likely to become an endangered species within the near future throughout all or a significant portion of its range.
- A proposed species is a species found to warrant listing as either threatened or endangered, and for which listing has been officially proposed in the *Federal Register*.
- A candidate species is any species that has been announced in the *Federal Register* as undergoing a status review but has not yet been listed. Candidate species do not receive federal protection under the ESA until officially listed as a threatened or endangered species.

Critical habitat for federally listed threatened and endangered species is a specific geographic area (or areas) that contain physical or biological features essential to the conservation of the threatened or endangered species and may require management or protection.

Under Section 7 of the ESA, federal agencies must consult with the USFWS when any action the agency carries out, funds, or authorizes may affect either a species listed as threatened or endangered under the ESA, or any critical habitat designated for it.

The Arizona Game and Fish Department identifies species of greatest conservation concern within the Arizona State Wildlife Action Plan (2012). The species designated as Tier 1A species under this plan reflect the department's highest commitments and priorities and include those ranked as "vulnerable" in at least one of eight categories and that are protected under or a candidate for the ESA; covered under a signed conservation agreement meeting; or designated as a closed season species (i.e., no take permitted) by an Arizona Game and Fish Commission Order.

**Bald and Golden Eagle Protection Act.** The Bald and Golden Eagle Protection Act (BGEPA) prohibits taking without a permit, or taking with wanton disregard any bald or golden eagle or their body parts, nests, chicks, or eggs, which includes collection, molestation, disturbance, or killing. The BGEPA protections include provisions such as the protection of unoccupied nests and prohibition on disturbing eagles. The BGEPA includes limited exceptions to its prohibitions through a permitting process, including exceptions to take bald or golden eagle nests that interfere with resource development or recovery operations.

Coordination with USFWS would be required to assess impact and develop avoidance and minimization measures to limit adverse impacts on eagles.

**Migratory Bird Treaty Act.** The Migratory Bird Treaty Act (16 USC 703 *et seq.*) protects birds that have common migration patterns between the U.S. and Canada, Mexico, Japan, and Russia. The Migratory Bird Treaty Act makes it unlawful to pursue, hunt, take, capture, kill, or sell birds (including any parts, dead or alive, feathers, eggs, and nests) that are listed in the statute. Currently there are over 800 species on the list nationwide.

### 3.7.1.3 Existing Conditions

Due to the proximity of the two project areas and similarity in habitat within the overall landscape, this section discusses general affected environment for both the RHC LPOE and the proposed Commercial LPOE. Where there are differences between the sites requiring distinction between the two locations, these are highlighted in the text as appropriate.

#### Vegetation

The ROI is located in the Madrean Archipelago ecoregion, which is characterized by areas of desert scrub and semi-desert grasslands that form a desert “sea” around mountains known as “sky islands” (Griffith et al. 2014). This region is also known as the Apache Highlands (Marshall et al. 2004). Figure 3.7-1 and Figure 3.7-2 present representative photographs of the existing desert scrub and grassland vegetation within the ROI; these photographs were taken at the two project areas during a site reconnaissance conducted in August 2022 (EcoPlan Associates, Inc. 2022). Vegetation communities are typical of the semidesert grasslands and scrub consisting of short grasses intermingled with a variety of large, well-spaced scrub-shrub perennials. Perennial grasses commonly found include black grama (*Bouteloua eriopoda*) and other grama species (*Bouteloua* spp.). Sotols (*Dasylyrion* spp.), agaves (*Agave* spp.), yuccas (*Yucca* spp.), and beargrasses (*Nolina* spp.) may also be found. Dominant scrub-shrub species can include mesquite (*Prosopis* spp.), one seed juniper (*Juniperus monosperma*), grayhorn (*Zizyphus obtusifolia*, *Condalia pathulate*), and Mormon or Mexican tea (*Ephedra trifurca*, *E. antisiphilitica*). Various cactus species are common. Important species include barrel cactus (*Ferocactus wislizenii*), cane cholla and prickly pears (*Opuntia* spp.), and pincushions (*Mammillaria* spp.) (USEPA 2014).

Invasive plants were identified within the ROI during a site reconnaissance conducted in August 2022. These included Russian thistle (*Salsola* spp.), Johnson grass (*Sorghum halapense*), tree of heaven (*Ailanthus altissima*), Bermuda grass (*Cynodon dactylon*), and puncture vine (*Tribulus terrestris*) (EcoPlan Associates, Inc. 2022).

#### Wildlife

Typical wildlife species found in the semidesert grassland include small mammals such as black-tailed jack rabbit (*Lepus californicus*); spotted ground squirrel (*Spermophilus pilosoma*); Ords, banner-tailed, and Merriam’s kangaroo rats (*Dipodomys ordii*, *D. spectabilis*, *D. merriami*); badger (*Taxidea taxus*); and coyote (*Canis latrans*). Common birds of the semidesert grassland include Swainson’s hawk (*Buteo swainsoni*); prairie falcon (*Falco mexicanus*); mourning dove (*Zenaida macroura*); scaled quail (*Callipepla squamata*); road runner (*Geococcyx californianus*); loggerhead shrike (*Lanius ludovicianus*); and meadow lark (*Sturnella magna*) (USEPA 2014).

Herpetofauna are more prevalent than mammals in the Chihuahuan desert scrub community bordering the semidesert grassland. Typical species include the Texas banded gecko (*Coleonyx brevis*); roundtail horned lizard (*Phrynosoma modestum*); spiny lizards (*Sceloporus* sp.); trans-Pecos ratsnake (*Elaphe subocularis*); western hooknose snake (*Ficimia cana*); and Mohave rattlesnake (*Crotalus scrutulatus*) (USEPA 2014).



**Figure 3.7-1. Representative Photograph of Vegetation at RHC LPOE Westward Expansion Area**



**Figure 3.7-2. Representative Photograph of Vegetation at Proposed Commercial LPOE**

## **Special Status Species**

The Information, Planning, and Consultation System (IPaC), maintained by the USFWS, was queried for federally listed threatened and endangered species and designated critical habitats potentially occurring within the ROI. The species list generated by the database search includes a total of six federally threatened or endangered species (as shown in Table 3.7-1): one mammal, one bird, one reptile, one amphibian, and two fish (USFWS 2022a). USFWS has designated critical habitat for all six of these species; however, no critical habitat for any of these listed species occurs within the ROI. A team of local biological resources specialists also surveyed the Alternative 1 and 2 Expansion Areas in August 2022 for presence of federally protected species but did not observe any of the species listed on the IPaC report for the ROI (EcoPlan Associates, Inc. 2022). The reconnaissance considered the presence of travel, dispersal, and migration habitat in the project area for these species. Although not included in the biological reconnaissance for Alternatives 1 and 2, the Alternative 3 Expansion Area consists mainly of developed lands east of Customs Avenue that contain buildings, other structures, paved surfaces, and limited vacant lands that have been disturbed during prior uses. Table 3.7-1 includes a brief assessment of each species' likelihood of occurrence in the ROI based on the species' range/distribution, habitat requirements, and the results of the reconnaissance.

Table 3.7-2 lists the Tier 1A species of greatest conservation need identified in the Arizona State Wildlife Action Plan (2012) that have potential to be found within the ROI, summary of general habitat requirements, and brief assessment of each species' likelihood of occurrence in the ROI based on the species' range/distribution and habitat requirements.

Species with the potential to occur with the ROI are discussed in Section 3.7.2.

## **Migratory Birds**

A site reconnaissance identified native and landscape trees near the RHC LPOE that could support nesting migratory birds. Per the USFWS IPaC results (2022), no migratory birds of conservation concern are expected to occur within the ROI. It is more likely that migrating species may pass through the area on the way to other stopover, foraging, or breeding habitat.

## **3.7.2 Environmental Consequences**

### **3.7.2.1 Methodology**

To evaluate the impacts on biological resources, GSA reviewed the project alternatives to determine whether any activities have the potential to cause the following within the ROI:

- Displacement of terrestrial or aquatic communities or loss of habitat;
- Diminished value of habitat for wildlife, plants, or aquatic species;
- Interference with the movement of native resident or migratory wildlife species;
- Conflict with management plans for terrestrial, avian, and aquatic species and their habitat;
- Introduction of noxious or invasive plant species;
- Decline in native fish populations;
- Impacts on or displacement of endangered, threatened, or other protected status species; or
- Encroachment or impacts on designated critical habitat for a federally listed species.

A significant adverse impact to biological resources would occur if the Proposed Action would result in:

- Long-term loss, degradation, or loss of diversity within unique or high-quality plant communities;

- Unpermitted “take” of federally listed species;
- Local extirpation of rare or sensitive species not currently listed under the ESA;
- Unacceptable loss of critical habitat, as determined by the USFWS; or
- Violation of the Migratory Bird Treaty Act or BGEPA.

**Table 3.7-1. Federally Threatened and Endangered Species with Potential to Occur within ROI**

Species	Federal Status	Habitat	Expected to Occur Within?	
			RHC LPOE	Commercial LPOE
Jaguar ( <i>Panthera onca</i> )	Endangered	Ranges from tropical forests, lowland scrub and woodland, thorn scrub, desert, swampy savanna, mangrove swamps and marshland. Feeds on large and small mammals, reptiles, and ground nesting birds.	Unlikely. Jaguars can occupy a variety of habitats and are known to pass through areas close to the U.S.-Mexico border on rare occasions. However, the border fence between the U.S. and Mexico impedes movement of this species, and jaguars are much more likely to be found in secluded areas with cover away from human activity. The proximity of the town of Douglas, human activity, and associated development make it unlikely to encounter a jaguar within the ROI. A review of the Jaguar Observation Database ( <a href="https://jaguardata.info/">https://jaguardata.info/</a> , USFWS and Wildlife Conservation Society) identified no observations of jaguars within 20 miles of the project areas. The nearest sightings have been in the Chiricahua Mountains to the north.	
Yellow-billed cuckoo ( <i>Coccyzus americanus</i> )	Threatened	Migratory species; Arizona within breeding range. Nests in deciduous woodlands, moist tickets, orchards, and overgrown pastures.	Unlikely. This species is generally associated with riparian habitats and builds nests in trees along rivers in the western U.S. The lack of riparian habitat within the ROI makes it unlikely to encounter this species. However, this species is migratory, and it remains possible that individuals may pass through the ROI, stopping to rest or forage.	
Northern Mexican garter snake ( <i>Thamnophis eques magalops</i> )	Threatened	Species strongly associated with permanent water with vegetation (e.g., stock tanks, ponds, lakes, riparian woods, etc.).	No. The ROI only contains unnamed ephemeral streams that are dry most of the year.	
Chiricahua leopard frog ( <i>Rana chiricahuensis</i> )	Threatened	Springs, pools, lakes, reservoirs, streams, and rivers.	No. Per informal consultation with the USFWS dated December 16, 2022 (see Appendix B), the most proximate known location for this species is located 2 miles from the proposed Commercial LPOE site. While this is located within potential dispersal distance, there is no suitable dispersal habitat to connect the known location to the project site, and this species has not been recently detected within the ROI. The connecting habitat is occupied by invasive bullfrogs and therefore unusable by Chiricahua leopard frogs. There is no potential for these frogs to be present during project activities. A copy of USFWS correspondence with these findings is included in Appendix B.	
Yaqui catfish ( <i>Ictalurus pricei</i> )	Threatened	Small to medium rivers with medium to slow currents over gravel/sand substrates.	No. The ROI only contains unnamed ephemeral streams that are dry most of the year.	



**Table 3.7-1. Federally Threatened and Endangered Species with Potential to Occur within ROI**

Species	Federal Status	Habitat	Expected to Occur Within?	
			RHC LPOE	Commercial LPOE
Yaqui chub ( <i>Gila purpurea</i> )	Endangered	Deep pools in creeks, springheads, and other stream-associated quiet waters.	No. The ROI only contains unnamed ephemeral streams that are dry most of the year.	

Source: USFWS 2022a; EcoPlan Associates, Inc. 2022

LPOE = Land Point of Entry; RHC LPOE = Raul Hector Castro Land Point of Entry; ROI = Region of Influence; USFWS = United States Fish and wildlife Service

Note: IPaC identified two additional species within the ROI: northern Aplomado falcon (*Falco femoralis septentrionalis*; experimental or non-essential), and Wright’s marsh thistle (*Cirsium wrightii*; proposed threatened). However, species do not receive full protection under the Endangered Species Act until officially listed as threatened or endangered. Candidate, proposed, or experimental populations are not considered further within this EIS.

**Table 3.7-2. Arizona Species of Greatest Conservation Need with the Potential to Occur within the ROI**

Species	Habitat	Expected to Occur Within?	
		RHC LPOE	Commercial LPOE
Jaguar ( <i>Panthera onca</i> )	Ranges from tropical forests, lowland scrub and woodland, thorn scrub, desert, swampy savanna, mangrove swamps and marshland. Feeds on large and small mammals, reptiles, and ground-nesting birds.	Unlikely. Jaguars can occupy a variety of habitats and are known to pass through areas close to the U.S.-Mexico border on rare occasions. However, the border fence between the U.S. and Mexico impedes movement of this species, and jaguars are much more likely to be found in secluded areas with cover away from human activity. The proximity of the town of Douglas, human activity, and associated development make it unlikely to encounter a jaguar within the ROI. A review of the Jaguar Observation Database ( <a href="https://jaguardata.info/">https://jaguardata.info/</a> , USFWS and Wildlife Conservation Society) identified no observations of jaguars within 20 miles of the project areas. The nearest sightings have been in the Chiricahua Mountains to the north.	
Lesser long-nosed bat ( <i>Leptonycteris yerbabuena</i> )	Roosts in old mines and caves at the base of mountains near alluvial fans vegetated with agave, yucca, saguaro, and organ pipe cactus.	Unlikely. This species may forage on the nectar and pollen of agave, saguaro, and organ pipe cactus. While the semidesert grassland habitat found within the ROI does support agaves and some cactus species; saguaro and organ pipe cactus are not listed as being primary species of this habitat. Therefore, the ROI is not expected to represent a high-quality foraging area.	
Mexican gray wolf ( <i>Canis lupus baileyi</i> )	Not associated with a particular habitat, but species occurs where human population density and persecution level are low and prey densities are high.	Unlikely. While the ROI exists within this species’ range, wolves tend to avoid areas of increased human activity.	

**Table 3.7-2. Arizona Species of Greatest Conservation Need with the Potential to Occur within the ROI**

Species	Habitat	Expected to Occur Within?	
		RHC LPOE	Commercial LPOE
American peregrine falcon ( <i>Falco peregrinus anatum</i> )	Various open habitats. Nests in places with a wide view and near water.	Possible. ROI is within species range.	
Mexican spotted owl ( <i>Strix occidentalis lucida</i> )	Most commonly found in mixed conifer, pine-oak, and evergreen oak forest. Also occur in ponderosa pine forest and rocky canyonlands.	Unlikely. While the ROI exists within this species' range, it does not support the species' preferred forest habitat.	
Northern Aplomado falcon ( <i>Falco femoralis septentrionalis</i> )	Coastal prairies along sand ridges, woodlands along desert streams, and desert grasslands with scattered mesquite and yucca.	Possible. Potentially suitable grassland habitat may exist within the ROI.	
Sprague's pipit ( <i>Anthus spragueii</i> )	Pastures and weedy fields, including grasslands with dense herbaceous vegetation or grassy agricultural fields.	Possible. Potentially suitable grassland habitat may exist within the ROI.	
Western yellow-billed cuckoo ( <i>Coccyzus americanus occidentalis</i> )	Breeding habitat generally found in deciduous riparian woodland, especially with dense stands of cottonwood and willow.	Unlikely. This species is generally associated with riparian habitats and builds nests in trees along rivers in the western U.S. The lack of riparian habitat within the ROI makes it unlikely to encounter this species. However, this species is migratory, and it remains possible that individuals may pass through the ROI, stopping to rest or forage.	
Gila monster ( <i>Heloderma suspectum</i> )	Desert grassland, desert scrub, and thorn scrub. Also found in canyon bottoms, arroyos, and rocky slopes. In southern Arizona, more abundant in wetter and rockier areas than drier and sandier areas. May spend 98% of the year underground.	Possible. Potentially suitable grassland habitat may exist within the ROI.	
Massasauga ( <i>Sistrurus catenatus tergeminus</i> )	Grassland areas, on the edge of open woodland, or on rocky hillsides.	Possible. Potentially suitable grassland habitat may exist within the ROI.	
Milksnake ( <i>Lampropeltis triangulum gentilis</i> )	Wide range of habitats from semiarid to wet, lowland valleys to mountains, grasslands and shrublands to wooded areas, sand dunes to rocky areas, and wilderness to semiagricultural and suburban.	Possible. Potentially suitable grassland habitat may exist within the ROI.	

**Table 3.7-2. Arizona Species of Greatest Conservation Need with the Potential to Occur within the ROI**

Species	Habitat	Expected to Occur Within?	
		RHC LPOE	Commercial LPOE
Rock rattlesnake ( <i>Crotalus lepidus</i> )	Rocky mountainous areas, often in arid or semiarid areas vegetated with pine-oak, oak-juniper, pinyon pine, ponderosa pine, or agave-shrub. Also inhabits mesquite grasslands and rocky desert flats and canyons.	Possible. Potentially suitable grassland habitat may exist within the ROI.	
Twin-spotted rattlesnake ( <i>Crotalus pricei</i> )	Pine-oak woodland, grassy and brushy areas, and open coniferous forest, usually on well-lit rocky slopes.	Possible. Potentially suitable grassland habitat may exist within the ROI.	

Source: Arizona Game and Fish Department 2012; Arizona Game and Fish Department 2022; NatureServe 2022a; USFWS 2022a

ROI = Region of Influence

Notes: 1 – Refer to Table 3.7-3 for discussion of impacts to species with potential to occur within the ROI.

2 – This table lists the Tier 1A Arizona species of greatest conservation need with the potential to occur within the ROI. Species for which no suitable habitat exists within the ROI were excluded from consideration within this EIS. For example, Tier 1A fish species are not listed in this table because there are no surface waters present within the ROI. Other species have ranges that overlap the ROI, but specific habitat requirements are not present within the ROI were similarly dismissed from consideration.

3 – The Hualapai Mexican vole (*Microtus mexicanus hualpaiensis*) has been removed from this table as it was found to have no genetic difference from other vole subspecies in Arizona. The populations previously identified as this subspecies are now recognized as Mexican voles (*Microtus mexicanus*); this species has not been identified as a species of greatest conservation need in the state of Arizona.

### 3.7.2.2 No Action Alternative

Under the No Action Alternative, GSA would not construct a new Commercial LPOE or expand and modernize the RHC LPOE. Therefore, there would be negligible, indirect adverse impacts on biological resources from ongoing operations of the RHC LPOE. Land and vegetation disturbance would not occur.

### 3.7.2.3 Alternatives 1, 2, and 3 – Special Status Species

Table 3.7-3 summarizes the potential direct and indirect effects to protected species that have potential to occur within the project areas for Alternatives 1, 2, or 3. For species that have no potential to occur, no effects are anticipated.

**Table 3.7-3. Potential Effects to Special Status Species**

Species	Status	Potential Impact Rating	Potential Impact Summary
Jaguar ( <i>Panthera onca</i> )	Federally endangered	May affect, not likely to adversely affect	The Proposed Action may affect, but is not likely to adversely affect this species. While this species is known to pass through areas close to the U.S.-Mexico border, the border fence and the presence of human activity makes it unlikely to encounter jaguars in the ROI, and construction or operation of the Proposed Action would not reduce the overall amount of available suitable habitat. In addition, no jaguars have been observed within 20 miles of the RHC LPOE.
Western yellow-billed cuckoo ( <i>Coccyzus americanus</i> )	Federally threatened	May affect, not likely to adversely affect	The Proposed Action may affect, but is not likely to adversely affect this species. Due to lack of suitable nesting habitat, this species is not expected to reside within the ROI. However, non-resident species may still move through the area. The yellow-billed cuckoo may migrate through the ROI and stop to rest or forage. However, construction and operation of the Proposed Action would not reduce the overall availability of nesting habitat or high-quality foraging habitat.
Lesser long-nosed bat ( <i>Leptonycteris yerbabuunae</i> )	Arizona species of greatest conservation need	Negligible	The Proposed Action is unlikely to adversely affect this species. Due to the limited availability of suitable food sources, construction and operation of the Proposed Action is not expected to reduce the overall availability of high-quality foraging habitat for this species.
Mexican gray wolf ( <i>Canis lupus baileyi</i> )	Arizona species of greatest conservation need	Negligible	The Proposed Action is unlikely to adversely affect this species. While the ROI exists within this species' range, the presence of human activity makes it unlikely that this species may be encountered within the ROI. As such, construction and operation would not likely reduce the overall amount of available suitable habitat.
Mexican spotted owl ( <i>Strix occidentalis lucida</i> )	Arizona species of greatest conservation need	Negligible	The Proposed Action is unlikely to adversely affect this species. While the ROI exists within this species' range, the area lacks the preferred forested habitat. As such, construction and operation would not likely

**Table 3.7-3. Potential Effects to Special Status Species**

Species	Status	Potential Impact Rating	Potential Impact Summary
			reduce the overall amount of available suitable habitat.
American peregrine falcon ( <i>Falco peregrinus anatum</i> )	Arizona species of greatest conservation need	Negligible	The Proposed Action is unlikely to adversely affect this species. While the ROI exists within this species' range, proposed construction activities would not reduce the overall amount of available nesting habitat or substantially reduce available foraging habitat. No direct impacts are anticipated. Negligible indirect impacts expected from noise, disturbance of existing vegetation, or displacement of prey species during construction.
Northern Aplomado falcon ( <i>Falco femoralis septentrionalis</i> )	Arizona species of greatest conservation need	Negligible to minor	The Proposed Action may affect, but is unlikely to adversely affect this species. Suitable habitat exists within ROI. Species may experience indirect effects from increased human activity, noise, disturbance of vegetation, or displacement of prey species, especially in the expansion area or the proposed Commercial LPOE site. However, impacts would not substantially reduce overall available habitat or cause population-level effects.
Sprague's pipit ( <i>Anthus spragueii</i> )	Arizona species of greatest conservation need	Negligible to minor	The Proposed Action may affect, but is unlikely to adversely affect this species. Potentially suitable grassland habitat may exist within the ROI. Species may experience indirect effects from increased human activity, noise, disturbance of vegetation, or displacement of prey species, especially in the expansion area or the proposed Commercial LPOE site. However, impacts would not substantially reduce overall available habitat or cause population-level effects.
Gila monster ( <i>Heloderma suspectum</i> )	Arizona species of greatest conservation need	Negligible to minor	The Proposed Action may affect, but is unlikely to adversely affect this species. Suitable habitat exists within ROI. Species mostly lives underground and if present may experience direct effects from introduction of heavy machinery and commercial traffic in previously undisturbed areas resulting in soil compaction and disturbance of burrows and potential mortality. However, impacts would not substantially reduce overall habitat regionally available or cause population-level effects.
Massasauga ( <i>Sistrurus catenatus tergeminus</i> )	Arizona species of greatest conservation need	Negligible to minor	The Proposed Action may affect, but is unlikely to adversely affect this species. Potentially suitable grassland habitat may exist within the ROI. This less-mobile species, if present, may experience accidental mortality from introduction of

**Table 3.7-3. Potential Effects to Special Status Species**

Species	Status	Potential Impact Rating	Potential Impact Summary
			heavy machinery and commercial traffic in previously undisturbed areas. Species may experience indirect effects from increased human activity, noise, disturbance of vegetation, or displacement of prey species, especially in the expansion area or the proposed Commercial LPOE site. However, impacts would not substantially reduce overall habitat regionally available or cause population-level effects.
Milksnake ( <i>Lampropeltis triangulum gentilis</i> )	Arizona species of greatest conservation need	Negligible to minor	The Proposed Action may affect, but is unlikely to adversely affect this species. Potentially suitable grassland habitat may exist within the ROI. This less-mobile species, if present, may experience accidental mortality from introduction of heavy machinery and commercial traffic in previously undisturbed areas. Species may experience indirect effects from increased human activity, noise, disturbance of vegetation, or displacement of prey species, especially in the expansion area or the proposed Commercial LPOE site. However, impacts would not substantially reduce overall habitat regionally available or cause population-level effects.
Rock rattlesnake ( <i>Crotalus lepidus</i> )	Arizona species of greatest conservation need	Negligible to minor	The Proposed Action may affect, but is unlikely to adversely affect this species. Potentially suitable grassland habitat may exist within the ROI. This less-mobile species, if present, may experience accidental mortality from introduction of heavy machinery and commercial traffic in previously undisturbed areas. Species may experience indirect effects from increased human activity, noise, disturbance of vegetation, or displacement of prey species, especially in the expansion area or the proposed Commercial LPOE site. However, impacts would not substantially reduce overall habitat regionally available or cause population-level effects.
Twin-spotted rattlesnake ( <i>Crotalus pricei</i> )	Arizona species of greatest conservation need	Negligible to minor	The Proposed Action may affect, but is unlikely to adversely affect this species. Potentially suitable grassland habitat may exist within the ROI. This less-mobile species, if present, may experience accidental mortality from introduction of heavy machinery and commercial traffic in previously undisturbed areas. Species may experience indirect effects from increased human activity, noise, disturbance of vegetation, or displacement of prey species, especially in the expansion area or the proposed Commercial LPOE site. However,

**Table 3.7-3. Potential Effects to Special Status Species**

Species	Status	Potential Impact Rating	Potential Impact Summary
			impacts would not substantially reduce overall habitat regionally available or cause population-level effects.

Source: Arizona Game and Fish Department 2012; Arizona Game and Fish Department 2022; NatureServe 2022; USFWS 2022a  
LPOE = Land Point of Entry; ROI = Region of Influence

### **3.7.2.4 Alternative 1 – Sequential Construction**

Alternative 1 would have permanent, moderate, adverse, and direct impacts; as well as short-term, moderate, adverse, and indirect impacts on biological resources during construction at the proposed Commercial LPOE. There would be short-term, minor, adverse, and indirect impacts at the RHC LPOE during construction.

Operations of Alternative 1 would result in long-term, moderate, adverse, and indirect impacts to biological resources at the proposed Commercial LPOE; and long-term, negligible, beneficial, and indirect impacts to biological resources at the RHC LPOE.

#### **Construction**

##### ***Commercial LPOE***

Construction activities at the proposed Commercial LPOE could result in permanent, moderate, adverse, and direct impacts on biological resources. Construction activities would require ground disturbance and potential grading and clearing activities across the entire 80.5-acre site. Such activities would remove existing vegetation and therefore result in the alteration of the existing ecological community. This includes disturbing approximately 12.6 acres of the Apacherian-Chichuahuan Mesquite Upland Scrub community and approximately 67.9 acres of Chihuahuan Creosotebrush, Mixed Desert and Thorn Scrub community. Development of the site would further contribute to habitat fragmentation as the location near the U.S. border wall and the presence of existing roads and security infrastructure has already fragmented wildlife habitat and disturbed native vegetation communities. While the existing tract proposed for the development of the new Commercial LPOE is currently undeveloped, it does not represent high-quality native habitat for local species. Therefore, the potential impacts resulting from construction of Alternative 1 would be expected to be moderate but would not cause any direct species-level effects.

Construction of roads and buildings would introduce new levels of human activity. The resulting noise and human presence during construction activities could cause displacement of local wildlife, including migratory birds, from the surrounding area, and the introduction of cars, trucks, and heavy machinery could result in the mortality of a limited number of less-mobile animals. Section 3.9.2 discusses the temporary increase in noise generated during construction; this includes increased noise levels of 54 to 59 A-weighted sound level in decibels (dBA) 1,000 feet away from the construction site. Therefore, short-term, moderate, adverse, indirect impacts at the Commercial LPOE from noise during construction could occur to wildlife at distances of up to 1,000 feet away from the construction equipment.

##### ***RHC LPOE***

Due to the disturbed nature of the existing RHC LPOE property and the Alternative 1 Expansion Area, construction for Alternative 1 is not expected to introduce additional direct impacts to biological resources within the project area.

Indirect effects to biological resources arising from construction of Alternative 1 would be short-term, minor, and adverse. There would be temporary increases in traffic, general human activity, noise, and fugitive dust in the area, which could deter wildlife that commonly utilize the surrounding area, particularly the area immediately west of the RHC LPOE. Construction would occur in previously disturbed or currently

developed areas which frequent human activity; therefore, impacts to wildlife including migratory birds, would be minor, as most species that inhabit areas near the existing RHC LPOE either are tolerant of humans and vehicle traffic or are able to relocate to nearby areas of suitable habitat.

## **Operations**

### ***Commercial LPOE***

Operation of the proposed Commercial LPOE would introduce commercial vehicular traffic with the potential for long-term, moderate, adverse, and indirect effects to species in the surrounding undeveloped areas through noise disturbance, lighting, human presence, accidental mortality from vehicle strikes, or the introduction or spread of non-native, invasive species by vehicle traffic. Such impacts would be similar to those discussed under construction and are unlikely to result in permanent displacement of large numbers of wildlife or substantial reduction of available, high-quality habitat for native plant species.

### ***RHC LPOE***

Operations at the existing RHC LPOE would result in long-term, negligible, beneficial, and indirect impacts to biological resources. Pedestrians and POVs would continue to utilize the existing facility in the manner currently conducted, but COVs would be directed toward the new Commercial LPOE, thereby reducing overall traffic and avoiding most of the heavy vehicle traffic in the area. This would result in a slight reduction in noise and an associated beneficial impact to wildlife, including migratory birds.

### **Alternatives 1a – 1d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 1a through 1d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.1.2.1. As these sub-alternatives would take place within the footprint of the RHC LPOE, the potential impacts to biological resources as already identified under Alternative 1 would not change.

#### **3.7.2.5 *Alternative 2 – Concurrent Construction (Westward Expansion)***

Alternative 2 would have permanent, moderate, adverse, and direct impacts; as well as short-term, moderate, adverse, and indirect impacts on biological resources during construction at the proposed Commercial LPOE. At the RHC LPOE, there would be permanent, moderate, adverse, and direct impacts; as well as short-term, moderate, adverse, and indirect impacts on biological resources during construction.

Operations of Alternative 2 would result in long-term, moderate, adverse, and indirect impacts to biological resources at the proposed Commercial LPOE; and long-term, minor, adverse, and indirect impacts to biological resources at the RHC LPOE.

## **Construction**

Under Alternative 2, concurrent construction at the RHC LPOE, including the Alternative 1 Expansion Area, and the proposed new Commercial LPOE site would result in permanent, moderate, direct adverse impacts to biological resources near the proposed Commercial LPOE, similar to those described under Alternative 1. At the RHC LPOE, Alternative 2 includes the Alternative 2 Expansion Area (up to 13.9 additional acres), which primarily consists of undeveloped, open land area. Therefore, the extent of impacts to biological resources would be greater under Alternative 2 at the RHC LPOE due to the greater area of disturbance. Direct impacts to biological resources at the RHC LPOE would be permanent, moderate, and adverse. The intensity of indirect impacts from construction noise and human activity during construction would also be greater regionally under this alternative as construction would occur simultaneously at two sites within a compressed timeframe (i.e., approximately 36 to 42 months at the RHC LPOE and 48 to 54 months at the Commercial LPOE). These effects are expected to be temporary, moderate, and adverse during construction.



GSA may, instead, acquire temporary easements from the city for construction laydown areas for staging of heavy construction equipment. The use of temporary easements could result in fewer impacts to existing biological resources within the Alternative 2 Expansion Area if the temporary easements are within existing disturbed locations (e.g., the site of the former MGP). Any newly disturbed areas used for construction laydown would be returned to existing conditions post construction activities. Final plans for land acquisition and any use of temporary easements would be determined during the design process for the RHC LPOE.

### **Operations**

Under Alternative 2, impacts to biological resources during operations would be similar to those described under Alternative 1 for the proposed Commercial LPOE. Development of the expanded RHC LPOE under Alternative 2 would represent development of up to 13.9 additional acres of mostly undeveloped (although previously disturbed) land. Long-term, minor, adverse, and indirect impacts to biological resources could occur during operations of Alternative 2, from noise disturbance or general human presence; however, the undeveloped areas directly west of the Alternative 2 Expansion Area are mostly disturbed and do not represent high-quality native habitat for local species.

### **Alternatives 2a – 2d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 2a through 2d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.2.1. As these sub-alternatives would take place within the footprint of the RHC LPOE, the potential impacts to biological resources as already identified under Alternative 2 would not change.

#### **3.7.2.6 Alternative 3 – Concurrent Construction (Eastward Expansion)**

Alternative 3 would have permanent, moderate, adverse, and direct impacts; as well as short-term, moderate, adverse, and indirect impacts on biological resources during construction at the proposed Commercial LPOE. At the RHC LPOE, there would be permanent, minor, adverse, and direct impacts; as well as short-term, minor, adverse, and indirect impacts on biological resources during construction.

Operations of Alternative 3 would result in long-term, moderate, adverse, and indirect impacts to biological resources at the proposed Commercial LPOE; and long-term, negligible, adverse, and indirect impacts to biological resources at the RHC LPOE.

### **Construction**

Under Alternative 3, concurrent construction at the RHC LPOE, including the Alternative 1 Expansion Area, and the proposed new Commercial LPOE site would result in permanent, moderate, direct adverse impacts to biological resources near the proposed Commercial LPOE, similar to those described under Alternative 1. At the RHC LPOE, Alternative 3 also includes the Alternative 3 Expansion Area (up to 4.4 additional acres). This is a smaller land area than the Alternative 2 Expansion Area and is largely developed with existing buildings, structures, paved surfaces, and compacted soils from prior uses such that remaining vacant lands (less than an acre) are mainly disturbed, support limited vegetation, and provide minimal habitat for wildlife. Similar to Alternative 1, construction would occur in previously disturbed or currently developed areas with frequent human activity; therefore, impacts to wildlife, including migratory birds, would be minor, as most species that inhabit areas near the existing RHC LPOE either are tolerant of humans and vehicle traffic or are able to relocate to nearby areas of suitable habitat. The intensity of indirect impacts from construction noise and human activity during construction would also be greater regionally under this alternative as construction would occur simultaneously at two sites within a compressed timeframe (i.e., approximately 36 to 42 months at the RHC LPOE and 48 to 54 months at the Commercial LPOE). These effects are expected to be temporary, moderate, and adverse during construction.

## **Operations**

Under Alternative 3, impacts to biological resources during operations would be similar to those described under Alternative 1 for the proposed Commercial LPOE. Development of the expanded RHC LPOE under Alternative 3 would affect previously developed and disturbed lands east of the existing RHC LPOE. Long-term, negligible, adverse, and indirect impacts to biological resources could occur during operations of Alternative 3 from noise disturbance or general human presence; however, the undeveloped areas directly east of the Alternative 3 Expansion Area are mostly disturbed and do not represent high-quality native habitat for local species.

### **Alternatives 3a – 3d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 3a through 3d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.2.1. As these sub-alternatives would take place within the footprint of the RHC LPOE, the potential impacts to biological resources as already identified under Alternative 3 would not change.

#### **3.7.2.7 *Impact Reduction Measures***

In order to avoid or minimize impacts to vegetation, only approved, native species would be used for revegetation. These plant species would not be invasive or noxious species, and disturbed areas would be restored or revegetated to the extent practicable following construction. Construction equipment would be washed before and after coming to the site to the extent practicable to limit the transport of invasive species.

## 3.8 TRANSPORTATION AND TRAFFIC

This section describes the baseline conditions for transportation resources in the project area and potential roadway and traffic impacts that could result from implementing the Proposed Action, including the alternatives as discussed in Chapter 2.

### 3.8.1 Affected Environment

#### 3.8.1.1 *Region of Influence*

The RHC LPOE is located in Douglas, Arizona. As illustrated in Figure 1-2, the RHC LPOE is directly served by Pan American Avenue, although several routes in the greater vicinity are used by passenger vehicles and trucks to reach Pan American Avenue and the RHC LPOE. If the proposed improvements to the existing port are fully constructed and a new Commercial LPOE on James Ranch Road is developed, a larger roadway network would serve the traffic related to both LPOEs, as shown in Figure 1-1. Thus, the following roadway segments are analyzed to assess the potential impacts of vehicle and truck traffic:

- Pan American Avenue
- State Route 80 (east) (SR-80 [east]; for the purposes of the traffic analysis, SR-80 (east) refers to the segment that is located between US-191 and Pan American Avenue)
- U.S. Highway 191 (US-191)
- State Route 80 (SR-80)
- James Ranch Road
- State Route 80 (west) (SR-80 [west]; for the purposes of the traffic analysis, SR-80 refers to SR-80 that is located west of James Ranch Road)

#### 3.8.1.2 *Regulatory Setting and Requirements*

The Proposed Action would take place within Cochise County, Arizona. The ADOT is responsible for planning, designing, constructing, operating, and maintaining all state-owned roadways which include interstate highways, U.S. highways, and state highways. State routes in the project vicinity would utilize ADOT guidelines. The City of Douglas standards would be referenced for all locally maintained roadways, such as Pan American Avenue.

#### 3.8.1.3 *Existing Conditions*

##### Roadway Network

The primary transportation corridors in Cochise County are I-10 and Highways 80, 82, 90, 92, 181, 186, and 191. These corridors are ADOT-maintained roadways that link communities, travelers, and freight to neighboring counties, New Mexico to the east, and the country of Mexico to the south (Jacobs 2015). I-10 is located approximately 63 miles from the RHC LPOE via US-191. The I-10 acts as a major gateway between the City of Douglas, Metropolitan Phoenix, Metropolitan Tucson, and California.

##### Transportation Network

**Pan American Avenue** is a major thoroughfare in the City of Douglas and has a major arterial classification by the *City of Douglas Small Area Transportation Study* (TransCore et al. 2007). The roadway provides two lanes in each direction separated by a center two-way left-turn lane and has a north-south orientation in the immediate project vicinity. Pan American Avenue also provides curb, gutter, sidewalk, and roadway lighting on both sides of the roadway. The posted speed limit on Pan American Avenue near the RHC LPOE is 35 mph. In addition to providing direct access to the RHC LPOE to the south, the roadway connects to US-191 and SR-80 further north.

**U.S. Highway 191 (US-191)** is a north-south-aligned roadway with a minor arterial classification by the *ADOT Federal Functional Classification Map* (ADOT 2022b). The highway spans across several states before terminating at its intersection with SR-80. Although various lane configurations are present throughout its span, US-191 typically offers a two-lane undivided cross-section (one lane in each direction separated by dashed yellow pavement markings) with paved shoulders. The posted speed limit on US-191 in the project vicinity is 45 mph.

**State Route 80 (SR-80)** is a major thoroughfare in southern Arizona that spans between Bisbee, Arizona and the New Mexico border. The roadway has a principal arterial classification by the *ADOT Federal Functional Classification Map* (ADOT 2022b) and a posted speed limit of 55 mph. SR-80 typically provides a four-lane divided cross section (two through lanes in each direction separated by a recessed median) and paved shoulders.

**James Ranch Road** is an unpaved dirt road approximately 5.5 miles west of Pan American Avenue. The roadway is unclassified by the *City of Douglas Small Area Transportation Study* (TransCore et al. 2007) and is assumed to have a local road designation. Sufficient width is offered for bidirectional travel, and the assumed speed limit is 25 mph. In support for the proposed Commercial LPOE and future regional planning efforts, ADOT would be extending and improving this road under a separate project. Further details are provided in Chapter 4, Cumulative Impacts.

**International Avenue** (alternately named Border Road) is an unpaved dirt road that parallels the U.S.-Mexico border. International Avenue is currently unrestricted and open to all users, although it is primarily used as an access road for maintenance and operations with low, intermittent volumes. The roadway is not expected to facilitate ingress or egress for the Commercial LPOE and is not considered further in the traffic analysis.

**Customs Avenue** is a north-south aligned roadway approximately 900 feet in length that connects International Avenue with Pan American Avenue. The roadway is unclassified by the *City of Douglas Small Area Transportation Study* (TransCore et al. 2007) and is assumed to have a local road designation. South of 1<sup>st</sup> Avenue the roadway is unstriped with sufficient width for one lane in each direction. North of 1<sup>st</sup> Avenue, the roadway is striped to provide a designated lane in each direction. The assumed speed limit on this roadway is 25 miles per hour. A bus stop is located on the east side of Customs Avenue north of 1<sup>st</sup> Avenue.

### **Traffic Volumes**

Historical traffic counts referenced from the ADOT Traffic Data Management System database were used to establish baseline traffic volumes for analysis (ADOT 2022c). ADOT Traffic Data Management System historical counts provided volumes from 2021; as the majority of Arizona traffic volumes had returned to COVID-19 pre-pandemic levels by the end of 2020, the volumes from 2021 are considered to be a reliable resource. A background growth rate was used to adjust historic volumes to existing (2022) conditions.

Furthermore, throughput volumes at the LPOE were not collected as part of this study and were instead referenced from a traffic study (GSA 2018) conducted for this project. Throughput volumes were collected in 2017, prior to any pandemic effects, and were provided by the CBP. To be consistent with the traffic volumes, a background growth rate was applied to the 2017 throughput volumes for POVs and COVs to adjust these volumes to 2022 existing conditions.

It should be noted that traffic volumes were not provided on James Ranch Road. As the roadway only serves a few properties, volumes are assumed to be low.

Figure 3.8-1 provides a diagram of the project study segments and the 2022 existing volumes.

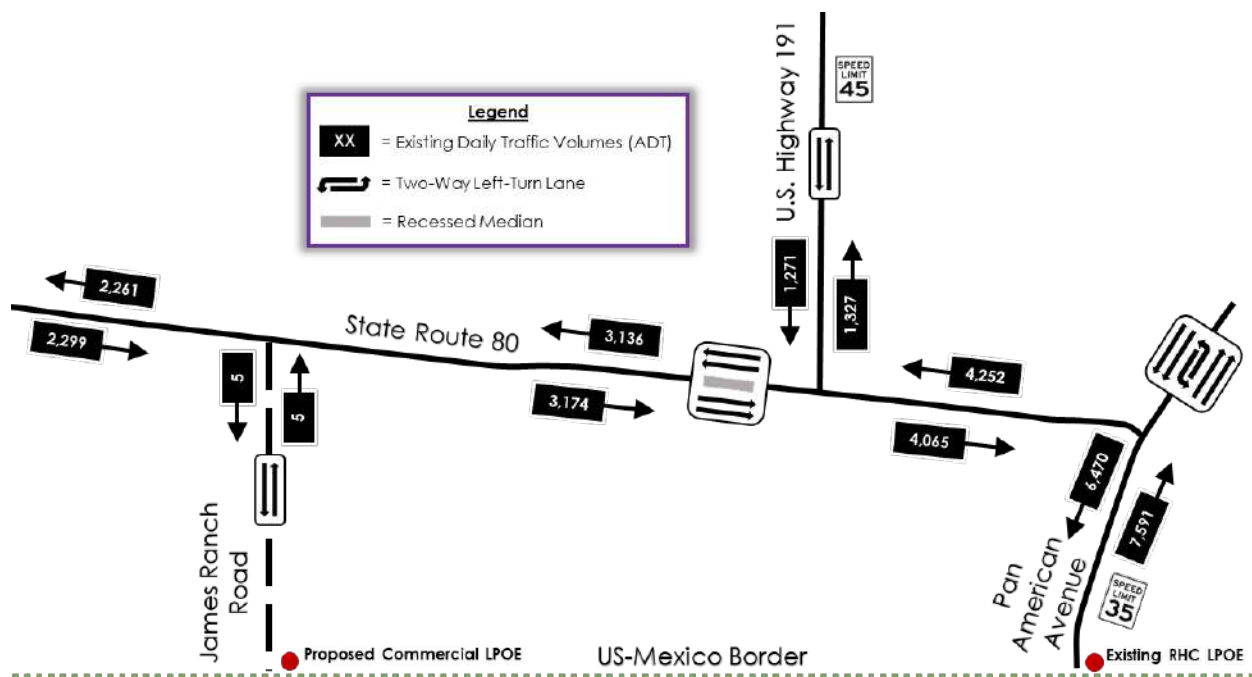


Figure 3.8-1. 2022 Existing Traffic Volumes

### Growth Rates

Several resources were referenced to determine an appropriate growth rate for potential future traffic conditions. Historical ADOT Traffic Data Management System volumes showed fluctuating traffic volumes in the area over the past 20 years. The *City of Douglas Small Area Transportation Study* (TransCore et al. 2007) noted the population growth from 1990 to 2005 yielded a compounded annual growth rate of approximately 1.02%. The traffic study conducted for this project calculated a 1.1% growth rate from historical throughput data at the RHC LPOE (GSA 2018). As the vehicular traffic must traverse through the Douglas area before reaching an intended destination (such as California, Phoenix, or New Mexico), the growth from the throughput is assumed to have a direct correlation to the volumes in the Douglas area. Based on the available growth indices, a 1.1% compounded annual growth rate was selected to grow historical counts to 2022 existing conditions.

To analyze the future 2028 and 2033 study years, two different growth scenarios were evaluated. The first evaluation maintains an anticipated 1.1% growth, including both the background population/POV growth and COV growth. This is assumed to reflect realistic growth over the next 10 years. A second, more conservative growth estimate was evaluated to assess a worst-case scenario of increased traffic as a direct result of increasing efficiency at the LPOE. This conservative growth estimate assumed the Douglas population and POV growth would increase at 2% per year (this is a typical growth rate used by ADOT for other projects in the state of Arizona) and the COV growth would increase approximately 8.6% per year (which is consistent with COV growth levels experienced since 2021) (PHE 2022).

In addition to documenting the volume of POVs and COVs at the RHC LPOE, the City of Douglas traffic study (TransCore et al. 2007) also documented the volume of pedestrians crossing the border. The majority of pedestrians were noted to be students attending local schools and colleges, and would regularly cross the border each day. Once in the Douglas area, pedestrians would potentially continue to walk to their destination or take a vehicle (such as a single-passenger vehicle or a ride-share/van) to arrive at their destination. While it is challenging to document exactly how an increase in pedestrian activity at the RHC

LPOE with the proposed enhancements would affect the roadway volumes and congestion within the ROI, the assumed background population growth in the Douglas area would be expected to account for this.

### **Traffic Distribution**

As the Proposed Action would relocate COV processing to the proposed Commercial LPOE location 5.5 miles west of the RHC LPOE, the general commercial traffic is assumed to shift as well. As such, commercial traffic volumes were subtracted from Pan American Avenue and added to James Ranch Road for purposes of analysis. The traffic volumes generated by the COV traffic were then added to segments based on the following distribution (and based on the assumed growth rate of either 1.1% or 8.6%, depending on the growth scenario analyzed).

- Because SR-80 restricts most large vehicles and trailers near Bisbee, Arizona (due to tight turns and large grades), it is assumed that all COVs leaving the Commercial LPOE would head east on SR-80, with the majority heading north on US-191 to access Davis Road and I-10 before heading west (towards California) or north (towards Tucson or Phoenix). For the purposes of the traffic analysis, 95% of COVs are assumed to use SR-80 (between James Ranch Road and US-191) and US-191. The distribution of this traffic is assumed to be as follows:
  - 45% of truck traffic would head west towards California
  - 50% of truck traffic would head north to Metropolitan Tucson or Phoenix
- The remaining approximately 5% of truck traffic is assumed to continue east and remain on SR-80 towards New Mexico.

### **Evaluation Scenarios**

The Proposed Action is anticipated to be constructed in multiple phases. In order to estimate the impact to traffic volumes and assess any adverse effects to roadway segments for the project alternatives, traffic analyses were conducted for the year 2028 (expected substantial completion of construction for the proposed Commercial LPOE under Alternative 1 and for both LPOE sites under Alternatives 2 and 3) and for the year 2033 (to provide a 5-year projection from the year 2028). Although GSA anticipates that substantial construction completion for the RHC LPOE would occur in Fall of 2031 under Alternative 1, the traffic analysis extends the analysis to the year 2033 in order to capture a 5-year growth horizon, which would also ensure operation conditions are fully captured for both LPOEs. The 2022 existing conditions and projected baseline conditions (for the years 2028 and 2033) were also evaluated to establish a baseline for comparison (i.e., traffic conditions under the No Action Alternative).

As the conservative analysis of 2% growth for population and POVs and 8.6% growth for COVs is largely dependent on increasing efficiency at the port and connectivity to the City of Agua Prieta in Mexico, along with the assumption that COV growth currently experienced since 2021 would remain consistent for the next 10 years with the help of the proposed Commercial LPOE, the conservative worst-case scenario was analyzed in the Proposed Action conditions.

### **Thresholds**

The roadway segments were evaluated for operational deficiencies without and with the proposed LPOE enhancements. First, growth calculations were conducted to determine the average daily traffic anticipated on each roadway segment (volume, V) and the roadway segments were categorized by their professional classification and number of through lanes to determine the maximum capacity (capacity, C). Using this volume-to-capacity (V/C) ratio, the segments were then classified by their level of service (LOS) as a measurement of congestion and operation. LOS for a roadway segment is graded from A to F, with LOS A through D representing adequate operating conditions and LOS E or F representing unacceptable operating conditions.

Several agencies were referenced to find a suitable measurement of capacity on the roadways (and, therefore, to determine the LOS). Neither the City of Douglas, Cochise County or ADOT provide guidelines for the maximum capacity for a roadway by classification type, or a metric to calculate LOS for a roadway segment. Only the City of Yuma and Maricopa County Department of Transportation (MCDOT) provide relevant information. The City of Yuma’s 2010 – 2033 Regional Transportation Plan (Ayres et al. 2010) provides guidelines on the maximum capacity of a roadway by the number of through lanes and classification type, and a conversion factor to LOS. The MCDOT Roadway Design Manual (MCDOT 2021) provides similar guidelines, although with lower thresholds and more conservative capacities. Because the MCDOT data was more conservative overall and provided thresholds for both urban and rural settings (the rural data is most applicable for this analysis, and it provides an even more conservative evaluation than urban), MCDOT guidelines were selected for this analysis. However, MCDOT does not provide a conversion between the V/C ratio and LOS; due to this, nationally published LOS thresholds were referenced (Arfin and Yado 2020). National data specifies the following LOS tolerances shown in Table 3.8-1.

**Table 3.8-1. Operating Conditions for Levels of Service (LOS) and Volume-to-Capacity (V/C) Ratios**

LOS	Traffic Condition	V/C Ratio
A	Free Flow	<0.60
B	Light congestion	0.61-0.70
C	Stable flow with lower speeds	0.71-0.80
D	High density with stable flow	0.81-0.90
E	Severe congestion	0.91-1.00
F	Total breakdown	>1.00

The existing (2022) average daily traffic volumes on the roadways were assessed using the methodology discussed above. All historical data was grown using a 1.1% growth rate. The results are summarized in Table 3.8-2 below.

As shown in Table 3.8-2, all roadway segments currently operate at LOS B or better.

**Table 3.8-2. 2022 Existing LOS Results**

Roadway	# Thru Lanes	Classification	Max Capacity	ADT	V/C Ratio	LOS
Pan American Avenue	4	Major Arterial	22,900	14,216	0.62	B
SR-80 E (east of US-191)	4	Principle Arterial	22,900	8,409	0.37	A
US-191	2	Minor Arterial	20,700	2,627	0.13	A
SR-80 (between James Ranch Road and US-191)	4	Principle Arterial	22,900	6,379	0.28	A
James Ranch Road	2	Local	700	10	0.01	A
SR-80 W (west of James Ranch Road)	4	Principle Arterial	22,900	4,610	0.20	A

ADT = average daily traffic, LOS = level of service, V/C = volume-to-capacity  
Source: ADOT 2022c

### 3.8.2 Environmental Consequences

#### 3.8.2.1 Methodology

To evaluate the impacts on transportation resources, GSA reviewed the project alternatives to determine whether any activities have the potential to cause the following within the ROI:

- Change in vehicular traffic congestion, delays, or safety risks on roadways;
- Change in the LOS on roadways;
- Change in the operating capacity of the RHC LPOE; and
- Change in pedestrian and bicycle activity.

A significant adverse impact to transportation facilities would occur if the Proposed Action would result in:

- Increase in traffic volumes that would exceed the capacity of local roadways and intersections within the study area (i.e., significant degradation of LOS);
- Increase in traffic volumes resulting in deficient operations at the RHC LPOE;
- Increase in traffic resulting in traffic hazards to workers and users at the RHC LPOE; and
- Disruption or interference with existing pedestrian and bicycle facilities.

#### 3.8.2.2 No Action Alternative

Under the No Action Alternative, GSA would not construct a new Commercial LPOE or expand and modernize the RHC LPOE. Therefore, vehicular trip generation and distribution of traffic on the local and regional roadways would remain unchanged from baseline conditions. In addition, there would be no construction activity on site and, as such, there would be no construction-related impacts.

Future traffic conditions under projected baseline conditions (i.e., the No Action Alternative) were calculated to provide a baseline comparison of the impacts for the Alternative 1 and Alternative 2 scenarios. The 1.1% compounded annual growth rate (reflecting anticipated growth conditions) was applied to the 2022 existing traffic volumes to estimate the future 2028 and 2033 traffic volumes under the projected baseline conditions. The average daily traffic summaries for the 2028 and 2033 projected baseline conditions are provided in Table 3.8-3 and Table 3.8-4, respectively.

**Table 3.8-3. 2028 Projected Baseline Conditions LOS Results**

Roadway	# Thru Lanes	Classification	Max Capacity	ADT	V/C Ratio	LOS
Pan American Avenue	4	Major Arterial	22,900	15,180	0.66	B
SR-80 (east)	4	Principle Arterial	22,900	8,979	0.39	A
US-191	2	Minor Arterial	20,700	2,805	0.14	A
SR-80 (between James Ranch Road and US-191)	4	Principle Arterial	22,900	6,813	0.30	A
James Ranch Road	2	Local	700	10	0.01	A
SR-80 (west)	4	Principle Arterial	22,900	4,923	0.21	A

ADT = average daily traffic, LOS = level of service, V/C = volume-to-capacity



**Table 3.8-4. 2033 Projected Baseline Conditions LOS Results**

Roadway	# Thru Lanes	Classification	Max Capacity	ADT	V/C Ratio	LOS
Pan American Avenue	4	Major Arterial	22,900	16,034	0.70	B
SR-80 (east)	4	Principle Arterial	22,900	9,483	0.41	A
US-191	2	Minor Arterial	20,700	2,962	0.14	A
SR-80 (between James Ranch Road and US-191)	4	Principle Arterial	22,900	7,195	0.31	A
James Ranch Road	2	Local	700	12	0.02	A
SR-80 (west)	4	Principle Arterial	22,900	5,200	0.23	A

ADT = average daily traffic, LOS = level of service, V/C = volume-to-capacity

Under the No Action Alternative, roadway segments within the ROI are anticipated to continue operating at acceptable LOS levels in 2028 and 2033, as summarized in Tables 3.8-3 and 3.8-4. Although LOS of the roadways would not substantially degrade during the years analyzed, the average daily traffic volumes are projected to increase and the LOS levels would be expected to decline in the future as surrounding population growth and travel at the border increases. Since COV processing would remain onsite, trucks and associated congestion and safety issues would remain in the City of Douglas and would hinder the city’s revitalization plans for the downtown district. Furthermore, the capacity and efficiency of operations at the RHC LPOE would degrade over time, leading to longer delays and congestion. Overall, long-term, minor to moderate adverse impacts to transportation and traffic would be expected under the No Action Alternative.

**3.8.2.3 Alternative 1 – Sequential Construction**

Under Alternative 1, construction of the proposed Commercial LPOE and RHC LPOE would result in short-term, minor, adverse impacts to transportation resources and traffic levels, and temporary minor adverse impacts to pedestrian facilities. Operations would result in overall long-term, minor adverse impacts to transportation resources and traffic levels. In the City of Douglas, there would be long-term, beneficial direct impacts from relocation of COVs, but there could also be long-term, minor to moderate, adverse, and indirect impacts from population growth and increased efficiency of the RHC LPOE.

**Construction (Commercial and RHC LPOEs)**

Due to the interconnected nature of traffic impacts from construction and operations of the proposed Commercial LPOE and the expanded and modernized RHC LPOE, the traffic analysis for impacts at both the Commercial LPOE and RHC LPOE are combined.

Under Alternative 1, construction traffic is anticipated to result in short-term, intermittent and minor adverse impacts to roadways within the ROI at the proposed Commercial LPOE and RHC LPOE. Alternative 1 proposes to construct the project sequentially: the proposed Commercial LPOE would initially be constructed and substantially completed by 2028; and construction of the RHC LPOE would begin after COV processing moves to the new Commercial LPOE, and then be substantially completed by 2031. Due to the COVs being removed from the existing RHC LPOE location around 2028, the COV traffic is expected to decrease on Pan American Avenue and is expected to increase on James Ranch Road and SR-80 (between James Ranch Road and Pan American Avenue). The RHC LPOE is still expected to be open and operational during construction, though is not expected to have a significant impact on the overall daily throughput at the border due to careful phasing of the construction.

Construction traffic under Alternative 1 is expected to cause increases in daily volumes on the roadways in the ROI, first at the proposed Commercial LPOE and then at the RHC LPOE. During peak construction conditions (up to 2 years), approximately 100 construction workers and 150 construction-related trucks are

anticipated, effectively creating 500 new daily vehicle trips on the major surrounding roadways (i.e., 250 entering and exiting the area).

The major roadways in the area, such as Pan American Avenue, US-191, SR-80, and eventually James Ranch Road, have a relatively high maximum capacity (as shown in Table 3.8-2). An increase of 500 vehicles per day on these roadways is expected to have a temporary minor impact to the V/C ratios and the LOS. Furthermore, commuter traffic would be limited to the peak a.m. and p.m. commuting hours, near the start and end of the workday, respectively.

James Ranch Road is anticipated to have a maximum capacity of 5,000 vehicles per day once improved to a minor collector classification. The addition of 500 construction-related vehicle trips per day would have the largest impact to its V/C ratio. However, the LOS would still remain at an LOS A even with construction traffic added.

The conceptual layout for the expanded RHC LPOE (see Figure 2-4) incorporates Customs Avenue between Pan American Avenue and 1<sup>st</sup> Street into the footprint of the expanded port. Permanent closure of this segment of Customs Avenue would occur early during construction and would require rerouting of vehicular access to the businesses on 1<sup>st</sup> Street via G and H Avenues. Existing traffic volumes on G and H Avenues between 1<sup>st</sup> and 3<sup>rd</sup> Streets are relatively low (ADOT 2022 daily traffic volumes on G Avenue are approximately 1,100 vehicle per day), and the numbers of COVs accessing the businesses daily are expected to be low. As a result, this closure is expected to have a long-term, negligible to minor, adverse impact on LOS for the local roadways. The relocation of COV traffic to the Commercial LPOE would also remove COVs from G and H Avenues that currently access the RHC LPOE via International Avenue. This would compensate for additional COVs that would use G and H Avenues after closure of the segment of Customs Avenue.

Construction would involve temporary pedestrian sidewalk closures, as some pedestrian sidewalks in the vicinity of the RHC LPOE would be closed during the construction period. Pedestrians would still be permitted at the RHC LPOE; however, they may be re-directed to use alternate sides of the roadway or alternate areas of the LPOE permitted to maintain connectivity per the Americans with Disabilities Act. Thus, temporary, minor adverse impacts would occur on pedestrian facilities along the project frontage during construction.

### **Operations (Commercial and RHC LPOEs)**

The 2028 and 2033 operational evaluation combines the growth of the existing traffic volumes and the anticipated changes to COV traffic on the surrounding roadway network. As discussed under “Evaluation Scenarios” in Section 3.8.1.3, two scenarios are considered for the impacts analysis, an “anticipated growth” scenario where a 1.1% growth rate would occur for population/POV and COV growth, and “worst-case” scenario where a 2% population/POVs growth and an 8.6% COV growth would occur. The results of the 2028 and 2033 operational evaluation are summarized in

Table 3.8-5 and Table 3.8-, respectively.

Under Alternative 1, adverse impacts to traffic and transportation resources would be long-term and minor overall; the City of Douglas would experience a long-term, beneficial impact from the relocation of COV traffic from the city to the new Commercial LPOE. In 2028 and 2033 with implementation of Alternative 1, all roadway segments are anticipated to be operating at acceptable LOS C or better.

**Table 3.8-5. 2028 Proposed Action LOS Results**

Roadway	# Thru Lanes	Classification	Max Capacity	Anticipated Growth			Worst-Case Scenario		
				ADT	V/C Ratio	LOS	ADT	V/C Ratio	LOS
Pan American Avenue	4	Major Arterial	22,900	14,890	0.64	B	15,692	0.67	B
SR-80 (east)	4	Principle Arterial	22,900	8,703	0.38	A	9,335	0.40	A
US-191	2	Minor Arterial	20,700	2,791	0.13	A	2,960	0.14	A
SR-80 (between James Ranch Road and US-191)	4	Principle Arterial	22,900	7,103	0.31	A	7,708	0.33	A
James Ranch Road	2	Minor Collector	5,000	300	0.01	A	472	0.01	A
SR-80 (west)	4	Principle Arterial	22,900	4,923	0.21	A	5,238	0.22	A

ADT = average daily traffic, LOS = level of service, V/C = volume-to-capacity

**Table 3.8-6. 2033 Proposed Action LOS Results**

Roadway	# Thru Lanes	Classification	Max Capacity	Anticipated Growth			Worst-Case Scenario		
				ADT	V/C Ratio	LOS	ADT	V/C Ratio	LOS
Pan American Avenue	4	Major Arterial	22,900	15,726	0.69	B	17,139	0.75	C
SR-80 (east)	4	Principle Arterial	22,900	9,191	0.40	A	9,888	0.43	A
US-191	2	Minor Arterial	20,700	2,946	0.14	A	3,261	0.16	A
SR-80 (between James Ranch Road and US-191)	4	Principle Arterial	22,900	7,503	0.33	A	8,696	0.38	A
James Ranch Road	2	Minor Collector	5,000	320	0.06	A	706	0.14	A
SR-80 (west)	4	Principle Arterial	22,900	5,200	0.23	A	5,783	0.25	A

ADT = average daily traffic, LOS = level of service, V/C = volume-to-capacity

James Ranch Road is anticipated to have a maximum capacity of 5,000 vehicles per day once improved to a minor collector classification. As shown in Table 3.8-6, even under the worst-case scenario, the projected traffic volume on this road would still be well under its maximum capacity and its LOS level would still remain at an LOS A, even with COV and commuting worker traffic added.

Removing commercial traffic away from the existing RHC LPOE to a new location on James Ranch Road is anticipated to have a long-term, beneficial impact to traffic and transportation resources in the City of Douglas. Local roadways (which are not designed to experience daily loads of heavy-duty trucks) are expected to experience less wear on the asphalt from fewer trucks with multiple axles, and the noise, air emissions, and congestion associated with large and slow COVs would also be substantially reduced.

Based on the traffic analysis summarized in Table 3.8-2, the major roadways affected by travel to and from the RHC LPOE currently operate with minimal traffic volumes and provide acceptable operational characteristics. Under Alternative 1, roadways within the ROI are anticipated to continue operating with sufficient capacities and acceptable LOS levels for the years analyzed, as summarized in Tables 3.8-5 and 3.8-6.

As described for construction above, permanent closure of Customs Avenue between Pan American Avenue and 1<sup>st</sup> Street is expected to cause a long-term, negligible to minor, adverse impact on LOS for the local roadways. The loss of access to the road segment would also require the relocation of an existing bus stop on Customs Avenue and would potentially affect bus routes in the vicinity.

Although vehicular traffic volumes in the city would initially experience a net decrease because of the removal of the COVs, it is uncertain how the increased efficiency of the modernized port would impact future traffic volumes. Because the RHC LPOE would be upgraded, there would be more POVs passing through per hour as processing times would decrease. Additionally, the traffic analysis assumed a conservative growth rate of 2% to estimate the increase in POV traffic volumes. As such, vehicular traffic volumes at the RHC LPOE could increase beyond the analysis year 2033, thus leading to more traffic volumes and long-term, minor to moderate indirect adverse impacts to transportation resources.

### **Alternatives 1a – 1d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 1a through 1d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.1.2.1. As these sub-alternatives would take place within the footprint of the RHC LPOE, the potential impacts to traffic and transportation resources as already identified under Alternative 1 would be similar. Additional temporary, minor adverse impacts to traffic would occur under Alternatives 1c and 1d from additional trucks transporting debris during construction.

### **3.8.2.4 *Alternative 2 – Concurrent Construction (Westward Expansion)***

Under Alternative 2, construction of the proposed Commercial LPOE and RHC LPOE would result in short-term, minor to moderate, adverse impacts to transportation resources and traffic levels, and temporary minor adverse impacts to pedestrian facilities. Operations would result in overall long-term, minor adverse impacts to transportation resources and traffic levels. In the City of Douglas, there would be long-term, beneficial direct impacts from relocation of COVs, but there could also be long-term, minor to moderate, adverse, and indirect impacts from population growth and increased efficiency of the RHC LPOE.

### **Construction (Commercial and RHC LPOEs)**

Under Alternative 2, construction traffic is anticipated to result in temporary, minor to moderate adverse impacts to roadways and traffic conditions within the ROI at the proposed Commercial LPOE and RHC LPOE. Alternative 2 proposes to construct the project concurrently, where the proposed Commercial LPOE and the enhancements to the RHC LPOE would both be substantially complete by 2028. The RHC LPOE is still expected to be open and operational during construction, though is not expected to have a significant impact on the overall daily throughput at the border due to careful phasing of the construction.

Similar to Alternative 1, construction traffic under Alternative 2 is expected to cause an increase in daily traffic volumes on the roadways within the ROI. During peak construction conditions (up to 2 years), approximately 100 construction workers and 150 construction-related trucks are anticipated, effectively creating 500 new daily vehicle trips on the major surrounding roadways (i.e., 250 entering and exiting the area). However, because construction of the proposed Commercial LPOE and at the RHC LPOE would occur simultaneously, some of the roadways would experience an overlap of construction traffic for both LPOE sites. Furthermore, COV processing would remain onsite at the existing port throughout the construction phase at the RHC LPOE. As such, Pan American Avenue, SR-80 (east), and US-191 would likely experience greater traffic volumes than those that would occur under Alternative 1.

For comparison, Pan American Avenue, SR-80 (east), and US-191 are expected to have a relatively high maximum capacity under baseline conditions in 2028, as shown in Table 3.8-3. An increase of 500 vehicles per day on these roadways is expected to have a temporary minor to moderate impact to the V/C ratios, even considering potential overlapping traffic volumes. Pan American Avenue could potentially degrade to an LOS of C, though the operating conditions at this level still represents acceptable traffic conditions. Furthermore, the majority of traffic volumes results from commuting traffic which would be limited to peak a.m. and p.m. commuting hours during the workday.

Similar to Alternative 1, construction would involve temporary pedestrian sidewalk closures, and pedestrians may be re-directed to use alternate sides of the roadway or alternate areas of the LPOE. Thus, temporary, minor adverse impacts would occur on pedestrian facilities along the project frontage during construction. The inclusion of construction in the Alternative 1 Expansion Area for Alternative 2 would also require permanent closure of Customs Avenue between Pan American Avenue and 1<sup>st</sup> Street, which would have comparable impacts as discussed for Alternative 1.

### **Operations (Commercial and RHC LPOEs)**

Potential impacts to transportation and traffic under Alternative 2 would be similar to those discussed under Alternative 1. Under Alternative 2, adverse impacts to transportation and traffic would be long-term and minor overall; the City of Douglas would experience a long-term, beneficial impact from the relocation of COV traffic from the city to the new Commercial LPOE.

Similar to Alternative 1, the COV traffic is expected to decrease on Pan American Avenue and SR-80 (east) and increase on James Ranch Road and SR-80 (between James Ranch Road and Pan American Avenue). However, because construction would be substantially completed for both LPOE sites by 2028, the traffic scenario presented in Table 3.8-5 (Proposed Action LOS in 2028) would likely be the traffic conditions on the roadways by the time both facilities are in operations. Under Alternative 2, roadways within the ROI are anticipated to continue operating with sufficient capacities and acceptable LOS levels, as summarized in Tables 3.8-5 and 3.8-6.

### **Alternatives 2a – 2d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 2a through 2d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.2.1. Under Alternatives 2a through 2d, transportation and traffic impacts during construction would be similar to those described under Alternatives 1a through 1d.

#### ***3.8.2.5 Alternative 3 – Concurrent Construction (Eastward Expansion)***

Under Alternative 3, construction of the proposed Commercial LPOE and RHC LPOE would result in short-term, minor to moderate, adverse impacts to transportation resources and traffic levels, and temporary minor adverse impacts to pedestrian facilities. Operations would result in overall long-term, minor adverse impacts to transportation resources and traffic levels. In the City of Douglas, there would be long-term, beneficial direct impacts from relocation of COVs, but there could also be long-term, minor to moderate, adverse, and indirect impacts from population growth and increased efficiency of the RHC LPOE.

### **Construction (Commercial and RHC LPOEs)**

Under Alternative 3, construction traffic is anticipated to result in temporary, minor to moderate adverse impacts to roadways and traffic conditions within the ROI at the proposed Commercial LPOE and RHC LPOE. Similar to Alternative 2, Alternative 3 would include concurrent construction, where the proposed Commercial LPOE and the enhancements to the RHC LPOE would both be substantially complete by 2028. The RHC LPOE is still expected to be open and operational during construction, though is not expected to have a significant impact on the overall daily throughput at the border due to careful phasing of the construction.

In general, the impacts of construction traffic for Alternative 3 would be comparable to those described for Alternative 2 above, including traffic volumes and LOS. The inclusion of construction in the Alternative 1 Expansion Area for Alternative 3 would also require permanent closure of Customs Avenue between Pan American Avenue and 1<sup>st</sup> Street, which would have comparable impacts as discussed for Alternative 1. However, demolition and construction at the Alternative 3 Expansion Area would also require permanent closure of Customs Avenue between East 1<sup>st</sup> Street and International Avenue. Closure of International Avenue between Customs Avenue and the eastern end of the expansion area, as well as a portion of East 1<sup>st</sup> Street would also occur when the COV entrance to the LPOE is closed. Intermittent closures may be necessary on East 1<sup>st</sup> Street between Customs Avenue and H Avenue during construction at the Alternative 3 Expansion Area. These closures would be communicated to the businesses on the north side of East 1<sup>st</sup> Street and coordinated as practicable to reduce impacts on access to those businesses.

Similar to Alternatives 1 and 2, construction would involve temporary pedestrian sidewalk closures, and pedestrians may be re-directed to use alternate sides of the roadway or alternate areas of the LPOE. Thus, temporary, minor adverse impacts would occur on pedestrian facilities along the project frontage during construction.

### **Operations (Commercial and RHC LPOEs)**

Potential impacts to transportation and traffic under Alternative 3 would be similar to those discussed under Alternative 2. The acquisition and incorporation of the Alternative 3 Expansion Area footprint into the expanded RHC LPOE would cause the permanent closure of Customs Avenue between East 1<sup>st</sup> Street and International Avenue, as well as International Avenue between Customs Avenue and the eastern end of the expansion area and a portion of East 1<sup>st</sup> Street. However, after the relocation of COV traffic to the new Commercial LPOE, the closure of these road segments would not be expected to affect LOS on adjacent roadways. Under Alternative 3, adverse impacts to transportation and traffic would be long-term and minor overall; the City of Douglas would experience a long-term, beneficial impact from the relocation of COV traffic from the city to the new Commercial LPOE.

Similar to Alternative 1, the COV traffic is expected to decrease on Pan American Avenue and SR-80 (east) and increase on James Ranch Road and SR-80 (between James Ranch Road and Pan American Avenue). However, because construction would be substantially completed for both LPOE sites by 2028, the traffic scenario presented in Table 3.8-5 (Proposed Action LOS in 2028) would likely be the traffic conditions on the roadways by the time both facilities are in operations. Under Alternative 3, roadways within the ROI are anticipated to continue operating with sufficient capacities and acceptable LOS levels, as summarized in Tables 3.8-5 and 3.8-6.

### **Alternatives 3a – 3d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 3a through 3d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.2.1. Under Alternatives 3a through 3d, transportation and traffic impacts during construction would be similar to those described under Alternatives 1a through 1d.

#### **3.8.2.6 Impact Reduction Measures**

Measures that would reduce impacts related to transportation during construction and operations are discussed below.

- Minimize construction vehicle movement during peak traffic hours;
- Place construction staging areas where they would least interfere with local traffic and parking;
- Minimize detours and impacts to pedestrians during construction activities, to include by providing appropriate information and signage to pedestrians and motorists who are traveling throughout the area;

- Develop a construction traffic and parking management plan in coordination with local officials and business directly affected by street closures that minimizes traffic interference and maintains traffic flow and safety.
- Develop and implement Transportation Demand Management strategies to reduce single occupancy vehicles and encourage carpooling and implementing a shuttle bus for commuting to/from construction sites;
- Implement traffic signal coordination on arterial streets where practical to maximize the efficiency of the intersections and roadway network;
- Coordinate with local, state, and federal transportation authorities when planning access to the RHC LPOE site; and
- Follow all local, state, and federal planning guidelines and regulations when maintaining or upgrading roadway infrastructure.



## 3.9 NOISE

This section describes the baseline conditions for noise levels in the project areas and potential noise impacts that could result from implementing the Proposed Action, including the alternatives as discussed in Chapter 2. Sensitive noise receptors identified include nearby residences, schools, libraries, hospitals, nursing home facilities, and recreational areas.

### 3.9.1 Affected Environment

#### 3.9.1.1 *Region of Influence*

The ROI for the noise analysis includes areas within 0.5 mile (2,640 feet) of the proposed Commercial LPOE, the existing RHC LPOE and expansion areas, and areas along either side of regional major roadways that would experience potential increases in project-related traffic (see Section 3.8, Transportation and Traffic), including: James Ranch Road, SR-80 (between James Ranch Road and US-191; and between US-191 and Pan American Avenue), US-191, and Pan American Avenue.

#### 3.9.1.2 *Regulatory Setting and Requirements*

**Noise Principles.** Noise is defined as any sound that is undesirable to a receptor because it interferes with communication, is intense enough to damage hearing, or is otherwise intrusive and degrades quality of life. Noise can also be detrimental if it disturbs an organism's normal behavior (USEPA 1981).

The human ear experiences sound because of pressure variations in the air. The physical intensity or loudness level of noise sources is expressed quantitatively as the sound pressure level. Sound pressure levels are defined in terms of decibels (dB), which are measured on a logarithmic scale. Sound can be quantified in terms of its amplitude (loudness) and frequency (pitch). Since the human ear cannot perceive all pitches or frequencies equally, measured noise levels in dB will not reflect the actual human perception of the loudness of the noise. Thus, the sound measures can be adjusted or weighted to correspond to a scale appropriate for human hearing. This adjusted scale, known as the A-weighted sound level in decibels (dBA), is useful for gauging and comparing the subjective loudness of sounds to humans.

Table 3.9-1 presents sounds encountered in daily life, their dBA levels, and how they affect hearing. For example, a whisper is usually 30 dBA and is considered to be very quiet, an air conditioning unit is considered an intrusive noise at 60 dBA, and the sound of a refrigerator at 55 dBA is considered at the level of ambient sound levels. Noise levels can become annoying at 80 dBA and very annoying at 90 dBA (USEPA 1981). In general, sounds at or below 70 dBA are generally considered safe. The USEPA and the World Health Organization recommend maintaining environmental noises below 70 dBA over 24-hours (75 dBA over 8-hours) to prevent noise-induced hearing loss. Over two hours of continuous noise levels between 80 dBA to 85 dBA can potentially lead to damage of hearing (CDC 2022).

The two most common types of noise are point sources and line sources. Point source noise is usually associated with a source that remains generally in one place for extended periods of time, for example most construction activities. Line source noise is generated by moving objects along a linear corridor, for example highway traffic noise. Noise generated by point and line sources have the potential to impact sensitive noise receptors, such as residences, hospitals, and schools. Persistent and escalating sources of sound are often considered annoyances and can interfere with normal activities, such as sleeping or conversation, such that these sounds could disrupt or diminish quality of life.

Potential noise levels at sensitive receptor locations resulting from stationary sources is usually evaluated for construction and normal operations by identifying sound levels from dominant noise-producing equipment, summing (using a logarithmic scale) anticipated equipment noise contributions, and applying fundamental noise attenuation principles. The standard reduction for a point source noise is 6 dB per doubling of distance from the source.

**Table 3.9-1. Sound Levels and Human Response**

Sound Level (dBA)	Effect	Outdoor	Indoor
30	Very quiet	Rustling leaves	Soft whisper (15 feet)
40	Quiet	Quiet residential area	Library
55	Ambient	Rainfall or light auto traffic (100 feet)	Refrigerator
60	Intrusive	Normal Conversation	Air conditioning unit (20 feet)
70	Telephone use difficult	Freeway traffic	Noisy restaurant or TV audio
80	Annoying	Downtown (large city)	Alarm clock (2 feet) or ringing telephone
90	Very annoying; hearing damage (8 hours)	Tractor, bulldozer, excavator	Garbage disposal
100	Very annoying	Garbage truck, motorcycle	Subway train
110	Strained vocal effort	Pile drivers	Power saw at 3 feet
120	Maximum vocal effort	Jet takeoff (200 feet) or auto horn (3 feet)	Rock concert
140	Painfully loud	Carrier deck jet operation	--

Source: USEPA 1981

dBA = A-weighted decibel

Generally, the level of traffic noise is increased by heavier traffic volumes, inclined roads, higher speeds, and greater numbers of trucks. In addition, there are other, more complicated factors that affect the loudness or attenuation of traffic noise, such as distance, terrain, and vegetation. Barriers, both manmade (e.g., sound walls) and natural (e.g., forested areas, hills, etc.), as well as other natural factors such as temperature and climate, may reduce noise levels. The standard reduction for line source noise is 3 dB per doubling of distance from the source (compared to 6 dB for point source noise) (USDOT 2018).

Standard buildings typically provide approximately 15 dB of noise reduction between exterior and interior noise levels (USEPA 1978).

**Noise Regulatory Framework.** The Occupational Health and Safety Act (OSHA’s) noise standard (29 CFR 1910.95) established workplace standards for noise. The minimum requirement states that constant noise exposure must not exceed 90 dBA over an 8-hour period. The highest allowable sound level to which workers can be constantly exposed is 115 dBA; exposure to this level must not exceed 15 minutes within an 8-hour period. The standards limit instantaneous exposure, such as impact noise, to 140 dBA. If noise levels exceed these standards, employers are required to provide hearing protection equipment that reduces sound levels to acceptable limits (OSHA 2019).

The Noise Control Act of 1972 (PL 92-574) directs federal agencies to comply with applicable federal, state, interstate, and local noise control regulations. In 1974, the USEPA provided information suggesting that a DNL of 55 dBA outdoors and 45 dBA indoors is the threshold above which noise could cause interference or annoyance. However, in 1982, the USEPA transferred the primary responsibility of regulating noise to state and local governments.

Chapter 8.28, “Noise,” under Title 8 (“Health and Safety”) of the City of Douglas’s Municipal Code regulates the control of unnecessary, excessive, and annoying sounds emanating from the city. The city’s noise regulations define noise sensitive zones as areas immediately surrounding schools, institutions of learning, libraries, places of religious worship, hospitals, nursing homes, and courts which conspicuously display signs indicating that those areas are so designated. Typically, the applicability of the city’s noise restrictions are based on the type of activity and its noise impact on noise sensitive zones and locations that are zoned or developed for residential use. The city’s noise regulations do not identify specific noise level thresholds, though generally state activities are prohibited if they produce: 1) excessive or disruptive noise; and 2) are continuous or intermittent for at least 15 minutes; or occur after 10:00 p.m. but before 6:00 a.m.; and 3) are plainly audible beyond the property line of the property on which conducted; and 4) disturbs the peace and quiet of a neighborhood or a reasonable person of normal sensibilities or special event. Construction work is exempt from these general provisions. Furthermore, the city can grant temporary exemptions for certain activities upon evaluating factors, such as the level of the sound to be generated by the activity, proximity to sensitive zones, and time the activity would take place (City of Douglas 2020).

For unincorporated areas in Cochise County, noise regulations are defined in the county’s zoning regulations and applicability of the regulations is based on the type of zoning of a property. Cochise County’s noise regulations do not identify specific noise level thresholds, except for noise due to wind energy turbines. Relevant noise regulations generally state that no noise, except for normal vehicular traffic, is allowed that is discernible on neighboring residential sites to the unaided human senses for three minutes or more duration in any one-hour of the day between the hours of 7:00 a.m. and 7:00 p.m. or 30-seconds or more duration in any one hour between the hours of 7:00 p.m. and 7:00 a.m. (Cochise County 2022b).

**Vibration Principles and Regulatory Framework.** Vibration refers to the oscillations or rapid linear motion of parts of a fluid or elastic solid whose equilibrium has been disturbed. Vibration can be caused by operating heavy farm or construction machinery, ground-breaking construction activities (e.g., drilling or excavating), trains on railways, operating equipment indoors, or slamming doors. Similar to noise, the sensitive receptors to outdoor vibrations include nearby residences, schools, hospitals, nursing home facilities, and recreational areas. Typically, the effects of vibration range from feeling the floor shake and rumbling sounds to minor structural damage. Vibration is often expressed in terms of the peak particle velocity, as inches per second or millimeters per second, when used to evaluate human annoyance and building damage impacts.

There are no federal standards for vibrations; however, various researchers and organizations have published guidelines. Table 3.9-2 presents guidelines to assess human perception and annoyance.

**Table. 3.9-2. Human Response to Vibration**

Human Response	Maximum Peak Particle Velocity (inches per second)	
	Transient Vibration	Steady State/Continuous Vibration
Barely perceptible	0.035	0.012
Distinctly perceptible	0.24	0.035
Strongly perceptible	0.9	0.10
Disturbing	NA	0.7 (at 2 Hz) – 1.7 (at 20 Hz)
Severe	2.0	NA
Very disturbing	NA	3.6 (at 2 Hz) – 0.4 (at 20 Hz)

Hz = Hertz; NA = Not Applicable

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/steady state sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Note: Hertz is the standard unit of frequency and measures the number of cycles per second.

Source: Caltrans 2013

Generally, vibrations start becoming a disturbance at 0.1 or 0.2 inches per second (Johnson 2015). Additionally, the Federal Transit Administration provides a standard threshold of 0.2 inches per second at which damage can occur for typical timber and masonry buildings (FTA 2018). Figure 3.9-1 presents the resulting vibration levels at corresponding distances for some construction equipment. The figure highlights that most of the standard equipment shown would not be considered a disturbance at a distance of 100 feet and beyond (assuming disturbance would begin at a peak particle velocity of 0.1 inches per second).

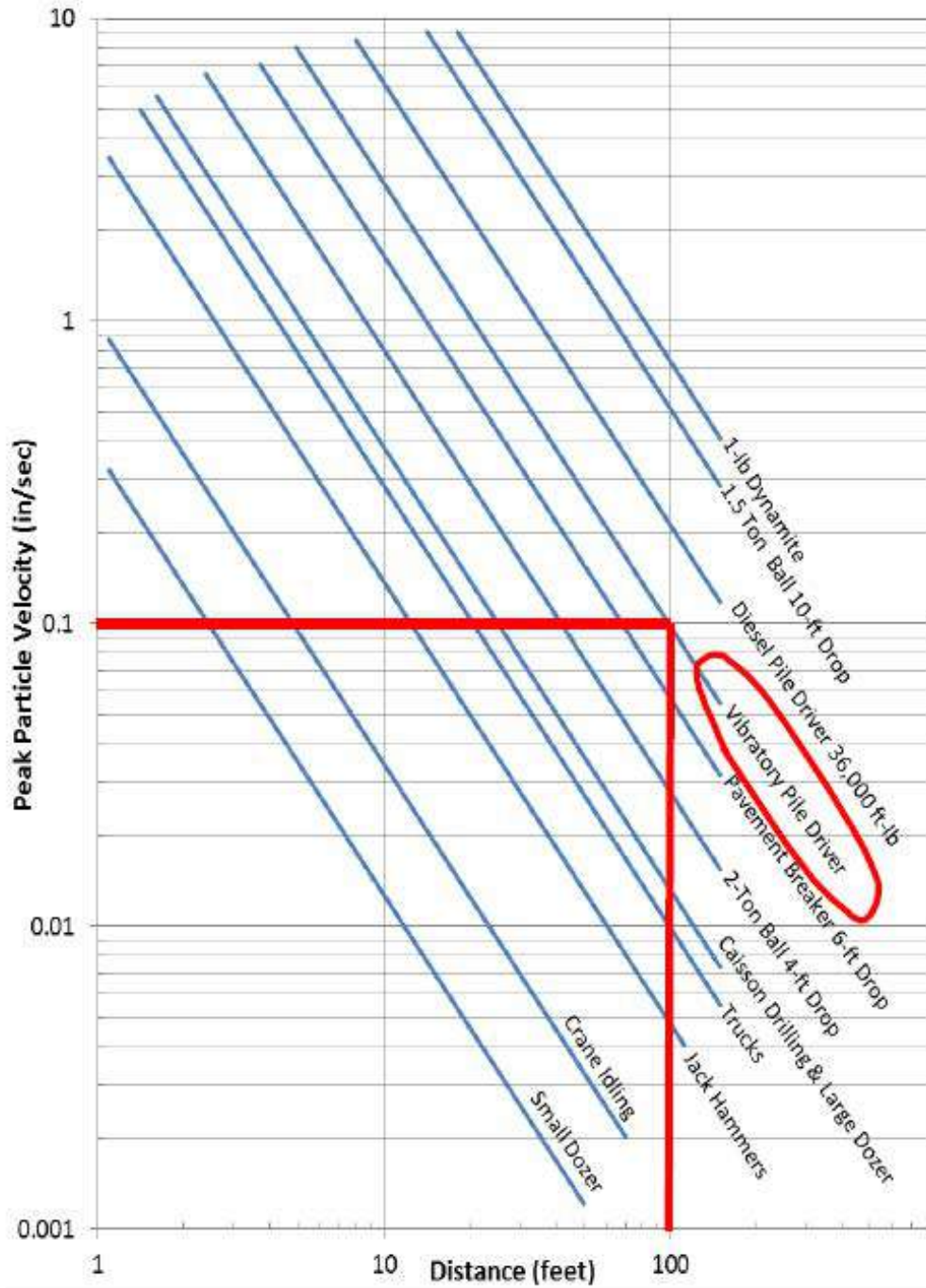


Figure 3.9-1. Vibration from Construction Equipment

(Source: Johnson 2015)

### **3.9.1.3 Existing Conditions**

#### **Commercial LPOE**

The proposed Commercial LPOE site and surrounding properties can be characterized as undeveloped, desert land on both the U.S. and Mexico sides. Primary noise sources in the region include vehicles traveling on SR-80, aircraft from nearby airports, and natural sources, such as wind. SR-80 is located approximately 1 mile north of the project area. An additional noise source near the project area is from intermittent vehicular noise as vehicles occasionally drive along International Avenue. The closest noise receptor to the proposed Commercial LPOE are three residential properties located 2,500 feet (1 property) and 5,500 feet (two properties) to the north of the project area along James Ranch Road. There are no other human sensitive receptors within 1 mile of the project area.

The project area can be accessed from James Ranch Road via SR-80 or from International Avenue via Kings Highway. James Ranch Road is primarily undeveloped with three residences located just south of its intersection with SR-80. Another residential property is located on James Ranch Road directly north of its intersection with SR-80. International Avenue is a dirt road located along the border fence and largely accessed by the U.S. Border Patrol.

As described in Section 3.8, Transportation and Traffic, SR-80 is a major 4-lane, thoroughfare in Cochise County and connects the proposed Commercial LPOE site to US-191 and the City of Douglas to the east and Cochise College and Bisbee to the west. US-191 is primarily a 2-lane highway that intersects SR-80 approximately 4 miles east of James Ranch Road. As US-191 extends north, it passes through the small towns of McNeal and Elfrida and then connects to Interstate 10.

Sensitive receptors located along SR-80, between James Ranch Road and US-191, include several residential properties. Sensitive receptors located along SR-80, between US-191 and Pan American Avenue, include a church, motel, city park, and several blocks of residential homes intermingled with commercial businesses. Sensitive receptors located along US-191 include a campground and a few residential properties.

#### **RHC LPOE**

Land uses immediately surrounding the RHC LPOE consist of commercial and industrial uses. On the Mexico side, adjacent properties include commercial and industrial buildings, parking lots, and a government building. The main contributor of noise in the vicinity of the existing port is vehicular traffic.

Vehicles entering and exiting the port often travel on Pan American Avenue, which is a major thoroughfare providing access to many commercial and industrial facilities in the city. Near the existing port, many shopping and commercial businesses are located directly west of Pan American Avenue. G Avenue travels through the city's downtown district, which is located 0.5 mile northeast from the RHC LPOE. Thus, traffic along these corridors are major sources of elevated sound levels in the city. Additionally, trucks processed at the port sometimes travel on 1<sup>st</sup> Street to industrial warehouses located along this road. These trucks contribute to loud, intermittent sound levels along these corridors, mainly during the port's operating hours for commercial vehicles (9:00 a.m. to 5:00 p.m., Monday through Friday).

The closest noise-sensitive receptors would be users of the Paseo de las Americas Linear Park located adjacent the western boundary of the port, which extends over 1 mile north along Pan American Avenue. Other nearby sensitive receptors include residential properties on 1<sup>st</sup> Street, approximately 160 feet east of the RHC LPOE (and directly 60 feet south of the port-owned parking lot on 1<sup>st</sup> Street); and residential properties, approximately 600 feet from the port-owned parking lot's eastern boundary. As the ROI expands out to the northeast from the existing port, it is generally dominated by residential neighborhoods. Other nearby sensitive receptors within the ROI include a hospital, church, park, and a school. Table 3.9-3 lists the sensitive receptors within the RHC LPOE ROI.

**Table 3.9-3. Noise-Sensitive Receptors Within 0.5 mile of the RHC LPOE**

Receptor Type	Receptor	Direction from RHC LPOE	Distance (feet)
Park	Paseo de las Americas Linear Park	West to North	0 to > 5,280
Residence	Residential Areas	East <sup>a</sup>	160
Residence	Residential Areas	Northeast	600
Park	3 <sup>rd</sup> Street Park	Northeast	700
Residence	Residential Areas	Northeast	750
Church	Templo Bethel	Northeast	750
Residence	Residential Areas	North, Northeast	800
Residence	Residential Areas	North, Northeast	850
Residence	Residential Areas	North, Northeast, East	900
Residence	Residential Areas	North, Northeast, East	950
Residence	Residential Areas	North, Northeast, East	1,000
Residence	Residential Areas	North, Northeast	>1,000 <sup>b</sup>
Hospital	Copper Queen Community Hospital – Rural Clinic	North	1,100
Hospital	Copper Queen Community Hospital	Northwest	1,500
Residence	Best Western Douglas Inn & Suites	North	1,600
Church	Church of God	Northeast	1,600
School	Center for Academic Success	Northeast	1,800
Church	Maranatha Church	Northeast	1,900
Preschool	Headstart Douglas	Northeast	1,900

RHC LPOE = Raul Hector Castro Land Port of Entry; ROI = region of influence

<sup>a</sup> Properties are directly 60 feet south of the port-owned parking lot on 1<sup>st</sup> Street and included in the Alternative 3 Expansion Area.

<sup>b</sup> Between 1,000 feet and 0.5 mile, land use is predominantly residential.

## 3.9.2 Environmental Consequences

### 3.9.2.1 Methodology

To evaluate the potential impacts from noise, GSA reviewed the project alternatives to determine whether any activities have the potential to cause the following within the ROI:

- Addition of new mobile and stationary noise sources;
- Conflict with any federal, state, or local noise ordinances; or
- Long-term perceptible increase in ambient noise levels above regulatory thresholds at sensitive receptors during operations.

A significant adverse impact resulting from projected-related noise would occur if the Proposed Action would result in:

- Harm or injury to adjacent communities or sensitive receptors (i.e., residences, schools, hospitals, etc.); or
- Exceed applicable environmental noise limit guidelines.

### 3.9.2.2 No Action Alternative

Under the No Action Alternative, GSA would not construct a new Commercial LPOE or expand and modernize the RHC LPOE. Ongoing maintenance at the RHC LPOE would occur, which could generate

intermittent increases in noise levels depending on the activity. Inspection of COVs would remain at the RHC LPOE and elevated, intermittent noise levels associated with COVs entering and existing the existing port would continue to occur at the RHC LPOE and through the City of Douglas, resulting in overall long-term, minor to moderate adverse noise impacts.

### 3.9.2.3 Alternative 1 – Sequential Construction

Under Alternative 1, construction of the proposed Commercial LPOE would result in short-term, minor to moderate, adverse noise impacts; and short-term, minor to moderate adverse noise impacts at the RHC LPOE. Operations would result in permanent, moderate adverse impacts at the proposed Commercial LPOE and receptors along SR-80 and US-191. There would be long term beneficial noise impacts; as well as long-term, minor, adverse, and indirect noise impacts near the RHC LPOE.

#### **Construction**

##### **Commercial LPOE**

Under Alternative 1, ambient noise levels within the vicinity of the proposed Commercial LPOE site would temporarily increase due to construction of the new facility. Noise levels would be elevated throughout the duration of construction, which is estimated to occur over a period of approximately 48 to 54 months. Construction activities would occur within hours that are in accordance with county noise ordinance to the extent practicable; however, some after-hours construction may be necessary to avoid subjecting construction workers to excessive heat conditions during daytime hours. Construction activities would involve site preparation, excavation, grading, hauling of debris and materials, and building construction. The specific types of construction equipment and methods are not yet known, although are anticipated to be typical of standard building construction activities. Table 3.9-4 presents typical construction equipment (mobile and stationary) and the corresponding noise levels.

**Table 3.9-4. Estimated Noise Levels from Construction Activities**

Equipment	Typical Noise Level at 50 feet (dBA)	Typical Noise Level at 500 feet (dBA)	Typical Noise Level at 1,000 feet (dBA)	Typical Noise Level at 1,500 feet (dBA)
Front Loader	80	60	54	50
Backhoe, excavator	80	60	54	50
Roller	85	65	59	55
Grader	85	65	59	55
Scraper	85	65	59	55
Truck	84	64	58	54
Concrete mixer	85	65	59	55

Source: Lamancusa 2009; USDOT 2018

dBA = A-weighted decibel

Depending on the phase of construction, equipment listed in Table 3.9-4 could be operated simultaneously. Table 3.9-5 presents typical noise levels during various construction activities and range from 78 to 89 dBA (at 50 feet), which would dissipate with distance. To estimate noise levels at nearby receptors, a conservative estimate of 90 dBA (at 50 feet) was used for the analysis by combining the noise levels of several pieces of construction equipment.

**Table 3.9-5. Noise Levels Associated with Outdoor Construction**

Construction Phase	dBA $L_{eq}$ at 50 feet from Source
Ground Clearing	84
Excavation, Grading	89
Foundations	78
Structural	85
Finishing	89

Source : USEPA 1973; Bolt et al. 1971

dBA = A-weighted decibels;  $L_{eq}$  = Equivalent Sound Level

The closest sensitive receptors to the construction site would be three residential properties located approximately 2,500 and 5,500 feet to the north. The estimated noise level resulting from construction activities would be approximately 56 dBA at the closest property line of these properties, which is considered below “intrusive” as listed in Table 3.9-1. Additionally, this sound level would be attenuated further when indoors, as standard buildings with windows and doors shut can reduce noise levels by approximately 15 dBA (USEPA 1978). OSHA regulations (i.e., wearing hearing protection and limiting exposure) would be followed to reduce the impact of noise on construction workers. Overall, construction of facilities at the proposed Commercial LPOE site is expected to have a minor adverse noise impact and would be short-term and intermittent.

Ambient noise levels along SR-80, US-191, and James Ranch Road would increase as a result of construction-related vehicles, as well as from construction workers commuting to and from the construction site. Short-term, minor to moderate adverse effects on sensitive noise receptors along these roadway corridors would be expected from the construction traffic as the truck transport would be intermittent, would primarily occur during typical business hours, and commuter traffic would be limited to daily construction start and end times.

**RHC LPOE**

Under Alternative 1, ambient noise levels within the vicinity of the RHC LPOE would increase due to construction activities resulting from the expansion and modernization of the existing port. Construction at the RHC LPOE is estimated to occur over a period of approximately 36 to 42 months, after the COV operations relocate to the new Commercial LPOE. Construction activities would occur within hours that are in accordance with the city’s noise ordinance to the extent practicable; however, some after-hours construction may be necessary to accommodate the 24/7 operations of the port and to avoid subjecting construction workers to excessive heat conditions during daytime hours. Construction activities would involve demolition, site preparation, excavation, grading, hauling of debris and materials, and building construction. The specific types of construction equipment and methods are not yet known, although are anticipated to be typical of standard building construction activities, as shown in Table 3.9-4. As with construction at the Commercial LPOE, equipment listed in Table 3.9-4 could be operated simultaneously depending on the phase of construction (refer to Table 3.9-5 for typical noise levels during various construction activities). As with construction at the Commercial LPOE, a conservative estimate of 90 dBA (at 50 feet) was used for analysis to estimate noise levels at nearby receptors by combining the noise levels of several pieces of construction equipment.

The closest noise-sensitive receptor to the RHC LPOE would be the users at the Paseo de las Americas Linear Park adjacent to the western boundary of the existing port. Users of the trail could experience intermittent construction noise as the trail gets closer to the RHC LPOE and may cause annoyance to the users. Additional nearby residential and commercial properties are located directly south of the port-owned parking lot on 1<sup>st</sup> Street, at a distance of 60 feet to 80 feet; and residential properties located northeast of



the port-owned parking lot on 3<sup>rd</sup> Street, at a distance of 600 feet. Estimated noise levels at these sites during construction are approximately 88 dBA to 86 dBA (for the receptors on 1<sup>st</sup> Street) and 68 dBA (for the receptors on 3<sup>rd</sup> Street). However, standard buildings with windows and doors shut would further reduce noise levels by approximately 15 dBA (USEPA 1978). Therefore, the estimated noise level from the combined construction equipment would reduce to 75 dBA and could result in 73 dBA to 71 dBA (for the receptors on 1<sup>st</sup> Street) and 53 dBA (for the receptors on 3<sup>rd</sup> Street) indoors. These estimated noise levels are based on a distance between the outer most boundaries between the receptor location and the project boundary. It is likely that the estimated noise levels would decrease further to safer indoor noise levels (i.e., 70 dBA or less) as most of the construction activities would not occur simultaneously and would be located away from the project boundary.

The closest receptors that could experience disturbance from construction vibration include the properties (residential and commercial) located on 1<sup>st</sup> Street, directly across the port-owned parking lot. The distances between these properties to the closest project boundary range from approximately 60 to 80 feet. At 60 feet, it is expected that most, if not all, construction activities would occur at a peak particle velocity of less than 0.1 or 0.2 inches per second, the threshold at which vibrations become a disturbance.

Construction noises and vibration could have minor to moderate noise impacts on the few nearby residences, particularly if after-hours construction is required; however, due to the nature of construction, the noise would be short-term and intermittent until the construction phase is over. Furthermore, increases in noise levels during construction at the RHC LPOE would be offset because of the relocation of COV operations to the new facility. As with construction at the Commercial LPOE, OSHA regulations (i.e., wearing hearing protection and limiting exposure) would be followed to reduce the impact of noise on construction workers.

Although construction would be temporary, potential noise impacts would be minimized to the extent possible by standard noise control measures, such as project scheduling, noise barriers, and using noise controls on equipment (e.g., mufflers). The majority of activities would be consistent with normal construction activities and would be conducted in accordance with the City of Douglas's noise ordinance to the extent practicable. If a variation from normal construction hours is required, a variance permit from the City of Douglas could be required. GSA would coordinate with nearby landowners east of the RHC LPOE to notify them of peak construction times and when the loudest equipment may be in use (see Section 3.9.2.6).

Ambient noise levels along Pan American Avenue, SR-80, and US-191 would increase as a result of an increase in construction-related vehicles and construction workers commuting to and from the construction site. Minor to moderate adverse effects on sensitive noise receptors along these roadway corridors would be expected from the construction traffic as truck transport would be intermittent, would generally occur during typical business hours, and commuter traffic would be limited to daily construction start and end times. Also, any additional increase in noise levels from construction-related traffic would be offset from the relocation of COVs to the new Commercial LPOE.

Because the plan for the expanded RHC LPOE (see Figure 2-4) incorporates Customs Avenue between Pan American Avenue and 1<sup>st</sup> Street into the expanded port, permanent closure of this segment of Customs Avenue would occur early during construction and would require rerouting of vehicular access to the businesses on 1<sup>st</sup> Street via G and H Avenues. Traffic levels on these avenues are low; small increases in traffic on these roadways would cause a long-term, negligible to minor, adverse impact on traffic noise along the local roadways. The relocation of COV traffic to the Commercial LPOE would also remove COVs from G and H Avenues that currently access the RHC LPOE via International Avenue. This would compensate for additional COVs that would use G and H Avenues after closure of the segment of Customs Avenue.

## **Operations**

### **Commercial LPOE**

Under Alternative 1, the proposed Commercial LPOE would be a new, permanent source of noise for the area due to vehicular traffic as COVs would enter and exit through this facility. It is anticipated that operations would occur within the hours of 6:00 a.m. and 10:00 p.m., Monday through Friday. Additionally, intermittent, elevated noise levels could potentially be heard from the onsite firing range facility; however, this would generally be limited to the immediate area of the range, as the facility would be enclosed and resulting noise impacts to the closest residence would be minimal. Ambient noise levels in the project area would permanently increase as a result of operations at the new Commercial LPOE and would be detectable to the three residential properties located on James Ranch Road. SR-80 (between James Ranch Road and US-191) and US-191 would experience an increase in intermittent noise levels from the COVs during operating hours. Adverse noise impacts resulting from the operation of the Commercial LPOE are expected to be moderate and permanent.

### **RHC LPOE**

Under Alternative 1, ambient noise levels at the RHC LPOE, Pan American Avenue, and SR-80 (between US-191 and Pan American Avenue) are initially expected to decrease as a result of the relocation of COVs to the new Commercial LPOE which would result in a long-term beneficial noise impact to sensitive receptors along these roadway corridors.

Although vehicular traffic volumes would initially experience a net decrease because of the removal of the COVs, it is uncertain how the increased efficiency of the modernized port would impact future traffic volumes. Because the LPOE would be upgraded, there would be more POVs passing through per hour as processing times would decrease. For purposes of the traffic analysis, a conservative growth rate of 2% was used to estimate the increase in POV traffic volumes (see Section 3.8.1.3). This increase in vehicles passing through would likely generate more noise than current POV levels with many vehicles idling while waiting to be processed. Over the long term, as the City of Douglas continues to grow, the number of POVs on roadways could increase; thus, overall POV traffic passing through the LPOE could also increase, along with the increased noise that would come with increased traffic resulting in long-term, minor, adverse and indirect noise impacts.

As described for construction above, permanent closure of Customs Avenue between Pan American Avenue and 1<sup>st</sup> Street for the expanded RHC LPOE footprint would cause a long-term, negligible to minor, adverse impact on traffic noise along local roadways as a result of rerouting vehicular access to the businesses on 1<sup>st</sup> Street via G and H Avenues.

### **Alternatives 1a – 1d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 1a through 1d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.1.2.1. Type and intensity of adverse noise impacts are associated with construction activities and would depend on the sub-alternative chosen:

- Alternative 1a would involve reusing the existing historic structures and noise impacts would result from some construction activities outdoors, but mostly taking place indoors with renovation work. Temporary, negligible adverse impacts would be expected and would be limited mainly to construction workers.
- Alternative 1b would involve the relocation of the historic structures and noise impacts would mainly result from heavy-duty machinery used to lift and move the structures and from typical construction activities and equipment, such as excavators, used to prepare and construct a building foundation. Temporary, intermittent minor adverse noise impacts would be expected and would be limited to construction workers and facility employees.

- Alternative 1c would involve the demolition of the historic structures and noise impacts would be greatest under this sub-alternative in comparison to Alternatives 1a and 1b. Major noise sources would include heavy-duty equipment, such as excavators, and trucks hauling debris from the demolition site. Temporary, intermittent minor adverse noise impacts would be expected and would affect construction workers, facility employees, and a couple of residential properties located less than 200 feet east of the RHC LPOE.
- Alternative 1d would involve a combination of Alternatives 1a through 1c and the type of noise impacts would be similar to those previously discussed under each sub-alternative; the extent would occur within the range of noise levels that would result from Alternatives 1a, 1b, or 1c.

### **3.9.2.4 Alternative 2 – Concurrent Construction (Westward Expansion)**

Under Alternative 2, construction of the proposed Commercial LPOE would result in short-term, minor to moderate, adverse noise impacts. Construction at the RHC LPOE would result in short-term, moderate, adverse noise impacts. Operations would result in permanent, moderate adverse noise impacts at the proposed Commercial LPOE and receptors along SR-80 and US-191. There would be long term beneficial noise impacts; as well as long-term, minor, adverse, and indirect noise impacts near the RHC LPOE.

#### **Construction**

Under Alternative 2, impacts to ambient noise levels during construction of the Commercial LPOE would be the same as those discussed under Alternative 1.

At the RHC LPOE, adverse noise impacts from construction would occur within the vicinity of the port, similar to those discussed under Alternative 1 and would include the impacts described for the Alternative 1 Expansion Area. However, because construction of the Commercial LPOE and RHC LPOE would occur simultaneously under Alternative 2, COV processing at the RHC LPOE would not be relocated until approximately 48 to 54 months after construction begins; construction at the RHC LPOE would occur while COV still remained onsite for processing. Therefore, ambient noise levels under Alternative 2 construction would be higher than those discussed under Alternative 1 as it includes the COV traffic noise. Intermittent elevated noise levels from the COVs would occur in addition to the construction noise at the RHC LPOE and would result in short-term, intermittent, moderate adverse impacts to workers at the facility and to sensitive noise receptors as identified in Alternative 1. Although construction would be temporary, potential noise impacts at the RHC LPOE would be minimized to the extent possible by standard noise control measures, similar to those discussed under Alternative 1.

Similar to Alternative 1, ambient noise levels along Pan American Avenue, SR-80, and US-191 would increase from construction-related vehicles, as well as commuting construction workers under Alternative 2. However, since the processing of COVs would remain at the existing port under Alternative 2 until the Commercial LPOE is open, these roads would continue to experience the COV traffic, in addition to construction-related trucks and commuter cars for the construction at the RHC LPOE. As such, noise levels on these roadways during RHC LPOE construction as discussed for Alternative 1 would be greater under Alternative 2 for the initial 36 to 42 months of construction, after which construction at the RHC LPOE would be complete. Impacts from increased noise levels on roadways would be short-term, minor to moderate, and adverse.

#### **Operations**

Under Alternative 2, impacts to ambient noise levels during operations of the Commercial LPOE would be the same as those discussed under Alternative 1.

Potential noise impacts at the modernized RHC LPOE under Alternative 2 would be similar to those discussed under Alternative 1. Ambient noise levels at the RHC LPOE, along Pan American Avenue and along SR-80 (between Pan American Avenue and US-191) are expected to initially decrease as a result of

the relocation of COVs to the new Commercial LPOE and represents a long-term beneficial noise impact to sensitive receptors along these roadways and within the City of Douglas. This benefit would occur after construction of the Commercial LPOE is completed. However, there could be a long-term, minor to moderate, adverse, and indirect noise impact from increased efficiency of the RHC LPOE leading to increased traffic.

### **Alternatives 2a – 2d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 2a through 2d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.2.1. Under Alternatives 2a through 2d, noise impacts during construction would be similar to those described under Alternatives 1a through 1d.

#### **3.9.2.5 Alternative 3 – Concurrent Construction (Eastward Expansion)**

Under Alternative 3, construction of the proposed Commercial LPOE would result in short-term, minor to moderate, adverse noise impacts. Construction at the RHC LPOE would result in short-term, moderate, adverse noise impacts. Operations would result in permanent, moderate adverse noise impacts at the proposed Commercial LPOE and receptors along SR-80 and US-191. There would be long term beneficial noise impacts; as well as long-term, minor, adverse, and indirect noise impacts near the RHC LPOE.

#### **Construction**

Under Alternative 3, impacts to ambient noise levels during construction of the Commercial LPOE would be the same as those discussed under Alternative 1.

Adverse noise impacts from construction at the RHC LPOE for Alternative 3 generally would be similar to as described above for Alternative 2 and would include the impacts described for the Alternative 1 Expansion Area. Therefore, ambient noise levels under Alternative 3 construction would be higher than those discussed under Alternative 1 as they include traffic noise from COVs remaining on site during construction. Intermittent elevated noise levels from the COVs would occur in addition to the construction noise at the RHC LPOE and would result in short-term, intermittent, moderate adverse impacts to workers at the facility and to sensitive noise receptors as identified in Alternative 1. Although construction would be temporary, potential noise impacts at the RHC LPOE would be minimized to the extent possible by standard noise control measures, similar to those discussed under Alternative 1.

Demolition and construction at the Alternative 3 Expansion Area would occur closer to the downtown area of the city. Adjacent areas north of 1<sup>st</sup> Street are characterized by light industrial and commercial businesses. East of the expansion area are commercial lands to E Avenue, which are vacant between the expansion area and H Avenue. The Alternative 3 Expansion Area is closer to some of the sensitive noise receptors northeast of the RHC LPOE listed in Table 3.9-3 but separated from these receptors by light industrial and commercial businesses on those lands.

Similar to Alternative 1, ambient noise levels along Pan American Avenue, SR-80, and US-191 would increase from construction-related vehicles, as well as commuting construction workers under Alternative 3. However, similar to Alternative 2, since the processing of COVs would remain at the existing port under Alternative 3 until the Commercial LPOE is open, these roads would continue to experience the COV traffic, in addition to construction-related trucks and commuter cars for the construction at the RHC LPOE. As such, noise levels on these roadways during RHC LPOE construction as discussed for Alternative 1 would be greater under Alternative 3 for the initial 36 to 42 months of construction, after which construction at the RHC LPOE would be complete. Impacts from increased noise levels on roadways would be short-term, minor to moderate, and adverse.

#### **Operations**

Under Alternative 3, impacts to ambient noise levels during operations of the Commercial LPOE would be the same as those discussed under Alternative 1.

Potential noise impacts at the modernized RHC LPOE under Alternative 3 would be similar to those discussed under Alternative 1. Ambient noise levels at the RHC LPOE, along Pan American Avenue and SR-80 (between Pan American Avenue and US-191), are expected to initially decrease as a result of the relocation of COVs to the new Commercial LPOE and represents a long-term beneficial noise impact to sensitive receptors along these roadways and within the City of Douglas. This benefit would occur after construction of the Commercial LPOE is completed. However, there could be a long-term, minor to moderate, adverse, and indirect noise impact from increased efficiency of the RHC LPOE leading to increased traffic.

### **Alternatives 3a – 3d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 3a through 3d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.2.1. Under Alternatives 3a through 3d, noise impacts during construction would be similar to those described under Alternatives 1a through 1d.

#### **3.9.2.6 Impact Reduction Measures**

Noise impacts would be minimized to the extent possible through various measures, including:

- Implementation of noise control measures, such as project scheduling, noise barriers, and using noise controls on equipment (e.g., mufflers).
- Conducting construction activities within hours that are in accordance with local noise ordinances to the extent practicable.
- If a variation from normal construction hours is required, a variance permit from the City of Douglas or Cochise County would be obtained.

All construction activities would comply with the City of Douglas's and Cochise County's noise ordinance.

In addition, GSA would provide notification to properties adjacent to the project boundary in advance of times of peak construction when the use of loudest equipment would be used for longer periods of time (e.g., use of jackhammers, excavators, and pavement breakers). Construction activities that could trigger notification may include site preparation, earthwork, and shoring/foundational work. Notification would include, at a minimum, a brief description of the activity, length of the activity, and contact information.

## **3.10 INFRASTRUCTURE AND UTILITIES**

This section assesses the potential for existing utilities and support infrastructure within the vicinity of the RHC LPOE site and the proposed Commercial LPOE site to affect, or be affected by, implementation of the Proposed Action, including the alternatives as discussed in Chapter 2. Infrastructure refers to the roadway network and facilities at the RHC LPOE; utilities refer to the water and sewer, natural gas, electricity, stormwater systems, and communication systems at or near the RHC LPOE and proposed Commercial LPOE site.

### **3.10.1 Affected Environment**

#### **3.10.1.1 Region of Influence**

For purposes of this analysis, it is assumed that the ROI includes utilities utilized by the RHC LPOE and any other utilities located on or adjacent to the RHC LPOE site and the proposed Commercial LPOE site. Existing utilities and support infrastructure located in the ROI, primarily within local roadways and the existing RHC LPOE site, include water and sewer, natural gas, electricity, communications and stormwater, and are discussed below.

#### **3.10.1.2 Regulatory Setting and Requirements**

GSA's P100 Standards outline criteria for the following: general requirements; urban development and landscape design; architecture and interior design; structural and civil engineering; mechanical engineering; electrical engineering; fire protection; and design standards for specialty spaces. The proposed Commercial LPOE and RHC LPOE would be subject to a building code, either one adopted by the City of Douglas, or one adopted by GSA.

Section 438 of the EISA of 2007 specifies that federal agencies are required to reduce stormwater runoff from federal development and redevelopment projects to protect water resources. Federal agencies can comply using a variety of stormwater management practices often referred to as "green infrastructure" or "low impact development" practices, including reducing impervious surfaces and using vegetative practices, porous pavements, cisterns and green roofs.

LEED certification is a third-party green building certification program and the globally recognized standard for the design, construction and operation of high-performance green buildings and neighborhoods. LEED Gold certification requires at least 60 points across any combinations of carbon, energy, water, waste, transportation, materials, health and indoor environmental quality credits in the LEED Green Building Rating System for New Construction & Major Renovations (LEED-NC), Version 4.

CEQ's *Guiding Principles for Sustainable Federal Building* provides guidance for federal building construction to ensure federal buildings:

- Employ Integrated Design Principles;
- Optimize Energy Performance;
- Protect and Conserve Water;
- Enhance the Indoor Environment;
- Reduce the Environmental Impact of Materials; and
- Assess and Consider Building Resilience.

### **3.10.1.3 Existing Conditions**

#### **Commercial LPOE**

The proposed Commercial LPOE site is located on rural, undeveloped land. The project area is relatively flat with gentle drainage to the north. There are no established utility connections in the area for sewer, water, natural gas, electric, or communications. The only major infrastructure in the area includes that associated with a U.S. Border Patrol Station built in 2003 at the intersection of SR-80 and Kings Highway. The city and county currently have plans for utility improvements near the proposed Commercial LPOE to support development of the new port as well as other adjacent areas, as discussed in Chapter 4, Cumulative Impacts.

Roads in the vicinity of the proposed Commercial LPOE include James Ranch Road to the north, which is mostly unimproved and connects to SR-80, and International Ave, which is an unimproved road that runs adjacent to the border fence and connects with Kings Highway, a mile west of the project area. There are plans for James Ranch Road to be improved and extended to the project area by ADOT, as discussed in Chapter 4, Cumulative Impacts.

#### **RHC LPOE**

##### ***Facilities***

The RHC LPOE consists of a commercial processing facility, POV and pedestrian processing facility, and historic Garage, which serves as a maintenance building. The commercial processing facility includes an office building, two primary inspection booths, a storage warehouse, a secure storage facility, canine kennels, and a canopy structure over the booths and docks. The POV and pedestrian processing facility includes the Main Building; primary pedestrian inspection area; headhouse and Secondary Inspection facilities.

The Main Building and Garage were constructed in 1933. The Main Building includes is a two-story structure with a basement, containing single-story north and south annexes. Renovations were made to the RHC LPOE in 1993 to include commercial processing, as well as pedestrian inspection. Updates to the pedestrian processing area began in 2018, which included upgrades to pedestrian booths, and the addition of a permanent third lane. Additional renovation work in the pedestrian processing area included polished concrete floors, wooden door replacement, painting, and other minor improvements.

A Feasibility Study was completed in 2019 to evaluate the condition of the RHC LPOE and to identify the needs and deficiencies in anticipation of its modernization (GSA 2019a). The study showed that the RHC LPOE has outdated facilities and technology, general issues with the site layout, limited space for expansion, and insufficient interior space for offices and processing. As a temporary solution, a standalone modular unit was constructed in the existing parking lot behind the Main Building.

An asbestos-containing material (ACM) and lead-containing paint survey was conducted in March of 2020 and August of 2022. The survey identified ACM in the Main Building on floor tile on the first floor and pipe lagging in the basement. Lead-containing paint and lead-based paint (LBP) were found in the Main Building and Garage. Further information on ACM and LBP is provided in Section 3.13, Human Health and Safety.

Commercial and industrial warehouses are located directly to the east and north of the existing RHC LPOE, and border infrastructure directly to the south. The land to the west of Pan American Avenue is primarily vacant with the exception of some pedestrian pathways and is separated from the existing LPOE by inbound and outbound traffic.

### **Roadway Networks**

Roadways in the vicinity of the RHC LPOE include Pan American Avenue, seven POV entry lanes, 1<sup>st</sup> Street, North Customs Avenue (which transitions into International Avenue) to the south, East 3<sup>rd</sup> Street to the north, and various unnamed paved driveways and parking areas at the RHC LPOE.

Pedestrian access from the south, across the border, requires crossing traffic lanes where vehicles queue to enter the primary inspection area. Once across traffic, pedestrians enter into an outdoor mall/queuing area and proceed into the Main Building pedestrian inspection area.

Incoming commercial and non-commercial vehicle traffic queue along the border, moving east to west on Calle Internacional. The closest inspection booth is closed, as most large vehicles are unable to make the turn into this lane. The northernmost lane is dedicated to commercial traffic only. Once inside the Commercial Lot, trucks have very little space to maneuver into the dock area. There is also limited space for Vehicle and Cargo Inspection Systems inspections (GSA 2019a).

The 2019 Feasibility Study determined that the current road configuration results in inefficient pedestrian and vehicle traffic flow and puts a large demand on existing road infrastructure (GSA 2019a). Traffic from the RHC LPOE is routed into the city, which often leads to traffic congestion.

### **Water and Sewer**

The City of Douglas provides water service to approximately 16,000 people in the city, sourced from a groundwater supply from the Douglas Groundwater Basin-fill aquifer. The system uses four operating storage tanks and six wells, and service is divided into two different pressure zones (Stantec 2020). The RHC LPOE is served by the Low Zone for lower elevations in the city and is connected with four-inch water lines. The High Zone serves development at higher elevations of the city. Monthly water usage data in 2019 indicate that the total annual water demand for the City of Douglas that year was approximately 990 million gallons (or 3,000 acre-feet) (Stantec 2020). The city identified that the existing wells are not able to meet current system needs and determined that improvements are necessary. The city is looking into increasing well source capacity, including potentially constructing new wells or rehabilitating existing city wells. There are several inactive city wells due to long-term decreases in the water table. Based on recent water use reports, current annual water consumption at the RHC LPOE is estimated at approximately 900,000 gallons (3 acre-feet) (CBP 2022, GSA 2022c).

Wastewater in the city is processed at the City of Douglas WWTP, located on West International Avenue approximately 2,600 feet west of the RHC LPOE. The City of Douglas completed upgrades to the WWTP in 2021 and the maximum wastewater treatment capacity is 3.1 million gallons per day (City of Douglas 2021b); however, the ADEQ permit for the WWTP average day flow is 2.6 million gallons per day (Stantec 2022). Treated effluent from the city's WWTP is discharged under the permit to the Rio Agua Prieta in Mexico, where it is used for irrigation. From 2019 to 2021, the average annual day flow into the WWTP ranged from 1.6 to 2.0 million gallons per day, with average day maximum month flows ranging from 2.1 to 2.3 million gallons per day (Stantec 2022). Wastewater generated at the RHC LPOE is typical of standard domestic wastewater and is generated from the use of bathroom sinks, showers, toilets, kitchen sinks, and dishwashers. Based on a typical sewage flow rate of 16 gallons per day per worker, it is estimated that the wastewater generated at the RHC LPOE is approximately 3,000 gallons per day (CBP 2022, PCS 2014).

### **Natural Gas/Electrical**

Natural gas is provided to homes and businesses in the City of Douglas by Southwest Gas, who recently upgraded their gas lines (City of Douglas 2018). During a Phase I Environmental Site Assessment conducted for this project (GSA 2022b), an El Paso Natural Gas Easement and Southwest Gas natural gas pipeline was observed across the northern end of the Alternative 2 Expansion Area, traveling east-west from a natural gas compressor station located directly west of the expansion area.



Electrical service to the RHC LPOE is provided by the Arizona Public Service. Upgrades were made in 2018, including implementation of redundancy capabilities (City of Douglas 2018).

Current annual gas consumption at the RHC LPOE is estimated at approximately 700,000 cubic feet, and electricity consumption is approximately 1.3 million kilowatt hours (GSA 2022c).

### **Stormwater Drainage**

Stormwater in the City of Douglas is collected through the MS4 system, which is separate from the sanitary sewer system. Stormwater is left untreated before being discharged into Whitewater Draw (City of Douglas 2018c). The MS4 outfall location is approximately 2.6 miles northeast of the RHC LPOE.

The RHC LPOE is relatively flat with gentle drainage to the west. During a Phase I Environmental Site Assessment conducted for this project, the site reconnaissance team observed storm drains located throughout the site (GSA 2022b). The site has historically experienced flooding events, especially areas along 1<sup>st</sup> Street and in the Cargo Lot; however, a drainage correction project at the RHC LPOE was implemented within the last 5 years and has since resolved any stormwater issues (Luttrell 2022). GSA personnel indicated that all stormwater from the site is collected via catch basin and is discharged into a stormwater channel on the western boundary of the site that drains into an unnamed branch of the Whitewater Draw. Based on an aerial review of the site, all 6 acres of the RHC LPOE are developed or paved areas, (i.e., buildings, roads, or parking areas).

The Alternative 2 Expansion Area is primarily undeveloped land. During the Phase I Environmental Site Assessment, it was identified that a portion of the expansion area was recently remediated following the closure of a 3.5-acre manufactured gas site and the site was observed to have a paved, concrete cap. Other paved walkways associated with a city park are also in this area.

The Alternative 3 Expansion Area consists of developed land with buildings, other structures, paved areas, and disturbed vacant areas with soils compacted during prior uses. To the south of this area spanning across International Ave is a grated street drain discharging into a regulatory floodway on the other side of the RHC LPOE (GSA 2023a).

### **Communications Systems**

Cox Communication is the main communications provider in the City of Douglas, offering high-definition cable, fiber optic accessibility, and high-speed broadband (City of Douglas 2018).

## **3.10.2 Environmental Consequences**

This section describes the infrastructure and utilities located in the ROI that would be impacted under each alternative.

### **3.10.2.1 Methodology**

To evaluate the impacts on utilities and infrastructure, GSA reviewed the project alternatives to determine whether any activities have the potential to cause the following within the ROI:

- Alteration of intended use and/or placement of facilities;
- Disruption to utility operations during construction activities; or
- An increase or decrease in demand for utility services during construction or operations.

A significant adverse impact to utilities and infrastructure would occur if the Proposed Action would result in:

- Substantial damage to nearby facilities;
- Long-term disruption of utility operations;

- Negatively affect local and regional utility supplier's ability to meet customer demands; or
- Require substantial public utility system updates.

### **3.10.2.2 No Action Alternative**

Under the No Action Alternative, GSA would not construct a new Commercial LPOE or expand and modernize the RHC LPOE. Therefore, site conditions would remain as they currently exist and no construction, renovation, or demolition activities would occur. Conditions of the facilities conditions would continue to impede CBP personnel productivity and threaten the success of CBP's mission. Additionally, the RHC LPOE would not benefit from updated facilities and infrastructure with LEED certification, designed to accommodate renewable energy sources and achieve sustainable standards.

### **3.10.2.3 Alternative 1 – Sequential Construction**

Under Alternative 1, construction of the proposed Commercial LPOE would result in short-term, moderate, adverse impacts to facilities; and short-term, negligible adverse impacts to utilities. At the RHC LPOE, there would be short-term, moderate adverse impacts on facilities; and short-term, negligible to minor adverse impacts to utilities.

Operations would result in long-term, moderate, beneficial impacts to facilities; and long-term negligible to minor adverse impacts to public utilities from increased demand at the proposed Commercial LPOE. There would be long-term, moderate, beneficial impacts to facilities, and long-term, negligible to minor adverse impacts to utilities at the RHC LPOE.

## **Construction**

### ***Commercial LPOE***

As there are no existing facilities at the proposed Commercial LPOE site, there would be no impacts to facilities during construction. International Avenue may experience short-term, moderate impacts during construction from vehicle and equipment access. Refer to Chapter 4 for a discuss of impacts to James Ranch Road. Under Alternative 1, there would be overall negligible impacts on utilities providers from construction-related activities. Under a separate action, the City of Douglas is planning to drill a groundwater well to support construction of the Commercial LPOE, as well as other planned development in the area. Therefore, there would be negligible impacts to water utility providers. Refer to Section 3.6, Water Resources and Chapter 4, Cumulative Impacts for a discussion on groundwater impacts. There would be a short-term and negligible increase in demand for wastewater services during construction from hauling of portable toilets and other wastewater generated offsite.

It is assumed any electricity needs (e.g., for construction trailers) would be provided by the City of Douglas through tie-ins to temporary power lines; however, it is anticipated that the increased demand would be negligible on electrical providers. There would not be any increase in demand for natural gas or telecommunication services during construction. As discussed in Section 3.6, Water Resources, new development would be required to comply with City of Douglas General Plan stormwater requirements which requires all development or redevelopment projects, where applicable and feasible, to reduce water use, provide retention, and reduce oil pollutants at the source (City of Douglas 2018a).

Regarding proposed connections to existing utility lines, disruptions to existing utilities are not anticipated during construction as there are no utilities at the Commercial LPOE site. Reviews of utility mapping and coordination with utility companies would be conducted as appropriate. ADOT's James Ranch Road extension project is anticipated to provide existing ROW for utility connections to the proposed new Commercial LPOE. Electricity would be connected to the project area via Arizona Public Service to a nearby power source along James Ranch Road. For water and wastewater utilities, GSA would tie into new service lines via the James Ranch Road ROW, pending establishment of water and wastewater utility connections in the surrounding area. The extension of these utilities to the project area would be part of

larger development planning efforts in the region by a consortium of partners (including Cochise County, the City of Douglas, etc.) that are not a part of GSA's action (refer to Chapter 4 for a discussion of cumulative impacts from the James Ranch Road widening action; as well as electric, sewer, and water utility connection projects). Precise locations of proposed utilities for the new building are dependent on final design and would be installed in coordination with each utility company to ensure appropriate design and capacity for the utility connection to the proposed facilities. Any new utility connections would be established only after securing the appropriate approvals from utility providers.

### **RHC LPOE**

Under Alternative 1, expansion and modernization of the RHC LPOE would result in short-term, moderate adverse impacts on facilities, to include nearby roadways, during construction. Construction in the Alternative 1 Expansion Area would require permanent closure of Customs Avenue between Pan American Avenue and 1<sup>st</sup> Street to implement the new site plan for the expanded RHC LPOE. Existing LPOE facilities would be demolished and replaced new modernized facilities for POV and pedestrian processing, constructed to current GSA standards. Construction would occur in a phased approach while the RHC LPOE continued to operate, which could adversely affect facility functioning; however, the same phased approach would also minimize overall adverse impacts on service capabilities, vehicle and pedestrian wait times, and traffic compared to complete closure of the LPOE.

Construction at the RHC LPOE would have short-term, negligible adverse impacts on utility providers during construction. Onsite water uses may be used to control fugitive dust generation but would result in short-term, negligible adverse impacts to water utilities. There would be a temporary and negligible increase in demand for wastewater services during construction from hauling of portable toilets and other wastewater generated offsite. Electricity for construction may tie into nearby sources but would not be anticipated to result in more than negligible impacts. No impacts to natural gas or telecommunications services are anticipated.

Construction at the RHC LPOE (including activities such as excavation, drilling, and other above- and below-ground work) would have the potential to cause intermittent, minor adverse impacts to utility lines within the project area near the RHC LPOE. Existing utility maps would be reviewed and, where needed, utility companies would be contacted to identify any locations where construction activities have the potential to affect utility lines. Potential impacts would be avoided by coordinating with responsible utility providers in advance of such activities and by either implementing measures to protect existing utility lines, or by arranging for their temporary or permanent relocation.

### **Operations**

#### **Commercial LPOE**

Alternative 1 would result in a long-term, moderate beneficial impact on facilities. Newly constructed facilities would provide new utilities and infrastructure built and maintained to GSA standards that would support CBP operations and improve the efficiency of the processing of COVs. Long-term beneficial impacts to local roadways in the City of Douglas would occur from the relocation of commercial processing to a new port, as the rerouting of commercial traffic would reduce the burden on existing road networks near the RHC LPOE.

Under a separate action, the City of Douglas is planning to build a new water system to include a water well in the project vicinity to support the proposed Commercial LPOE, as well as other planned development in the area. Long-term, minor adverse impacts to water utilities are expected. Refer to Section 3.6, Water Resources and Chapter 4, Cumulative Impacts for a discussion on the potential impacts to the regional water supply.

Additionally, the City of Douglas plans to construct new wastewater infrastructure, including lift stations and wastewater lines along James Ranch Road and SR-80 to connect to the city's existing WWTP, to

support potential development in the area near and including the proposed Commercial LPOE. Because the proposed Commercial LPOE would connect to the city's planned wastewater system, which would ultimately connect to the city's WWTP, long-term, minor adverse impacts are expected from increased wastewater generation. It is estimated that the overall project would result in approximately 200 additional new workers, of which 100 workers would be located at the proposed Commercial LPOE and could result in an incremental increase of approximately 1,600 gallons per day of wastewater generated from the Commercial LPOE (based on a typical sewage flow rate of 16 gallons per day per worker [PCS 2014]). This represents approximately 0.1 percent of recent average annual day flow measurements at the city's WWTP (average annual day flow of 1.6 million gallons per day in 2021 [Stantec 2022]).

There would also be long-term increases in demand for electricity, natural gas, and telecommunication services from the operation of the new Commercial LPOE. Overall increases in demand for service are anticipated to be negligible to minor and not substantially affect utility providers.

New buildings would be designed to comply with current building codes as well as P100 Standards. Energy and water efficiency measures would be incorporated into design as a part of LEED certification which would minimize impacts from increased utility demands. Potential future use of onsite renewable energy systems would reduce energy demands in the long term if implemented (see Section 3.10.2.6).

Stormwater would be managed on site per city and county stormwater management requirements (see Section 3.6, Water Resources); additional stormwater management measures may be implemented to achieve LEED certification. Therefore, there would be no impacts to stormwater utility providers.

### **RHC LPOE**

Newly constructed facilities would optimize and streamline CBP operations at the RHC LPOE, similar to as described for the Commercial LPOE. Expanded and modernized facilities would provide new utilities and infrastructure built and maintained to GSA standards that would support CBP operations and improve the efficiency of pedestrian and POV processing. The creation of FAMU/UAC Processing and additional parking would provide improved conditions for CBP personnel as well as enhancing traveler comfort. The upgraded storm water drainage system would minimize the potential risk of flooding at the RHC LPOE. Alternative 1 would result in a long-term, moderate beneficial impact on facilities.

Long-term, minor adverse impacts to the City of Douglas's municipal water system are expected from increased water demand from approximately 100 additional new workers at the RHC LPOE. The new workers could result in an incremental increase of 1.5 acre-feet per year in water demand on the city's existing system based on recent usage rates at the existing RHC LPOE. This represents less than 0.1 percent of the recent total water demand on the City of Douglas's existing water system. Refer to Section 3.6, Water Resources and Chapter 4, Cumulative Impacts for a discussion on the potential impacts to the regional water supply.

Similar to as discussed under operational impacts from the proposed Commercial LPOE, long-term, minor adverse impacts to the City of Douglas's existing WWTP are expected from operations of the RHC LPOE. It is estimated that the overall project would result in approximately 200 additional new workers, of which 100 workers would be located at the RHC LPOE and could result in an incremental increase of approximately 1,600 gallons per day of wastewater generated from the RHC LPOE (based on a typical sewage flow rate of 16 gallons per day per worker [PCS 2014]). This represents less than 0.1 percent of recent average annual day flow measurements at the city's WWTP (average annual day flow of 1.6 million gallons per day in 2021 [Stantec 2022]). Overall, operations at the RHC LPOE combined with the proposed Commercial LPOE would represent approximately 0.2 percent of recent average annual day flow measurements at the city's WWTP.

There would also be long-term increases in demand for electricity, natural gas, and telecommunication services from the operation of the RHC LPOE. Overall increases in demand for service are anticipated to be negligible and to not substantially affect utility providers.

New buildings would be designed to comply with current building codes, P100 Standards, and would have LEED Gold certification at a minimum, similar to the proposed Commercial LPOE. Increases in utility demand from an increase in employees working on site, would be partially offset with efficiency improvements associated with LEED construction. The extent of impacts on utility providers would depend on overall usage and extent of efficiency improvements, but operations of the RHC LPOE is not anticipated to noticeably affect utility providers' ability to deliver service.

Stormwater would be managed on site per city and county stormwater management requirements (see Section 3.6, Water Resources); additional stormwater management measures may be implemented to achieve LEED certification. Therefore, there would be no impacts to stormwater utility providers.

### **Alternatives 1a – 1d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 1a through 1d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.1.2.1. The type and extent of impacts to utilities would depend on the sub-alternative chosen:

- Alternative 1a would involve reusing the existing historic structures and utilities could be improved or remain as is; therefore, adverse impacts to utilities would be negligible.
- Alternative 1b would involve the relocation of the historic structures. Under this sub-alternative, existing utilities currently servicing the structures would be shutoff or disconnected; new connection lines would be required at the new location of the structures. Temporary, negligible to minor adverse impacts could occur from disruption of services to users during construction.
- Alternative 1c would involve the demolition of the structures, which would require the shutoff/disconnection of utility lines. Negligible adverse impacts to utilities are expected under this sub-alternative.
- Alternative 1d would involve a combination of Alternatives 1a through 1c and the type of utility impact would be similar to those previously discussed under each sub-alternative; the extent would occur within the range of impacts that would result from Alternatives 1a, 1b, or 1c.

Since the Main Building and Garage are listed under NRHP, any renovation and demolition work to these structures would follow *GSA Procedures for Historic Properties*. Any changes to the buildings would also follow the Secretary of the Interior's *Standards for the Treatment of Historic Properties* and applicable guidelines.

### **3.10.2.4 Alternative 2 – Concurrent Construction (Westward Expansion)**

Under Alternative 2, construction of the proposed Commercial LPOE would result in short-term, moderate, adverse impacts to facilities; and short-term, negligible adverse impacts to utilities. At the RHC LPOE, there would be short-term, minor adverse impacts on facilities; and short-term, negligible to minor adverse impacts to utilities.

Operations would result in long-term, moderate, beneficial impacts to facilities; and long-term negligible to minor adverse impacts to utilities from increased demand at the proposed Commercial LPOE. There would be long-term, moderate, beneficial impacts to facilities, and long-term, negligible adverse impacts to utilities at the RHC LPOE.

### **Construction**

Impacts during construction of Alternative 2 would be similar to as described for Alternative 1 for both the Commercial LPOE and RHC LPOE, including the Alternative 1 Expansion Area. Impacts would be slightly greater under Alternative 2 as there would be a greater use of utilities at any given time than under Alternative 1 due to the construction periods for both locations occurring concurrently; however, such increases are not anticipated to adversely impact utility provider's ability to meet demand and would be

negligible. Construction of new utilities at the Commercial LPOE and coordination to avoid impacts to existing utilities at the existing RHC LPOE would be similar to as described for Alternative 1. Additional coordination with utilities would be required during construction in the Alternative 2 Expansion Area, particularly for natural gas utilities that run through the site.

Impacts to facilities would be similar to as described for Alternative 1, but less adverse as the overall construction period would be shorter, which would have greater beneficial impacts due to fewer delays or re-routing due to construction. Overall impacts would be short-term, minor, and adverse.

### **Operations**

Impacts during operations of the Commercial LPOE and RHC LPOE under Alternative 2 would be similar to as described for Alternative 1. At the RHC LPOE, increased stormwater management capacity may be needed depending on the extent of development (i.e., more impervious area would result in higher stormwater runoff requiring management); therefore, stormwater structures and BMPs, such as drainage pipes, outfalls, and detention ponds, may be used to manage any increases in runoff and minimize the risk of flooding. Overall impacts to utilities at the RHC LPOE would be long-term, negligible to minor, and adverse.

### **Alternatives 2a – 2d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 2a through 2d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.2.1. Under Alternatives 2a through 2d, impacts to utilities would be similar to those described under Alternatives 1a through 1d.

#### **3.10.2.5 Alternative 3 – Concurrent Construction (Eastward Expansion)**

Under Alternative 3, construction of the proposed Commercial LPOE would result in short-term, moderate, adverse impacts to facilities; and short-term, negligible adverse impacts to utilities. At the RHC LPOE, there would be short-term, minor adverse impacts on facilities; and short-term, negligible to minor adverse impacts to utilities.

Operations would result in long-term, moderate, beneficial impacts to facilities; and long-term negligible to minor adverse impacts to utilities from increased demand at the proposed Commercial LPOE. There would be long-term, moderate, beneficial impacts to facilities, and long-term, negligible adverse impacts to utilities at the RHC LPOE.

### **Construction**

Impacts during construction of Alternative 3 would be similar to as described for Alternative 2 for both the Commercial LPOE and RHC LPOE, including the Alternative 1 Expansion Area. Additional coordination with utilities would be required during demolition and construction due to existing water, sewer, electric, and natural gas service to structures within the Alternative 3 Expansion Area.

Impacts to facilities would be similar to as described for Alternative 2. Overall impacts would be short-term, minor, and adverse.

### **Operations**

Impacts during operations of the Commercial LPOE and RHC LPOE under Alternative 3 would be similar to as described for Alternative 1. Increased stormwater management capacity may be needed at the Alternative 3 Expansion Area depending on the extent of re-development (i.e., more impervious area would result in higher stormwater runoff requiring management); therefore, stormwater structures and BMPs, such as drainage pipes, outfalls, and detention ponds, may be used to manage any increases in runoff and minimize the risk of flooding. Overall impacts to utilities at the RHC LPOE would be long-term, negligible to minor, and adverse.

### **Alternatives 3a – 3d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 3a through 3d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.2.1. Under Alternatives 3a through 3d, impacts to utilities would be similar to those described under Alternatives 1a through 1d.

#### **3.10.2.6 Impact Reduction Measures**

Impacts on infrastructure and utilities would be reduced through the following:

- Adherence to GSA P100 Standards (GSA 2021) including:
  - New parking and road networks must use low-embodied carbon concrete and environmentally preferable asphalt.
- Buildings would be “net zero” ready on a source energy basis with onsite renewables that are designated on the plan for future installation including pathways, conduits, or other means of providing power to the building.
- Coordinating with utility providers in advance of such activities to determine the best course of action to avoid or minimize impacts, either by implementing measures to protect utility lines or by arranging for their temporary or permanent relocation.

Future development may incorporate onsite renewable energy generation and would utilize energy- and water-efficient technology, which would further reduce demands on utility providers. GSA would also seek a minimum of a LEED Gold certification for construction of a new facility onsite, and steps to achieve this would likely include a reduction in the demand for energy and water.

## **3.11 SOCIOECONOMICS**

This section describes the baseline conditions for the social and economic environment in the project area that are sensitive to changes and potential socioeconomic impacts that could result from implementing the Proposed Action, including the alternatives as discussed in Chapter 2. The data supporting this analysis were collected from standard sources, including federal agencies such as the U.S. Census Bureau, Bureau of Labor Statistics, and Bureau of Economic Analysis; state agencies such as the Office of Employment and Population Statistics and Arizona Commerce Authority; and local agencies such as The Maricopa Association of Governments.

While social impacts are discussed in this section, a discussion of those impacts that could disproportionately affect minority, low income, and youth populations are discussed in Section 3.12, Environmental Justice and Protection of Children’s Health and Safety.

### **3.11.1 Affected Environment**

#### **3.11.1.1 *Region of Influence***

Since potential impacts with the greatest intensity would likely occur in Cochise County, the county is defined as the ROI, or the area analyzed for socioeconomic impacts. Socioeconomic impacts would be felt most by individuals, residents, and workers in Cochise County; especially residents in Douglas, Arizona and areas adjacent to the proposed Commercial LPOE site. Data are presented for Cochise County and compared to the State of Arizona overall and described for the City of Douglas as appropriate. The most recent and best available data are presented throughout the section.

#### **3.11.1.2 *Existing Conditions***

Due to the close interconnectedness of population, housing, and labor conditions between the Commercial LPOE and RHC LPOE, this section discusses the general affected environment of the proposed Commercial LPOE and RHC LPOE together for each socioeconomic component. Where there are differences between the sites requiring distinction between the two locations, these are highlighted in the text as appropriate.

### **Population and Housing**

#### ***Population***

Past and current population data and future population estimates for the City of Douglas, Cochise County, and Arizona are shown in Table 3.11-1.

Douglas is the second-largest city in Cochise County. The populations of the City of Douglas, Cochise County, and Arizona all increased from 2000 to 2020. The City of Douglas, Cochise County, and Arizona increased at a similar average annual growth rate, with Douglas increasing at about 1 percent per year, Cochise County increasing at about 0.5 percent per year, and Arizona increasing at about 2 percent per year. However, since 2010 the populations in both the City of Douglas and Cochise County have declined at an average annual rate of 0.5 percent, while Arizona’s population increased at an average annual rate of approximately 4 percent. From 2030 to 2050, the populations in the City of Douglas and Cochise County are expected to further decline, while the state population is expected to grow at an average rate of 1 percent per year (ACA 2018).



**Table 3.11-1. Population Growth for the City of Douglas, Cochise County, and Arizona**

Metric	City of Douglas	Cochise County	Arizona
<b>Historical and Current Population</b>			
2000	14,312	117,755	5,130,632
2010	17,378	131,346	6,392,017
2020	16,534	125,447	7,151,502
Average Annual Growth Rate (2010-2020)	-0.50%	-0.50%	3.90%
Average Annual Growth Rate (2000-2020)	0.80%	0.30%	2.00%
<b>Projected Population<sup>a</sup></b>			
2030	15,899	130,906	8,284,861
2040	15,448	130,456	9,247,212
2050	15,078	130,177	10,096,228
Average Annual Growth Rate (2030-2050)	-0.30%	-0.60%	1.10%

Source: USCB 2000; USCB 2010; USCB 2020a; ACA 2018

<sup>a</sup> Population projections are based on the 2010 Census and are not consistent with 2020 Census results. Updated population projections will be released at the end of 2022 and will be based on the 2020 Census.

### Housing

A housing unit refers to a house, an apartment, a mobile home or trailer, a group of rooms, or a single room occupied as separate living quarters, or if vacant, intended for occupancy as separate living quarters. Both occupied and vacant housing units are included in the total housing unit inventory. A housing unit is classified as occupied if it is the usual place of residence of a person or group of people; conversely, a housing unit is classified as vacant if it is not the usual place of residence of a person or group of people. The rental vacancy rate is the proportion of the rental inventory which is vacant for rent (USCB 2020b).

The total housing units, occupied housing units, rental vacancy rates, and homeowner vacancy rates for the City of Douglas, Cochise County, and Arizona are shown in Table 3.11-2.

**Table 3.11-2. Housing Characteristics for the City of Douglas, Cochise County, and Arizona**

Location	Total Housing Units	Occupied Housing Units	Rental Vacancy Rate (%) <sup>a</sup>	Homeowner Vacancy Rate (%)
City of Douglas	5,354	4,512	3.4	3.4
Cochise County	61,380	50,917	6.8	3.6
Arizona	3,040,595	2,643,430	5.4	1.6

Source: USCB 2020c

<sup>a</sup> The rental vacancy rate is computed by dividing the number of vacant units for rent by the sum of the number of renter-occupied units, the number of vacant units for rent, the number of rented not yet occupied units, and then multiplying by 100 (USCB 2020b).

### Labor

Direct, indirect, and induced jobs could be created if Alternative 1 or 2 is selected. Therefore, labor force and employment statistics are presented for Cochise County. The City of Douglas is omitted from comparison of labor statistics with Cochise County and Arizona, as Bureau of Labor Statistics does not provide data for cities. As with the rest of the U.S., the COVID-19 pandemic shifted economic dynamics in Cochise County, and labor data from 2020 reflects the slowing of economic growth.

### **Labor Force**

The size of a county’s civilian labor force is measured as the sum of those currently employed and unemployed. People are classified as unemployed if they do not have a job, have actively looked for work in the prior four weeks, and are currently available for work (BLS 2022). As shown in Table 3.11-3, from 2000 to 2020 Cochise County’s labor force remained stable, and the state’s labor force grew at an average of approximately 2 percent per year. However, there has been a substantial decrease between 2010 and 2020, declining at an average annual rate of about 1 percent.

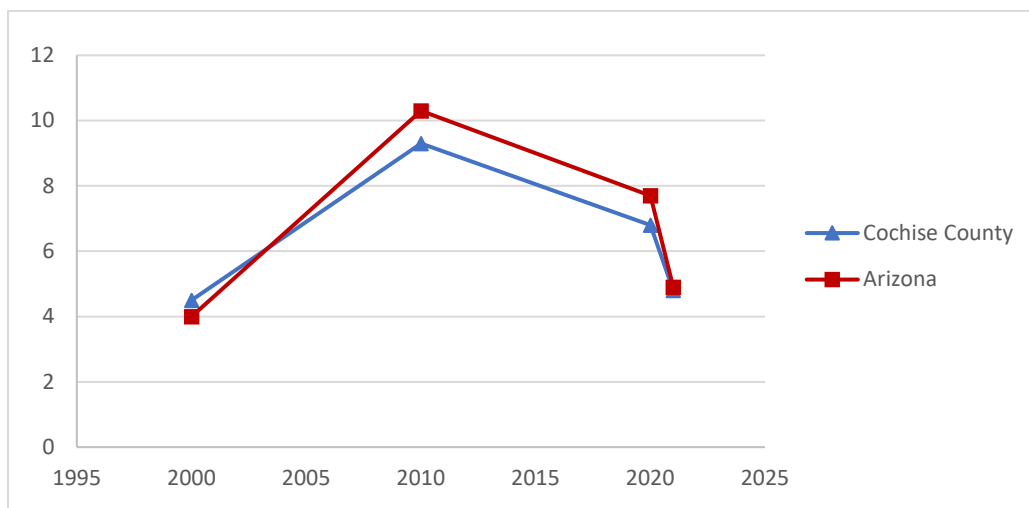
**Table 3.11-3. Civilian Labor Force for Cochise County and Arizona, 2000–2020**

Location	2000	2010	2020	Average Annual Growth Rate (2010-2020)	Average Annual Growth Rate (2000-2020)
Cochise County	48,657	57,146	50,090	-1.2%	0.1%
Arizona	2,510,611	3,096,316	3,456,852	1.0%	1.9%

Source: BLS 2000; BLS 2010; BLS 2020a, BLS 2021

### **Unemployment**

The unemployment rate is calculated based on the number of unemployed persons divided by the labor force. Figure 3.11-1 shows the annual unemployment rates for Cochise County and Arizona in 2000, 2010, and 2020. In 2000, the unemployment rate in Cochise County was 0.5 percent lower than in the state of Arizona. From 2000 to 2010, unemployment in Cochise County and Arizona increased to 9.3 and 10.3 percent, respectively. The sharp increase between 2000 and 2010 can be attributed to the 2008 economic crisis, which was part of the global financial downturn. Unemployment rates have decreased since 2010, and in 2020 unemployment rates were 6.8 and 7.7 percent in Cochise County and Arizona, respectively. In 2021, the annual unemployment rates for Cochise County and Arizona were 4.8 and 4.9 percent, respectively.



Source: BLS 2000; BLS 2010; BLS 2020a, BLS 2021

**Figure 3.11-1. Unemployment Rates in Cochise County and Arizona, 2000–2020**

### **Employment by Industry**

Employment statistics by industry in Cochise County are shown in Table 3.11-4. The leading industries in the county are trade, transportation, and utilities; federal government; local government; and education and health services. These four industries account for more than half of total employment in Cochise County (BLS 2020b).

**Table 3.11-4. Employment by Industry in Cochise County, 2022**

Industry	Establishments	Employment
Trade, Transportation, and Utilities	428	5,973
Local Government	147	4,941
Federal Government	63	4,437
Education and Health Services	343	4,230
Professional Business Services	390	3,845
Leisure and Hospitality	278	3,639
Construction	217	1,938
State Government	13	930
Financial Activities	191	899
Natural Resources and Mining	79	822
Manufacturing	57	668
Other Services	142	542
Information	36	330
Unclassified	20	10
<b>Total</b>	<b>2,404</b>	<b>33,204</b>

Source: BLS 2022

Table 3.11-5 shows the top ten employers in Cochise County. Joyson Safety Systems Acquisition LLC, located approximately 1 mile north of the RHC LPOE, is the third-largest employer in Cochise County. Advanced Call Center Technologies, located approximately 1.6 miles northeast of RHC LPOE, is the tenth-largest employer in Cochise County. Notably, the U.S. Customs and Border Protection employs 1,070 people in Cochise County, with approximately 200 staff supporting operations at the RHC LPOE (Arizona MAG 2020a and 2020b).

**Table 3.11-5. Top Ten Employers in Cochise County, 2020**

Rank	Company	Activity	Employment
1	U.S. Department of the Army	Government	11,713
2	U.S. Customs and Border Protection	Government	1,070
3	Joyson Safety Systems Acquisition LLC	Manufacturing	1,000
4	Cochise County	Government	880
5	Walmart	Retail	824
6	State of Arizona	Government	800
7	Aegis Communications Group LLC	Business Services	724
8	Rchpsierra Vista Inc	Health Care	650
9	Sierra Vista Public Schools Unified District 68	Education	580
10	Advanced Call Center Technologies	Business Services	500
<b>Total</b>			<b>18,741</b>

Source: Arizona MAG 2020a and 2020b

## **Earnings**

Several measures are used to describe earnings in the ROI, including per capita personal income (PCPI) and compensation by industry. The City of Douglas is omitted from comparison of earnings statistics with Cochise County and Arizona, as Bureau of Labor Statistics does not provide data for cities.

### ***Per Capita Personal Income***

Personal income is the income received by all persons from all sources, or the sum of net earnings by a place of residence, property income, and personal current transfer receipts. This includes earnings from work received during the period, interest and dividends received, and government transfer payments, such as social security checks. It is measured before the deduction of personal income taxes and other personal taxes and is reported in current dollars. PCPI is the personal income for county residents divided by the county's total population (BEA 2022).

Table 3.11-6 contains annual PCPI in 2000, 2010, and 2020 for Cochise County and Arizona. All dollar estimates are in current dollars (not adjusted for inflation). Arizona's PCPI was about 27 percent higher than Cochise County's in 2000 and about 8 percent higher in 2020. In 2010, Cochise County's PCPI surpassed the state's PCPI by about 2 percent. Notably, Cochise County's PCPI more than doubled from 2000 to 2020, growing about 33 percent faster than the state overall.

**Table 3.11-6. Annual Per Capita Personal Income in Cochise County and Arizona (in dollars)**

	Per Capita Personal Income			
	2000	2010	2020	Percent Change 2000–2020
Cochise County	20,713	34,580	45,786	121.0
Arizona	26,388	33,848	49,648	88.1

Source: BEA 2020a

### ***Industry Compensation***

Compensation data are measured and reported for the county of work location and are typically reported on a per job basis. Compensation data indicate the wages and salaries for work done in a particular place (e.g., a county), but if the worker does not live in the county where the work occurred (e.g., a person from a neighboring county may cross county lines to go to work), then a sizeable portion will be spent elsewhere. These expenditures will not remain in or flow back to that county's economy. Total industry compensation includes wages and salaries as well as employer contribution for employee retirement funds, social security, health insurance, and life insurance. The term "Total Industry Compensation" is often used in economic data, but it is somewhat of a misnomer in that a portion of the "industry earnings" stems from government-related activity. Nevertheless, total industry compensation provides a good picture of the relative sizes of market-related economic activity, or business activity, performed in Cochise County (BLS 2017).

As shown in Table 3.11-7, income is generated by economic activity in Cochise County through a variety of sectors, including various types of business as well as government. Government and government enterprises; health care and social assistance; professional, scientific, and technical services; and construction accounted for approximately 91 percent of the approximately \$2.9 billion compensated to employees working in Cochise County in 2020. It should be noted that while government and government enterprises often account for a large proportion of the compensation of employees in a county, 49.4 percent of total compensation in Cochise County is considered a high proportion and can be attributed to the Fort Huachuca Army base, home to the Army Network Enterprise Technology Command and the Army Intelligence Center, as well as the U.S. Customs and Border Protection presence along the U.S.–Mexico border, including three U.S. Border Patrol stations (Health Management Associates 2017, Cochise County 2022).

**Table 3.11-7. Compensation of Employees by Industry in Cochise County, 2020**

Industry Description	Compensation (\$000)	Percent <sup>a</sup>
Government and Government Enterprises	1,442,594	49.4
Health Care and Social Assistance	254,323	8.7
Professional, Scientific, and Technical Services	241,138	8.3
Construction	235,130	8.1
Retail Trade	170,308	5.8
Administrative and Support and Waste Management and Remediation Services	101,157	3.5
Transportation and Warehousing	77,767	2.7
Accommodation and Food Services	75,937	2.6
Other Services Except Government and Government Enterprises	48,518	1.7
Finance & Insurance	39,396	1.3
Manufacturing	38,267	1.3
Educational Services	33,127	1.1
Wholesale Trade	30,640	1.0
Utilities	28,779	1.0
Farm (Crops, livestock, and dairy)	26,027	0.9
Information	24,545	0.8
Real Estate and Rental and Leasing	14,645	0.5
Management of Companies and Enterprises	13,346	0.5
Mining, quarrying, and oil and gas extraction	9,532	0.3
Arts, Entertainment, and Recreation	7,967	0.3
Forestry, Fishing, Related Activities (Support activities for agriculture and forestry)	7,278	0.2
<b>Total compensation of employees</b>	<b>2,920,421</b>	

Source: BEA 2020b

<sup>a</sup> Numbers may not add up to exactly 100 percent due to rounding.

### **Local Economy of the City of Douglas and Surrounding Communities**

The local economy of Douglas employs approximately 4,370 workers, compared to 460 employees employed in nearby Pirtleville. Households in Douglas had a median household income of \$38,446 in 2020, while the median household income in Pirtleville was slightly higher at \$40,227. These are both lower than the household median income in Cochise County (\$51,505), Arizona (\$61,529), and across the entire U.S. (\$64,994). The largest industries and highest paying industries overlap in the two communities as follows (Datausa 2020):

### **Top Industries**

- **Douglas** – Public Administration (933 workers), Health Care & Social Assistance (618 workers), and Educational Services (575 workers)
- **Pirtleville** – Public Administration (113 workers), Administrative & Support & Waste Management Services (110 workers), and Construction (69 workers)

### **Highest Paying Industries**

- **Douglas** – Transportation & Warehousing, & Utilities (\$60,750), Wholesale Trade (\$53,750), and Real Estate & Rental & Leasing (\$50,284)
- **Pirtleville** – Public Administration (\$41,477) and Construction (\$23,542)

The top employers in Douglas are Joyson Safety Systems Acquisition LLC (1,000 workers), the U.S. Government (609 workers), and Advanced Call Center Technologies (500 workers) (Arizona MAG 2020b).

The City of Douglas shares a border with the City of Agua Prieta, Sonora and is the second-largest port in Arizona for imports to and from Mexico. The connection of SR-80 and US-191, which feeds into I-10 about 63 miles north of Douglas, increases the demand of business development and the commercial shipping industry, directly connecting Mexican states with major U.S. markets (City of Douglas 2022). In Douglas and Agua Prieta, there are numerous maquiladoras (twin factories with facilities on both sides of the international border), with Douglas serving as the warehouse distribution center (Cochise College 2018). The international trade, particularly produce imports, that occurs at the RHC LPOE in Douglas is largely responsible for the economic vitality of the region (SEAGO 2018).

Tourism also provides a significant economic boost to the area, which offers a range of recreational, historical, and cultural attractions, as well as a popular retail destination. As shown in Table 3.11-7, retail trade account for approximately 6 percent of total industry compensation in Cochise County. The city's retail market serves approximately 100,000 people in Douglas, Pirtleville, Agua Prieta, and surrounding communities on the U.S. side of the border (Cochise College 2018). Many border tourists enter the U.S. with the sole purpose of shopping, contributing to the area's trade and sales tax revenue (Cochise County 2022).

The SouthEastern Arizona Governments Organization has identified Douglas and the area surrounding the proposed Commercial LPOE as an Opportunity Zone—a designated area deemed as a prime location for economic and community development projects. In addition to general socioeconomic goals, the SouthEastern Arizona Governments Organization's economic development goals specific to the Douglas area focus on border-related opportunities, including border-targeted business attraction and industry development, advocacy for adequate LPOE staffing, and marketing of Foreign Trade Zones, and assisting in potential expansion resulting from the Proposed Action (City of Douglas et al. 2021).

### **Quality of Life and Community Services**

Quality of life can be characterized as a person's well-being and happiness. Quality of life is a subjective measure and cannot be solidly defined. For this analysis, quality of life considerations focus on those elements that the public generally associates with a high quality of life: education, safety, recreation opportunities, and a positive and affordable general living environment. Other factors, such as air quality, traffic, and noise could also contribute to a person's sense of quality of life and are addressed in Sections 3.3, Air Quality and Greenhouse Gas Emissions; 3.8, Transportation and Traffic; and 3.9, Noise.

### **Police, Fire and Medical Services**

The City of Douglas Police Department is located at 300 14<sup>th</sup> Street. The department employs 34 sworn and 14 civilian-staff and consists of the Humane Division and the Patrol Division. The Communications Division is part of the department’s support services, and handles all emergency and non-emergency calls for service for police and emergency calls for Fire and Emergency Medical Services (City of Douglas 2022).

The Douglas Fire Department is located at 1400 10<sup>th</sup> Street. There is one fire station in the city with three fire trucks. The department serves an 8 square mile area for fire suppression response and responds to Emergency Medical Services calls in a 1,500 square mile radius (City of Douglas 2018b). The department also assists Northern Sonora with Emergency Medical Services, Fire, and HazMat incidents. The Douglas Fire Department was formed as a volunteer fire department and is comprised of 27 full-time employees and 4 part-time employees.

The Copper Queen Community Hospital is located in Bisbee and handles the major emergency cases for the region. The Copper Queen Community Hospital–Douglas Medical Complex is a Freestanding Emergency Department. The Freestanding Emergency Department is located at 100 East Fifth Street and provides closer emergency services to residents of Douglas and the surrounding communities (Copper Queen Community Hospital 2022a).

### **Schools**

Students in the City of Douglas attend schools in the Douglas Unified School District #72, at the Pre-Kindergarten Early Learning Center, or at respective charter schools, Center for Academic Success charter schools or Omega Alpha Academy. There are three schools within 1 mile of the RHC LPOE, including Center for Academic Success Elementary School, Center for Academic Success High School, and Sarah Marley Elementary School.

The average student-to-teacher ratio in Arizona is approximately 23 students to 1 teacher. This student-to-teacher ratio is among the highest in the country; the national average is 16 students to 1 teacher. All the schools in the City of Douglas have a student-to-teacher ratio that is lower than the state of Arizona (NCES 2021). Total enrollment and student-to-teacher ratio for the 11 schools in the City of Douglas are presented in Table 3.11-8.

**Table 3.11-8. Schools in the City of Douglas, 2020-2021**

<b>School</b>	<b>Enrollment</b>	<b>Student-to-Teacher Ratio</b>
Sarah Marley Elementary School	236	17:1
Ray Borane Middle School	414	19:1
Joe Carlson Elementary School	381	19:1
Paul Huber Middle School	443	19:1
Douglas High School	1,448	20:1
Stevenson Elementary School	374	21:1
Faras Elementary School	148	21:1
Clawson Elementary School	302	22:1
Center for Academic Success (K-12)	526	N/A <sup>a</sup>
Early Learning Center	91	N/A <sup>a</sup>
Omega Alpha Academy (K-12)	278	N/A <sup>a</sup>

Source: NCES 2021

K-12 = Kindergarten through 12<sup>th</sup> grade

<sup>a</sup> Student and teacher data is not available for this school.

Within 50 miles of the City of Douglas, there are an additional 36 public schools for varying K-12 education levels in the nearby communities of McNeal, Bisbee, Naco, Elfrida, Hereford, Tombstone, Pearce, Sierra Vista, and Fort Huachuca, as well as four private schools in Bisbee and Sierra Vista. Total school enrollment for public and private schools as of 2021 within 50 miles is 15,721. Student-to-teacher ratios vary among these schools but are below the state average of 23:1 for all but four schools.

The two-year public institution, Cochise College, has a campus in Douglas with a population of 10,800 students. The campus is located approximately 3.7 miles northwest of the proposed Commercial LPOE site.

### ***Property Values***

The value of a property is often influenced by the positive or negative value of surrounding properties, typically resulting in clusters of hot spots within a community. Smart Growth America conducted a “fiscal hot spot analysis”, looking at property values within a set boundary and identifying areas where there are statistically significant clusters of higher or lower valued land. The City of Douglas has five main “hot spots” of property values, four of which are in primarily residential areas and include the existing warehouses east of the RHC LPOE. A large portion of downtown including North G Avenue and East 10<sup>th</sup> Street represents the largest “hot spot” in Douglas. The City of Douglas plans to expand economic development in the downtown area to include a mixed-use commercial district (City of Douglas et al. 2021).

The recreational value of natural resources can link residents to an area or attract new residents to an area. The recreational area closest to the RHC LPOE is the 1.6-acre 3<sup>rd</sup> Street Park, located 0.2 miles away. The 24-acre 8<sup>th</sup> Street Park, which is located 2.3 miles from the RHC LPOE, features playing fields; picnic areas; a pool; and workout stations for local residents and visitors. These areas (discussed in Section 3.4, Land Use and Visual Resources) contribute to the region’s identity, as well as area quality of life (Cochise County 2022). There are plans to develop multi-use areas and public green spaces in the City of Douglas (City of Douglas et al. 2021).

## **3.11.2 Environmental Consequences**

### **3.11.2.1 Methodology**

The effects analysis considers aspects of the social and economic environment that are sensitive to changes and that may be adversely or beneficially affected by activities associated with Alternatives 1, 2, or 3. As noted earlier, the ROI for the socioeconomic analysis is defined as Cochise County, but social impacts to population, housing, and quality of life and community services focus on the City of Douglas—or the area most likely to be affected by Alternatives 1, 2, or 3.

To evaluate the impacts on socioeconomic resources, GSA reviewed the project alternatives to determine whether any activities have the potential to cause the following within the ROI:

- Alter local economies;
- Change housing characteristics (types of units, occupancy, housing values, etc.) or residential development patterns;
- Alter population growth or demographic patterns;
- Displace populations, residents, or businesses to accommodate construction;
- Require an amount of public or private resources (time and/or money) that interferes with the performance of other local government functions or the viability of proposed projects; or
- Induce growth without adequate supporting community services (e.g., education, public health and safety).

A significant adverse impact to socioeconomics would occur if the Proposed Action would result in:



- Alters local economies on a substantial basis without the capacity to absorb a decrease or increase;
- Changes housing characteristics or residential development patterns in a substantial way;
- Places a demand on suitable housing that exceeds availability;
- Alters population growth or demographic patterns in ways that change the overall character of communities;
- Requires an amount of public or private resources (time and/or money) that substantially interferes with the performance of other local government functions or the viability of proposed projects; and
- Induces growth that exceeds the capacity of supporting community services, including:
  - Change in the number of users of community services that exceed existing capacity;
  - Change in the demand for emergency and public protection services that would increase response times based on existing personnel resources and equipment; or
  - Change in the funding needed to sustain services or to increase access to services.

### **3.11.2.2 No Action Alternative**

Under the No Action Alternative, GSA would not construct a new Commercial LPOE or expand and modernize the RHC LPOE. Socioeconomic benefits of approximately 200 government jobs remaining within the City of Douglas community and the associated income, spending, and tax revenue would continue. However, the potential short-term and long-term social and economic benefits from direct, indirect, and induced jobs from the Proposed Action would not occur in the City of Douglas or Cochise County. The capacity and efficiency of the RHC LPOE would degrade over time which could result in long-term adverse minor to moderate economic impacts to businesses and the regional economy. Long-term, minor adverse impacts in the City of Douglas would continue as COVs remain routed through the city, which would hinder revitalization plans and economic growth for the city. Congestion and traffic would continue to increase in the area, potentially delaying access to schools, recreation areas, hospitals, and other community facilities.

### **3.11.2.3 Alternative 1 – Sequential Construction**

During construction from Alternative 1 there would be:

- Short-term, negligible impacts on population and housing;
- Short-term, minor, beneficial, and direct impacts on unemployment and income;
- Short-term, moderate to significant, beneficial, and indirect impacts from materials and equipment purchases, as well as indirect and induced job creation;
- Temporary to long-term, minor to moderate adverse impacts on local businesses adjacent to RHC LPOE; and
- Temporary, minor adverse impacts to nearby neighborhoods from decreased quality of life.

During operations from Alternative 1 there would be:

- Long-term, negligible to minor, beneficial, and direct impacts to population and housing;
- Long-term, moderate to significant, beneficial, and direct impacts to labor and earnings;
- Long-term minor to moderate, beneficial, direct and indirect impact on unemployment in all industries in Cochise County;

- Long-term, moderate to significant, beneficial, and direct impacts from commercial and industrial business growth around the Commercial LPOE; and
- Long-term, minor to moderate, beneficial impacts to quality of life in the City of Douglas, although long-term, minor adverse impacts from increasing population and contributing to unfavorable student-to-teacher ratios.

### **Construction (Commercial and RHC LPOEs)**

Overall impacts on population and housing would be negligible during construction. The population is not expected to grow during the construction phase or increase demand on local housing because construction workers are not expected to relocate to the area. GSA anticipates that the majority of construction workers would be local and commute daily to the Commercial LPOE and RHC LPOE sites from their current residences within Cochise County. The remaining non-local workers would likely be hired from the Tucson or Phoenix area and commute as needed to Douglas. The majority of non-local workers are not expected to relocate semi-permanently or permanently to Douglas (i.e., rent an apartment in or near the City of Douglas). Instead, non-local workers from the Tucson or Phoenix area would primarily utilize hotels in or near Douglas. If workers temporarily relocate, the overall number would be expected to be low given the overall number of construction workers (i.e., 50 workers during non-peak construction, and 100 workers during peak construction). As such, the demand for local housing would not be expected to increase during the construction phase. The ability of individuals in Cochise County living on a fixed income to pay rent; Cochise County's tax base; and Cochise County's ability to provide funding for social services, health services, or schools would not be affected.

There would be a short-term, minor, beneficial, and direct impact on unemployment and income in the City of Douglas and communities associated with construction of the commercial LPOE and RHC LPOE. Construction of the proposed Commercial LPOE would create up to 100 jobs during an estimated 48 to 54-month construction period. Up to 100 workers would be employed during a peak construction period of 18 to 24 months. During an estimated non-peak construction period of 30 to 36 months, up to 50 workers would be employed. Following the completion of the Commercial LPOE, the subsequent expansion and modernization of the RHC LPOE would create up to 100 jobs during an estimated 36 to 42-month period. Similar to the construction of the Commercial LPOE, 18 to 24 of those months represent peak construction and maximum number of workers, and up to 50 workers would be working during an estimated non-peak construction period of 18 to 24 months. Because workers would be hired locally or from Cochise County, most of their expenditures (e.g., rent, property taxes) for the 84 to 96-month duration of their employment would remain in or flow back into Cochise County's economy. In general, approximately 80 percent is actually "take home" pay, and the other 20 percent goes toward workers' compensation, health insurance, unemployment, and Social Security. Thus, approximately 80 percent of the wages and salaries of local construction workers would be spent in Cochise County and flow back into Cochise County's economy.

The PCPI and compensation of employees in the construction sector in Cochise County would be expected to increase slightly during the 84 to 96-month construction period. During this time, the unemployment rate in Cochise County would likely decrease slightly. Short-term, moderate to significant, beneficial, and indirect socioeconomic impacts would result from directly impacted industries purchasing supplies and materials from other industries. The estimated project cost of Alternative 1 is \$349.2 million, a substantial portion which would be spent within the local Douglas economy on construction labor and materials. Materials and equipment would be purchased from local vendors when applicable. Indirect jobs would be created when the construction firm makes purchases from local vendors and retail stores and at establishments where workers would shop. Induced impacts would occur when employees of the directly and indirectly affected industries spend the wages they receive. The types of indirect and induced jobs that would be created during the construction phase would likely be relatively low-wage jobs, such as restaurant workers or convenience store clerks.

The phased modernization of the RHC LPOE would have temporary, minor adverse impacts on local businesses adjacent to the existing LPOE. Upon completion of the Commercial LPOE, all commercial operations, including the impound lot and the FMCSA Facility, would be transferred to the new facility, then vacated and demolished at the existing RHC LPOE. Relocation of workers supporting these operations could partially remove their spending at local businesses near the RHC LPOE. The adjacent duty-free shop would be acquired by GSA and demolished, along with the city park directly to the north of the RHC LPOE. The duty shop is expected to relocate within the City of Douglas. GSA would negotiate with private landowners as applicable during the land acquisition process to provide fair compensation.

Construction in the Alternative 1 Expansion Area would require permanent closure of Customs Avenue between Pan American Avenue and 1<sup>st</sup> Street to implement the new site plan (see Figure 2-4) for the expanded RHC LPOE. Permanent closure of this segment of Customs Avenue would require rerouting of vehicular access to the businesses on 1st Street via G and H Avenues. This would have a long-term, minor, adverse impact for the businesses on 1<sup>st</sup> Street. The closure of this segment of Customs Avenue would also require the relocation of a bus stop and potentially affect city bus routes and the customers that use the system. The impact of relocating the bus stop would be long-term, minor, and adverse.

Construction would result in temporary, minor adverse impacts associated with decreased quality of life of residents in close proximity to the RHC LPOE due to increased noise levels, air emissions, and traffic and congestion. Residents adjacent the RHC LPOE may be delayed in reaching emergency and urgent care facilities during construction activities. The response time of ambulances, fire trucks, and police may increase slightly when attempting to access areas adjacent to the RHC LPOE. Because no additional students would be expected to relocate to Cochise County during construction, no impacts on the student-to-teacher ratio or quality of education would be expected at Cochise County schools. No impacts to property values are expected during construction.

### **Operations (Commercial and RHC LPOEs)**

Long-term, negligible to minor beneficial impacts to population and housing are expected. Following construction of the Commercial LPOE, CBP would hire approximately 150 additional full-time staff to support approximately 100 positions at the Commercial LPOE and 250 positions at the RHC LPOE.

While it is difficult to estimate the exact level of in-migration, it is assumed that most of the CBP personnel relocating to the area would prefer relocating to the City of Douglas and the surrounding communities. As such, the population may permanently grow (including families) in the long-term. Considering the number of vacant housing units and existing plans for downtown infill development, those who relocate to the area would have ample housing options in the City of Douglas or nearby cities, and this in-migration would help offset local housing vacancies.

Long-term, moderate to significant beneficial impacts to labor and earnings are expected during operations. The project is expected to generate an additional \$10.8 to \$20 million of revenue per year to Cochise County, with the City of Douglas experiencing the most benefits (US Economic Research 2020). The reduced traffic times resulting from the two-port solution would have direct, beneficial effects on personal travel expenditures and freight transportation costs, which would create indirect economic impacts to the region. Shorter wait times at the RHC LPOE for tourists has the potential to increase spending in the area. Reduced freight transportation costs have the potential to influence international trade competitiveness, commercial output, and jobs. As a result, there would be long-term, minor to moderate, beneficial, direct and indirect impacts on unemployment in all industries in Cochise County, especially retail (non-grocery and grocery,); food services establishments; real estate and rental and leasing; health care and social assistance; utilities; finance and insurance; and transportation and warehousing (US Economic Research 2020). Cochise County has designated a substantial portion of undeveloped land surrounding the Commercial LPOE as a “growth area” for resulting development. The area surrounding the Commercial LPOE would be expected to become an industrial and commercial hub, filled with trade and businesses that are more suitable outside of downtown Douglas (City of Douglas et al. 2021).

Alternative 1 could induce potential opportunities for a new warehouse district just east of the RHC LPOE once commercial traffic is moved to the Commercial LPOE (GSA 2021). The city owns several properties, including warehouse buildings, in this area that could more easily be redeveloped once the commercial traffic moves to the new Commercial LPOE. The City of Douglas has plans to revitalize downtown and create connected infrastructure corridors to the Commercial LPOE to ensure that the areas around the RHC LPOE continue to succeed economically while at the same time encouraging commercial and industrial business growth around the Commercial LPOE. It is expected that the area surrounding the Commercial LPOE would revolve around major interstate and international commerce, while the downtown area would focus on investments to attract people ‘to’ downtown as a destination (City of Douglas et al. 2021). As a result, compensation of employees in retail trade; accommodation and food services; construction; real estate and rental and leasing; and arts, entertainment, and recreation would likely increase, and unemployment would likely decrease—creating long-term, moderate to significant, beneficial, indirect impacts. The impacts from permanent closure of Customs Avenue between Pan American Avenue and 1<sup>st</sup> Street would be the same as described above for construction.

Operations of the two-port solution are expected to result in long-term, minor to moderate beneficial impacts to quality of life. Noise levels would return to existing levels in areas near the RHC LPOE once construction activities are completed. Residents close to the RHC LPOE as well as residents in the larger Cochise County area would be expected to benefit from improved traffic circulation and overall air quality in the area. The rerouting of commercial traffic away from downtown Douglas would allow for the development of more pedestrian-friendly infrastructure that would increase safety. Residents living near the Commercial LPOE and along roads such as SR-80 that may experience localized increases in traffic would experience negligible to minor air quality and noise impacts, which could affect quality of life. However, the two-port solution is generally anticipated to result in quality-of-life improvements in the surrounding community which could have beneficial impacts on property values in the City of Douglas and surrounding areas. No adverse impacts to recreational facilities are expected.

Any additional CBP personnel and their families that may relocate to the City of Douglas or surrounding communities would contribute to a permanent population increase and would result in minor adverse impacts on the educational quality. Average household size in Cochise County is 2.41 persons per household (USCB 2021a); in a worst-case scenario where 150 new employees are hired and relocate to the Douglas area, this could represent on average up to 1.41 children assuming all household members are child age, or approximately 210 children. It is expected that new hires would settle not just in the City of Douglas but also the surrounding communities, including areas such as Bisbee or Sierra Vista, depending on preference and accessibility to services. Enrollment in schools within the City of Douglas and surrounding communities as of the 2021-2022 school year was approximately 15,721 (NCES 2023); therefore, in a worst-case scenario where up to 210 children are relocated to the area, this would represent an approximately 1.3 percent increase in students. Based on correspondence with GSA staff, staff may also consider settling in Tucson, and not all staff are expected to relocate with families. Therefore, any increase in child age population near the City of Douglas or surrounding communities is expected to be much lower.

Student-to-teacher ratio in Douglas and Cochise County are generally lower than the state, although higher than national averages. Therefore, any additional students would contribute to unfavorable student-to-teacher ratios at schools. Adverse impacts on education would be at most minor and adverse in the long term assuming the worst-case child population growth scenario, but are expected to be lower given anticipated relocation patterns. Local schools are expected to be able to accommodate marginal increases in population.

Impacts to other community services (i.e., police, fire, medical response) from an increase in permanent population in the surrounding area are expected to be negligible. Any new hires that relocate would be expected to settle not just in the City of Douglas but also the surrounding communities and may also remain as far away as Tucson. Therefore, existing community services are expected to be able to accommodate marginal increases in population dispersed throughout the region.

### **Alternatives 1a – 1d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 1a through 1d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.1.2.1. As these sub-alternatives would take place within the footprint of the RHC LPOE, the potential impacts to socioeconomics as already identified under Alternative 1 would not change.

#### **3.11.2.4 Alternative 2 – Concurrent Construction (Westward Expansion)**

During construction from Alternative 2 there would be:

- Short-term, negligible impacts on population and housing;
- Short-term, minor, beneficial, and direct impacts on unemployment and income;
- Short-term, moderate to significant, beneficial, and indirect impacts from materials and equipment purchases, as well as indirect and induced job creation;
- Temporary to permanent, minor to moderate adverse impacts on local businesses adjacent to RHC LPOE; and
- Temporary, minor adverse impacts to nearby neighborhoods from decreased quality of life.

During operations from Alternative 2 there would be:

- Long-term, negligible to minor, beneficial, and direct impacts to population and housing;
- Long-term, moderate to significant, beneficial, and direct impacts to labor and earnings;
- Long-term minor to moderate, beneficial, direct and indirect impact on unemployment in all industries in Cochise County;
- Long-term, moderate to significant, beneficial, and direct impacts from commercial and industrial business growth around the Commercial LPOE; and
- Long-term, minor to moderate, beneficial impacts to quality of life in the City of Douglas, although long-term, minor adverse impacts from increasing population and contributing to unfavorable student-to-teacher ratios.

### **Construction (Commercial and RHC LPOEs)**

Impacts during construction of Alternative 2 would be similar to as described for Alternative 1 for both the Commercial LPOE and RHC LPOE. Impacts to population and housing would be similar to as described for Alternative 1, except that up to 200 workers would be hired at once to accommodate concurrent construction for an estimated construction period of 48 to 54 months. As under Alternative 1, 18 to 24 of those months represent peak construction with maximum number of workers. Impacts would be greater in the near term while concurrent construction is ongoing but would occur for a shorter duration than under Alternative 1.

There would be short-term, moderate to significant, beneficial impacts to labor and earnings due to increased spending on construction labor and materials. Project-related spending on construction labor and materials would be similar but likely less than under Alternative 1, due to decreased cost escalation and inflationary pressures as a result of the compressed project timeline. Impacts would be greater in the near term while concurrent construction is ongoing but would occur for a shorter duration than under Alternative 1.

Construction would temporarily decrease quality of life of residents in close proximity to the proposed Commercial LPOE and RHC LPOE due to increased noise levels, air emissions, traffic and congestion, and

resultant decrease response times of police, fire, and medical services, similar as to described for under Alternative 1. As under Alternative 1, no impacts to schools or property values are anticipated.

### **Operations (Commercial and RHC LPOEs)**

Impacts during operations of the Commercial LPOE and RHC LPOE under Alternative would be the same as described for Alternative 1.

### **Alternatives 2a – 2d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 2a through 2d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.2.1. As these sub-alternatives would take place within the footprint of the RHC LPOE, the potential impacts to socioeconomics as already identified under Alternative 2 would not change.

#### **3.11.2.5 Alternative 3 – Concurrent Construction (Eastward Expansion)**

During construction from Alternative 3 there would be:

- Short-term, minor, direct, adverse impacts on population and housing;
- Short-term, minor, beneficial, and direct impacts on unemployment and income;
- Short-term, moderate to significant, beneficial, and indirect impacts from materials and equipment purchases, as well as indirect and induced job creation;
- Temporary to permanent, minor to moderate adverse impacts on local businesses adjacent to RHC LPOE; and
- Temporary, minor adverse impacts to nearby neighborhoods from decreased quality of life.

During operations from Alternative 3 there would be:

- Long-term, negligible to minor, beneficial, and direct impacts to population and housing;
- Long-term, moderate to significant, beneficial, and direct impacts to labor and earnings;
- Long-term minor to moderate, beneficial, direct and indirect impact on unemployment in all industries in Cochise County;
- Long-term, moderate to significant, beneficial, and direct impacts from commercial and industrial business growth around the Commercial LPOE; and
- Long-term, minor to moderate, beneficial impacts to quality of life in the City of Douglas, although long-term, minor adverse impacts from increasing population and contributing to unfavorable student-to-teacher ratios.

### **Construction (Commercial and RHC LPOEs)**

As discussed in Section 3.4.2.5, acquisition of parcels in the Alternative 3 Expansion Area would permanently displace at least one active business and three residential occupants and would eliminate various ongoing storage uses on the properties, which may affect the businesses of other property owners. The impacts would be direct short-term to long-term, minor to moderate, and adverse.

Impacts on businesses located near the RHC LPOE from road closures would be similar as described for Alternative 1. Access to neighboring properties with commercial logistics businesses on the north side of 1<sup>st</sup> Street, including three large warehouse buildings used by medical products and machinery firms, could be further impeded by construction activities and/or traffic congestion at the Alternative 3 Expansion Area. The intensity of any adverse impact would depend on the extent and duration of the access limitation or extent of potential traffic detours and is expected to be minor to moderate. Otherwise, impacts during

construction of Alternative 3 would be similar as described for Alternative 2 for both the Commercial LPOE and RHC LPOE.

### **Operations (Commercial and RHC LPOEs)**

Impacts during operations of the Commercial LPOE and RHC LPOE under Alternative 3 would be similar to as described for Alternative 1.

### **Alternatives 3a – 3d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 3a through 3d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.2.1. As these sub-alternatives would take place within the footprint of the RHC LPOE, the potential impacts to socioeconomics as already identified under Alternative 3 would not change.

#### **3.11.2.6 *Impact Reduction Measures***

No impact reduction measures would apply for Socioeconomics under the Proposed Action.

## 3.12 ENVIRONMENTAL JUSTICE AND PROTECTION OF CHILDREN'S HEALTH AND SAFETY

This section describes the baseline conditions for race, income, and population of children in the project area and potential disproportionate impacts that could result from implementing the Proposed Action, including Alternatives 1, 2, and 3 as discussed in Chapter 2. In evaluating environmental justice under NEPA, agencies must recognize the interconnected cultural, social, occupational, historical, or economic factors that may amplify the natural and physical environmental effects of the proposed agency action (CEQ 1997).

### 3.12.1 Affected Environment

#### 3.12.1.1 *Region of Influence*

The ROI for environmental justice and child populations focuses on the proposed Commercial LPOE, RHC LPOE, expansion areas, and immediate surrounding areas. Potential impacts with the greatest intensity and longest duration (e.g., noise, air quality, transportation, changes in economic activity) would occur near the proposed Commercial LPOE and RHC LPOE. Therefore, environmental justice and children protection considerations are analyzed within a respective 2-mile radius of the proposed Commercial LPOE and RHC LPOE.

#### 3.12.1.2 *Regulatory Setting and Requirements*

EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, directs federal agencies to consider whether impacts on human health or the environment (including social and economic aspects) would be disproportionately high and adverse for minority and low-income populations, and would outweigh impacts on the general population or other comparison group.

EO 13990, *Protecting Public Health and the Environment and Restoring Science to Address the Climate Crisis* directs federal agencies to prioritize both environmental justice and employment. EO 13990 supports the national goal of improving public health and the environment by ensuring access to clean air and water, limiting exposure to dangerous chemicals and pesticides, and holding polluters accountable, including those who disproportionately harm people of color and low-income people.

EO 14030, *Climate-Related Financial Risk*, outlines the government approach to mitigating climate-related financial risks and ensuring financial security for workers, families, and businesses who may be disproportionately affected by climate change. The EO advises federal agencies to assess their government programs, assets, and liabilities, and to identify causes of and address disparate impacts on disadvantaged communities and communities of color.

EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks*, places a high priority on the identification and assessment of environmental health and safety risks that may disproportionately affect children. The EO requires that each agency “shall ensure that its policies, programs, activities, and standards address disproportionate risks to children.” It considers that physiological and social development of children makes them more sensitive than adults to adverse health and safety risks and recognizes that children in minority and low-income populations are more likely to be exposed to and have increased health and safety risks from environmental contamination than the general population.

The analysis also considers information from the USEPA's EJSCREEN model. The EJSCREEN model serves as a screening-level tool to identify areas that may have a higher susceptibility to environmental justice impacts because of their demographic composition and existing exposure to contaminants or proximity to facilities. The model uses environmental indicators to quantify susceptibility to exposure, including data related to proximity to air pollution, water pollution, traffic, as well as potentially contaminated sites associated with historic use of lead paint, leaking underground storage tanks (USTs), or facilities that handle hazardous materials and waste.



### 3.12.1.3 Existing Conditions

#### Environmental Justice

The definitions of minority, low-income, and minority or low-income populations are presented below.

- **Minority** – Individual(s) who are members of the following population groups as designated in the U.S. Census: Black or African American, American Indian and Alaska Native, Asian, Native Hawaiian and Other Pacific Islander, as well as Hispanic or Latino of any race.
- **Low-income** – The U.S. Census Bureau uses a set of income thresholds that vary by family size and composition to determine who is in poverty (i.e., classified as ‘low-income’). If a family's total income is less than the family's threshold, then that family and every individual in it is considered in poverty. The official poverty thresholds do not vary geographically but are updated for inflation using the Consumer Price Index. The official poverty definition uses income before taxes and does not include capital gains or noncash benefits (such as public housing, Medicaid, and food stamps) (USCB 2021b).
- **Minority or low-income population** – Populations where either: (a) the total number of minority or low-income individuals of the affected area exceeds 50 percent of the overall population in the same area, or (b) the total number of minority or low-income individuals within the affected area is meaningfully greater (e.g., 120 percent greater) than the minority or low-income population percentage in an appropriate comparison unit of geographic analysis (CEQ 1997). A minority population also exists if there is more than one minority group present and the minority percentage, as calculated by aggregating all minority persons, meets one of the above-stated thresholds. In identifying minority or low-income populations, agencies may consider as a community either a group of individuals living in geographic proximity to one another, or a geographically dispersed/transient set of individuals (such as migrant workers or Native Americans), where either type of group experiences common conditions of environmental exposure or effect. The selection of the appropriate unit of geographic analysis may be a governing body’s jurisdiction, a neighborhood, census tract, or other similar unit that is to be chosen so as not to artificially dilute or inflate the affected minority population.
- **Meaningfully Greater** – A meaningfully greater minority or low-income population within a geographic unit affected by a federal action is determined by comparing the minority or low-income composition of the geographic unit to the minority or low-income composition of the general population. Similar to selecting the appropriate unit of geographic analysis, a comparison population should be selected so as to not artificially dilute or inflate the affected minority populations. For this analysis, the comparison population is the total population of Cochise County.

The analysis of minority and low-income populations focuses on U.S. Census Bureau data for geographic units (i.e., census tracts and block groups) that represent, as closely as possible, the potentially affected areas. A census tract is a geographic area for which the U.S. Census Bureau provides consistent sample data and is comprised of smaller census block groups. Census tracts generally contain a population between 1,200 and 8,000 people. A census block group is the smallest geographic area for which the U.S. Census Bureau provides consistent sample data, and generally contains a population between 600 and 3,000 individuals (USCB 2022). Census data for minority populations are available at the block group level; however, data for incomes below the poverty level are currently available only for census tracts and larger areas.

USEPA typically considers a project to be in an area of potential environmental justice concern when an EJSCREEN analysis for the impacted area shows 1 or more of the 13 indices at or above the 80<sup>th</sup> percentile in the nation and/or state. Per scoping comments received from USEPA dated August 15, 2022, this analysis considers EJSCREEN information for the block groups that exceed the 80<sup>th</sup> percentile in the nation and/or state.

### Commercial LPOE

Table 3.12-1 summarizes the percentage of minority and low-income populations within 2 miles of the Commercial LPOE site, Cochise County, and the State of Arizona for comparison purposes.

**Table 3.12-1. Minority and Low-Income Population within the Region of Influence**

Population Group	2-Mile ROI		Cochise County		Arizona	
	Pop.	Total (%)	Pop.	Total (%)	Pop.	Total (%)
Nonminority	575	22.5	69,095	54.6	3,883,722	54.1
Black or African American	69	2.7	4,512	3.6	305,973	4.3
Total Hispanic or Latino	1,737	67.8	44,858	35.5	2,260,690	31.5
American Indian or Alaska Native	32	1.2	1,058	0.8	272,294	3.8
Asian	128	5.0	2,371	1.9	233,048	3.2
Other Minority <sup>a</sup>	20	0.8	4,548	3.6	218,337	3.0
<b>Total Minority</b>	<b>1,986</b>	<b>77.5</b>	<b>57,347</b>	<b>45.4</b>	<b>3,290,342</b>	<b>45.9</b>
<b>Total Population</b>	<b>2,561</b>	<b>100</b>	<b>126,442</b>	<b>100</b>	<b>7,174,064</b>	<b>100</b>
<b>Low Income</b>	<b>231</b>	<b>9.0</b>	<b>18,121</b>	<b>14.3</b>	<b>990,528</b>	<b>13.8</b>

USCB 2020d and 2020e

<sup>a</sup> Other Minority = Native Hawaiian or Other Pacific Islander; Some other race; or Two or more races.

The average minority population percentage of Cochise County is approximately 46 percent, and a meaningfully greater minority population percentage relative to the general population of the county would exceed the 50 percent threshold defined by CEQ. Therefore, the lower threshold of 50 percent is used to identify areas with meaningfully greater minority populations within 2 miles of the Commercial LPOE. There is 1 block group within the ROI, and the block group contains individual racial group minority populations or aggregate minority populations that meet the environmental justice criteria. The total minority population residing within the 2-mile ROI is approximately 1,986, or 77.5 percent of the entire population. Therefore, the overall composition of the ROI is predominantly nonminority. Minority populations in the ROI are predominantly Hispanic or Latino, followed by Asian. Figure 3.12-1 displays the block groups identified as meeting the criteria for environmental justice minority populations surrounding the proposed Commercial LPOE, as well as the population density of minority populations within each block group.

Low-income populations were evaluated using the absolute 50 percent and the relative 120 percent or greater criteria for potentially affected block group within the ROI. If a block group's percentage of low-income individuals met the 50 percent criterion or was more than 120 percent of the total low-income population within Cochise County (i.e., 18.3 percent), then the area was identified as having a low-income population. Figure 3.12-2 displays the block groups identified as meeting the criteria for environmental justice low-income populations surrounding the proposed Commercial LPOE, as well as the population density of low-income individuals within each block group. The only block within the 2-mile radius does not have a low-income population that exceeds the 50 percent or meaningfully greater criteria.

Using USEPA's EJSCREEN model, the one block group within 2 miles of the Commercial LPOE site was identified to meet or exceed the 80<sup>th</sup> state or national percentile threshold for Ozone (level in air), Lead Paint (percent of housing units built prior to 1960), and Wastewater Discharge.

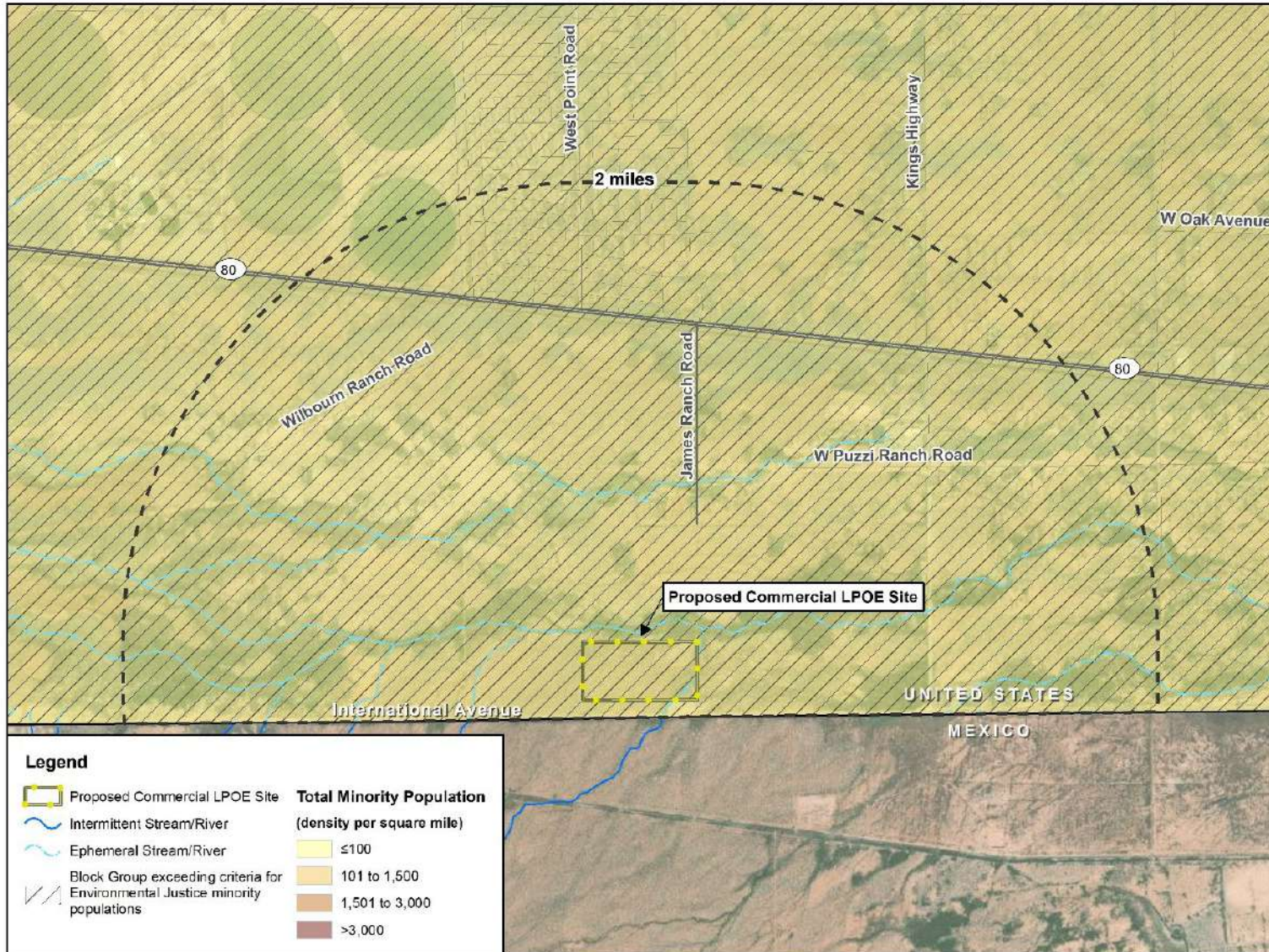


Figure 3.12-1. Minority Populations at Commercial Site

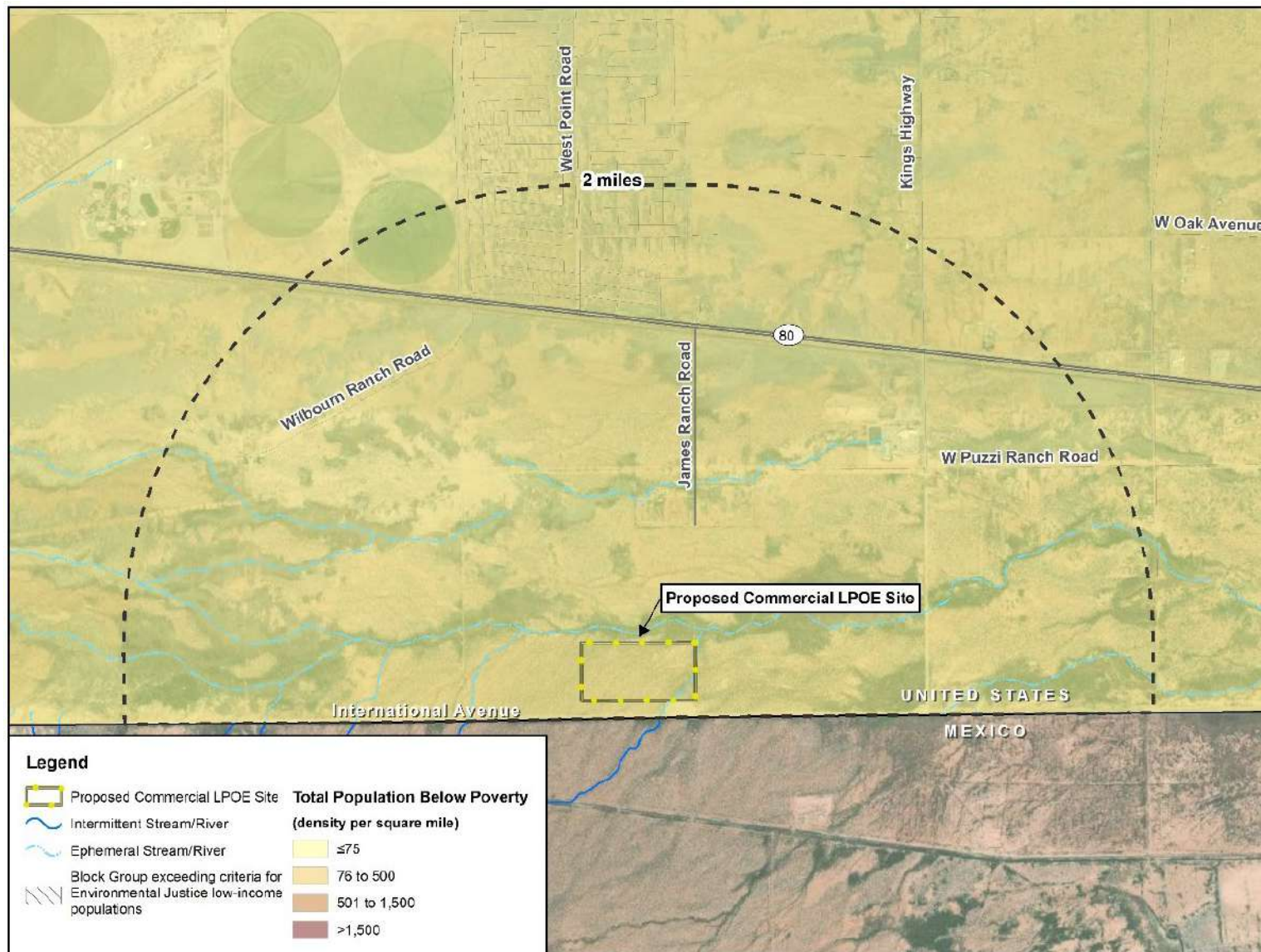


Figure 3.12-2. Low-Income Populations at Commercial Site

**RHC LPOE**

Table 3.12-2 summarizes the percentage of minority and low-income populations within 2 miles of the RHC LPOE site, Cochise County, and the State of Arizona for comparison purposes.

**Table 3.12-2. Minority and Low-Income Population within the Region of Influence**

Population Group	2-Mile ROI		Cochise County		Arizona	
	Pop.	Total (%)	Pop.	Total (%)	Pop.	Total (%)
Nonminority	1,604	10.7	69,095	54.6	3,883,722	54.1
Black or African American	209	1.6	4,512	3.6	305,973	4.3
Total Hispanic or Latino	13,408	85.6	44,858	35.5	2,260,690	31.5
American Indian/ Alaska Native	70	0.5	1,058	0.8	272,294	3.8
Asian	163	1.3	2,371	1.9	233,048	3.2
Other Minority <sup>a</sup>	1,416	10.8	4,548	3.6	218,337	3.0
<b>Total Minority</b>	<b>13,888</b>	<b>89.6</b>	<b>57,347</b>	<b>45.4</b>	<b>3,290,342</b>	<b>45.9</b>
<b>Total Population</b>	<b>15,492</b>	<b>100</b>	<b>126,442</b>	<b>100</b>	<b>7,174,064</b>	<b>100</b>
<b>Low Income</b>	<b>4,127</b>	<b>26.6</b>	<b>18,121</b>	<b>14.3</b>	<b>990,528</b>	<b>13.8</b>

Pop. = population; ROI = region of influence  
USCB 2020d and 2020e

<sup>a</sup> Other Minority = Native Hawaiian or Other Pacific Islander; Some other race; or Two or more races.

The average minority population percentage of Cochise County is approximately 46 percent, and a meaningfully greater minority population percentage relative to the general population of the county would exceed the 50 percent threshold defined by CEQ. Therefore, the lower threshold of 50 percent is used to identify areas with meaningfully greater minority populations within 2 miles of the RHC LPOE. All of the 15 block groups within the ROI have individual racial group minority populations or aggregate minority populations that meet the environmental justice criteria. The total minority population residing within the 2-mile ROI is approximately 13,888, or 89.6 percent of the entire population. The overall composition of the ROI is predominantly nonminority. Minority populations in the ROI are predominantly Hispanic or Latino, followed by Other Minority. Figure 3.12-3 displays the block groups identified as meeting the criteria for environmental justice minority populations surrounding the RHC LPOE, as well as the population density of minority populations within each block group.

Low-income populations were evaluated using the absolute 50 percent and the relative 120 percent or greater criteria for potentially affected block groups within the ROI. If a block group's percentage of low-income individuals met the 50 percent criterion or was more than 120 percent of the total low-income population within Cochise County (i.e., 18.3 percent), then the area was identified as having a low-income population. Figure 3.12-4 displays the block groups identified as meeting the criteria for environmental justice low-income populations surrounding the RHC LPOE, as well as the population density of low-income populations within each block group. Of the 15 block groups within the ROI, 9 block groups have low-income populations that meet the environmental justice criteria. The total low-income population residing within the 2-mile ROI is approximately 4,127, or 26 percent of the entire population.

Using USEPA's EJSCREEN model, all of the block groups within 2 miles of the RHC LPOE were analyzed against the 13 environmental justice indices. Of the 15 block groups within the ROI, all block groups fall above the 80<sup>th</sup> national or state percentile for one or more of the following indicators: Ozone (level in air); Traffic Proximity; Lead Paint (percent of housing units built prior to 1960); and UST (number of USTs within a 1,500 foot buffer block group). Of the 15 block groups within the ROI, all block groups are above the threshold for potential lead paint exposure, 12 block groups are above the threshold for ozone, 8 block groups are above the threshold for USTs, and 5 block groups are above the threshold for traffic.

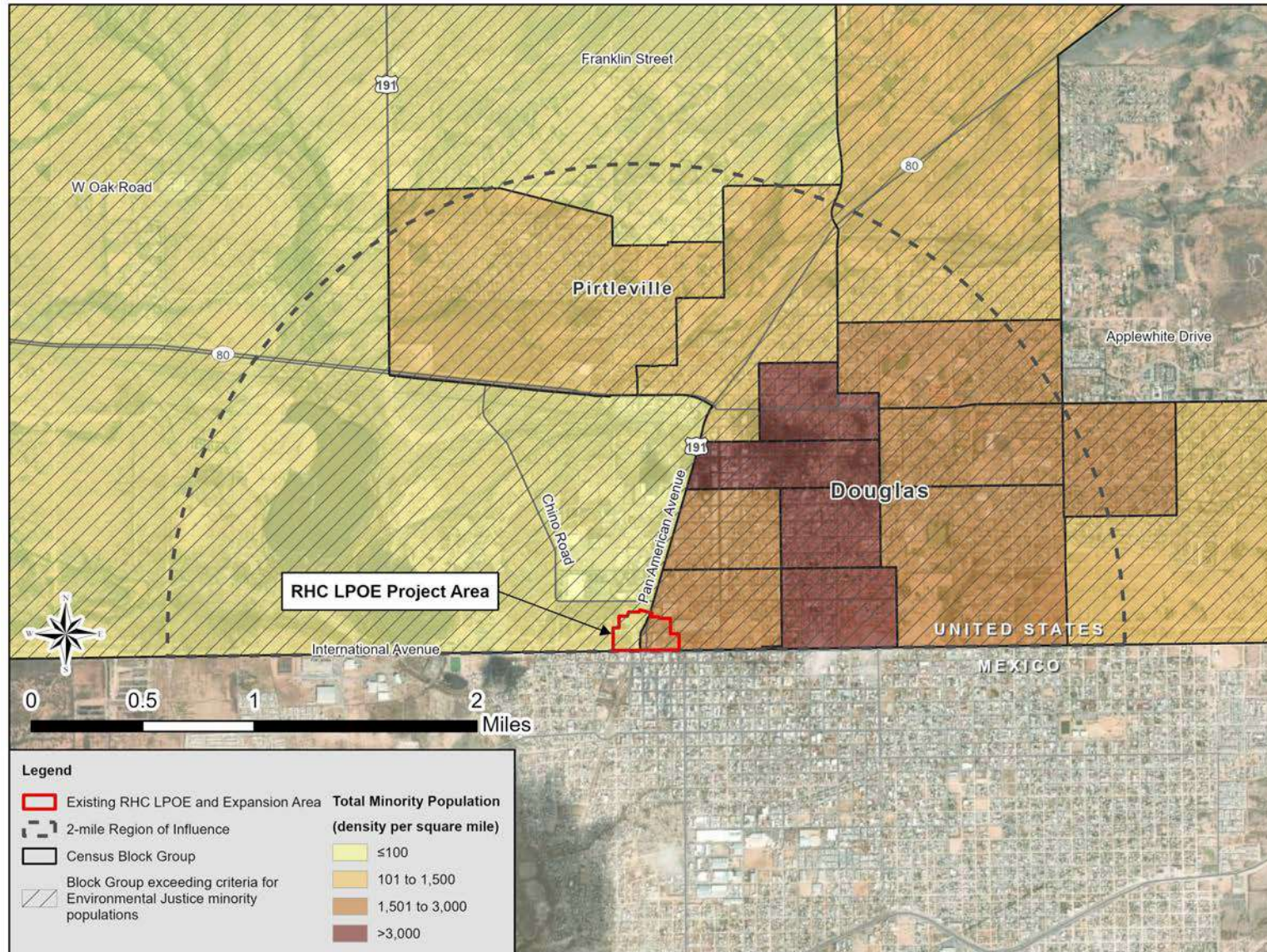


Figure 3.12-3. Minority Populations at RHC LPOE Expansion Site

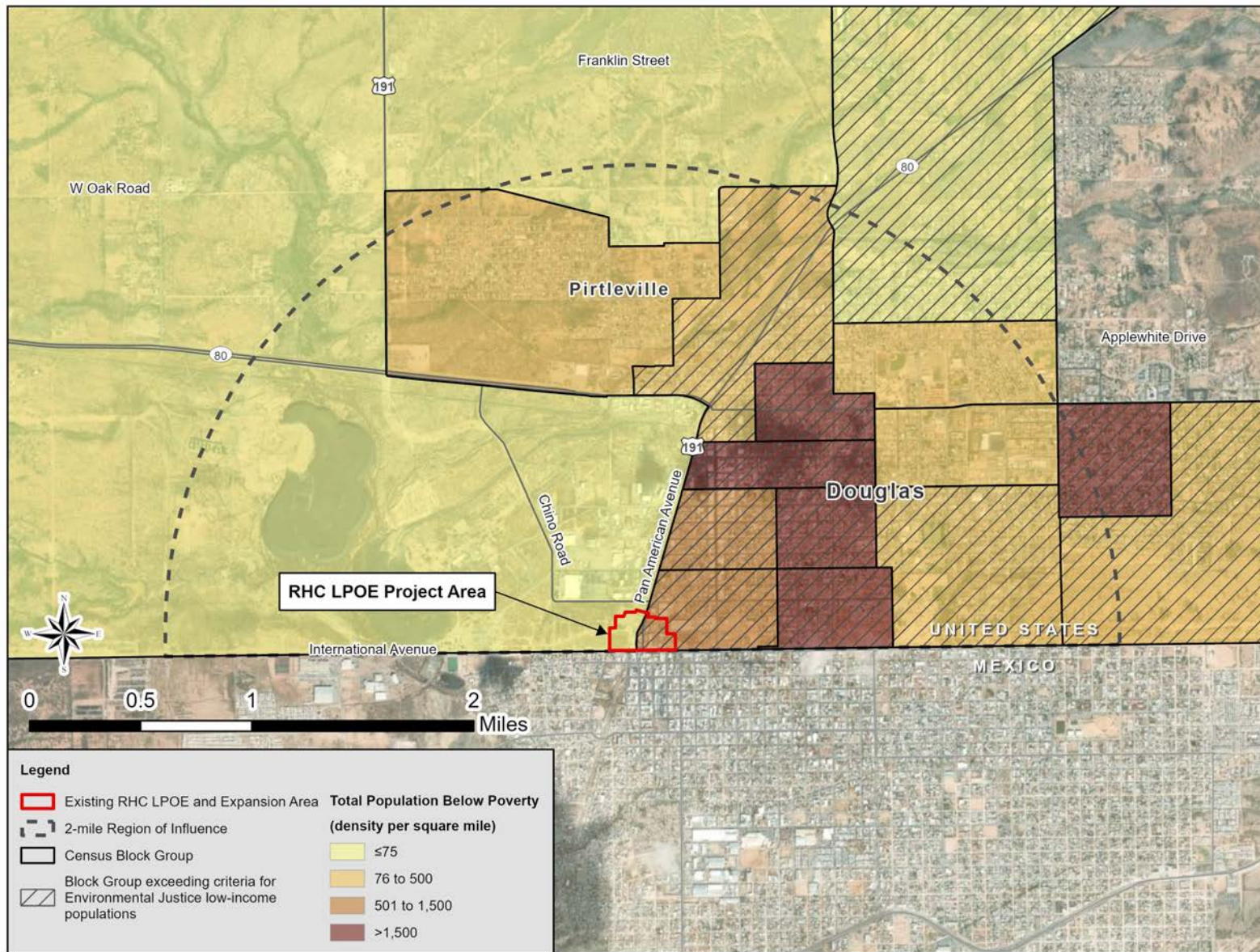


Figure 3.12-4. Low-Income Populations at RHC LPOE Expansion Site

**Protection of Children’s Health and Safety**

The Memorandum Addressing Children’s Health through Reviews Conducted Pursuant to the National Environmental Policy Act and Section 309 of the Clean Air Act recommends that an EIS “describe the relevant demographics of affected neighborhoods, populations, and/or communities and focus exposure assessments on children who are likely to be present at schools, recreation areas, childcare centers, parks, and residential areas in close proximity to the project area, and other areas of apparent frequent and/or prolonged exposure” (USEPA 2012).

The analysis for EO 13045 requires the assessment of readily available demographic data and information on local, regional, and national populations. The number and distribution of children under the age of 19 in the ROI are assessed to determine whether Alternatives 1, 2, or 3 would expose them to environmental health and safety risks.

**Commercial LPOE**

Table 3.12-3 shows the population of children under age 5 and 5 to 19 within 2 miles of the RHC LPOE, Cochise County, and Arizona. Section 3.3, Air Quality and Greenhouse Gas Emissions and Section 3.9, Noise also discuss locations of air pollutant- and noise-sensitive receptors, to include locations children may be present within 0.5 mile of the Commercial LPOE. Figure 3.12-5 shows the population density of child populations under 5 years in the only block group within 2 miles of the proposed Commercial LPOE.

**Table 3.12-3. Youth Populations in the Region of Influence**

Location	Children under Age 5 (%)	Children 5 to 19 Years (%)
2-Mile ROI	8.9	18.7
Cochise County	5.8	19.4
Arizona	6.0	19.6

ROI = region of influence  
 Source: USCB 2020f

**RHC LPOE**

Table 3.12-4 shows the population of children under age 5 and 5 to 19 within 2 miles of the RHC LPOE, Cochise County, and Arizona. Section 3.3, Air Quality and Greenhouse Gas Emissions and Section 3.9, Noise also show locations of air pollutant- and noise-sensitive receptors, to include locations children may be present within 0.5 mile of the RHC LPOE. Figure 3.12-6 shows the population density of child populations under 5 years in block groups within 2 miles of the RHC LPOE.

**Table 3.12-4. Youth Populations in the Region of Influence**

Location	Children under Age 5 (%)	Children 5 to 19 Years (%)
2-Mile ROI	8.5	28.8
Cochise County	5.8	19.4
Arizona	6.0	19.6

Source: USCB 2020f



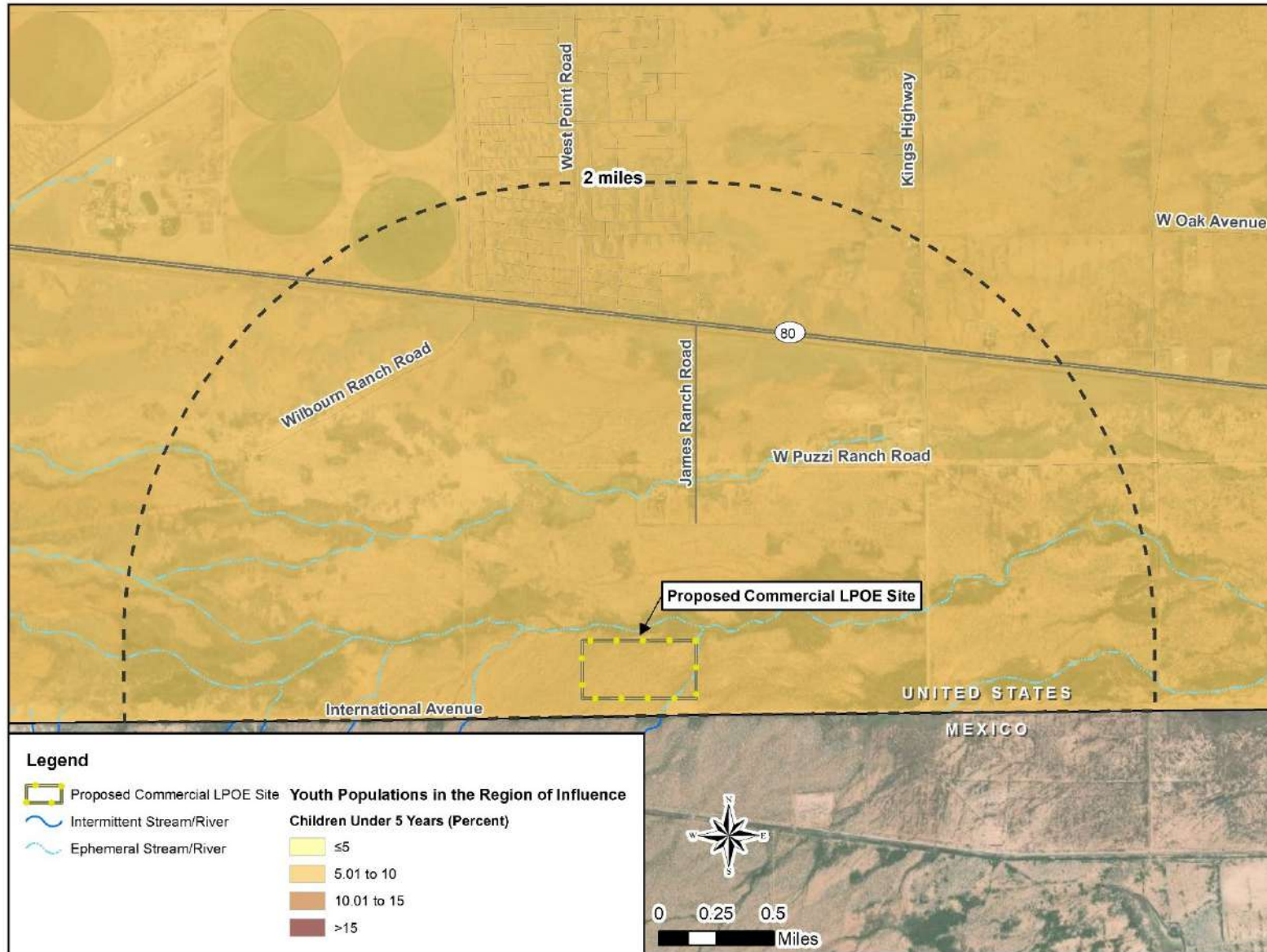


Figure 3.12-5. Child Populations at Commercial Expansion Site

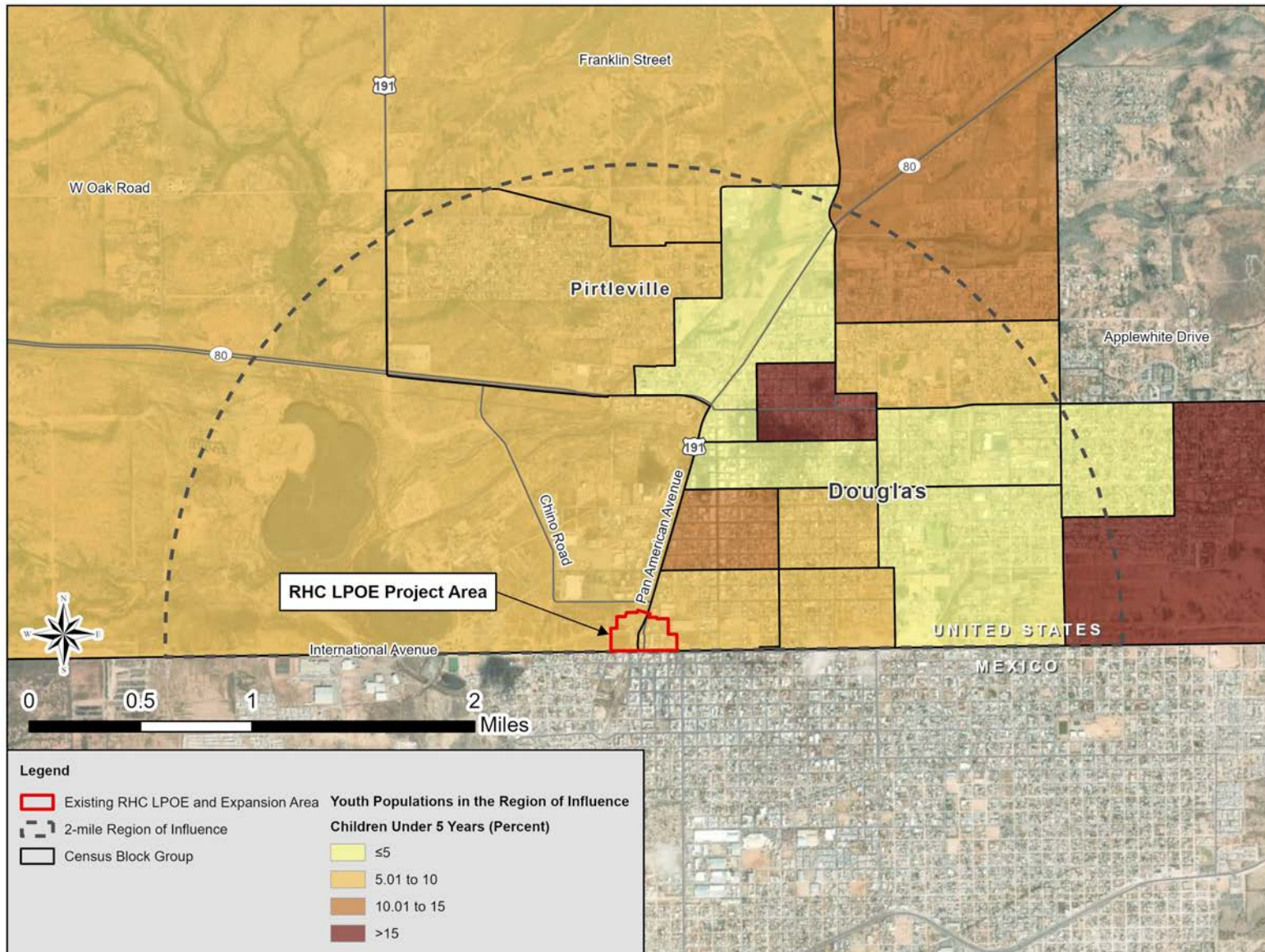


Figure 3.12-6. Child Populations at RHC LPOE Expansion Site

## 3.12.2 Environmental Consequences

### 3.12.2.1 Methodology

Consideration of the potential consequences for environmental justice requires three main components:

- 1) A demographic assessment of the affected community to identify the presence of minority or low-income and youth populations that may be potentially affected.
- 2) An assessment of all potential impacts identified to determine if any result in significant adverse impacts to the affected environment.
- 3) An integrated assessment to determine whether any disproportionately high and adverse impacts exist for minority or low-income groups and youth populations present in or near the RHC LPOE site and proposed Commercial LPOE site.

To evaluate the impacts on environmental justice resources, alternatives were reviewed for their potential to cause the following:

- Cause a disproportionately high and adverse effect on a low-income or minority population; or
- Cause a disproportionately high and adverse environmental health and safety risks to children.

Determination of significant impacts is informed by the USEPA's *Promising Practices for EJ Methodologies in NEPA Reviews* (USEPA 2016). Context and intensity of impacts on the impacted communities is considered when determining whether impacts from the Proposed Action would be considered significant under NEPA. Factors considered when determining significance of impacts to environmental justice (or children) populations include:

- Whether the action results in environmental, economic, or health impacts due to special vulnerabilities, unique routes of exposure, or cultural practices;
- The degree to which the action may establish a precedent for future actions with significant effects;
- Whether the action results in loss of significant cultural or historical resources;
- Whether the action results in impacts with specific concern to low-income or minority populations that are highly controversial.

### 3.12.2.2 No Action Alternative

Under the No Action Alternative, GSA would not construct a new Commercial LPOE or expand and modernize the existing RHC LPOE. Therefore, no impacts on environmental justice populations or children would occur. Potential beneficial impacts to environmental justice and child populations from removal of COVs through the city, as well as beneficial impacts to low-income populations from increased job opportunities would not occur.

### 3.12.2.3 **Alternative 1 – Sequential Construction**

#### **Construction**

##### **Commercial LPOE**

**Environmental Justice.** The proposed Commercial LPOE site is located within Census Tract 6, Block Group 1, which is identified as an environmental justice minority population (see Figure 3.12-3); however, three residential properties were identified within 1 mile of the Commercial LPOE (see Section 3.9.1.3). This EIS identified the following impacts that could occur during construction and that may affect minority populations surrounding the Commercial LPOE site.

- **Air Quality Impacts** – Short-term, minor, adverse, direct and indirect air quality impacts would be expected to disproportionately affect minority populations due to health impacts from increased air emissions from on-road and non-road construction vehicles during construction activities (see Section 3.3, Air Quality and Greenhouse Gas Emissions). Emissions, airborne dust, and soil surface disturbance from the use of on-road and non-road construction vehicles could degrade air quality in the area surrounding the proposed Commercial LPOE. The majority of the nitrogen oxide, SO<sub>2</sub>, and carbon monoxide emissions would be associated with vehicle and equipment exhaust. Since these emissions would occur at ground level, they would likely cause short-term increases in air pollutant emissions in the immediate vicinity of the project area. However, for purposes of this analysis, it was assumed that these emissions would not likely be transported more than one mile, except on windy days. The closest residential properties to the proposed Commercial LPOE are located approximately 2,500 and 5,500 feet to the north of the Commercial LPOE. No other structures are located within 1 mile of the Commercial LPOE; however, there are residences along James Ranch Road and SR-80. These residences may experience disproportionate impacts from degraded air quality due to increase construction traffic traveling to and from the Commercial LPOE, and impacts may be compounded due to existing air quality conditions. Notably, the project area is located in a nonattainment area for PM<sub>10</sub>, and a USEPA-designated maintenance area for SO<sub>2</sub>.
- **Congestion** – Short-term, minor, adverse transportation and traffic impacts would be expected to disproportionately affect minority populations due to increased congestion (see Section 3.8, Transportation and Traffic) and, therefore, delays accessing emergency and urgent care facilities. Medical facilities are located in Bisbee to the west and Douglas to the east of the proposed Commercial LPOE (see Section 3.11, Socioeconomics). Minority populations near the proposed Commercial LPOE may be delayed during construction activities in reaching these facilities; conversely, an ambulance or other emergency services (i.e., police, fire) may be delayed accessing residences near James Ranch Road or SR-80 near the Commercial LPOE. In the case of an accident, time delays due to traffic or congestion from the demolition and redevelopment activities under the Alternative 1 could have serious consequences, although the likelihood of this occurrence is low.
- **Noise Disturbances** – Disproportionate impacts from noise disturbances are not anticipated. The closest sensitive receptors identified to the Commercial LPOE site are three residential properties located approximately 2,500 and 5,500 feet to the north. The estimated noise level resulting from construction activities would be approximately 56 dBA at the closest property line of the residences located at a 2,500-foot distance, which is considered below “intrusive” (see Section 3.9.1.2). Noise impacts would be minimized to the extent possible by standard noise control measures, such as project scheduling, noise barriers, and using noise controls on equipment (e.g., mufflers). Activities would be consistent with normal construction activities and would be conducted during normal business hours. Noise impacts from increased construction vehicle traffic are not anticipated to disproportionately affect residences near James Ranch Road or SR-80 as the truck transport would be intermittent, would be restricted to typical business hours, and commuter traffic would be limited to daily construction start and end times.

- **Job Opportunities** – Economic impacts could disproportionately benefit minority and low-income populations throughout the region in search of a job. Minor beneficial impacts would occur due to the creation of direct, indirect, and induced jobs associated with the Alternative 1 (see Section 3.11, Socioeconomics). The social and economic benefits job creation would not be permanent and would largely be reversed in the long term, after construction is complete. Approximately 50 to 100 direct jobs would be created during construction; some of these jobs would be locally sourced, although others may come from the Phoenix and Tucson areas. Indirect or induced jobs could be created from project-related spending and worker spending. Jobs and income are strongly associated with a number of beneficial health outcomes, such as an increase in life expectancy, improved child health status, improved mental health, and reduced rates of chronic and acute disease morbidity and mortality (HDA 2004; Cox et al. 2004).

While environmental justice populations may be disproportionately affected, none of the above impacts are anticipated to be disproportionately high and adverse; and overall short-term, minor adverse impacts to environmental justice populations are anticipated.

**Protection of Children.** Negligible to minor impacts are expected to child populations during construction. There are no sites that children may regularly attend (e.g., childcare centers or schools, community centers, or recreational facilities) within 2 miles of the proposed Commercial LPOE, therefore child populations are not expected to spend time in the vicinity of the Commercial LPOE construction. As discussed under Environmental Justice, there are potential sensitive receptors along James Ranch Road and SR-80 that may experience impacts from degraded air quality due to increase construction traffic traveling to and from the Commercial LPOE. Depending on the presence of children at these residences, children could be adversely affected by increased vehicle emissions. Children are especially vulnerable due to higher relative doses of air pollution, smaller diameter airways, and more active time spent outdoors and closer to ground-level sources of vehicle exhaust.

### **RHC LPOE**

**Environmental Justice.** The RHC LPOE is located within Census Tract 9.01, Block Group 3 and within 2 miles of multiple environmental justice block groups as shown on Figures 3.12-1 and 3.12-2. Similar impacts would occur as described for the proposed Commercial LPOE to populations surrounding the RHC LPOE.

- **Air Quality Impacts** – Short-term, minor, adverse, direct and indirect air quality impacts would be expected to disproportionately affect minority and low-income populations due to increased air emissions from on-road and non-road vehicles during construction activities, similar to as described for the proposed Commercial LPOE. Impacts would be most acute to residences and sensitive receptors to air pollutants closest to the RHC LPOE, and noticeable within 1 mile of the site (see Table 3.9-3). Recreational users of nearby parks within 1 mile (3<sup>rd</sup> Street Park, Paseo de las Americas Linear Park, and Tenth Street Park) would also experience disproportionate impacts. Once construction ceases, air emissions and ambient pollutant concentrations from on-road and non-road vehicles and traffic would return to existing levels. Emissions would be reduced through the use of BMPs such as watering of soils during excavation.
- **Congestion** – Short-term, minor, adverse transportation and traffic impacts would be expected to disproportionately affect minority and low-income populations due to increased congestion and, therefore, delays accessing emergency and urgent care facilities or services in Douglas, similar to as described for the proposed Commercial LPOE. The closure of Customs Avenue between Pan American Avenue and 1<sup>st</sup> Street for the expanded RHC LPOE layout would require the relocation of a bus stop on Customs Avenue and may affect city bus routes. Although expected to be a permanent but minor impact, these changes could disproportionately affect low-income populations that are more reliant on public transportation.

- **Noise Disturbance** – Short-term, minor, adverse noise impacts would be expected to disproportionately affect minority and low-income populations near the RHC LPOE due to noise disturbances associated with the use of heavy equipment and construction traffic. Noise would be felt most by users at the Paseo de las Americas Linear Park adjacent to the western boundary of the existing port, as well as residences within 100 feet to 600 feet of the RHC LPOE. Noise impacts would be minimized to the extent possible by standard noise control measures, such as project scheduling, noise barriers, and using noise controls on equipment (e.g., mufflers). Activities would be consistent with normal construction activities and would be conducted during normal business hours. Noise would be short-term, intermittent and temporary until the construction phase is over. Furthermore, increases in noise levels during construction at the RHC LPOE would be offset because of the relocation of COV operations to the new facility.
- **Job Opportunities** – Economic impacts could disproportionately benefit minority and low-income populations in search of a job throughout the region. Impacts would be similar to as described for the proposed Commercial LPOE.

While environmental justice populations may be disproportionately affected, none of the above impacts are anticipated to be disproportionately high and adverse; and overall short-term, minor adverse impacts to environmental justice populations are anticipated.

**Protection of Children.** There could be minor to moderate adverse impacts to child populations during construction. Within 3,000 feet of the RHC LPOE, there are three sites identified that children may regularly attend (e.g., childcare centers or schools, community centers, or recreational facilities; see Tables 3.3-2 and 3.9-2) that could be adversely affected from construction. These include 3<sup>rd</sup> Street Park (700 feet), Center for Academic Success (1,800 feet), and Head Start Douglas (1,900 feet).

Temporary, minor adverse impacts to child populations are anticipated due to increased level of noise created by construction equipment and vehicles could affect children's learning, especially near homes, schools, and recreational areas, including at 3<sup>rd</sup> Street Park. Noise levels would be greatest when children are outdoors, which is for a short period of the day. Offsite receptors located between 100 feet to 600 feet could experience the combined noise levels of 68.5 dBA to 88.5 dBA.

Temporary, minor adverse impacts to child populations due to construction air emissions could occur during construction, particularly those closest to the construction site (i.e., at 3<sup>rd</sup> Street Park). Children are especially vulnerable due to higher relative doses of air pollution, smaller diameter airways, and more active time spent outdoors and closer to ground-level sources of vehicle exhaust. Similar to as described for environmental justice populations, emissions would be reduced through the use of BMPs such as watering of soils during excavation.

## **Operations**

### ***Commercial LPOE***

**Environmental Justice.** The EIS identified the following impacts that could occur during operations and that may affect populations surrounding the Commercial LPOE site.

- **Air Quality Impacts** – Long-term, minor, adverse impacts would be expected to disproportionately affect minority populations from the introduction of COVs on James Ranch Road and increase of COVs on SR-80 (between James Ranch Road and US-191) and associated health impacts from vehicle emissions (see Section 3.3. Air Quality and Greenhouse Gas Emissions).
- **Congestion** – Disproportionate impacts on minority populations from congestion during operations of the Commercial LPOE are not anticipated. Although there would be increased traffic on James Ranch Road and SR-80 (between James Ranch Road and US-191), this traffic is not anticipated to

degrade roadway LOS or affect minority populations from reaching emergency and urgent care facilities or services.

- **Noise Impacts** – Minor, permanent adverse impacts would be expected to disproportionately affect minority populations from operations of the Commercial LPOE and introduction of COVs. The Commercial LPOE would be a new, permanent source of noise for the area due to vehicular traffic as COVs would enter and exit through this facility, and a new indoor firing range would be located at the Commercial LPOE. Receptors located on James Ranch Road and SR-80 (between James Ranch Road and US-191) would experience an increase in intermittent noise levels from the COVs during operating hours.
- **Job Opportunities** – Economic impacts could disproportionately benefit minority and low-income populations in search of a job throughout the region. There would be long-term, negligible to moderate permanent economic benefits as a result of the operation of the two-port solution to the surrounding region, as described in Section 3.11, Socioeconomics. Impacts would be similar to as described for construction but would be permanent.

While environmental justice populations may be disproportionately affected, none of the above impacts are anticipated to be disproportionately high and adverse; and overall long-term, minor adverse to minor beneficial impacts to environmental justice populations are anticipated.

**Protection of Children.** Negligible impacts are expected to child populations during operations. There are no sites that children may regularly attend (e.g., childcare centers or schools, community centers, or recreational facilities) within 2 miles of the proposed Commercial LPOE, therefore children between the ages of 5 and 19 are not expected to spend time in the vicinity of the newly constructed Commercial LPOE during operation. Any potential future development that directly or indirectly occurs near the Commercial LPOE (as discussed in Section 3.11, Socioeconomics) is unlikely to attract child populations.

**Climate Risk.** Long-term impacts related to climate change in the Southwest are discussed in Section 3.3.1.3. Generally, these impacts include long-term increases in temperatures, persistent drought and reduction in water availability, impacts on food production, and associated health impacts with these conditions. Decreased food and water availability could also further increase costs associated with accessing these resources, which could disproportionately affect low-income populations. Over time, minority and low-income populations and children in the project area would likely become more susceptible to these impacts. Alternative 1 would result in only negligible incremental contributions to global GHG emissions and climate change; however, the adverse impacts on environmental justice populations discussed above, particularly air quality impacts along roads near the proposed Commercial LPOE, may become more pronounced in the long term as a result of climate change impacts.

### **RHC LPOE**

**Environmental Justice.** The EIS identified the following impacts that could occur during operations and that may affect populations surrounding the RHC LPOE.

- **Air Quality Impacts** – Long-term, minor, beneficial impacts would be expected to disproportionately affect minority and low-income populations from removal of COVs traveling through downtown Douglas and associated health benefits from reduction in vehicle emissions.
- **Congestion** – Long-term, minor beneficial impacts would be expected to disproportionately affect minority and low-income populations from removal of COVs traveling through downtown Douglas and improvements on circulation in the city.
- **Noise Disturbances** – Minor permanent beneficial impacts would be expected to disproportionately affect minority and low-income populations from removal of COVs traveling through downtown Douglas and improvements on circulation in the city.

- **Job Opportunities** – Economic impacts could disproportionately benefit minority and low-income populations in search of a job throughout the region, similar to as described for the Commercial LPOE.
- **Loss of Recreational Space** – There would be a permanent, minor adverse impact from the loss of recreational space in Douglas from the conversion of a city park and public washroom in the Alternative 1 Expansion Area. This would disproportionately impact minority and low-income populations ability to access recreational spaces near the RHC LPOE; however, there are park spaces within 0.1 miles including Paseo de las Americas Linear Park and the 3<sup>rd</sup> Street Park (which includes a public washroom).

While environmental justice populations may be disproportionately affected, none of the above impacts are anticipated to be disproportionately high and adverse; and overall long-term, minor beneficial to environmental justice populations are anticipated.

**Protection of Children’s Health and Safety.** Negligible to minor beneficial and adverse impacts are expected to child populations during operations. The expansion of the RHC LPOE would result in permanent loss of the city park that children frequent adjacent to the RHC LPOE. However, impacts to the other three sites that children may regularly attend (e.g., childcare centers or schools, community centers, or recreational facilities) within 2 miles of the RHC LPOE would be beneficial, as children would experience less intense noise and emissions than prior to the project, due to the rerouting of commercial traffic to the Commercial LPOE. Any potential future development that indirectly occurs near the RHC LPOE (as discussed in Section 3.11, Socioeconomics) is unlikely to attract child populations.

**Climate Risk.** Long-term impacts from climate change on minority, low-income, and child populations would be similar to as described as for the Commercial LPOE; however, operations of the RHC LPOE are expected to have a net benefit impact on environmental justice populations.

#### **Alternatives 1a – 1d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 1a through 1d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.1.2.1. As these sub-alternatives would take place within the footprint of the RHC LPOE, the potential impacts to environmental justice and children’s health and safety as already identified under Alternative 1 would not change.

#### **3.12.2.4 Alternative 2 – Concurrent Construction (Westward Expansion)**

##### **Construction**

Impacts during construction of Alternative 2 would be similar to as described for Alternative 1 for both the Commercial LPOE and RHC LPOE. Impacts to environmental justice and child populations would last for a shorter duration than under Alternative 1; however, noise and emissions are likely to have greater intensity under Alternative 2.

##### **Operations**

Impacts during operations of the Commercial LPOE and RHC LPOE under Alternative 2 would be the same as described for Alternative 1. However, because the expansion area is greater under Alternative 2, impacts could be slightly more adverse. In addition to the city park, there could potentially be loss of trails of Paseo de Las Americas Linear Park that children frequent.

#### **Alternatives 2a – 2d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 2a through 2d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.2.1. As these sub-alternatives would take place within the footprint of the RHC LPOE, the potential impacts to environmental justice and children’s health and safety as already identified under Alternative 2 would not change.



### **3.12.2.5 Alternative 3 – Concurrent Construction (Eastward Expansion)**

#### **Construction**

The acquisition of three residences in the Alternative 3 Expansion Area would displace occupants in an area characterized by high concentrations of minority and low-income populations. Although not significant at a population level, environmental justice impacts may be greater for Alternative 3 than for the other alternatives. Similarly, the potential displacement for Alternative 3 of families with children living in the residences may affect the health and safety of child populations in the area more adversely than would the other alternatives. GSA would negotiate with private landowners as applicable during the land acquisition process to provide fair compensation. Otherwise, impacts during construction of Alternative 3 would be similar as described for Alternative 1 both for the Commercial LPOE and RHC LPOE. Impacts to broader environmental justice and child populations would last for a shorter duration than under Alternative 1; however, noise and emissions are likely to have greater intensity under Alternative 3.

#### **Operations**

Impacts during operations of the Commercial LPOE and RHC LPOE under Alternative 3 would be the same as described for Alternative 1. However, because the expansion area is greater under Alternative 3, impacts could be slightly more adverse.

#### **Alternatives 3a – 3d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 3a through 3d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.2.1. As these sub-alternatives would take place within the footprint of the RHC LPOE, the potential impacts to environmental justice and children's health and safety as already identified under Alternative 3 would not change.

### **3.12.2.6 Impact Reduction Measures**

Impact reduction measures for resources specific to environmental justice are discussed in the respective sections (i.e., Sections 3.3, Air Quality and Greenhouse Gas Emissions; Section 3.4, Land Use and Visual Resources; Section 3.8, Transportation and Traffic; and Section 3.9, Noise).

### 3.13 HUMAN HEALTH AND SAFETY

This section discusses human health and safety, which includes direct and indirect factors that have the potential to affect the human population or workers associated with the Proposed Action and its alternatives as discussed in Chapter 2. Direct factors include exposure to chemicals, extreme temperatures, and weather, while indirect factors include physical safety and security of the surrounding environment. Factors in the project area that could affect human health and safety include automobile or pedestrian accidents, workplace accidents, criminal activities, extreme weather, and exposure to hazardous waste and materials.

#### 3.13.1 Affected Environment

##### 3.13.1.1 *Region of Influence*

The ROI for human health and safety focuses on the RHC LPOE, the proposed Commercial LPOE site, and directly adjacent areas surrounding both sites, including the expansion areas for Alternatives 1, 2, and 3.

##### 3.13.1.2 *Regulatory Setting and Requirements*

**Hazardous Waste and Materials.** The purpose of the Comprehensive Environmental Response, Compensation, and Liability Act, often referred to as Superfund, is to clean up contaminated sites so that public health and welfare are not compromised. The Federal Resource Conservation and Recovery Act of 1976 (RCRA) provides for “cradle to grave” regulation of hazardous wastes. Other federal laws applicable to hazardous waste and materials include: Community Environmental Response Facilitation Act of 1992; CWA; CAA; Safe Drinking Water Act; OSHA; Atomic Energy Act; Toxic Substances Control Act; and Federal Insecticide, Fungicide, and Rodenticide Act. U.S. Department of Transportation regulations at 49 CFR 100-185 govern transportation of hazardous materials.

In addition to the acts and laws mentioned above, EO 12088, *Federal Compliance with Pollution Control*, mandates that necessary actions be taken to prevent and control environmental pollution when federal activities or federal facilities are involved.

Hazardous waste in Arizona is regulated primarily under the authority of the RCRA and the Arizona Health and Safety Code. Other Arizona laws regarding hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Worker health and safety and public safety are key issues when dealing with hazardous materials that may affect human health and the environment.

For this analysis, the terms hazardous waste, hazardous materials, and toxic substances include those substances defined as hazardous by Comprehensive Environmental Response, Compensation, and Liability Act; RCRA; and the Spill Prevention, Control, and Countermeasures Rule. In general, they include substances that, because of their quantity; concentration; or physical, chemical, or toxic characteristics, may present moderate danger to public health or welfare or the environment when released into the environment.

**Worker Safety.** As a division of the Industrial Commission of Arizona, the Arizona Division of Occupational Safety and Health operates under an approved plan with the U.S. Department of Labor to regulate occupational safety and health issues within Arizona. The Arizona Occupational Safety and Health Plan adopts federal OSHA standards and has several additional, unique standards for general industry, commercial driving operations, construction, fall protection, and enforcement programs, among others (OSHA 2022). The plan governs both private-sector and public-sector workplaces, with the exception of federal government employers.

The occupational health and safety concerns of federal employers and employees are the responsibility of OSHA. OSHA regulations applicable to the Proposed Action include 29 CFR 1910 and 29 CFR 1926, which cover general industry and construction regulations, respectively. Hazards faced by personnel at construction sites or in commercial workplaces could include injuries sustained from collisions with moving vehicles, lifting and moving equipment, and contact with hazardous substances during inspections.

### 3.13.1.3 Existing Conditions

#### **Commercial LPOE**

A Phase I Environmental Site Assessment was completed for the proposed Commercial LPOE in August 2019 (Terracon 2019). This Phase I Environmental Site Assessment was used to identify potential Recognized Environmental Conditions (RECs), as defined by the guidelines (E 1527-13) of the American Society for Testing and Materials, associated with current and past uses of the property.

The proposed Commercial LPOE is located on undisturbed and undeveloped native desert land, with the closest structure located approximately 1.5 miles northeast. Although the 2019 Phase I Environmental Site Assessment did not conclude any RECs or pre-existing hazardous waste/material resource concerns, documentation of an existing smoke easement on the property was identified after the completion of the assessment. The smoke easement pertaining to the proposed Commercial LPOE site indicates restrictions and conditions imposed upon the land by reason of its inclusion (at the time of the easement) within the Douglas INA. The smoke easement purposes are related to events from the 1920s, in which the owner of the property claimed damages to the soil, vegetation, crops, trees, and livestock on the land from smoke, gases, fumes, dust, and vapors of nearby smelter facilities located to the east of the property (see *Nearby Facilities of Concern*, below). The parties cited as responsible for the alleged damages include the Calumet & Arizona Mining Company and the Phelps Dodge Corporation. The cited parties denied the claim, but all parties involved decided to settle, and therefore the smoke easement was granted absolving and releasing the cited parties (Calumet & Arizona Mining Company and Phelps Dodge Corporation) of any and all claims of damages past, present, or future to the property from the operation of the smelters. The easement also provided the right for the parties to continue operation of the smelters. The existence of this smoke easement provided a basis for potential contamination to exist on the proposed Commercial LPOE site.

Due to the discovery of the smoke easement on the proposed Commercial LPOE, GSA conducted soil sampling and laboratory testing to prevent exposure to workers or the release of hazardous waste and materials to the environment from the Proposed Action. GSA completed a Phase II Environmental Site Assessment (GSA 2023b), which included a grid of 40 sampling sites covering the Commercial LPOE site. Surface soil samples (0- to 6-inch depth) were collected in March 2023 at all 40 locations to investigate the potential presence of shallow soil impacts from the previous smelter operations. Because the smelter operations consisted of airborne releases, any contamination would occur in shallow soils. Additional soil samples were collected at 20 of the sampling locations (every other site) at targeted depths of 5 feet and 10 feet. The purpose of the deeper borings was to help determine whether any metals detected at the surface could be attributed to naturally occurring background concentrations. If concentrations of certain metals were consistent or increased with depth, it could be inferred that the metals are the result of geologic conditions and not from surficial contamination.

In total, 80 soil samples were collected and tested for arsenic, barium, cadmium, chromium, copper, lead, mercury, selenium, and silver. All results were compared to ADEQ Non-residential Soil Remediation Levels (SRLs). Arsenic was detected in every sample collected, of which 49 soil samples equaled or exceeded the ADEQ Non-Residential SRL for arsenic of 10 milligrams per kilogram (mg/kg). These included 26 surface samples (0- to 6-inch depth); 9 samples in the 4- to 6-foot depth range; and 14 samples collected from the 6- to 10-foot depth range. Mercury and silver were not detected in any sample collected. At least one detection of all other metals was observed in all samples; however, these concentrations did not exceed their respective ADEQ Non-Residential SRLs.

Based on the analysis of sampling data, the study concluded that the relatively consistent levels of arsenic across the proposed Commercial LPOE site and at all depth intervals strongly suggests that the presence of arsenic is the result of naturally occurring background conditions and not the result of surface contamination caused by the smelter emissions. Therefore, based on the results of the Phase II Environmental Site Assessment for the proposed Commercial LPOE location, no further action is required.

## **RHC LPOE**

The RHC LPOE has operated since 1914, with existing facilities constructed in 1933. The City of Douglas was founded as a smelter town to treat copper ore, and the regional economy was historically driven by the local mining industry. While there are no longer any active smelting operations in Douglas, mining operations in neighboring cities still exist, regularly transporting heavy mining machinery and hazardous materials and waste over the U.S.-Mexico border, through the RHC LPOE, into downtown Douglas, and throughout the surrounding areas.

A Phase I Environmental Site Assessment was prepared in October 2022 to establish existing conditions within the RHC LPOE and expansion areas for Alternatives 1 and 2 (GSA 2022b). A second Phase I Environmental Site Assessment was prepared for the Alternative 3 Expansion Area in June 2023 (GSA 2023a). These Phase I Environmental Site Assessments were performed in accordance with current American Society for Testing and Materials guidelines (E1527-21) and USEPA's "Standards and Practices for All Appropriate Inquiries" (Title 40 CFR 312). The findings of these Phase I Environmental Site Assessments, as summarized below, are used to evaluate the consequences of the Proposed Action and its alternatives with respect to hazardous waste and materials with the potential to affect human health and safety.

**RHC LPOE.** The RHC LPOE site previously contained a historic leaking underground storage tank (LUST) that was installed in 1934 and closed in-place in 1990. The former LUST was located adjacent to the west wall of the RHC LPOE Main Building. The LUST was a 1,000-gallon tank used to store diesel fuel for a boiler in the basement of the Main Building. In 1991 the UST and associated piping was excavated and removed from the site. Soil samples collected from beneath the former tank location detected concentrations of total petroleum hydrocarbons (TPH) above the ADEQ's suggested soil cleanup level. A Phase II Environmental Site Assessment was performed at the site in 1992 during which 25 soil samples were collected and 4 groundwater monitoring wells were installed. Laboratory analysis of the collected soil samples detected TPH concentrations above the suggested soil cleanup level around the former tank location and a benzene concentration above the Arizona Aquifer Water Quality Standard in three of the four groundwater samples (EAI 2006a). Approximately 445 tons of TPH-contaminated soils were excavated from the former LUST site. Some inaccessible contaminated soils were left in place beneath the building. In August 2005, the ADEQ Solid Waste Inspection and Compliance Unit provided a "No Further Action" determination to close out the soil contamination case. In 2006, a fifth monitoring well was installed and a total of four rounds of groundwater sampling were conducted from the installed monitoring wells. Results from the sampling events indicated no detection of TPH, volatile organic compounds (VOCs), or polycyclic aromatic hydrocarbons (PAHs) above Arizona Aquifer Water Quality Standard or other ADEQ standards (EAI 2006b). A "No Further Action" determination was issued by ADEQ in 2007 to close the groundwater case (Jacobs 2020).

### **Alternative 1 Expansion Area.**

The expansion area directly north of the RHC LPOE between Pan American Avenue and the separate parking area for the LPOE north of 1<sup>st</sup> Street consists of land parcels containing a small city park, a duty-free shop, a FMCSA facility, an impound lot, and a contractor yard. The Phase I Environmental Site Assessment (GSA 2022b) did not identify hazards specific to the Alternative 1 Expansion Area that would indicate a need for further investigation. However, the expansion area may be subject to potential contamination from surrounding sources discussed for the RHC LPOE, Alternative 2 Expansion Area, Alternative 3 Expansion Area, and Nearby Facilities of Concern.

### **Alternative 2 Expansion Area.**

The expansion area directly to the west of the RHC LPOE, across from Pan American Avenue, consists of undeveloped, open land historically used as a holding area for cattle prior to 2001. Coordination with the property owner during the Phase I Environmental Site Assessment (GSA 2022b) indicated that cattle were

often treated in pesticide dipping vats in Mexico before being brought over the border into the U.S. and held in the holding area. Cattle dipping vats historically have been used to treat cattle with chemical and pesticide solutions, often containing arsenic, to kill disease-carrying ticks. There is the potential that the cattle were periodically hosed down in this area, creating the potential that any chemicals or substances applied in the dipping vats may have been washed off and leached into the shallow subsurface of the ground. This area is currently unused; however, illicit dumping of construction and demolition debris, as well as other unidentified solid waste debris, were observed on the site during the Phase I Environmental Site Assessment. This debris could include ACM, materials with LBP, wood treated with creosote or chromated copper arsenate, contaminated concrete, or other potentially hazardous materials.

Another portion of the expansion area, across Pan American Avenue to the northwest of the RHC LPOE, was formerly the site of a manufactured gas plant (MGP). This portion of the expansion area is presently crossed by an El Paso Natural Gas Easement and gas pipeline. The MGP was located on the site from approximately 1905 through 1947 and operated until about 1932 when MGP operations were terminated. The property continued to supply natural gas to the City of Douglas until 1966 under ownership of APS. A site investigation and interim remedial action was initiated in 1995 due to historical use of the site. Analytical soil sample results identified a number of contaminants of concern (COCs) including various PAHs and elevated presence of lead and arsenic. Interim remedial actions included demolition of the MGP facility and removal of 1,274 tons of contaminated soils and fill material.

In 2019 APS initiated additional remediation activities at the former MGP under the ADEQ VRP. Prior to remediation, the city removed debris piles consisting of construction debris that was illicitly dumped on the site between 1998 and 2019. Additional soil sampling was conducted, and three groundwater monitoring wells were installed for sampling. Analytical soil sample results continued to indicate presence of lead, arsenic, and PAHs exceeding residential and non-residential soil remediation levels (Jacobs 2019). However, analytical results from the groundwater samples collected from the monitoring wells indicated that all COCs were below the Arizona Aquifer Water Quality Standard and site-specific Arizona groundwater protection limits (Jacobs 2021a). Additional excavation and disposal of a total of 38,191 tons of material was conducted. The material removed included 37,465 tons of Arizona Special Waste soil and stained concrete, 699 tons of recycled construction debris (uncontaminated asphalt and concrete), 25 tons of scrap metal and tree debris, and 0.14 ton of non-friable ACM (Jacobs 2021b). On March 25, 2022, the ADEQ VRP granted APS a “No Further Action” determination for the former MGP site (ADEQ 2022f).

Due to the potential for soils contamination identified in the Alternative 2 Expansion Area summarized above and the proximity of the area to the historical smelter operations as summarized for the proposed Commercial LPOE, GSA conducted soil sampling and laboratory testing to prevent exposure to workers or the release of hazardous waste and materials to the environment from the Proposed Action. GSA completed a Phase II Environmental Site Assessment (GSA 2023c) on three REC sites on the property. REC-1 was designated as the entire 23-acre Alternative 2 footprint, which includes both the Alternative 1 and 2 Expansion Areas. The contaminants of concern in REC-1 included the metals arsenic, barium, cadmium, chromium, copper, lead, mercury, selenium, and silver. REC-2 was limited to an approximately 4-acre area located on the southeast portion where the cattle holding facilities were located. The contaminants of concern in REC-2 were organochlorine pesticides, as well as arsenic and lead. REC-3 is limited to areas along and immediately adjacent to debris piles identified in the Phase I Environmental Site Assessment, which covers an area of approximately 1 acre. Since the exact origin and nature of the debris is unknown, the contaminants of concern for REC-3 are wide-ranging and include semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), and an expanded list of metals including the metals listed for REC-1 (except mercury), as well as aluminum, antimony, beryllium, calcium, cobalt, iron, magnesium, manganese, nickel, potassium, vanadium, and zinc.

In total, 40 soil samples were collected at the Alternative 2 Expansion Area in March 2023. For REC-1 a total of 15 shallow samples (0- to 6-inch depth) and 20 deep samples (4 to 10 feet below ground surface) were collected across accessible areas of the site. If concentrations of certain metals were consistent or

increased with depth, it could be inferred that the metals are the result of geologic conditions and not from surficial contamination by airborne emissions from smelter operations. For REC-2, 10 of the shallow samples from REC-1 were tested additionally for organochlorine pesticides, which are not naturally occurring. For REC-3, a total of 10 shallow soil samples (0- to 6-inch depth) were collected immediately adjacent to the debris piles.

In 35 samples at REC-1, arsenic was detected in every sample collected. A total of 29 soil samples exceeded the ADEQ Non-Residential SRL for arsenic of 10 mg/kg. These included 11 surface samples (0- to 6-inch depth); all 10 samples in the 4- to 6-foot depth range; and in 9 of the 10 samples collected at 9.5 to 10 feet. The relatively consistent levels of arsenic across the site, as well as increasing concentrations with depth, strongly suggested that the presence of arsenic is the result of naturally occurring background conditions and not the result of surface contamination caused by the smelter emissions. Mercury was not detected in any sample collected. At least one detection of all other metals was observed in all samples; however, these concentrations did not exceed their respective Arizona Non-Residential SRLs. Further, no concentrations of any metals (except arsenic) equaled or exceeded its respective Arizona Residential SRL.

For the 10 shallow soil samples tested for REC-2, toxaphene was detected in two samples at concentrations of 0.12 mg/kg and 0.29 mg/kg. Both concentrations are well below the Non-Residential SRL for toxaphene (16 mg/kg). No other pesticide compounds were detected in samples for REC-2.

For the 10 shallow soil samples tested for REC-3, arsenic concentrations equaled or exceeded the Non-Residential SRL (10 mg/kg) in every sample, with concentrations ranging from 10 mg/kg to 36 mg/kg. A PCB, arochlor, was detected in one sample at a concentration of 0.24 mg/kg, well below the high-risk Non-Residential SRL value of 7.4 mg/kg. A total of 10 SVOCs were detected in one sample, all of which are characterized as polycyclic aromatic hydrocarbons. All concentrations were below their respective Non-Residential SRLs.

Based on the analysis of sampling data, the study concluded that except for arsenic, which is believed to be naturally occurring, no other contaminants equaled or exceeded Non-Residential SRLs. Therefore, based on the results of the Phase II Environmental Site Assessment for the Alternative 2 Expansion Area, no further action is required.

**Alternative 3 Expansion Area.** This expansion area directly to the east of the RHC LPOE, across Customs Avenue, includes seven parcels between 1<sup>st</sup> Street and International Avenue. As described in Section 3.4.1.3, the seven parcels are currently occupied by approximately 13 buildings including one active commercial shuttle service, three occupied residential domiciles, and several commercial buildings, some of which are vacant, some being used for storage, and others in various stages of deterioration. Besides the conditions described for the existing RHC LPOE, the age of infrastructure and utilities in the Alternative 3 Expansion Area raises concerns for health and safety. There is a collapsing building and unkept, old infrastructure in buildings located on the property, which would dictate the need for safety precautions to inspect and demolish these buildings. Also, the presence of hazardous materials, waste tires, automotive waste (including broken down cars), and other waste materials in buildings on the site would require a significant effort for removal, characterization, and proper disposal and management.

**Nearby Facilities of Concern.** The former site of the Calumet & Arizona Company and Phelps Dodge Corporation Reduction Works (former Phelps Dodge smelter site) copper smelting facility is located approximately 0.7 mile west of the existing RHC LPOE and 3.5 miles east of the proposed Commercial LPOE. The site formerly supported a 2,000-acre copper smelting operation. A large pile of slag, or solid wastes from processing copper ore, currently occupies approximately 200 acres. Two copper smelters operated from 1904 to 1931 and 1931 to 1987, respectively. During the smelting process, metal ores were heated, which produced molten metals and released SO<sub>2</sub> and particulate matter through two 600-foot stacks. Between 1970 and 1987, ADEQ and USEPA periodically monitored offsite ambient air for concentrations of hazardous substances. Prevailing winds generally blew toward the south and north-northeast. The smelter had a history of stack emission rates for particulate matter and SO<sub>2</sub> exceeding USEPA NAAQS, which led

to closure of the smelter in 1987. The smelter facilities were demolished in January 1990; two large slag piles and three closed landfills remain on the property. Two of the closed landfills were historical dumping areas that are now covered in soil, and the third was a municipal landfill that is now closed. The landfill areas were all leased by Phelps Dodge to the City of Douglas under the condition the city managed closure and monitoring of the landfill sites (URS Greiner 1997). The total landfill area is approximately 60 acres, located to the northeast of the slag piles (US DHHS 1995). In response to concerns raised during scoping, GSA conducted extensive background research into the potential for this site to have caused contamination within the GSA project areas as summarized below.

An Extraction Procedure Toxicity (EP Tox) analyses was conducted on the slag piles in 1979. The report indicated the piles are considered inert, are not susceptible to aerial migration, their potential for leaching is low, and based on results are not a RCRA hazardous material (URS Consultants 1994).

In 1985 the Arizona Department of Health Services collected 52 surface samples at undisclosed offsite locations from the former Phelps Dodge smelter site throughout a widespread area in the City of Douglas to evaluate background lead concentrations in the area. Lead concentrations in the samples ranged from 50 to 1,170 milligrams per kilogram (mg/kg), with an average lead concentration of 254 mg/kg. The Agency for Toxic Substances and Disease Registry (ATSDR) also reported offsite maximum and mean background arsenic concentrations of 35.8 and 15 mg/kg, respectively, for surface samples collected at distances between 1 and 6 miles from the smelter site; all samples exceeded the residential regional screening level (RSL) (Jacobs 2020). The results of these sampling events were later published in a 1993 ATSDR Public Health Assessment Report.

Due to the preliminary findings of contamination identified in the ATSDR's 1993 Public Health Assessment Report, the USEPA determined that further characterization of the former smelter site and the areas between the site and the City of Douglas was necessary. Therefore, an expanded site inspection and remedial investigation led by the USEPA was conducted on the site and the findings of the report were presented in a 1997 USEPA expanded investigation report prepared by URS Greiner. During the expanded investigation effort, 512 surface soil samples were collected for analysis for lead (via x-ray fluorescence) and inorganic contaminants (via fixed laboratory) in February of 1995. The sampling locations included areas on-site at the former smelter site and off-site within the surrounding communities. Sampling included a transect of samples collected every 200 feet within the area between the former smelter site and the RHC LPOE expansion areas, as well as along Pan American Avenue. Additionally, supplemental step-out surface soil sampling was conducted in February 1996. A conservative version (800 mg/kg) of the established 1,000 mg/kg industrial limit was recommended for use by the USEPA for the supplemental step-out samples located on-site. Step-out sampling was done at transect points that exceeded a concentration of 800 mg/kg on-site or 400 mg/kg within the residential communities. Step-out samples consisted of 50-foot interval sampling locations along, and perpendicular to, the transect to further investigate the presence of potential local contamination or determine if larger areas of contamination existed. Sampling results indicated that 78 samples collected from the former smelter site exceeded a 400 mg/kg residential limit on the x-ray fluorescence. In addition, 8 of the 78 samples exceeded the step-out sampling criteria of 800 mg/kg, and 3 samples (all located onsite at the former smelter site) exceeded the 1,000 mg/kg industrial limit for lead. Those 3 samples were collected from the northeastern portion of the former smelter site (URS Greiner 1997).

Of the samples collected from the surrounding community, none that exceeded the criteria limits discussed above were located within the RHC LPOE expansion areas. The results of the x-ray fluorescence lead testing indicate the former smelter site probably contributed to on-site concentrations above background levels of lead in the soil; however, the investigation did not identify consistent concentrations of lead contamination above 800 mg/kg in on-site soils. Additionally, the investigation found there was no discernable variation in lead concentrations corresponding with proximity to/distance from the former smelter site. Therefore, the expanded investigation report concluded at the time that, because the entire site has remained vacant and there are only a few known isolated areas of lead contamination remaining at the

time, the former smelter site did not appear to be a threat to human health or the environment with respect to lead contamination (URS Greiner 1997). Note that this statement was made in reference to the Phelps Dodge smelter site itself and does not directly apply to the project areas under consideration in this Proposed Action.

Concentrations of inorganic contaminants were also identified in the soil above background sample concentrations; however, most of the results did not exceed the Arizona Health-Based Guidelines for soil ingestion. Some residential Health-Based Guidelines were exceeded within the community; however, results were generally below the USEPA's guidelines for residential and industrial areas (URS Greiner 1997).

At the request of ADEQ and the community, five surface samples were also collected for radionuclide testing and analysis. All samples were analyzed for gross alpha and gross beta activity. Results of the radionuclide testing indicated that the gross alpha results from the on-site samples were elevated compared to the background sample, but all gross alpha results were below the USEPA soil ingestion benchmarks of 13 pCi/g, 17 pCi/g, and 18 pCi/g listed for the three naturally occurring uranium isotopes  $U^{238}$ ,  $U^{235}$ , and  $U^{234}$ , respectively. The highest gross alpha sample was collected from the slag pile, at 9.2 pCi/g as compared to the background sample of 2.7 pCi/g. In addition, the radionuclide testing results indicated that gross beta activities were greater than the ingestion benchmarks but similar (ranging from 23 pCi/g to 27 pCi/g), or in one case (the slag pile sample of 20 pCi/g), less than the background results (21 pCi/g), indicating the source of gross beta activity is naturally occurring and therefore not directly attributed to the former smelter site. The sum of the alpha and beta gross activities was greater than the soil ingestion benchmarks in all cases due to the high gross beta activity; however, it should be noted that the summed activities for the on-site samples were not substantially higher than that of the background samples, indicating the magnitude of contribution from naturally occurring sources (URS Greiner 1997).

Groundwater samples were also collected from around the site, as well as from upgradient off-site locations, to be used for comparison. Inorganic groundwater sample results did not exceed any maximum contaminant levels or up to three times the upgradient sample results. Some groundwater samples were also collected for radionuclide analysis. The samples collected included an upgradient off-site location (HP-01) and a downgradient location east of the slag piles (HP-09). The results from HP-01 were elevated by more than two orders of magnitude in comparison to the downgradient sample (HP-09). These results indicate an elevated regional presence of radionuclides in the shallow groundwater. Sample HP-01 was collected at a depth of 20 feet bgs, and sample HP-09 was collected at a depth of 75 feet bgs. HP-09 represents the shallow aquifer, while HP-01 represents the perched groundwater table; therefore, the results are not directly comparable. However, the report concludes that based on the limited scope of the radiological assessment, the deeper groundwater does not appear to be impacted. Further, the fact that gross alpha and beta levels were higher in the off-site, upgradient sample location, radionuclide contamination does not appear to be attributed to former smelter site activities. The report goes on to state that because of the extremely elevated concentrations of the upgradient radionuclide samples, an additional investigation of the radionuclide contamination should be conducted by the off-site responsible party. The Phelps Dodge Reduction Works (i.e., the former smelter site owner) used results from the 1997 USEPA expanded investigation to apply for a clean closure permit in place of an aquifer protection permit.

According to the USEPA Superfund Site online database, the former Phelps Dodge smelter site does not qualify for the National Priorities List (USEPA 2022). Further, the site is not listed within the ADEQ VRP online database (ADEQ 2022g).

Scoping commenters provided comments which indicated the former smelter site boundaries extend to directly adjacent to the Alternative 2 Expansion Area. A review of historic records provided by ADEQ indicated that during a 1994 site investigation report, USEPA considered the property to the east of the former smelter site to be a part of the former Phelps Dodge smelter site. This property area has historically been occupied by the closed landfills, and in the late 1800s, by an old Copper Queen Smelter that closed



once the former Phelps Dodge smelter site became the main facility operation in 1931. However, Phelps Dodge considered the old Copper Queen site to be a separate facility (URS Consultants 1994). Based on a review of Chain-of-Title records for the Alternative 2 Expansion Area parcels back to 1980, neighboring properties to the west of the RHC LPOE expansion areas were not owned by Phelps Dodge at any point. Additionally, based on a review of historical aerial photographs back to 1958, there was no type of development or mining activities adjacent to the west of the Alternative 2 Expansion Area. Therefore, for the purposes of the Proposed Action analysis, the nearest environmental and human health concerns of the former Phelps Dodge smelter site are identified to be located at the slag pits located approximately 0.7 mile west of the Alternative 2 Expansion Area westernmost boundary.

During the Phase I Environmental Site Assessment conducted in May 2023, a former drycleaner was identified approximately 0.4 miles upgradient to the east of the Alternative 3 Expansion Area. Drycleaners typically use hazardous solvents, such as trichloroethene in their operations, which can degrade into similarly toxic compounds such as dichloroethane and vinyl chloride. The historic detection of trichloroethene in the soil and groundwater of the RHC LPOE (located west of the Alternative 3 Expansion Area) could be associated with releases from the former drycleaner. The drycleaner is no longer in operation and the RHC LPOE site, where detection was discovered, has since been remediated and received an NFA determination from ADEQ. However, the location of the Alternative 3 Expansion Area, between the former drycleaner (upgradient to the east) and the RHC LPOE (directly west), would put the property in the direct path of contamination exposure if the trichloroethene found at the RHC LPOE originated from the drycleaner. There is no evidence that any of the parcels in the Alternative 3 Expansion Area have been investigated or tested for contamination (GSA 2023a).

**Lead-Based Paint and Asbestos-Containing Material.** The RHC LPOE contains two structures that have been listed on the National Register of Historic Places (NRHP), the Main Building and Garage, both of which were constructed in 1933 and have a confirmed presence of LBP and ACM. Additionally, while not confirmed, there is a possible presence of LBP and ACM in the duty-free shop building to be acquired within the expansion area considered in Alternative 1 due to its age of construction.

An LBP survey of the Main Building and the Garage was completed in August 2022 (ACT Environmental, Inc. 2022). LBP was found in the Garage and in the basement, first, and second floors of the Main Building. Approximately 20 square feet of damaged LBP were identified during the survey, including 19 square feet within the Main Building and 1 square foot within the Garage. LBP that is in intact condition includes paint with no damage or deterioration and is not classified as a lead hazard. Damaged or deteriorated (peeling) LBP represents a lead hazard, as defined by USEPA.

Areas of known ACM are periodically inspected per GSA regulations. An internal GSA inspection of ACM in the Main Building was conducted in April 2019. Specifically, the ACM included 1-foot by 1-foot perforated ceiling tiles in the basement, first, and second floors, as well as pipe insulation found on the heating, ventilation, and air conditioning (HVAC) and water lines in the walls between the first and second floors. The latter had been partially abated in the basement. ACM represents a health hazard when friable asbestos becomes damaged and the fibers are inhaled. ACM that is undamaged, undisturbed, or encapsulated is not considered a health hazard.

The potential presence of ACM and LBP throughout the interior of the buildings in the Alternative 1 and Alternative 3 Expansion Areas is high due to their age (GSA 2022b, GSA 2023a).

**Pesticides.** GSA has identified a large beetle population at the RHC LPOE. To combat the problem, in accordance with FIFRA, two insecticides are sprayed throughout the site on a regular basis. This includes a monthly application of the pesticide Barricor SP and a weekly application of Suspend SC. The potential for shallow soil contamination resulting from years of pesticide application exists for the RHC LPOE; however, due to the developed nature of the site and impervious paved surfaces, it is likely the pesticides are washed off-site by stormwater run-off.

**Security and Law Enforcement.** The Douglas Police Department is located approximately 1.2 miles north of the RHC LPOE and is the primary provider of law enforcement and police protection services in the area. In addition, the Bisbee Police Department is located approximately 22.7 miles to the west-northwest of the RHC LPOE, and Cochise County Sheriff's Office is located approximately 22.4 miles to the west-northwest, both in Bisbee, Arizona.

**Emergency Services.** The Copper Queen Community Hospital Emergency Department in Douglas, Arizona is located approximately 0.5 mile north of the existing RHC LPOE. This facility is housed in the Copper Queen Community Hospital – Douglas Medical Complex, which also provides a primary care clinic, urgent care capabilities, coumadin clinic, laboratory, surgery clinic, and physical therapy services. Copper Queen Community Hospital has an additional Emergency Department located in Bisbee, Arizona, located approximately 23.5 miles west-northwest of the RHC LPOE (Copper Queen Community Hospital 2022b).

Fire protection services are provided by the Douglas Fire Department, located in Douglas, approximately 1.9 miles northeast of the existing RHC LPOE. For any incidents occurring on LPOE property that involve spills of hazardous materials, CBP standard procedures include securing the spill, isolation, and immediate notification of the appropriate responding agency (i.e., the Douglas Fire Department). The Fire Department protocol is to contact regional authorities in the event an incident is beyond their scope or ability to respond (Robles 2023).

### 3.13.2 Environmental Consequences

#### 3.13.2.1 Methodology

To evaluate impacts on human health and safety, GSA reviewed the project alternatives to determine whether any activities have the potential to cause the following within the ROI:

- Adverse impacts on public or occupational health and safety;
- New sources of construction materials and operational supplies to be developed;
- Create the need for a hazardous waste treatment, storage, or disposal permit for the project;
- Create reasonably foreseeable conditions that would increase the risk of a hazardous materials or hazardous waste release; or
- Affect the capacity of waste collection services and treatment, storage, and disposal facilities.

A significant adverse impact to human health and safety would occur if the Proposed Action would result in:

- Conflict with any federal, state, or local laws, regulations, or ordinances relating to public health and safety, including occupational safety and health;
- An unacceptable increased risk of adverse impacts to human health;
- Violations of applicable federal, state, or local standards related to the management of hazardous materials or wastes; or
- Increase in the use of hazardous materials or generation of hazardous wastes to such an extent that would lead to an elevated risk of human health or environmental effects.

The potential impacts of the Proposed Action and its alternatives on occupational health and safety relate directly to the size of the workforce needed for operation and maintenance activities. Workers at any facility are subject to risks of injuries and fatalities from physical hazards. Such risks include exposure to extreme weather conditions, hazardous equipment, and large moving vehicles. This EIS estimates the potential occupational safety and health impacts of construction of the Proposed Action and its alternatives using data collected by the Bureau of Labor Statistics based on the North American Industry Classification System (NAICS). NAICS Codes 2362 (construction of nonresidential buildings) and 2373 (highway, street, and bridge construction) were used to predict the probability of the workforce to experience recordable

injuries, illnesses, lost workdays, or fatalities during the construction phase of the Proposed Action and its alternatives.

### 3.13.2.2 No Action Alternative

Under the No Action Alternative, GSA would not construct a new Commercial LPOE nor expand and modernize the RHC LPOE. Therefore, negligible impacts would occur since there would be no change in risks to human safety, hazardous materials usage, or waste generation. Ongoing maintenance to the RHC LPOE would continue, which would require negligible amounts of hazardous materials usage and generate negligible amounts of hazardous waste. Risks to health and safety associated with existing conditions and operations at the RHC LPOE would remain unchanged from current conditions. The processing of COVs would be retained at the existing RHC LPOE. COVs would continue to drive through the City of Douglas while carrying potentially hazardous materials or transporting heavy mining equipment.

### 3.13.2.3 Alternative 1 – Sequential Construction

During construction of Alternative 1, there would be short-term, negligible adverse impacts to worker safety from construction activities, and short-term, negligible to minor adverse impacts from hazardous materials and waste handling at both the proposed Commercial LPOE and RHC LPOE.

Operations of Alternative 1 would result in long-term, negligible adverse effects on human health and safety and from hazardous materials and waste handling at the proposed Commercial LPOE. At the RHC LPOE, there would be long-term, minor to moderate beneficial impacts on human health and safety.

## Construction

### Commercial LPOE

Table 3.13-1 summarizes Bureau of Labor Statistics data for occupational injuries and fatalities in the construction industry, specifically NAICS Codes 2362 (construction of nonresidential buildings) and 2373 (highway, street, and bridge construction). These data summarize the incidence rate for injury or illness cases per 100 worker-years (or 200,000 hours) for total recordable cases and cases involving lost workdays. The table also lists the total number of fatalities in each industry by year.

**Table 3.13-1. Occupational Injuries and Fatalities for Relevant Construction Industries (2014 – 2020)**

Year	Average Employment (thousands)		Total Recordable Injury or Illness Cases (rate per 100 workers)		Cases with Days Away from Work, Transfer, or Restriction (rate per 100 workers)		Total Fatal Injuries in Industry	
	2362 <sup>a</sup>	2373 <sup>b</sup>	2362 <sup>a</sup>	2373 <sup>b</sup>	2362 <sup>a</sup>	2373 <sup>b</sup>	2362 <sup>a</sup>	2373 <sup>b</sup>
2014	698.4	294.4	2.7	3.8	1.4	2.3	69	94
2015	730.3	309.7	2.4	3.6	1.3	2.2	62	108
2016	762.3	319.3	2.4	3.5	1.3	2.3	50	107
2017	792.5	327.7	2.7	3.2	1.4	1.9	56	104
2018	827.1	341.2	2.5	3.6	1.4	2.0	71	100
2019	840.9	348.6	1.9	3.4	1.1	2.0	69	104
2020	797.7	346.0	1.8	2.7	1.0	1.6	58	105
<b>Average</b>	<b>778.4</b>	<b>326.7</b>	<b>2.3</b>	<b>3.4</b>	<b>1.3</b>	<b>2.0</b>	<b>62.1</b>	<b>103.1</b>

Source: U.S. Bureau of Labor Statistics 2022

<sup>a</sup> NAICS Code 2362 is the industry code for construction of nonresidential buildings.

<sup>b</sup> NAICS Code 2373 is the industry code for construction of highways, streets, and bridges.

The average annual number of fatal injuries for workers in the nonresidential building construction industry is approximately 62, based on the years from 2014 to 2020, for an average workforce of approximately 778,000 employees. The average probability of a fatal injury during the period was approximately 0.00008 per worker per year (less than 1 in 10,000). The average annual number of fatal injuries for workers in the highway, street, and bridge construction industry is approximately 103, based on the years from 2014 to 2020, for an average workforce of approximately 327,000 employees. The average probability of a fatal injury during the period was approximately 0.0003 per worker per year (less than 1 in 1,000). During peak construction activity under Alternative 1, it is assumed that up to 100 construction workers could be onsite simultaneously. While peak activity would not last the duration of the 48- to 54-month construction period anticipated under Alternative 1, a conservative estimate would still expect no fatalities to occur over the course of construction (projected maximum of 0.135 fatality to occur over the 4.5-year total construction period).

Under Alternative 1, risks to health and safety of personnel and patrons would increase slightly during the construction phase. Risks would be minimized by adhering to occupational safety and health regulations, the use of protective gear and equipment, and the implementation of BMPs. Access to the construction site would be restricted to construction workers. Risks to human health and safety during construction under Alternative 1 would therefore be short-term, negligible to minor, and adverse.

Alternative 1 would result in short-term, negligible to minor adverse impacts from hazardous materials and waste handling during construction of the proposed Commercial LPOE. Hazardous materials associated with construction would be used in accordance with federal, state, and local regulations. All wastes including hazardous waste, construction debris, and other waste materials would be removed from all project areas and disposed of in accordance with applicable regulations. Landfilled waste would be disposed of at permitted landfills with adequate capacity. The increased amounts of hazardous materials such as diesel fuel, gasoline, paint, adhesives, and solvents used onsite during construction could increase the potential for spills. Any spills from construction activities would be immediately contained and disposed of properly in accordance with all applicable plans and regulations. In addition, any project-specific hazards affecting workers would be reduced based on strict adherence to OSHA standards and other relevant safety laws, rules, and regulations. Therefore, there would be a low likelihood of hazardous material spills or associated human health impacts as a result of hazardous materials or waste handling during construction activities.

As determined by the Phase II Environmental Assessment (GSA 2023b), any soil removed from the proposed Commercial LPOE site during construction may require special handling and disposal based upon the arsenic concentrations observed. While none of the soil at the property would be considered hazardous waste under USEPA regulations, nor hazardous or special waste under ADEQ regulations, there may be limits on where the soil goes if removed from the property. Because the arsenic concentrations exceed both the Residential and Non-Residential SRL, it is likely the soil will need to be sent to a Municipal Solid Waste Landfill (MSWL). During construction, the construction contractor, in coordination with GSA, would identify which facility(ies) can accept the soil. It is possible that the MSWL or other destination receiving the soil may require additional testing and analysis of the soil prior to receipt.

### **RHC LPOE**

Potential impacts to human health and safety during the construction phase at RHC LPOE under Alternative 1 would be negligible. Potential impacts to worker safety during construction at RHC LPOE would be similar to as described for the Commercial LPOE as there would be similar amounts of workers on site, although for a shorter construction period (36 to 42 months). Risks to health and safety of personnel and patrons would increase slightly during the construction phase but would be minimized by adhering to occupational safety and health regulations, the use of protective gear and equipment, and the implementation of BMPs, similar to as described for the Commercial LPOE. In addition, access to the construction site would be restricted to construction workers and applicable CBP personnel.

There would be temporary, negligible to minor adverse impacts from hazardous materials and waste handling during expansion and modernization of the new RHC LPOE facilities, similar to those described for the proposed Commercial LPOE. Hazardous materials associated with construction and potentially contaminated soils encountered during excavation would be handled in accordance with federal, state, and local regulations as described for the proposed Commercial LPOE to prevent, minimize, and control hazardous materials and exposure during construction activities.

All locations potentially containing LBP would be evaluated before starting construction activities to determine if any abatement measures would be required. For all ACMs, a licensed abatement contractor would be retained to remove and properly dispose of ACMs prior to commencing construction operations. Additionally, any transformers that need to be disturbed or moved would be sampled for polychlorinated biphenyl (PCB) content. If PCBs are present, appropriate abatement actions for their disposal would be implemented in accordance with regulatory requirements, and soil beneath transformers would be evaluated for evidence of releases. Demolition would be conducted in accordance with all appropriate federal NESHAPS related to asbestos (see Section 3.3, Air Quality and Greenhouse Gas Emissions).

During the Phase II Environmental Site Assessment (GSA 2023c), soil samples were collected in the Alternative 2 Expansion Area to investigate potential contamination concerns with the former Phelps Dodge smelter site, as well as other potential spills and releases that may have occurred in the Alternative 2 Expansion Area. No soil samples were collected in the Alternative 1 Expansion Area as no specific RECs were identified in the area, the area primarily consists of impervious surface, and undeveloped areas are associated with an active city park. However, as the Alternative 2 Expansion Area is located closer to the former Phelps Dodge smelter site, and because it is only approximately 400 feet from the Alternative 1 Expansion Area, soil sampling results in this area are assumed to be generally comparable for the Alternative 1 Expansion Area. Therefore, any soil removed from the Alternative 1 Expansion Area during construction may require special handling and disposal based upon the arsenic concentrations observed, as described in Section 3.13.2.4.

Additional types of hazardous or otherwise regulated waste materials could also be generated during demolition activities. These include, but are not limited to, items such as fluorescent, halide, or sodium vapor lamps containing mercury; smoke detectors and emergency exit signs containing low-level radioactive sources; mercury switches; electronic ballasts containing PCBs and/or other fluids; and various equipment containing batteries. Such wastes would be disposed in accordance with federal, state, and local regulations. Landfilled waste would be disposed of at permitted landfills with adequate capacity.

## **Operations**

### ***Commercial LPOE***

There would be long-term, negligible adverse effects on human health and safety during operations of the proposed Commercial LPOE. Operations would be conducted in accordance with applicable building and safety codes. Employees would adhere to fire safety standards set forth in the Fire Protection Code and Life Safety Code 101 of the National Fire Protection Association codes and Uniform Fire Code (Douglas Code of Ordinances Title 8, Chapter 8.08, Fire Prevention Code).

There would be long-term, negligible adverse impacts related to hazardous materials and waste handling from operations of the proposed Commercial LPOE. The new facility would not include any ACMs or LBP that could result in occupant exposure, or any PCB-containing electrical equipment. There may be petroleum storage tanks associated with the new facility; these would be installed and operated in accordance with all applicable regulations and current industry standards including leak-detection systems and secondary containment. Hazardous materials such as paints and cleaners would be used in facility maintenance activities, but these would likely be in small amounts. Small amounts of hazardous waste may also be generated periodically from facility maintenance activities and would be managed in accordance with applicable regulations.

The addition of COV processing and an indoor firing range would result an increase in handling of hazardous waste and materials. COVs that previously traveled through the RHC LPOE would be regularly transporting heavy mining machinery and hazardous materials and waste through the proposed Commercial LPOE, and the indoor firing range would generate potentially hazardous munitions waste. However, adherence to federal, state, and local regulations would minimize the potential for any long-term exposure or release of hazardous waste or materials to the environment.

### **RHC LPOE**

Long-term, minor to moderate beneficial impacts on human health and safety of CBP personnel and the public would be expected from modernizing the RHC LPOE. The current layout of the RHC LPOE requires pedestrians to cross several lanes of vehicle traffic, and the volume of commercial traffic through the City of Douglas presents safety and traffic hazards resulting from vehicle accidents or accidental releases of hazardous materials potentially carried by COVs. Under Alternative 1, the RHC LPOE would be expanded and redeveloped with modernized facilities meeting all applicable building codes and improved pedestrian access. Commercial traffic, and the potentially hazardous materials or heavy mining equipment being transported by COVs, would be rerouted away from the downtown streets of the City of Douglas. The operations of the RHC LPOE would also improve, reducing traffic jams and minimizing the risk of vehicular and pedestrian accidents.

There would be negligible adverse impacts related to the handling of hazardous materials and wastes from operations of the new RHC LPOE. The new facility would not include any ACMs or LBP that could result in occupant exposure. Hazardous materials such as paints and cleaners would be used in facility maintenance activities, but these would likely be in small amounts. Small amounts of hazardous waste may also be generated periodically from facility maintenance activities and would be managed in accordance with applicable regulations.

### **Alternatives 1a – 1d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 1a through 1d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.1.2.1. As these sub-alternatives would take place within the footprint of the RHC LPOE, the potential impacts from hazardous waste and materials as already identified under Alternative 1 would not change.

ACM, LBP, and other potential hazardous materials (e.g., PCB window caulk, fluorescent light tubes, PCB-containing electrical equipment) in the Main Building and the Garage would be removed prior to construction activities. Therefore, short-term, minor adverse impacts would be expected from the potential adverse effects on human health and safety. However, effects would be minimized by ensuring that OSHA standards are followed in the disturbance, removal, and transportation of ACM, LBP, and other materials. Long-term, minor beneficial impacts on the health and safety of CBP personnel and pedestrians entering the U.S. through the RHC LPOE would be expected from the removal of ACM and LBP from the Main Building, which currently houses the pedestrian inspection area.

### **3.13.2.4 Alternative 2 – Concurrent Construction (Westward Expansion)**

During construction of Alternative 2, there would be short-term, negligible adverse impacts to worker safety from construction activities, and short-term, negligible to minor adverse impacts from hazardous materials and waste handling at the proposed Commercial LPOE. Impacts at the RHC LPOE would be similar to Alternative 1 but would be short-term, minor, and adverse from hazardous materials and waste handling.

Operations of Alternative 2 would result in long-term, negligible adverse effects on human health and safety and from hazardous materials and waste handling at the proposed Commercial LPOE. At the RHC LPOE, there would be long-term, minor to moderate beneficial impacts on human health and safety.

## **Construction**

Under Alternative 2, concurrent construction at the RHC LPOE and the proposed Commercial LPOE site would result in similar impacts to human health and safety as described for Alternative 1 for both the Commercial LPOE and RHC LPOE but would be slightly more adverse. The concurrent construction activities would increase the number of construction workers working at the same time and COVs would remain onsite for processing during construction at the RHC LPOE, thus resulting in a higher risk for traffic-related accidents. The increased maximum number of workers at a given time (approximately 200 workers) and the decrease in overall construction time (approximately 36 to 42 months shorter) would result in the potential for up to approximately 0.21 fatality during the construction phase of Alternative 2. No construction-related fatalities would be expected, although the risk would negligibly increase over the rate of fatalities calculated for Alternative 1.

There would be short-term, minor adverse impacts related to hazardous materials and wastes handling during construction of Alternative 2, similar to as described for Alternative 1. The Alternative 2 Expansion Area at the RHC LPOE encompasses a larger land area than the Alternative 1 Expansion Area (up to 13.9-acre difference) and primarily includes undeveloped, open land area. The Alternative 2 Expansion Area represents the maximum build-out that GSA would consider. As determined by the Phase II Environmental Assessment (GSA 2023c), any soil removed from the proposed Alternative 2 Expansion Area during construction may require special handling and disposal based upon the arsenic concentrations observed. While none of the soil at the property would be considered hazardous waste under USEPA regulations, nor hazardous or special waste under ADEQ regulations, there may be limits on where the soil goes if removed from the property. Because the arsenic concentrations exceed both the Residential and Non-Residential SRL, it is likely the soil would need to be sent to a MSWL. During construction, the construction contractor, in coordination with GSA, would identify which facility(ies) can accept the soil. It is possible that the MSWL or other destination receiving the soil may require additional testing and analysis of the soil prior to receipt.

Soil and materials from the debris piles onsite would likely be required to be sent to a Non-Municipal Solid Waste Landfill (Non-MSWL). Non-MSWLs include facilities commonly known as construction and demolition debris landfills. The construction contractor would be responsible for providing information from the Phase II Environmental Site Assessment about the debris pile to the final receiving destination (e.g., Non-MSWL).

## **Operations**

Impacts during operations of the Commercial LPOE and RHC LPOE under Alternative 2 would be the same as described for Alternative 1.

## **Alternatives 2a – 2d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 2a through 2d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.2.1. Under Alternatives 2a through 2d, impacts to health and safety would be similar to those described under Alternatives 1a through 1d.

### **3.13.2.5 *Alternative 3 – Concurrent Construction (Eastward Expansion)***

During construction of Alternative 3, there would be short-term, negligible adverse impacts to worker safety from construction activities, and short-term, negligible to minor adverse impacts from hazardous materials and waste handling at the proposed Commercial LPOE. Impacts at the RHC LPOE would be similar to Alternative 1 but would be short-term, minor, and adverse from hazardous materials and waste handling.

Operations of Alternative 3 would result in long-term, negligible adverse effects on human health and safety and from hazardous materials and waste handling at the proposed Commercial LPOE. At the RHC LPOE, there would be long-term, minor to moderate beneficial impacts on human health and safety.

## **Construction**

Under Alternative 3, concurrent construction at the RHC LPOE and the proposed Commercial LPOE site would have the same impacts as Alternative 2 with respect to worker safety and traffic-related accidents.

There would be short-term, minor adverse impacts related to hazardous materials and wastes handling during construction of Alternative 3, similar to as described for Alternative 1. The Alternative 3 Expansion Area at the RHC LPOE encompasses a larger land area than the Alternative 1 Expansion Area (up to 4.4-acre difference). Alternative 3 would also require the demolition and removal of approximately 13 buildings and structures east of Customs Avenue, including one active business, three occupied residential domiciles, and several commercial buildings, some of which are vacant, some being used for storage, and others in various stages of deterioration. The potential presence of ACM and LBP throughout the interior of the buildings is high due to their age. Also, the presence of hazardous materials, waste tires, automotive waste (including broken down cars), and other waste materials in buildings on the site would require a substantial effort for removal, characterization, and proper disposal and management. The disposal of hazardous materials would result in the generation of hazardous waste, for which GSA may need to obtain a USEPA Identification Number if more than 100 pounds of hazardous waste is generated.

The potential to encounter contaminated soils and groundwater during excavation activities may be greater than under Alternative 1. During the Phase II Environmental Site Assessment (GSA 2023c), soil samples were collected in the Alternative 2 Expansion Area to investigate potential contamination concerns with the former Phelps Dodge smelter site, as well as other potential spills and releases that may have occurred in the Alternative 2 Expansion Area. No soil samples were collected in the Alternative 3 Expansion Area, however, as the Alternative 2 Expansion Area is located closer to the former Phelps Dodge smelter site, and because it is only approximately 700 feet from the Alternative 3 Expansion Area, soil sampling results in this area are assumed to be generally comparable for the Alternative 3 Expansion Area. Therefore, any soil removed from the Alternative 3 Expansion Area during construction may require special handling and disposal based upon the arsenic concentrations observed, as described in Section 3.13.2.4.

In addition, if this Alternative is selected, GSA would conduct further investigations (e.g., soil gas analysis) prior to construction for presence of VOC concerns associated with trichloroethene and its degradation products as a result of potential groundwater contamination from the former drycleaner. Also, because of site development dating back to the 1960s, a ground penetrating radar (GPR) and Electro Magnetic survey would be conducted on the Alternative 3 Expansion Area to further identify for the presence of any USTs at the site prior to construction. If contaminated soil is present, appropriate abatement, management or disposal actions would be implemented in accordance with applicable regulatory requirements to prevent, minimize, and control hazardous materials, if necessary, during construction. If VOC contamination is present, air monitoring would be conducted during construction activities to evaluate the potential for harmful vapors which could present a health and safety concern to onsite construction workers. GSA would also evaluate the need to install any vapor barriers underneath the new facilities.

## **Operations**

Impacts during operations of the Commercial LPOE and RHC LPOE under Alternative 3 would be the same as described for Alternative 1.

### **Alternatives 3a – 3d: Reuse, Relocate, or Demolish Historic Structures**

Alternatives 3a through 3d relate to the sub-alternatives for the management of the historic Main Building and Garage, as described in Section 2.2.1. Under Alternatives 3a through 3d, impacts to health and safety would be similar to those described under Alternatives 1a through 1d.

#### **3.13.2.6 *Impact Reduction Measures***

Measures that would limit impacts related to human health and safety during building construction and operations are discussed below.



- If PCB-containing materials are identified onsite, appropriate abatement actions for their disposal would be implemented in accordance with regulatory requirements, and soil beneath transformers would be evaluated for evidence of releases. If present in underlying soils, appropriate abatement actions for removal and disposal would be implemented in accordance with applicable regulatory requirements.
- All spills or releases of POLs; hazardous materials; pollutants; or contaminants would be handled in accordance with measures outlined in a Spill Prevention and Response Plan prepared for construction.
- As a BMP, a Soil Management Plan may be prepared to address the potential for encountering areas of environmental concern (e.g., contaminated soil) during grading, excavation, or other subsurface disturbance. The Soil Management Plan would identify specific measures to address hazardous waste and materials cleanup efforts including monitoring, handling, stockpiling, characterization, on-site reuse, export and disposal protocols for excavated soil.
- All personnel would follow standard operating procedures for hazardous material handling.
- All potentially hazardous wastes generated would be properly characterized, segregated, and managed onsite prior to offsite disposal.
- Any existing municipal (household) trash, construction debris, and other waste materials, including waste soils, would be removed from all project areas and disposed of in accordance with applicable regulations.
- Potentially hazardous wastes generated during project-related construction activities would be disposed of or recycled at appropriate facilities in accordance with associated regulatory requirements.
- A USEPA Identification Number would be obtained if more than 100 pounds of hazardous waste is generated under any alternative.
- If Alternative 3 is selected, GSA would consider the need to conduct further investigations within the Alternative 3 Expansion Area related to VOCs associated groundwater contamination underlying the parcel.
- If Alternative 3 is selected, GSA would consider the need to conduct a GPR and Electro Magnetic survey within the Alternative 3 Expansion Area to further identify for the presence of any USTs at the site prior to construction.
- Construction workers would adhere to safety standards promulgated in 29 CFR Chapter 17 to protect against workplace hazards. To minimize potential exposure or safety concerns to workers, appropriate personal protective equipment would be worn.

## CHAPTER 4 CUMULATIVE IMPACTS

### 4.1 INTRODUCTION

Cumulative impacts are defined by the CEQ regulations in 40 CFR 1508.1(g)(3) as “effects, which are effects 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.”

Cumulative impacts can result from individually minor, but collectively substantial impacts taking place over a period of time. Cumulative impacts on resources in the project area may result from the impacts of the project together with other past, present, and reasonably foreseeable projects, such as residential, commercial, industrial, and other development. These land use activities may result in cumulative effects on a variety of natural resources, such as species and their habitats, water resources, and air quality. They also can contribute to cumulative impacts on the urban environment, such as changes in community character, traffic patterns, noise, housing availability, and employment. According to CEQ’s cumulative impacts guidance, the cumulative impact analysis should be narrowed to focus on important issues at a national, regional, or local level.

### 4.2 PAST, PRESENT, AND REASONABLY FORESEEABLE FUTURE ACTIONS

The cumulative effects analysis presented in this EIS is based on the potential effects (direct and indirect) resulting from the construction of a new Commercial LPOE and the expansion and modernization of the existing RHC LPOE (as described in Chapters 1 through 3), combined with other past, present, and reasonably foreseeable future actions that could have effects in the project area. Because the operating conditions of Alternative 1 (sequential construction) and Alternatives 2 and 3 (concurrent construction), would essentially be the same, no differentiation of potential cumulative impacts between the two alternatives would exist during the operational phase.

Two of the projects identified for cumulative impacts analysis – ADOT’s James Ranch Road and the Cochise County-City of Douglas infrastructure project – are development projects that would support the Proposed Action and would involve land disturbance activities. On a smaller scale, the City of Douglas has various local street improvement projects that may also include land disturbance, though to a lesser extent, and mainly on previously disturbed land. The City of Douglas’s plan to revitalize the city largely depends on the implementation of the Proposed Action and its relocation of COV traffic to the proposed Commercial LPOE. The city’s vision to promote growth around the downtown district and connectivity to the RHC LPOE is considered in cumulative impacts as this plan would potentially result in population and economic growth, locally and regionally. The former Phelps Dodge smelter site, while not in operation any longer and not within the footprint of the Proposed Action, continues to be an environmental concern and is presented in cumulative impacts due its historic impact on environmental quality in the region. The past, present, and reasonably foreseeable future actions as identified are discussed in greater detail in Sections 4.2.1 through 4.2.5.

#### 4.2.1 ADOT Extension of James Ranch Road

The proposed Commercial LPOE would be accessed via James Ranch Road, located in Cochise County intersecting SR-80. James Ranch Road is currently an unpaved road and would need to be extended to the proposed Commercial LPOE site. Additionally, the project may include ROW for a water pipeline, wastewater pipeline, and a utility conduit and be the subject of an environmental study. ADOT would be the agency responsible for this project, though close collaboration with GSA, Cochise County, City of Douglas, and other entities would be required. ADOT is currently conducting an environmental study for the improvements of this road and for the extension of the road and associated utilities.

## 4.2.2 Cochise County-City of Douglas Infrastructure Project

Cochise County and the City of Douglas are in the process of completing infrastructure studies that identify infrastructure improvements, primarily for water and wastewater needs, to serve the proposed Commercial LPOE and future regional users. Other state and regional partners are also working to align economic development initiatives and infrastructure investments to enable growth around the new proposed Commercial LPOE. In 2020, Cochise County and the City of Douglas entered into an MOU that details the services and activities each entity would provide to support potential construction of a new Commercial LPOE (Cochise County and City of Douglas 2020). Under this MOU various roles and responsibilities were defined, including the analysis of infrastructure by Cochise County. Studies for water and wastewater utilities are underway to determine the feasibility of providing the City of Douglas water and wastewater utilities to the proposed Commercial LPOE and potential future users (Stantec 2022). After construction of the infrastructure, the City of Douglas would operate and maintain the water and wastewater utility services for the proposed Commercial LPOE and any new development that may occur in the region. Cochise County and the City of Douglas would need to coordinate any infrastructure design with ADOT's planned construction of James Ranch Road. The infrastructure project is anticipated to be completed in 2024, prior to the construction of the proposed Commercial LPOE (Stantec 2022).

Conceptual plans for the proposed water service system include a groundwater well, an elevated storage tank, and water lines in the vicinity of the proposed Commercial LPOE. The proposed water system was designed based on projected water demand from the proposed Commercial LPOE, Cochise College, and developable areas located generally along the proposed waterline. The proposed well and storage tank would potentially be located immediately north of SR-80 at the southeastern corner of the Cochise College campus. A new water main would be constructed from the storage tank along SR-80 and James Ranch Road to connect to the proposed Commercial LPOE. Approximately 4 miles of waterline would be constructed. The proposed well would potentially be drilled 1,000 feet below ground and is anticipated to have a production capacity of 1,000 gallons per minute (Stantec 2022). Prior to drilling the well, the city would be required to file a "Notice of Intent" to Drill, Deepen, Replace or Modify a Well (DWR 55-40)" with ADWR. ADWR would also require a drawdown impact assessment prior to issuing a drilling permit. Development of any new groundwater well would also be subject to the Douglas AMA requirements, which would likely require a permit from ADWR.

Conceptual plans for the proposed wastewater collection system include two lift stations and wastewater collection lines. This proposed system would connect to the existing wastewater collection system at the intersection of SR-80 and US-191, which ultimately connects to the existing City of Douglas WWTP. The planned collection system was designed based on projected wastewater generation rates from the proposed Commercial LPOE, Cochise College, and developable areas generally located along the proposed wastewater collection line. The wastewater line would be located along SR-80, between Cochise College and the intersection of SR-80 and Whitewater Draw, and along James Ranch Road to the proposed Commercial LPOE. Approximately 8 miles of wastewater collection lines would be constructed. A new collection pipe supported on a utility pipe bridge may need to be constructed to support the wastewater pipe crossing Whitewater Draw.

A broadband conduit is proposed to generally cover the same alignment as the wastewater collection system for future telecommunication planning purposes. The proposed conduit would potentially begin at the southeastern corner of the Cochise College campus on SR-80 and extend approximately 7.5 miles east along SR-80 where it would connect to the existing City of Douglas broadband conduit near SR-191. A branch of the broadband conduit alignment would also run south from the intersection of SR-80 and James Ranch Road until it reaches the proposed Commercial LPOE. The total anticipated length of the broadband conduit is approximately 9 miles. Although the location of a broadband conduit was investigated in the infrastructure studies, the installation of the broadband fiber would not be part of the infrastructure project. The county is currently undertaking a broadband feasibility study to improve the telecommunication network in the region that is not part of this infrastructure project.

### 4.2.3 Douglas Infill and Downtown Revitalization Strategy

Industries in both the cities of Douglas and Agua Prieta are heavily dependent on COVs, which can impede traffic flow in both cities, resulting in pollution and safety concerns for both communities. Furthermore, because of the urban setting surrounding the existing port, potential expansion is physically constrained on both sides of the border. Although the potential to relocate COV traffic out of the City of Douglas provides an opportunity for economic growth for the City of Douglas, the community has also expressed concern that potential development along the SR-80 corridor, between the city and the proposed Commercial LPOE, would hinder efforts to revitalize the downtown district and attract infill development to vacant properties (City of Douglas et al. 2021).

With these concerns in mind GSA partnered with USEPA’s Office of Community Revitalization to provide planning assistance to the City of Douglas and technical support specifically in anticipation for the Proposed Action. This collaboration with the city led to the development of the Douglas Infill and Downtown Revitalization Strategy, a planning document that outlines the city’s strategies for leveraging the LPOE projects for economic development consistent with the city’s vision for future growth (City of Douglas et al. 2021). Although it is anticipated that the proposed Commercial LPOE would bring economic benefits for the region, the city would like to ensure that the areas around the existing RHC LPOE continue to thrive while at the same time encouraging commercial and industrial business growth around the proposed Commercial LPOE. The revitalization planning document outlines the key strategies and actions on how to ensure long-term vibrancy in downtown Douglas with infill development and placemaking investments.

The planning document identified areas considered fiscal “hot spots,” including a large portion of the city’s downtown area and an area located less than a quarter mile from the RHC LPOE, at a shopping complex on Pan American Avenue. The planning document also acknowledged that the Proposed Action would provide an important opportunity for improving downtown walkability as about 2,500 people cross the border daily on foot. As such, the planning document calls for the city and GSA to design the RHC LPOE modernization with the goal of creating a highly walkable environment and a better sense of place and arrival for pedestrians. This would tie-in with the city’s planned efforts to redesign G Avenue (a historic district), create more public space, and create a direct connection between the G Avenue district and the RHC LPOE.

The two primary growth areas identified in the planning document are the city’s downtown and the proposed Commercial LPOE. The other focus area identified for growth is the area surrounding the proposed Commercial LPOE, along a SR-80 corridor and just north of the Mexican border. The U.S. and Mexico are working together to route COV traffic through this area rather than the downtowns of Douglas and Agua Prieta. The city envisions this area developing as an industrial and commercial hub, filled with land uses that are more appropriate and function more efficiently outside of the downtown.

### 4.2.4 City of Douglas Roadway Extension and Improvement Projects

The City of Douglas has the following roadway improvement projects that may overlap with the LPOE projects (Pedroza 2022):

- **Chino Road Extension Project to SR-80 and US-191** – Chino Road currently connects to SR-80; however, the extension would branch off the current road and connect at the intersection of SR-80 and US-191, located 2,200 west of the existing connection point. This improvement could include remediation of a 900-foot road section constructed over landfill.
- **Drainage Improvements on 3<sup>rd</sup> Street and Pan American Avenue** – Drainage improvement project located just north of the RHC LPOE.
- **5<sup>th</sup> Street Roadway Improvements** – Improvements would occur from Chino Road to Pan American Avenue

- **2<sup>nd</sup> Street Corridor** – Based upon a review of the Arizona-Sonora Border Master Plan and subsequent discussions with the City of Douglas, the city is contemplating the construction of a 2<sup>nd</sup> Street corridor extending from Chino Road toward Pan American Avenue. Such a project may provide an opportunity for an adjacent pedestrian pick-up/drop-off facility and/or parking for people that prefer to cross the international border on foot.

#### **4.2.5 The Phelps Dodge Copper Smelter Site**

Historically, the City of Douglas has had water, air, and soil pollution problems from the presence of the former Phelps Dodge smelter site, which ceased operation due to issues with its air emissions (City of Douglas 2008). The smelter had a history of stack emission rates for particulate matter and SO<sub>2</sub> exceeding USEPA NAAQS, which led to closure of the facility in 1987. The facility is located between the two LPOE project areas, approximately 0.7 mile west of the existing RHC LPOE and 3.5 miles east of the proposed Commercial LPOE. The smelter facility was demolished in January 1990. Two large slag piles and three closed landfills remain on the property. Two of the closed landfills were historical dumping areas that are now covered in soil, and the third, was a municipal landfill that is now closed.

Various investigations were conducted during the 1980s and 1990s with respect to lead contamination from the former Phelps Dodge smelter site as described in Section 3.13.1.3. The investigations generally found that the smelter had contributed to off-site lead contamination in the soil and chronic lead contamination in the air, which may have lessened since the closure of the facility. Although the Douglas region did not meet NAAQs for SO<sub>2</sub> in 1995, the USEPA approved a maintenance plan in 2006 for attaining these standards, likely due to the closing of the Phelps Dodge smelter facility as it had been the largest source of SO<sub>2</sub> in the region (USEPA; *Federal Register*: February 28, 2006; Volume 71, Number 39).

Additionally, because the Whitewater Draw runs through the center of the former Phelps Dodge smelter site, concerns have been raised about storm flows carrying contaminants from the site south to Agua Prieta (Sonora, Mexico). Contaminants were found in Whitewater Draw and in groundwater. Specifically, lead and arsenic have been found in the Whitewater Draw and in local wells, below action levels (UA 2008). Neither the Whitewater Draw nor any of its tributary streams are currently identified as impaired per the ADEQ 303(d) List of Impaired Waters (ADEQ 2022) or per the Arizona Assessment of Intermittent Streams (ADEQ 2018).

According to the USEPA Superfund Site online database, the former Phelps Dodge smelter site does not qualify for the National Priorities List (USEPA 2022). The site also does not have any active remediation under ADEQ's VRP (ADEQ 2022). For more details, see Section 3.13 Human Health and Safety.

### **4.3 CULTURAL RESOURCES**

Under the Proposed Action, there could be adverse effects under NHPA and direct, significant adverse impacts under NEPA to cultural resources if unanticipated discoveries are encountered during ground-disturbing activities at either the proposed Commercial LPOE or the RHC LPOE project sites. These potential adverse impacts, however, could be mitigated through monitoring during construction ground-disturbing activities by a qualified archaeologist and through impact reduction measures as approved by SHPO. Regarding the historic Main Building and Garage, the following alternatives would result in no adverse effects under NHPA and negligible to minor adverse impacts under NEPA to architectural cultural resources: Alternative 1a, 2a, and 3a. The following alternatives would result in adverse effects under NHPA to architectural historic properties and direct, minor to significant, adverse, and permanent impacts under NEPA: Alternatives 1b, 2b, 3b, 1c, 2c, 3c, 1d, 2d, and 3d. GSA would manage the historic structures through one of the sub-alternatives defined in Section 2.2.1, pending the outcome of ongoing Section 106 consultation with SHPO and consulting parties. For Alternatives 1b, 1c and 1d, GSA would be required to

develop measures to avoid, minimize, or mitigate adverse effects on these historic properties, which would result in less-than-significant impacts under NEPA and would resolve effects under NHPA.

Cumulatively, the development projects identified in Section 4.2, along with the Proposed Action, could result in some level of adverse impacts to cultural resources. The James Ranch Road and infrastructure projects could result in adverse impacts to archaeological resources as these projects would involve ground-disturbing activities. The revitalization plans for the City of Douglas could entail projects that either require ground-disturbing activities or involve the potential impact on a historic property. Proposed projects subject to compliance with NEPA having the potential for significant impacts on cultural resources would be evaluated, including required consultations with regulatory agencies and stakeholders, such as SHPO and tribal governments. Potentially significant impacts could be mitigated through avoidance whenever possible.

#### **4.4 AIR QUALITY AND GREENHOUSE GAS EMISSIONS**

Under the Proposed Action, there would be short-term, minor adverse impacts on the regional air quality during construction due to dust and emissions from equipment and vehicles during construction. Impacts under Alternatives 2 and 3 would be greater in intensity due to overlapping construction schedules of the proposed Commercial LPOE and the RHC LPOE, as well as the larger areas of disturbance. During operation, there would be long-term, minor adverse air impacts from onsite equipment and worker vehicles during operations. Increases in GHG emissions would be negligible, though could be offset from the new sustainable facilities and “net zero” ready infrastructure which would reduce energy use.

Cumulatively, the development projects identified in Section 4.2, along with the Proposed Action, could result in short-term, minor to moderate adverse air quality impacts during construction, depending on the schedule of these projects. The construction of the Proposed Action, James Ranch Road, infrastructure, and street extension and improvement projects could all overlap and result in increased air pollutants and dust. Intensity of the impacts could be greater under Alternatives 2 or 3 with the concurrent construction. In the long-term, the induced increases in POVs from the increased capacity and efficiency of the RHC LPOE and from the city’s revitalization plans would contribute to increased air pollutants and GHGs in the region.

#### **4.5 LAND USE AND VISUAL RESOURCES**

Under the Proposed Action, there would be short-term, minor adverse impacts during construction to surrounding businesses and residential areas from fugitive dust, increased traffic volumes, noise generated by construction activities, or impedance of accessibility to a property. During operation, permanent, beneficial impacts from the relocation of trucks to the new Commercial LPOE would result as the removal of COVs would be in line with the City of Douglas’s revitalization plans to make its city more pedestrian-friendly. Permanent minor to moderate adverse visual impacts to users of state and federal parks could result from the construction and operation of the Commercial LPOE. Permanent, beneficial visual impacts are expected from the modernization of the RHC LPOE as buildings and structures would be upgraded.

Cumulatively, the development projects identified in Section 4.2, along with the Proposed Action, could result in temporary, minor to moderate adverse land use impacts during construction, depending on the schedule of these projects. The construction of the Proposed Action, James Ranch Road, infrastructure, and street extension and improvement projects could all overlap and result in temporary impedances to traffic and accessibility to adjacent or nearby land uses. In the long-term, the infrastructure and street projects, along with the Proposed Action, would result in permanent, beneficial impacts as these projects would be consistent with the region’s vision of creating a commercial and industrial hub on SR-80 and be consistent with the City of Douglas’s long-term vision of revitalizing its downtown district and creating a pedestrian-friendly city. The presence of the former Phelps Dodge smelter site would result in long-term, adverse land use impacts as this site would continue to inhibit development at or adjacent the property.

## 4.6 GEOLOGY AND SOILS

Under the Proposed Action, there would be minor impacts to geology from ground disturbance during construction and permanent, moderate adverse impacts to soils as 80.5 acres would be converted to impervious area at the proposed Commercial LPOE site and up to 22.7 acres would be disturbed at the RHC LPOE (i.e., under Alternative 2 Expansion, which is the alternative with the greatest potential land disturbance).

Cumulatively, the development projects identified in Section 4.2, along with the Proposed Action, could result in some level of local geology and soil disturbance from construction activities and development. Many of the projects described in Section 4.2 would have similar impacts to geology and soil resources as potential impacts under the Proposed Action, as described in Section 3.5.2. These impacts could include excavation activities with disturbance or modification to surficial geology, soil erosion from use of heavy equipment, and impacted soil productivity as surface soils and vegetation would be replaced with mostly paved and impervious surfaces. Similar to the Proposed Action, any future development would be subject to the same Arizona Stormwater CGP requirements, which would limit soil loss on site and reduce potential for cumulative adverse impacts once construction is completed. Negligible adverse impacts would be anticipated to topography. New construction under the Proposed Action and for future development projects would be graded as necessary; however, as the majority of the local topography is relatively flat, grading of soils would be minimal and topography would not change sustainably from current conditions. The residual effects of the former Phelps Dodge smelter site could result in continued adverse impacts, such as the off-site lead contamination of the soil. However, as discussed in Section 3.13, Human Health and Safety, soil sampling conducted at the RHC LPOE expansion areas and proposed Commercial LPOE to investigate potential contamination from the Phelps Dodge smelter site did not demonstrate any exceedances of ADEQ Non-Residential SRLs. These results suggest that similar, low levels are present in regional soils.

## 4.7 WATER RESOURCES

Under the Proposed Action there would be the potential for short-term, minor adverse impacts to water resources during construction and long-term, minor adverse impacts under operations. During construction adverse impacts to water quality could occur from soil erosion or contaminated runoff; however, adherence to AZPDES permit requirements, including the development of a SWPPP, would minimize these impacts. During construction of the proposed Commercial LPOE, water would be sourced from a new water well that the City of Douglas plans to drill to support the Proposed Action and additional future projects in the area. A permit from ADWR would be required to authorize the drilling and use of a new well, to minimize adverse impacts to groundwater resources. During operations, any increased water demand from the proposed Commercial LPOE and new facilities at the RHC LPOE would be offset as the new facilities would be constructed to achieve LEED certification with Gold-level standards at a minimum, which may integrate WCMs to reduce water usage. There would be long-term minor adverse impacts to surface water due to the increased impervious areas and increased runoff, resulting in degradation of water quality. The intensity of surface water impacts would be greatest under Alternative 2 due to this alternative having the largest expansion area. Short-term adverse impacts to the local groundwater would occur from water usage during construction; intensity of groundwater usage would be greater under Alternatives 2 and 3 due to concurrent construction.

Cumulatively, all projects identified in Section 4.2, along with the Proposed Action, could result in long-term, minor to moderate impacts to water resources. The development projects would result in similar adverse impacts as the Proposed Action. During construction of the projects, there would be short-term, minor impacts from the potential for sedimentation and the potential for spills; potential impacts to water quality during construction would be mitigated through AZPDES permit requirements. The existence of the former Phelps Dodge smelter site could result in adverse impacts from continued degradation of downstream water quality.

Use of a new well to be constructed by the City of Douglas could cause minor to moderate impacts to local wells, the local aquifer, and ultimately the availability of groundwater, especially if construction schedules overlap. The revitalization of the City of Douglas, which also considers the potential development of the SR-80 corridor, could result in an increase in population and businesses in the area. This population increase would result in higher water demands and, thus, higher rates of groundwater usage and higher drawdowns within the local aquifer. As part of the Cochise County-City of Douglas infrastructure project, an 800-foot radius of influence of a new well was estimated based on a theoretical drawdown calculation assuming uniform aquifer properties (Stantec 2020). Because the nearest identified well is located over 2,000 feet from the proposed well location, use of the well by projected regional users is not expected to interfere with other well users, though this analysis was based on uniform aquifer properties (Stantec 2022). As discussed in Section 3.6.1.3, new developments in the Douglas AMA would be subject to the groundwater withdrawal restrictions of A.R.S. § 45-416. All future groundwater wells would be installed and permitted pursuant to state regulations. All wells would require an impact analysis per ADWR to determine if nearby wells would be impacted. An impact is defined as 10 feet of drawdown in a five-year period.

The potential for flooding hazards could increase due to increased impervious area related to development projects in the City of Douglas. The street improvement projects include drainage improvement along Pan American Avenue and 3<sup>rd</sup> Street, which would improve the management of stormwater. Additionally, the city's revitalization strategy includes working with GSA to provide walking path and green space which could offset potential flooding issues.

#### **4.8 BIOLOGICAL RESOURCES**

Under the Proposed Action, there would be long-term and permanent, negligible to moderate adverse impacts to biological resources. This includes direct, moderate adverse impacts from vegetation loss, habitat disturbance, and potential mortality from vehicle encounters, as well as minor, adverse, and indirect impacts from noise and increased human activity resulting in wildlife avoidance. Alternative 2 would have the greatest biological impacts compared to Alternative 1 or 3, as the expansion area at the RHC LPOE under Alternative 2 includes more undeveloped land. The alternatives are not likely to adversely affect federal and state special status species as discussed in Section 3.7.2. Therefore, effects to these species are expected to be negligible.

Cumulatively, the development projects identified in Section 4.2, along with the Proposed Action, could result in permanent, minor to moderate adverse impacts to biological resources. In addition to the Proposed Action, the development projects and revitalization plans for the city could collectively result in additional cumulative impacts on vegetation and wildlife habitat. Projects proposed to be located on currently undeveloped land, such as infrastructure construction, would generally result in greater amounts of vegetation loss or habitat disturbance than proposed projects located within highly developed areas, including most of the areas surrounding the RHC LPOE and the Douglas downtown district. Overall impacts from development projects would remain at less than significant levels with implementation of applicable permit requirements and BMPs (i.e., minimizing area of disturbance, revegetation with native plants, timing construction activities to avoid sensitive breeding or migration periods, etc.) and adherence to relevant federal and state regulations. The existence of the former Phelps Dodge smelter site could result in adverse impacts, such as the degradation of aquatic habitats downstream.

#### **4.9 TRANSPORTATION AND TRAFFIC**

Under the Proposed Action there would be temporary, minor to moderate adverse impacts to transportation resources and traffic during construction; and long-term, minor, adverse to beneficial impacts during operations on the roadways serving the proposed Commercial LPOE and the RHC LPOE, mainly SR-80, US-191, and Pan American Avenue. The expansion of the RHC LPOE under any alternative would require the closure of Customs Avenue between Pan American Avenue and 1<sup>st</sup> Street to accommodate the new site plan, which would require vehicles to access businesses on 1<sup>st</sup> Street from the east. Traffic impacts under



Alternatives 2 and 3 would overlap at the proposed Commercial LPOE and expanded RHC LPOE due to concurrent construction; therefore, Pan American Avenue, US-191, and SR-80 would experience greater traffic impacts than under Alternative 1. Traffic analyses indicate that affected roadways would have more than enough capacity to handle additional traffic from the Proposed Action, during construction and operations for both alternatives. During operations, the relocation of COV processing to the proposed Commercial LPOE would decrease traffic congestion, noise levels, air pollutants, and safety hazards associated with truck traffic routed through the City of Douglas.

Cumulatively, the development and street projects identified in Section 4.2, along with the Proposed Action, could result in temporary, minor to moderate adverse impacts during construction. The extent of impacts would depend on the timing of construction, as overlapping construction schedules could cause greater traffic congestion and delays, greater road hazards, greater vehicular emissions, and greater wear and tear on the local roadways. The revitalization of the City of Douglas, which also considers the potential development of the SR-80 corridor, could also result in an increase in vehicles in the region and result in long-term LOS degradation of the roadways. Furthermore, the increased efficiency of the modernized port could increase future traffic volumes. Because the LPOE would be upgraded, there would be more POVs passing through per hour as processing times would decrease. Additionally, a conservative growth rate of 2 percent was used to estimate the increase in POV traffic volumes in the traffic analysis (see Section 3.8.1.3), which would lead to elevated traffic volumes throughout the city over time. The Chino Road extension and 2<sup>nd</sup> Street corridor projects could provide additional routes to and from the RHC LPOE. Over the long term, the number of POVs on roadways could increase; thus, overall POV traffic passing through the LPOE could also increase, leading to increased traffic and congestion.

#### **4.10 NOISE**

Under the Proposed Action, short-term, minor adverse noise impacts could occur from construction equipment and vehicles. Due to concurrent construction, short-term, minor to moderate adverse noise impacts would be greater under Alternatives 2 and 3 compared to Alternative 1. Construction-related traffic on SR-80, US-191, and Pan American Avenue could increase detectable noise levels to sensitive receptors located along these roadways. The closure of Customs Avenue between Pan American Avenue and 1<sup>st</sup> Street would require vehicles accessing businesses on 1<sup>st</sup> Street to use G and H Avenues, which could increase traffic noise on those streets. During operations, permanent, minor adverse noise impacts would occur at the proposed Commercial LPOE from activities and associated COV traffic; permanent, beneficial noise impacts would occur at the modernized RHC LPOE and the City of Douglas from the relocation of COV trucks to the new Commercial LPOE.

Cumulatively, construction activities for the development projects listed in Section 4.2, along with the Proposed Action, would increase noise levels locally and could occur in the vicinity of sensitive receptors located near the project areas and along travel routes for construction-related traffic. This would result in short-term, minor to moderate adverse impacts. The extent of noise impacts would depend on the schedule of the construction schedule for each of the projects; further increases in noise levels could be detected by sensitive receptors if construction of the projects overlapped. Permanent, moderate adverse noise impacts from vehicular traffic could occur on SR-80 and US-191 if the region attracts industrial and commercial businesses to relocate along SR-80 due to its proximity to the proposed Commercial LPOE. The City of Douglas would experience a reduction in overall noise levels from the removal of COV traffic; however, overall noise levels could increase from urban growth envisioned in the City of Douglas's revitalization plan and also from an increase in POVs and buses due to more efficient operations at the RHC LPOE.

#### **4.11 INFRASTRUCTURE AND UTILITIES**

Under the Proposed Action there would be the potential for temporary, negligible adverse impacts on infrastructure and utilities during construction and long-term, negligible to minor adverse impacts during operations from increased demand. During operations, increased demand from new workers at both LPOE

sites would increase water and energy demand. Potential adverse impacts would be minimized as the proposed Commercial LPOE and modernized RHC LPOE would have greater water and energy efficiencies. The proposed facilities would be built to LEED Gold standards, at a minimum; be “net zero ready” in terms of energy use; and adhere to the CEQ’s *Guiding Principles for Sustainable Federal Buildings*.

Cumulatively, the development projects identified in Section 4.2, along with the Proposed Action, could result in long-term, moderate, adverse impacts to the City of Douglas’s water and wastewater systems. As discussed in Section 4.2.2, the County-City infrastructure project would connect to local and regional systems and would increase demand on these systems, resulting from new development induced by the revitalization of the City of Douglas and operation of the proposed Commercial LPOE, including potential development along the SR-80 corridor. The City of Douglas has acknowledged that existing wells serving the city do not meet current needs (see Section 3.10.1.3). The city is looking to either construct new wells or rehabilitate existing wells (Stantec 2020). As discussed in Section 3.6.1.3, new well developments in the Douglas AMA would be subject to the groundwater withdrawal restrictions of A.R.S. § 45-416.

The planned infrastructure project includes a new wastewater system that would require connection into the City of Douglas’s WWTP. Based on historic flows into the WWTP and projected wastewater generated by the proposed Commercial LPOE and potential development in the region, it is estimated that the WWTP may reach its capacity of 2.6 million gallons per day by 2040 (Stantec 2022). The City of Douglas would evaluate the rates of wastewater flow into the WWTP and update the facility’s master plan as appropriate, to potentially include expansion of the WWTP prior to 2040.

## **4.12 SOCIOECONOMICS**

Under the Proposed Action, there would be short-term, moderate to significant beneficial impacts from increasing jobs, local spending in the community, and associated tax revenue during the construction phase. Under Alternatives 2 and 3, spending on labor and materials would be similar but likely less than under Alternative 1, due to decreased cost escalation and inflationary pressures from the compressed project timeline. Impacts would be greater in the near term but would occur for a shorter duration than under Alternative 1. The acquisition of parcels within the Alternative 1 Expansion Area would displace a duty-free shop, as well as eliminate a small city park and a bus stop. The acquisition of parcels within the Alternative 3 Expansion Area would displace at least one active business and three residences, as well as demolish several commercial buildings potentially affecting business owners using them for storage. During operations, long-term, moderate to significant beneficial impacts from increased job opportunities and revenue for the region could occur, while long-term, minor adverse impacts could result from induced increases in population, leading to adverse effects on the quality of education and demand on community services.

Cumulatively, the development projects discussed in Section 4.2, have the potential to support future development and permanent job creation, which would result in long-term, beneficial cumulative impacts. Additionally, the city and county would have increased capacity to support existing and additional demand on utilities and infrastructure as a result of the development projects identified in Section 4.2, which could have long-term, beneficial cumulative impacts on quality of life for residents in the ROI. The proposed County-City infrastructure project would allow for the development of new trade and businesses in the vicinity of the Commercial LPOE. Cochise County has designated part of this area for what is expected to be an industrial and commercial hub, and the movement of commercial activities would allow for greater expansion of tourist attractions near the downtown area (City of Douglas et al. 2021). The city’s street extension and improvement projects would support future city development projects in line with the city’s revitalization plans.

## **4.13 ENVIRONMENTAL JUSTICE AND PROTECTION OF CHILDREN'S HEALTH AND SAFETY**

Under the Proposed Action, there would be disproportionate impacts to low-income and minority populations and child populations from increased air pollutants, traffic congestion, and noise both from construction and operation; however, no impacts would be disproportionately high and adverse. The acquisition of the Alternative 3 Expansion Area would displace three residences in an area characterized as a potential environmental justice population; however, GSA would negotiate with landowners during the land acquisition process to provide fair compensation. There would be negligible to moderate beneficial impacts to low-income and minority populations from increased job opportunities, and at the RHC LPOE, there would be long-term, negligible to minor beneficial impacts from the removal of the COVs.

Cumulatively, the development projects discussed in Section 4.2 could have moderate adverse impacts from increased air emissions and congestion if the construction of the projects occurred at the same time. Emergency response services may experience time delays over a longer period of time if the construction periods from these projects occurred sequentially. Health impacts and economic benefits would occur in a similar manner. Due to the demographics of the surrounding region, these impacts would likely disproportionately impact environmental justice populations.

In the long term, the development projects and the City of Douglas's revitalization plans would be expected to have minor to moderate, localized cumulative impacts on environmental justice populations due to an increase in jobs and economic activity in the city, and associated economic, social, and health benefits.

## **4.14 HUMAN HEALTH AND SAFETY**

Under the Proposed Action, there would be short-term, negligible adverse impacts to human health and safety during construction. The potential for adverse impacts is greater under Alternatives 2 and 3 compared to Alternative 1 as the processing of COV traffic would remain onsite during construction at the RHC LPOE, resulting in a higher risk for traffic-related accidents, as well as increased potential to encounter contaminated soils in the Alternative 2 or 3 Expansion Areas. During operations, long-term beneficial impacts are expected as COV traffic would be relocated to the new Commercial LPOE and, therefore, would result in improved traffic safety conditions for workers at the RHC LPOE and the City of Douglas.

Cumulatively, development projects identified in Section 4.2, along with the Proposed Action, could result in short-term, negligible to minor adverse impacts to human health and safety during construction; and long-term negligible to minor cumulative beneficial impacts would be expected during operation. The development projects would have similar negligible to minor impacts for construction and operation activities as those potentially resulting from actions discussed from the Proposed Action, as described in Section 3.13.2. Risks to health and safety of personnel and patrons would increase slightly during the construction phase of the projects; however, these risks would be minimized by adhering to OSHA regulations, the use of protective gear and equipment, and the implementation of BMPs. Project-specific impacts from hazardous waste and materials would be reduced through conformance with applicable regulatory requirements and implementation of appropriate avoidance, management, and mitigation measures as required by OSHA and RCRA. Therefore, the potential adverse cumulative impacts associated with human health and safety would not be significant when considered with other present and future projects. The potential presence and exposure to soil contamination in the project areas is elevated due to the proximity and historic contamination of the former Phelps Dodge smelter site. However, as discussed in Section 3.13.1.3, soil sampling conducted at the RHC LPOE expansion areas and proposed Commercial LPOE to investigate potential contamination of the Phelps Dodge smelter site did not demonstrate any exceedances of ADEQ Non-Residential SRLs. These results suggest that similar, low levels are present in regional soils.

## **CHAPTER 5 SHORT-TERM USE OF THE ENVIRONMENT VS LONG-TERM PRODUCTIVITY AND COMMITMENTS OF RESOURCES**

### **5.1 RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY**

Section 102(C)(iv) of NEPA [42 USC § 4332] and 40 CFR 1502.16 require an EIS to address “*the relationship between local short-term uses of man’s environment and the maintenance and enhancement of long-term productivity.*” This involves the consideration of whether a Proposed Action is sacrificing a resource value that might benefit the environment in the long-term, for some short-term value to the project proponent (GSA) or the public.

The purpose of the Proposed Action is to accommodate the long-term CBP requirements for the current tenants located at the RHC LPOE that would meet applicable building code, accessibility, and security standards. Furthermore, the purpose is to make such accommodations primarily within the City of Douglas and Cochise County, Arizona market in a cost-effective manner that would not substantially disrupt the federal tenants from achieving their agency mission.

Project areas impacted under the Proposed Action include the proposed Commercial LPOE site, which is currently vacant, undeveloped land, characterized by areas of desert scrub and semi-desert grasslands. The proposed site includes an ephemeral stream in the southeast corner, along the eastern edge of the proposed site boundary. The Proposed Action would develop up to 80.5 acres of land into impervious area and would remove existing vegetation, which would result in the alteration of the existing ecological community. Development of the site would further contribute to habitat fragmentation; however, the vegetation does not represent high-quality native habitat for local species. The RHC LPOE is located on primarily developed land. The Alternative 1 Expansion Area consists mainly of developed land but also includes a 0.4-acre area of open land, including a park with a washroom facility, sidewalks and a few trees. The Alternative 2 Expansion Area includes approximately 13.9 acres of undeveloped open land. Most of this area was previously disturbed and lacks surface water resources or viable wildlife habitat. The Alternative 3 Expansion Area is mostly developed land with buildings, graded or paved surfaces, compacted soils, and less than one acre of open vegetated land that has been disturbed by prior uses. The expansion areas are surrounded by developed areas, including roads, and would not feasibly be used for natural resource management or agriculture.

The LPOE sites do not possess existing unique and enduring resources or environmental values whose long-term potential benefits would be sacrificed to provide short-term value to the project proponent (GSA). The Proposed Action, if implemented, would last for many decades. The short-term impacts on the environment would be offset by the benefits that the Proposed Action would generate in the long term. The Proposed Action would fulfill security goals and provide mitigation of current adverse traffic conditions, safety hazards, and reduced efficiency at the LPOE.

### **5.2 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES**

Section 102(C)(v) of NEPA [42 USC § 4332] requires EISs to address “any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.” Irreversible and irretrievable commitments of resources mean losses to, or impacts on, natural resources that cannot be recovered or reversed.

More specifically, “irreversible” implies the loss of future options. Irreversible commitments of resources are those that cannot be regained, such as permanent conversion of wetlands and loss of cultural resources, soils, wildlife, agricultural, and socioeconomic conditions. The losses are permanent and incapable of being reversed. “Irreversible” applies mainly to the effects from use or depletion of nonrenewable resources, such

as fossil fuels or cultural resources, or to those factors, such as soil productivity, that are renewable only over long periods of time.

“Irretrievable” commitments are those that are lost for a period of time, such as the temporary loss of timber productivity in forested areas that are kept clear for use as a ROW, road, or winter sports site. The lost forest production is irretrievable, but the action is not irreversible. If the use changes back again, it is possible to resume timber production.

### **5.2.1 Irreversible Commitments of Resources**

Under the Proposed Action, the following irreversible commitments of resources would occur:

- Consumption of fossil fuels (primarily diesel) and lubricants by heavy construction equipment (e.g., bulldozers and Caterpillars, graders, scrapers, excavators, loaders, trucks) used to excavate and develop the land for the new proposed Commercial LPOE and the expansion areas at the RHC LPOE;
- Consumption of fossil fuels (primarily diesel) and lubricants by heavy construction equipment used to construct the new facilities at the proposed Commercial LPOE and the RHC LPOE;
- Materials used to construct the new facilities, including cement/concrete, soil cement, steel, iron and other metallic alloys, copper wiring, PVC pipe, plastic, etc.;
- Energy, supplied by fossil fuels or some other source of electricity, used over the operational life of the proposed Commercial LPOE and the RHC LPOE;
- Land required for development at the proposed Commercial LPOE and the expansion areas; and
- Water used for construction purposes.

### **5.2.2 Irretrievable Commitments of Resources**

As noted above, “irretrievable” commitments of resources are those that are lost for a period of time, but not permanently. The Proposed Action would entail the long-term loss of minimal amounts of vegetation at the proposed Commercial LPOE (up to 80.5 acres) and the RHC LPOE (up to 0.4 acres for Alternative 1; up to 14.3 acres for Alternative 2; and up to 1.4 acres of vegetated land for Alternative 3).

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## APPENDIX A – PUBLIC SCOPING REPORT

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# 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

## Public Scoping Report

Prepared for:



General Services Administration  
Pacific Rim Region 9

Submitted by:



Potomac-Hudson Engineering, Inc.  
350 10<sup>th</sup> Avenue, Suite 1000  
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January 2023

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## ACRONYMS AND ABBREVIATIONS

CBP	Customs and Border Protection
CEQ	Council on Environmental Quality
CFR	<i>Code of Federal Regulations</i>
COV	commercially-owned vehicle
EIS	Environmental Impact Statement
FR	<i>Federal Register</i>
GSA	General Services Administration
I-10	Interstate 10
LPOE	Land Port of Entry
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NOI	Notice of Intent
NRHP	National Register of Historic Places
POV	privately-owned vehicle
RHC LPOE	Raul Hector Castro Land Port of Entry
SHPO	State Historic Preservation Officer
SR-80	State Route 80
US-191	U.S. Highway 191
USC	United States Code

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## CHAPTER 1 INTRODUCTION

This Public Scoping Report summarizes the General Services Administration's (GSA) public scoping activities and public comments on the Environmental Impact Statement (EIS) for the Expansion and Modernization of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) and Proposed Commercial LPOE in Douglas, Arizona. GSA has prepared the EIS for the purpose of analyzing the potential environmental impacts resulting from the project, in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321 *et seq.*), the Council on Environmental Quality (CEQ) regulations implementing National Environmental Policy Act (NEPA) (40 *Code of Federal Regulations* [CFR] 1500-1508), GSA Order ADM 1095.1F (*Environmental Consideration in Decision Making*), the GSA Public Building Service's *NEPA Desk Guide*, and other relevant federal and state laws and regulations.

The public scoping period began on July 14, 2022, when GSA issued a Notice of Intent (NOI) to prepare an EIS in the *Federal Register*, under Docket ID No. FR Doc. 2022-14815 (FR vol. 87, no. 134). As part of the NEPA process, the NOI also announced the date, time, and location for the public scoping meeting and public comments were requested to be received within the 40-day scoping period, no later than August 22, 2022.

This report describes the project (i.e., background, project location and facilities, Proposed Action and alternatives) and the public scoping meeting and also includes scoping materials used. The potential issues identified from the comments received during the public scoping period are summarized in Section 5.3. GSA took these issues into consideration when defining the scope and areas of emphasis (or focus) of the EIS. This document also includes the following appendices:

- Appendix A: *Federal Register* Notice
- Appendix B: Newspaper Affidavits
- Appendix C: Letter to Interested Parties
- Appendix D: Advertising on Social Media
- Appendix E: Scoping Meeting Poster Displays
- Appendix F: Scoping Comment Form
- Appendix G: Scoping Meeting Handouts
- Appendix H: Scoping Meeting Sign-In Sheets
- Appendix I: Index of Comments by Source and Date

## CHAPTER 2 PROJECT DESCRIPTION

The RHC LPOE is a port of entry for vehicles and pedestrians crossing the U.S.-Mexico border, between Douglas, Arizona and Agua Prieta, Sonora in Mexico. The port is operated by the U.S. Department of Homeland Security's Customs and Border Protection (CBP), and is a full-service, multi-modal facility where CBP officers inspect commercially-owned vehicles (COVs), privately-owned vehicles (POVs), and pedestrians. The port has been operating since 1914, with existing facilities constructed in the 1930s. Due to steady increases in traffic, poor pedestrian infrastructure, lack of separations between traffic types (COV, POV, and pedestrian), and undersized facilities at the end of their functional life, the facilities at the RHC LPOE no longer function adequately and pose safety and security risks for CBP officers and the general public. The existing RHC LPOE has spatial constraints, with limited interior space for offices and processing and limited opportunity for expansion within its current footprint. The City of Douglas has also expressed concerns with hazardous materials utilized in the mining industry being transported across the border in commercial trucks and passing through the urban core of their community. To address these varied concerns, the Proposed Action is to expand and modernize the existing RHC LPOE and construct a new Commercial LPOE to the west of the existing facilities.

### 2.1 PROJECT LOCATION

The City of Douglas is the main urban border community encompassing the project area; it is located in southeastern Arizona, approximately 120 miles southeast of Tucson, in Cochise County. Regional access to the existing 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), located approximately 63 miles northwest of the city. See Figure 1 for a regional map of the project area.

The RHC LPOE is located on approximately 5 acres with facilities owned and managed by GSA and operated by CBP. The existing port is bounded by Customs Avenue to the east, 1st Street to the north, Pan American Avenue to the west, and the U.S.-Mexico border to the south. Construction of the current facility began in the 1930s, including the historic Main Building and Garage. The last renovations took place in 1993. Adjacent land to the RHC LPOE under consideration for acquisition includes a small city park, a cluster of small shops, and undeveloped land. See Figure 2 of the RHC LPOE and surrounding areas.

The planned 80.5-acre site for the proposed Commercial LPOE is approximately 5 miles west of the existing RHC LPOE located off James Ranch Road. The site is primarily undeveloped; the only major infrastructure consists of a U.S. Border Patrol Station built in 2003 at the intersection of SR-80 and Kings Highway. See Figure 3 of the proposed Commercial LPOE site and surrounding areas.



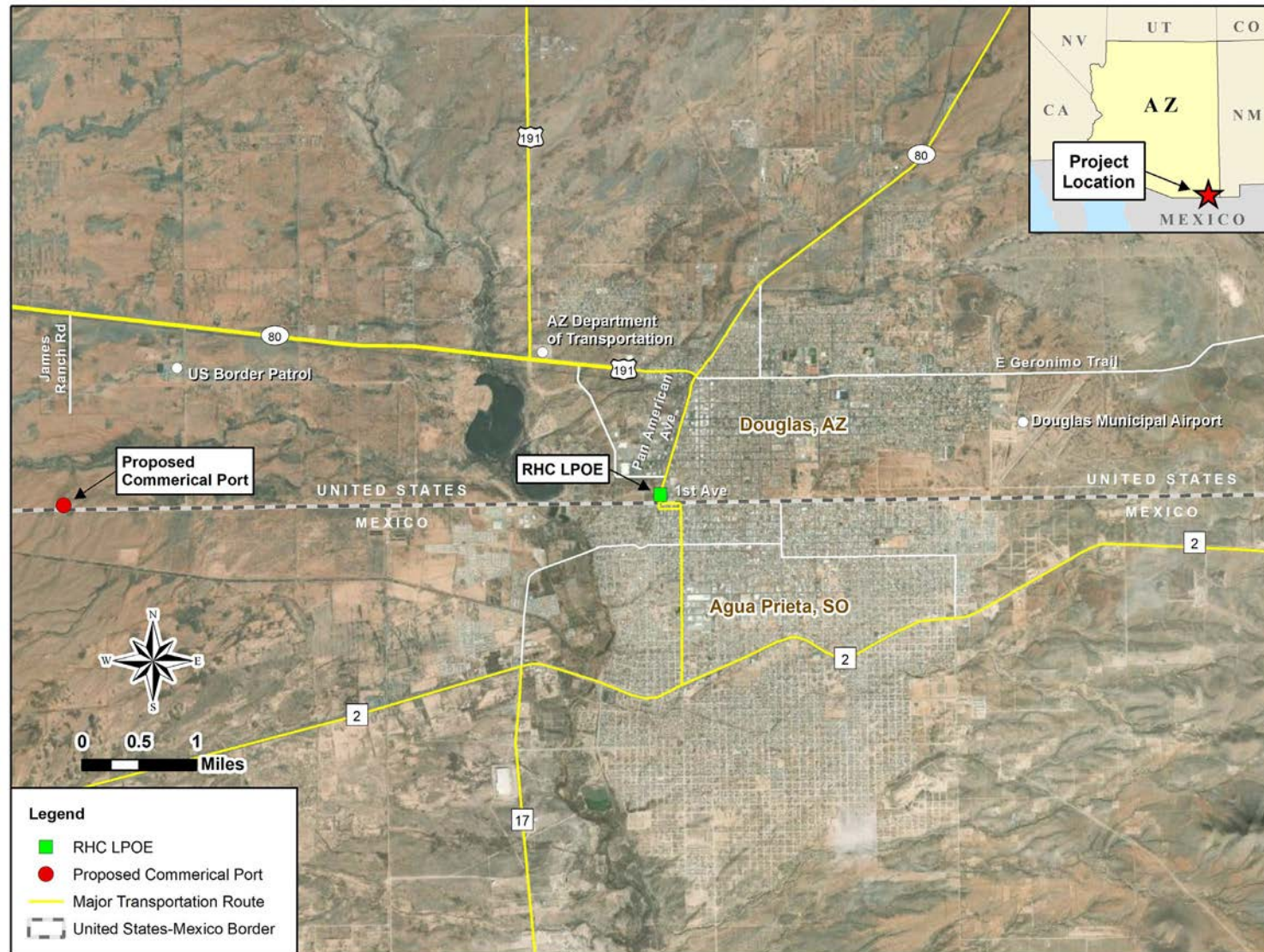


Figure 1. Location Map of the RHC LPOE and Proposed Commercial Port



Figure 2. The RHC LPOE and Surrounding Areas



Figure 3. The Proposed Commercial LPOE Site and Surrounding Areas

## 2.2 EXISTING FACILITIES AT THE RHC LPOE

Figure 4 illustrates the existing facilities at the RHC LPOE, which consist of POV inspection processing facilities, pedestrian processing facilities, and commercial processing facilities. Additional facilities at the RHC LPOE include the historic Main Building and Garage, which were built in 1933 and are listed on the National Register of Historic Places (NRHP). Due to the historic designation, any renovation work to the original 1933 buildings would require compliance with the National Historic Preservation Act (NHPA) of 1966 and the U.S. Secretary of the Interior's *Standards for Rehabilitation*. See Figure 5 for a representative photo of the historic Main Building.

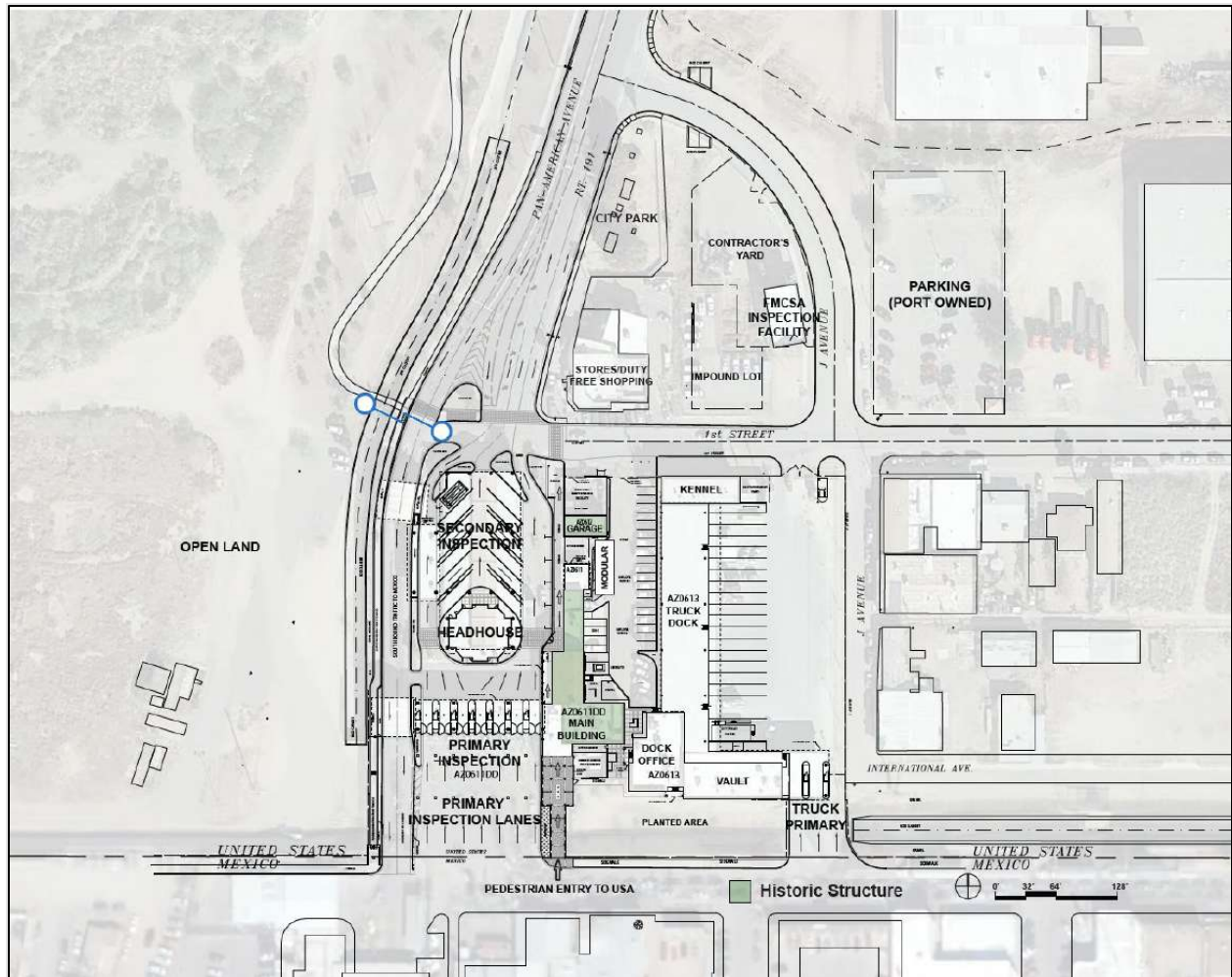


Figure 4. Existing Site Layout of the RHC LPOE



Figure 5. Historic Main Building – West Facade

## 2.3 PURPOSE AND NEED

The purpose of this 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.

In order to bring the RHC LPOE operations in line with CBP's design standards and operational requirements, the project is needed to:

- 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.

## 2.4 PROPOSED ACTION AND ALTERNATIVES

The Proposed Action is defined as the expansion and modernization of the existing RHC LPOE and construction of a new Commercial LPOE, as follows:

- 1) **Construction of a new Commercial LPOE** – A new, dedicated LPOE would be constructed to process only COVs at an undeveloped site located approximately 5 miles west of the RHC LPOE; and
- 2) **Expansion and Modernization of the Existing RHC LPOE to a Non-Commercial LPOE** – The existing RHC LPOE would be expanded and modernized. This non-commercial facility would be dedicated to processing only POVs and pedestrians.

Two action alternatives are being considered. *Alternative 1 – Sequential Construction*, would include construction of a new Commercial LPOE first, followed by a phased expansion and modernization of the existing RHC LPOE after the Commercial LPOE is operational. *Alternative 2 – Concurrent Construction*, would include construction of the new Commercial LPOE and phased expansion and modernization of the existing RHC LPOE at the same time.

As illustrated in Figure 6, both alternatives would require the acquisition of land near the RHC LPOE; however, Alternative 2 would require additional land acquisition so as to allow for expansion and modernization activities to occur while the port remains operational. Figures 7 and 8 illustrate conceptual site layouts for the proposed Commercial LPOE and the expanded and modernized RHC LPOE, respectively.



**Figure 6. Expansion Areas for Alternative 1 and Alternative 2**

Sub-alternatives would be considered for each alternative with respect to the management of the historic structures located at the existing RHC LPOE.

Under the No Action Alternative, GSA would not move forward with either alternative. The No Action Alternative serves as a baseline scenario for which potential environmental consequences can be compared to for this EIS.

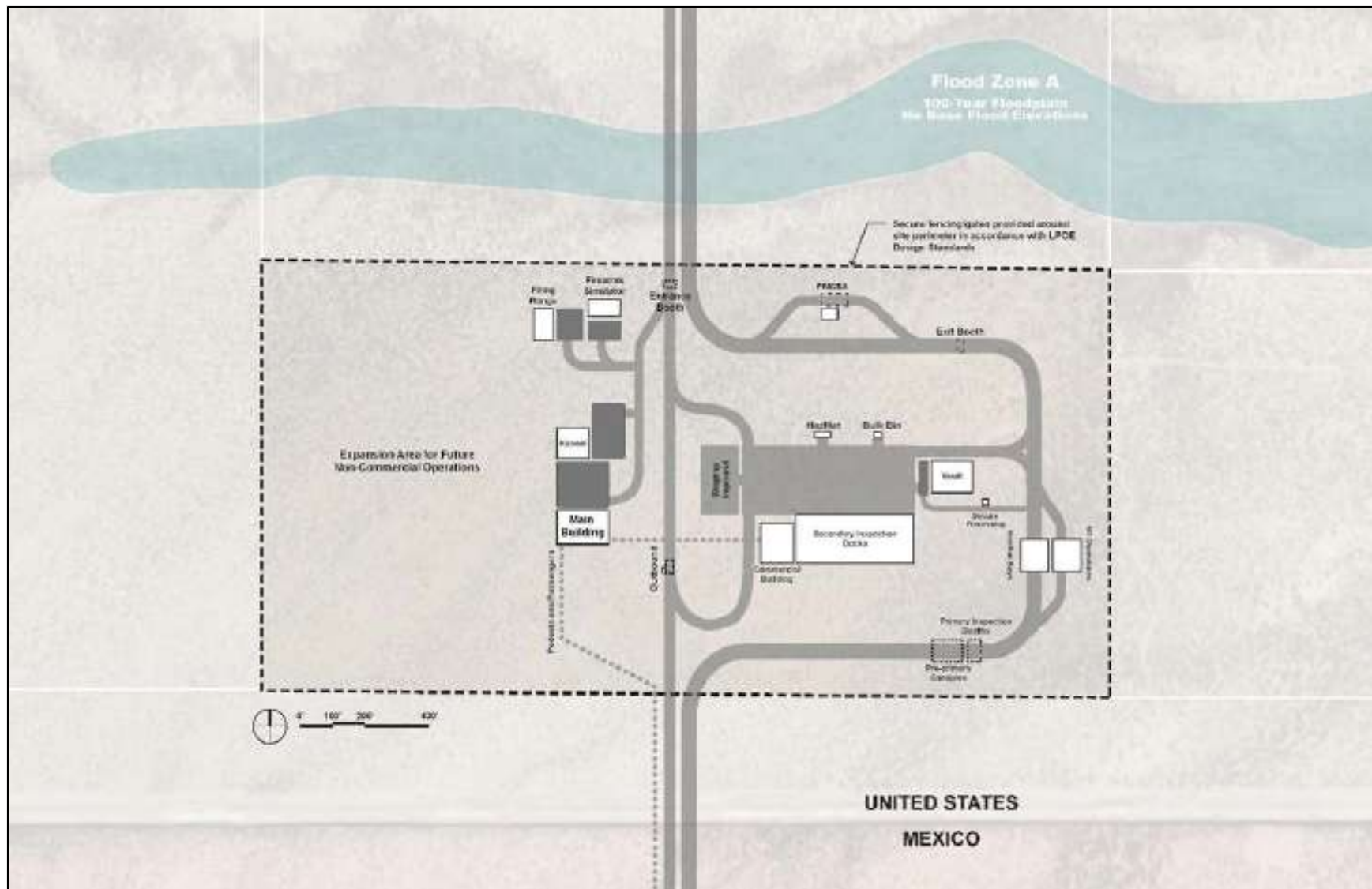


Figure 7. Conceptual Site Layout of the Proposed Commercial LPOE

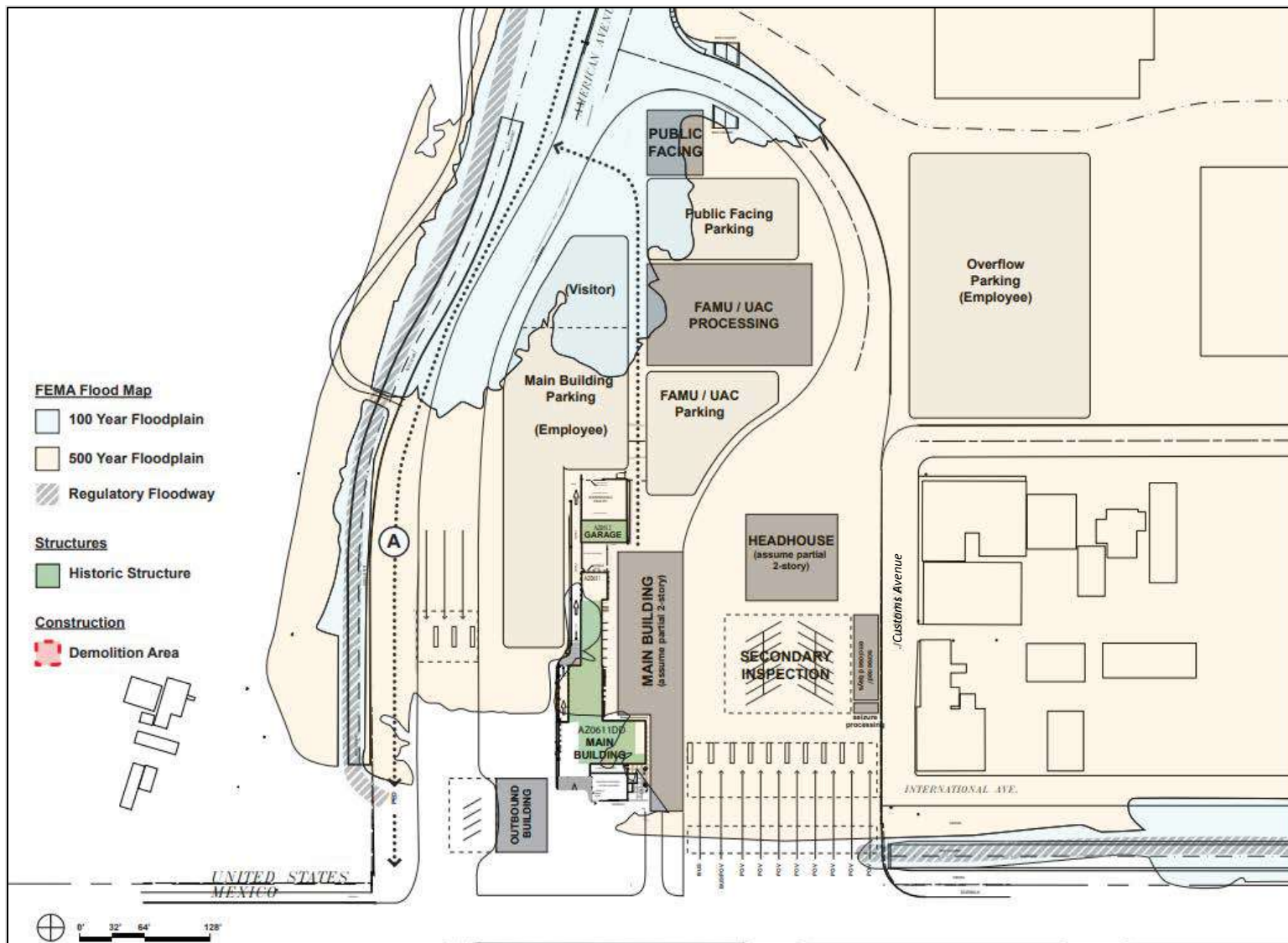


Figure 8. Conceptual Diagram for a Final Phase During Expansion and Modernization of RHC LPOE



## CHAPTER 3 NOTIFICATION OF PROJECT SCOPING

Notification of project scoping for this EIS was accomplished using multiple channels of communication, including an NOI in the *Federal Register*, newspaper ads, letters to interested parties, and social media posts.

### 3.1 NOTICE OF INTENT

An NOI for the EIS was published in the *Federal Register* on July 14, 2022. The NOI announced the date, time, and location of the public scoping meeting and announced that public comments were requested to be received within the 40-day scoping period, no later than August 22, 2022. The NOI also indicated GSA's intent to prepare an EIS and conduct a scoping meeting; provided a brief description of the project; and included instructions on submitting a comment. The *Federal Register* notice is included in Appendix A.

### 3.2 NEWSPAPERS ADVERTISEMENTS

GSA published three advertisements in English and Spanish, each, for a total of six advertisements in the local newspaper in the weeks preceding the August 11, 2022 public scoping meeting. The advertisements indicated GSA's intent to prepare an EIS and conduct a scoping meeting; provided a brief description of the project; identified the public scoping meeting date, time, and location; and included instructions on submitting a comment. The advertisements also requested that public comments be received within the 40-day scoping period, no later than August 22, 2022. The advertisements were published in the *Herald Review* on July 20, August 3, and August 7, 2022. Affidavits of the legal notices are included in Appendix B.

### 3.3 INTERESTED PARTIES LETTER

A scoping letter dated July 14, 2022 was mailed to federal agencies, state and local agencies, elected officials, and other interested parties. The letter provided background on the project, a description of the alternatives, scoping meeting details, and instructions on submitting comments. A copy of the letter sent to interested parties is included in Appendix C.

### 3.4 SOCIAL MEDIA

In advance of the August 11, 2022 public scoping meeting, GSA posted announcements of the meeting on two social media accounts on July 28, 2022 and on the following GSA LPOE websites:

- Proposed Commercial LPOE - <https://www.gsa.gov/about-us/regions/welcome-to-the-pacific-rim-region-9/land-ports-of-entry/douglas-commercial-land-port-of-entry>
- RHC LPOE – <https://www.gsa.gov/about-us/regions/welcome-to-the-pacific-rim-region-9/land-ports-of-entry/raul-hector-castro-land-port-of-entry>

The City of Douglas also posted announcements of the meeting on the city's social media accounts on July 27 and 28, August 4, 5, and 10, 2022.

The social media posts briefly summarized the purpose of the meeting and detailed the time, date, and location of the meeting. Screenshots of the social media postings can be found in Appendix D

### 3.5 MISCELLANEOUS SOURCES OF INFORMATION

After the public scoping meeting, the City of Douglas provided the poster displays and handouts that were provided at the meeting on their website: <https://www.douglasaz.gov/471/Border-Crossing-Initiatives>. The City of Douglas also made these poster displays available in the City Hall lobby for approximately one month after the scoping meeting.

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## CHAPTER 4 PUBLIC SCOPING MEETING

This section summarizes the public scoping meeting, including a description of the purpose; time, date, and location of the meeting; and meeting format.

### 4.1 PURPOSE

The purpose of the public scoping meeting was to provide the public with information regarding the proposed project, answer questions, identify concerns regarding the potential environmental impacts that may result from implementation of the proposed project, and gather information to determine the scope of issues to be addressed in the EIS.

### 4.2 MEETING DETAILS AND LOCATION

The public meeting was held on Thursday, August 11, 2022 from 4 p.m. to 6 p.m. at the Douglas Visitor Center located at 345 16<sup>th</sup> Street, Douglas, Arizona, 85607. Approximately 42 people attended the public meeting.

### 4.3 OPEN HOUSE FORMAT

An open house format of the meeting was used to encourage discussion and information sharing and to ensure that the public had opportunities to speak with representatives of the GSA. Informational poster displays about the Proposed Action and alternatives, project background, and ways to provide scoping comments were provided at the meeting. Additional meeting materials available at the public scoping meeting included:

- Sign-in sheets;
- Comment forms; and
- Meeting handouts (information on the project and NEPA process).

The posters, comment form, handouts, and sign-in sheets from the scoping meeting are included in Appendix E, F, G, and H, respectively.

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## CHAPTER 5 PUBLIC SCOPING COMMENTS

GSA invited comments for scoping of this EIS during the scoping period (July 14 – August 22, 2022), including on the key topics that should be covered in the EIS; examples of potential adverse and beneficial impacts from the proposed project; and any other additional, relevant information available.

### 5.1 COLLECTING COMMENTS

Comments were submitted to GSA using comment forms, letters, and emails.

### 5.2 SUMMARY OF COMMENTERS

Comments were indexed based on the source, or commenter. Commenters included federal, state, or local agencies (A) and members of the public (P). Each comment was cataloged with a code based on the source of the comment and the order in which it was received (e.g., P3 was the third comment received by a member of the public). A total of 22 unique commenters provided input during the scoping period. Appendix I includes an index of commenters by type (i.e., agency, public) and dates comments were received.

### 5.3 ISSUES IDENTIFIED DURING SCOPING

Each concern or question associated with a commenter was categorized by resource area. Table 1 provides a summary of the comments and location in the EIS, if addressed and rationale, if not addressed. In addition to the comments captured in Table 1, one commenter submitted a comment expressing general support for the project and another commenter submitted a comment querying GSA regarding realty business opportunities for the project. The U.S. Geologic Survey responded on July 14, 2022 indicating they had no comments to provide. One comment letter regarding the public scoping process was received on August 24, 2022, after the end of the scoping comment period; however, the comments in the letter were considered by GSA.

**Table 1. Commenters and Comments by Category**

Comments*	Addressed in EIS?	If yes, location in EIS. If no, rationale.
<b><i>Purpose and Need (1 commenter; 1 comment)</i></b>		
<p>One commenter (P) noted that the project should include a contingency to allow for rail transport, both in terms of cargo and passenger, in the future.</p>	<p>No</p>	<p>There are no current plans for development of railroad infrastructure at the RHC LPOE or in the City of Douglas, nor is the development of rail infrastructure within the mission or authority of GSA; therefore, consideration of rail transport in the NEPA analysis would be highly speculative and not reasonably foreseeable as defined at 40 CFR 1508.1(aa). See Section 1.2 of the EIS for discussion of the Purpose and Need for the Proposed Action.</p>
<b><i>Public Scoping Process (1 commenter; 4 comments) [Note: Comment letter received outside of scoping period.]</i></b>		
<ul style="list-style-type: none"> <li>• One commenter (P) noted that the FR NOI document and a couple related newspaper articles lacked detail and that information relating to potential public impacts was hard to find or absent.</li> <li>• The commenter noted that there was lack of supplemental resources (e.g., a website with project information or project description with possible concerns identified) and no other way to access the meeting other than attending in-person.</li> <li>• The commenter noted that there was lack of time for public comments, agencies usually offer at least 45 days for a scoping period, and the comment period should be re-opened for 45 more days.</li> <li>• The commenter noted that the EIS should be presented in a clear manner, the location, timeline, potential impacts and there should be a website with maps and photos.</li> </ul>	<p>N/A</p>	<p>The NOI provided information as to what resources may be impacted and that the EIS will consider (reference the third paragraph under ‘Alternatives Under Consideration’). Because environmental analysis had not been initiated at the time of the issuance of the NOI, it was determined to be premature and therefore not appropriate, as specified at 40 CFR 1501.9, to include details about environmental impacts. Impacts from the Proposed Action are detailed in Chapter 3 of the Draft EIS, which is being made available for public review for 45 days.</p> <p>GSA provided the public with currently available information regarding the Proposed Action so as to solicit possible issues of concern regarding the project, in accordance with the intent of the scoping process. Further, the NOI, and this Draft EIS, were written in accordance with 40 CFR 1500.4(f) and 40 CFR 1502.8 and contains “plain language” consistent with other NOIs and EISs issued by GSA for Land Ports of Entry projects.</p> <p>GSA did establish a project website for this project; however, the website was not live in time to meet GSA’s submittal deadline to the Federal Register</p>

Comments*	Addressed in EIS?	If yes, location in EIS. If no, rationale.
		<p>for the NOI. Refer to Section 1.3 of the EIS for project websites; these websites will be included in future notices. Poster displays and meeting handouts that were presented at the public meeting are available on those websites and in this Scoping Report.</p> <p>GSA also coordinated extensively with the City on promoting public awareness of the scoping period and scoping meeting, who in turn promoted the announcements through their website and social media channels (see Sections 3.4 and 3.5 of this Scoping Report)</p> <p>CEQ NEPA regulations do not prescribe a minimum number of days to conduct scoping. The GSA NEPA Desk Guide indicates that “GSA can choose how long to accept comments on the scope of a forthcoming EIS; usually no shorter than 30 days, often 45 or 90, depending on the project scope.” The scoping period was open from July 14, 2022, to August 22, 2022, for a total of 40 days. This scoping period length is consistent with other recent Land Port of Entry NEPA actions at San Luis, AZ as well as Otay Mesa, CA.</p>
<b>Proposed Action (4 commenters; 4 comments)</b>		
<p>One commenter (A) recommended that the EIS describe all the building and area sustainable development considerations that would be included in the Proposed Action and alternatives, including footprints for energy, water, and resource conservation, and renewable energy measures, noting that the Department of Energy’s Solar Energy Potential 12 map indicates that the project is located in one of the sunniest in the mainland United States and that the project would be an opportunity to deploy renewable energy technology to directly supply the LPOE facility’s electricity demand for decades.</p>	<p>Yes</p>	<p>See Sections 2.1, 3.3.2.5 and 3.6.2.5 of the EIS.</p>
<p>Two commenters (P) noted that any new building should be planned with sustainability in mind, such as designing to use solar power or be ready for potentially retrofitting for solar power and using sustainable building materials.</p>	<p>Yes</p>	<p>See Section 2.1 of the EIS.</p>

Comments*	Addressed in EIS?	If yes, location in EIS. If no, rationale.
One commenter (P) asked whether there would be an opportunity for public input on the selection of the design architect.	Yes	There are no public outreach requirements associated with selection of a design architect for the firm.
<b>Alternatives (1 commenter; 2 comments)</b>		
<ul style="list-style-type: none"> <li>One commenter (P) expressed opposition to GSA's project and noted that in a 1994 proposal for a James Ranch Road project, an area of 300-acres was purchased to serve as a landfill and that the area primarily falls in a flood zone.</li> <li>The commenter expressed concern whether a cost/benefit analysis or feasibility study was conducted before any decisions were made. The commenter noted that a governmental complex combining the U. S. Border Patrol Station, with a new port of entry on Kings Highway would make more sense as there is existing infrastructure available and that international border properties could be attained by purchase or by exercising eminent domain.</li> </ul>	Yes	See Section 3.6 of the EIS for a discussion of floodplains. The proposed Commercial LPOE is not located in a 100-year or 500-year floodplain. See Section 2.1.1 for the siting criteria for the proposed Commercial LPOE and Section 2.4 for Alternatives Considered but Dismissed, including a project location on Kings Highway. GSA completed a Feasibility Study in 2019 for the project and is preparing this EIS to inform the decision as to whether to move forward with construction of the proposed Commercial LPOE. Alternatively, GSA may elect to select the No Action Alternative or cancel the project.
<b>Cultural Resources (1 commenter; 2 comments)</b>		
<ul style="list-style-type: none"> <li>One commenter (A) recommended that GSA's Regional Historic Preservation Officer engage in early consultation with the Arizona State Historic Preservation Office to identify historical resources for evaluation and preservation in the Proposed Action.</li> <li>The commenter also recommended that GSA engage their Tribal Historic Preservation Office for early consultation with tribal governments for any cultural resources that may exist in the proposed project area, noting the proximity of the Pascua Yaqui, Tohono O'odham, San Carlos Apache Tribes.</li> </ul>	<ul style="list-style-type: none"> <li>Yes</li> <li>Yes</li> </ul>	<ul style="list-style-type: none"> <li>See Section 3.2 and Appendix B of the EIS.</li> <li>See Appendix B of the EIS.</li> </ul>
<b>Air Quality and Greenhouse Gas Emissions (1 commenter; 6 comments)</b>		
<ul style="list-style-type: none"> <li>One commenter (A) recommended that GSA coordinate closely with ADEQ and that the Draft EIS provide a robust air quality impact analysis, including ambient air conditions (baseline or existing conditions), NAAQS criteria pollutant nonattainment areas, and potential air quality impacts of the Proposed Action, including indirect and cumulative impacts.</li> <li>The commenter requested that the EIS provide estimates of emissions of criteria pollutants from the proposed project and discuss the timeframe for release of these emissions over the construction period of the project; specify emission sources by pollutant from mobile sources, stationary sources, and ground</li> </ul>	<ul style="list-style-type: none"> <li>Yes</li> <li>Yes</li> </ul>	<ul style="list-style-type: none"> <li>See Sections 3.3 and 4.4, and Chapter 8 of the EIS.</li> <li>See Sections 3.3.2.4 and 3.3.2.6 of the EIS.</li> </ul>

Comments*	Addressed in EIS?	If yes, location in EIS. If no, rationale.
<p>disturbance and use source-specific information to identify appropriate mitigation measures and areas in need of the greatest attention.</p> <ul style="list-style-type: none"> <li>• The commenter requested that the EIS include a list of all mitigation measures to be implemented as part of the construction emissions mitigation plan developed for the project and provided a list of recommended mitigation measures for inclusion in the construction emissions mitigation plan, including fugitive dust source controls; mobile and stationary source controls; and administration controls.</li> <li>• The commenter noted that for any criteria pollutants in the air basin of the project area where the air quality status is in nonattainment or attainment-maintenance, to complete a general conformity applicability analysis (i.e., a comparison of direct and indirect emissions for each alternative with <i>de minimis</i> thresholds of 40 CFR 93.153). The commenter recommended to include a draft general conformity determination in the Draft EIS to fulfill the public participation requirements of 40 CFR 93.156.</li> <li>• The commenter noted that consideration be made for the addition of electrical connections to power commercial vehicles, such as refrigeration trucks, to prevent spoilage while discouraging engine idling during secondary inspections at the new LPOE for COVs.</li> <li>• The commenter noted that the <i>National Climate Assessment</i> describes climate effects for the Southwest region that may impact infrastructure such as GSA's RHC LPOE project; the commenter recommends the EIS includes a climate risk analysis; identification of specific commitments to implement climate adaptation, including applicable actions noted in the <i>National Climate Assessment</i> for the Southwest Region; and to commit to referencing the best available science and national guidance on climate adaptation.</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> <li>• Yes</li> <li>• Yes</li> <li>• Yes</li> </ul>	<ul style="list-style-type: none"> <li>• See Section 3.3.2.6 of the EIS.</li> <li>• See Section 3.3 and Appendix C of the EIS.</li> <li>• See Section 3.3.2.6 of the EIS.</li> <li>• See Sections 3.3.2.5 and 3.3.2.6 of the EIS.</li> </ul>
<b>Water Resources (2 commenters; 2 comments)</b>		
<ul style="list-style-type: none"> <li>• One commenter (A) noted that aquatic resources such as wetlands and riparian areas are high priority and recommended, therefore, that the Draft EIS specifically include the following analyses or descriptions: description of impacts under individual or nationwide permits authorizing the discharge of fill or dredge materials to waters of the U.S.; maps, identifying wetlands and regional water features; identify the direct, indirect, and cumulative impacts to wetlands in the geographic scope, including impacts from changes in hydrology even if these wetlands are spatially removed from the construction footprint; include the indirect impacts to wetlands from loss of hydrology from water diversion/transfers; cumulative impacts to wetlands from future development scenarios based on</li> </ul>	<p>Yes</p>	<p>See Section 3.6 of the EIS.</p>

Comments*	Addressed in EIS?	If yes, location in EIS. If no, rationale.
population and growth estimates; and for wetlands potentially impacted by project alternatives, include wetland delineations and functional analysis.		
One commenter (P) expressed concern whether there would be enough water to develop the new port.	Yes	See Sections 3.6.2 and 3.10.2 of the EIS.
<b>Biological Resources (2 commenters; 4 comments)</b>		
<ul style="list-style-type: none"> <li>• One commenter (A) noted that per the Endangered Species Act and its implementing regulations (50 CFR 402 et seq.), GSA is required to consult with the U.S. Fish and Wildlife Service about potential effects to listed species from project activities and recommended that a complete list of species and critical habitats that may occur within the project area should be obtained from the Information for Planning and Consultation (IPaC) website and that important considerations should be given to international species whose distributions occur in both Mexico and the U.S. and could experience effects on both sides of the international border. The same commenter noted that direct and indirect effects (including effects of interdependent and interrelated actions) and cumulative effects (as described under 50 CFR 402) to listed species should be clearly addressed in the EIS.</li> <li>• The commenter noted that the Draft EIS consider species protected under the Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703-712) and the Bald and Golden Eagle Protection Act (Eagle Act) (16 U.S.C. 668 et seq.). The commenter noted that if a bald eagle or golden eagle nest occurs in or near the proposed project area, the Arizona Ecological Services Office (with the U.S. Fish and Wildlife Service) should be contacted and an evaluation must be performed to determine if the project is likely to disturb or harm eagles and if an Eagle Act permit may be needed.</li> <li>• The commenter recommended to seek additional information and coordinate the project with the Arizona Game and Fish Department and noted that information on known species detections, special status species, and Arizona species of greatest conservation need can be found by using their Online Environmental Review Tool, administered through the Heritage Data Management System and Project Evaluation Program (<a href="https://www.azgfd.com/wildlife/planning/projevalprogram/">https://www.azgfd.com/wildlife/planning/projevalprogram/</a>).</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> <li>• Yes</li> <li>• Yes</li> </ul>	<ul style="list-style-type: none"> <li>• See Sections 3.7, 4.7, and Appendix B of the EIS.</li> <li>• See Section 3.7.1 of the EIS.</li> <li>• See Sections 3.7, 4.7, and Chapter 8 of the EIS.</li> </ul>
<ul style="list-style-type: none"> <li>• One commenter (A) noted that the EIS should identify all petitioned and listed threatened and endangered species and critical habitat that might occur within the project area and quantify which species or critical habitat might be directly, indirectly, or cumulatively affected by each alternative. The commenter recommended coordination with the U.S. Fish and Wildlife Service to assure that the Proposed Action and alternatives account for the following: river restoration, flow and channel modifications, wetlands, and habitat fragmentation regarding</li> </ul>	Yes	See Sections 3.7 and Appendix B of the EIS



Comments*	Addressed in EIS?	If yes, location in EIS. If no, rationale.
species' habitat requirements; Migratory Bird Treaty Act compliance; and protection from invasive species.		
<b>Transportation and Traffic (7 commenters; 7 comments)</b>		
Six commenters (P) expressed the same concern about the movement of toxic and hazardous materials and large mining equipment through the City of Douglas and requested that an enforceable transportation action plan (which should include restrictions to, but not limited to, travel on Highway 80 between Highway 191 east to Washington Avenue) be included in the EIS.	Yes	See Section 3.8.1 of the EIS.
One commenter (P) expressed concern about the project's impact on commercial truck traffic through the region and damage to roadways and noted that there are no continuous 4-lane routes to connect to the interstate road system from Douglas. The commenter asked whether a study been done to determine which are the likely routes of travel for increased commercial traffic.	Yes	See Section 3.8.2 of the EIS.
<b>Socioeconomics (1 commenter; 1 comment)</b>		
One commenter (P) expressed concern that many warehouses for commercial traffic are located directly adjacent to the existing port and that the new commercial port would complicate things for these warehouses, requiring them to relocate.	Yes	See Sections 3.4.2.3 and 3.11.2.3 of the EIS.
<b>Environmental Justice (1 commenter; 3 comments)</b>		
<ul style="list-style-type: none"> <li>• One commenter (A) recommended using EPA's EJScreen analysis and consider EJScreen information for the block group(s) which contains the proposed action(s) and the impacted radius around those areas and to consider additional information in the environmental justice analysis to supplement EJScreen outputs. The commenter noted the results of a preliminary analysis conducted using the EJScreen and asked that the EIS verify the results and engage local communities to provide input on the proposed project and identify opportunities to mitigate localized air pollution experienced by adjacent communities from the existing facility.</li> <li>• The commenter also noted that there may be additional settlements along West Puzzi Ranch Road near the proposed Commercial LPOE site that should be included in community engagement efforts.</li> <li>• The commenter recommended the following items for the EIS: applying the "Environmental Justice Interagency Working Group Promising Practices for EJ Methodologies in NEPA Reviews" report, or the Promising Practices Report, to this project; characterizing project site(s) with specific information or data related to EJ concerns; describing potential EJ concerns for all EJ Indexes at or above the 80th percentile in the state and/or nation; describing block groups which contain</li> </ul>	<ul style="list-style-type: none"> <li>• Yes</li> <li>• Yes</li> <li>• Yes</li> </ul>	<ul style="list-style-type: none"> <li>• See Section 3.12 of the EIS.</li> <li>• See Chapter 8 of the EIS.</li> <li>• See Section 3.12 of the EIS.</li> </ul>

Comments*	Addressed in EIS?	If yes, location in EIS. If no, rationale.
the proposed action and at a minimum, a one-mile radius around those areas; describing individual block groups within the project area in addition to an area wide assessment; and supplementing data with other tools and local knowledge.		
<b>Human Health and Safety (8 commenters; 9 comments)</b>		
One commenter (P) asked about the proximity of the former Phelps-Dodge smelter site in relation to the project LPOEs and, referring to GSA's NEPA Desk Guide (Section 3.5.1.3), asked for a definition of "near" in relation to toxic and hazardous materials.	Yes	Section 3.13.1.1 of the EIS discusses the region of influence for Human Health and Safety; this section discusses the locations where human health and safety are reasonably expected to be affected by the Proposed Action from toxic and hazardous materials. The region of influence for this resource is defined as the proposed LPOE footprints and those areas directly adjacent to the project areas, as these are the areas where it is reasonably foreseeable, as defined at 40 CFR 1508.1(aa), to be affected by the Proposed Action. The definition of "near" in the EIS varies based on each specific resource area's region of influence. See the below response regarding consideration of the Phelps-Dodge smelter site in the EIS. As the smelter site falls within the region of influence for water resources and air quality and greenhouse gases, the potential for the smelter site to transport contaminants by water, or to soils via air ground transport, to the proposed LPOE footprints are considered in Sections 3.6 and 3.13 of the EIS.
Eight commenters (P) expressed the same concern regarding the former Phelps-Dodge smelter site and requested that a Technologically Enhanced Naturally Occurring Radioactive Materials (TENORM) study of all the parcels associated with the smelter site be included in the EIS due to the proximity and change in land use and development patterns that would result from the project and that appropriate measures be taken to return the site to pre-smelter conditions.	Yes	GSA conducted a detailed analysis of existing site conditions within the region of influence for potential sources of contamination using existing and available data including the USEPA Superfund Site online database and the ADEQ VRP online database. GSA did not identify any radiation concerns from the former Phelps-Dodge smelter site to warrant further investigation within the proposed LPOE footprints. See Sections 3.13.1.3 and Chapter 4 of the EIS.  The former Phelps-Dodge smelter site, is not within the proposed LPOE footprints and is located approximately 0.7 and 3.5 miles from the RHC LPOE and proposed Commercial LPOE,

Comments*	Addressed in EIS?	If yes, location in EIS. If no, rationale.
		respectively. The Proposed Action would not disturb or alter the smelter site in any way. Potential impacts from ongoing presence of the Phelps-Dodge smelter site on local water resources or soils are discussed in Sections 3.6 and 3.13 of the EIS. Future development that may result from development of the Commercial LPOE is discussed in Sections 3.4 and 3.11. Exact locations of any future development are unknown and not within GSA's control or authority. Remediation of the parcels are not within the scope of GSA's Proposed Action or within GSA's authority.
<b>Cumulative Impacts (1 commenter; 1 comment)</b>		
One commenter (A) noted that there is no paved road access to the proposed Commercial LPOE site nor is there any information about when the Mexican authorities anticipate constructing a facility and recommended that the EIS describe any reasonably foreseeable actions associated with the project, specifically any other future planned pedestrian or other complete street projects planned by the City of Douglas and any road projects planned along Highway 80 or North Kings Highway by the Arizona Department of Transportation.	Yes	See Chapters 2 and 4 of the EIS.

\*Note: Commenters included federal, state, or local agencies (A) and members of the public (P)

Acronyms: ADEQ – Arizona Department of Environmental Quality; CBP – Customs and Border Protection; CFR – Code of Federal Regulations; COV – commercially-owned vehicle; EIS – Environmental Impact Statement; EJ – environmental justice; FR – *Federal Register*; GSA – General Services Administration; LEED – Leadership in Energy and Environmental Design; LPOE – land port of entry; NAAQS – National Ambient Air Quality Standards; NEPA – National Environmental Policy Act; NOI – Notice of Intent; RHC LPOE – Raul Hector Castro Land Port of Entry

## CHAPTER 6 LIST OF PREPARERS

GSA prepared the various scoping materials and report with contractual assistance from Potomac-Hudson Engineering, Inc. (PHE). The following individuals were primarily responsible for the development and review of the scoping materials and report:

- Osmahn Kadri (GSA) – NEPA Program Manager and EIS Project Manager
- Paul DiPaolo (PHE) – EIS Project Manager/Reviewer
- Cynthia Ong (PHE) – Environmental Consultant/Author
- Pam Lawson (PHE) – Editor

**APPENDIX A: FEDERAL REGISTER NOTICE**

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that are considered in acting on the applications are set forth in paragraph 7 of the Act (12 U.S.C. 1817(j)(7)).

The public portions of the applications listed below, as well as other related filings required by the Board, if any, are available for immediate inspection at the Federal Reserve Bank(s) indicated below and at the offices of the Board of Governors. This information may also be obtained on an expedited basis, upon request, by contacting the appropriate Federal Reserve Bank and from the Board's Freedom of Information Office at <https://www.federalreserve.gov/foia/request.htm>. Interested persons may express their views in writing on the standards enumerated in paragraph 7 of the Act.

Comments regarding each of these applications must be received at the Reserve Bank indicated or the offices of the Board of Governors, Ann E. Misback, Secretary of the Board, 20th Street and Constitution Avenue NW, Washington DC 20551-0001, not later than July 29, 2022

A. *Federal Reserve Bank of Dallas* (Karen Smith, Director, Applications) 2200 North Pearl Street, Dallas, Texas 75201-2272:

1. *The Katherine A. Satel 2021 Family Trust One, The Katherine A. Satel 2021 Family Trust Two, the Emily G. Satel 2021 Family Trust One, the Emily G. Satel 2021 Family Trust Two, the Caroline M. Satel 2021 Family Trust One, the Caroline M. Satel 2021 Family Trust Two, 14 trusts fbo minor children, and Jefferson Bank, as trustee for all of the forementioned trusts, all of San Antonio, Texas;* to join the McSween Family Control Group, a group acting in concert, to retain voting shares of Jefferson Bancshares, Inc., and thereby retain voting shares of Jefferson Bank, both of San Antonio, Texas.

Board of Governors of the Federal Reserve System.

Michele Taylor Fennell,

Deputy Associate Secretary of the Board.

[FR Doc. 2022-15088 Filed 7-13-22; 8:45 am]

**BILLING CODE**

**GENERAL SERVICES ADMINISTRATION**

[Notice-PBS-2022-03; Docket No. 2022-0002; Sequence No. 17]

**Notice of Intent To Prepare an Environmental Impact Statement (EIS) for the Expansion and Modernization of the Raul Hector Castro Land Port of Entry and Proposed Commercial Land Port of Entry in Douglas, Arizona**

**AGENCY:** Public Buildings Service (PBS), General Services Administration (GSA).

**ACTION:** Notice of intent; announcement of meeting.

**SUMMARY:** Pursuant to the requirements of the National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality Regulations, and the GSA Public Buildings Service NEPA Desk Guide, GSA is issuing this notice to advise the public that an Environmental Impact Statement (EIS) will be prepared to analyze potential environmental impacts from the expansion and modernization of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) and construction of a new commercial LPOE in Douglas, Arizona to address traffic safety and hazard concerns resulting from space constraints, inefficient traffic flows, and increasing traffic demands.

**DATES:** *Public Scoping*—The Public Scoping Period will begin on July 14th, 2022. Interested parties are encouraged to provide written comments regarding the scope of the EIS. Written comments must be received by August 22, 2022 (see **ADDRESSES** section for where to submit comments).

*Meeting Date*—A public scoping meeting will be held on Thursday, August 11, 2022, from 4 p.m. to 6 p.m. PDT. The meeting will be held in the Douglas Visitor Center (see **ADDRESSES** section for location address), where GSA will meet with governmental and public stakeholders to explain the project and obtain input on the scoping of the project. The meeting will be an informal open house, where visitors may come, receive information, and provide written comments.

**ADDRESSES:** *Public Scoping Comments*—You may send comments, identified by Notice PBS-2022-03, by one of the following methods:

- *Email:* [Osmahn.Kadri@gsa.gov](mailto:Osmahn.Kadri@gsa.gov). Include Notice PBS-2022-03 in the subject line of the message.
- *Mail:* Attention: Osmahn Kadri, NEPA Project Manager, U.S. General Services Administration, c/o Potomac-Hudson Engineering, Inc., 77 Upper Rock Circle, Suite 302, Rockville MD 20850.

*Meeting Location*—A public scoping meeting will be held at the Douglas Visitor Center, 345 16th St, Douglas, AZ 85607.

**FOR FURTHER INFORMATION CONTACT:** Osmahn Kadri, 415-522-3617, [Osmahn.Kadri@gsa.gov](mailto:Osmahn.Kadri@gsa.gov).

**SUPPLEMENTARY INFORMATION:**

**Background**

The Raul Hector Castro Land Port of Entry (RHC LPOE) is a full-service, multi-modal port, where Customs and Border Protection (CBP) currently inspects commercially-owned vehicles (COVs), privately-owned vehicles (POVs), and pedestrians at the U.S.-Mexico border in Douglas, Arizona. The RHC LPOE has been operating since 1914 and construction of the current facility began in the 1930s. The existing Main Building and the Garage were built in 1933 and are listed on the National Register of Historic Places.

The current facilities at the RHC LPOE no longer function adequately given the site constraints, steady increase in traffic, and outdated facilities and technologies. The interaction between COVs, POVs, and pedestrian traffic is also a concern at the RHC LPOE. Inadequate pathways and separations between traffic types cause safety and security issues for CBP officers and the general public. As downtown Douglas is located just north of the RHC LPOE, traffic congestion and trucks hauling hazardous materials through the city are also a concern in the community.

To improve public and worker safety and to increase the capacity at the RHC LPOE, the proposed expansion and modernization would comprise of: (1) the construction of a new port facility dedicated to COVs; and (2) expanding and modernizing the existing RHC LPOE facilities to serve as a non-commercial facility for the POVs and pedestrians. GSA intends to prepare an EIS to analyze the potential environmental impacts resulting from the proposed construction of a new commercial LPOE and expansion and modernization of the RHC LPOE.

The project would first involve the construction of a new commercial facility located approximately five miles west of the existing RHC LPOE facilities. Subsequently, expansion and modernization of the existing RHC LPOE facilities would begin and would require a multi-phase construction plan to ensure that operations are continuous and that safety and security of the RHC LPOE is maintained. The possible phasing during the expansion and modernization to the existing RHC LPOE includes:

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Federal Register / Vol. 87, No. 134 / Thursday, July 14, 2022 / Notices

- Phase 1.1: After a New Standalone Commercial Facility is built, transfer commercial operations to the new facility. Acquire land to north, vacate existing stores, and demolish vacated facilities associated with commercial activities.

- Phase 1.2: Build new Non-Commercial Inspection area, Main Building, Public Facing/Trusted Traveler Building, and Family Unit/Unaccompanied Juvenile Processing Facility.

- Phase 2.1: Transfer all existing Non-Commercial Operations to new Non-Commercial Facilities. Transfer existing Historic Main Building to new Main Building. Demolish Non-Commercial Inspection Lanes and prepare existing port-owned Parking Lot for upgrades.

- Phase 2.2: Build additional Main Building Parking and Outbound Facilities. Upgrade Overflow Parking Lot as needed. Remodel, relocate, or demolish existing Historic Main Building and Garage.

- Phase 3.1: Transfer existing outbound operations to new Outbound Facilities. Demolish existing Outbound Lanes. If remodeled, occupy Historic Main Building and Garage.

- Phase 3.2: Improve existing outbound Pedestrian Walkway.

#### Alternatives Under Consideration

The EIS will consider two “action” alternatives and one “no action” alternative. Alternative 1 consists of building a new Standalone Commercial Facility for COVs and expanding and modernizing the existing RHC LPOE as a non-commercial facility for POVs and pedestrians, as described in the above Phases. Alternative 2 includes expanding and modernizing the existing RHC LPOE only and continuing to utilize the LPOE for both commercial and non-commercial functions. Sub-alternatives may be considered for each alternative with respect to the management of the historic structures located at the existing RHC LPOE.

The “no action” alternative assumes that GSA would not expand and modernize the RHC LPOE or construct a new commercial LPOE and that operations would continue under current conditions.

The EIS will address the potential environmental impacts of the proposed alternatives on environmental resources including aesthetics, air quality during construction and operation, geology and soils, hazards and hazardous materials, hydrology and water quality, cultural resources, biological resources, land use, noise during construction and operation, utilities, and traffic. The EIS will also address the socioeconomic

effects of the project as well as impacts on Environmental Justice populations.

#### Scoping Process

The views and comments of the public are necessary in helping to determine the scope and content of the environmental analysis. The scoping process will be accomplished through a public scoping meeting, direct mail correspondence to appropriate federal, state, and local agencies, and to private organizations and citizens who have previously expressed, or are known to have, an interest in the project.

A public scoping meeting will be announced in the local newspaper, the *Herald Review*. Agencies and the public are encouraged to provide written comments regarding the scope of the EIS. See information provided above for dates, addresses, and contact information.

**Russell Larson,**

*Director, Portfolio Management Division,  
Pacific Rim Region, Public Buildings Service.*  
[FR Doc. 2022-14815 Filed 7-13-22; 8:45 am]

**BILLING CODE 6820-YF-P**

#### DEPARTMENT OF HEALTH AND HUMAN SERVICES

##### Centers for Disease Control and Prevention

[CDC-2022-0066; Docket Number NIOSH-346]

##### Draft National Institute for Occupational Safety and Health (NIOSH) Healthcare Personal Protective Technology (PPT) Targets for 2020 to 2030; Extension of Comment Period

**AGENCY:** Agency: The Centers for Disease Control and Prevention (CDC), Department of Health and Human Services (HHS).

**ACTION:** Extension of public comment period.

**SUMMARY:** The National Institute for Occupational Safety and Health (NIOSH) in the Centers for Disease Control and Prevention (CDC), an Operating Division of the Department of Health and Human Services (HHS), announces the extension of the comment period to obtain public comment on draft personal protective technology (PPT) targets for 2020 to 2030.

**DATES:** The comment period is extended through August 31, 2022.

**ADDRESSES:** You may submit comments, identified by CDC-2022-0066 and

docket number NIOSH-346, by either of the following two methods:

- *Federal eRulemaking Portal:* <https://www.regulations.gov>. Follow the instructions for submitting comments.

- Mail: National Institute for Occupational Safety and Health, NIOSH Docket Office, 1090 Tusculum Avenue, MS C-34, Cincinnati, Ohio 45226-1998. **FOR FURTHER INFORMATION CONTACT:** Dr. Susan M. Moore, NIOSH NPPTL, Building 141, 626 Cochran Mill Road, Pittsburgh, PA 15236; Telephone: 412-386-6111.

**SUPPLEMENTARY INFORMATION:** On May 16, 2022, NIOSH published a notice in the *Federal Register* (87 FR 29748) announcing a draft document entitled Draft NIOSH Healthcare Personal Protective Technology (PPT) Targets for 2020 to 2030 available for public comment. Written comments were to be received by July 15, 2022. In response to a request from the public, NIOSH is extending the public comment period to August 31, 2022.

**John J. Howard,**

*Director, National Institute for Occupational Safety and Health, Centers for Disease Control and Prevention.*

[FR Doc. 2022-15084 Filed 7-13-22; 8:45 am]

**BILLING CODE 4163-18-P**

#### DEPARTMENT OF HEALTH AND HUMAN SERVICES

##### Administration for Children and Families

##### Proposed Information Collection Activity; Racial and Ethnic Disparities In Human Services Analysis Execution Project (New Collection)

**AGENCY:** Office of Planning, Research, and Evaluation, Administration for Children and Families, Health and Human Services (HHS).

**ACTION:** Request for public comments.

**SUMMARY:** The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) is proposing to collect data to explore how one state's changes to Temporary Assistance for Needy Families (TANF) policies and services in response to the COVID-19 pandemic were experienced by different racial and ethnic groups in that state. The goal is to obtain an in-depth understanding of how TANF participants of different racial and ethnic backgrounds experienced these policy and programmatic changes by comparing those experiences within one state, and to assess whether those changes may have helped to ameliorate challenges



**APPENDIX B: NEWSPAPER AFFIDAVITS**

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**Herald Review newspaper advertisements (English) – July 20, August 3, and August 7, 2022**



**AFFIDAVIT OF PUBLICATION**

STATE OF ARIZONA       )  
  :SS.  
County of Cochise        )

Nancy Bernard, being first duly sworn, deposes and says that: (he) (she) is the Legal Advertising Representative of the Herald/Review Media newspaper printed and published three days a week in the City of Sierra Vista, County of Cochise, State of Arizona that this affidavit is Page 1 of 2 with the full text of the sworn-to notice set forth on the pages that follow, and the hereto attached was printed and published correctly in the regular and entire issue of said Herald/Review Media:

**PUBLICATION DATES:**  
20 Jul 2022

**Notice ID:** EKafA98im9wYmpgDJooG  
**Notice Name:** Douglas Scoping (EN) (1 of 3)

**Request of:**  
phe  
77 Upper Rock Circle  
by: cynthia ong

\_\_\_\_\_  
Legal Advertising Representative

**VERIFICATION**  
STATE OF ARIZONA  
COUNTY OF COCHISE



Signed or attested before me on this  
2nd day of August, 2022  
  
\_\_\_\_\_  
Notary Public  
**My Commission Expires:** 8/12/2025



**AFFIDAVIT OF PUBLICATION**

STATE OF ARIZONA       )  
  :SS.  
County of Cochise        )

Nancy Bernard, being first duly sworn, deposes and says that: (he) (she) is the Legal Advertising Representative of the Herald/Review Media newspaper printed and published three days a week in the City of Sierra Vista, County of Cochise, State of Arizona that this affidavit is Page 1 of 2 with the full text of the sworn-to notice set forth on the pages that follow, and the hereto attached was printed and published correctly in the regular and entire issue of said Herald/Review Media:

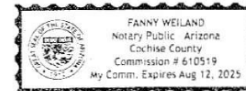
**PUBLICATION DATES:**  
3 Aug 2022, 7 Aug 2022

**Notice ID:** NKqC3yBijkEKy3BLgedF  
**Notice Name:** Douglas Scoping (EN) (2 and 3 of 3)

**Request of:**  
phe  
77 Upper Rock Circle  
by: cynthia ong

\_\_\_\_\_  
Legal Advertising Representative

**VERIFICATION**  
STATE OF ARIZONA  
COUNTY OF COCHISE



Signed or attested before me on this  
11th day of August, 2022  
  
\_\_\_\_\_  
Notary Public  
**My Commission Expires:** 8/12/2025

**PUBLIC NOTICE**

**Public Scoping Meeting for the Raul Hector Castro Land Port of Entry Environmental Impact Statement**

The U.S. General Services Administration (GSA) is beginning preparation of an Environmental Impact Statement (EIS) to analyze the potential impacts resulting from the expansion and modernization of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) and the proposed construction of a new commercial LPOE in Douglas, Arizona. The RHC LPOE is owned and managed by GSA and operated by the U.S. Department of Homeland Security's Customs and Border Protection (CBP). The new commercial LPOE would address traffic safety and hazard concerns resulting from space constraints, inefficient traffic flows, and increasing traffic demands at the RHC LPOE.

The RHC LPOE is a port of entry for vehicles and pedestrians crossing the U.S.-Mexico border, between Douglas, Arizona and Agua Prieta, Sonora in Mexico. The port is a full-service, multi-modal facility where CBP officers inspect commercially-owned vehicles (COVs), privately-owned vehicles (POVs), and pedestrians. The port has been operating since 1914, with existing facilities constructed in the 1930s. Due to steady increases in traffic, poor pedestrian infrastructure, lack of separations between traffic types (COV, POV, and pedestrian), and outdated facilities and technologies, the facilities at the RHC LPOE no longer function adequately and pose safety and security risks for CBP officers and the general public. The existing RHC LPOE has spatial constraints, with limited interior space for offices and processing and limited opportunity for expansion within its current footprint. Additionally, the City of Douglas has expressed concerns about commercial traffic traveling through its downtown area.

The public is encouraged to attend and participate in the scoping meeting. The purpose of this meeting is to provide project information and to gauge public input on what resources and issues are important, which will help determine the scope and content of the EIS. The scoping meeting will occur on Thursday, August 11, 2022, from 4 to 6 pm, at:

Douglas Visitor Center,  
345 16th Street, Douglas,  
Arizona, 85607

Comments must be received by August 22, 2022 and may be submitted at the scoping meeting, by email to [osmahn.kadri@gsa.gov](mailto:osmahn.kadri@gsa.gov) (include "Douglas Scoping Comment" in subject line), or mailed to:

Attention: Osmahn Kadri,  
NEPA Project Manager  
General Services Administration  
c/o Potomac-Hudson Engineering, Inc.  
77 Upper Rock Circle, Suite 302  
Rockville, MD 20850

For more information or if special assistance is needed to attend and participate in the public scoping meeting, please contact Osmahn Kadri, GSA NEPA Project Manager, at 415-522-3617.  
**Publish: July 20, 2022**

**PUBLIC NOTICE**

**Public Scoping Meeting for the Raul Hector Castro Land Port of Entry Environmental Impact Statement**

The U.S. General Services Administration (GSA) is beginning preparation of an Environmental Impact Statement (EIS) to analyze the potential impacts resulting from the expansion and modernization of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) and the proposed construction of a new commercial LPOE in Douglas, Arizona. The RHC LPOE is owned and managed by GSA and operated by the U.S. Department of Homeland Security's Customs and Border Protection (CBP). The new commercial LPOE would address traffic safety and hazard concerns resulting from space constraints, inefficient traffic flows, and increasing traffic demands at the RHC LPOE.

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Douglas Visitor Center,  
345 16th Street, Douglas, Arizona, 85607

Comments must be received by August 22, 2022 and may be submitted at the scoping meeting, by email to [osmahn.kadri@gsa.gov](mailto:osmahn.kadri@gsa.gov) (include "Douglas Scoping Comment" in subject line), or mailed to:

Attention: Osmahn Kadri  
NEPA Project Manager  
General Services Administration  
c/o Potomac-Hudson Engineering, Inc.  
77 Upper Rock Circle, Suite 302  
Rockville, MD 20850

For more information or if special assistance is needed to attend and participate in the public scoping meeting, please contact Osmahn Kadri, GSA NEPA Project Manager, at 415-522-3617.  
**Publish: July 20, 2022**

**PUBLIC NOTICE**

**Public Scoping Meeting for the Raul Hector Castro Land Port of Entry Environmental Impact Statement**

The U.S. General Services Administration (GSA) is beginning preparation of an Environmental Impact Statement (EIS) to analyze the potential impacts resulting from the expansion and modernization of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) and the proposed construction of a new commercial LPOE in Douglas, Arizona. The RHC LPOE is owned and managed by GSA and operated by the U.S. Department of Homeland Security's Customs and Border Protection (CBP). The new commercial LPOE would address traffic safety and hazard concerns resulting from space constraints, inefficient traffic flows, and increasing traffic demands at the RHC LPOE.

The RHC LPOE is a port of entry for vehicles and pedestrians crossing the U.S.-Mexico border, between Douglas, Arizona and Agua Prieta, Sonora in Mexico. The port is a full-service, multi-modal facility where CBP officers inspect commercially-owned vehicles (COVs), privately-owned vehicles (POVs), and pedestrians. The port has been operating since 1914, with existing facilities constructed in the 1930s. Due to steady increases in traffic, poor pedestrian infrastructure, lack of separations between traffic types (COV, POV, and pedestrian), and outdated facilities and technologies, the facilities at the RHC LPOE no longer function adequately and pose safety and security risks for CBP officers and the general public. The existing RHC LPOE has spatial constraints, with limited interior space for offices and processing and limited opportunity for expansion within its current footprint. Additionally, the City of Douglas has expressed concerns about commercial traffic traveling through its downtown area.

The public is encouraged to attend and participate in the scoping meeting. The purpose of this meeting is to provide project information and to gauge public input on what resources and issues are important, which will help determine the scope and content of the EIS. The scoping meeting will occur on Thursday, August 11, 2022, from 4 to 6 pm, at:

Douglas Visitor Center,  
345 16th Street, Douglas,  
Arizona, 85607

Comments must be received by August 22, 2022 and may be submitted at the scoping meeting, by email to [osmahn.kadri@gsa.gov](mailto:osmahn.kadri@gsa.gov) (include "Douglas Scoping Comment" in subject line), or mailed to:

Attention: Osmahn Kadri,  
NEPA Project Manager  
General Services Administration  
c/o Potomac-Hudson Engineering, Inc.  
77 Upper Rock Circle, Suite 302  
Rockville, MD 20850

For more information or if special assistance is needed to attend and participate in the public scoping meeting, please contact Osmahn Kadri, GSA NEPA Project Manager, at 415-522-3617.  
**Publish: August 3 and 7, 2022**

**PUBLIC NOTICE**

**PUBLIC NOTICE**

**Public Scoping Meeting for the Raul Hector Castro Land Port of Entry Environmental Impact Statement**

The U.S. General Services Administration (GSA) is beginning preparation of an Environmental Impact Statement (EIS) to analyze the potential impacts resulting from the expansion and modernization of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) and the proposed construction of a new commercial LPOE in Douglas, Arizona. The RHC LPOE is owned and managed by GSA and operated by the U.S. Department of Homeland Security's Customs and Border Protection (CBP). The new commercial LPOE would address traffic safety and hazard concerns resulting from space constraints, inefficient traffic flows, and increasing traffic demands at the RHC LPOE. The RHC LPOE is a port of entry for vehicles and pedestrians crossing the U.S.-Mexico border, between Douglas, Arizona and Agua Prieta, Sonora in Mexico. The port is a full-service, multi-modal facility where CBP officers inspect commercially-owned vehicles (COVs), privately-owned vehicles (POVs), and pedestrians. The port has been operating since 1914, with existing facilities constructed in the 1930s. Due to steady increases in traffic, poor pedestrian infrastructure, lack of separations between traffic types (COV, POV, and pedestrian), and outdated facilities and technologies, the facilities at the RHC LPOE no longer function adequately and pose safety and security

risks for CBP officers and the general public. The existing RHC LPOE has spatial constraints, with limited interior space for offices and processing and limited opportunity for expansion within its current footprint. Additionally, the City of Douglas has expressed concerns about commercial traffic traveling through its downtown area.

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**Publish: August 3 and 7, 2022**

**Herald Review newspaper advertisements (Spanish) – July 20, August 3, and August 7, 2022**



**AFFIDAVIT OF PUBLICATION**

STATE OF ARIZONA        )  
                                      :SS.  
County of Cochise        )

Nancy Bernard, being first duly sworn, depôses and says that: (he) (she) is the Legal Advertising Representative of the Herald/Review Media newspaper printed and published three days a week in the City of Sierra Vista, County of Cochise, State of Arizona that this affidavit is Page 1 of 2 with the full text of the sworn-to notice set forth on the pages that follow, and the hereto attached was printed and published correctly in the regular and entire issue of said Herald/Review Media:

**PUBLICATION DATES:**

20 Jul 2022

**Notice ID:** rRk9XXR6te5wWjAz45H

**Notice Name:** Douglas Scoping (SP) (1 of 3 dates)

**Request of:**

phe  
77 Upper Rock Circle  
by: cynthia ong

*N Bernard*  
\_\_\_\_\_  
Legal Advertising Representative

**VERIFICATION**

STATE OF ARIZONA  
COUNTY OF COCHISE



Signed or attested before me on this

2<sup>nd</sup> day of August, 2022

*[Signature]*  
\_\_\_\_\_  
Notary Public

**My Commission Expires:** 8/12/2025



**AFFIDAVIT OF PUBLICATION**

STATE OF ARIZONA        )  
                                      :SS.  
County of Cochise        )

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**PUBLICATION DATES:**

3 Aug 2022, 7 Aug 2022

**Notice ID:** tHo51adqtx5fB3b0nYxP

**Notice Name:** Douglas Scoping (SP) (2 and 3 of 3 dates)

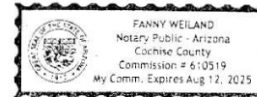
**Request of:**

phe  
77 Upper Rock Circle  
by: cynthia ong

*N Bernard*  
\_\_\_\_\_  
Legal Advertising Representative

**VERIFICATION**

STATE OF ARIZONA  
COUNTY OF COCHISE



Signed or attested before me on this

11<sup>th</sup> day of August, 2022

*[Signature]*  
\_\_\_\_\_  
Notary Public

**My Commission Expires:** 8/12/2025

**PUBLIC NOTICE**

**Reunión de Alcance Público para el RHC LPOE EIS, Douglas, AZ**

La Administración de Servicios Generales de los Estados Unidos (GSA, por sus siglas en inglés) está comenzando la preparación de una Declaración de Impacto Ambiental (EIS, por sus siglas en inglés) para analizar los impactos potenciales resultantes de la expansión y modernización del Puerto de Entrada Terrestre (LPOE, por sus siglas en inglés) Raúl Héctor Castro (RHC) y la construcción propuesta de un nuevo LPOE comercial en Douglas, Arizona. El RHC LPOE está administrado y es propiedad de la GSA, y es operado por la Oficina de Aduanas y Protección Fronteriza (CBP, por sus siglas en inglés) del Departamento de Seguridad Nacional de los Estados Unidos. El nuevo LPOE comercial abordaría la seguridad del tráfico y las preocupaciones sobre los peligros resultantes de las limitaciones de espacio, los flujos de tráfico ineficientes y la demanda creciente de tráfico en el RHC LPOE. El RHC LPOE es un puerto de entrada para vehículos y peatones que cruzan la frontera entre Estados Unidos y México, entre Douglas, Arizona y Agua Prieta, Sonora en México. El puerto es una instalación multimodal de servicio completo donde los oficiales de CBP inspeccionan vehículos de propiedad comercial (COV, por sus siglas en inglés), vehículos de propiedad privada (POV, por sus siglas en inglés) y peatones. El puerto ha estado operando desde 1914, y sus instalaciones existentes fueron construidas en la década de 1930. Debido a los aumentos constantes en el tráfico, la infraestructura peatonal deficiente, la falta de separaciones entre los tipos de tráfico (COV, POV y peatonal) y las instalaciones y tecnologías obsoletas, las instalaciones de RHC LPOE ya no funcionan adecuadamente y presentan riesgos de seguridad y protección para los funcionarios de CBP y el público en general. El RHC LPOE existente tiene restricciones de espacio, con espacio interior limitado para oficinas y procesamiento y oportunidades limitadas para la expansión dentro del espacio que ocupa actualmente. Además, la ciudad

de Douglas ha expresado su preocupación por el tráfico comercial que circula por el centro de la ciudad. Se alienta al público a asistir y participar en la reunión de alcance. El propósito de esta reunión es brindar información sobre el proyecto y evaluar la opinión del público sobre qué recursos y temas son importantes, lo que ayudará a determinar el alcance y el contenido de la EIS. La reunión de alcance tendrá lugar el jueves 11 de agosto de 2022, de 4 a 6 p. m., en:

Douglas Visitor Center, 345 16th Street, Douglas, Arizona, 85607

Los comentarios deben recibirse antes del 22 de agosto de 2022 y pueden enviarse en la reunión de alcance, por correo electrónico a [osmahn.kadri@gsa.gov](mailto:osmahn.kadri@gsa.gov) (incluya "Douglas Scoping Comment" en el asunto) o por correo postal a:

Osmahn Kadri, NEPA Project Manager  
General Services Administration  
c/o Potomac-Hudson Engineering, Inc.  
77 Upper Rock Circle, Suite 302  
Rockville, MD 20850

Para obtener más información o si necesita ayuda especial para asistir y participar en la reunión de alcance público, comuníquese con Osmahn Kadri, Gerente de Proyectos de NEPA, GSA, al 415-522-3617.

**Publish: July 20, 2022**

**PUBLIC NOTICE**

**PUBLIC NOTICE  
Reunión de Alcance Público para el RHC LPOE EIS, Douglas, AZ**

La Administración de Servicios Generales de los Estados Unidos (GSA, por sus siglas en inglés) está comenzando la preparación de una Declaración de Impacto Ambiental (EIS, por sus siglas en inglés) para analizar los impactos potenciales resultantes de la expansión y modernización del Puerto de Entrada Terrestre (LPOE, por sus siglas en inglés) Raúl Héctor Castro (RHC) y la construcción propuesta de un nuevo LPOE comercial en Douglas, Arizona. El RHC LPOE está administrado y es propiedad de la GSA, y es operado por la Oficina de Aduanas y Protección Fronteriza (CBP, por sus siglas en inglés) del Departamento de Seguridad Nacional de los Estados Unidos. El nuevo LPOE comercial abordaría la seguridad del tráfico y las preocupaciones sobre los peligros resultantes de las limitaciones de espacio, los flujos de tráfico ineficientes y la demanda creciente de tráfico en el RHC LPOE.

El RHC LPOE es un puerto de entrada para vehículos y peatones que cruzan la frontera entre Estados Unidos y México, entre Douglas, Arizona y Agua Prieta, Sonora en México. El puerto es una instalación multimodal de servicio completo donde los oficiales de CBP inspeccionan vehículos de propiedad comercial (COV, por sus siglas en inglés), vehículos de propiedad privada (POV, por sus siglas en inglés) y peatones. El puerto ha estado operando desde 1914, y sus instalaciones existentes fueron construidas en la década de 1930. Debido a los aumentos constantes en el tráfico, la infraestructura peatonal deficiente, la falta de separaciones entre los tipos de tráfico (COV, POV y peatonal) y las instalaciones y tecnologías obsoletas, las instalaciones de RHC LPOE ya no funcionan adecuadamente y presentan riesgos de seguridad y protección para los funcionarios de CBP y el público en general. El RHC LPOE existente tiene restricciones de espacio, con espacio interior limitado para oficinas y procesamiento y oportunidades limitadas para la expansión dentro del espacio que ocupa actualmente. Además, la ciudad de Douglas ha expresado su preocupación por el tráfico comercial que circula por el centro de la ciudad.

Se alienta al público a asistir y participar en la reunión de alcance. El propósito de esta reunión es brindar información sobre el proyecto y evaluar la opinión del público sobre qué recursos y temas son importantes, lo que ayudará a determinar el alcance y el contenido de la EIS. La reunión de alcance tendrá lugar el jueves 11 de agosto de 2022, de 4 a 6 p. m., en:

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**Publish: July 20, 2022**

**PUBLIC NOTICE**

**Reunión de Alcance Público para el RHC LPOE EIS, Douglas, AZ**

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**Publish: August 3 and 7, 2022**

**PUBLIC NOTICE**

**PUBLIC NOTICE**

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espacio interior limitado para oficinas y procesamiento y oportunidades limitadas para la expansión dentro del espacio que ocupa actualmente. Además, la ciudad de Douglas ha expresado su preocupación por el tráfico comercial que circula por el centro de la ciudad. Se alienta al público a asistir y participar en la reunión de alcance. El propósito de esta reunión es brindar información sobre el proyecto y evaluar la opinión del público sobre qué recursos y temas son importantes, lo que ayudará a determinar el alcance y el contenido de la EIS. La reunión de alcance tendrá lugar el jueves 11 de agosto de 2022, de 4 a 6 p. m., en:

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**Publish: August 3 and 7, 2022**



**APPENDIX C: LETTER TO INTERESTED PARTIES**

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GSA Pacific Rim Region

July 14, 2022

Dear Interested Reader,

Please be advised that the U.S. General Services Administration (GSA) will be preparing an Environmental Impact Statement (EIS) to analyze the potential impacts resulting from the expansion and modernization of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) and the proposed construction of a new commercial LPOE in Douglas, Arizona. The RHC LPOE is owned and managed by GSA and operated by the U.S. Department of Homeland Security's Customs and Border Protection (CBP). The new commercial LPOE would address traffic safety and hazard concerns resulting from space constraints, inefficient traffic flows, and increasing traffic demands at the RHC LPOE.

The RHC LPOE is a port of entry for vehicles and pedestrians crossing the U.S.-Mexico border, between Douglas, Arizona and Agua Prieta, Sonora in Mexico. The port is a full-service, multi-modal facility where CBP officers inspect commercially-owned vehicles (COVs), privately-owned vehicles (POVs), and pedestrians. The port has been operating since 1914, with existing facilities constructed in the 1930s. The existing Main Building and the Garage were built in 1933 and are listed on the National Register of Historic Places. Due to steady increases in traffic, poor pedestrian infrastructure, lack of separations between traffic types (COV, POV, and pedestrian), and outdated facilities and technologies, the facilities at the RHC LPOE no longer function adequately and pose safety and security risks for CBP officers and the public. The existing RHC LPOE has spatial constraints, with limited interior space for offices and processing and limited opportunity for expansion within its current footprint. Additionally, the City of Douglas has expressed concerns about commercial traffic traveling through its downtown area and posing safety risks to the community.

The project consists of two main components: 1) construction of a **new Commercial LPOE** at a site located approximately 5 miles west of the existing port; and 2) expansion and modernization of the existing RHC LPOE to a **Non-Commercial LPOE**, which would be dedicated to processing only POVs and pedestrians. The EIS will consider two "**action**" alternatives and one "**no action**" alternative. The two "**action**" alternatives are described as follows:

- **Alternative 1.** Includes construction of the new Commercial LPOE first, followed by a phased expansion and modernization of the existing RHC LPOE **after** the Commercial LPOE is operational.
- **Alternative 2.** Includes construction of the new Commercial LPOE and phased expansion and modernization of the existing RHC LPOE **at the same time**, to include land acquisition near the existing RHC LPOE, allowing expansion and modernization activities to occur while the existing RHC LPOE remains operational.

U.S. General Services Administration  
50 United Nations Plaza  
San Francisco, CA 94102  
[www.gsa.gov](http://www.gsa.gov)

Sub-alternatives may be considered for each alternative with respect to the management of **historic structures** located at the existing RHC LPOE.

The “no action” alternative is included and analyzed to provide a baseline for comparison with impacts from the Project and also to satisfy federal requirements for analyzing “no action” under the National Environmental Policy Act (NEPA) (40 Code of Federal Regulations [CFR] 1502.14(d)). The “no action” alternative assumes that the current issues with the RHC LPOE would not be addressed and that operations would continue under current conditions.

The public is encouraged to attend and participate in an upcoming scoping meeting. The purpose of this meeting is to provide project information and to gauge public concerns and interests, which will help determine the scope and content of the EIS. The scoping meeting for the EIS will be held on **Thursday, August 11, 2022, from 4:00 to 6:00 p.m.** at:

Douglas Visitor Center  
345 16th Street  
Douglas, AZ 85607

The meeting will be conducted in an open house format, where project information will be displayed and distributed. The open house format will encourage discussion and information sharing through opportunities for the public to speak one-on-one with representatives of the GSA. Interested parties are encouraged to attend and provide written comments regarding the scope of the EIS. Scoping comments must be received by **August 22, 2022** and may be submitted by one of the following methods:

- In writing. Submit comments at the scoping meeting.
- By e-mail. Send to [osmahn.kadri@gsa.gov](mailto:osmahn.kadri@gsa.gov) (reference “Douglas Scoping Comment” in subject line)
- By U.S. mail. Send to:

Attention: Osmahn Kadri, NEPA Project Manager  
General Services Administration  
c/o Potomac-Hudson Engineering, Inc.  
77 Upper Rock Circle, Suite 302  
Rockville, MD 20850

For more information or if special assistance is needed to attend and participate in the public scoping meeting, please contact Osmahn Kadri, GSA NEPA Project Manager, at 415-522-3617.

**APPENDIX D: ADVERTISING ON SOCIAL MEDIA**

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**Social Media Posts by GSA**

***Facebook***



***Twitter***

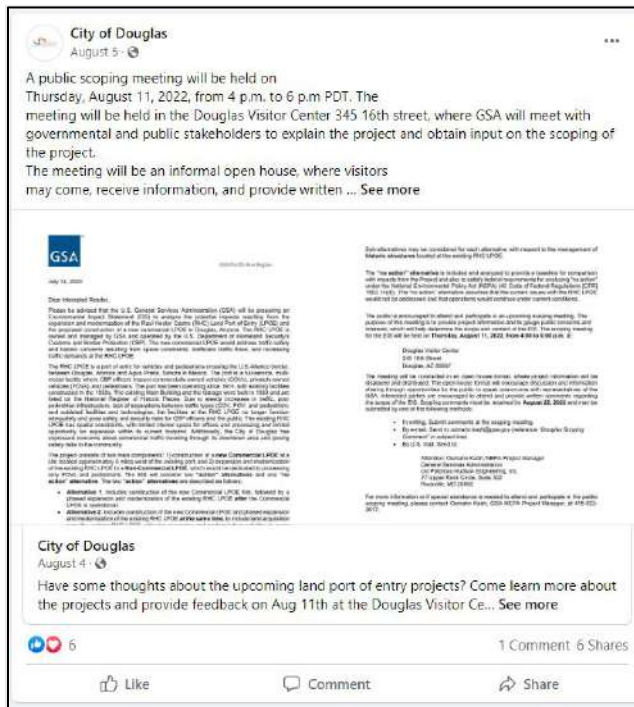


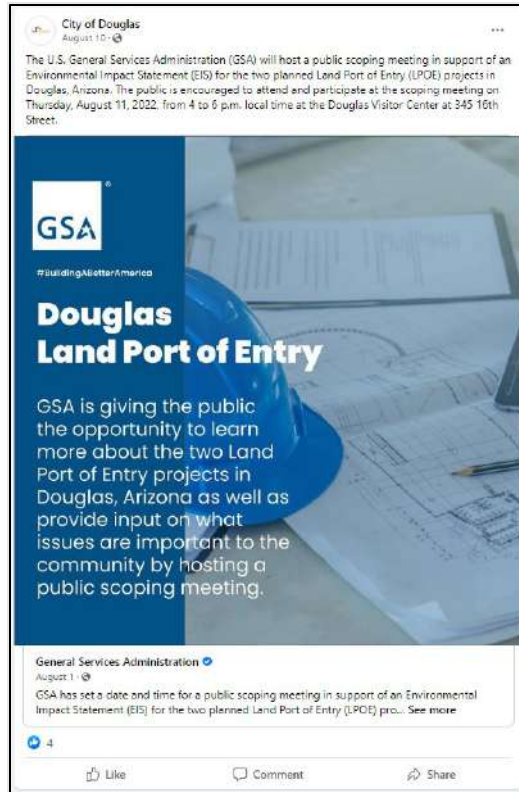
### Social Media Posts by the City of Douglas

#### Facebook









**Instagram**



The image shows a screenshot of an Instagram post from the account 'cityofdouglasaz'. The post features a photograph of a group of people at a public scoping meeting. A dark blue text overlay at the bottom of the photo reads: 'Douglas Dual Port Projects Public Scoping Meeting' and 'GSA is seeking input on the port projects' Environmental Impact Statement on August 11, 2022 from 4-6 p.m. at the Douglas Visitor Center located at 345 16th Street'. To the right of the photo, the post text reads: 'Attend a public scoping meeting for the renovation and extension of the Port of Entry by the General Services Administration of the United States (LPOE). The meeting will be held at 345 16th Street in Douglas, Arizona, on Thursday, August 11, 2022. The General Services Administration (GSA) is seeking input on the planned initiative from other government agencies, organizations, and the general public.' The post has 9 likes and was posted on August 27. The Instagram interface includes a search bar, 'Log In' and 'Sign Up' buttons, and a 'Follow' button for the account.



This is a second screenshot of the same Instagram post from 'cityofdouglasaz'. It features the same photograph and text overlay as the first screenshot. The post text is identical: 'Attend a public scoping meeting for the renovation and extension of the Port of Entry by the General Services Administration of the United States (LPOE). The meeting will be held at 345 16th Street in Douglas, Arizona, on Thursday, August 11, 2022. The General Services Administration (GSA) is seeking input on the planned initiative from other government agencies, organizations, and the general public.' However, this version of the post shows 5 likes and was posted on July 28. The Instagram interface elements are consistent with the first screenshot.

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**APPENDIX E: SCOPING MEETING POSTER DISPLAYS**

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**WELCOME** 

EXPANSION AND MODERNIZATION OF THE  
RAUL HECTOR CASTRO LAND PORT OF ENTRY AND  
PROPOSED COMMERCIAL LAND PORT OF ENTRY  
DOUGLAS, ARIZONA  
ENVIRONMENTAL IMPACT STATEMENT

**PUBLIC SCOPING MEETING**




**August 11, 2022**  
**Douglas Visitor Center**  
**4:00 PM to 6:00 PM**

**OPEN HOUSE** 

**WE WANT YOUR COMMENTS!**

 **In Writing.** Fill out a comment form and submit at this scoping meeting.

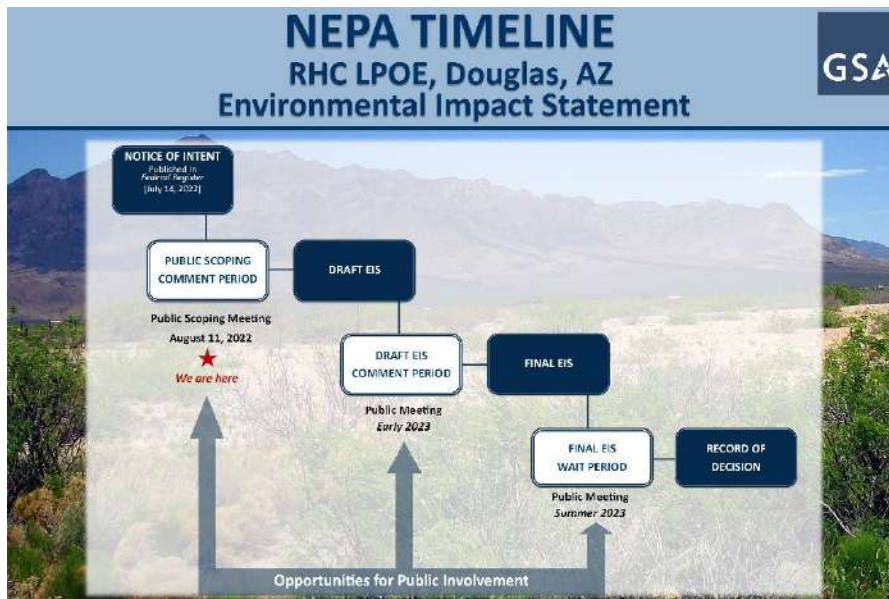
 **By E-mail.** Send comments to:  
*osmahn.kadri@gsa.gov*  
(Please include "Douglas Scoping Comment" in subject line.)

 **By Mail.** Send comments to:  
Attention: Osmahn Kadri, NEPA Project Manager  
General Services Administration  
c/o Potomac-Hudson Engineering, Inc.  
77 Upper Rock Circle, Suite 302  
Rockville, MD 20850



*GSA welcomes public input on the resources and issues that are important to you.*

**Public scoping comments must be received by August 22, 2022.**



## National Environmental Policy Act GSA

### KEY STEPS




*Federal agencies are required under the National Environmental Policy Act (NEPA) to integrate environmental values into planning and decision-making processes by considering the environmental impacts of proposed actions and reasonable alternatives to those actions through a systematic, interdisciplinary approach.*



## PROJECT BACKGROUND


### RHC LPOE, Douglas, AZ Environmental Impact Statement



The Raul Hector Castro (RHC) Land Port of Entry (LPOE) is owned and managed by the U.S. General Services Administration (GSA) and operated by the U.S. Department of Homeland Security's Customs and Border Protection (CBP). The RHC LPOE is a port of entry for vehicles and pedestrians crossing the U.S.-Mexico border, between Douglas, Arizona and Agua Prieta, Sonora in Mexico. The port is a full-service, multi-modal facility where CBP officers inspect commercially-owned vehicles (COVs), privately-owned vehicles (POVs), and pedestrians.

The RHC LPOE has operated since 1914, with existing facilities constructed in the 1930s. Facilities within the RHC LPOE include the historic Main Building and Garage. Due to steady increases in traffic, poor pedestrian infrastructure, lack of separation between traffic types (COV, POV, and pedestrian), and outdated facilities and technologies, the facilities at the RHC LPOE no longer function adequately and pose safety and security risks for CBP officers and the general public. The existing RHC LPOE has limited opportunity for expansion within its current footprint. The existing facilities also have limited interior space for offices and processing. Additionally, truck traffic is routed through downtown Douglas and is a safety concern for the community.


To address these issues, GSA is proposing to expand and modernize the existing RHC LPOE and construct a new Commercial LPOE to the west of the existing port. The Environmental Impact Statement (EIS) will analyze the potential environmental impacts of the project.



**Project Location (RHC LPOE and Proposed Commercial LPOE)**

## PURPOSE AND NEED

### RHC LPOE, Douglas, AZ Environmental Impact Statement

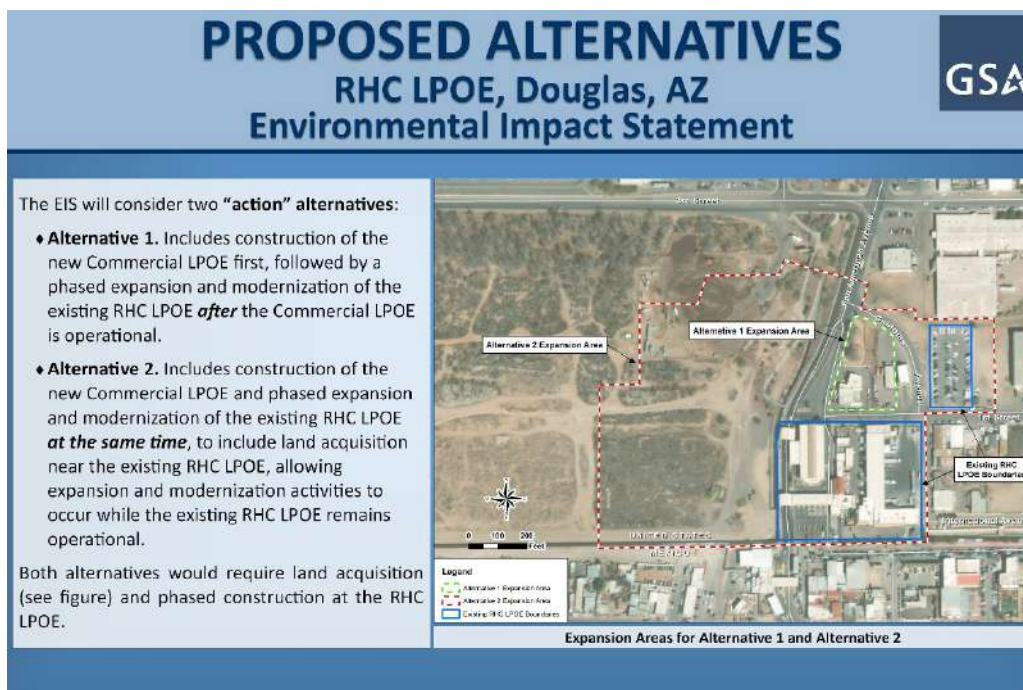
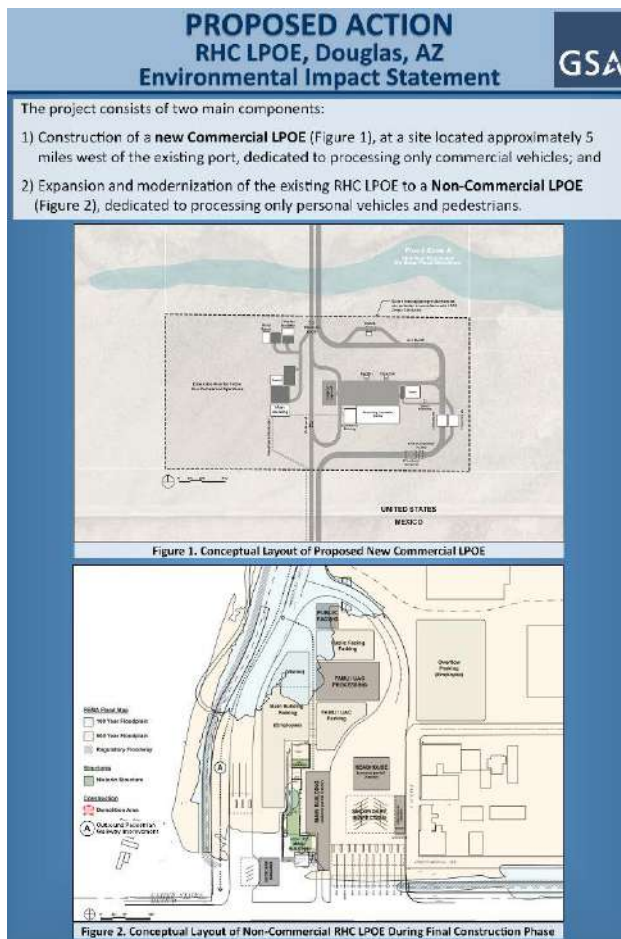


**Purpose.** The purpose of the Proposed Action is for GSA to support Customs and Border Protection's (CBP) mission by bringing the RHC LPOE operations in line with current land port design standards and operational requirements of CBP while addressing existing deficiencies identified with the ongoing port operations.

**Need.** The Proposed Action is needed to:

- ◆ Improve the capacity and functionality of the port 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.





**APPENDIX F: SCOPING COMMENT FORM**

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**APPENDIX G: SCOPING MEETING HANDOUTS**

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## Summary

The U.S. General Services Administration (GSA) intends to prepare an Environmental Impact Statement (EIS) to analyze the potential impacts resulting from the expansion and modernization of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) and the proposed construction of a new Commercial LPOE in Douglas, Arizona. The RHC LPOE is owned and managed by GSA and operated by the U.S. Department of Homeland Security's Customs and Border Protection (CBP). The new commercial LPOE would address traffic safety and hazard concerns resulting from space constraints, inefficient traffic flows, and increasing traffic demands at the RHC LPOE.

## Project Background

The RHC LPOE is a port of entry for vehicles and pedestrians crossing the U.S.-Mexico border, between Douglas, Arizona and Agua Prieta, Sonora in Mexico. The port is a full-service, multi-modal facility where CBP officers inspect commercially-owned vehicles (COVs), privately-owned vehicles (POVs), and pedestrians. The port has been operating since 1914, with existing facilities constructed in the 1930s. The existing Main Building and the Garage were built in 1933 and are listed on the National Register of Historic Places. Due to steady increases in traffic, poor pedestrian infrastructure, lack of separations between traffic types (COV, POV, and pedestrian), and outdated facilities and technologies, the facilities at the RHC LPOE no longer function adequately and pose safety and security risks for CBP officers and the general public. The existing RHC LPOE has spatial constraints, with limited interior space for offices and processing and limited opportunity for expansion within its current footprint. Additionally, the City of Douglas has expressed concerns over the truck traffic currently traveling through its downtown area and posing safety risks to the community.

## Proposed Alternatives

The project consists of two main components: 1) construction of a **new Commercial LPOE** at a site located approximately 5 miles west of the existing port; and 2) expansion and modernization of the existing RHC LPOE to a **Non-Commercial LPOE**, which would be dedicated to processing only POVs and pedestrians. The EIS will consider two **“action” alternatives** and one **“no action” alternative**. The two **“action” alternatives** are described as follows:

- **Alternative 1.** Includes construction of the new Commercial LPOE first, followed by a phased expansion and modernization of the existing RHC LPOE **after** the Commercial LPOE is operational.
- **Alternative 2.** Includes construction of the new Commercial LPOE and phased expansion and modernization of the existing RHC LPOE **at the same time**, to include land acquisition near the existing RHC LPOE, allowing expansion and modernization activities to occur while the existing RHC LPOE remains operational.

Sub-alternatives may be considered for each alternative with respect to the management of historic structures located at the existing RHC LPOE.

The “no action” alternative assumes that GSA would not expand and modernize the RHC LPOE or construct a new commercial LPOE and that operations would continue under current conditions. The current issues at the RHC LPOE would not be addressed.



General Services Administration

**Raul Hector Castro Land Port of Entry, Douglas, Arizona**  
**Environmental Impact Statement**  
**SCOPING MEETING HANDOUT**



Figure 1. Location of RHC LPOE and Proposed New Commercial Port

### National Environmental Policy Act (NEPA) Process

We are currently in the Public Scoping process phase of the NEPA process. The views and comments of the public are necessary to help determine the scope and content of the environmental analysis. An important objective of scoping is to identify specific elements of the environment that might be affected if the proposal is carried out. Potentially significant impacts raised during scoping will be analyzed in detail in the EIS.



### Scoping Comments

Scoping comments must be received by **August 22, 2022** and may be submitted by one of the following methods:

- In writing. Submit comments at the scoping meeting.
- By e-mail. Send to [osmahn.kadri@gsa.gov](mailto:osmahn.kadri@gsa.gov). Please reference "Douglas Scoping Comment" in the subject line.
- By U.S. mail. Send to:  
Attention: Osmahn Kadri, NEPA Project Manager  
General Services Administration  
c/o Potomac-Hudson Engineering, Inc.  
77 Upper Rock Circle, Suite 302  
Rockville, MD 20850

For further information, please contact Osmahn Kadri, GSA NEPA Project Manager, at (415) 522-3617.



## Resumen

La Administración de Servicios Generales de Estados Unidos (GSA, por sus siglas en inglés) tiene la intención de preparar una Declaración de Impacto Ambiental (EIS, por sus siglas en inglés) para analizar los impactos potenciales resultantes de la expansión y modernización del Puerto de Entrada Terrestre (LPOE, por sus siglas en inglés) Raúl Héctor Castro (RHC) y la construcción propuesta de un nuevo LPOE Comercial en Douglas, Arizona. El RHC LPOE está administrado y es propiedad de GSA y es operado por la Oficina de Aduanas y Protección Fronteriza (CBP, por sus siglas en inglés) del Departamento de Seguridad Nacional de los Estados Unidos. El nuevo LPOE comercial abordaría la seguridad del tráfico y las preocupaciones sobre peligros resultantes de las limitaciones de espacio, los flujos de tráfico ineficientes y las crecientes demandas de tráfico en el RHC LPOE.

## Antecedentes del Proyecto

El RHC LPOE es un puerto de entrada para vehículos y peatones que cruzan la frontera entre Estados Unidos y México, entre Douglas, Arizona y Agua Prieta, Sonora en México. El puerto es una instalación multimodal de servicio completo donde los oficiales de CBP inspeccionan vehículos de propiedad comercial (COV, por sus siglas en inglés), vehículos de propiedad privada (POV, por sus siglas en inglés) y peatones. El puerto ha estado operando desde 1914, con instalaciones existentes construidas en la década de 1930. El edificio principal y el garaje existente se construyeron en 1933 y están incluidos en el Registro Nacional de Lugares Históricos. Debido a los aumentos constantes en el tráfico, la infraestructura peatonal deficiente, la falta de separaciones entre los tipos de tráfico (COV, POV y peatones) y las instalaciones y tecnologías obsoletas, las instalaciones en RHC LPOE ya no funcionan adecuadamente y presentan riesgos de seguridad y protección para los funcionarios de CBP y el público en general. El RHC LPOE existente tiene restricciones de espacio, con espacio interior limitado para oficinas y procesamiento y oportunidades limitadas para la expansión dentro del espacio que ocupa actualmente. Además, la ciudad de Douglas ha expresado su preocupación por el tráfico de camiones que circula actualmente por el centro de la ciudad y presenta riesgos de seguridad para la comunidad.

## Alternativas Propuestas

El proyecto consta de dos componentes principales: 1) construcción de un nuevo LPOE comercial en un sitio ubicado aproximadamente a 5 millas al oeste del puerto existente; y 2) expansión y modernización del RHC LPOE existente a un LPOE no comercial, que se dedicaría a procesar solo POV y peatones. El EIS considerará dos alternativas de "acción" y una alternativa de "no acción". Las dos alternativas de "acción" se describen a continuación:

- **Alternativa 1.** Primero incluye la construcción del nuevo LPOE comercial, seguida de una expansión y modernización por etapas del LPOE RHC existente **después** de que el LPOE comercial esté operativo.
- **Alternativa 2.** Incluye la construcción del nuevo LPOE comercial y la expansión y modernización por etapas del RHC LPOE existente **al mismo tiempo**, para incluir la adquisición de terrenos cerca del RHC LPOE existente, lo que permitiría que se lleven a cabo actividades de expansión y modernización mientras el RHC LPOE existente permanece operativo.

Se pueden considerar subalternativas para cada alternativa con respecto a la gestión de estructuras históricas ubicadas en el RHC LPOE existente.

La alternativa de "no tomar acción" supone que GSA no expandiría ni modernizaría el LPOE de RHC ni construiría un nuevo LPOE comercial y que las operaciones continuarían en las condiciones actuales. No se abordarían los problemas actuales en el RHC LPOE.





La Imagen 1. La Ubicación del RHC LPOE y el Nuevo Puerto Comercial Propuesto

### Proceso de la Ley Nacional de Política Ambiental (NEPA, por sus siglas en inglés)

Actualmente estamos en la fase del proceso de alcance público del proceso NEPA. Las opiniones y comentarios del público son necesarios para ayudar a determinar el alcance y contenido del análisis ambiental. Un objetivo importante del alcance es identificar elementos específicos del entorno que podrían verse afectados si se lleva a cabo la propuesta. Los impactos potencialmente significativos planteados durante la evaluación del alcance se analizarán en detalle en el EIS.



### Comentarios de Alcance

Los comentarios de alcance deben recibirse antes del 22 de agosto de 2022 y pueden enviarse mediante uno de los siguientes métodos:

- Por escrito. Envíe comentarios en la reunión de alcance.
- Por correo electrónico. Envíelo a [osmahn.kadri@gsa.gov](mailto:osmahn.kadri@gsa.gov). Por favor, incluya "Douglas Scoping Comment" en la línea de asunto.
- Por correo postal de los Estados Unidos. Enviar a:  
 Attention: Osmahn Kadri, NEPA Project Manager  
 General Services Administration  
 c/o Potomac-Hudson Engineering, Inc.  
 77 Upper Rock Circle, Suite 302  
 Rockville, MD 20850

Para obtener más información, comuníquese con Osmahn Kadri, Gerente de Proyectos de NEPA, GSA al (415) 522-3617.

**APPENDIX H: SCOPING MEETING SIGN-IN SHEETS**

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General Services Administration  
Raul Hector Castro Land Port of Entry, Douglas, Arizona  
Environmental Impact Statement  
PUBLIC SCOPING MEETING




SIGN-IN SHEET

\*\*\*Please print clearly\*\*\*

Name	Organization	Mailing Address	E-mail Address	Would you like to be informed of project developments?
Xenia Gonzalez	City of Douglas	[REDACTED]	[REDACTED]	yes
Irma U Teran	Douglas	[REDACTED]	[REDACTED]	yes
Paloma Teran	Legislator-Sonora	[REDACTED]	[REDACTED]	yes
Sickel Merritt	Arizona	[REDACTED]	[REDACTED]	yes
Danya Aurora	City of Douglas	[REDACTED]	[REDACTED]	yes
SARAH SELLIS	Cochise County	[REDACTED]	[REDACTED]	YES

Date:





General Services Administration  
Raul Hector Castro Land Port of Entry, Douglas, Arizona  
Environmental Impact Statement  
PUBLIC SCOPING MEETING

**SIGN-IN SHEET**  
\*\*\* Please print clearly \*\*\*

Would you like to be informed of project developments?

Name	Organization	Mailing Address	E-mail Address	Would you like to be informed of project developments?
TRISANNE TETRINONI	LAST SUPPER MUSEUM	[REDACTED]	[REDACTED]	YES
ERIC BRAVERMAN	LAST SUPPER MUSEUM	[REDACTED]	[REDACTED]	YES
Dante Villalobos	City of Douglas	[REDACTED]	[REDACTED]	YES
Sharon Gilman	Cochise County	[REDACTED]	[REDACTED]	YES
Denise Machado	Abbott Reality	[REDACTED]	[REDACTED]	YES
Allyson Murray	Alcott Realty	[REDACTED]	[REDACTED]	YES
Paul E. Franco	Infinite Power	[REDACTED]	[REDACTED]	YES
Jesus Carlos Batista	Batista Wholesale	[REDACTED]	[REDACTED]	YES
Daniel Penn	✓	[REDACTED]	[REDACTED]	✓
Abe Villarreal	Cochise County	[REDACTED]	[REDACTED]	✓
Jose Goyola	City of Douglas	[REDACTED]	[REDACTED]	✓

Date: \_\_\_\_\_



General Services Administration  
**Raul Hector Castro Land Port of Entry, Douglas, Arizona**  
 Environmental Impact Statement  
**PUBLIC SCOPING MEETING**



**SIGN-IN SHEET**

\*\*\*Please print clearly\*\*\*

Name	Organization	Mailing Address	E-mail Address	Would you like to be informed of project developments?
Meissa Salcido				
Hareo Salcido				
Ann English	Cochise County			✓
Dr. Michael Gomez	Past Mayor			✓
Blindy GOMEZ				
GEORGE JEN	CBP			✓
MIKE URAQUI	CBP			
KENDEL GRIFFIN	CBP			
Martin Rodriguez	Ramirez Advice			✓
Luis Ramirez	Ramirez Advice			✓
Mark Sanders	ADOT			✓

Date:



General Services Administration  
Raul Hector Castro Land Port of Entry, Douglas, Arizona  
Environmental Impact Statement  
PUBLIC SCOPING MEETING

**SIGN-IN SHEET**

\*\*\*Please print clearly\*\*\*

Name	Organization	Mailing Address	E-mail Address	Would you like to be informed of project developments?
Adele del Pedregal	AMA, IDA	[REDACTED]	[REDACTED]	yes.
Juan Figueroa	—	[REDACTED]	[REDACTED]	yes
Mario Suarez	M+M	[REDACTED]	[REDACTED]	yes
Hector Mondragon	M+M Building Services	[REDACTED]	[REDACTED]	yes
Concepcion Sanchez	Public	[REDACTED]	[REDACTED]	yes
Francisco Hernandez	GAIE	[REDACTED]	[REDACTED]	yes
Diana Hernandez	Public	[REDACTED]	[REDACTED]	YES
STEVEN HEITFRICH	STUDIO	[REDACTED]	[REDACTED]	[REDACTED]
Frank Ambroz	Private	[REDACTED]	[REDACTED]	yes
Luis Pedrosa	City of Douglas	[REDACTED]	[REDACTED]	yes
Rocio Garcia-Pedrosa	" "	[REDACTED]	[REDACTED]	yes

Date:

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**APPENDIX I: INDEX OF COMMENTS BY SOURCE AND DATE**

<b>Commenter ID</b>	<b>Total Comments</b>	<b>Date</b>	<b>Name</b>	<b>Affiliation (if any)</b>	<b>Comment Method</b>
<b>Agency</b>					
A1	0	7/14/2022	Jon Janowicz	U.S. Geological Survey (USGS)	Email
A2	3	8/8/2022	Amy Lueder	U.S. Fish and Wildlife Service (FWS)	Email / Letter
A3	16	8/15/2022	Zac Appleton, Environmental Review Branch	U.S. Environmental Protection Agency (EPA)	Email / Letter
<b>Public</b>					
P1	1	8/09/2022	Melissa Salcido	M & A Painting and Drywall	Email / Letter
P2	1	8/10/2022	Ray Novoa	Novoa Realty	Email
P3	1	8/11/2022	Unnamed		Scoping Meeting
P4	1	8/11/2022	Unnamed		Scoping Meeting
P5	1	8/11/2022	Unnamed		Scoping Meeting / Letter
P6	1	8/11/2022	Eric Braverman	Killing Time Productions International; Last Supper Museum	Scoping Meeting / Comment Form
P7	4	8/12/2022; 8/19/2022	Steven Helffrich	studioARCHITECTURE	Email / Comment Form / Letter
P8	2	8/15/2022	Kurt Stickler		Email / Comment Form
P9	2	8/16/2022	Carmen Bernal	Advanced Ceramics Manufacturing	Email / Comment Form / Letter
P10	2	8/16/2022	David Ivan Clark		Email / Comment Form
P11	2	8/16/2022	Mieko Brown		Email / Comment Form
P12	2	8/16/2022	MJ Druckman		Email / Comment Form
P13	1	8/17/2022	Ben La Forge		Email
P14	2	8/18/2022	Frank Tadeo		Email / Comment Form
P15	1	8/19/2022	Janea Sanchez	Border Arts Corridor	Email
P16	1	8/21/2022	Joe Flynn		Email
P17	2	8/22/2022	Raymond Ortiz		Email
P18	1	8/22/2022	Neil Petersen		Email
P19	1	8/22/2022	John Trautmann		Email
P20	4	8/24/2022	Michael Saremi		Email

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## APPENDIX B – CONSULTATION AND COORDINATION

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## U.S. FISH AND WILDLIFE



GSA Pacific Rim Region

November 22, 2022

Ms. Jonna Polk  
Assistant Regional Director  
USFWS Ecological Services  
Flagstaff, AZ 86005

**RE: Proposed Expansion and Modernization of the Raul Hector Castro Land Port of Entry (LPOE) and Construction of a New Commercial LPOE in Douglas, Arizona**

Dear Ms. Polk,

The U.S. General Services Administration (GSA) is preparing an Environmental Impact Statement (EIS) to analyze the potential impacts resulting from the expansion and modernization of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) and the proposed construction of a new commercial LPOE in Douglas, Arizona (see Figure 1, Enclosure 1). The RHC LPOE is owned and managed by GSA and operated by the U.S. Department of Homeland Security's Customs and Border Protection (CBP). The new commercial LPOE would address traffic safety and hazard concerns resulting from space constraints, inefficient traffic flows, and increasing traffic demands at the RHC LPOE.

GSA appreciates the comments the U.S. Fish and Wildlife Services Arizona Ecological Services Field Office provided on this project on August 8, 2022 (#FWS/R2/ES-ER/077421). The purpose of this letter is to request technical assistance from the U.S. Fish and Wildlife Services Arizona Ecological Services Field Office regarding the potential for federally listed species or critical habitat within the vicinity of the proposed project. GSA is requesting any further information on protected species at the project site for consideration in the development of the EIS and any conservation measures USFWS recommends for protection of species at the project.

USFWS records indicates the potential for six federally protected species: jaguar, yellow-billed cuckoo, northern Mexican gartersnake, Chiricahua leopard frog, Yaqui catfish, and Yaqui chub. Two Information for Planning and Consultation (IPaC) reports were generated for your reference under the "Douglas POE" and "Douglas POE (2)" project names; Project Codes #2023-0017098 and #2023-0017284.

The RHC LPOE is a port of entry for vehicles and pedestrians crossing the U.S.-Mexico border, between Douglas, Arizona and Agua Prieta, Sonora in Mexico. The port is a full-service, multi-modal facility where CBP officers inspect commercially owned vehicles (COVs), privately-owned vehicles (POVs), and pedestrians. The port has been operating since 1914, with existing facilities constructed in the 1930s. The existing Main Building and the Garage were built in 1933 and are listed on the National Register of Historic Places. Due to steady increases in traffic, poor pedestrian infrastructure, lack of separations between traffic types (COV, POV, and pedestrian), and outdated facilities and technologies, the facilities at the RHC LPOE no longer function adequately and pose safety and security risks for CBP officers and the public. The existing RHC LPOE has spatial constraints, with limited interior space for offices and processing and limited opportunity for expansion within its current footprint. Additionally, the City of Douglas has expressed concerns about commercial traffic traveling through its downtown area and posing safety risks to the community.

U.S. General Services Administration  
50 United Nations Plaza  
San Francisco, CA 94102  
[www.gsa.gov](http://www.gsa.gov)

The project consists of two main components: 1) construction of a **new Commercial LPOE** at a site located approximately 5 miles west of the existing port (see Figure 2 in Enclosure 1); and 2) expansion and modernization of the existing RHC LPOE to a **Non-Commercial LPOE**, which would be dedicated to processing only POVs and pedestrians (see Figure 3 in Enclosure 1). The EIS will consider two **“action” alternatives** and one **“no action” alternative**. The two **“action” alternatives** are described as follows:

- **Alternative 1.** Includes construction of the new Commercial LPOE first, followed by a phased expansion and modernization of the existing RHC LPOE **after** the Commercial LPOE is operational.
- **Alternative 2.** Includes construction of the new Commercial LPOE and phased expansion and modernization of the existing RHC LPOE **at the same time**, to include land acquisition near the existing RHC LPOE, allowing expansion and modernization activities to occur while the existing RHC LPOE remains operational.

The **“no action” alternative** is included and analyzed to provide a baseline for comparison with impacts from the Project and also to satisfy federal requirements for analyzing “no action” under the National Environmental Policy Act (NEPA) (40 Code of Federal Regulations [CFR] 1502.14(d)). The “no action” alternative assumes that the current issues with the RHC LPOE would not be addressed and that operations would continue under current conditions.

A biological reconnaissance of the project area was conducted by a qualified biologist on August 18 and 19, 2022 in support of this project. The biological reconnaissance did not identify any potential habitat for any of the six federally protected species identified with potential to occur in the project area. Potential dispersal habitat for Chiricahua leopard frog was identified approximately 100 feet north of the project boundary from the commercial LPOE. Anthropogenic noise caused by construction, human activity, and increased vehicle traffic may affect male vocalization habits during the mating season. Potential runoff or sedimentation into this habitat could also adversely affect water quality. However, GSA understands dispersal habitat for this species to be “areas with ephemeral (present for only a short time), intermittent, or perennial water that are generally not suitable for breeding and associated upland or riparian corridors” (Reference Consultation # 02ENNM00-2020-F-0593). As the potential dispersal habitat lies approximately 100 feet beyond of the proposed commercial LPOE boundary, no physical impacts would occur to this species. However, noise generated by construction or operation of the proposed commercial LPOE could affect species located outside of the facility footprint in adjacent dispersal habitat. GSA plans to employ measures to limit stormwater runoff from the project site during construction and operations. Construction would be subject to the terms of Arizona Stormwater Construction General Permit and City of Douglas Permit. Selection of stormwater management facilities to be incorporated into the project is subject to final design but based on other similar LPOE projects may include street drainage connected to storm drains which lead to a bioretention basin system where stormwater will percolate into the ground. Specific design requirements would meet approval under the Arizona Stormwater Construction General Permit Stormwater Management Program.

We respectfully ask that you provide any information or comments, including any information that would inform GSA’s effect determination with respect to the Chiricahua leopard frog, within 30 days to enable us to complete this phase of the project within the scheduled timeframe to Osmahn Kadri at (415) 522-3617 or [osmahn.kadri@gsa.gov](mailto:osmahn.kadri@gsa.gov). Additionally, questions can be mailed to Osmahn Kadri, NEPA Project Manager, General Services Administration, c/o Potomac-Hudson Engineering, Inc., 77 Upper Rock Circle, Suite 302, Rockville, MD 20850.

U.S. General Services Administration  
50 United Nations Plaza  
San Francisco, CA 94102  
[www.gsa.gov](http://www.gsa.gov)

If you have any questions or require additional information, please do not hesitate to call or email. Thank you for your assistance in this matter.

Sincerely,

11/22/2022

X Osmahn Kadri

Osmahn Kadri  
NEPA Program Manager  
Signed by: OSMAHN KADRI

Enclosures

U.S. General Services Administration  
50 United Nations Plaza  
San Francisco, CA 94102  
[www.gsa.gov](http://www.gsa.gov)



## United States Department of the Interior

Fish and Wildlife Service  
Arizona Ecological Services Office  
9828 North 31<sup>st</sup> Avenue, Suite C3  
Phoenix, Arizona 85051

Telephone: (602) 242-0210 Fax: (602) 242-2513



**In reply refer to:**  
2023-0017098

December 16, 2022

Osmahn Kadri, NEPA Program Manager  
Region 9, General Services Administration  
50 United Nations Plaza  
San Francisco, California, 94102

Dear Osmahn Kadri:

Thank you for your correspondence on November 22, 2022, asking for technical assistance related to the Preferred Alternative of the Expansion and Modernization of the Raul Hector Castro Land Port of Entry and Proposed Commercial Land Port of Entry Project in Douglas, Arizona. This letter documents our review of the Project in Cochise County, Arizona, in compliance with section 7 of the Endangered Species Act of 1973 (ESA) as amended (16 U.S.C. 1531 *et seq.*). Your letter indicated that a biological survey of the proposed site revealed potential Chiricahua leopard frog (*Rana chiricahuensis*) dispersal habitat within 100 feet (ft.) of the project area. Your concerns are the potential noise disturbance effects to dispersing Chiricahua leopard frogs.

The Chiricahua leopard frog Recovery Plan (USFWS 2007), describes breeding habitat as falling within a narrow portion of the continuum from small, shallow, ephemeral, and unpredictable waters to large, deep, predictable, and perennial waters. It is excluded from ephemeral habitats by its requirements for surface moisture for adult survival and a relatively long larval period (minimum of 3 months). Chiricahua leopard frogs are often excluded from perennial habitats by the presence of non-native predatory and competing species of fishes, frogs, and crayfish. Prior to the arrival of the American bullfrog, the Chiricahua leopard frog was one of the most aquatic of frogs in the Southwest. In the Southwest, leopard frogs are currently so strongly impacted by harmful non-native species, which are most prevalent in perennial waters, that their occupied niche is increasingly restricted to environments that tend to be ephemeral and unpredictable. Chiricahua leopard frogs are reasonably likely to disperse about one mile overland, three miles along intermittent drainages, and five miles along permanent drainages. More information about Chiricahua leopard frog biology, habitat, and recovery, please see the Final Recovery Plan, found at <https://ecos.fws.gov/ecp/species/1516>.

Osmahn Kadri

2

In relation to the site location of the Preferred Alternative (Alternative #1), the closest known Chiricahua leopard frog locations are 7, 11, and 30 miles away, and do not pose the potential for these frogs to be present during project activities at Chiricahua leopard frogs do not generally disperse over these distances. Further, the potential connecting habitats between these sites and the project location are occupied by bullfrogs and not useable as dispersal mechanisms for the Chiricahua leopard frog.

We also recommend you seek additional information and coordinate your project with the Arizona Game and Fish Department, as other species of concern are managed at the state level.

If you require further assistance or you have any questions, please contact Cassandra Walker (cassandra\_walker@fws.gov) or Julie McIntyre (julie\_mcintyre@fws.gov). Please refer to consultation number 2023-0017098 in any future correspondence. Thank you for your continued efforts to conserve endangered species.

Sincerely,

Julie  
McIntyre for

Digitally signed by  
Julie McIntyre for  
Date: 2022.12.16  
11:58:16 -07'00'

Heather Whitlaw  
Field Supervisor

Cc (electronic):

[pep@azgfd.gov](mailto:pep@azgfd.gov), Arizona Game and Fish Department, Phoenix, AZ

REFERENCES:

U.S. Fish and Wildlife Service. 2007. Chiricahua Leopard Frog (*Rana chiricahuensis*) Final Recovery Plan. Pages 1–429. Recovery Plan. Region 2 (Southwest), U.S. Fish and Wildlife Service, Albuquerque, New Mexico, United States.



GSA Pacific Rim Region

September 8, 2023

Ms. Julie McIntyre  
U.S. Fish and Wildlife Service  
Arizona Ecological Services Office  
Flagstaff, AZ 86005

**RE: Continuation of Consultation #2023-0017098/2023-0017284, Proposed Expansion and Modernization of the Raul Hector Castro Land Port of Entry (LPOE) and Construction of a New Commercial LPOE in Douglas, Arizona**

Dear Ms. McIntyre,

The U.S. General Services Administration (GSA) appreciates your comments on the Draft Environmental Impact Statement (DEIS) for the Expansion and Modernization of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) and Proposed Commercial LPOE in Douglas, Arizona, provided on February 8, 2023. The Proposed Action would comprise of two main components: 1) construction of a new Commercial LPOE dedicated to commercially-owned vehicles (COVs), located approximately 5 miles west of the existing port; and 2) expansion and modernization of existing RHC LPOE facilities to serve as a noncommercial LPOE dedicated to processing privately-owned vehicles (POVs) and pedestrians. The purpose of the project is for GSA to support the U.S. Custom and Border Protection's (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 operational deficiencies. The project is needed to: improve 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 workers and users of the LPOE; and improve traffic congestion and safety for the City of Douglas.

GSA originally considered two action alternatives in the original DEIS, published on January 27, 2023:

- **Alternative 1.** Includes construction of the new Commercial LPOE first, followed by a phased expansion and modernization of the existing RHC LPOE *after* the Commercial LPOE is operational. This alternative would require land acquisition near the existing RHC LPOE and at the Commercial LPOE site.
- **Alternative 2.** Includes construction of the new Commercial LPOE and phased expansion and modernization of the existing RHC LPOE *at the same time*, to include additional land acquisition west of the existing RHC LPOE, allowing expansion and modernization activities to occur while the existing RHC LPOE remains operational.

Since publication of the DEIS, GSA has identified an additional viable alternative for consideration in expanding east of the RHC LPOE (**Alternative 3**), which is being considered in addition to Alternatives 1 and 2:

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- **Alternative 3** would also include construction of a new Commercial LPOE and phased expansion and modernization of the existing RHC LPOE at the same time, similar to Alternative 2, but with the RHC LPOE expanding primarily to the east of the existing LPOE (see Figure 1).

Because of the addition of this alternative, GSA is re-issuing this revised DEIS for public review.

The DEIS will be available for review from September 8, 2023 to October 23, 2023. After this date, GSA will prepare the Final EIS. The DEIS is available online at <https://www.gsa.gov/about-us/regions/region-9-pacific-rim/land-ports-of-entry/raul-hector-castro-land-port-of-entry/environmental-review> or <https://www.gsa.gov/about-us/regions/welcome-to-the-pacific-rim-region-9/land-ports-of-entry/douglas-commercial-land-port-of-entry>. GSA has responded to your comments in Appendix E of the revised DEIS.

GSA will be hosting a Public Meeting for the revised DEIS on Wednesday, September 27, 2023, **from 4:00 to 6:00 p.m.** at:

Douglas Visitor Center  
345 16th Street  
Douglas, AZ 85607

The meeting will be conducted in an informal open house format, where project information will be displayed and distributed. The open house format will encourage discussion and information sharing through opportunities for the public to speak one-on-one with GSA representatives. **No formal presentation will be provided.**

In addition to notifying your office of the revised DEIS, the purpose of this letter is to request concurrence from your office regarding GSA's effects determination to federally listed species within the vicinity of the proposed project. GSA has considered your comments and clarified its effect determination with respect to federally listed species in the revised DEIS, to include consideration of the new Alternative 3, as documented below in Table 1. Alternative 3 is located entirely within an existing developed area east of the RHC LPOE, as shown in Figure 1.

#### **Concurrence Request**

We would greatly appreciate your concurrence with GSA's effect determination within 30 days to enable us to complete this phase of the project within the scheduled timeframe. Should you have any immediate questions, concerns, or comments, please contact to Osmahn Kadri at (415) 522-3617 or [osmahn.kadri@gsa.gov](mailto:osmahn.kadri@gsa.gov). Additionally, questions or comments can be mailed to Osmahn Kadri, NEPA Project Manager, General Services Administration, c/o Potomac-Hudson Engineering, Inc., 77 Upper Rock Circle, Suite 302, Rockville, MD 20850.

Sincerely,

U.S. General Services Administration  
50 United Nations Plaza  
San Francisco, CA 94102  
[www.gsa.gov](http://www.gsa.gov)

8/30/2023

**X** Osmahn Kadri

Osmahn Kadri  
NEPA Program Manager  
Signed by: OSMAHN KADRI

Enclosures

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San Francisco, CA 94102  
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Enclosure 1 – Preliminary Effect Determination

**Table 1. Preliminary Effect Determination for Federally Protected Species with Potential to Occur within the Region of Influence**

Species	Status	Habitat	Impact Rating	Potential Impact Summary
Jaguar ( <i>Panthera onca</i> )	Federally endangered	Ranges from tropical forests, lowland scrub and woodland, thorn scrub, desert, swampy savanna, mangrove swamps and marshland. Feeds on large and small mammals, reptiles, and ground nesting birds.	May affect, not likely to adversely affect	While this species is known to pass through areas close to the U.S.-Mexico border, the border fence and the presence of human activity makes it unlikely to encounter jaguars in the ROI, and construction or operation of the Proposed Action would not reduce the overall amount of available suitable habitat. In addition, no jaguars have been observed within 20 miles of the RHC LPOE.
<u>Western yellow-billed</u> cuckoo ( <i>Coccyzus americanus</i> )	Federally threatened	Migratory species; Arizona within breeding range. Nests in deciduous woodlands, moist tickets, orchards, and overgrown pastures.	May affect, not likely to adversely affect	Due to lack of suitable nesting habitat, this species is not expected to reside within the ROI. However, non-resident species may still move through the area. The yellow-billed cuckoo may migrate through the ROI and stop to rest or forage. However, construction and operation of the Proposed Action would not reduce the overall availability of nesting habitat or high-quality foraging habitat.
Northern Mexican gartersnake ( <i>Thamnophis eques magalops</i> )	Federally threatened	Species strongly associated with permanent water with vegetation (e.g., stock tanks, ponds, lakes, riparian woods, etc.).	No effect	The ROI only contains unnamed ephemeral streams that are dry most of the year.
Chiricahua leopard frog ( <i>Rana chiricahuensis</i> )	Federally threatened	Springs, pools, lakes, reservoirs, streams, and rivers.	No effect	Per informal consultation with the USFWS dated December 16, 2022, the most proximate known location for this species is located 2 miles from the proposed Commercial LPOE site. While this is located within potential dispersal distance, there is no suitable dispersal habitat to connect the known location to the project site, and this species has not been recently detected within the ROI. The connecting habitat is occupied by invasive bullfrogs and therefore unusable by Chiricahua leopard frogs. There is no potential for these frogs to be present during project activities. A copy of USFWS correspondence with these findings is included in Appendix B.
Yaqui catfish ( <i>Ictalurus pricei</i> )	Federally threatened	Small to medium rivers with medium to slow currents over gravel/sand substrates.	No effect	The ROI only contains unnamed ephemeral streams that are dry most of the year.
Yaqui chub ( <i>Gila purpurea</i> )	Federally endangered	Deep pools in creeks, springheads, and other stream-associated quiet waters.	No effect	The ROI only contains unnamed ephemeral streams that are dry most of the year.

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Enclosure 2 – Figures of Project Area

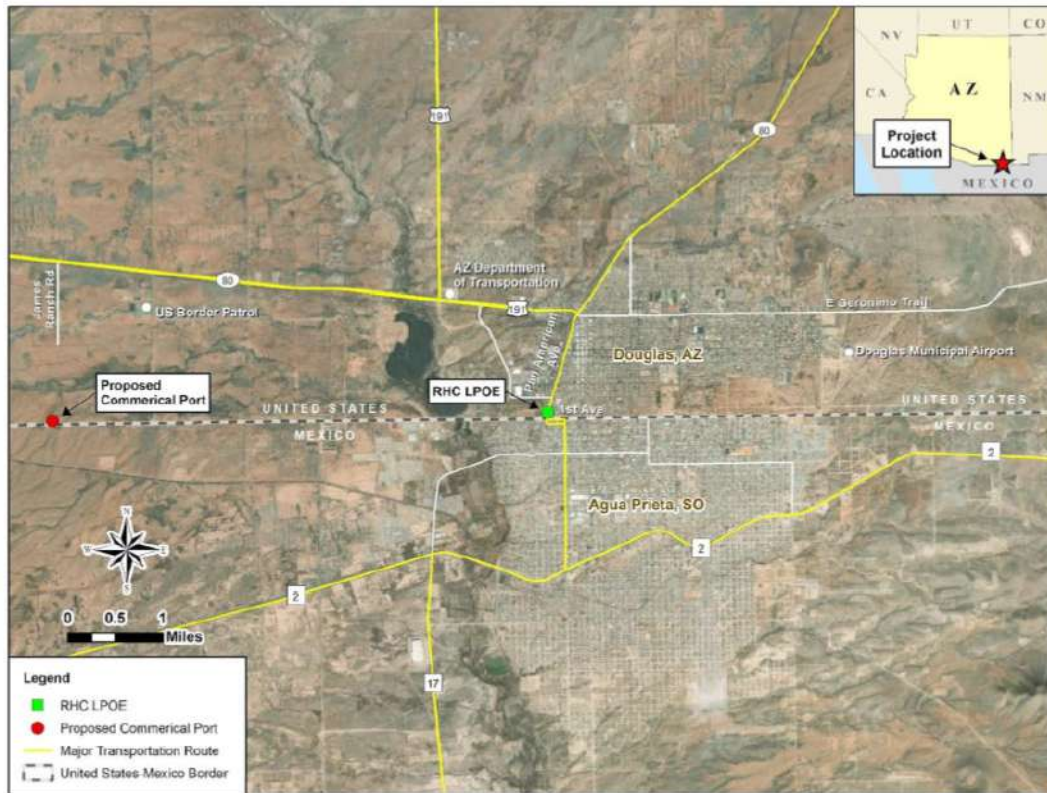


Figure 1. Regional Location of the RHC LPOE and Proposed Commercial LPOE

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Enclosure 2 – Figures of Project Area



Figure 2. Site Location for the Proposed Commercial LPOE

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Enclosure 2 – Figures of Project Area

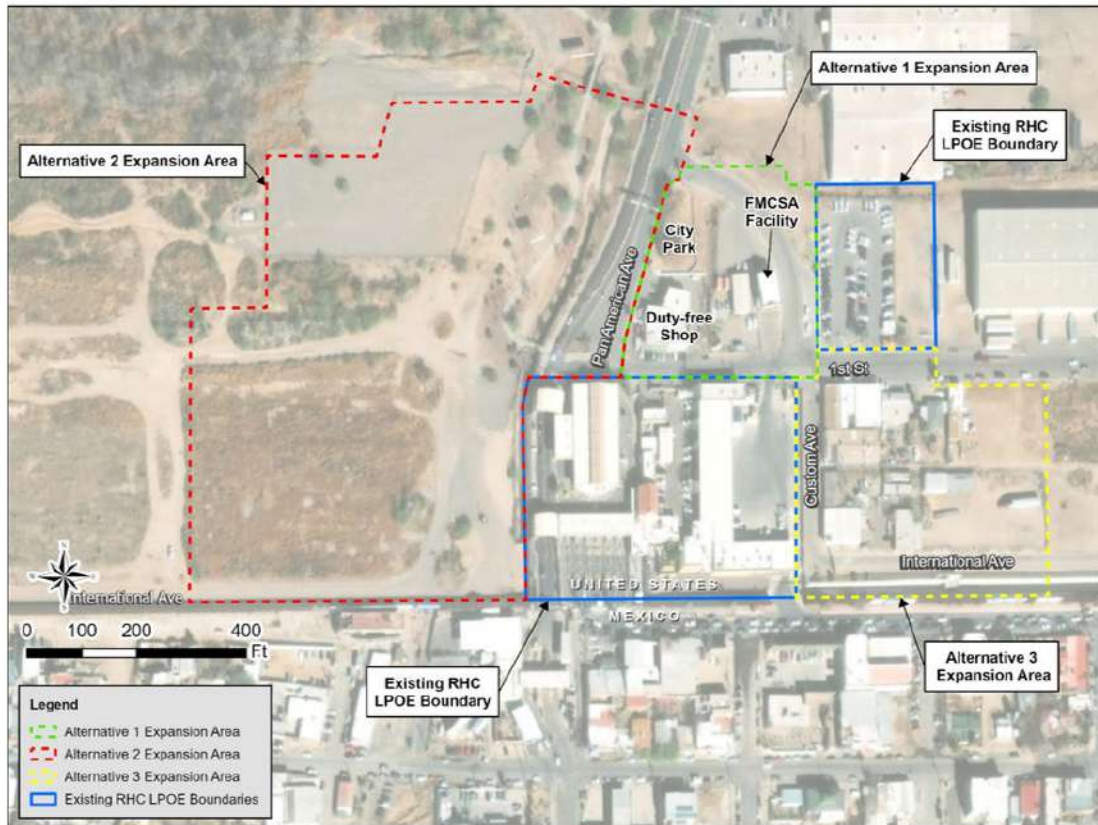


Figure 3. Expansion Areas for Alternatives 1, 2, and 3

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## TRIBAL AND SHPO CONSULTATION



Pacific Rim Region

January 19, 2023

Ms. Kathryn Leonard  
State Historic Preservation Officer  
Arizona State Parks  
1100 West Washington Street  
Phoenix, AZ 85007

Attention: Patricia Dahlen

Re: Bipartisan Infrastructure Law - Reconfiguration and Expansion of the Raul Hector Castro Land Port of Entry and Construction of a New Commercial Port of Entry  
U.S. Inspection Station, Douglas, AZ

Dear Ms. Leonard:

The U. S. General Services Administration (GSA) is considering an undertaking that has the potential to cause an effect to historic properties. The Raul Hector Castro (RHC) Land Port of Entry (LPOE), formerly known as the U.S. Inspection Station, in Douglas, AZ, was listed in the National Register of Historic Places (NRHP) in 2014. As part of the Bipartisan Infrastructure Law (BIL) Construction Projects, GSA is planning the reconfiguration and expansion of the RHC LPOE and the construction of a new commercial port of entry. This undertaking has the potential to affect historic properties and GSA is initiating consultation under 36 CFR 800.3.

Signed into law in 2021, the BIL is a program to modernize and improve 26 LPOEs along the northern and southern borders of the U.S. The RHC LPOE reconfiguration and new commercial port of entry are being funded as part of the BIL program. The RHC LPOE has been determined to no longer function adequately and poses safety and security risks for the Customs and Border Patrol officers and the general public due to the steady increases in traffic, poor pedestrian infrastructure, lack of separations between traffic types (commercial, personal, and pedestrian) and undersized facilities. The last renovations to the RHC LPOE took place in 1993. A Feasibility Study (Line and Space, LLC) was completed on November 25, 2019, and recommended a new standalone commercial port and the modernization of the non-commercial port.

The proposed Undertaking consists of two geographically separate areas. The existing RHC LPOE, consisting of approximately five acres, is located on the east side of Highway 191 (Pan American Avenue) at the U.S./Mexico border in Douglas, AZ. As part of this Undertaking, GSA is considering acquiring the land on the west side of Highway 191 to expand the existing RHC LPOE. The site of the proposed new standalone commercial port is located approximately five

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Kathryn Leonard  
January 19, 2023  
Page 2 of 3

miles west of the existing RHC LPOE off James Ranch Road. The site is largely undeveloped, only consisting of a U.S. Border Patrol Station constructed in 2003. The proposed Area of Potential Effect (APE) for this Undertaking is the boundaries of both existing RHC LPOE with the possible expansion area and the proposed new commercial site off James Ranch Road. **GSA requests the SHPO's concurrence with this APE.**

GSA is currently preparing a draft Environmental Impact Statement (EIS) as part of the ongoing National Environmental Policy Act (NEPA) for the RHC LPOE. The draft EIS evaluates the proposed solution (construction of a new commercial port and expansion and modernization of the existing RHC LPOE) through two action alternatives:

1. Alternative 1: sequential construction of the new commercial port and then phased construction at the existing RHC LPOE. This alternative includes consideration of adaptive reuse of the historic structures at RHC LPOE (Alternative 1a), relocation of historic structures (Alternative 1b), demolition of historic structures (Alternative 1c), or any combination of Alternatives 1a through 1c (Alternative 1d).
2. Alternative 2: Concurrent construction of the new commercial port and phased construction of the RHC LPOE. This alternative includes consideration of adaptive reuse of the historic structures at RHC LPOE (Alternative 2a), relocation of historic structures (Alternative 2b), demolition of historic structures (Alternative 2c), or any combination of Alternatives 2a through 2c (Alternative 2d).

As part of the ongoing NEPA and NHPA efforts, a cultural resources memo was produced by ASM Affiliates (attached). The report identified and documented potential historic resources, evaluated the identified resources for eligibility for listing in the National Register of Historic Places, reviewed the proposed action in the draft EIS, and provided an assessment of impacts and effects. GSA has reviewed the memo and determined that 100 Pan American Avenue, the Pan American and Customs Avenues Public Park Bathroom Building, and the Cattle Operation Building are not eligible for listing in the National Register of Historic Places under any Criteria. **GSA requests the SHPO's concurrence with this determination.**

A Phase I cultural resource survey was conducted as part of the cultural resource memo. The survey identified one new cultural resource site (LPOE-1) and 16 isolated finds within the proposed new commercial port area. GSA has reviewed the information provided regarding LPOE-1 and determined it is not eligible for listing in the National Register of Historic Places under any Criteria. **GSA requests the SHPO's concurrence with this determination.**

A list of Native American tribes has been obtained through the State of Arizona's Government to Government Consultation Toolkit website. GSA will reach out to the contacts identified for each tribe to determine if any attach significance to the areas within the APE or would like to participate in this consultation. Other potential consulting parties include the City of Douglas and the Arizona Preservation Foundation. We will invite the Advisory Council on Historic Preservation to participate in this consultation, and we will notify your office of the response. If you have any additional suggestions for consulting parties that should be invited to participate,


*Kathryn Leonard  
January 19, 2023  
Page 3 of 3*

please let us know. At this time, GSA is completing the draft EIS and entering into a Master Plan study for the RHC LPOE to continue to inform our planning efforts.

By copy of this letter, we are notifying interested parties of our undertaking, our determinations, and soliciting any comments they may have at this point in the process. We look forward to scheduling our first consultation meeting.

GSA seeks your concurrence in our definition of the APE, our determination of historic properties, and our plan for identifying consulting and interested parties. Please review the enclosed documentation and provide GSA with your comments. If you have any questions, please contact us at [R9historicpreservation@gsa.gov](mailto:R9historicpreservation@gsa.gov) or you can call Historic Preservation Specialist Natalie Loukianoff at (628) 224-5682. Thank you for your assistance.

Sincerely,

DocuSigned by:  
  
50912695BAD5477

David Leites  
Supervisory Architect / Acting Regional Historic Preservation Officer

Enclosures

JB:NL

CC VIA EMAIL:

Beth L. Savage, Federal Preservation Officer, General Services Administration  
Laura Lavernia, Advisory Council on Historic Preservation  
Arizona Preservation Foundation  
City of Douglas



Katie Hobbs  
Governor

# ARIZONA

## STATE PARKS & TRAILS

Bob Broscheid  
Executive Director



February 21 2023

Mr. David Leites, Supervisory Architect / Acting Regional Historic Preservation Officer  
US General Services Administration  
50 United Nations Plaza  
Mailbox 9, Room 3411  
San Francisco, CA 94102

Re: Cochise County; Reconfiguration and Expansion of the Raul Hector Castro Land Port of Entry and Construction of a New Commercial Port of Entry; Section 106 Review; US General Services Administration (GSA); SHPO-2023-0070(167446)

Dear Mr. Leites:

Thank you for consulting with our office for review of the report, *Cultural Resources Memo for the Douglas Land Port of Entry Environmental Impact Statement, Douglas, Cochise County, Arizona* (Andrews and Davis 2022) and supporting information. The GSA plans to reconfigure and expand the existing Raul Hector Castro (RHC) Land Port of Entry (LPOE) and construct a new commercial port of entry (the undertaking). The RHC LPOE is listed in the National Register of Historic Places (NRHP). GSA has defined the Area of Potential Effects (APE) as the boundaries of the existing RHC LPOE, a possible expansion area, and the proposed new commercial site off James Ranch Road. This review is conducted pursuant to Section 106 of the National Historic Preservation Act (NHPA), 54 U.S.C. § 306108 and its implementing regulations, 36 CFR Part 800.

SHPO's Historic Properties Program Manager Dr. William Collins, Architect Susan Lawson, and I have reviewed GSA's letter and the accompanying cultural resources memo. We request an expanded definition of the APE before we can concur with it. Specifically, please:

1. Provide dimensions and area of the existing LPOE, the land that might be acquired on the east side of Highway 191, and the standalone commercial port parcel.
2. Indicate whether the maps shown within the cultural resources report (Figures 3 and 5) accurately reflect the APE. If not, please provide maps of the APE.

Regarding determinations of eligibility, GSA has determined that the Pan American and Customs Avenues Public Park Bathroom Building and the Cattle Operation Building are ineligible for inclusion in the NRHP. SHPO concurs. One archaeological site, LPOE-1, a historic trash scatter, was identified within the proposed new commercial port area. GSA has determined that LPOE-1 is ineligible for inclusion in the NRHP. SHPO concurs.

GSA has also determined that 100 Pan American Avenue (Gaytan's Grocery Store) is ineligible for inclusion in the NRHP. **SHPO does not concur.** As described in the cultural report, the building has additions from the 1980s and 1990s "which have obscured the original design with

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both in our parks and through our partners.*



SHPO-2023-0070(167446)

Page 2

the exception of the main facade.” The primary facade is the critical factor, and the presence of additions to what are effectively the rear of the building do not detract from its recognizable historic appearance. The historic context of a Mexican-owned grocery in the Oro Y Plata neighborhood would fall under Criterion A, and these alterations are not significant enough to affect the building’s eligibility under Criterion A. We recommend that GSA consider revising their determination.

SHPO also has the following requests/comments that will aid us in consultation:

1. Please provide a figure of the APE for the current LPOE and the expansion on the east side of US 191 that provides the following:
  - a. Labels for all buildings depicted within the APE, using consistent names and/or addresses
  - b. The boundary of the NRHP-listed LPOE (what is included in the listing)
  - c. The historic status of each building (construction date, eligibility (recommended or previously determined if more than 50 years old). This can be a table.
  - d. A photo key corresponding to the figure and the photos presented in the cultural resources report.
2. There are two alternatives that appear to actually be the same project, but sequenced differently. Within alternatives for the work at the current RHC LPOE site, GSA suggests four subcategories. These are the “alternatives” that SHPO will be interested in looking at closer: A. Adaptive Reuse; B. Relocation; C. Demolition; and D. Combination.
3. Although the archaeological survey methods meet current professional standards, the cultural resources report does not meet current SHPO reporting standards. Please have the consultant review the standards (2016 and interim revision 2019) as well as our recent power point regarding reporting on the significance and eligibility of historic properties located under SHPO Guidance Documents here: <https://azstateparks.com/shpo-consultation-on-historic-preservation-compliance>, and revise the report accordingly. At a minimum, we require:
  - a. A SHPO Abstract
  - b. UTM locator
  - c. Land jurisdiction map specifying the state or federal agency or municipality who has jurisdiction
  - d. Explanation of the site definition used during survey
  - e. Accurate culture historic context. Except for the Historic of Douglas, the cultural and historical overview does not accurately reflect the cultures who inhabited and used this land in the past. It appears to reflect the Tucson Basin, which is more than 100 miles away. Prehistoric resources cannot be adequately evaluated without the proper cultural context.
4. In addition, please have the consultant review the Arizona State Museum’s policy on waste piles; it appears that LPOE-1 may meet the requirements to be recorded as an Isolated Occurrence rather than a site. The policy is located: <https://statemuseum.arizona.edu/crm/document/historical-waste-piles>

SHPO-2023-0070(167446)

Page 3

We look forward to reviewing the revised report and continuing consultation regarding a finding of effect. We appreciate your cooperation in complying with historic preservation requirements for federal undertakings. Please contact me by telephone, 602.542.7141, or via e-mail at [edavis@azstateparks.gov](mailto:edavis@azstateparks.gov), if you have any questions or concerns.

Sincerely,



Erin Davis, M.A.  
Archaeological Compliance Specialist  
State Historic Preservation Office

DocuSign Envelope ID: 8FD9C7C2-4163-4C2C-A926-145D79CE7D75



Pacific Rim Region

January 19, 2023

Chairman Kasey Velasquez  
White Mountain Apache Tribe  
P.O. Box 700  
Whiteriver, AZ 85941

Re: Bipartisan Infrastructure Law - Reconfiguration and Expansion of the Raul Hector Castro Land Port of Entry and Construction of a New Commercial Port of Entry  
U.S. Inspection Station, Douglas, AZ

Dear Chairman Velasquez:

The U. S. General Services Administration (GSA) is considering an undertaking that has the potential to cause an effect to historic properties. The Raul Hector Castro (RHC) Land Port of Entry (LPOE), formerly known as the U.S. Inspection Station, in Douglas, AZ, was listed in the National Register of Historic Places (NRHP) in 2014. As part of the Bipartisan Infrastructure Law (BIL) Construction Projects, GSA is planning the reconfiguration and expansion of the RHC LPOE and the construction of a new commercial port of entry.

Signed into law in 2021, the BIL is a program to modernize and improve 26 LPOEs along the northern and southern borders of the U.S. The RHC LPOE reconfiguration and new commercial port of entry are being funded as part of the BIL program. The RHC LPOE has been determined to no longer function adequately and poses safety and security risks for the Customs and Border Patrol officers and the general public due to the steady increases in traffic, poor pedestrian infrastructure, lack of separations between traffic types (commercial, personal, and pedestrian) and undersized facilities. The last renovations to the RHC LPOE took place in 1993. A Feasibility Study (Line and Space, LLC) was completed on November 25, 2019, and recommended a new standalone commercial port and the modernization of the non-commercial port.

The proposed Undertaking consists of two geographically separate areas. The existing RHC LPOE, consisting of approximately five acres, is located on the east side of Highway 191 (Pan American Avenue) at the U.S./Mexico border in Douglas, AZ. As part of this Undertaking, GSA is considering acquiring the land on the west side of Highway 191 to expand the existing RHC LPOE. The site of the proposed new standalone commercial port is located approximately five miles west of the existing RHC LPOE off James Ranch Road. The site is largely undeveloped, only consisting of a U.S. Border Patrol Station constructed in 2003. The proposed Area of

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San Francisco, CA 94102  
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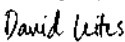
Kasey Velasquez  
January 19, 2023  
Page 2 of 3

Potential Effect (APE) for this Undertaking is the boundaries of both existing RHC LPOE with the possible expansion area and the proposed new commercial site off James Ranch Road.

As part of the ongoing National Environmental Policy Act and National Historic Preservation Act efforts, a cultural resources memo was produced by ASM Affiliates (attached). The report identified and documented potential historic resources, evaluated the identified resources for eligibility for listing in the National Register of Historic Places, reviewed the proposed action in the draft EIS, and provided an assessment of impacts and effects. A Phase I cultural resource survey was conducted as part of the cultural resource memo. The survey identified one new cultural resource site (LPOE-1) and 16 isolated finds within the proposed new commercial port area. GSA has reviewed the information provided regarding LPOE-1 and determined it is not eligible for listing in the National Register of Historic Places under any Criteria. At this time, GSA is completing the draft EIS and entering into a Master Plan study for the RHC LPOE to continue to inform our planning efforts.

Enclosed is the cultural resources memo. Please review this information. If your tribe has a cultural or traditional affiliation on land within this property, and is interested in participating in the consultation, please notify GSA as soon as practicable. If you have any questions, please contact us at R9historicpreservation@gsa.gov or you can call Historic Preservation Specialist Natalie Loukianoff at (628) 224-5682. Thank you for your assistance.

Sincerely,

DocuSigned by:  
  
SD912695BAD5477

David Leites  
Supervisory Architect / Acting Regional Historic Preservation Officer

Enclosures

JB:NL

CC VIA EMAIL:

Beth L. Savage, Federal Preservation Officer, General Services Administration  
Laura Lavernia, Advisory Council on Historic Preservation  
Patricia Dahlen, AZ SHPO  
Ramon Riley, Cultural Resource Repatriation Specialist, White Mountain Apache Tribe

Identical Letters Sent To:

**Fort Sill Apache Tribe**  
Ms. Lori Gooday Ware, Chairwoman  
Route 2, Box 121  
Apache, OK 73006

**Hopi Tribe**  
Timothy L. Nuvangyaoma, Chairman  
P.O. Box 123  
Kykotsmovi, AZ 86039

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*Kasey Velasquez  
January 19, 2023  
Page 3 of 3*

<b>Mescalero Apache Tribe</b> Eddie Martinez, President P.O. Box 227 Mescalero, NM 88340778	<b>Pascua Yaqui Tribe</b> Peter Yucupicio, Chairman 7474 S. Camino de Oeste Tucson, AZ 85746
<b>Pueblo of Zuni</b> Val R. Panteah, Governor P.O. Box 339 Zuni, NM 87327	<b>San Carlos Apache Tribe</b> Terry Rambler, Chairman P.O. Box 0 San Carlos, AZ 85550
<b>Tohono O'odham Nation</b> Ned Norris Jr., Chairman P.O. Box 837 Sells, AZ 85634	<b>White Mountain Apache Tribe</b> Chairman Kasey Velasquez P.O. Box 700 Whiteriver, AZ 85941

----- Forwarded message -----

From: **Natalie Loukianoff - 9PCD** <[natalie.loukianoff@gsa.gov](mailto:natalie.loukianoff@gsa.gov)>  
Date: Mon, Jan 23, 2023 at 4:32 PM  
Subject: Re: Raul Hector Castro Land Port of Entry, Douglas, AZ - Proposed Undertaking  
To: Karl Hoerig <[khoerig@pascuayaqui-nsn.gov](mailto:khoerig@pascuayaqui-nsn.gov)>  
Cc: Beth Savage - PCAB <[beth.savage@gsa.gov](mailto:beth.savage@gsa.gov)>

Hello Karl,

Thank you very much for your response. We truly appreciate the information and will share it appropriately.

You are correct that Alternative 1b has the potential to adversely effect the historic buildings. As part of their memo, the cultural resources consultant provided their assessment of impacts and effects; however GSA has not yet made any determination of effect and we will be conducting a Master Plan Study to explore all of the alternatives before choosing a path forward.

If you have any other questions or information to share, please do not hesitate to reach out. Thank you again.

Respectfully,  
Natalie



**U.S. General Services Administration**

**Natalie Loukianoff**  
Historic Preservation Specialist  
Design and Construction  
Pacific Rim Region  
50 United Nations Plaza  
Mailbox #9, Suite 3411  
San Francisco, CA 94102  
P: 628-224-5682  
[natalie.loukianoff@gsa.gov](mailto:natalie.loukianoff@gsa.gov)

On Mon, Jan 23, 2023 at 10:38 AM Karl Hoerig <[khoerig@pascuayaqui-nsn.gov](mailto:khoerig@pascuayaqui-nsn.gov)> wrote:

Dear Natalie,

Thank you for providing information regarding historic properties that might be affected by the planned expansion of the Raul Hector Castro LPOE in Douglas, Arizona. We do not have any information that suggests that unreported heritage resources of importance to the Pascua Yaqui Tribe are found within the project APE.

However, I would note that I find the "Cultural and Historic Overview" in the cultural resources memo to be deficient. First, the APE is located in an area that was peripheral to the archaeologically-defined Hohokam culture. A more accurate summary of the prehistoric setting would acknowledge this and note the influences of Mogollon in the area surrounding Douglas. Similarly, this area was not historically primarily an O'odham area. It was part of the homeland of the southern, "Chiricahua" Apache people, and focus should be on their history in the area. It is also peripherally associated with the Opatas, relatives of the Yaqui. Whitewater Draw and to the east Black Draw make up parts of the headwaters of the Rio Yaqui, and as such are recognized as Traditional Cultural Properties of the Yaqui. In the late 19<sup>th</sup> century and well into the middle twentieth century, a significant number of Yaqui people lived in and around Douglas, particularly at the Slaughter Ranch where multiple Yaqui families lived and were employed. The improper focus on Hohokam and O'odham and neglect of other cultural groups who have closer historic associations with the APE does not change the determinations regarding effect on historic properties.

I am also unsure about the determination that alternative 1b would not result in adverse affect to historic properties. My understanding of the standards is that moving historic buildings from their original locations does constitute adverse effect. Only alternative 1a (or no action) would result in no adverse effect.

With best regards,

Karl Hoerig

Karl A. Hoerig, Ph.D.  
Tribal Historic Preservation Officer  
Pascua Yaqui Tribe  
7777 S. Camino Huivisim, Building C  
Tucson, AZ 85757  
(520) 883-5116  
[karl.hoerig@pascuayaqui-nsn.gov](mailto:karl.hoerig@pascuayaqui-nsn.gov)

---

**From:** Natalie Loukianoff - 9PCD <[natalie.loukianoff@gsa.gov](mailto:natalie.loukianoff@gsa.gov)>  
**Sent:** Thursday, January 19, 2023 5:11 PM  
**To:** Karl Hoerig <[khoerig@pascuayaqui-nsn.gov](mailto:khoerig@pascuayaqui-nsn.gov)>  
**Cc:** Beth Savage - PCAB <[beth.savage@gsa.gov](mailto:beth.savage@gsa.gov)>  
**Subject:** Raul Hector Castro Land Port of Entry, Douglas, AZ - Proposed Undertaking

**Beware External Email - Think Before You Act.**

Dr. Hoerig,

Please find attached GSA's electronic letter and attachment regarding the proposed Undertaking at the Raul Hector Castro Land Port of Entry in Douglas, AZ as part of the Bipartisan Infrastructure Law. Per the consultation protocol we have sent an original letter to Chairman Peter Yucupicio and have directed an electronic copy with attachments to you.

If you have any questions, please do not hesitate to contact me.

Respectfully,  
Natalie Loukianoff



**U.S. General Services Administration**

**Natalie Loukianoff**  
Historic Preservation Specialist  
Design and Construction  
Pacific Rim Region  
50 United Nations Plaza  
Mailbox #9, Suite 3411  
San Francisco, CA 94102  
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Received from Tribal Admin 02/07/23 WJ  
E-mailed 02/27/23 WJ (date)  
Scanned 02/27/23 WJ (date)

**SAN CARLOS APACHE TRIBE**  
Historic Preservation & Archaeology Department  
P.O. Box 0  
San Carlos Arizona 85550  
Tel. (928) 475-5797, [apachevern@yahoo.com](mailto:apachevern@yahoo.com)

**Tribal Consultation Response Letter**

**Date:** February 7, 2023  
**Contact Name:** David Leites (628) 224-5682  
**Company:** GSA Pacific Rim Region  
**Address:** 50 United Nations Plaza Mailbox 9 Room 3411 San Francisco, CA 94102  
**Project Name/##:** Bipartisan Infrastructure Law – Reconfiguration and Expansion of the Raul Hector Castro Land Port of Entry and Construction of a New Commercial Port of Entry U.S. Inspection Station, Douglas, AZ

**Dear Sir or Madam:**

Under Section 106 and 110 of the National Historic Preservation Act, we are replying to the above referenced project. Please see the appropriate marked circle, including the signatures of Vernelda Grant, Tribal Historic Preservation Officer (THPO), and the concurrence of the Chairman of the San Carlos Apache Tribe:

**NO INTEREST/NO FURTHER CONSULTATION/NO FUTURE UPDATES**

We defer to the Tribe located nearest to the project area.

**CONCURRENCE WITH REPORT FINDINGS & THANK YOU**

**REQUEST ADDITIONAL INFORMATION**

I require additional information in order to provide a finding of effect for this proposed undertaking, i.e. Project description \_\_\_ Map \_\_\_ Photos \_\_\_ Other \_\_\_\_\_

**NO EFFECT**

I have determined that there are no properties of religious and cultural significance to the San Carlos Apache Tribe that are listed on the National Register within the area of potential effect or that the proposed project will have no effect on any such properties that may be present.

**NO ADVERSE EFFECT**


Properties of cultural and religious significance within the area of effect have been identified that are eligible for listing in the National Register for which there would be no adverse effect as a result of the proposed project.

**ADVERSE EFFECT**

I have identified properties of cultural and religious significance within the area of potential effect that are eligible for listing in the National Register. I believe the proposed project would cause an adverse effect on these properties. Please contact the THPO for further discussion.

We were taught traditionally not to disturb the natural world in a significant way, and that to do so may cause harm to oneself or one's family. Apache resources can be best protected by managing the land to be as natural as it was in pre-1870s settlement times. Please contact the THPO, if there is a change in any portion of the project, especially if Apache cultural resources are found at any phase of planning and construction. Thank you for contacting the San Carlos Apache Tribe, your time and effort is greatly appreciated.

**DIRECTOR/THPO:**  02/14/23  
Vernelda J. Grant, Tribal Historic Preservation Officer Date

**CONCURRENCE:**  2/22/23  
Terry Rambler, Tribal Chairman Date





## White Mountain Apache Tribe

Office of Historic Preservation

PO Box 1032

Fort Apache, AZ 85926

Ph: (928) 338-3033 Fax: (928) 338-6055

**To:** David Leites – Supervisory Architect / Acting Regional HPO

**Date:** February 8, 2023

**Re:** *Construction of a New Commercial Port of Entry U.S. Inspections Station*

.....

The White Mountain Apache Tribe Historic Preservation Office appreciates receiving information on the project dated: January 20, 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 Bipartisan Infrastructure Law Reconfiguration and Expansion of the Raul Hector Castro Land Port of Entry and Construction of a new Commercial Port of Entry U.S. Inspection Station, Douglas, Arizona.

Please be advised, we reviewed the consultation letter and the information provided, and we've determined the proposed plans will have "*No Adverse Effect*" on the tribe's cultural heritage resources and/or historic properties.

Thank you for your continued collaborations in protecting and preserving places of cultural and historical importance.

Sincerely,

*Mark Alaha*

White Mountain Apache Tribe – THPO  
Historic Preservation Office



## White Mountain Apache Tribe

Office of Historic Preservation

PO Box 1032

Fort Apache, AZ 85926

Ph: (928) 338-3033 Fax: (928) 338-6055

**To:** Osmahn Kadri, RHC LPOE EIS U.S. General Services Administration

**Date:** March 02, 2023

**Re:** *Draft EIS to Expand/Modernize the Raul Hector Castro LPOE*

.....

The White Mountain Apache Tribe Historic Preservation Office appreciates receiving information on the project dated: January 27, 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 expansion and modernization of the RHC LPOE and construction of a new Commercial LPOE, in Douglas, Cochise County, Arizona.

Please be advised, we reviewed the consultation letter and the information provided, and we've determined the proposed plans will have "*No Adverse Effect*" on the tribe's cultural heritage resources and/or historic properties.

Thank you for your continued collaborations in protecting and preserving places of cultural and historical importance.

Sincerely,

*Mark Alaha*

White Mountain Apache Tribe – THPO  
Historic Preservation Office

## APPENDIX C – GENERAL CONFORMITY ANALYSIS

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## APPENDIX C. GENERAL CONFORMITY ANALYSIS

### C.1 INTRODUCTION

The General Conformity Rule (GCR) was established to ensure that federal activities do not hamper local efforts to control air pollution. In particular, the GCR implements Section 176(c) of the Clean Air Act (CAA), which prohibits federal agencies from engaging in, supporting, licensing, or approving any action that does not conform to an approved state or federal implementation plan. The purpose of the GCR Applicability Analysis is to determine whether any alternative for the Proposed Project is subject to the federal GCR. The General Services Administration's (GSA) Proposed Project involves construction of a new Commercial Land Port of Entry (LPOE) on an approximate 80.5-acre site and expansion and modernization of the existing Raul Hector Castro (RHC) LPOE from its current footprint of 6 acres to as many as 23 acres. Under Alternative 1, the two sites would be developed sequentially, with construction of the new Commercial LPOE occurring first followed by expansion of the RHC LPOE. Under Alternatives 2 and 3, construction activities would take place concurrently at both sites, and the expanded RHC LPOE would occupy a larger footprint; however, the size of buildings and level of operations would be the same as under Alternative 1. The increased expansion area could allow for larger, more expanded level of operations at the RHC LPOE in the future; however, such an expansion in operations beyond that described in Alternative 1 would require additional NEPA analysis.

The alternatives would result in emissions from the use of construction equipment, passenger vehicles, and trucks during construction and land preparation activities, as well as fugitive dust emissions. Emissions of nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (PM<sub>10</sub>), particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers (PM<sub>2.5</sub>), and sulfur dioxide (SO<sub>2</sub>) were calculated. These calculations demonstrate that the emissions resulting from Alternatives 1, 2, or 3 would be below the *de minimis* levels defined for those pollutants in the Applicability Section of the GCR and would not be regionally significant. Therefore, the GCR is not applicable to the Proposed Project.

### C.2 GENERAL CONFORMITY RULE APPLICABILITY ANALYSIS

The purpose of this analysis is to determine whether Alternatives 1, 2, or 3 at the proposed Commercial LPOE and RHC LPOE are subject to the federal GCR established in 40 Code of Federal Regulations, Part 93 (40 CFR Part 93), Determining Conformity of Federal Actions to State or Federal Implementation Plans. This analysis will determine whether alternatives for the Proposed Project:

- Are not subject to the rule – The action does not emit criteria pollutants or precursors for which the area is designated as a *nonattainment* or maintenance area; all procurement actions are excluded from the GCR;
- Are exempt or do not exceed *de minimis* levels – Emissions from the action are below *de minimis* levels and are not regionally significant, or the action is exempt; or
- Exceed *de minimis* levels or are regionally significant – Emissions from the action exceed *de minimis* levels; a Conformity Determination must be prepared for such actions.

This analysis is organized into the following sections:

- Background (Section C.3) – Information on applicable air emission programs and limitations, including *de minimis* levels;
- Alternatives (Section C.4) – A description of Alternatives 1, 2, and 3;
- Methodology and Emissions Calculations (Section C.5) – Procedures and results for estimating emissions associated with Alternatives 1, 2, and 3; and
- Conclusion (Section C.6) – Determination of whether the GCR is applicable to any of the alternatives.

### C.3 BACKGROUND

As part of the implementation of the CAA Amendments, the USEPA issued National Ambient Air Quality Standards (NAAQS) for six criteria air pollutants: CO, SO<sub>2</sub>, particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), ozone (O<sub>3</sub>), NO<sub>2</sub>, and lead (Pb). USEPA defines ambient air in guidelines established in 40 CFR Part 50 as “that portion of the atmosphere, external to buildings, to which the general public has access.”

The Clean Air Act divides the U.S. into geographic areas called “air quality control regions” (AQCRs). These AQCRs are established areas such as counties, urbanized areas, and consolidated metropolitan statistical areas. An AQCR in which levels of a criteria air pollutant meet the health-based NAAQS is defined as an attainment area for the pollutant, while an area that does not meet the NAAQS is designated a *nonattainment* area for the pollutant. An AQCR that was once designated a *nonattainment* area but was later reclassified as an *attainment* area is known as a maintenance area. *Nonattainment* and maintenance areas can be further classified as extreme, severe, serious, moderate, or marginal.

An AQCR may have an acceptable level for one criteria air pollutant but may have unacceptable levels for other criteria air pollutants. Thus, an area could be *attainment*, maintenance, and/or *nonattainment* at the same time for different pollutants. Each state that contains at least one nonattainment air quality control region is responsible for submitting a State Implementation Plan (SIP), which specifies the manner in which NAAQS will be achieved and maintained. Maintenance areas must adhere to a maintenance plan for the specific pollutant for which the area was initially designated *nonattainment*.

The RHC LPOE and proposed Commercial LPOE sites are located in Cochise County, Arizona. Within Arizona, air quality is managed by the Arizona Department of Environmental Quality (ADEQ), which administers air quality rules and programs for the state. USEPA has designated the Paul Spur/Douglas Planning Area as a nonattainment area for PM<sub>10</sub>. In addition, Douglas has been designated a maintenance area for SO<sub>2</sub> (USEPA 2022a). The Arizona State Implementation Plan was initially approved in 1972 and is revised as needed to comply with new federal or state requirements when new data improves modeling techniques, when a specific area’s attainment status changes, or when an area fails to reach attainment (ADEQ 2022a). ADEQ is developing a nonattainment State Implementation Plan (SIP) to improve the air quality in this area. The plan will include an updated emissions inventory, modeling demonstration, strategy for exceptional events and rules for PM<sub>10</sub> controls (ADEQ 2022b).

Because the Proposed Project is located within a *nonattainment* area for PM<sub>10</sub> and a maintenance area for SO<sub>2</sub>, an applicability analysis is required using the criteria for a *nonattainment* and maintenance area. Therefore, potential emissions for these criteria pollutants were calculated and compared to the corresponding *de minimis* rates. For purposes of analysis and completeness, potential CO, PM<sub>2.5</sub>, and NO<sub>x</sub> emissions were also calculated. Note that ozone is a secondary pollutant that is not emitted directly but is created when NO<sub>2</sub> reacts with volatile organic compounds (VOCs) and oxygen in the presence of sunlight. Therefore, direct ozone emissions were not estimated; VOC emissions were estimated instead of ozone. Emissions of lead were also not analyzed because no project activity would result in lead emissions.

The criteria used in the GCR applicability analysis are listed in the Applicability Section of the GCR, Section 93.153(b), which defines *de minimis* emission rates for criteria pollutants based on the degree of *nonattainment*. Table C-1 lists the *de minimis* levels that were used in this analysis (USEPA 2017). Section 51.853(i) of the GCR stipulates that a project is considered regionally significant when total emissions from the project exceed a *nonattainment* or maintenance area’s total emission budget for each applicable pollutant by 10 percent or more.



**Table C-1. De Minimis Levels for Alternatives 1, 2, and 3**

Criteria Pollutant	CAA Designation for the Project Area	De Minimis Emission Rate (tons/year)
CO	Attainment	100
NO <sub>2</sub>	Attainment	100
O <sub>3</sub>	Attainment	100
SO <sub>2</sub>	Maintenance	100
PM <sub>10</sub>	Nonattainment (moderate)	100
PM <sub>2.5</sub>	Attainment	100

Source: USEPA 2022a; USEPA 2022b

Note: CO = carbon dioxide; NO<sub>2</sub> = nitrogen dioxide; O<sub>3</sub> = ozone; PM<sub>2.5</sub> = particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers; PM<sub>10</sub> = particulate matter with an aerodynamic diameter less than or equal to 10 micrometers; SO<sub>2</sub> = sulfur dioxide.

## C.4 DESCRIPTION OF ALTERNATIVES

### **Alternative 1 – Sequential Construction**

Under Alternative 1, GSA proposes a two-port solution that would separate the processing of commercial and non-commercial traffic to alleviate the inadequacies of the existing RHC LPOE. This alternative would consist of two main components:

- 1) **Construction of a new Commercial LPOE** – A new, dedicated LPOE would be constructed to process only COVs. The first stage of this alternative would be to construct a new Commercial LPOE at a site located approximately 5 miles west of the RHC LPOE; and
- 2) **Expansion and Modernization of the Existing RHC LPOE to a Non-Commercial LPOE** – After construction of the proposed Commercial LPOE is complete, the existing RHC LPOE would be expanded and modernized. The expanded and modernized facility would be dedicated to processing only POVs and pedestrians.

The proposed Commercial LPOE site occupies approximately 80.5 acres. Construction of the proposed Commercial LPOE is estimated to begin in 2025, with substantial completion anticipated in 2028. Construction would be expected to take place over an approximate 48- to 54-month period and construction activities would occur within hours that are in accordance with local noise ordinances. Peak construction (up to 2 years) would require a potential maximum of 100 construction workers and 150 trucks per day for deliveries and waste removal. During non-peak construction, approximately 50 workers would be onsite. All construction and demolition waste would be disposed and recycled at authorized facilities.

The existing RHC LPOE encompasses approximately 6.1 acres, including a separate parking area. The Alternative 1 Expansion Area is a 2.7-acre property adjacent to the north of the port and west of the separate parking area. Expansion and modernization of the existing RHC LPOE would begin after the proposed Commercial LPOE is complete. Following expansion and modernization, the existing RHC LPOE would be dedicated to processing only non-commercial vehicles (cars, vans, and buses) and pedestrians. Construction at the RHC LPOE is estimated to begin in 2028, with substantial completion anticipated in 2031. Construction would be expected to take place over an approximate 36- to 42-month period, and demolition and construction activities would occur within hours that are in accordance with local noise ordinances. Peak construction (up to 2 years) would require a potential maximum of 100 construction workers and 150 trucks per day for deliveries and waste removal. During non-peak construction, approximately 50 workers would be onsite. All construction and demolition waste would be handled in accordance with federal, state, and local regulations and disposed or recycled at authorized facilities.

Alternative 1 includes four sub-alternatives for the handling and disposition of the existing historic Main Building and Garage at the RHC LPOE, which are listed on the National Register of Historic Places. Activities associated with the sub-alternatives would occur during the same construction window and are included within the estimates for equipment, personnel, and vehicles listed for Alternative 1.

### ***Alternative 2 – Concurrent Construction (Westward Expansion)***

Construction for the Commercial LPOE would occur at the same location as for Alternative 1. To expedite construction for the purpose of achieving cost and time efficiencies, GSA proposes in Alternative 2 to construct the commercial and non-commercial facilities concurrently. The acquisition of an additional expansion area would allow the RHC LPOE to operate as usual, while construction activities for the proposed Commercial LPOE and for the expansion and modernization of the RHC LPOE would occur at the same time. Construction activities at each site would be similar to Alternative 1; however, the RHC LPOE footprint would be expanded to an adjacent 13.9-acre property west of the port in addition to the existing port and Alternative 1 Expansion Area. As under Alternative 1, a multi-phase construction plan would be implemented to ensure minimal disruption to the port's daily operations as well as safety to employees and the public.

Under Alternative 2, construction of the proposed Commercial LPOE and at the RHC LPOE is estimated to begin in 2025, with substantial completion anticipated in 2028. Construction would be expected to take place over an approximate 48- to 54-month period and construction activities would occur within hours that are in accordance with local noise ordinances. Peak construction (up to 2 years) would require a potential maximum of 100 construction workers and 150 trucks per day at each project location for deliveries and waste removal (i.e., 200 construction workers and 300 trucks per day at both the existing RHC LPOE and Commercial LPOE sites). During non-peak construction, approximately 50 workers would be onsite at each project location (i.e., 100 construction workers at both sites). All construction and demolition waste would be handled in accordance with federal, state, and local regulations and disposed or recycled at authorized facilities.

Sub-alternatives for the handling and disposition of the existing historic Main Building and Garage at the RHC LPOE would fall within the same parameters as for construction in Alternative 1. After completion of construction, both LPOE locations would operate the same as in Alternative 1.

### ***Alternative 3 – Concurrent Construction (Eastward Expansion)***

Construction for the Commercial LPOE would occur at the same location as for Alternative 1. Alternative 3 would be comparable to Alternative 2 except that the expansion would occur primarily to the east of the existing RHC LPOE on an adjacent 4.4-acre property in addition to the existing port and Alternative 1 Expansion Area. Under Alternative 3, the RHC LPOE would continue to operate as usual, while construction activities for the proposed Commercial LPOE and for the expansion and modernization of the RHC LPOE would occur at the same time. As under Alternatives 1 and 2, a multi-phase construction plan would be implemented to ensure minimal disruption to the port's daily operations, as well as safety to employees and the public.

Construction of the proposed Commercial LPOE and at the RHC LPOE under Alternative 3 would occur during a similar time frame, would be subject to the same requirements, and would require a similar number of construction workers and vehicles as described for Alternative 2. Sub-alternatives for the handling and disposition of the existing historic Main Building and Garage at the RHC LPOE would fall within the same parameters as for construction in Alternative 1. After completion of construction, both LPOE locations would operate the same as for Alternative 1.

## C.5 METHODOLOGY AND EMISSIONS CALCULATIONS

USEPA has designated the Paul Spur/Douglas Planning Area as a nonattainment area for PM<sub>10</sub>. In addition, Douglas has been designated a maintenance area for SO<sub>2</sub> (USEPA 2022a). This applicability analysis developed estimates of the Alternatives' potential emissions of PM<sub>10</sub> and SO<sub>2</sub>; for completeness, potential CO, NO<sub>x</sub>, PM<sub>2.5</sub>, and VOC emissions were also estimated. Emissions were estimated for construction activities that would occur within the project boundary, as well as operations of the upgraded facilities.

### **Construction**

Construction activities would cause temporary air emissions from the following sources:

- Fuel combustion in construction equipment, worker vehicles, and delivery and disposal trucks; and
- Fugitive dust emissions from ground-disturbing activities.

Construction emissions were estimated for on-road and nonroad vehicles. The emissions from on-road vehicles such as privately-owned vehicles (POVs) were estimated using industry standard emission rates (Argonne National Laboratory 2013). Emission rates for nonroad vehicles such as excavators, cranes, graders, backhoes, and bulldozers were estimated using USEPA's MOVES 2014b model (USEPA 2015). Fugitive dust emissions were estimated using USEPA's AP-42 emissions factors. See Table C-2 for the emission factors used in the analysis.

To provide a worst-case (i.e., conservative) estimate of emissions on a calendar-year basis, it was assumed that all required nonroad vehicles would be operating full-time (i.e., eight hours per day and five days per week). The types and quantities of construction equipment and the number of operating days as well as the number of workers and trucks were derived from other, similar projects. Additionally, it was assumed that workers would be commuting a total of 20 miles each day, and each worker would be driving their own vehicle (i.e., no carpooling). To estimate fugitive dust emissions, it was assumed that no area would be continuously disturbed for more than 2 months. In practice, some areas would be disturbed for longer periods of time while others would experience much less disturbance.

Tables C-3 and C-4 present estimated construction emissions under Alternative 1 for the Commercial LPOE and the RHC LPOE respectively. Since construction of the two facilities would occur sequentially, these emissions would not occur at the same time and are presented separately. Sub-alternatives 1a through 1d would occur within the same construction window and employ the same resources as Alternative 1. The estimates presented below include air emissions and greenhouse gas emissions associated with demolition of existing structures at the RHC LPOE (to include sub-alternative 1c as a worst-case scenario); impacts from the other sub-alternatives would likely be lower.

**Table C-2. Nonroad and On-Road Emissions Factors**

Source	Emission Factor Units	Pollutant					
		CO	NO <sub>2</sub>	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	VOC
<b>Non-road Construction Equipment</b>							
Construction equipment, gasoline	g/day/unit	795.0	7.44	0.019	6.21	5.72	14.0
Construction equipment, diesel	g/day/unit	160.0	300.0	0.507	23.1	22.4	-
<b>On-road Vehicles</b>							
Passenger cars, gasoline	g/mile	2.866	0.121	0.006	0.034	0.019	0.170
Passenger trucks, gasoline	g/mile	5.019	0.313	0.007	0.053	0.032	0.283
Commercial trucks, diesel	g/mile	1.036	1.019	0.008	0.107	0.054	0.079

Source: Argonne National Laboratory 2013; USEPA 2015

Note: CO = carbon dioxide; g = grams; NO<sub>2</sub> = nitrogen dioxide; PM<sub>2.5</sub> = particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers; PM<sub>10</sub> = particulate matter with an aerodynamic diameter less than or equal to 10 micrometers; SO<sub>2</sub> = sulfur dioxide; VOC = volatile organic compounds.

**Table C-3. Construction Emissions Under Alternative 1 – Commercial LPOE**

Source	Criteria Pollutant Emissions (tons)					
	CO	NO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC
Construction Equipment	0.80	1.45	0.11	0.11	0.00	0.14
Worker Vehicles	9.59	0.53	0.11	0.06	0.02	0.55
Delivery and Waste Trucks	6.30	6.20	0.65	0.33	0.05	0.48
Fugitive Dust	-	-	59.11	31.70	-	-
<b>Total</b>	<b>16.69</b>	<b>8.18</b>	<b>59.98</b>	<b>32.20</b>	<b>0.06</b>	<b>1.18</b>
<i>De minimis Threshold</i>	<i>100</i>	<i>100</i>	<i>100</i>	<i>100</i>	<i>100</i>	<i>100</i>

Note: CO = carbon dioxide; NO<sub>2</sub> = nitrogen dioxide; PM<sub>2.5</sub> = particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers; PM<sub>10</sub> = particulate matter with an aerodynamic diameter less than or equal to 10 micrometers; SO<sub>2</sub> = sulfur dioxide; VOC = volatile organic compounds.

**Table C-4. Construction Emissions Under Alternative 1 – RHC LPOE Expansion**

Source	Criteria Pollutant Emissions (tons)					
	CO	NO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC
Construction Equipment	0.44	0.81	0.06	0.06	0.00	0.44
Worker Vehicles	7.99	0.44	0.09	0.05	0.01	7.99
Delivery and Waste Trucks	6.30	6.20	0.65	0.33	0.05	6.30
Fugitive Dust	-	-	12.00	6.44	-	-
<b>Total</b>	<b>14.74</b>	<b>7.45</b>	<b>12.80</b>	<b>6.88</b>	<b>0.06</b>	<b>14.74</b>
<i>De minimis Threshold</i>	<i>100</i>	<i>100</i>	<i>100</i>	<i>100</i>	<i>100</i>	<i>100</i>

Note: CO = carbon dioxide; NO<sub>2</sub> = nitrogen dioxide; PM<sub>2.5</sub> = particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers; PM<sub>10</sub> = particulate matter with an aerodynamic diameter less than or equal to 10 micrometers; SO<sub>2</sub> = sulfur dioxide; VOC = volatile organic compounds.

Table C-5 presents estimated construction emissions for Alternative 2. Under this alternative, impacts from construction of the Commercial LPOE and expansion and modernization of the RHC LPOE would individually be similar as those discussed under Alternative 1. However, because construction activities would occur simultaneously, the overall period of impact would be shortened, but air emissions during the period of construction would potentially be higher. Sub-alternatives 2a through 2d would occur within the same construction window and employ the same resources as Alternative 2. The estimates presented below include air emissions and greenhouse gas emissions associated with demolition of existing structures at the RHC LPOE (to include sub-alternative 2c as a worst-case scenario); impacts from the other sub-alternatives would likely be lower.

**Table C-5. Construction Emissions Under Alternative 2**

Source	Criteria Pollutant Emissions (tons)					
	CO	NO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC
Commercial LPOE	16.69	8.18	59.98	32.20	0.06	1.18
RHC LPOE	14.74	7.45	12.80	6.88	0.06	14.74
<b>Total</b>	<b>31.43</b>	<b>15.63</b>	<b>72.78</b>	<b>39.09</b>	<b>0.13</b>	<b>1.17</b>
<i>De minimis Threshold</i>	<i>100</i>	<i>100</i>	<i>100</i>	<i>100</i>	<i>100</i>	<i>100</i>

Note: CO = carbon dioxide; NO<sub>2</sub> = nitrogen dioxide; PM<sub>2.5</sub> = particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers; PM<sub>10</sub> = particulate matter with an aerodynamic diameter less than or equal to 10 micrometers; SO<sub>2</sub> = sulfur dioxide; VOC = volatile organic compounds.

Under Alternative 3, impacts from construction of the Commercial LPOE would be the same as described for Alternative 1, and impacts from expansion and modernization of the RHC LPOE would be comparable to those discussed under Alternative 2. Because the Alternative 3 Expansion Area contains existing buildings that would be demolished and require debris removal, there would be a slight increase in construction-related emissions attributable to those activities. However, Alternative 3 would have a smaller footprint for land disturbance in the expansion area than Alternative 2, which would cause a slight decrease in PM<sub>10</sub> emissions following demolition.

**Operations**

Under Alternative 1, even though the Commercial LPOE would begin operations before the expanded RHC LPOE, once the RHC LPOE is operational air emissions from both facilities would occur concurrently. Therefore, operational impacts to air quality are discussed together for the two facilities to present a conservative assessment of impacts.

Air quality impacts from operations of the proposed Commercial LPOE and the expanded RHC LPOE under Alternative 1 were estimated for employee commuting. Approximately 150 additional employees may be needed to operate the Commercial LPOE and the expanded RHC LPOE. To present a conservative analysis in the event additional staff are hired, this analysis assumes up to 180 additional employees could be hired and would commute 20 miles each day. On-road emissions factors shown in Table C-2 were used to estimate employee commuting emissions, which are shown in Table C-6.

**Table C-6. Estimated Annual Air Emissions from Employee Commuting under Alternative 1**

Source	Criteria Pollutant Emissions (tons per year)					
	CO	NO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOCs
Commercial LPOE	6.65	0.37	0.07	0.04	0.01	0.38
RHC LPOE	5.12	0.28	0.06	0.03	0.01	0.29
<b>Total</b>	<b>11.77</b>	<b>0.65</b>	<b>0.13</b>	<b>0.08</b>	<b>0.02</b>	<b>0.68</b>

Note: CO = carbon dioxide; NO<sub>2</sub> = nitrogen dioxide; PM<sub>2.5</sub> = particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers; PM<sub>10</sub> = particulate matter with an aerodynamic diameter less than or equal to 10 micrometers; SO<sub>2</sub> = sulfur dioxide; VOC = volatile organic compounds.

Operations under Alternative 1 would also likely have some beneficial impacts on air quality from a reduction in the wait time for vehicles to be processed by a CBP officer. For purposes of this analysis, an approximate 4-minute reduction in average vehicle wait times was used to calculate emission reductions. The estimated reduction in idling emissions is presented in Table C-7 and would more than offset any increase in emissions from employee commuting.

**Table C-7. Estimated Average Annual Reduction in POV Idling Air Emissions**

Source	Criteria Pollutant Emissions (tons per year)					
	CO	NO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOCs
Current Conditions (34 minute average wait time) <sup>1</sup>	869.32	43.16	14.65	13.17	-	-
Alternative 1 (30 minutes or lower wait time) <sup>2</sup>	767.05	38.08	12.92	11.62	-	-
<b>Reduction in Idling Emissions</b>	<b>102.27</b>	<b>5.08</b>	<b>1.72</b>	<b>1.55</b>	<b>-</b>	<b>-</b>

1. Representative average wait time during peak traffic, for POVs traveling inbound to the U.S.

2. Port redesign goals at the RHC LPOE are to limit maximum wait times to 30 minutes or less.

Note: Emissions factors for SO<sub>2</sub> and VOCs were not available.

CO = carbon monoxide; NO<sub>2</sub> = nitrogen dioxide; PM<sub>2.5</sub> = particulate matter of diameter 2.5 microns or less; PM<sub>10</sub> = particulate matter of diameter 10 microns or less; SO<sub>2</sub> = sulfur dioxide; VOC = volatile organic compounds

It should be noted that maximum vehicle wait time reductions could be much greater (as much as 22 minutes and 35 seconds). Notably, COV inbound traffic wait times (currently 42 minutes and 49 seconds) are expected to improve substantially with establishment of a new Commercial LPOE. Therefore, emissions reductions may actually be greater in the long term.

Other direct (onsite) source of air emissions would include emergency generators and boilers for heating and hot water. Since the specifications for these emissions sources are not known, they are discussed qualitatively below. However, air emissions from these sources would likely range from negligible to minor and would not contribute to any *de minimis* thresholds being exceeded. Any new air emissions sources would be registered or permitted, as required by applications regulations.

- Onsite emergency generators, which would likely be fired by diesel or natural gas – The RHC LPOE currently has two emergency generators onsite. Per the 2019 Feasibility Study, the proposed Commercial LPOE would likely have one emergency generator for the Main Building and a second emergency generator for the Commercial Inspection/Staging area. The expanded RHC LPOE would include an Emergency Generator Yard with likely two generators onsite to provide backup power. The increase in number of emergency generators across the two facilities under Alternative 1 would likely contribute to a negligible increase in air emissions, both during emergency situations as well as from periodic testing and maintenance.

- Boilers for building heat and domestic hot water, either oil or gas fired depending on final design – The new facilities taken together, including the Commercial LPOE and the expanded RHC LPOE, would consist of approximately 306,000 gross square feet of building space, which is considerably larger than the existing RHC LPOE. Therefore, fuel use and air emissions from onsite boilers would likely increase. However, GSA intends to design the new facilities to meet sustainable building standards including a minimum of LEED Gold; therefore, some of the increase in fuel use for heating would be offset by improved building efficiency. The LEED rating system allows for flexibility in how projects choose to meet the number of points required to obtain a given certification level. Therefore, the actual energy performance of the new building would likely not be known until building design is substantially completed.

Because operations under Alternatives 2 and 3 would be essentially the same as for Alternative 1, impacts to air quality from operations of the Commercial LPOE and the RHC LPOE would be comparable to those discussed under Alternative 1.

## **C.6 CONCLUSION**

As shown in Tables C-3 through C-7 and the discussion throughout Section C.5, none of the criteria pollutant emissions estimated for Alternatives 1, 2, or 3 would exceed their respective *de minimis* thresholds. Therefore, the General Conformity Rule is not applicable to any alternatives for the Proposed Project.

## C.7 REFERENCES

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## **APPENDIX D – FLOODPLAIN ASSESSMENT AND STATEMENT OF FINDINGS**

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## APPENDIX D FLOODPLAIN ASSESSMENT AND STATEMENT OF FINDINGS

### D.1 INTRODUCTION

In accordance with 44 Code of Federal Regulations (CFR) Part 9 (*Floodplain Management and Protection of Wetlands*), Executive Order (EO) 11988 (*Floodplain Management*), and General Services Administration (GSA) Order 1095.8 (*Public Buildings Service [PBS] Floodplain Management*), GSA is required to take action to reduce the risk of flood loss and to avoid, to the extent possible, the long- and short-term adverse impacts associated with the occupancy and modification of floodplains and the direct or indirect support of floodplain development wherever there is a practicable alternative. If no practicable alternative exists, then GSA is required to provide justification for no practicable alternatives and evaluate the potential impacts on the floodplain.

GSA is proposing to expand and modernize the Raul Hector Castro (RHC) Land Port of Entry (LPOE) and construct a new Commercial LPOE in Douglas, Arizona. The Environmental Impact Statement (EIS) for this project evaluates the potential adverse impacts to floodplains (see Section 3.6 of the EIS). Based on a review of FEMA mapping, the proposed site for the new Commercial LPOE would not be located within a 100- or 500-year floodplain. However, portions of the delineated area for the RHC LPOE project are located in 100- and 500-year floodplains. Accordingly, this Floodplain Assessment and Statement of Findings has been prepared in accordance with EO 11988 and under the guidance outlined in GSA's *PBS Desk Guide for Floodplain Management*. This assessment is being distributed to appropriate government agencies and other interested parties for review and comments as part of the Draft EIS 45-day comment period. Comments received during the comment period will be considered in the Final EIS and floodplain assessment.

As defined in 44 CFR Part 9A, a critical action is any activity or action for which even a slight chance of flooding would be too great. According to GSA's *PBS Floodplain Management Desk Guide*, the Proposed Action would qualify as a critical action, as damage or disruption from a local flooding event at the RHC LPOE could lead to regional or national catastrophic impacts (e.g., the LPOE being closed for a period following a storm event would have an impact on transportation of goods nationally). As such, the minimum floodplain of concern for critical actions is the 500-year floodplain (also known as the critical action floodplain). GSA will analyze the Proposed Action as a critical action, as required by EO 11988 and GSA's *PBS Floodplain Management* policy.

### D.2 PROJECT DESCRIPTION

GSA's mission includes the custody and control of federal buildings, including U.S. LPOEs. As part of this mission, GSA designs, constructs, manages, maintains, and retains custody and control of 122 of the 167 U.S. LPOEs, including the RHC LPOE. The RHC LPOE is a port of entry for vehicles and pedestrians crossing the U.S.-Mexico border between Douglas, Arizona and Agua Prieta, Sonora in Mexico. The port is operated by the U.S. Department of Homeland Security's Customs and Border Protection (CBP), and is a full-service, multi-modal facility where CBP officers inspect commercially owned vehicles, privately owned vehicles, and pedestrians. The port has been operating since 1914, with existing facilities constructed in the 1930s. Due to steady increases in traffic, poor pedestrian infrastructure, lack of separations between traffic types, and undersized facilities at the end of their functional life, the facilities at the RHC LPOE no longer function adequately and pose safety and security risks for CBP officers and the general public. The existing RHC LPOE has spatial constraints, with limited interior space for offices and processing and limited opportunity for expansion within its current footprint. The City of Douglas has also expressed concerns with hazardous materials utilized in the mining industry being transported across the border in commercial trucks and passing through the urban core of their community. To address these varied concerns, the Proposed Action is to expand and modernize the existing RHC LPOE and construct a new Commercial LPOE approximately 5 miles west of the existing facilities.

The Proposed Action is defined as the expansion and modernization of the existing RHC LPOE and construction of a new Commercial LPOE, as follows:

- 1) **Construction of a new Commercial LPOE** – A new, dedicated LPOE would be constructed to process only COVs at an undeveloped site located approximately 5 miles west of the RHC LPOE; and
- 2) **Expansion and Modernization of the Existing RHC LPOE to a Non-Commercial LPOE** – The existing RHC LPOE would be expanded and modernized. This non-commercial facility would be dedicated to processing only POVs and pedestrians.

Three action alternatives are being considered. *Alternative 1 – Sequential Construction*, would include construction of a new Commercial LPOE first, followed by a phased expansion and modernization of the existing RHC LPOE after the Commercial LPOE is operational. *Alternative 2 – Concurrent Construction (Westward Expansion)*, would include construction of the new Commercial LPOE and phased modernization of the existing RHC LPOE at the same time with expansion to adjacent land west of the port. *Alternative 3 – Concurrent Construction (Eastward Expansion)*, would include construction of the new Commercial LPOE and phased modernization of the existing RHC LPOE at the same time with expansion to adjacent land east of the port.

As illustrated in Figure 1, all three alternatives would require the acquisition of land near the RHC LPOE; however, Alternatives 2 and 3 would require additional land acquisition to allow for expansion and modernization activities while the port remains operational. Alternative 2 would include the expansion area required for Alternative 1 plus additional land west of the RHC LPOE. Alternative 3 would include the expansion area required for Alternative 1 plus additional land east of the RHC LPOE.

### D.3 DESCRIPTION OF FLOODPLAIN

The RHC LPOE site is relatively flat and located on an alluvial plain. The existing port and much of the City of Douglas sits on the low point of a regional drainage field and almost completely within areas designated as 100- or 500-year floodplains. An existing regulatory floodway, handled by a box culvert and designated as a 100-year floodplain lies directly to the west of the existing port along Pan American Avenue. As illustrated in Figure 2, portions of the expansion areas are included in the 100- and 500-year floodplains. Table 1 lists the acreages of the project areas within the 100- and 500-year floodplains.

**Table 1. Impacted Floodplain Acreages**

Floodplain	Existing RHC LPOE <sup>1</sup> (acres)	Alternative 1 Expansion Area (acres)	Alternative 2 Expansion Area (acres)	Alternative 3 Expansion Area (acres)
100-year	0.07	0.00	0.63	0.46
500-year	4.98	2.04	1.10	3.91

1. Inclusive of a separate parking lot area.

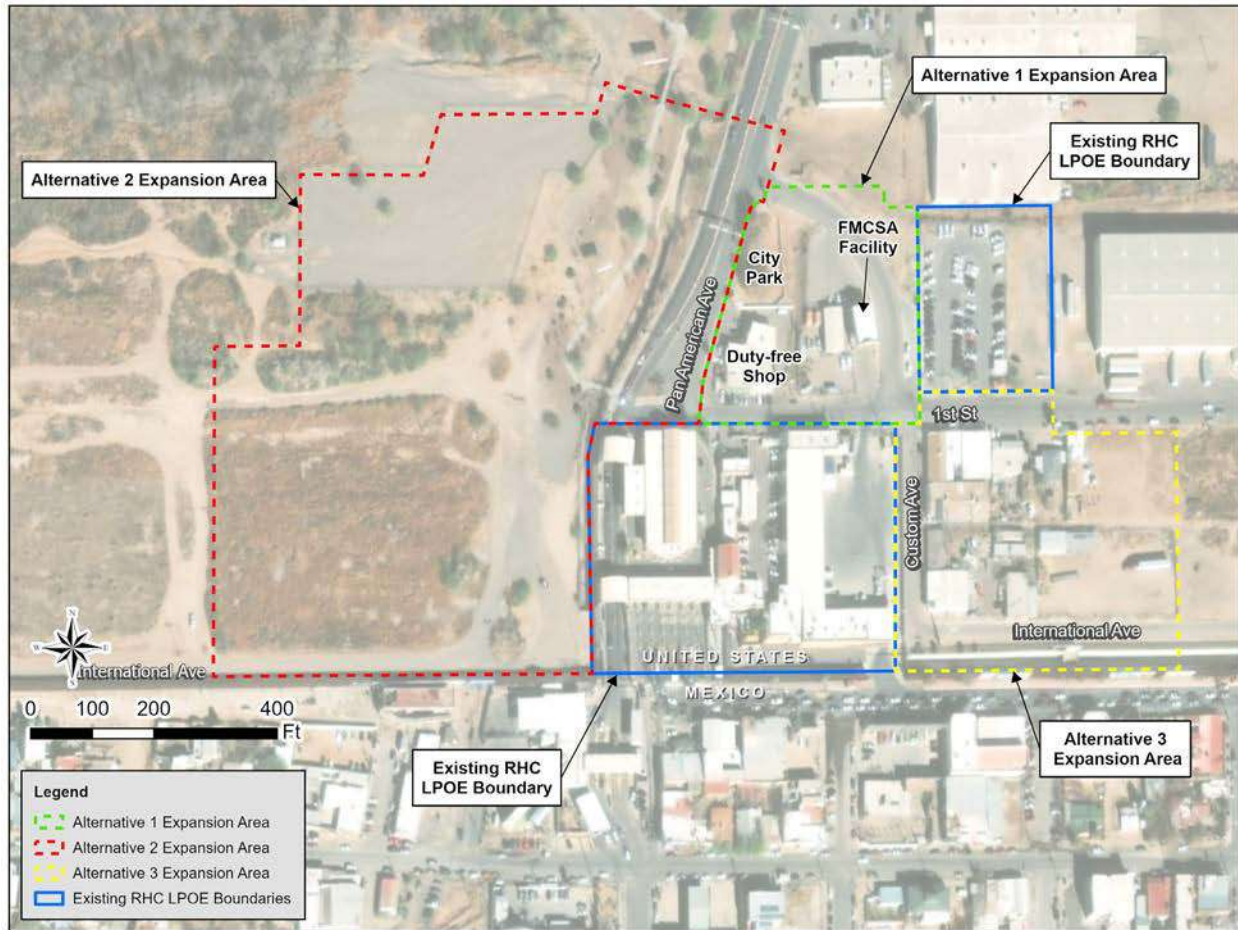


Figure 1. Alternative Expansion Areas at the RHC LPOE

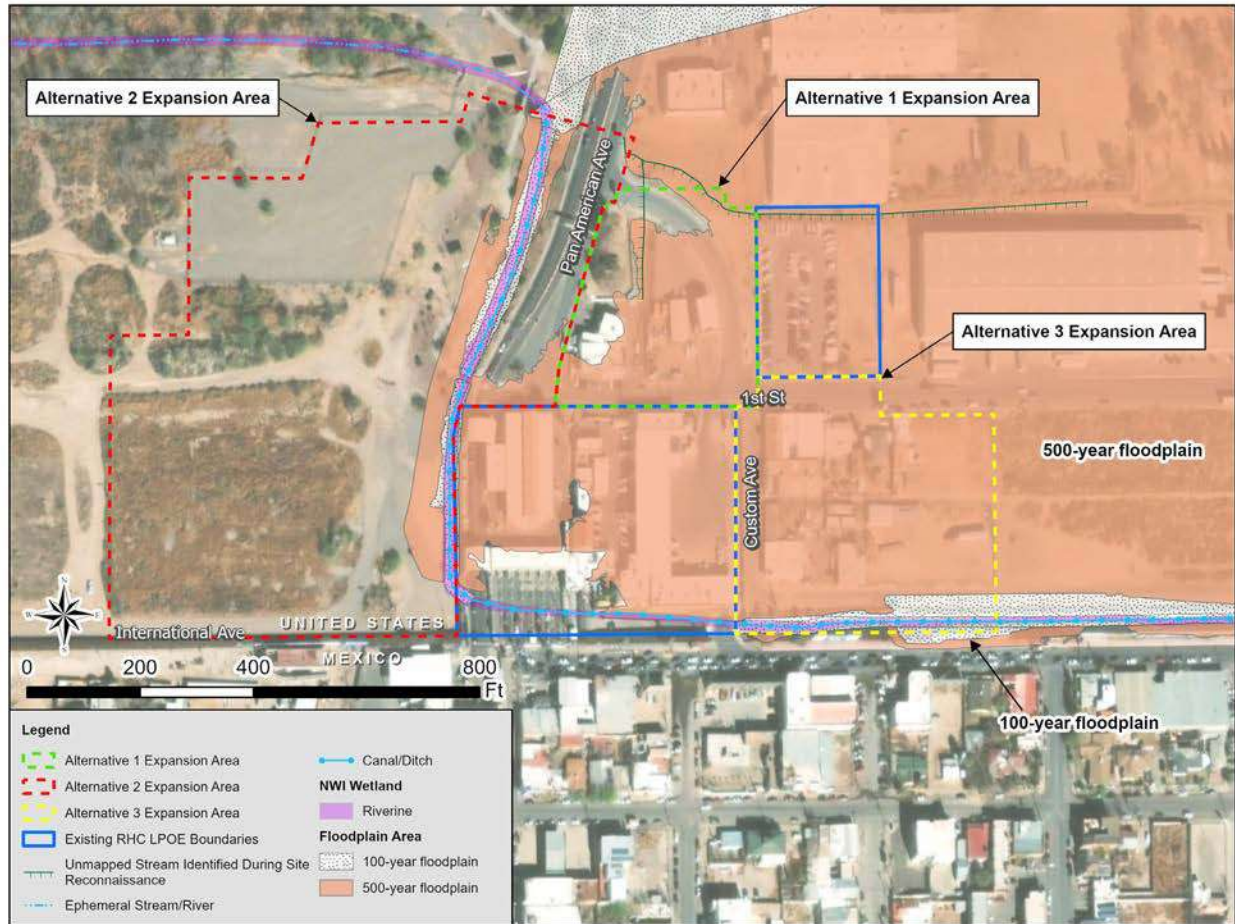


Figure 2. Floodplains Within the Alternative Expansion Areas at the RHC LPOE



## **D.4 FLOODPLAIN IMPACTS**

### **Alternative 1 – Sequential Construction**

Under Alternative 1, long-term, minor, adverse, direct and indirect impacts could result from construction within a designated 100- or 500-year floodplain. Construction for Alternative 1 would occur on approximately 8.8 acres, including 6.1 acres of existing RHC LPOE property and 2.7 acres in the Alternative 1 Expansion Area. Existing and proposed facilities at the RHC LPOE would be located within the 100- and 500-year floodplain; approximately 0.07 acres in the 100-year floodplain and 7.02 acres in the 500-year floodplain. However, of this acreage, only 2.04 acres of 500-year floodplain would represent areas not currently occupied by RHC LPOE facilities. Most of the existing port property and expansion area has been graded, paved, and built on with existing structures. Approximately 0.4 acre in the Alternative 1 Expansion Area is undeveloped land including a small city park. The short- and long-term additions of new structures or impervious surfaces in these areas could reduce the floodplain's capacity to store water, depending on final design and configuration of the RHC LPOE, or may result in the potential to expand the floodplain, thus increasing the spread or intensity of a flood event.

Final design of the RHC LPOE would incorporate standard measures, including those specified in P100 Standards, to reduce or manage stormwater flows and thus impacts to the floodplain and from flooding on the facility's buildings. This would include reviewing plans for the structure to comply with Federal Emergency Management Agency National Flood Insurance Program's Building Standards requirements for nonresidential structures, which require elevating the lowest floor to or above the base flood level. In accordance with EO 11988, GSA would follow the eight-step decision-making process for floodplain management outlined in GSA's *PBS Floodplain Management* policy. GSA would obtain any necessary development permits through the Arizona Stormwater Construction General Permit regarding construction within a 100-year floodplain.

### **Alternative 2 – Concurrent Construction (Westward Expansion)**

Under Alternative 2, the new facility footprint would expand to adjacent property west of Pan American Avenue on 13.9 acres of undeveloped land. Approximately 0.7 acre of 100-year floodplain occurs within the project area and follows the regulatory floodway flowing west of Pan American Avenue and across the southern portion of the RHC LPOE site. This total includes approximately 0.07 acre within the existing RHC LPOE property and approximately 0.63 acre within the Alternative 2 Expansion Area. An additional 8.12 acres of 500-year floodplain are located within the project area for Alternative 2, although only 1.1 acres of 500-year floodplain are in areas not included in the existing RHC LPOE property or Alternative 1 Expansion Area.

Construction for Alternative 2 could result in an increase of up to 13.9 acres of ground disturbance in the Alternative 2 Expansion Area in addition to the disturbance for Alternative 1. Similar to Alternative 1, the addition of any impervious surfaces and land use change could cause changes to the existing floodplains and exacerbate flooding issues. Stormwater measures and standard measures to reduce or minimize the impacts to the floodplain and from flooding would be implemented, similar to Alternative 1. Impacts would be long-term, minor, adverse, direct and indirect.

GSA may, instead, acquire temporary easements from the city for construction laydown areas for staging of heavy construction equipment. The use of temporary easements could result in fewer impacts to surrounding waterways within the and RHC LPOE if the temporary easements are located away from existing surface water features. Any newly disturbed areas used for construction laydown would be returned to existing conditions post construction activities. Final plans for land acquisition and any use of temporary easements would be determined during the design process for the RHC LPOE.

### **Alternative 3 – Concurrent Construction (Eastward Expansion)**

Under Alternative 3, the new facility footprint would expand to adjacent property east of the existing port on 4.4 acres of land that has been mainly graded, paved, and built on with existing structures. The alternative would affect a total of approximately 0.53 acres of 100-year floodplain, including 0.07 acre at the existing RHC LPOE and 0.46 acre along the southern boundary of the Alternative 3 Expansion Area. The alternative would also affect approximately 10.93 acres of 500-year floodplain, including 7.02 acres at the existing port property and Alternative 1 Expansion Area plus 3.91 acres in the Alternative 3 Expansion Area.

Construction for Alternative 3 would include demolition of structures and ground disturbance on approximately 4.4 acres in the Alternative 3 Expansion Area in addition to the disturbance for Alternative 1. Of the entire 4.4-acre area, only approximately 1.8 acres are open land; however, more than half of that area has been cleared, graded, and compacted for use as a graveled parking lot. Thus, less than an acre of the entire Alternative 3 Expansion Area has land that contains vegetation and is not impervious. Conservatively, it is assumed that up to 1.4 additional acres of impervious surfaces could be added under Alternative 3 to include impervious surfaces added in the Alternative 1 Expansion Area. Similar to Alternative 1, the addition of any impervious surfaces and land use change could cause changes to the existing floodplains and exacerbate flooding issues. Stormwater measures and standard measures to reduce or minimize impacts to the floodplain and from flooding would be implemented, similar to Alternative 1. Impacts would be long-term, minor, adverse, direct and indirect.

## **D.5 ALTERNATIVES**

As illustrated in Figure 2, the majority of the existing RHC LPOE has been operating within a 500-year floodplain. The existing RHC LPOE must remain operational in order to allow CBP to continue to meet its mission to screen all foreign visitors, returning American citizens, and imported cargo. The existing footprint of the RHC LPOE must expand to allow for GSA to meet the following project needs:

- 1) improve the capacity and functionality of the LPOE to meet future demand, while maintaining the capability to meet border security initiatives;
- 2) ensuring the safety and security for the employees and users of the RHC LPOE; and
- 3) improving traffic congestion and safety for the City of Douglas.

After evaluating project design options and considering economic and market factors, GSA concluded that the expansion areas must be contiguous with the existing RHC LPOE to provide for a cohesive, efficient final site plan. As the existing RHC LPOE is surrounded by the 500-year floodplain on all sides, there is no practicable alternative to expanding the existing RHC LPOE other than locating within the 500-year floodplain.

## **D.6 NOTICE OF FLOODPLAIN ACTION AND COMMENT PERIOD**

In accordance with 10 CFR Part 9.6, GSA is providing this floodplain assessment to appropriate government agencies and other interested parties for review and comments. GSA published a Notice of Availability in the *Herald Review* regarding the availability of the Draft EIS and Floodplains Assessment. The Draft EIS is available electronically on the GSA website at: <https://www.gsa.gov/about-us/regions/welcome-to-the-pacific-rim-region-9/land-ports-of-entry/raul-hector-castro-land-port-of-entry>. Comments received during the 45-day comment period will be considered in preparation of the Final EIS and this floodplain assessment.

## **D.7 CONCLUSIONS AND STATEMENT OF FINDINGS**

It is anticipated that this project would not result in significant adverse impacts to the 100- and 500-year floodplains. Temporary disturbance within the floodplains would cease following completion of

construction activities associated with the Proposed Action. Proper erosion and sediment control measures would be utilized during construction. Final design of the RHC LPOE would incorporate standards specified in the PBS P100 building design standards to minimize the potential impacts to floodplains identified. The Proposed Action would not significantly modify existing elevations and flow paths of the area within the floodplain from pre-project conditions to post-project conditions or result in other significant long-term adverse impacts to the floodplain. No effects to lives and property associated with floodplain disturbance are anticipated.

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**APPENDIX E – COMMENTS ON THE DRAFT EIS (JANUARY 2023)**

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## Environmental Impact Statement for the Expansion and Modernization of the Raul Hector Castro Land Port of Entry and Proposed Commercial Land Port of Entry Comments on the Draft EIS

ID: 1	Name: Julie McIntyre (for Heather Whitlaw, Field Supervisor)	Affiliation: U.S. Fish and Wildlife, Arizona Ecological Services Office	Date: February 8, 2023
	Comment	Response	
1-1	<p>This letter documents our review of the “Draft 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”, dated January 2023, developed by Potomac-Hudson Engineering, Inc. on behalf of the GSA in accordance with the National Environmental Policy Act of 1969 (NEPA, 42 U.S.C. §4321 et seq.). The project will comprise of (1) construction of a n90w port facility dedicated to commercially owned vehicles; and (2) expanding and modernizing the existing Raul Hector Castro Land Port of Entry facilities in Cochise County, Arizona, to serve as a non-commercial facility for privately owned vehicles and pedestrians. The new commercial facility would be constructed approximately five miles west of the current facility. The DEIS considers two action and one no-action alternatives: specifically, the concurrent or sequential construction of the new facility and upgrade of the current facility.</p> <p>We note that effects to biological resources are identified in Section 3-7; specifically, federally listed species in Table 3.7-1. You included two endangered species, the jaguar (<i>Panthera onca</i>) and the Yaqui chub (<i>Gila purpurea</i>), and four threatened species, the yellow-billed cuckoo (<i>Coccyzus americanus</i>), northern Mexican gartersnake (<i>Thamnophis eques megalops</i>), Chiricahua leopard frog (<i>Rana chiricahuensis</i>), and Yaqui catfish (<i>Ictalurus pricei</i>).</p>	<p>Thank you for your comment.</p>	
1-2	<p>We recommend continued coordination with the USFWS, as the project progresses. We also recommend you continue to coordinate your project with the Arizona Game and Fish Department, as other species of concern are managed at the state level.</p> <p>Noted below are areas where clarifications may be needed or where we can provide additional assistance:</p>	<p>The General Services Administration (GSA) appreciates your recommendations and will continue to coordinate with U.S. Fish and Wildlife Service (USFWS) and the AZ Game and Fish Department as the project proceeds. The AZ Game and Fish Department was sent a letter providing notification of the Draft Environmental Impact Statement (DEIS); however, no comment or response was received. GSA will send another letter to the AZ Game and Fish Department notifying them of the revised Draft EIS.</p>	

ID: 1	Name: Julie McIntyre (for Heather Whitlaw, Field Supervisor)	Affiliation: U.S. Fish and Wildlife, Arizona Ecological Services Office	Date: February 8, 2023
Comment		Response	
1-3	<p><u>Page 3.7-2, Section 3.7.1.3:</u> We raise the point that by moving development and traffic out of developed areas and into more remote locations, sites with less suitable or marginally suitable habitat for listed species in these remote areas become unsuitable and species become more displaced, especially species sensitive to disturbance.</p>	<p>GSA recognizes that the expansion of the Raul Hector Castro (RHC) (Land Port of Entry (LPOE) west of the existing property and the siting of the proposed Commercial LPOE to the remote area 5 miles west of Douglas would further contribute to habitat fragmentation, eliminate the less-suitable habitat for listed species found there, and potentially displace species sensitive to disturbance. The DEIS addressed these concerns in Section 3.7.2.4 for the Commercial LPOE location and in Section 3.7.2.5 for the RHC LPOE western expansion area for wildlife. The potential effects are described there as permanent, moderate, adverse direct impacts based on the determination that extensive acreages of more-suitable habitat occur in close proximity to these sites. Regarding effects to listed species, please refer to comment responses to 1-4 through 1-7.</p>	
1-4	<p><u>Page 3.7-5, Table 3.7-1:</u> In the list of federal species, some are described as possibly occurring in the ROI, but no discussion of effects to the species are identified as in Table 3.7.3 for species of special status</p>	<p>GSA added text to Section 3.7.2.3 and Table 3.7-3 in the Revised DEIS describing potential effects on listed species. Species with any potential to occur are discussed in Table 3.7-3. Species with no potential to occur are dismissed from further consideration.</p>	
1-5	<p><u>Page 3.7-5, Table 3.7-1:</u> In the first table entry, we bring to your attention the jaguar observation database that can be queried for assistance for determining likelihood of jaguar presence. The database can be found at: <a href="https://jaguardata.info/">https://jaguardata.info/</a>.</p>	<p>The analysis for the Revised DEIS has been updated to include a review of the Jaguar Observation Database. A review of the Jaguar Observation Database identified no observations of jaguars within 20 miles of the project areas. The nearest sightings have been in the Chiricahua Mountains to the north.</p>	
1-6	<p><u>Page 3.7-5, Table 3.7-1:</u> In the first table entry, we also bring to your attention that some areas of the border fence are not impermeable to traveling jaguars, as portions of the fence remain unfinished and during certain periods of the year flood gates remain open. Thus, the fence can act as a funnel for dispersing and traveling jaguars and increased traffic where little have been before (in the case of the new COV) could affect jaguars moving across the landscape</p>	<p>GSA acknowledges that the border fence may not be impermeable to jaguars in unfinished areas and that completed fencing may funnel the movement of jaguars and their travel across the landscape. However, the border fence is known to be complete and in-tact in the area surrounding the Commercial LPOE for many miles both to the east and west (currently, the pedestrian border fencing stretches approximately 26 miles east and 24 miles west of the existing RHC LPOE). Floodgates are positioned where washes and creeks cross the international border; the nearest floodgate is approximately half a mile west of the existing RHC LPOE. However, it is unlikely for jaguars to utilize habitats near the project sites due to the amount of human activity and associated development. Further, as described above, there have been no recorded observations of jaguars within 20 miles of the project site.</p>	
1-7	<p><u>3.7-8, Section 3.7.2.3:</u> You state that the biologist reconnaissance of the project area did not identify any potential habitat for any of the six federally protected species listed in Table 3.7.1; however, this does not address travel, dispersal, or migration habitat.</p> <p>If you require further assistance or you have any questions, please contact Cassondra Walker (<a href="mailto:cassondra_walker@fws.gov">cassondra_walker@fws.gov</a>) or Julie McIntyre</p>	<p>The biological reconnaissance did consider the potential for travel, dispersal, or migration habitat. Section 3.7.1.3 and Section 3.7.2.3 have been revised to clarify this, and state that the potential for species to occur as listed in Table 3.7-1 considers the findings of the biological reconnaissance.</p>	



	(julie_mcintyre@fws.gov). Please refer to consultation number 2023-0017098 in any future correspondence. Thank you for your continued efforts to conserve endangered species.		
<b>ID: 2</b>	<b>Name:</b> Mark Salcido	<b>Affiliation:</b> Private Citizen	<b>Date:</b> February 9, 2023
	<b>Comment</b>	<b>Response</b>	
2-1	<p>My name is Marco Salcido. My wife, Melissa Salcido, and I have property located at 201 1st St. Douglas AZ, 85607. Since we are getting closer to the new Port of Entry remodel, I wanted to reach out to see if GSA was interested in leasing our property, we would of course build to suit your needs. I believe we are in the perfect location for the construction of the Port because we are within walking distance. I believe it would benefit Government Employees, Safety Personal, and Contractors.</p> <p>I have been tracking all GSA notes and drafts as they have come out and I have a few suggestions/ideas I would like to share. I believe alternative 2 would be ideal since the City of Douglas has some big warehouses near the Port of Entry.</p> <p>Warehouse 1. Parcel # 40910013, Warehouse 2. Parcel # 40910012 Warehouse 3. Parcel # 40909015B, Warehouse 4. Parcel # 40909014 Warehouse 5. Parcel # 40910022A, Warehouse 6. Parcel # 40906002 Warehouse 7. Parcel # 40906005J, Warehouse 8. Parcel # 40906001</p>	<p>Thank you for your interest. Leasing these parcels is not currently a part of GSA's Proposed Action. GSA would utilize the project areas as shown for each alternative in Figure 2-1 of the DEIS, including for project staging.</p>	
2-2	<p>Alternative 1 Depends on the plan for our local warehouses. Will they move or will we still have the commercial traffic coming through town? Will the truckers be checking into the new port at James Ranch Rd? If so, I think Alternative 2 would be more ideal if we had a local route for our local warehouses and deliveries from out of state. I would think Pan American Ave would be ideal for all commercial traffic in and out of town since all warehouses are right off Pan American Ave. I have a drawing if you are interested in looking at it.</p>	<p>GSA's Alternative 1 in the DEIS is defined in Section 2.1 and includes sequential construction of the following two actions:</p> <ol style="list-style-type: none"> <li>1) Construction of a new dedicated Commercial LPOE to process only commercially owned vehicles (COVs), located approximately 5 miles west of the RHC LPOE; and</li> <li>2) Expansion and Modernization of the Existing RHC LPOE to a Non-Commercial LPOE, which would be processing only privately owned vehicles (POVs) and pedestrians.</li> </ol> <p>Future development plans for current or future warehouses are not a part of GSA's Proposed Action or within the control or authority of GSA to dictate. It is expected that with development of the new Commercial LPOE, some warehouses may choose to relocate outside of downtown Douglas, as discussed in Section 3.10, Socioeconomics of the EIS. This is also consistent with the long-term development plans for the City to relocate commercial traffic outside of downtown Douglas.</p>	

ID: 2	Name: Mark Salcido	Affiliation: Private Citizen	Date: February 9, 2023
Comment		Response	
2-2		<p>Under all alternatives, commercial traffic would be redirected to the new Commercial LPOE and would not be able to pass through the existing RHC LPOE. However, GSA does not have the authority to establish specific commercial traffic routes on surrounding roadways or restrict traffic from any roadways. At this time, there are no known plans to permanently restrict commercial traffic on any local roadways, including in downtown Douglas. Designation of truck restrictions on surrounding roadways is the responsibility of Arizona Department of Transportation (ADOT) or the City of Douglas, depending on the roadway.</p> <p>Please note that a new Commercial LPOE would be constructed under Alternatives 1, 2, or 3; the only differences between the alternatives are generally the timing of construction and the land area the newly expanded RHC LPOE would encompass.</p>	
2-3	<p>Alternative 2 would be on the other side of Port (East). Commercial traffic would use G Ave heading down 3rd or 2nd street to Pan American Ave and POV traffic would go through Pan American and straight as usual. This way commercial vehicles have a way to warehouses and straight to 3rd St to Chino Rd. But if warehouses are moving then alternative 1 would be the better option. Either way I'm happy Douglas is getting a transformation and work for residents and businesses.</p> <p>My Parcel # 40909002.</p> <p>Thank you for any information you can give.</p>	<p>GSA's Alternative 2 in the EIS is defined in Section 2.2 and includes concurrent construction of the following two actions:</p> <ol style="list-style-type: none"> <li>1) Construction of a new dedicated Commercial LPOE to process only COVs, located approximately 5 miles west of the RHC LPOE; and</li> <li>2) Expansion and Modernization of the Existing RHC LPOE to a Non-Commercial LPOE, which would be processing only POVs and pedestrians. Expansion would be to the <u>west</u> of the RHC LPOE, not east.</li> </ol> <p>As discussed in the response to comment 2-2, GSA does not have control or authority regarding planned future actions for warehouses or any travel restrictions on local roadways.</p>	
ID: 3	Name: Jason Oxios	Affiliation: Private Citizen	Date: February 22, 2023
Comment		Response	
3-1	<p>I was researching your Port of Entry project and was wondering how many pedestrians and vehicles cross daily. Is there a link or information you can send?</p>	<p>GSA provided the requested data to the commenter on February 27, 2023, which can be found at the website:  <a href="https://explore.dot.gov/views/BorderCrossingData/Annual?%3Aembed=y&amp;%3AisGuestRedirectFromVizportal=y">https://explore.dot.gov/views/BorderCrossingData/Annual?%3Aembed=y&amp;%3AisGuestRedirectFromVizportal=y</a></p>	

ID: 4	Name: Susan Kramer	Affiliation: Private Citizen	Date: February 22, 2023
Comment		Response	
4-1	<p>My concerns-</p> <ol style="list-style-type: none"> <li>1) You are building “stuff” within 100ft to 500ft of a flood plain. There doesn’t seem to be a “concrete” plan for how that will work safely.</li> <li>2) What will happen with the “slag hill” and the poisonous materials in/on it?</li> <li>3) I wish you had actually made a presentation for this meeting. Having someone verbally go over the information would be useful- maybe you should change your presentation model.</li> <li>4) The meeting was promoted as “Draft of Environmental Impact Statement.” Went around reading 6 boards before I got to the charts on environmental impact.</li> </ol>	<ol style="list-style-type: none"> <li>1) The existing RHC LPOE adjoins the regulatory floodway for the 100-year floodplain as discussed in Section 3.6.1.3 of the DEIS and illustrated in Figure 3.6-3. The floodway extends north just to the west of Pan American Avenue and borders the west side of the Alternative 1 Expansion Area and the east side of the Alternative 2 Expansion Area. Section 3.6.2.3 in the DEIS describes the potential impacts from construction in the 100-year floodplain for Alternative 1 as long-term, minor, and adverse. In Section 3.6.2.4, the DEIS describes the impacts on the floodplain for Alternative 2 as long-term, minor, and adverse as well. The sections state that final design of the RHC LPOE would incorporate standard measures, including those specified in GSA’s P100 Standards, to reduce or manage stormwater flows and thus impacts to the floodplain and from flooding on the facility’s buildings.</li> <li>2) GSA has no jurisdiction over the slag piles, which are not within any Proposed Action alternative sites. GSA conducted soil testing within its project area to investigate potential concerns of metals contamination from the former Phelps-Dodge smelter site (PD smelter site) and did not identify any contamination concerns directly attributed to the site, as summarized in Section 3.13 of the revised DEIS. Please refer to the response to comment 11-1 for more information.</li> <li>3) GSA appreciates your comment and recommendation. GSA staff were available during the meeting to answer any questions the public had, to include walking the public through the displays.</li> <li>4) Thank you for your comment. The graphic illustrations presented at the meeting were intended to provide information about the Proposed Action and Alternatives as a basis for the environmental impact evaluations. The final two displays provided a summary of impacts from the action on the various resources considered. GSA staff were available during the meeting to provide clarification on the posters, to include the impact analysis.</li> </ol>	
ID: 5	Name: Gabriel Rivera	Affiliation: Private Citizen	Date: February 22, 2023
Comment		Response	
5-1	<p>Hello my name is Gabriel Rivera. I’m a Realtor in Douglas Az. I would like to be added to the GSA List. Thank you.</p>	<p>Thank you for your interest. GSA has added you to the notification list.</p>	

ID: 6	Name: Alberto Reyes	Affiliation: Private Citizen	Date: February 22, 2023
Comment		Response	
6-1	<p>"What's going to happen in the intersection between the highway and James Ranch Rd?" How are you going to improve it without slowing down the traffic?</p>	<p>James Ranch Road would be improved, including at the intersection with SR-80, under a separate project to be completed by ADOT. Please refer to Section 2.1.1 of the DEIS and Section 4.2.1 in the Cumulative Impacts chapter. Improvements and management of that intersection are outside of GSA's control or authority.</p> <p>Section 3.8.2.3 of the DEIS discusses projected traffic changes and effects for Alternative 1 under scenarios of anticipated growth and worst-case conditions during the operation of the proposed Commercial LPOE in 2028 and 2033. The results indicated that the level of service (LOS) would remain at an "A" rating (free flow) on SR-80, James Ranch Road, and US-191 in all cases. The conditions would be essentially the same for Alternative 2 and newly added Alternative 3.</p>	
ID: 7	Name: Michael S. Dixon, Acting Field Manager	Affiliation: Bureau of Land Management, Tucson Field Office	Date: February 27, 2023
Comment		Response	
7-1	<p>The Bureau of Land Management (BLM) Tucson Field Office has reviewed the "Draft 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," dated January 2023, EIS 20230012 and the BLM provides the following comments.</p> <ul style="list-style-type: none"> <li>- The proposed new Commercial Land Port of Entry lies within the area managed by the BLM Tucson Field Office.</li> <li>-On page 2-5, Figure 2-3 depicts roadways crossing into the United States of America from Mexico to the proposed new commercial port of entry across land belonging to the United States of America and managed by the United States Bureau of Land Management in T. 24 S., R. 26 E., sec. 24. This land lies south of the proposed new commercial port of entry. <ul style="list-style-type: none"> <li>o A right-of-way grant from the BLM will be needed for use of lands in section 24.</li> <li>o Addition of language in Section 2.1.1, in the discussion of roadways on page 2-4, mentioning access across lands managed by the BLM is requested.</li> </ul> </li> </ul>	<p>Under the Proposed Action, GSA would request a right-of-way (ROW) grant from Bureau of Land Management (BLM) for construction and use of a roadway from the Commercial LPOE to the U.S. - Mexico border. Text has been added to Section 2.1.1 in the Revised DEIS stating this requirement.</p>	

ID: 7	Name: Michael S. Dixon, Acting Field Manager	Affiliation: Bureau of Land Management, Tucson Field Office	Date: February 27, 2023
Comment		Response	
7-2	<p>Also, regarding Figure 2-3, the alignment of the road to the north of the new commercial port of entry on does not align with James Ranch Road which is actually on the east side of the area shown with secure fencing. Verification of the location of the road and conceptual site layout is suggested.</p> <p>The BLM looks forward to working with the General Services Administration on processing a right-of-way grant application for the land between the new proposed commercial port of entry and the United States-Mexico boundary.</p> <p>If you have any questions, feel free to contact me at (520) 258-7200 or Realty Specialist Bill Werner at (520) 258-7228 or email <a href="mailto:wwerner@blm.gov">wwerner@blm.gov</a>.</p>	<p>Section 2.1.1 explains that Figure 2-3 is a conceptual site layout for discussion and analytical purposes, and that the exact layout would be determined by the construction contractor within the parameters analyzed in the EIS. Figure 2-3 has been updated with a new, 50 percent design site plan that shows the location of James Ranch Road on the east side of the LPOE. Text has been added to Section 2.1.1 indicating the updated figure and stating that GSA does not specifically propose to change the alignment of James Ranch Road, nor is it GSA's understanding that ADOT intends to realign the road. As stated in Section 2.1.1, development of James Ranch Road is a separate project being led by ADOT to support the Commercial LPOE and other development in the area. Questions regarding the James Ranch Road project should be directed to Mark Sanders at ADOT (<a href="mailto:msanders3@azdot.gov">msanders3@azdot.gov</a>).</p> <p>Refer to the response to comment 7-1 regarding the ROW grant application for the land between the proposed Commercial LPOE and the United States-Mexico boundary.</p>	
ID: 8	Name: Heidi Dove	Affiliation: Private Citizen	Date: March 1, 2023
Comment		Response	
8-1	<p>I'm currently looking at leasing office space at 205 1st St for my company. Would you be able to tell me how the renovations would effect the building? For example, how would noise of the construction effect my ability to conduct meeting both virtual and in person? Would I need to worry about computer equipment falling off my desk due to the vibrations of the construction? I also have a toddler that I may need to bring into the office from time to time. Would the area be safe for my little one?</p>	<p>The parcel including the address in question is included within the Alternative 3 Expansion Area in the Revised DEIS. If selected by GSA as the preferred alternative, GSA would intend to acquire the entire parcel.</p> <p>Otherwise, if GSA were to select Alternative 1 or 2 as the preferred alternative, the impacts on the address in question would be as described in the Revised DEIS for various factors, including air quality, noise, traffic, human health and safety, among others.</p> <p>Specifically, Section 3.9.2.3 discusses noise impacts during construction at the LPOE. Estimated noise levels at properties on 1<sup>st</sup> Street during construction are estimated to be approximately 86 to 88 A-weighted decibel (dBA); however, standard buildings with windows and doors shut would further reduce noise levels by approximately 15 dBA. Therefore, the estimated noise level from the combined construction equipment within 50 feet would reduce to 75 dBA and could result in 71 to 73 dBA indoors. It is likely that the estimated noise levels would decrease further to safer indoor noise levels (i.e., 70 dBA or less) as most of the construction activities would not occur simultaneously and would be located away from the project boundary. Additionally, construction noise levels are expected to occur at less than 75 dBA over 8 hours, the threshold at which hearing loss could occur.</p>	

ID: 8	Name: Heidi Dove	Affiliation: Private Citizen	Date: March 1, 2023
	<b>Comment</b>	<b>Response</b>	
		<p>At 60 feet (location of closest receptor to project boundary), it is expected that most, if not all, construction activities would result in vibrations at a peak particle velocity of less than 0.1 or 0.2 inches per second, the threshold at which vibrations become a disturbance. Refer to Section 3.9 for further details on vibration impacts on receptors. Additionally, GSA would notify adjacent landowners prior initiating the loudest construction activities. Text has been added to Section 3.9 of the revised Draft EIS regarding notifications.</p> <p>Section 3.12.2.3 of the DEIS discusses impacts to children's safety. While there could be adverse impacts to children from construction noise and air emissions, impacts to children would be lessened if the children are indoors, similar to as described above for noise impacts. Please note the construction site would be fenced and standard safety measures would be employed to prohibit access to the site.</p> <p>Please also note the construction timeline of 36 to 42 months at the RHC LPOE, and the construction start date, depending on the alternative selected, is either 2025 or 2028.</p>	
ID: 9	Name: Judy James	Affiliation: Private Citizen	Date: March 9, 2023
	<b>Comment</b>	<b>Response</b>	
9-1	<p>I would like to express that I am in favor of the Alternative Plan 1, (sequential construction) for the Douglas, Arizona, commercial LPOE. This plan would be safer as construction would not be impeded by vehicles and pedestrians, alike. Once the new commercial port is open the construction or reconstruction of the Paul Castro Land LPOE would then only have to contend with the pedestrian and smaller vehicles.</p> <p>By diverting the hazardous shipments and heavier traffic to the new commercial port both Douglas and Agua Prieta, Sonora, would safer.</p>	Thank you for your comment.	

<b>ID: 10</b>	<b>Name:</b> Jean Prijatel, Manager, Environmental Review Branch	<b>Affiliation:</b> United States Environmental Protection Agency, Region IX	<b>Date:</b> March 13, 2023
<b>Comment</b>		<b>Response</b>	
10-1	<p>The U.S. Environmental Protection Agency has reviewed the General Service Administration’s Draft Environmental Impact Statement for the Expansion and Modernization of Raul Hector Castro Land Port of Entry project. Our comments are provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. The CAA Section 309 role is unique to EPA. It requires EPA to review and comment publicly on any proposed federal action subject to NEPA’s environmental impact statement requirement.</p> <p>The General Services Administration proposes to expand and modernize the Raul Hector Castro Land Port of Entry in Douglas, Arizona, including a new border crossing roughly 5 miles west of the existing crossing dedicated to Commercially-Owned Vehicles, to address traffic safety and hazard concerns resulting from space constraints and increased traffic volumes crossing the border. The prepared Draft EIS analyzes a no action alternative and two action alternatives, either sequential or concurrent construction of the proposed border facilities. Through our scoping letter provided to GSA on August 15, 2022 the EPA recommended addressing potential impacts to air, aquatic, biological, climate, historical, cultural, and green building resources, environmental justice concerns, and bi-national coordination suggestions. We appreciate GSA adopting EPA’s scoping recommendations, and the commitment to construction phase air impact mitigation measures and P100 green building standards. We also appreciate the continued coordination with Arizona Department of Transportation and consideration of bi-national concerns and historic property conservation.</p> <p>The EPA did not identify significant environmental concerns to be addressed in the Draft EIS, and is providing recommendations regarding engaging with the public and reducing impacts.</p>	Thank you for your comment and recommendations.	

ID: 10	Name: Jean Prijatel, Manager, Environmental Review Branch	Affiliation: United States Environmental Protection Agency, Region IX	Date: March 13, 2023
Comment		Response	
10-2	To further encourage public engagement, the EPA recommends that GSA continue to announce public meetings through the City of Douglas's community calendar given the absence of a local newspaper.	GSA appreciates your comment and recommendation. GSA previously requested that the City place an announcement on the City calendar; the City made posts in multiple areas of its website and on social media platforms as described in the response to Comment 12-31. Ultimately the City calendar is controlled by the City of Douglas and not GSA; therefore, GSA does not have control over what is posted on the calendar. Please refer to the response to comment 12-31 regarding other public outreach efforts conducted as part of the project. GSA will continue to request the City consider placing future meeting announcements on the City calendar.	
10-3	EPA further recommends GSA disclose in the Final EIS known scheduling information regarding road-building commitments on the Mexican side of the border that can inform GSA's preferred alternative for the proposed project. Harmonizing construction timing can minimize impacts to the border-crossing public.	GSA appreciates your comment and recommendation. The U.S. Government has received a diplomatic note from the Mexican government committing to construction of the Mexican-side commercial port but has not received technical coordination or scheduling information to date. GSA anticipates construction on the Mexican side will be complete on or around the time of the proposed Commercial LPOE in Douglas, particularly due to the fact that construction timelines in Mexico generally are comparably shorter than in the U.S.	
10-4	Finally, as the project design is finalized, the EPA encourages continuing to identify and commit to all measures to reduce operational emissions	GSA appreciates your comment and recommendation. GSA will commit to measures to reduce emissions in the Record of Decision (ROD). At this time, GSA is committed to constructing new facilities to be Leadership in Energy and Environmental Design (LEED) Gold at a minimum and "net zero" ready, so to accommodate potential future use of renewable energy sources. The new facilities would also comply with the Energy Independence and Security Act (EISA) of 2007. Between EISA 2007 and LEED, the project would adhere to whichever requirements are higher. Furthermore, the project would also adhere to the Council on Environmental Quality's (CEQ) <i>Guiding Principles for Sustainable Federal Buildings</i> . The design team would utilize GSA's Guiding Principles Checklist to track and report compliance. These measures would all serve to reduce operational emissions.	
	The EPA appreciates the opportunity to review this Draft EIS. When the Final EIS is released for public review, please notify us and make an electronic version available. If you have any questions, please contact Zac Appleton, the lead reviewer for this project, at 415-972-3321 or <a href="mailto:appleton.zac@epa.gov">appleton.zac@epa.gov</a> .	Thank you for your comment and recommendations.	



ID: 11	Name: Steven Helffrich	Affiliation: Private Citizen	Date: March 13, 2023
Comment		Response	
11-1	<p>Per your instructions at the second City of Douglas EIS Public Scoping Meeting, I am submitting the following questions to be addressed in EIS Douglas Port of Entry Project:</p> <p><u>Prior Scope Request Questions (unanswered or insufficiently answered, 19.Aug. 2022)</u></p> <p>1. Due to the proximity (PBS NEPA Desk Guide Oct 1999 Sec. 3.5.1.3 Toxic and Hazardous Materials) of the proposed New Commercial Port (2.5 mi.) and proximity of the existing POE also slated for renovations (+ 372 ft.) to the Phelps Dodge Smelter Site, and the change in the Land Use/Development Patterns which will occur because of the Commercial Port's proposed location, a TENORM Study of all the parcels associated with the Smelter should be included in the Environmental Impact Study (EIS). Based on the findings of the study, appropriate actions should be taken (Remediation/Encapsulation/Removal/Reclamation) in order to return the site to pre-smelter condition (Whitewater Draw riparian wetlands).</p> <p>Will the GSA agree to facilitate the development of the test with the USEPA, ADEQ and Freeport-McMoRan?</p>	<p>The former PD smelter site is located approximately 0.7 and 3.5 miles from the RHC LPOE and proposed Commercial LPOE, respectively. This is based on extensive review of historical documentation of the former location of the PD smelter site, as was summarized in Section 3.13 of the original DEIS. As stated in the Appendix A Scoping Report of the original DEIS regarding the referenced scoping comment, GSA conducted a detailed analysis of existing site conditions within the region of influence for potential sources of contamination using existing and available data including the U.S. Environmental Protection Agency (USEPA) Superfund Site online database and the Arizona Department of Environmental Quality (ADEQ) Voluntary Remediation Program (VRP) online database. As discussed in Section 3.13.1.3 of the original DEIS, GSA did not identify any radiation concerns from the former PD smelter site to warrant further investigation within the proposed LPOE project areas. The Proposed Action would not disturb or alter the former PD smelter site in any way. Potential impacts from historical operation of the former PD smelter site on local water resources or soils are discussed in Sections 3.6 and 3.13 of the original DEIS and have been updated in the revised DEIS. Refer to the response to Comment 11-4 for additional information on background research regarding radionuclide concerns. Refer to the response to Comment 11-3 regarding soil sampling conducted by GSA since the issuance of the original DEIS to investigate potential contamination from the PD smelter site.</p> <p>GSA's obligation under the National Environmental Policy Act (NEPA) is to consider "reasonably foreseeable" impacts from its Proposed Action. GSA has no reason to believe that the Proposed Action would affect the areas occupied by the former PD smelter site or present-day slag pits, based on current project plans. Further, based on a review of previous sampling efforts by USEPA, GSA has no reason to believe there are concerns related to radionuclides attributed to the former PD smelter site near the project area (refer to the response to comment 11-4). GSA also conducted soil sampling of the project areas to investigate past contamination associated with the former PD smelter site and did not identify any contamination concerns directly attributable to the site, as discussed in newly added text to Section 3.13.</p> <p>While long term changes in land use/development patterns could occur in the greater Douglas area in the future, both in downtown Douglas and near the Commercial LPOE, these changes are part of larger development strategies and planning goals of the City, of which the development of a new Commercial LPOE is only one aspect. GSA acknowledges that development</p>	

ID: 11	Name: Steven Helffrich	Affiliation: Private Citizen	Date: March 13, 2023
	<p><b>Comment</b></p>	<p><b>Response</b></p> <p>of the Commercial LPOE is a key component to future development in this area, and future development could result in indirect effects in areas outside of GSA's project area, as discussed in Sections 3.4 and 3.11 of the DEIS, as well as in Chapter 4, Cumulative Impacts. However, specific future development planning is in the early stages, and future development decisions are not within GSA's control or authority. The extent of information regarding any planned future development that is available and is known to GSA has been incorporated into the DEIS.</p> <p>As ruled in <i>Dubois v U.S. Dept. of Agriculture</i>, 102 F.3d 1273, 1286 (1st Cir 1996), when attempting to define indirect effects, an "agency need not speculate about all conceivable impacts but it must evaluate the reasonably foreseeable effects of the proposed action." Given the lack of identified radiation concerns from the former PD smelter site demonstrated in past investigations, the lack of other contamination concerns attributed to the former PD smelter site based on GSA's and other agency's sampling activities within and near the project area, and the extent of available plans or information pertaining to any potential future development, GSA has determined that it has taken a "hard look" at potential impacts from historical contamination associated with the former PD smelter site and ongoing presence of the slag pits on the project area, including for radiation concerns, as it pertains to its Proposed Action. Extensive, detailed study of parcels outside of GSA's project area is not within the intent of NEPA to consider reasonably foreseeable impacts and is outside the scope of this EIS.</p> <p>Further, as GSA has no jurisdiction over the former PD smelter site, it has no authority or responsibility to dictate clean-up of this site. Concerns regarding site clean-up should be directed to USEPA, ADEQ, or the local government entity.</p>	
11-2	<p>2.Develop an Enforceable Transportation Action Plan which restricts the movement of Toxic and Hazardous Materials and large mining equipment through the City of Douglas and surrounding areas. The restrictions should include, but not be limited to all travel on Highway 80 between Highway 191 east to Washington Avenue.</p> <p>Will the GSA agree to facilitate the development of the plan with ADOT, Cochise County, the City of Douglas and the Mining Industry Companies involved?</p>	<p>Consistent with NEPA law, regulations, and guidance, the requested actions are beyond the scope of an EIS. GSA lacks authority and jurisdiction over transportation planning in Arizona, Cochise County, and the City of Douglas to develop such comprehensive transportation plans. Respective planning, decision making, and funding responsibilities fall under the authorities and jurisdictions of the ADOT, County, and local authorities. GSA has no objections to the use of information provided in the EIS for the purposes of such planning.</p>	

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11-3	<p><u>Additional Questions/Comments on Draft EIS:</u></p> <p><u>Phelps Dodge Smelter Site/Douglas Reduction Works Site (Nearby Facilities of Concern):</u></p> <p>Pg. 3.13-4:</p> <p>Extraction Procedure Toxicity (EP Tox)(1979) Analyses concluded the slag piles were inert. As of Jan 2023, there is visible leeching from the piles.</p> <p>Question:</p> <p>Will the GSA agree to facilitate the retesting of the slag piles to determine the toxicity of the materials with the USEPA, ADEQ and Freeport-McMoRan?</p>	<p>GSA has no jurisdiction over the slag piles, which are not within any Proposed Action alternative sites. Additionally, consistent with NEPA law, regulations, and guidance, the requested actions are beyond the scope of an EIS. GSA has no objection to the performance of the requested analysis by agencies possessing appropriate jurisdiction and authority. GSA conducted soil testing within its project area to investigate potential concerns of metals contamination from the former PD smelter site and did not identify any contamination concerns directly attributed to the site, as summarized in Section 3.13 of the revised DEIS. See response to Comment 11-7 regarding consideration of groundwater contamination. See response to Comment 11-1 regarding consideration of reasonably foreseeable impacts within the EIS.</p>	
11-4	<p><u>Pg.3.13-5&amp;6:</u></p> <p>Radionuclide test (URS Greiner 1997): The report indicated elevated levels of alpha and beta gross activities in the soil and in the groundwater. It was also indicated the radiological assessment was "limited" in scope. There are reports that border patrol officers stationed on the slag piles regularly have to turn off their radiation monitors because the monitors are going off.</p> <p>Question:</p> <p>Will the GSA verify with the CBP concerning their officers and the radiation monitors.</p>	<p>The elevated levels identified in the URS Greiner study were attributed to "background" levels; in other words, the study concluded that the presence of the alpha and beta levels in the soil and groundwater were not directly a result of the slag piles. This is because soil sampling results near the slag piles were comparable to results taken from samples in locations away from the piles that were not expected to have been influenced by the piles.</p> <p>Similarly, groundwater sampling results were lower than results observed upgradient from the site (prior to passing through the site). The upgradient samples were collected at a shallower depth (20 feet below ground surface [bgs]) because groundwater near the PD smelter site was not encountered until 75 feet bgs. Regardless, this suggests that alpha and beta radiation observed is either occurring naturally or from another offsite source other than the PD smelter site. Refer to Section 3.13.1 of the DEIS for additional information on the report.</p> <p>GSA defers to the regulatory authority and expertise of USEPA and ADEQ in decision making as to what is acceptable for site investigation and clean-up requirements. With respect to the URS Greiner April 1997 report, radionuclide surface soil sampling results did not indicate concerns with gross alpha or gross beta levels beyond background levels. Regarding groundwater sampling, the use of the term 'limited' does not suggest the methods used for investigation were inaccurate; rather, the term is used to convey that the number of samples was not extensive compared to soils samples. Further, the existence of much higher radionuclide levels hydraulically upgradient of the PD Smelter Site (i.e., greater than 3.5 miles from the Proposed Action site)</p>	

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		<p>suggests that another source, either natural or manmade, may be responsible for the levels. USEPA concurred with the findings of the report, which did not suggest the need for further investigation or clean-up action for the PD smelter site.</p> <p>Based on coordination with the Office of Field Operations Tucson Field Office, there are no documented reports of Border Patrol agents having to turn off radiological monitors as the commenter suggests. Border Patrol agents regularly patrol the Douglas area, including the slag piles. Agents do not regularly carry 'radiological monitors' except at immigration checkpoints; there are no immigration checkpoints in the Douglas area. Additionally, CBP is not aware of any official reports documenting abnormal radioactivity in the Douglas area.</p>	
11-5	<p><u>Pg.3.13-5&amp;6:</u> Question: Will the GSA agree to facilitate the retesting of the smelter site for radionuclide contamination with the USEPA, ADEQ and Freeport-McMoRan?</p>	<p>GSA has no jurisdiction over the former PD smelter site, which is not within any Proposed Action alternative sites. Additionally, consistent with NEPA law, regulations, and guidance, the requested actions are beyond the scope of an EIS. GSA has no objection to the performance of the requested analysis by agencies possessing appropriate jurisdiction and authority. See response to Comment 11-1 regarding consideration of reasonably foreseeable impacts within an EIS.</p>	
11-6	<p><u>Pg. 3.13-5&amp;6:</u> Question: If the 1997 USEPA report was too narrow in its findings, wouldn't the ADEQ's clean closure permit decision in lieu of an aquifer protection permit in question, requiring the decision to be reevaluated? Will the GSA agree to facilitate discussions with the USEPA, ADEQ and Freeport-McMoRan?</p>	<p>GSA does not agree with the comment that the "1997 USEPA report was too narrow in its findings". Refer to the comment response for Comment 11-4.</p> <p>It is not within GSA's authority or responsibility to determine the acceptance or validity of USEPA or ADEQ's decisions with respect to site closure or site clean-up requirements, including related to clean closure permits. GSA has no authority or jurisdiction over the former PD smelter site. GSA has no objection to the performance of the requested analysis by agencies possessing appropriate jurisdiction and authority. The requested actions are beyond the scope of this EIS.</p>	
11-7	<p><u>Pg. 3.13-5&amp;6:</u> Question: Will the GSA agree to facilitate the retesting the groundwater for not only arsenic and lead but also copper, cadmium, mercury, cyanide and other heavy metals?</p>	<p>As described in Section 3.13 of the revised DEIS, groundwater sampling at various locations near the project area, including at the RHC LPOE and within the Alternative 2 Expansion Area as recently as 2019, have not indicated any groundwater contamination concerns that would give GSA reason to further investigate or retest groundwater. Specifically, analytical results from the groundwater samples collected from the monitoring wells in the Alternative 2 Expansion Area indicated that contaminants of concern, including various polycyclic aromatic hydrocarbons (PAHs), lead, and arsenic, were below the Arizona Aquifer Water Quality Standard and site-specific Arizona groundwater protection limits (Jacobs 2021a).</p>	

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		<p>Further, GSA is under no obligation to investigate contamination from third-party, offsite sources unless such contamination presents a health &amp; safety risk to onsite occupants or visitors via one or more exposure pathways.</p> <p>including dermal, ingestion, or inhalation. Given the depth of groundwater, no dermal exposure is anticipated. Since groundwater at the site will not be used for potable water, no ingestion exposure is anticipated. Finally, since the metals do not present a vapor intrusion risk, no inhalation exposure is anticipated.</p> <p>As discussed in the response to Comment 11-1, GSA's obligation under NEPA is to investigate "reasonably foreseeable" impacts from its Proposed Action. Based on prior sampling near the project area and the lack of potential for exposure, GSA has determined that further groundwater investigation is not warranted.</p> <p>GSA conducted soil testing within its project area to investigate potential concerns of metals contamination from the former PD smelter site and did not identify any contamination concerns directly attributed to the site, as summarized in Section 3.13 of the revised DEIS.</p>	
11-8	<p><u>Pg. 3.13-5&amp;6:</u></p> <p>Question:</p> <p>Does the GSA consider Whitewater Draw to be a wetlands? Should the EIS address its restoration?</p>	<p>The DEIS addressed wetlands in Section 3.6.1.3 under Wetlands and Waters of the U.S. GSA's responsibility with respect to wetlands is limited to any impacts caused by the Proposed Action and alternatives. Specifically, GSA would be responsible for obtaining a Section 404 permit under the Clean Water Act (CWA) for discharge of any fill materials into Waters of the U.S. Under the Proposed Action, GSA would not discharge fill materials into the Whitewater Draw, as the waterway does not flow through the project area. Restoration of wetlands already damaged by prior actions, or not located within the area of the Proposed Action, is not required of GSA as per the CWA or NEPA.</p>	
11-9	<p><u>Pg. 3.13-5&amp;6:</u></p> <p>The railroad bed north of the slag piles appears to be constructed of tailings and is also leaching minerals and is another possible location for sources of contamination.</p> <p>Question:</p> <p>Will the GSA agree to facilitate the testing and remediation of the railroad bed?</p>	<p>GSA has no jurisdiction over the railroad bed north of the slag piles, which are not within any Proposed Action alternative sites. Additionally, consistent with NEPA law, regulations, and guidance, the requested actions are beyond the scope of an EIS. GSA has no objection to the performance of the requested analysis by agencies possessing appropriate jurisdiction and authority.</p> <p>GSA conducted extensive due diligence and follow-on soil testing within its project area to investigate potential soil contamination concerns as summarized in Section 3.13 of the revised DEIS. See response to Comment 11-1 regarding consideration of reasonably foreseeable impacts within an EIS.</p>	

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11-10	<p><u>Pg. 3.13-5&amp;6:</u></p> <p>From an Environmental Justice perspective ignoring the smelter site, when it directly impacts the community, health of residents, land, and water, should be reclaimed and put back into the ecosystem. Would the GSA facilitate a discussion with the EPA and ADEQ to reconsider their rulings and place the site on the National Priorities List so that remediation can begin? There has been a voluntary effort by Freeport McMoRan to remediate other local areas, but there is no current plan to remediate or reclaim the smelter site.</p>	<p>GSA's responsibilities and authorities for environment justice analysis under NEPA are limited to the impacts that would be caused directly or indirectly by the Proposed Action. GSA's analysis of environmental justice considers ongoing exposure to various existing environmental concerns, specifically through use of the USEPA EJSCREEN model, as described in Section 3.12 of the DEIS. Refer to the response to comment 11-1 regarding consideration of reasonably foreseeable impacts in an EIS.</p> <p>GSA has no jurisdiction over the former PD smelter site. Further, decision making with respect to listing on the National Priorities List is not within the scope or responsibility of GSA as a federal agency, particularly for a parcel which it does not own or have authority over.</p>	
11-11	<p><u>Pg. 3.13-5&amp;6:</u></p> <p>The GSA determined that the pattern of the growth of the town will go toward the new commercial port, therefore, addressing the toxic nature of the smelter site, which lies in between and is "nearby" should be taken into consideration. Projected growth in this area will be impeded if reclamation does not occur.</p> <p>Question:</p> <p>What is the GSA's opinion on this matter and what are realistic solutions?</p>	<p>The DEIS reported the estimated population growth for Douglas and Cochise County in Section 3.11.1.2, which is expected to remain at or below 0% annually through 2050 for both jurisdictions. The existing and future land uses in the vicinity of the RHC LPOE and proposed Commercial LPOE are discussed in Section 3.4.1.3 of the DEIS. As stated therein, the City of Douglas and Cochise County entered into a Memorandum of Understanding (MOU) agreement in 2020 that details the services and activities each entity will provide to support potential construction of a new Commercial LPOE. Under this MOU various roles and responsibilities are defined, including the analysis of infrastructure by Cochise County and updates to the City water and wastewater master plans and zone planning areas by the City. GSA anticipates that the City and County authorities will undertake the appropriate studies and impose restrictions as necessary for future development in the SR-80 corridor.</p> <p>Please see the response to Comment 11-1 regarding the consideration of indirect effects from the PD smelter site as well as responsibility for any potential site reclamation, if determined warranted by appropriate regulatory authorities.</p>	
11-12	<p><u>Pg. 3.13-5&amp;6:</u></p> <p>Adjacent Sites:</p> <p>Another potential source of toxic contamination is the Union and Southern Pacific Railroad site south of the Douglas police station and west of Pan American.</p> <p>Question:</p> <p>Will the GSA investigate and report on the findings?</p>	<p>Please see the response to Comment 11-9.</p>	

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11-13	<p>Section 3.8 Transportation and Traffic:</p> <p>Question:</p> <p>Will the GSA verify the route of heavy mining equipment transport and toxic material transport on 80 East of Pan American?</p>	<p>The DEIS addressed the distribution of commercially owned vehicle (COV) traffic to/from the proposed Commercial LPOE and estimated that all COVs leaving the LPOE would head east on SR-80 because of restrictions on SR-80 near Bisbee, AZ. The DEIS estimated that 95% of COV traffic would then use US-191 north (with 45% of that portion heading west to California and 55% north to Tucson and Phoenix), while 5% would continue east on US-80 towards New Mexico. These assumptions are estimates based on review of the ADOT Traffic Data Management System and conversations with ADOT and the City of Douglas personnel. GSA has no control or authority over which route heavy equipment utilizes after leaving the LPOE.</p>	
11-14	<p>Section 3.8 Transportation and Traffic:</p> <p>The flow of traffic into the existing RHC LPOE cueing lanes are constrained by the lanes on the Mexican side.</p> <p>Question:</p> <p>How is the GSA going to remedy this problem?</p>	<p>The relocation of COV traffic from the RHC LPOE to the proposed Commercial LPOE five miles west under the Proposed Action would remove oversized commercial vehicles from the currently commingled traffic at the RHC LPOE and reduce congestion at the LPOE and in the City, including on the Mexican side of the U.S.-Mexico border. As discussed in Section 2.1.1 of the DEIS, Mexico's Secretary of Infrastructure and Urban Development is transferring land immediately adjacent the border at the proposed Commercial LPOE site, as well as the easement from the border to Mexican Highway 2, to build the necessary inspection infrastructure and connector roads on the Mexican side of the proposed Commercial LPOE. GSA anticipates that the Mexican authorities may also use this opportunity to improve capacity at the existing port on the southern side of the border, near the existing RHC LPOE; however, planning is in the early stages and further details are not available at this time. Regardless, expansion and modernization of the Mexican side of the LPOE is not within GSA or the U.S. government's control or authority.</p>	
11-15	<p>Section 3.8 Transportation and Traffic:</p> <p>Alternative 2 in the RHC LPOE, the site west of Pan American is not "contiguous" with the existing port and there are also vehicular access problems.</p> <p>Questions:</p> <p>How does the GSA intend to address these issues?</p> <p>Wouldn't expansion to the east of the existing CPOE be more realistic?</p>	<p>Access to the Alternative 2 Expansion Area would be addressed in the site planning and design efforts for the location if selected for the Proposed Action. The Alternative 2 Expansion Area is contiguous with the western perimeter of the existing RHC LPOE. The site is separated from the RHC LPOE by a regulatory floodway as shown in Figure 2-4, which would require appropriate design of crossings for access to the Expansion Area. Text has been added to Section 2.2 of the revised DEIS to clarify the inclusion of such crossings under Alternative 2. GSA has added Alternative 3 to the revised DEIS, which considers an alternate expansion area to the east of the RHC LPOE.</p>	
11-16	<p>Section 3.8 Transportation and Traffic:</p> <p>Questions:</p> <p>Will small commercial trucks/vans be allowed to use the RHC LPOE instead of the commercial port? What are the regulations?</p>	<p>As per 19 CFR Part 22.24(c), a "COV" is defined as any self-propelled vehicle, including an empty vehicle or a truck cab without a trailer, which is designed and used for the transportation of commercial merchandise or for the transportation of non-commercial merchandise on a for-hire basis. The</p>	

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		<p>Customs and Border Protection (CBP) considers a commercial vehicle as one that is used to carry commercial goods across the border in either direction.</p> <p>This would apply to small trucks and vans that meet this definition. Ultimately, if a vehicle, regardless of the size, is transporting goods which are considered a trade product, the vehicle would be required to process through the new Commercial LPOE and not the RHC LPOE.</p>	
11-17	<p><u>3.10 Infrastructure and Utilities:</u></p> <p>Based on the Cochise County GIS mapping system the City of Douglas Wastewater Treatment Plant is in a flood zone.</p> <p>Questions:</p> <p>What plans are there to remedy this situation so that untreated sewage does not flow into Mexico?</p>	<p>GSA lacks jurisdiction and authority over the City's wastewater treatment plant. The DEIS addressed the existing conditions at the facility in Section 3.10.1.3 and assessed the effects of the Proposed Action on facility operation in 3.10.2.3. Consideration of flooding at the plant is outside the scope of analysis for this EIS. See the response to Comment 11-1 regarding consideration of reasonably foreseeable impacts in the EIS.</p>	
11-18	<p><u>3.10 Infrastructure and Utilities:</u></p> <p>Please verify that the wastewater infrastructure pipeline from the new Commercial Port to the existing City of Douglas Wastewater Treatment Plant will be between 30,000 and 35,000 linear feet.</p>	<p>The City of Douglas plans to construct new wastewater infrastructure, including lift stations and wastewater lines along James Ranch Road and SR-80 to connect to the City's existing wastewater treatment plant. The extension of these utilities to the project area would be part of larger development planning efforts in the region by a consortium of partners (including Cochise County and the City of Douglas) that are not a part of GSA's action. Questions pertaining to the specifics of the utility infrastructure should be directed to the City or County.</p> <p>As discussed in Section 3.10.2.3 of the DEIS, GSA would tie into new service lines via the James Ranch Road ROW, pending establishment of water and wastewater utility connections by the City. The DEIS addressed the cumulative impacts of the Proposed Action in combination with foreseeable future actions affecting infrastructure and utilities in Section 4.2.2.</p>	
11-19	<p><u>3.10 Infrastructure and Utilities:</u></p> <p>Question:</p> <p>Will well water be required to enable the system to work and if so for how long will it be required?</p>	<p>As discussed in DEIS Sections 3.10.2.3 and 4.2.2, Cochise County and the City of Douglas are planning under a separate action to build a new water and wastewater system in the project vicinity to support construction of the proposed Commercial LPOE, as well as other planned development in the area. The sanitary sewer system would be designed to convey wastewater by gravity and lift stations during the full range of anticipated flows, including sustained low flow periods. There may be instances where periodic flushing is required to reduce solids from settling. Further questions pertaining to the specifics of the utility infrastructure should be directed to the city.</p>	



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11-20	<p><u>3.10 Infrastructure and Utilities:</u></p> <p>Question:</p> <p>Why is a septic system not being consider for the Commercial LPOE until surrounding development warrants the waste line?</p>	<p>Because of the ongoing planning efforts for water and wastewater service to the area by the consortium of partners as discussed in DEIS Sections 3.10.2.3 and 4.2.2, GSA has not specifically considered the use of a septic system for the proposed Commercial LPOE. As stated in Section 4.2.2, construction of surrounding utilities is anticipated to be complete prior to construction of the proposed Commercial LPOE.</p>	
11-21	<p><u>3.10 Infrastructure and Utilities:</u></p> <p>Why is GSA not drilling its own well?</p>	<p>Because of the ongoing planning efforts for water and wastewater service to the area by the consortium of partners as discussed Sections 3.10.2.3 and 4.2.2 of the DEIS, GSA has not specifically considered the use of a separate well system for the proposed Commercial LPOE.</p>	
11-22	<p><u>1.1.1:</u></p> <p>During a Douglas City Council meeting the staff informed the council and public that the Federal government would not purchase land for the POE and that the city would have to donate the land for the commercial POE.</p> <p>Question:</p> <p>Please Clarify?</p> <p>The chain of title for the Commercial LPOE is unclear. County Records show the City of Douglas purchased the land in 2004.</p> <p>Question:</p> <p>Please verify the chain of title for the property and if proper City of Douglas procedures were followed in the purchase of the land.</p>	<p>Based on a review of the title provider's research conducted by Texas Environmental Research as part of due diligence investigations for the Commercial LPOE site, the current site owner is the City of Douglas, who obtained title for the site from Raymond and Mary Hurnagel on February 1, 2000. Previous site owners included various private individuals. Questions regarding historical transactions outside of GSA's involvement should be directed to the City.</p> <p>Under the Proposed Action, the City of Douglas would transfer ownership of the 80.5-acre parcel to the federal government via donation.</p>	
11-23	<p><u>2.1:</u></p> <p>Question:</p> <p>What is Mexico's projected timing for completion of their port?</p> <p>Will they remodel their portion of the port at RHC LPOE?</p>	<p>Refer to the response to comment 10-3 regarding the timing of construction for the Mexican commercial port. Refer to the response to comment 11-14 regarding improvements at the Mexican port just south of the RHC LPOE.</p>	
11-24	<p><u>2.3:</u></p> <p>Question:</p> <p>Do all parcels in the City of Douglas have Phelps Dodge smoke easements?</p>	<p>During the due diligence process for the project, information was provided that suggests other nearby parcels may also have smoke easements; however, investigation and review of parcel data for all parcels in the City of Douglas is outside of the scope of the EIS and the requirements of GSA under NEPA, as well as due diligence requirements per American Society for Testing and Materials guidelines (E1527-21). Based on a review of parcel data for parcels considered under the Proposed Action, parcel #40769004A has a smoke easement.</p>	

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11-25	<p><u>2.4:</u></p> <p>James Ranch Road is going to be completely constructed not simply widened and resurfaced.</p> <p>Please revise statement.</p>	<p>James Ranch Road is currently unpaved, but an existing roadway ROW exists. As discussed in Section 2.1.1 of the DEIS, the road would be improved and extended to the project area by the ADOT under a separate project not affiliated with GSA's Proposed Action. Improvement would include paving as appropriate.</p>	
11-26	<p><u>3.3-12:</u></p> <p>Congestion is one of the primary reasons stated for the need to improve the RHC LPOE at about \$180 million, however the 4-5 minute reduction in wait time projected by the GSA is insignificant.</p> <p>Questions:</p> <p>How can this be improved upon? Are there no other design solutions?</p> <p>How can the GSA justify such expenditure without more significantly addressing the congestion problem and traffic flow?</p>	<p>Estimations of vehicle reduction wait time were derived from the <i>Traffic Study for the Raul Hector Castro Land Port of Entry in Douglas, Arizona</i>, dated July 10, 2018 prepared by Stantec (herein referred to as the Traffic Study). The goal of the study was to aid in the development of the Douglas Arizona Regional Feasibility Study, which informed GSA's plans to reconfigure, expand, and fully modernize the RHC LPOE, bringing it in line with the current land port design standards and CBP operational requirements.</p> <p>The Traffic Study provided recommendations specific to the number of lanes required for inbound traffic from Mexico to the U.S. that would accommodate a maximum waiting time of no more than thirty minutes for personal vehicles during the peak day of the 90th percentile peak week.</p> <p>The Traffic Study estimated that, based on a 2018 Baseline Scenario, the greatest average wait time is currently 34 minutes and 12 seconds, for POVs traveling inbound to the U.S. The Traffic Study also estimated that maximum peak wait time for POVs traveling inbound is 52 minutes and 35 seconds. Vehicle wait times based on the 2018 Baseline Scenario have been added to Section 2.1.2 of the revised Draft EIS. As such, the maximum vehicle wait time reduction could be as much as 22 minutes and 35 seconds, during peak wait times.</p> <p>Generally, vehicle wait times for all inbound and outbound traffic is expected to reduce. For purposes of the air quality analysis a 4-minute reduction was assumed on average, as a conservative metric. This was based on the greatest average vehicle wait times (34 minutes and 12 second for inbound POVs) compared to the port redesign goal to reduce peak wait times to under 30 minutes. As peak wait times can be as high as 52 minutes and 35 seconds, overall vehicle wait time reductions are expected to be greater. Notably, COV inbound traffic wait times (currently 42 minutes and 49 seconds) are expected to improve substantially with establishment of a new Commercial LPOE. Text has been revised in Section 3.3.2.3 of the revised DEIS to clarify the air quality analysis approach.</p>	

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		Please note, the justification for the Proposed Action addressed in Chapter 1 of the DEIS goes beyond just vehicle wait times. Factors include: traffic congestion in the cities of Douglas and Agua Prieta, including oversized COVs with hazardous materials traveling through urban cores of communities; safety and security risks from commingling COVs, POVs, and pedestrians through the LPOE; and demands on additional capacity to process an influx of family units and unaccompanied juveniles that require special care.	
11-27	<p><u>4.13:</u></p> <p>The estimated job growth (which could be much smaller) does not justify the potential long term exposure to the contaminated wastes present at the smelter site.</p> <p>Environmental Justice edicts require a greater consideration.</p>	Please refer to the response to comment 12-4 regarding economic benefits and job growth, and justification for such assessment. Please refer to responses to comments 11-1, 11-3, and 11-4 regarding consideration of indirect effects and potential exposure to contamination associated with the PD smelter site. Please refer to the comment response to comment 11-10 regarding environmental justice concerns.	
11-28	<p><u>4.2.3:</u></p> <p>The conditions of the existing historical buildings in the downtown area are going to require massive amounts of financial resources to retrofit the structural systems and fire suppression systems.</p> <p>Question:</p> <p>Will the GSA commit to facilitating the appropriate departments of the federal government into obtaining the funding required to rebuild the downtown?</p>	<p>GSA's responsibility for the preservation of historic buildings is limited to properties within the Proposed Action project areas or that may otherwise be affected by the project. Rebuilding of downtown area structures that are not included within project areas or that will not be affected by the project as determined in accordance with Section 106 of the National Historic Preservation Act (NHPA) is beyond GSA's responsibility. Obtaining funding for rebuilding downtown buildings is outside GSA's responsibility under Section 106. As consistent with NEPA law, regulations, and guidance, the requested actions are beyond the scope of an EIS. GSA has no objections to the use of information provided in the EIS for the purposes of seeking other federal funding.</p> <p>The DEIS identified alternatives for the reuse, relocation, or demolition of historic structures at the RHC LPOE in Section 2.1.2.1. These alternatives were evaluated in Section 3.2, Cultural Resources, as well as in every other resource section in Chapter 3. GSA would comply with the requirements of Section 106 of the NHPA with respect to future plans for historic structures.</p>	
11-29	<p><u>S-2:</u></p> <p>The draft EIS was to contain three alternatives, however, it appears that Alternative 2 (concurrent construction) is not viable because 1.) the need to keep the existing facility up and running and 2.) no land acquisition proposal east of the existing facility to provide for expansion.</p> <p>Question:</p> <p>If it was not a real possibility why was it offered as an option?</p>	The original DEIS considered two action alternatives as described in Chapter 2, in addition to a No Action Alternative. Alternative 1 would involve sequential construction of the Commercial LPOE followed by expansion and modernization of the RHC LPOE. Alternative 2 would involve concurrent construction of the Commercial LPOE with expansion and modernization of the RHC LPOE. Both alternatives would require the acquisition of additional land for construction staging and expansion of the facility footprint at the existing RHC LPOE. The additional land for Alternative 1 would be located in the Alternative 1 Expansion Area directly north of the RHC LPOE.	

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		<p>Under Alternative 2, the land requirement would be greater to accommodate concurrent construction of the Commercial LPOE while maintaining operations at the existing RHC LPOE with minimal disruption. Therefore, the additional land for Alternative 2 would include the Alternative 1 Expansion Area as well as the Alternative 2 Expansion Area directly west of the RHC LPOE. Both alternatives are considered viable by GSA. Under Alternative 2, the acquisition of additional land would allow the existing RHC LPOE to remain operational during construction through careful project phasing, as stated in Section 2.2 of the EIS.</p> <p>After publication of the original DEIS, GSA decided to consider a third action alternative and as such, has issued a revised DEIS. Similar to Alternative 2, Alternative 3 would involve concurrent construction, and would include the Alternative 1 Expansion Area. However, additional land (i.e., the Alternative 3 Expansion Area) would be acquired directly east of the RHC LPOE instead of to the west. The expansion areas are illustrated in revised Figure 2-1 in the revised DEIS. To clarify, Alternative 1 would include only the Alternative 1 Expansion Area (north); Alternative 2 would include the Alternative 1 Expansion Area plus the Alternative 2 Expansion Area (west); and Alternative 3 would include the Alternative 1 Expansion Area plus the Alternative 3 Expansion Area (east).</p>	
11-30	<p><u>S-3:</u> Questions: What is the right of way for James Ranch Road? Is the GSA going to provide half street right of way on the east, north and west property lines of the site?</p>	<p>GSA does not propose any direct change in the alignment of James Ranch Road for the proposed Commercial LPOE as part of its Proposed Action. Under a separate project not affiliated with GSA's Proposed Action, James Ranch Road would be improved and extended to the project area by ADOT. That project is being planned by ADOT to support regional future planning efforts and would also support the proposed Commercial LPOE. It is GSA's understanding that there would be no changes to the James Ranch Road right of way; however, questions related to the James Ranch Road project should be directed to Mark Sanders at ADOT (msanders3@azdot.gov). Any associated change in the ROW for James Ranch Road would require coordination between ADOT and BLM.</p> <p>ADOT, not GSA, would also construct roadways surrounding the Commercial LPOE. These roadways are shown on the updated conceptual drawing for the LPOE in Figure 2-3 of the revised DEIS.</p>	

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		As stated in the response to comment 7-1, GSA would be required to obtain a new ROW grant from the BLM for the road between the Commercial LPOE and the U.S. – Mexico border, which would be located on BLM-managed land in T. 24 S., R. 26 E., sec. 24. Text has been added to Chapter 2 of the revised DEIS stating this requirement.	
11-31	<p><u>S-3:</u> Brooks Road alignment appears to be the best alignment for entry into the Commercial LPOE.</p> <p>Question: Has the GSA considered this access point?</p>	GSA has considered but dismissed siting of the Commercial LPOE near Brooks Road. Text has been added to Section 2.5 of the revised DEIS regarding this alternative.	
ID: 12	Name: Diana LaMar	Affiliation: Private Citizen	Date: March 13, 2023
Comment		Response	
12-1	<p>Prior Scope Request Questions (unanswered or insufficiently answered, August 2022):</p> <p>Again, requesting a TENORM Study be performed and a groundwater study. The groundwater should not only look for arsenic and lead, but also copper, cadmium, mercury, cyanide and other heavy metals. Will the GSA direct the EPA and ADEQ to develop this study?</p>	Please see the response to comments 11-1 and 11-7.	
12-2	Will the GSA in conjunction with ADOT develop an Enforceable Transportation Action Plan which restricts the movement of Toxic and Hazardous Materials and large mining equipment through the City of Douglas and surrounding areas? The restrictions should include, but not be limited to all travel on Highway 80 between Highway 191 east to Washington Avenue	Please see the response to comment 11-2.	
12-3	Would you kindly define what is meant by “near” in the following Section 3.5.1.3: “Is the action located on or near an active or abandoned toxic, hazardous or radioactive materials generation, storage, transportation or disposal site?”	Clarification on the definition of the term “near” as it pertains to active or abandoned toxic, hazardous or radioactive materials generation, storage, transportation or disposal sites was addressed in Table 5-1 of the Appendix A Scoping Report in the original DEIS. Please refer to that table for clarification.	
12-4	<p><u>Questions/Comments on Draft EIS</u></p> <p><u>General</u></p> <p>Where does the belief in economic growth due to the new Commercial LPOE come from? The GSA report on jobs offers little hope for that. Increase in economic infusion for the period of time the port is being constructed is one thing, but afterwards I see no dat showing sustained</p>	As described in the DEIS Section 3.11.1.2, the populations in Douglas and Cochise County through 2050 are expected to remain relatively constant, experiencing small rates of average annual decline. However, it is important to note that these population trends are based on projections by the Arizona Commerce Authority and US Census Bureau that do not consider all potential future factors such as the Proposed Action. DEIS Section 3.11.2.3 describes the anticipated long-term favorable economic impacts from operation of the	

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	<p>economic growth and development. It appears that the population growth diminishes. Is that correct</p>	<p>Proposed Action for Alternative 1 based on a referenced analysis completed by US Economic Research in September 2020. The favorable impacts relate to the separate operation of the RHC LPOE and Commercial LPOE and would be comparable for Alternative 1, Alternative 2, and newly considered Alternative 3. This report can be made publicly available upon request to GSA.</p>	
12-5	<p>A GSA rep stated that the RHC LPOE with renovation with no commercial port was excluded as an alternative because it did not meet the goals. Please provide a detailed explanation</p>	<p>Section 2.4 of the original DEIS (now Section 2.5 in the revised DEIS) explained the alternatives considered but dismissed from detailed analysis. The alternative of modernizing the RHC LPOE only was eliminated because it would greatly limit options to improve capacity and functionality of the LPOE; it would perpetuate safety and congestion issues by commingling COV, POV, and pedestrian traffic; and it would perpetuate unsafe conditions caused by heavy trucks transporting large equipment and hazardous materials through the urban core of Douglas. Based on these factors, the modernization-only alternative would not allow GSA to fully support CBP's mission by bringing the RHC LPOE operations in line with current land port design standards and operational requirements, would not meet GSA's Purpose and Need for the Proposed Action, and was therefore not carried forward for further analysis in this EIS.</p>	
12-6	<p><u>Phelps Dodge Smelter</u></p> <p>Smelter site was tested for radiation and found there were elevated levels of radiation, in the water and in the air. The EIS states that the 1994 study took a "small sampling" and radiation levels were found in the ground water. The EPA and ADEQ determined it did not qualify to be a Superfund site. An earlier study stated slag material did not leach because of its density and based on those findings Phelps Dodge sited this document and were able to use a clean closure permit vs. an aquifer protection permit. There are reports that border patrol officers positioned at the slag heap regularly have to turn off their radiation monitors because they beep and are a constant distraction.</p> <p>Would the GSA verify these reports and document the radiation monitor findings as well as any necessary steps to confirm the safety of the officers and any other on site workers or visitors?</p>	<p>Please see the response to comment 11-4.</p>	
12-7	<p>Whitewater Draw is the main riparian area for the Douglas Basin and is also a wetlands and should be returned to its natural condition and course. Does the GSA consider Whitewater Draw a wetlands and should be addressed as such in the EIS?</p>	<p>Please see the response to comment 11-8.</p>	

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12-8	Upon visual inspection there is material leaching from the slag heap contrary to the 1972 report.	Please see the response to comment 11-3.	
12-9	The railroad bed north of the slag heap appears to be constructed of tailings and is also leaching minerals and is another possible location for sources of contamination.	Please see the response to comment 11-9.	
12-10	From an Environmental Justice perspective ignoring the smelter site, when it directly impacts the community, health of residents, land, and water, should be reclaimed and put back into the ecosystem. Doing nothing is unethical, immoral and negligent to leave the site as is. Would the GSA facilitate a discussion with the EPA and ADEQ to reconsider their rulings and place the site on the National Priorities List so that remediation can begin? There has been a voluntary effort by Freeport McMoRan to remediate other local areas, but there is no current plan to remediate or reclaim the smelter site.	Please see the response to comment 11-10.	
12-11	The GSA determined that the pattern of the growth of the town will go toward the new commercial port, therefore, addressing the toxic nature of the smelter site, which lies in between and is "nearby" should be taken into consideration. Projected growth in this area will be impeded if reclamation does not occur. What is the GSA's opinion on this matter and what are realistic solutions?	Please see the response to comment 11-11.	
12-12	<u>Adjacent Sites</u> Another potential source of toxic contamination is the Southern Pacific Railroad site just south of the police station and west of Pan American. Will the GSA investigate and report on the findings?	Please see the response to comment 11-12.	
12-13	<u>Traffic Study</u> The traffic study makes no mention of heavy mining equipment transport and toxic material transport on 80 East of Pan American. Why? This seems to be an oversight	Please see the response to comment 11-13.	
12-14	Is it possible to include a study on the preparedness of local emergency services in the event of a toxic material accident?	Transportation of hazardous materials is subject to U.S. Department of Transportation regulations (49 CFR 100-185). Storage of hazardous materials onsite at the RHC LPOE and proposed Commercial LPOE would be subject to federal Occupational Health and Safety Act (OSHA) regulations at 29 CFR 1910 Subpart H. Based on correspondence with the RHC LPOE property manager, no hazardous material accident or major environmental spill has taken place during the history of the port. For any incidents occurring on	

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		<p>LPOE Property that involve hazardous materials, CBP would secure, isolate and notify the appropriate responding agency (i.e., the Douglas Fire Department). As needed or depending in the size or scale of the response, County, regional, state, or federal authorities would be called upon for support. Text has been added to Section 3.13.1.2 describing the emergency response procedures and applicable regulations pertaining to transportation of hazardous materials.</p> <p>As discussed in Section 3.13.2.3 of the original DEIS, the Proposed Action would improve safety conditions at the ports by eliminating the commingling of traffic types, improving flow and circulation, and reducing traffic congestion. Since the Proposed Action is expected to improve safety, and existing safety procedures and regulations would be adhered to, the risk of any sort of toxic material accident is considered very low. It is expected that local or regional first responders would have the capacity to respond to any such incidents and would rely on support from regional resources in the very unlikely event of a larger incident. Therefore, GSA has determined that more detailed study on the preparedness of local emergency services is not warranted. Please refer to the response to Comment 11-1 regarding consideration of reasonably foreseeable impacts associated with the Proposed Action.</p>	
12-15	The flow of traffic into the existing site is impeded and is constrained by the layout of the entry into the cueing lanes by the lane layout on the Mexican side. How is the GSA going to remedy this problem?	Please see the response to comment 11-14.	
12-16	Alternative 2 in the RHC LPOE, the site west of Pan American is not "congruent" with the existing port and there are also vehicular access problems. How does the GSA intend to address these issues?	Please see the response to comment 11-15.	
12-17	Will small commercial trucks/vans be allowed to use the RHC LPOE instead of the commercial port? What are the regulations?	Please see the response to comment 11-16.	
12-18	<p><u>Waste Water</u></p> <p>Based on the Cochise County GIS mapping system the City of Douglas Wastewater Treatment Plant is in a flood zone. What plans are there to remedy this situation so that untreated sewage does not flow into Mexico?</p>	Please see the response to comment 11-17.	
12-19	Please verify that the wastewater infrastructure pipeline from the new Commercial Port to the existing City of Douglas Wastewater Treatment Plant will be between 30,000 and 35,000 linear feet. How much fresh water will it take for the system to flow and how long do you anticipate	Please see the response to comments 11-18 and 11-19.	



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	fresh well water will be needed to make the system work? It appears there may not be enough waste water for it to flow in the early phase without the introduction of fresh water, please verify.		
12-20	1.1 During a Douglas City Council meeting the staff informed that the Federal government would not purchase land for the POE and that the city would have to donate the land for the commercial POE, please verify. Also, chain of title for the property is unclear. Can the GSA verify when the property was transferred to the City of Douglas and that the proper City of Douglas procedures were followed to accept the parcel?	Please see the response to comment 11-22.	
12-21	1-2 The City of Douglas appears to have purchased the land in 2004 and not in 2000, please clarify and verify the transfer of land was done properly	Please see the response to comment 11-22.	
12-22	2.1 What is Mexico's projected timing for completion of their port? Will they remodel their portion of the port at RHC LPOE?	Please see the response to comment 11-23.	
12-23	2.1 How will there be vehicular access to Alternative 2 site expansion area?	Please see the response to comment 11-15.	
12-24	2.3 Do all parcels in the City of Douglas have Phelps Dodge smoke easements?	Please see the response to comment 11-24.	
12-25	2.4 James Ranch Road is going to be completely constructed not simply widened and resurfaced, language should be corrected/revised.	Please see the response to comment 11-25.	
12-26	2.4 Where are the dumping facilities located?	Comment is unclear. If the commenter is referring to disposal of any wastes that would be generated as a part of the Proposed Action, wastes would be disposed of at permitted landfills with adequate capacity in accordance with federal, state, and local regulations. Text has been added to Section 3.13.2.3 of the revised EIS clarifying the disposal location of wastes generated by the Proposed Action.	
12-27	3.6-3 Is Whitewater Draw considered a wetlands?	Please see the response to comment 11-8.	

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12-28	<p>3.3-12</p> <p>Congestion is one of the primary reasons stated for the need to improve the RHC LPOE at about \$180 million, however the 4-5 minute reduction in wait time projected by the GSA is insignificant. How can this be improved upon? Are there no other design solutions? How can the city and the GSA justify such an expenditure without more significantly addressing the congestion problem and traffic flow?</p>	<p>Please see the response to comment 11-26.</p>	
12-29	<p>3.12-9</p> <p>The statistics do not appear to include the children and low income minorities known to be crossing in and out of the area daily. Will this be addressed?</p>	<p>The analysis of impacts on environmental justice populations and children's health and safety appropriately addressed the respective populations residing in the region of influence for the Proposed Action, which are the populations most likely to be exposed to adverse conditions of the Proposed Action on a prolonged basis. GSA recognizes that children and members of minority and low-income populations cross the U.S. - Mexico border; however, members of these populations would be passing through the LPOE regardless of the Proposed Action and should not be exposed to conditions on a prolonged basis. As explained in Section 1.1 of the DEIS, one of GSA's key considerations in the planning for a separate Commercial LPOE was the concern for the commingling of COVs, POVs, and pedestrians at the existing LPOE creating safety and security risks for CBP officers and the general public, especially where pedestrians are required to cross vehicular lanes. The Proposed Action is intended to remedy these safety concerns, which would reduce potential impacts on environmental justice populations and children's health and safety for members of these populations passing through the LPOE.</p>	
12-30	<p>3.12-9</p> <p>ROI (Region of Influence) does not include Agua Prieta, but to exclude this community goes against what we know about the influx of people back and forth (additionally, how this relates to Environmental Justice). Please comment.</p>	<p>NEPA law, regulations, and guidance apply to the jurisdiction of the United States exclusively. GSA has limited the analysis to this jurisdiction. Please refer to the response to comment 12-29 regarding consideration of individuals passing through the LPOE.</p>	

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12-31	<p>3.12-9</p> <p>The GSA hasn't satisfied the "meaningful involvement" definition. Environmental Justice is the fair treatment and meaningful involvement of all people, regardless of race color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. It is not sufficient to excuse the anemic effort by the GSA to inform the public about the Scope/EIS meetings by having the "best interests" of the community in mind. If the community does not have the opportunity to sit at the table and be a part of the discussion, the federal mandate on Environmental Justice is a failure. The GSA was aware that stakeholders were not reached out to in advance of the meeting in August, that there is no local paper, and that the city did not include the public meetings on their calendar. The GSA is aware that all relevant materials were not provided in Spanish and no translator was present at either public meeting. A GSA rep acknowledged they did not know the Douglas subscription rate to the online paper (it is low). [NEPA Handbook 4.2.2.] Will the EIS Draft and final EIS be translated into Spanish? A GSA rep at the recent public meeting committed to hold an additional community meeting including a presentation and Q&amp;A session, with a Spanish translator present, if the City supported the effort. Will the GSA encourage the City to do so?</p>	<p>GSA disagrees with the commenter and asserts that it has conducted meaningful public involvement as it relates to the Proposed Action. As part of the public outreach process, GSA conducted the following:</p> <ul style="list-style-type: none"> <li>• Filed a Notice of Availability in the <i>Federal Register</i> on January 27, 2023.</li> <li>• Published three advertisements in English and Spanish in the <i>Herald Review</i>, for a total of six publications. The <i>Herald Review</i> circulation includes Douglas on Wednesdays. Publications were made on Wednesday, February 1, 2023; Wednesday, February 15, 2023; and Sunday, February 19, 2023 in advance of the public meeting. GSA understands the readership may be low but publication in this newspaper is one of many outreach tools GSA has and will continue to utilize.</li> <li>• Distributed stakeholder letters via hard copy and email on January 27, 2023 to federal agencies, state and local agencies, elected officials, and other interested parties. This mailing list was expanded from the list that was received notification prior to the original August scoping meeting to include attendees at the August scoping meeting, stakeholders who provided a comment during the comment period, local residences near the project area, other individuals who expressed interest in the project.</li> <li>• Notified federally recognized tribes in the region with a letter on January 19, 2023.</li> <li>• Made posts on GSA Region 9's website, which included project handouts and a Spanish-translated handout.</li> <li>• Made posts on GSA Region 9's social media accounts on February 14 and 22, 2023, which linked to a press release providing more details on the meeting.</li> <li>• Coordinated with the City of Douglas to post announcements of the meeting in various locations on the City's website beginning on January 27, 2023, which linked to the project stakeholder letter. The project stakeholder letter linked to GSA's website, which included additional project handouts, including Spanish-translated handouts. The City made postings directly on the City's main website home page (<a href="http://www.douglasaz.gov">http://www.douglasaz.gov</a>), the City's Civic Alert Center, and on the City Clerk website.</li> </ul>	

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		<ul style="list-style-type: none"> <li>Coordinated with the City of Douglas to post announcements on the City's social media account on February 15 and 17, 2023. The February 17 post linked to a press release providing more details on the meeting. The City of Douglas posted a Spanish-translated version of the press release as a comment on the February 17 post.</li> </ul> <p>In addition to the Spanish language newspaper notice, GSA also provided project handouts in Spanish. Both materials indicated, in Spanish, that if special assistance is needed to attend the public meeting to contact GSA. No contact was made to GSA in advance of the public meeting requesting additional translation of materials or information. City of Douglas representatives who are fluent in Spanish attended both the public scoping and DEIS meeting and provided translation support services as needed throughout the duration of the meeting. Based on coordination with City personnel, GSA determined that this level of translation support was sufficient. If additional translation services are requested by Spanish-speaking individuals, GSA will consider such requests at that time.</p> <p>As part of the revised DEIS, GSA will hold an additional public meeting. This meeting will be held in a similar format as the original DEIS meeting and GSA representatives will be available to provide explanations on the project and answer questions. The City of Douglas will be available as needed to provide translation services.</p> <p>To further assist in reaching Spanish-speakers who need assistance in attending the meeting, GSA will commit to providing a Spanish language disclaimer on certain English language public announcements, indicating, in Spanish, contact information if translation services are needed.</p>	
12-32	<p>3.12.14</p> <p>There seems to be minor socioeconomic/job benefits, not expected to be permanent and reversed after completion. San Luis LPOE EIS clearly stated most jobs were sourced out of Tucson and Phoenix. Won't that also be the case in Douglas?</p>	<p>As described in the DEIS Section 3.11.2.3, the impacts on the regional economy and employment would be short term, minor, and beneficial during construction, but the jobs and spending would end upon completion of construction. Sourcing of construction jobs at this time is unknown as it would be dependent on the construction contractor selected. However, it is anticipated that positions would be sourced from the surrounding area and would also pull from larger metropolitan areas like Tucson or Phoenix. This was acknowledged in Section 3.11.2.3 of the original DEIS.</p> <p>During operations, the impacts to the regional economy and employment would be long term, moderate to significant, and beneficial based on the</p>	

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		analysis by US Economic Research in 2020 as summarized in Section 3.11.2.3. The impacts would be comparable for Alternatives 1, 2, and 3 for construction and operation.	
12-33	<p>3.12.14</p> <p>There are high rates of asthma in the area as well as risk of developing Valley Fever with the increase in dust and particulate matter during construction. What is the GSA prepared to recommend to alleviate and reduce these risks? Will particulate monitors be located in the area and data collected regularly? What about distribution of air purifiers?</p>	<p>The DEIS addressed the impacts on air emissions, including particulate matter and fugitive dust during construction, in Section 3.3.2.3, which are essentially comparable for Alternatives 1, 2, and 3, and do not exceed the <i>de minimus</i> threshold for any criteria pollutants. GSA would implement measures to reduce impacts on air quality, including fugitive dust emissions, as described in Section 3.3.2.7 of the revised DEIS. Please see the response to comment 10-4 regarding GSA's process for committing to certain measures to reduce air emissions.</p> <p>Please note, the ADEQ is responsible for monitoring air quality data in the State of Arizona. Air quality monitor stations are located in the City of Douglas and just west of the Commercial LPOE, reference the following links:</p> <ul style="list-style-type: none"> <li>• <a href="https://azdeq.gov/air-quality-monitor?id=040031005">https://azdeq.gov/air-quality-monitor?id=040031005</a></li> <li>• <a href="https://azdeq.gov/air-quality-monitor?id=040030011">https://azdeq.gov/air-quality-monitor?id=040030011</a></li> </ul>	
12-34	<p>3.13.2</p> <p>Define COV's. Does this include small trucks and vans, "mom and pop" businesses?</p>	Please see the response to comment 11-16.	
12-35	<p>3.13.2</p> <p>How is mining equipment and hazardous materials stopped from entering Douglas? Won't traffic continue into down on 80 east into Douglas and next to Pirtleville, then continue past homes, a school and federal building? Where is the traffic study and diversion plan? Semi's will continue to come into town to the existing warehouses. Is this preventable? What incentive do current warehouse owners in downtown have to move their business out to the new CPOE area?</p>	<p>Please see the response to comment 11-2.</p> <p>GSA lacks jurisdiction to prevent traffic from traveling on surrounding roadways. As stated in Section 3.8 of the original DEIS, commercial traffic traveling east towards New Mexico would likely continue on SR-80 traveling along the outside of Douglas. Based on a review of existing traffic data and in coordination with ADOT and local government officials, traffic engineers supporting GSA estimated that approximately 5% of COVs traveling through the LPOE would travel east, with the vast majority of traffic traveling north on US-191. A traffic study and diversion plan of regional roadways over which GSA lacks jurisdiction is outside of the scope of GSA's Proposed Action or responsibility under NEPA.</p> <p>GSA understands that the City is currently in the process of considering potential initiatives to incentivize relocation and/or development; however, no decisions have been made at this time. Any incentives to local landowners to relocate their businesses would be within the jurisdiction of the local government and not within GSA's control or authority. Future inquiries</p>	

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		regarding such incentives should be directed to the City. Regardless of incentives, it is also expected that over time warehouse may relocate to near the Commercial LPOE due to increased accessibility and convenience.	
12-36	3.13.6 Regarding the beetle infestation at RHC LPOE and comment that the pesticides are washed off by stormwater, isn't this a problem?	The beetle population and pesticide usage at the RHC LPOE are discussed in Section 3.13.1.3 of the DEIS. Approved pesticides are applied by licensed pesticide applicators in accordance with manufacturer instructions and regulatory standards to avoid safety hazards and contamination. The City of Douglas, to include the RHC LPOE, is authorized under the Arizona Pollutant Discharge Elimination System (AZPDES) permit program to discharge stormwater through a Municipal Separate Storm Sewer System (MS4) outfall to Palm Grove Wash. Cochise County's Stormwater Management Program (Cochise County 2018a) and the City's stormwater management plan (SWMP) (City of Douglas 2018a) identify measures to mitigate the impact of urban activities to receiving waters.	
12-37	4.13 The estimated job growth (which could be much smaller) does not justify the potential long term exposure to the contaminated wastes present at the smelter site. Environmental Justice edicts require a greater consideration	Please see the response to comment 11-27.	
12-38	4.2.3 The condition of the existing historical buildings in the downtown area are going to require massive amounts of financial resources to retrofit the structural systems and fire suppression systems. Will the GSA commit to facilitating the appropriate departments of the federal government into obtaining the funding required to rebuild the downtown?	Please see the response to comment 11-28.	
12-39	4.5 The continued operation of the Phelps Dodge site results in long term adverse land use impacts as the site would inhibit development at or adjacent to the property. For practical economic development reasons and Environmental Justice concerns, reclamation of this site is required. Pg 223 states the "Phelps Dodge site could result in continued adverse impacts, such as contamination of soil". This land should be viable land and returned to the ecosystem. What is the opinion of the GSA? What efforts will the GSA make or support to accomplish this?	Please see the response to comments 11-1, 11-3, 11-10, and 11-11. GSA conducted soil testing within its project area to investigate potential concerns of metals contamination from the former PD smelter site and did not identify any contamination concerns directly attributed to the site, as summarized in Section 3.13 of the revised DEIS. Section 4.6 and 4.14 of the DEIS have been revised to clarify this with respect the potential for any ongoing soil contamination occurring.	

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12-40	<p>4.11</p> <p>How does the passage of the Douglas Basin AMA affect the commercial port operations and the WWTP reaching capacity by 2040?</p>	<p>Text has been added to Section 3.6 of the revised DEIS to reflect the designation of the Douglas Active Management Area (AMA) and generally describing the AMA requirements, as well implications on the Proposed Action. The AMA requirements place restrictions on irrigation of lands for agricultural purposes, which would not apply to GSA's Proposed Action. The AMA requirements also place restrictions on groundwater well development, and generally require a permit for well withdrawals greater than 35 gallons per minute. GSA will not be drilling any wells as part of the Proposed Action but will instead be a customer of the City of Douglas for water supply at both LPOEs. As development of groundwater wells that would support the Proposed Action would be conducted by the City and the County, and not by GSA, obtaining such permits would be the responsibility of the City and County and not GSA. If the water supplier issues any water restrictions on users as a result of the AMA requirements, GSA would conform with such requirements at that time. However, any requirements are unknown at this time until issuance of the permit.</p> <p>Any impacts of the AMA passage on the Douglas wastewater treatment plant and it's potential to reach capacity by 2040 are outside of the scope of this EIS. As stated in Section 4.11, it is assumed that the City of Douglas would evaluate the rates of wastewater flow into the wastewater treatment plant over time and update the facility's master plan as appropriate, to potentially include expansion of the plant prior to 2040.</p>	
12-41	<p>4.12</p> <p>Douglas cannot afford to have a negative impact on the quality of education or an increase in demand on our social services. What is the plan to mitigate this stress on our educational and community services during construction?</p>	<p>The DEIS discusses schools and community services in the City of Douglas in Section 3.11.1.2. The impacts of the Proposed Action on these resources are addressed in Section 3.11.2.3. Because the number of construction workers that would relocate to Douglas is anticipated to be small, only a minor, temporary increased demand on community services is expected from the Proposed Action. Specifically, these increases would be in the form of marginal potential increases in the need for police, fire, or emergency response services from a small, temporary increase in population. Given the relatively small temporary increase (100 workers, or 0.6 percent of the total population Douglas in a worst-case scenario of all workers temporarily relocating to the area), existing service providers are expected to be able to accommodate such increases. As stated in Section 3.11.2.3, because no additional students would be expected to relocate to Cochise County during construction, no impacts on the quality of education would be expected at Cochise County schools.</p> <p>Text has been added to Section 3.11.1.2 and Section 3.11.2.3 providing further detail on potential impacts on educational and community services</p>	

<b>ID: 12</b>		<b>Name:</b> Diana LaMar	<b>Affiliation:</b> Private Citizen	<b>Date:</b> March 13, 2023
		<b>Comment</b>	<b>Response</b>	
			from operations. Overall impacts to schools from any in-migration of staff are expected to be at most minor. Other community services (police, fire, emergency response) would be expected to have capacity to absorb small increases in population. These conditions would be comparable for Alternative 1, 2, or 3.	
12-42	S-2	The draft EIS was to contain three alternatives, however, it appears that Alternative 2 (concurrent construction) is not viable because 1.) the need to keep the existing facility up and running and 2.) no land acquisition proposal east of the existing facility to provide for expansion. If it was not a real possibility why was it offered as an option?	Please see the response to comment 11-29.	
12-43	S-3	What is the right of way for James Ranch Road? Is the GSA going to provide half street right of way on the east, north and west property lines of the site?	Please see the response to comment 11-30.	
12-44	S-3	Brooks Road alignment appears to be the best alignment for entry into the site, have you considered this?	Please see the response to comment 11-31.	
<b>ID: 13</b>		<b>Name:</b> Neil Petersen	<b>Affiliation:</b> Private Citizen	<b>Date:</b> March 13, 2023
		<b>Comment</b>	<b>Response</b>	
13-1		Here are my comments about the Raul Hector Castro Land Port of Entry and Proposed Commercial Land Port of Entry, Douglas, Arizona:  1) Table 3.8-2 (page 3.8-5) assumes a 1.1% growth rate for sufficiency of State Highway 191 and yet the estimated annual growth for commercial traffic through the new port of entry is 8.6% per year (see page 3.8-2, paragraph 2 under "Growth Rates")	The LOS results listed in Table 3.8-2, 2022 Existing LOS Results, are based on a historical POV growth rate of 1.1% (current conditions). The Proposed Action LOS results in Tables 3.8-5 and 3.8-6 are based on a POV growth rate of 2% and a COV growth rate of 8.6% (future conditions with Proposed Action).	
13-2		2) ADT (Average Daily Traffic) needs to be added to the Acronyms page.	'ADT' is utilized as an acronym only in tables throughout Section 3.8, Transportation and Traffic. Acronyms used in tables are defined in the table footnotes. Acronym definitions have been added to Table 3.8-2.	
13-3		3) Why are facilities powered with non-carbon-emitting renewables instead of gas or oil?	As stated in Sections 3.10.2 of the Infrastructure and Utilities section of the DEIS, facilities at the expanded RHC LPOE and the Commercial LPOE would utilize electricity and natural gas for operations in any of the three alternatives. However, as stated in Section 2.1, all new and modernization construction	



ID: 13	Name: Neil Petersen	Affiliation: Private Citizen	Date: March 13, 2023
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		would be designed as “net zero” ready. Renewable energy sources would be planned for future installation and provided with minimum infrastructure to accommodate the energy source (e.g., photovoltaics), if GSA decides to install such infrastructure.	
13-4	4) Figure 3.6-1, "Douglas Basin", doesn't show the ADWR Active Management Area (AMA).	The entire Douglas Groundwater Basin, as shown in Figure 3.6-1, is designated as the Douglas AMA. Please see the response to comment 12-40 for more information on text changes made to the revised DEIS regarding the AMA designation. Figure 3.6-1 has been updated to remove the Douglas Irrigation Non-Expansion Area (INA).	
13-5	5) I propose there's a significant flaw in projecting where COV traffic will travel once on Highway 191 north of Douglas. Based on living in McNeal proper full time for 8 years, well over half of existing truck traffic goes on Davis Road rather than continuing north on 191 to I-10. The route from McNeal through Tombstone and St. David to Benson for catching I-10 going west is a shorter and faster path than taking 191 to I-10. That will impose more wear and damage to the county-maintained Davis Road and it's doubtful that any funding has been allocated for the increased demand for maintenance and upgrades.	The traffic analysis in Section 3.8 considered the traffic volume to capacity (V/C) ratios and LOS on US-191 north of SR-80 for existing conditions as well as the No Action Alternative in years 2028 and 2033. The calculated LOS on US-191 was rated as "A" (free flow, <0.6 V/C) for all conditions (see Tables 3.8-2, 3.8-3, and 3.8-4). The LOS on US-191 north of SR-80 was calculated at an "A" rating also for all alternatives in years 2028 and 2033 (see Tables 3.8-5 and 3.8-6). Traffic analysis for US-191 was limited to the proximity of Douglas north of SR-80 and did not include Davis Road. GSA has no jurisdiction over transportation routes taken by freight haulers accessing or leaving RHC LPOE and cannot prevent trucks from using Davis Road as an alternate route. However, under the worst-case assumptions used in the traffic analysis, the LOS on US-191 is not expected to change for the No Action or Proposed Action alternatives. Hence, conditions on Davis Road and US-191 in the vicinity of Davis Road should not differ substantially from current status. Please refer to the response to comment 11-2 regarding jurisdiction of transportation planning and funding in Arizona.	
13-6	6) There are quality of life impacts to the residents of McNeal, Tombstone, St. David, Benson, Elfrida, Pearce, Sunsites, and Cochise resulting from increased commercial traffic. Mitigation steps including lowering town speed limits, adding traffic signal controlled pedestrian crosswalks or pedestrian bridges or tunnels, noise ordinances prohibiting use of jake brakes, more limited hours of port of entry operation, etc. should be considered in the EIS.	Please refer to the response to comment 13-5 regarding LOS ratings and traffic conditions on US-191 north of SR-80. Please refer to the response to comment 11-2 regarding jurisdiction of transportation planning and funding in Arizona. As stated in Section 2.1.1 of the EIS, the proposed Commercial LPOE would operate between the hours 6:00 a.m. and 10:00 p.m., Monday through Friday.	
ID: 14	Name: Harold Blank	Affiliation: Private Citizen	Date: March 24, 2023
Comment		Response	
14-1	Hello- I strongly support the building of the new port and improving the existing port in Douglas AZ <u>AT THE SAME TIME</u> . The existing port needs a lot of work + traffic is awful. Thank you – and I can speak if you like. I have local museum – Art Car World.	Thank you for your information and opinions.	

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