



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

March 13, 2023

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

Subject: Comments for the Draft Environmental Impact Statement for the Expansion and Modernization of the Raul Hector Castro Land Port of Entry, Cochise County, Arizona (EIS No. 20230012)

Dear Mr. Kadri:

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.

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.

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.

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. 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. Finally, as the project design is finalized, the EPA encourages continuing to identify and commit to all measures 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 appleton.zac@epa.gov.

Sincerely,

for Jean Prijatel
Manager, Environmental Review Branch