Draft
Supplemental 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

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Prepared for:
GSA Region 9

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COVER SHEET

Responsible Agency: United States General Services Administration

Title: Supplemental 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 construct flood control measures and replace or install various utilities in the vicinity of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) located at the U.S. – Mexico border in Douglas, Arizona, in the southeast corner of the state and across from Agua Prieta, Sonora in Mexico. The RHC LPOE is owned and managed by GSA and is operated by the U.S. Department of Homeland Security's Customs and Border Protection (CBP).

GSA completed a *Final Environmental Impact Statement for the Expansion and Modernization of the Raul Hector Castro Land Port of Entry and Proposed Commercial Land Port of Entry in Douglas, Arizona* in April 2024 and signed a Record of Decision (ROD) for the Final Environmental Impact Statement (EIS) on May 14, 2024. In the ROD, GSA selected the 2024 Final EIS preferred alternative, identified as Alternative 2 (Concurrent Construction – Westward Expansion), which would involve construction of a new Commercial LPOE and phased expansion and modernization of the existing RHC LPOE at the same time, with expansion primarily to the west of the existing RHC LPOE. The 2024 Final EIS and GSA's signed ROD can be viewed on GSA's project website at: https://www.gsa.gov/about-us/gsa-regions/region-9-pacific-rim/land-ports-of-entry/raul-hector-castro-land-port-of-entry/environmental-review.

During design of the RHC LPOE Expansion and Modernization Project, GSA determined that the existing Rose Avenue channel alignment could result in increased flood risk to the expanded and modernized RHC LPOE as well as additional engineering and construction costs. In addition, GSA determined additional utility work is required that was not evaluated in the 2024 Final EIS. As such, GSA is proposing a project that includes realigning a segment of the Rose Avenue channel, constructing a new stormwater basin, and replacing or installing various utility lines. The project may also include acquiring additional land or obtaining appropriate land use agreements, as well as obtaining necessary permissions to implement these changes. As a result of these proposed changes to the 2024 Final EIS preferred alternative, GSA has determined that supplemental NEPA analysis is required. GSA has prepared this Supplemental EIS (SEIS), which examines the project purpose and need; alternatives considered; existing environment that could be affected; potential impacts resulting from each of the alternatives; and proposed best management practices and/or mitigation measures. This SEIS considers two alternatives: Alternative 1 (Flood Control and Utility Upgrades) and the No Action Alternative.

GSA is soliciting comments from interested persons and stakeholders on the Draft SEIS during a 45-day comment period. The public was notified of the Draft SEIS public hearing through publication of a Notice of Availability in the *Federal Register* and in the *Herald Review*, as well as letters mailed to interested parties. Comments received during the 45-day comment period will be considered in preparation of the Final SEIS and will be made part of the Administrative Record.

Comments on this Draft SEIS may be emailed to Osmahn.Kadri@gsa.gov or sent to:

Potomac-Hudson Engineering, Inc.
Attention: RHC LPOE Draft SEIS
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 Draft SEIS public hearing, or for further information concerning this Draft SEIS, 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 construct flood control measures and replace or install various utilities in the vicinity of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) located at the U.S. – Mexico border in Douglas, Arizona, in the southeast corner of the state and across from Agua Prieta, Sonora in Mexico. 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.

ENVIRONMENTAL REVIEW PROCESS

GSA has prepared this Supplemental Environmental Impact Statement (SEIS) in accordance with the National Environmental Policy Act (NEPA) (42 United States Code [U.S.C.] 4321 *et seq.*) as amended by the Fiscal Responsibility Act of 2023 (Public Law 118-5), GSA Order ADM 1095.1F (*Environmental Consideration in Decision Making*), the GSA Public Buildings Service's *NEPA Desk Guide*, and other relevant laws, regulations, and Executive Orders (EOs), including the National Historic Preservation Act (NHPA). This SEIS discloses the environmental impacts that would result from the Proposed Action and No Action Alternative.

A Notice of Intent (NOI) for the SEIS was published in the *Federal Register* on October 8, 2024, indicating the public scoping period would begin on October 11, 2024. 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 October 11, 16, and 20, 2024 in both English and Spanish language. Announcements were posted on GSA's social media accounts on October 15, 2024. The City of Douglas also posted announcements of the meeting on the city's social media accounts on October 15, 16 and 22, 2024 in English and Spanish. Additionally, GSA mailed scoping letters dated October 11, 2024 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 a SEIS 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 November 11, 2024.

GSA is soliciting comments from interested persons and stakeholders on this Draft SEIS during a 45-day comment period. Substantive comments received during the 45-day comment period will be considered in preparation of the Final SEIS and will be made part of the Administrative Record.

INTRODUCTION

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. The city 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.

The RHC LPOE is located at the intersection of 1st Street and Pan American Avenue. 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 the City of Douglas. Adjacent land within the 2024 Final Environmental Impact Statement (EIS) preferred alternative project area includes a small city park, a cluster of small shops, and undeveloped land.

Commercial and industrial warehouses exist along the eastern perimeter of the RHC LPOE, along Customs Avenue and 1st Street.

The RHC LPOE is located on approximately 6 acres with facilities owned and managed by GSA and operated by CBP. The project area is located west of the existing RHC LPOE and Pan American Avenue, south of East 3rd Street, north of Border Road and the U.S. – Mexico border, and just west of Chino Road.

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 LPOE 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 CBP, and is a full-service, multi-modal facility where CBP officers inspect COVs, POVs, and pedestrians.

GSA completed a *Final Environmental Impact Statement for the Expansion and Modernization of the Raul Hector Castro Land Port of Entry and Proposed Commercial Land Port of Entry in Douglas, Arizona* in April 2024 (GSA 2024a), herein referred to as the 2024 Final EIS. GSA signed a Record of Decision (ROD) for the 2024 Final EIS on May 14, 2024. In the ROD, GSA selected the preferred alternative, identified as Alternative 2 (Concurrent Construction – Westward Expansion), herein referred to as the 2024 Final EIS preferred alternative, which would involve construction of a new Commercial LPOE and phased expansion and modernization of the existing RHC LPOE at the same time, with expansion primarily to the west of the existing RHC LPOE. GSA approved sub-alternative 2d (combination of adaptive reuse, relocation, and demolition), identified as the preferred alternative for the management of historic structures at the RHC LPOE. As planning for this undertaking has continued, in Section 106 consultation with the SHPO and consulting parties, GSA has identified demolition of the historic Main Building and Garage as the preferred approach to the historic structures at the RHC LPOE. The 2024 Final EIS and GSA's signed ROD can be viewed on the GSA project website at: https://www.gsa.gov/about-us/gsa-regions/region-9-pacific-rim/land-ports-of-entry/raul-hector-castro-land-port-of-entry/environmental-review.

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

GSA has prepared this SEIS for the purpose of analyzing potential environmental impacts from realignment of a segment of the Rose Avenue channel, construction of a new stormwater basin, and replacement and installation of various utility lines; all of which were identified as necessary components of the RHC LPOE Expansion and Modernization Project after the release of the 2024 Final EIS and May 2024 ROD. SEISs are prepared, published, and filed in the same fashion as a draft or final EIS.

Where applicable, this SEIS incorporates by reference information and analysis previously presented in the 2024 Final EIS (available online at the GSA project website provided above) and focuses on new

information related to changes in project development and site conditions. Where applicable, this SEIS references and summarizes the relevant sections of the 2024 Final EIS that contain additional relevant information.

Section 1.1 of the 2024 Final EIS provides additional background information on the RHC LPOE and RHC LPOE Expansion and Modernization Project.

PURPOSE AND NEED

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

The purpose of this project considered within this supplemental analysis is to address overall flood control and utility requirements (i.e., stormwater, electrical, sanitary sewer, and fiber optic), as well as improve port operational efficiency for the RHC LPOE Expansion and Modernization Project. The project is needed to avoid engineering conflicts between the current alignment of the Rose Avenue channel with the current proposed layout for the expanded and modernized RHC LPOE; to divert stormwater away from and reduce flooding risks at the RHC LPOE; to provide sufficient stormwater capacity for the expanded and modernized RHC LPOE; and to enhance overall functionality and safety. In addition, the project is needed to meet proposed utility requirements of the expanded and modernized RHC LPOE and bring them in line with current land port design standards and operational requirements. Existing electrical lines are also located within the area proposed for realignment of a segment of the Rose Avenue channel and power the city's Wastewater Treatment Plant (WWTP), located west of the existing RHC LPOE. These lines need to be relocated to maintain electrical service to the WWTP as well as to satisfy CBP design requirements, which prohibit overhead lines within LPOE boundaries.

SUMMARY OF THE PROPOSED ACTION AND ALTERNATIVES

The Proposed Action is defined as constructing flood control and utility upgrades in support of the RHC LPOE Expansion and Modernization Project. The Proposed Action would include the realignment of a segment of the Rose Avenue channel, construction of a new stormwater basin west of the 2024 Final EIS preferred alternative project area, and replacing and installing various utility lines in the vicinity of the RHC LPOE. The Proposed Action would support and interconnect with design elements from the 2024 Final EIS preferred alternative as described above. The Proposed Action would include site preparation, including demolition of the existing stormwater channel segment (west of the existing site), and a portion of CBC within the 2024 Final EIS preferred alternative project area; potential land acquisition or establishment of applicable land use agreements in the vicinity of the Proposed Action; realignment of a segment of the Rose Avenue channel and associated stormwater channel system components; repair of CBC and road systems impacted by the Proposed Action; and other various utility or ancillary facilities constructed in support of the RHC LPOE Expansion and Modernization Project.

As part of the decision-making process, GSA is carrying forward one action alternative (Alternative 1 – Flood Control and Utility Upgrades) and the No Action Alternative for analysis in this SEIS.

Alternative 1 – Flood Control and Utility Upgrades

Under Alternative 1, GSA proposes to construct flood control and utility upgrades in the vicinity of the RHC LPOE that were not included in the 2024 Final EIS. The proposed layout provided in Figure 2-1 in

Chapter 2 of the SEIS represents a preliminary concept site plan for development and is used as a basis for discussion and environmental analysis.

Alternative 1 would consist of the following:

- Construct an approximately 2,750-foot-long stormwater channel that is anticipated to be a primarily riprap-lined open channel along the entire route. A small, approximately 50-foot segment of the stormwater channel where it meets Border Road would be concrete-lined to facilitate vehicle access. GSA is also considering construction of the entire proposed channel segment as an open, concrete-lined channel, although the riprap-lined open channel design is the current preference. The proposed stormwater channel would originate at an extended CBC located beneath the existing POV lanes south of the RHC LPOE inspection area and generally travel west, north of Border Road, and terminate at the unnamed wash west of Chino Road at the U.S – Mexico border. Water flowing out of this proposed channel would proceed south along the unnamed wash across the U.S. – Mexico border as it does under existing conditions. The proposed alignment of the channel segment would avoid, as much as possible, existing utility components such as utility poles, sewer manholes, utility vault, the Border Road and sewer mains.
- Evaluate and improve the existing CBC beneath the LPOE. A portion of the existing CBC may be maintained in place.
- Extend the existing CBC to the west and terminate it immediately west of the planned repatriation drop off location at the southern end of the expanded and modernized LPOE. Demolition of existing structures would be limited to only a portion of the existing CBC that needs to be removed.
- Demolish the existing stormwater channel segment that parallels the western side of Pan American Avenue between East 3rd Street and the southern end of the existing RHC LPOE. The upstream end of the existing channel would then be transitioned to the surrounding adjacent grade and rock riprap would be placed on the exposed surface. Alternatively, the existing stormwater channel segment may be reused as conduit or other purposes during the expansion and modernization of the RHC LPOE.
- Install a new CBC where the proposed stormwater channel crosses Chino Road. This would also include repairing the portions of Chino Road that are impacted by improving the CBC in that area, and may require lowering a segment of an existing 8-inch water line that is located in close proximity to this CBC. A portion of Chino Road south of East 3rd Street may have to be partially or completely closed during construction of the CBC.
- As necessary, construct a maintenance road on either the north or south side of the proposed stormwater channel for maintenance access. This could also include a crossing or bridge over the proposed stormwater channel, as well as installation of guard rails as needed.
- Potentially construct security fencing on the north side of the proposed stormwater channel.
- Construct a new approximately 6.2-acre stormwater basin between the RHC LPOE and Chino Road and north of the proposed stormwater channel. The stormwater basin would be designed for temporary water storage with a 36-hour drain time, in compliance with City regulations, rather than a retention basin for permanent water storage.
- Obtain all necessary land and right-of-way permissions as applicable for the realigned stormwater channel segment and new stormwater basin. This could include acquiring, obtaining easements, or obtaining similar land use agreements on portions of land within a proposed additional expansion area totaling approximately 24 acres currently owned by the City of Douglas and a private landowner. This may also include a new right-of-way grant from the Bureau of Land Management (BLM) if any portions of BLM land are required for construction.

- Replace or install approximately 6,500 feet of electrical lines, 4,700 feet of sanitary sewer line, and 1,400 feet of fiber optic lines in the vicinity of the RHC LPOE:
    - West of Pan American Avenue, existing aboveground electrical lines would be removed and re-routed to tie into existing service lines. The exact route of the electrical line west of Pan American Avenue is not known at this time and would be determined during design; however, the alignment would occur within some section of the potential disturbance area for electrical utilities identified in Figure 2-1 (see Chapter 2 of the SEIS). Newly installed electrical lines may consist of either aboveground pole-mounted lines, buried lines, or a combination of both. Burial of lines would require trenching. GSA has estimated that less than one acre of land would be disturbed during installation of this segment.
    - West of Pan American Avenue, an existing sanitary sewer line would need to be temporarily extended and realigned to Chino Road, south of East 3rd Street so as to maintain service during construction and temporarily avoid conflicts with the realigned Rose Avenue channel segment construction footprint. This would include construction of a new manhole and establishing a new connection to an existing manhole at a sanitary sewer line east of Chino Road. Permanent sanitary sewer service for the expanded and modernized RHC LPOE is expected to tie into the existing alignment along East 3rd Street near the intersection with Pan American Avenue. At the western terminus of East 3rd Street with the intersection of Chino Road, the sanitary sewer line would need to be extended west towards the WWTP, due to engineering conflicts between the proposed stormwater channel and existing sanitary sewer line along the Chino Road alignment south of East 3rd Street. The exact alignment of the new sanitary sewer connection west of Chino Road is unknown but would occur somewhere within the potential disturbance area for wet utilities as shown in Figure 2-1, and is expected to temporarily disturb no more than 4.4 acres. In the long term, it is expected that the existing sanitary sewer lateral within the Chino Road alignment south of East 3rd Street, as well as portions of the existing sanitary sewer lines within the project area west of the expanded and modernized RHC LPOE, would be abandoned or removed.
    - East of Pan American Avenue, electrical, sanitary sewer, and fiber optic lines would be installed around the 2024 Final EIS preferred alternative project area. Similar to utility work occurring west of Pan American Avenue, newly installed electrical lines may consist of either aboveground pole-mounted lines, buried lines, or a combination of both. Burial of lines would require trenching. Sanitary sewer and fiber optic lines are anticipated to require trenching. Sanitary sewer line work may be conducted in conjunction with abandonment of the existing line west of Pan American Avenue.
    - All construction work for these proposed utility lines would be conducted within existing or newly established rights-of-way (estimated at approximately 25 feet wide for electrical and sanitary sewer and approximately 15 feet wide for fiber optics) and would connect to utility lines owned and operated by the City of Douglas or local utility providers. No additional land acquisition would be required for the replacement and installation of these utility lines beyond what is already being considered for the realigned stormwater channel segment and new stormwater basin. GSA would obtain all necessary land use and right-of-way permissions, as required. Electrical work may ultimately be conducted by the local utility provider rather than GSA.

Stormwater would still flow through the segment of the unnamed wash from the existing discharge point and proposed new discharge point of the Rose Avenue channel as shown in Figure 2-1 (see Chapter 2 of the SEIS) from properties located to the north, northeast, and east; however, the amount of stormwater flowing through the wash in this segment would be reduced due to flow being diverted from the realigned

Rose Avenue channel. GSA is in the process of conducting hydrology studies to investigate overall changes in flow through the existing and proposed stormwater channels as well as into the unnamed wash and will provide available updates in the Final SEIS.

The timeframe for agency coordination and construction is tentative and is subject to change. However, for the purpose of this SEIS, design and agency coordination for Alternative 1 is anticipated to take approximately one year to complete, and construction is anticipated to take approximately 6 months in total to complete. Construction of the utility upgrades (i.e., stormwater, electrical, sanitary sewer, and fiber optic) is expected to occur during the construction of the RHC LPOE Expansion and Modernization Project as considered in the 2024 Final EIS. Construction of the realigned Rose Avenue channel segment is expected to occur prior to construction of the RHC LPOE Expansion and Modernization Project as considered in the 2024 Final EIS. During construction of the realigned Rose Avenue channel segment, it is estimated there could be approximately 20 worker vehicles, 20 delivery vehicles for construction supplies, and 10 haul trucks per day to the project area for deliveries and waste removal. The number of workers and vehicle trips for construction of utility upgrades would be consistent with levels evaluated in the 2024 Final EIS. All construction and demolition waste would be disposed of and recycled at authorized facilities. GSA would implement appropriate traffic control measures and install signage on local roadways during construction to manage construction vehicle traffic.

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

No Action Alternative

The No Action Alternative is included and analyzed to provide a baseline for comparison with impacts from the Proposed Action (Section 102(C)(iii) of NEPA [42 U.S.C. § 4332]). The No Action Alternative assumes that GSA would not demolish portions of the existing stormwater channel; would not realign a segment of the Rose Avenue channel; would not construct a new stormwater basin; and would not replace or install electrical, sanitary sewer, fiber optic utilities, or any other associated supporting facilities. In addition, no acquisition or establishment of land use agreements would occur on parcels of land proposed for the project.

In general, this alternative would not meet the purpose and need for the Proposed Action, as identified in Chapter 1. Under the No Action Alternative, the RHC LPOE Expansion and Modernization Project would be constructed as described in the 2024 Final EIS. The overall stormwater management and flood control needs for the expanded and modernized RHC LPOE would not be addressed; stormwater flow would not be diverted; electrical, sanitary sewer, and fiber optic requirements would not be met; and engineering conflicts between the current alignment of the Rose Avenue channel and the RHC LPOE Expansion and Modernization Project layout would remain. As a result, the No Action Alternative would increase flood potential at the expanded and modernized RHC LPOE and surrounding area, increasing risks that the RHC LPOE could be partially shutdown or impacted during a storm event, impeding the LPOE's functionality, and jeopardizing the security and safety at the RHC LPOE. In addition, the utility requirements for the expanded and modernized RHC LPOE would not be met, lessening the port's operational efficiency and its ability to support the CBP mission.

Although the No Action Alternative does not meet the purpose and need for the project, this alternative is carried forward to provide a baseline for comparison of effects from implementing Alternative 1.

IMPACT COMPARISON MATRIX

Table S-1 provides a comparison of potential environmental impacts resulting from the alternatives considered within this SEIS. Potential impacts are summarized for each resource area affected by the alternatives. Chapter 3 of this SEIS contains detailed discussion of these potential impacts by resource area.

Table S-1. Summary Comparison of Alternatives

Alternative 1 – Flood Control and Utility Upgrades	No Action Alternative
Cultural Resources	
Construction: Proposed construction activities would result in ground disturbance within the expanded project area, which is mostly vacant and undeveloped with portions located in existing rights-of-way. The undertaking has already been determined to have adverse effects under NHPA due to the proposed demolition of historic properties, but additional adverse effects and direct, significant, adverse impacts under NEPA to cultural resources could occur during construction if archeological resources are encountered during construction. GSA is continuing consultation with the SHPO and consulting parties under Section 106 of the NHPA. GSA will conduct a cultural resources survey to complete the identification of historic properties within the project area and provide updates in the Final SEIS. **Operation**: No adverse effects under NHPA and less-than-significant impacts under NEPA to cultural resources would be expected during operations.	Adverse effects to historic properties under NHPA associated with the undertaking would be limited to the previously defined APE in the 2024 Final EIS.
Impact Reduction Measures: Prior to construction, GSA would implement the following measures: • Develop an archeological monitoring plan in consultation with SHPO, ACHP, federally recognized Indian tribes, and other consulting parties to reduce impacts from ground-disturbing activities. • Identify and develop appropriate measures to avoid, minimize or mitigate adverse effects on historic properties in consultation with the SHPO and other applicable consulting parties.	
Air Quality	
Construction: Short-term, minor, adverse, direct and indirect impacts on regional air quality due to dust and emissions from construction equipment and vehicles. Emissions would not exceed ***de minimis*** thresholds for any criteria pollutants. **Operation**: Long-term, negligible, adverse, and indirect impacts.	Impacts on air quality would be limited to those described in the 2024 Final EIS. No other impacts on air quality would be expected.
Impact Reduction Measures: Air quality impact reduction measures for the 2024 Final EIS preferred alternative were adopted in the May 2024 ROD and are incorporated herein by reference. In addition, GSA would take the following additional steps to minimize emissions: • Use cement blended with the maximum feasible amount of fly ash or other materials that reduce emissions from cement production. • Recycle construction debris to the maximum extent feasible. • Consider using locally sourced materials to reduce transportation emissions.	
Land Use	
Construction: Short-term, minor, adverse, and direct impacts from changes in land use designations that would occur prior to construction. Direct or indirect adverse impacts on adjacent landowners are not anticipated. **Operation**: Permanent, minor to moderate, beneficial, and direct and indirect impacts due to improvement of undeveloped, underutilized space for flood control and utility needs in the vicinity of the project. In addition, maintenance of the stormwater channel, new stormwater basin, and other proposed utility upgrades	Impacts on land use would be limited to those described in the 2024 Final EIS. No other impacts to land use would be expected.

Table S-1. Summary Comparison of Alternatives

Alternative 1 – Flood Control and Utility Upgrades	No Action Alternative
would be required to ensure their continued effectiveness. Direct or indirect adverse impacts on adjacent landowners are not anticipated.	
Impact Reduction Measures: Consideration of local zoning laws and all design requirements of state and local governments to the extent practicable. Additionally, GSA would continue coordination efforts with applicable stakeholders.	
Geology and Soils	
Construction: Short-term, minor, adverse, and direct impacts on geology; long-term, minor, adverse, and direct impacts on topography; and permanent, minor, adverse, and direct impacts on soil due to ground disturbing activities and reshaping sloped terrain. Construction would disturb up to approximately 33.2 acres of both previously disturbed and undisturbed soils. **Operation**: No impacts to geology or topography. Long-term, minor, beneficial, and indirect impacts on soils due to improved stormwater flow and drainage, reducing soil erosion compared to existing conditions.	Impacts to geology and soils would occur from construction and operations of the 2024 Final EIS preferred alternative. No other direct disturbances to geology, topography, or soils would be expected; however, long-term, moderate, adverse, and indirect impacts to soils in the surrounding area could result, as the expanded and modernized RHC LPOE would lack adequate stormwater management facilities if the new stormwater basin is not constructed, resulting in increased offsite erosion.
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 the design and the Arizona Stormwater CGP.	
Water Resources	
Construction: No impacts to groundwater. Short-term, negligible, adverse, and direct impacts on regional water supply due to increased water use during construction activities. Short-term, minor, adverse, and indirect impacts to downstream surface waters due to increased potential for sedimentation and contamination. Long-term, minor, beneficial, direct and indirect impacts to floodplains due to improved flood controls. GSA will survey the project area to determine impacts to wetlands and waters of the U.S. and provide updates in the Final SEIS. **Operation**: Long-term, minor, beneficial, and direct impacts to surface waters as a result of altered hydrology due to diversion of stormwater flows, as well as long-term, moderate, beneficial, and indirect impacts due to improved stormwater management within and near the project area. Flooding potential would also be reduced. No additional subsurface disturbance would be required, other than for occasional repair and maintenance, resulting in negligible adverse impacts.	Impacts to water resources would occur from construction and operations of the 2024 Final EIS preferred alternative. No other direct impacts to groundwater or wetlands. Long-term, moderate, adverse, and indirect impacts to water resources as the overall stormwater management and flood control needs for the expanded and modernized RHC LPOE would not be addressed. Flood potential could increase onsite and in the surrounding area.
Impact Reduction Measures: Water resources impact reduction measures for the 2024 Final EIS preferred alternative were adopted in the May 2024 ROD and are incorporated herein by reference. In addition, GSA would consider incorporating bioswales or permeable pavements in the project design where applicable to enhance stormwater management capabilities.	
Biological Resources	
Construction: Permanent, moderate, adverse, and direct impacts to biological resources due to ground disturbance and vegetation removal, potentially altering the existing ecological community and contributing to minor habitat fragmentation from permanent habitat removal. Short-term, moderate, adverse, and indirect	Impacts to biological resources would occur from construction and operations of the 2024 Final EIS preferred alternative. No other direct disturbance to biological resources would occur; however, ongoing flooding would have the potential to cause periodic disturbances to vegetation and habitat, resulting in long-

Table S-1. Summary Comparison of Alternatives

Alternative 1 – Flood Control and Utility Upgrades	No Action Alternative
impacts to wildlife due to increased human activity, fugitive dust, and noise. Proposed Action may effect, but is not likely to adversely affect special status species, including federally endangered or threatened species. GSA previously consulted with USFWS per Section 7 of the ESA as part of the 2024 Final EIS and is continuing consultation as part of this Proposed Action (see Appendix B). **Operation**: Long-term, minor, adverse, and indirect impacts to wildlife habitat due to altered hydrology and diversion of water flows.	term, intermittent, minor to moderate, adverse direct impacts.
Impact Reduction Measures: Biological resources impact reduction measures for the 2024 Final EIS preferred alternative were adopted in the May 2024 ROD and are incorporated herein by reference. Additionally, GSA would implement the following measures: • An occupancy survey would be conducted to determine if any western burrowing owls are present within the project area in accordance with the Burrowing Owl Project Clearance Guidance for Landowners (AZGFD 2009). The survey would be conducted by a surveyor who is certified by AZGFD or has similar training and qualifications. If an active burrowing owl burrow is detected, GSA would contact AZGFD and USFWS for further direction. • To the extent practicable, vegetation clearing or trimming would be avoided in the project area during the migratory bird nesting season (generally between January and June). If clearing or trimming is required during the nesting season, surveys would be conducted by a qualified biologist to determine if any nesting birds occur in the project area prior to removal or trimming of vegetation. If nesting birds are present, removal or trimming of the vegetation would be delayed until after nesting season, or GSA would coordinate with the USFWS for additional technical assistance in complying with the MBTA. • To the extent practicable, the amount of time any open trench or large hole is left open would be minimized. When trenches or large holes cannot be backfilled immediately, escape ramps (e.g., short lateral trenches or wooden planks sloping to the surface) would be installed in each hole and at least every 295 feet (90 meters) in a trench. Slopes would be less than 45 degrees and trenches and holes that have been left open would be inspected to remove any wildlife prior to backfilling. • Pre-construction presence/absence surveys for any bald or golden eagles would be completed to determine if there is a need to remove potentially suitable habitat within the project area. Surveys would be conducted pursuant to local USFWS field office requirements. The need for any restrictions around tree clearing, if any, would be determined in coordination with applicable federal resource agencies pending survey results. If the project is determined to have potential to disturb or kill bald or golden eagles, GSA would obtain a permit under the BGEPA. • Use drought-resistant native vegetation for landscaping around the new stormwater basin.	
Infrastructure and Utilities	
Construction: Short-term, minor, adverse, and direct impacts on roadway infrastructure; short-term, minor, adverse, and indirect impacts to utilities within the project area due to an increased potential for intermittent interruptions in service; and short-term, negligible, adverse, and indirect impacts on water demand and wastewater services. **Operation**: No impacts to infrastructure are anticipated. Permanent, moderate, beneficial, and direct impacts on stormwater management facilities, as the upgraded system would optimize stormwater flow and drainage in the project area. Permanent, minor, beneficial, and direct impacts on sewer utilities as a result of upgraded sewer system capacity. Permanent, moderate, beneficial, and direct impacts to electrical infrastructure through replacement or installation of approximately	Impacts to infrastructure and utilities would occur from construction and operations of the 2024 Final EIS preferred alternative. In addition, long-term, moderate, adverse, and indirect impacts would result, as the overall stormwater management and flood control needs for the RHC LPOE would not be addressed. Additional strain would be placed on the existing and surrounding utilities. Without upgrades to electrical, sanitary sewer, and fiber optic utilities, the RHC LPOE Expansion and Modernization Project would not have sufficient utility capacity or necessary utility requirements to achieve compliance with CBP design requirements, lessening the port's operational efficiency and its ability to support the CBP mission.

Table S-1. Summary Comparison of Alternatives

Alternative 1 – Flood Control and Utility Upgrades	No Action Alternative
6,500 feet of electrical lines. Maintenance of the proposed stormwater channel segment, new stormwater basin, and other proposed utility upgrades would be required to ensure their continued effectiveness.	
Impact Reduction Measures: • Prioritizing native plant species when introducing new vegetation. This could include using native, drought-resistant vegetation around the new stormwater basin to reduce maintenance needs and enhance water conservation. • To avoid or limit potential for utility service interruptions, existing utility maps would be reviewed, and utility companies would be contacted in advance of construction to identify locations of utility lines potentially affected. • Implement a maintenance plan that includes regular inspections and cleaning of the stormwater management facilities to ensure its continued effectiveness.	
Human Health and Safety	
Construction: Short-term, negligible to minor, adverse, and direct impacts comparable to those described in the 2024 Final EIS, which is incorporated herein by reference. Additionally, short-term, negligible, adverse impacts related to hazardous materials and waste handling could occur. **Operation**: Long-term, minor, beneficial, and direct impacts resulting from reduced flood risk. Design would also address scoping comments raised regarding the potential for drownings during major storm events (i.e., through the use of gradual slopes and safety barriers, as applicable). Negligible adverse impacts related to hazardous materials and waste handling.	Impacts to human health and safety would occur from construction and operations of the 2024 Final EIS preferred. In addition, long-term, moderate, adverse, and indirect impacts due to increased flood potential at the expanded and modernized RHC LPOE and surrounding area.
Impact Reduction Measures: Human health and safety impact reduction measures for the 2024 Final EIS preferred alternative were adopted in the May 2024 ROD and are incorporated herein by reference. GSA would take the following additional steps to reduce impacts: • Safety measures would be implemented around the stormwater basin, such as proper signage, safety barriers, and gradual slopes to minimize drowning risks. Fencing on the north side of the proposed stormwater channel may be considered pending final design. • Regular inspections and maintenance of the stormwater management facilities would be conducted to ensure its continued safe operation and structural integrity. • During removal and replacement of electrical lines, appropriate safety protocols, including de-energizing lines as applicable, ensuring proper grounding, and using protective barriers, would be implemented to prevent electrical hazards. • Trenching safety measures such as shoring, trench boxes, and worker safety training would be implemented as applicable to minimize risks associated with excavation and confined space entry. • As necessary, the need for further due diligence would be considered within potential disturbance area for utilities as shown in Figure 2-1 prior to construction. This could include ground penetrating radar within the potential disturbance area for wet utilities west of Chino Road prior to construction to investigate for presence of subsurface objects associated with the former PD Smelter Site. • Construction workers, including utility providers, working in any potential disturbance areas for utilities would wear appropriate personal protective equipment during construction as necessary to avoid impacts from potentially contaminated soils, and would characterize any soils that are to be disposed of offsite to determine appropriate management and disposal requirements in accordance with federal, state, and local regulations.	

ACHP = Advisory Council on Historic Preservation; APE = Area of Potential Effect; AZGFD = Arizona Game and Fish Department; BGEPA = Bald and Golden Eagle Protection Act; CBP = U.S. Customs and Border Protection; CGP = Construction General Permit; EIS = Environmental Impact Statement; ESA = Endangered Species Act; GSA = U.S. General Services Administration; LPOE = Land Port of Entry; MBTA = Migratory Bird Treaty Act; NEPA = National Environmental Policy Act; NHPA = National Historic Preservation Act; RHC = Raul Hector Castro; ROD = Record of Decision; SHPO = State Historic Preservation Officer; USFWS = United States Fish and Wildlife Service; UST = underground storage tank; VOC = volatile organic compound

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ACRONYMS

Acronym	Definition
ACHP	Advisory Council on Historic Preservation
ADEQ	Arizona Department of Environmental Quality
ADWR	Arizona Department of Water Resources
APE	Area of Potential Effect
AZGFD	Arizona Game and Fish Department
AZPDES	Arizona Pollutant Discharge Elimination System
BGEPA	Bald and Golden Eagle Protection Act
BLM	Bureau of Land Management
BMP	best management practices
CAA	Clean Air Act
CBC	concrete box culvert
CBP	U.S. Customs and Border Protection
CFR	Code of Federal Regulations
CGP	Construction General Permit
CLOMR	Conditional Letter of Map Revision
CO	carbon monoxide
CWA	Clean Water Act
EO	Executive Order
EIS	Environmental Impact Statement
EISA	Energy Independence and Security Act
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FMCSA	Federal Motor Carrier Safety Administration
GSA	U.S. General Services Administration
I-10	Interstate 10
IPaC	Information for Planning and Consultation System
LOMR	Letter of Map Revision
LPOE	Land Port of Entry
m^3	cubic meter
MBTA	Migratory Bird Treaty Act
MS4	Municipal Separate Storm Sewer System
N/A	not applicable
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NO_2	nitrogen dioxide
NO_x	nitrogen oxides
NOI	Notice of Intent
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places

Acronym	Definition
O_3	ozone
PD	Phelps Dodge
$PM_{2.5}$	particulate matter of 2.5 micrometers or smaller
PM_{10}	particulate matter of 10 micrometers or smaller
POV	privately owned vehicle
ppb	parts per billion
REC	Recognized Environmental Condition
RHC	Raul Hector Castro
ROD	Record of Decision
ROI	Region of Influence
SEIS	Supplemental Environmental Impact Statement
SHPO	State Historic Preservation Officer
SO_2	sulfur dioxide
SR-80	State Route 80
SRL	Soil Remediation Level
µg	micrograms
U.S.	United States
US-191	U.S. Highway 191
U.S.C.	United States Code
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UST	underground storage tank
VOC	volatile organic compounds
WOTUS	waters of the United States
WWTP	Wastewater Treatment Plant

CHAPTER 1 PURPOSE OF AND NEED FOR THE PROJECT

This chapter introduces updates to the United States (U.S.) General Services Administration's (GSA) proposed Raul Hector Castro (RHC) Land Port of Entry (LPOE) Expansion and Modernization Project and describes the purpose and need for agency action and the scope of this Supplemental Environmental Impact Statement (SEIS). This chapter also summarizes the National Environmental Policy Act (NEPA) of 1969 process and relevant regulations, and project background and objectives.

1.1 INTRODUCTION

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 LPOE 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 (POVs), and pedestrians.

GSA completed a *Final Environmental Impact Statement for the Expansion and Modernization of the Raul Hector Castro Land Port of Entry and Proposed Commercial Land Port of Entry in Douglas, Arizona* in April 2024 (GSA 2024a), herein referred to as the 2024 Final Environmental Impact Statement (EIS). GSA signed a Record of Decision (ROD) for the 2024 Final EIS on May 14, 2024. In the ROD, GSA selected the preferred alternative, identified as Alternative 2 (Concurrent Construction – Westward Expansion), herein referred to as the 2024 Final EIS preferred alternative, which would involve construction of a new Commercial LPOE and phased expansion and modernization of the existing RHC LPOE at the same time, with expansion primarily to the west of the existing RHC LPOE. GSA approved sub-alternative 2d (combination of adaptive reuse, relocation, and demolition), identified as the preferred alternative for the management of historic structures at the RHC LPOE (GSA 2024b). As planning for this undertaking has continued, in Section 106 consultation with the SHPO and consulting parties, GSA has identified demolition of the historic Main Building and Garage as the preferred approach to the historic structures at the RHC LPOE. The 2024 Final EIS and GSA's signed ROD can be viewed on the GSA project website at: https://www.gsa.gov/about-us/gsa-regions/region-9-pacific-rim/land-ports-of-entry/raul-hector-castro-land-port-of-entry/environmental-review.

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

GSA has prepared this SEIS for the purpose of analyzing potential environmental impacts from realignment of a segment of the Rose Avenue channel, construction of a new stormwater basin, and replacement and

installation of various utility lines; all of which were identified as necessary components of the RHC LPOE Expansion and Modernization Project after the release of the 2024 Final EIS and May 2024 ROD (GSA 2024a, GSA 2024b). GSA has prepared this SEIS in accordance with NEPA (42 United States Code [U.S.C.] 4321 *et seq.*) as amended by the Fiscal Responsibility Act of 2023 (Public Law 118-5), GSA Order ADM 1095.1F (*Environmental Consideration in Decision Making* [GSA 2000]), the GSA Public Buildings Service's *NEPA Desk Guide* (GSA 1999), and other relevant laws, regulations, and Executive Orders (EOs), including the National Historic Preservation Act (NHPA). This SEIS discloses the environmental impacts that would result from the Proposed Action and No Action Alternative.

SEISs are prepared, published, and filed in the same fashion as a draft or final EIS. Where applicable, this SEIS incorporates by reference information and analysis previously presented in the 2024 Final EIS (available online at the GSA project website provided above) and focuses on new information related to changes in project development and site conditions. Where applicable, this SEIS references and summarizes the relevant sections of the 2024 Final EIS that contain additional relevant information.

Section 1.1 of the 2024 Final EIS provides additional background information on the RHC LPOE and RHC LPOE Expansion and Modernization Project.

1.1.1 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. The city 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.

The RHC LPOE is located at the intersection of 1st Street and Pan American Avenue. 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 the City of Douglas. Adjacent land within the 2024 Final EIS preferred alternative project area includes a small city park, a cluster of small shops, and undeveloped land. Commercial and industrial warehouses exist along the eastern perimeter of the RHC LPOE, along Customs Avenue and 1st Street.

The RHC LPOE is located on approximately 6 acres with facilities owned and managed by GSA and operated by CBP. The project area is located west of the existing RHC LPOE and Pan American Avenue, south of East 3rd Street, north of Border Road and the U.S. – Mexico border, and just west of Chino Road. See Figure 1-1 for a regional figure of the RHC LPOE and proposed project area.

1.2 PURPOSE OF AND NEED FOR THE PROPOSED ACTION

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

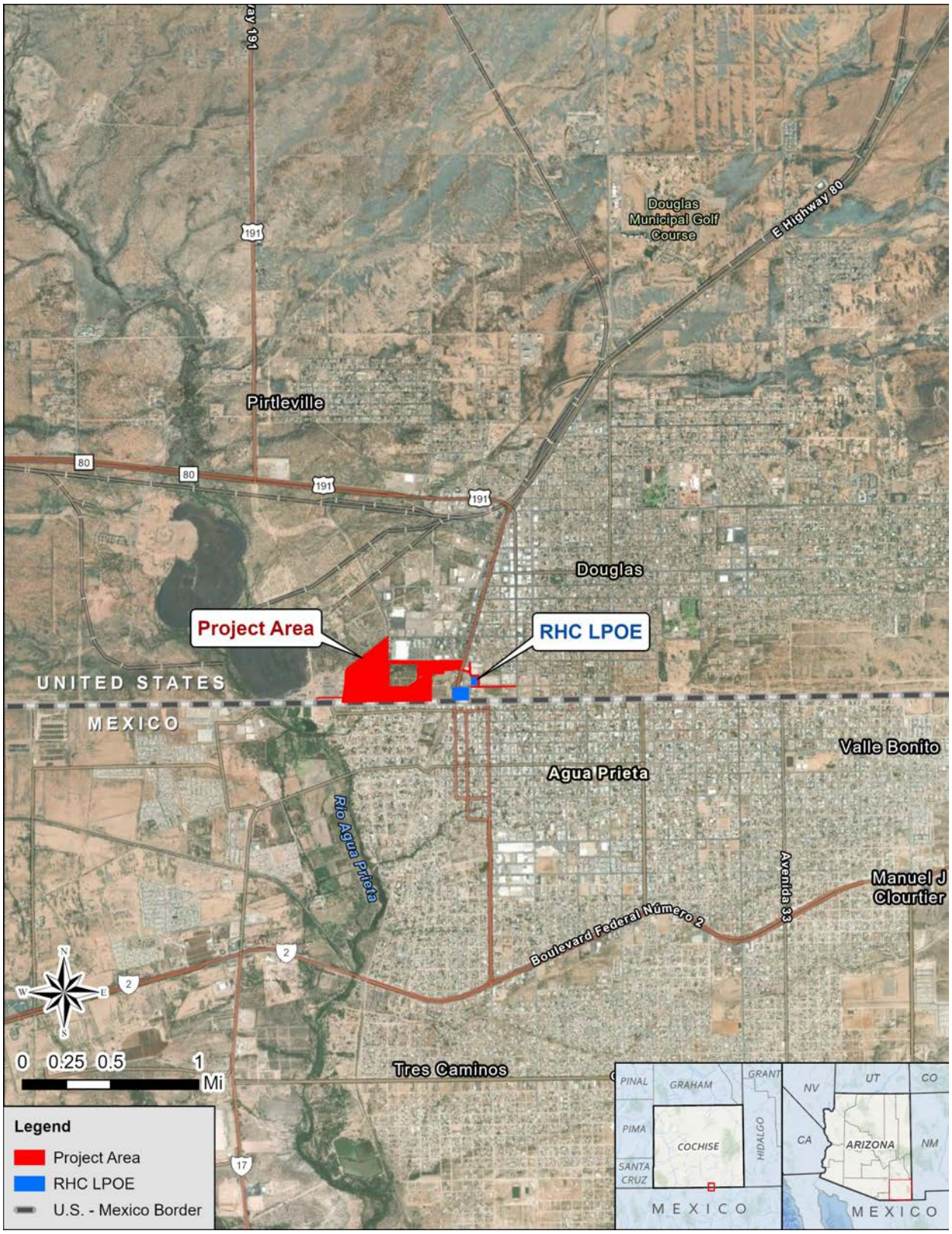


Figure 1-1. Regional Location of the RHC LPOE and Project Area

The purpose of this project considered within this supplemental analysis is to address overall flood control and utility requirements (i.e., stormwater, electrical, sanitary sewer, and fiber optic), as well as improve port operational efficiency for the RHC LPOE Expansion and Modernization Project. The project is needed to avoid engineering conflicts between the current alignment of the Rose Avenue channel with the current proposed layout for the expanded and modernized RHC LPOE; to divert stormwater away from and reduce flooding risks at the RHC LPOE; to provide sufficient stormwater capacity for the expanded and modernized RHC LPOE; and to enhance overall functionality and safety. In addition, the project is needed to meet proposed utility requirements of the expanded and modernized RHC LPOE and bring them in line with current land port design standards and operational requirements. Existing electrical lines are also located within the area proposed for realignment of a segment of the Rose Avenue channel and power the city's Wastewater Treatment Plant (WWTP), located west of the existing RHC LPOE. These lines need to be relocated to maintain electrical service to the WWTP as well as to satisfy CBP design requirements, which prohibit overhead lines within LPOE boundaries.

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 SEIS.

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* [GSA 2000]).

1.3.1 Scoping Phase

1.3.1.1 Notification of Public Scoping

A Notice of Intent (NOI) for the SEIS was published in the *Federal Register* on October 8, 2024, indicating the public scoping period would begin on October 11, 2024. 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 October 11, 16, and 20, 2024 in both English and Spanish language. Announcements were posted on GSA's social media accounts on October 15, 2024. The City of Douglas also posted announcements of the meeting on the city's social media accounts on October 15, 16 and 22, 2024 in English and Spanish. Additionally, GSA mailed scoping letters dated October 11, 2024 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 a SEIS and conduct a scoping meeting; provided a brief description of the project[1]; identified the public scoping meeting time and location; and included instructions on submitting a comment. GSA accepted comments through November 11, 2024.

[1] The need for electrical, sanitary sewer, and fiber optic utility upgrades was identified after the scoping period and during preparation of the Draft SEIS and therefore was not included in any scoping materials.

1.3.1.2 Public Scoping Meeting

A public meeting was held on Thursday, October 24, 2024 from 4:00 p.m. to 6:00 p.m. at the Douglas Visitor Center located at 345 16th Street, Douglas, Arizona, 85607. Approximately 29 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 SEIS. Comments were submitted using comment forms and emails, including letters sent electronically. A total of 6 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 biological resources. GSA received a total of 17 comments.

Table 1-1. Commenters and Comments by Category

Category	Number of Commenters	Number of Comments
Consultation and Coordination	2	3
Land Use	2	2
Biological Resources	2	11
Hazardous Waste and Materials	1	1

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

1.3.2 Agency Consultation

GSA previously conducted consultation as per Section 106 of the NHPA with the Arizona State Historic Preservation Office (SHPO) as part of the RHC LPOE Expansion and Modernization Project as described in Section 1.3.4 of the 2024 Final EIS. GSA will conduct a cultural resources survey to complete the identification of historic properties within the additional project area considered within this SEIS and continue consultation with the SHPO. Updates will be provided in the Final SEIS with results from the survey.

GSA previously conducted informal consultation with the U.S. Fish and Wildlife Service (USFWS) Arizona Ecological Services Field Office as part of the RHC LPOE Expansion and Modernization Project as described in Section 1.3.4 of the 2024 Final EIS. GSA submitted an updated informal consultation letter for the Proposed Action to the USFWS on January 8, 2025 regarding the effects determination to federally protected species under Section 7 of the Endangered Species Act (ESA). The USFWS responded to GSA's informal consultation letter on February 3, 2025 requesting additional information. GSA is in the process of continuing consultation with USFWS for this project. Updates will be provided in the Final SEIS. See Section 3.7, Biological Resources, for additional information on the ESA, the Section 7 process, and potential impacts to biological resources.

Consultation letters with these agencies are included in Appendix B.

1.3.3 Tribal Consultation

GSA is seeking tribal input to help inform the analysis of the project. GSA previously solicited tribal input as part of the RHC LPOE Expansion and Modernization Project as described in Section 1.3.5 of the 2024 Final EIS. Federally recognized tribes were sent letters of notification of intent to prepare a SEIS on October 11, 2024 continuing government-to-government consultation requesting input on this project.

A cultural resources survey will be conducted to complete the identification of historic properties within the project area and updates will be provided in the Final SEIS. Tribes will be updated following completion of the cultural resources survey and associated report. See Section 3.2, Cultural Resources, for details on additional correspondence with tribes and Appendix B for consultation letters with the tribes.

CHAPTER 2 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

Chapter 2 describes the alternatives that were considered, those that are analyzed in this SEIS, and those dismissed by GSA. This chapter also includes a summary of the potential environmental impacts resulting from implementation of these alternatives.

As discussed in Chapter 1, GSA signed a ROD on May 14, 2024 indicating that GSA approved proceeding with the 2024 Final EIS preferred alternative, which would involve construction of a new Commercial LPOE and phased expansion and modernization of the existing RHC LPOE at the same time, with expansion primarily to the west of the existing RHC LPOE (GSA 2024b). Refer to Chapter 2 of the 2024 Final EIS for a detailed description of this alternative.

2.1 PROPOSED ACTION

The Proposed Action is defined as constructing flood control and utility upgrades in support of the RHC LPOE Expansion and Modernization Project. The Proposed Action would include the realignment of a segment of the Rose Avenue channel, construction of a new stormwater basin west of the 2024 Final EIS preferred alternative project area, and replacing and installing various utility lines in the vicinity of the RHC LPOE. The Proposed Action would support and interconnect with design elements from the 2024 Final EIS preferred alternative as described above. The Proposed Action would include site preparation, including demolition of the existing stormwater channel segment (west of the existing site), and a portion of CBC within the 2024 Final EIS preferred alternative project area; potential land acquisition or establishment of applicable land use agreements in the vicinity of the Proposed Action; realignment of a segment of the Rose Avenue channel and associated stormwater channel system components; repair of CBC and road systems impacted by the Proposed Action; and other various utility or ancillary facilities constructed in support of the RHC LPOE Expansion and Modernization Project.

2.2 PROPOSED ALTERNATIVES

As part of the decision-making process, GSA is carrying forward one action alternative (Alternative 1 – Flood Control and Utility Upgrades) and the No Action Alternative for analysis in this SEIS.

2.2.1 Alternative 1 – Flood Control and Utility Upgrades

Under Alternative 1, GSA proposes to construct flood control and utility upgrades in the vicinity of the RHC LPOE that were not included in the 2024 Final EIS (see Figure 2-1). The proposed layout provided in Figure 2-1 represents a preliminary concept site plan for development and is used as a basis for discussion and environmental analysis.

Alternative 1 would consist of the following:

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

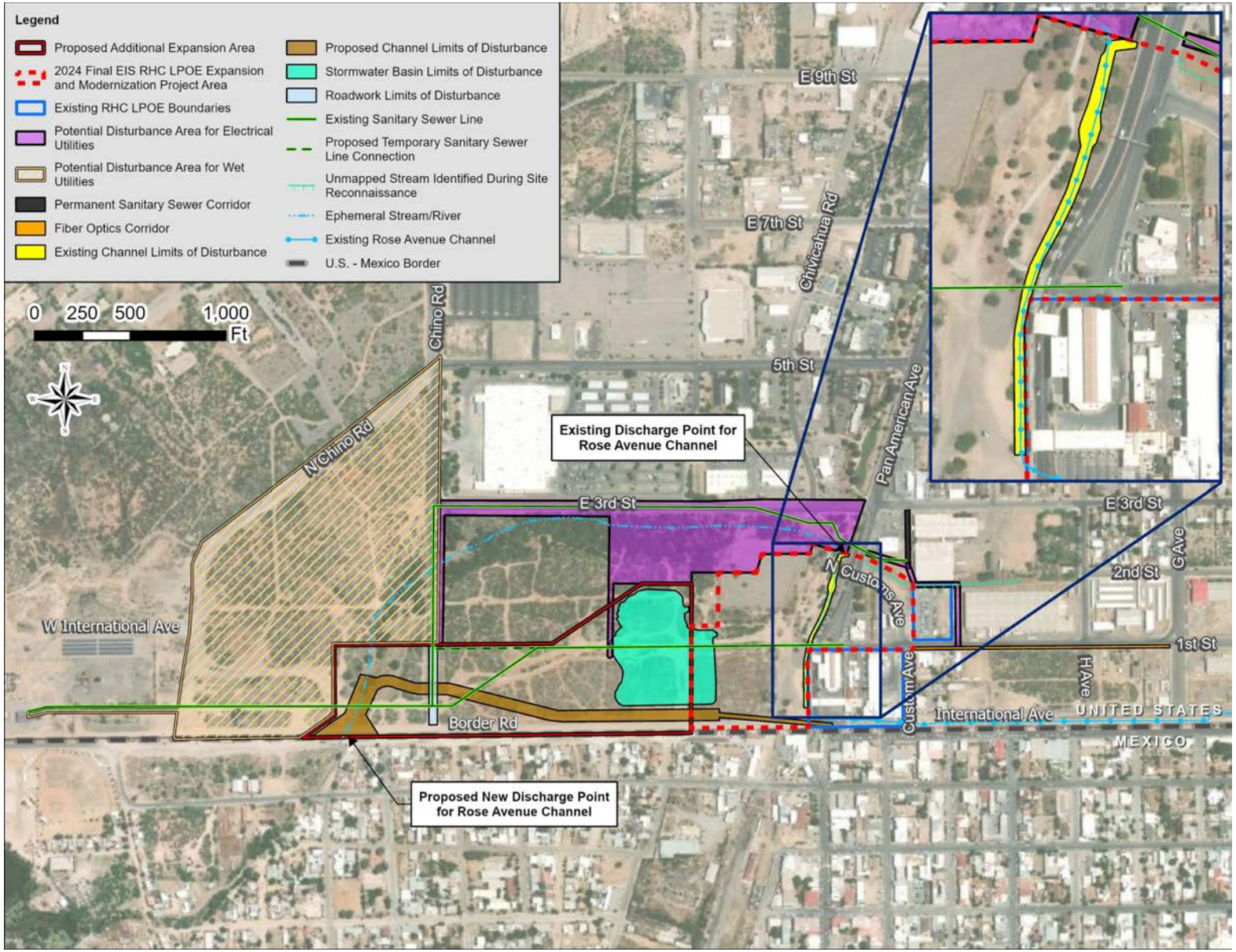


Figure 2-1. Proposed Action Limits of Disturbance

- Evaluate and improve the existing CBC beneath the LPOE. A portion of the existing CBC may be maintained in place.
- Extend the existing CBC to the west and terminate it immediately west of the planned repatriation drop off location at the southern end of the expanded and modernized LPOE. Demolition of existing structures would be limited to only a portion of the existing CBC that needs to be removed.
- Demolish the existing stormwater channel segment that parallels the western side of Pan American Avenue between East 3rd Street and the southern end of the existing RHC LPOE. The upstream end of the existing channel would then be transitioned to the surrounding adjacent grade and rock riprap would be placed on the exposed surface. Alternatively, the existing stormwater channel segment may be reused as conduit or other purposes during the expansion and modernization of the RHC LPOE.
- Install a new CBC where the proposed stormwater channel crosses Chino Road. This would also include repairing the portions of Chino Road that are impacted by improving the CBC in that area, and may require lowering a segment of an existing 8-inch water line that is located in close proximity to this CBC. A portion of Chino Road south of East 3rd Street may have to be partially or completely closed during construction of the CBC.
- As necessary, construct a maintenance road on either the north or south side of the proposed stormwater channel for maintenance access. This could also include a crossing or bridge over the proposed stormwater channel, as well as installation of guard rails as needed.
- Potentially construct security fencing on the north side of the proposed stormwater channel.
- Construct a new approximately 6.2-acre stormwater basin between the RHC LPOE and Chino Road and north of the proposed stormwater channel. The stormwater basin would be designed for temporary water storage with a 36-hour drain time, in compliance with City regulations, rather than a retention basin for permanent water storage.
- Obtain all necessary land and right-of-way permissions as applicable for the realigned stormwater channel segment and new stormwater basin. This could include acquiring, obtaining easements, or obtaining similar land use agreements on portions of land within a proposed additional expansion area totaling approximately 24 acres currently owned by the City of Douglas and a private landowner. This may also include a new right-of-way grant from the Bureau of Land Management (BLM) if any portions of BLM land are required for construction.
- Replace or install approximately 6,500 feet of electrical lines, 4,700 feet of sanitary sewer line, and 1,400 feet of fiber optic lines in the vicinity of the RHC LPOE:
    - West of Pan American Avenue, existing aboveground electrical lines would be removed and re-routed to tie into existing service lines. The exact route of the electrical line west of Pan American Avenue is not known at this time and would be determined during design; however, the alignment would occur within some section of the potential disturbance area for electrical utilities identified in Figure 2-1. Newly installed electrical lines may consist of either aboveground pole-mounted lines, buried lines, or a combination of both. Burial of lines would require trenching. GSA has estimated that less than one acre of land would be disturbed during installation of this segment.
    - West of Pan American Avenue an existing sanitary sewer line would need to be temporarily extended and realigned to Chino Road, south of East 3rd Street so as to maintain service during construction and temporarily avoid conflicts with the realigned Rose Avenue channel segment construction footprint. This would include construction of a new manhole and establishing a new connection to an existing manhole at a sanitary sewer line east of Chino

Road. Permanent sanitary sewer service for the expanded and modernized RHC LPOE is expected to tie into the existing alignment along East 3rd Street near the intersection with Pan American Avenue. At the western terminus of East 3rd Street with the intersection of Chino Road, the sanitary sewer line would need to be extended west towards the WWTP, due to engineering conflicts between the proposed stormwater channel and existing sanitary sewer line along the Chino Road alignment south of East 3rd Street. The exact alignment of the new sanitary sewer connection west of Chino Road is unknown, but would occur somewhere within the potential disturbance area for wet utilities as shown in Figure 2-1, and is expected to temporarily disturb no more than 4.4 acres. In the long term, it is expected that the existing sanitary sewer lateral within the Chino Road alignment south of East 3rd Street, as well as portions of the existing sanitary sewer lines within the project area west of the expanded and modernized RHC LPOE, would be abandoned or removed.

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

Stormwater would still flow through the segment of the unnamed wash from the existing discharge point and proposed new discharge point of the Rose Avenue channel as shown in Figure 2-1 from properties located to the north, northeast, and east; however, the amount of stormwater flowing through the wash in this segment would be reduced due to flow being diverted from the realigned Rose Avenue channel. GSA is in the process of conducting hydrology studies to investigate overall changes in flow through the existing and proposed stormwater channels as well as into the unnamed wash and will provide available updates in the Final SEIS.

The timeframe for agency coordination and construction is tentative and is subject to change. However, for the purpose of this SEIS, design and agency coordination for Alternative 1 is anticipated to take approximately one year to complete, and construction is anticipated to take approximately 6 months in total to complete. Construction of the utility upgrades (i.e., stormwater, electrical, sanitary sewer, and fiber optic) is expected to occur during the construction of the RHC LPOE Expansion and Modernization Project as considered in the 2024 Final EIS. Construction of the realigned Rose Avenue channel segment is expected to occur prior to construction of the RHC LPOE Expansion and Modernization Project as considered in the 2024 Final EIS. During construction of the realigned Rose Avenue channel segment, it is estimated there could be approximately 20 worker vehicles, 20 delivery vehicles for construction supplies, and 10 haul trucks per day to the project area for deliveries and waste removal. The number of workers and vehicle trips for construction of utility upgrades would be consistent with levels evaluated in the 2024 Final EIS. All construction and demolition waste would be disposed of and recycled at authorized facilities. GSA would implement appropriate traffic control measures and install signage on local roadways during construction to manage construction vehicle traffic.

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

2.2.2 No Action Alternative

The No Action Alternative is included and analyzed to provide a baseline for comparison with impacts from the Proposed Action (Section 102(C)(iii) of NEPA [42 U.S.C. § 4332]). The No Action Alternative assumes that GSA would not demolish portions of the existing stormwater channel; would not realign a segment of the Rose Avenue channel; would not construct a new stormwater basin; and would not replace or install electrical, sanitary sewer, fiber optic utilities, or any other associated supporting facilities. In addition, no acquisition or establishment of land use agreements would occur on parcels of land proposed for the project.

In general, this alternative would not meet the purpose and need for the Proposed Action, as identified in Chapter 1. Under the No Action Alternative, the RHC LPOE Expansion and Modernization Project would be constructed as described in the 2024 Final EIS. The overall stormwater management and flood control needs for the expanded and modernized RHC LPOE would not be addressed; stormwater flow would not be diverted; electrical, sanitary sewer, and fiber optic requirements would not be met; and engineering conflicts between the current alignment of the Rose Avenue channel and the RHC LPOE Expansion and Modernization Project layout would remain. As a result, the No Action Alternative would increase flood potential at the expanded and modernized RHC LPOE and surrounding area, increasing risks that the RHC LPOE could be partially shutdown or impacted during a storm event, impeding the LPOE's functionality, and jeopardizing the security and safety at the RHC LPOE. In addition, the utility requirements for the expanded and modernized RHC LPOE would not be met, lessening the port's operational efficiency and its ability to support the CBP mission.

Although the No Action Alternative does not meet the purpose and need for the project, this alternative is carried forward to provide a baseline for comparison of effects from implementing Alternative 1.

2.3 ALTERNATIVES CONSIDERED AND DISMISSED FROM DETAILED ANALYSIS

2.3.1 Rose Avenue Channel – East Alignment

GSA considered realigning the Rose Avenue channel using an eastern alignment in the vicinity of the RHC LPOE in anticipation of future improvements to the existing RHC LPOE. The eastern alignment would start by connecting to the existing Rose Avenue channel near International Avenue, east of the existing RHC LPOE; proceeding north curving along North Customs Avenue; and terminating at an existing CBC on the eastern side of Pan American Avenue to go under the road allowing the water to flow into an unnamed wash. This alternative also considered improvements to the CBCs from International Avenue to the existing intersection of Customs Avenue and 1st Street as well at the CBC at Pan American Avenue. The proposed channel would have consisted of an open channel and would be concrete-lined along the entire route. This alternative was dismissed from detailed analysis because of the additional engineering and costs required to move stormwater to the north around the RHC LPOE prior to it flowing into the unnamed wash, physical conflicts with facilities within the expanded and modernized RHC LPOE, changes of traffic patterns required on Customs Avenue from a standard two-way street to a one-way street, and concerns over increased flow and water surface elevation at upstream areas where the existing channel crosses under Pan American Avenue. Further, the realigned stormwater channel segment would be substantially closer to adjacent structures located to the east of the RHC LPOE compared to the south alignment.

2.4 COMPARISON OF ALTERNATIVES

Table 2-1 provides a comparison of the potential environmental impacts resulting from the alternatives considered within this SEIS. Potential impacts are summarized for each resource area affected by the alternatives. Chapter 3 of this SEIS contains a detailed discussion of these potential impacts by resource area.

Table 2-1. Summary Comparison of Alternatives

Alternative 1 – Flood Control and Utility Upgrades	No Action Alternative
Cultural Resources	
Construction: Proposed construction activities would result in ground disturbance within the expanded project area, which is mostly vacant and undeveloped with portions located in existing rights-of-way. The undertaking has already been determined to have adverse effects under NHPA due to the proposed demolition of historic properties, but additional adverse effects and direct, significant, adverse impacts under NEPA to cultural resources could occur during construction if archeological resources are encountered during construction. GSA is continuing consultation with the SHPO and consulting parties under Section 106 of the NHPA. GSA will conduct a cultural resources survey to complete the identification of historic properties within the project area and provide updates in the Final SEIS. **Operation**: No adverse effects under NHPA and less-than-significant impacts under NEPA to cultural resources would be expected during operations.	Adverse effects to historic properties under NHPA associated with the undertaking would be limited to the previously defined APE in the 2024 Final EIS.
Impact Reduction Measures: Prior to construction, GSA would implement the following measures: • Develop an archeological monitoring plan in consultation with SHPO, ACHP, federally recognized Indian tribes, and other consulting parties to reduce impacts from ground-disturbing activities. • Identify and develop appropriate measures to avoid, minimize or mitigate adverse effects on historic properties in consultation with the SHPO and other applicable consulting parties.	
Air Quality	
Construction: Short-term, minor, adverse, direct and indirect impacts on regional air quality due to dust and emissions from construction equipment and vehicles. Emissions would not exceed *de minimis* thresholds for any criteria pollutants. **Operation**: Long-term, negligible, adverse, and indirect impacts.	Impacts on air quality would be limited to those described in the 2024 Final EIS. No other impacts on air quality would be expected.
Impact Reduction Measures: Air quality impact reduction measures for the 2024 Final EIS preferred alternative were adopted in the May 2024 ROD and are incorporated herein by reference. In addition, GSA would take the following additional steps to minimize emissions: • Use cement blended with the maximum feasible amount of fly ash or other materials that reduce emissions from cement production. • Recycle construction debris to the maximum extent feasible. • Consider using locally sourced materials to reduce transportation emissions.	
Land Use	
Construction: Short-term, minor, adverse, and direct impacts from changes in land use designations that would occur prior to construction. Direct or indirect adverse impacts on adjacent landowners are not anticipated. **Operation**: Permanent, minor to moderate, beneficial, and direct and indirect impacts due to improvement of undeveloped, underutilized space for flood control and utility needs in the vicinity of the project. In addition, maintenance of the stormwater channel, new stormwater basin, and other proposed utility upgrades	Impacts on land use would be limited to those described in the 2024 Final EIS. No other impacts to land use would be expected.

Alternative 1 – Flood Control and Utility Upgrades	No Action Alternative
would be required to ensure their continued effectiveness. Direct or indirect adverse impacts on adjacent landowners are not anticipated.	
Impact Reduction Measures: Consideration of local zoning laws and all design requirements of state and local governments to the extent practicable. Additionally, GSA would continue coordination efforts with stakeholders.	
Geology and Soils	
Construction: Short-term, minor, adverse, and direct impacts on geology; long-term, minor, adverse, and direct impacts on topography; and permanent, minor, adverse, and direct impacts on soil due to ground disturbing activities and reshaping sloped terrain. Construction would disturb up to approximately 33.2 acres of both previously disturbed and undisturbed soils. **Operation**: No impacts to geology or topography. Long-term, minor, beneficial, and indirect impacts on soils due to improved stormwater flow and drainage, reducing soil erosion compared to existing conditions.	Impacts to geology and soils would occur from construction and operations of the 2024 Final EIS preferred alternative. No other direct disturbances to geology, topography, or soils would be expected; however, long-term, moderate, adverse, and indirect impacts to soils in the surrounding area could result, as the expanded and modernized RHC LPOE would lack adequate stormwater management facilities if the new stormwater basin is not constructed, resulting in increased offsite erosion.
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 the design and the Arizona Stormwater CGP.	
Water Resources	
Construction: No impacts to groundwater. Short-term, negligible, adverse, and direct impacts on regional water supply due to increased water use during construction activities. Short-term, minor, adverse, and indirect impacts to downstream surface waters due to increased potential for sedimentation and contamination. Long-term, minor, beneficial, direct and indirect impacts to floodplains due to improved flood controls. GSA will survey the project area to determine impacts to wetlands and waters of the U.S. and provide updates in the Final SEIS. **Operation**: Long-term, minor, beneficial, and direct impacts to surface waters as a result of altered hydrology due to diversion of stormwater flows, as well as long-term, moderate, beneficial, and indirect impacts due to improved stormwater management within and near the project area. Flooding potential would also be reduced. No additional subsurface disturbance would be required, other than for occasional repair and maintenance, resulting in negligible adverse impacts.	Impacts to water resources would occur from construction and operations of the 2024 Final EIS preferred alternative. No other direct impacts to groundwater or wetlands. Long-term, moderate, adverse, and indirect impacts to water resources as the overall stormwater management and flood control needs for the expanded and modernized RHC LPOE would not be addressed. Flood potential could increase onsite and in the surrounding area.
Impact Reduction Measures: Water resources impact reduction measures for the 2024 Final EIS preferred alternative were adopted in the May 2024 ROD and are incorporated herein by reference. In addition, GSA would consider incorporating bioswales or permeable pavements in the project design where applicable to enhance stormwater management capabilities.	
Biological Resources	
Construction: Permanent, moderate, adverse, and direct impacts to biological resources due to ground disturbance and vegetation removal, potentially altering the existing ecological community and contributing to minor habitat fragmentation from permanent habitat removal. Short-term, moderate, adverse, and indirect impacts to wildlife due to increased human activity,	Impacts to biological resources would occur from construction and operations of the 2024 Final EIS preferred alternative. No other direct disturbance to biological resources would occur; however, ongoing flooding would have the potential to cause periodic disturbances to vegetation and habitat, resulting in long-

Alternative 1 – Flood Control and Utility Upgrades	No Action Alternative
fugitive dust, and noise. Proposed Action may effect, but is not likely to adversely affect special status species, including federally endangered or threatened species. GSA previously consulted with USFWS per Section 7 of the ESA as part of the 2024 Final EIS and is continuing consultation as part of this Proposed Action (see Appendix B). **Operation**: Long-term, minor, adverse, and indirect impacts to wildlife habitat due to altered hydrology and diversion of water flows.	term, intermittent, minor to moderate, adverse direct impacts.
Impact Reduction Measures: Biological resources impact reduction measures for the 2024 Final EIS preferred alternative were adopted in the May 2024 ROD and are incorporated herein by reference. Additionally, GSA would implement the following measures: • An occupancy survey would be conducted to determine if any western burrowing owls are present within the project area in accordance with the Burrowing Owl Project Clearance Guidance for Landowners (AZGFD 2009). The survey would be conducted by a surveyor who is certified by AZGFD or has similar training and qualifications. If an active burrowing owl burrow is detected, GSA would contact AZGFD and USFWS for further direction. • To the extent practicable, vegetation clearing or trimming would be avoided in the project area during the migratory bird nesting season (generally between January and June). If clearing or trimming is required during the nesting season, surveys would be conducted by a qualified biologist to determine if any nesting birds occur in the project area prior to removal or trimming of vegetation. If nesting birds are present, removal or trimming of the vegetation would be delayed until after nesting season, or GSA would coordinate with the USFWS for additional technical assistance in complying with the MBTA. • To the extent practicable, the amount of time any open trench or large hole is left open would be minimized. When trenches or large holes cannot be backfilled immediately, escape ramps (e.g., short lateral trenches or wooden planks sloping to the surface) would be installed in each hole and at least every 295 feet (90 meters) in a trench. Slopes would be less than 45 degrees and trenches and holes that have been left open would be inspected to remove any wildlife prior to backfilling. • Pre-construction presence/absence surveys for any bald or golden eagles would be completed to determine if there is a need to remove potentially suitable habitat within the project area. Surveys would be conducted pursuant to local USFWS field office requirements. The need for any restrictions around tree clearing, if any, would be determined in coordination with applicable federal resource agencies pending survey results. If the project is determined to have potential to disturb or kill bald or golden eagles, GSA would obtain a permit under the BGEPA. • Use drought-resistant native vegetation for landscaping around the new stormwater basin.	
Infrastructure and Utilities	
Construction: Short-term, minor, adverse, and direct impacts on roadway infrastructure; short-term, minor, adverse, and indirect impacts to utilities within the project area due to an increased potential for intermittent interruptions in service; and short-term, negligible, adverse, and indirect impacts on water demand and wastewater services. **Operation**: No impacts to infrastructure are anticipated. Permanent, moderate, beneficial, and direct impacts on stormwater management facilities, as the upgraded system would optimize stormwater flow and drainage in the project area. Permanent, minor, beneficial, and direct impacts on sewer utilities as a result of upgraded sewer system capacity. Permanent, moderate, beneficial, and direct impacts to electrical infrastructure through replacement or installation of approximately 6,500 feet of electrical lines. Maintenance of the proposed stormwater channel segment, new stormwater	Impacts to infrastructure and utilities would occur from construction and operations of the 2024 Final EIS preferred alternative. In addition, long-term, moderate, adverse, and indirect impacts would result, as the overall stormwater management and flood control needs for the RHC LPOE would not be addressed. Additional strain would be placed on the existing and surrounding utilities. Without upgrades to electrical, sanitary sewer, and fiber optic utilities, the RHC LPOE Expansion and Modernization Project would not have sufficient utility capacity or necessary utility requirements to achieve compliance with CBP design requirements, lessening the port's operational efficiency and its ability to support the CBP mission.

<table>
<tr><th>Alternative 1 – Flood Control and Utility Upgrades</th><th>No Action Alternative</th></tr>
<tr><td>basin, and other proposed utility upgrades would be required to ensure their continued effectiveness.</td><td></td></tr>
<tr><td colspan="2">Impact Reduction Measures:
Prioritizing native plant species when introducing new vegetation. This could include using native, drought-resistant vegetation around the new stormwater basin to reduce maintenance needs and enhance water conservation.
To avoid or limit the potential for utility service interruptions, existing utility maps would be reviewed, and utility companies would be contacted in advance of construction to identify any locations where utility lines could be affected.
Implement a maintenance plan that includes regular inspections and cleaning of the stormwater management facilities to ensure its continued effectiveness.</td></tr>
<tr><th colspan="2">Human Health and Safety</th></tr>
<tr><td><u>Construction</u>: Short-term, negligible to minor, adverse, and direct impacts comparable to those described in the 2024 Final EIS, which is incorporated herein by reference. Additionally, short-term, negligible, adverse impacts related to hazardous materials and waste handling could occur.

<u>Operation</u>: Long-term, minor, beneficial, and direct impacts resulting from reduced flood risk. Design would also address scoping comments raised regarding the potential for drownings during major storm events (i.e., through the use of gradual slopes and safety barriers, as applicable). Negligible adverse impacts related to hazardous materials and waste handling.</td><td>Impacts to human health and safety would occur from construction and operations of the 2024 Final EIS preferred. In addition, long-term, moderate, adverse, and indirect impacts due to increased flood potential at the expanded and modernized RHC LPOE and surrounding area.</td></tr>
<tr><td colspan="2">Impact Reduction Measures: Human health and safety impact reduction measures for the 2024 Final EIS preferred alternative were adopted in the May 2024 ROD and are incorporated herein by reference. GSA would take the following additional steps to reduce impacts:
Safety measures would be implemented around the stormwater basin, such as proper signage, safety barriers, and gradual slopes to minimize drowning risks. Fencing on the north side of the proposed stormwater channel may be considered pending final design.
Regular inspections and maintenance of the stormwater management facilities would be conducted to ensure its continued safe operation and structural integrity.
During removal and replacement of electrical lines, appropriate safety protocols, including de-energizing lines as applicable, ensuring proper grounding, and using protective barriers, would be implemented to prevent electrical hazards.
Trenching safety measures such as shoring, trench boxes, and worker safety training would be implemented as applicable to minimize risks associated with excavation and confined space entry.
As necessary, the need for further due diligence would be considered within potential disturbance area for utilities as shown in Figure 2-1 prior to construction. This could include ground penetrating radar within the potential disturbance area for wet utilities west of Chino Road prior to construction to investigate for presence of subsurface objects associated with the former PD Smelter Site.
Construction workers, including utility providers, working in any potential disturbance areas for utilities would wear appropriate personal protective equipment during construction as necessary to avoid impacts from potentially contaminated soils, and would characterize any soils that are to be disposed of offsite to determine appropriate management and disposal requirements in accordance with federal, state, and local regulations.</td></tr>
</table>

ACHP = Advisory Council on Historic Preservation; APE = Area of Potential Effect; AZGFD = Arizona Game and Fish Department; BGEPA = Bald and Golden Eagle Protection Act; CBP = U.S. Customs and Border Protection; CGP = Construction General Permit; EIS = Environmental Impact Statement; ESA = Endangered Species Act; GSA = U.S. General Services Administration; LPOE = Land Port of Entry; MBTA = Migratory Bird Treaty Act; NEPA = National Environmental Policy Act; NHPA = National Historic Preservation Act; RHC = Raul Hector Castro; ROD = Record of Decision; SHPO = State Historic Preservation Officer; USFWS = United States Fish and Wildlife Service; UST = underground storage tank; VOC = volatile organic compound

CHAPTER 3 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

Chapter 3 describes the existing environmental conditions within the region of influence (ROI) of the Proposed Action. This chapter also identifies the potential environmental consequences of the Proposed Action, including Alternative 1 and the No Action Alternative, as detailed in Chapter 2. Resource areas analyzed in detail within this SEIS include: cultural resources, air quality, land use, geology and soils, water resources, biological resources, infrastructure and utilities, and human health and safety.

3.1 METHODOLOGIES

3.1.1 Affected Environment Methodology

The affected environment summarizes the current environment of the area within the ROI of the Proposed Action. 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 No Action Alternative (i.e., site-specific versus regional baseline conditions). For example, the geographic area of analysis for some environmental resources extends beyond the proposed limits of disturbance to encompass a city- or county-level analysis (e.g., air quality); however, the ROI for the majority of the resource areas in this SEIS are generally contained within the footprint of the project boundaries (e.g., geology and soils).

As discussed in Section 1.1, this SEIS incorporates by reference information contained in the 2024 Final EIS (available online at the GSA project website provided in Chapter 1). The affected environment and environmental consequences discussed in this SEIS will only discuss areas which differ from those described and analyzed in the 2024 Final EIS. This SEIS will also identify which sections in the 2024 Final EIS are applicable to this SEIS and makes reference to the exact section in the 2024 Final EIS, where applicable.

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 generally used interchangeably in this chapter, unless otherwise noted. According to the GSA Public Buildings Service’s *NEPA Desk Guide*, direct and indirect effects are defined as:

- **Direct effects –** Effects, which are caused by the action and occur at the same time and place. In other words, direct impacts are those that are caused directly and immediately from project-related activities, such as excavation of land to realign a segment of the Rose Avenue channel and construct a new stormwater basin that could cause soil erosion. Most direct effects are confined to the project area, but some may extend beyond the project boundary.
- **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. 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 SEIS, 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

Magnitude	
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.
Duration	
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.

3.1.3 Resources Dismissed from Further Consideration

Section 107(e)(1) of NEPA [42 U.S.C. § 4336a] specifies that page limits for EISs shall not exceed 150 pages, not including any citations or appendices. As such, this SEIS focuses on those resources and conditions potentially subject to effects from implementation of the Proposed Action.

The following subsections identify and describe the resources that GSA determined would either not be affected or would sustain negligible impacts from the Proposed Action and would not require further evaluation. The resource areas dismissed from further analysis are visual resources, recreation, traffic and transportation, noise, and socioeconomics.

3.1.3.1 Visual Resources

Section 3.4 of the 2024 Final EIS discusses the existing environment, potential environmental consequences, and impact reduction measures related to visual resources from construction and operations of the RHC LPOE Expansion and Modernization Project, which partially overlaps with and would occur directly adjacent to the Proposed Action. 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. There are no identified protected landscapes or features within the proposed limits of disturbance or within viewshed (0.25 miles) of these areas under the Proposed Action. In addition, the Proposed Action would not introduce new structures to the visual landscape that would result in a major alteration to the aesthetic character and use of the land in relation to surrounding uses or degrade the overall visual appeal of the area. Therefore, visual resources has been dismissed from further consideration in this SEIS.

3.1.3.2 Recreation

Section 3.4 of the 2024 Final EIS discusses the existing environment, potential environmental consequences, and impact reduction measures related to recreation from construction and operations of the RHC LPOE Expansion and Modernization Project, which partially overlaps with and would occur directly adjacent to the Proposed Action. The closest recreational areas to the project area include the Paseo de las Americas Linear Park and Speer Park. A small segment of the Paseo de las Americas Linear Park is located within and immediately adjacent to the proposed disturbance area for electrical utilities along East 3rd Street. The majority of the park south of East 3rd Street is located within the 2024 Final EIS preferred alternative footprint and will be removed as part of the RHC LPOE Expansion and Modernization Project as discussed within the 2024 Final EIS. The small section of the park outside of the 2024 Final EIS preferred alternative footprint and south of the East 3rd Street may experience partial or full closure during construction of utilities, although the duration of construction is expected to be brief (e.g., lasting a few days or weeks) and full access would be restored following construction. Use of the park is primarily to facilitate pedestrian and bicycle access to the RHC LPOE; as construction of the utility upgrades would be occurring concurrently with the RHC LPOE Expansion and Modernization Project, use of this section of the park is expected to be low during construction as access to the RHC LPOE would be temporarily re-routed. Speer Park ranges from approximately 300 to 700 feet from the proposed electrical, fiber optic, and sanitary sewer utility project areas. Access to this park would not be affected during construction or operation of the Proposed Action. Therefore, recreation has been dismissed from further consideration in this SEIS.

3.1.3.3 Transportation and Traffic

Section 3.8 of the 2024 Final EIS discusses the existing environment, potential environmental consequences, and impact reduction measures related to transportation and traffic from construction and operations of the RHC LPOE Expansion and Modernization Project, which partially overlaps with and would occur directly adjacent to the Proposed Action. Traffic in the western portion of the Proposed Action is mostly limited to CBP staff patrolling and monitoring operations along Border Road and Chino Road. The public does not generally use the section of Chino Road that crosses the western portion of the project area and existing signage is in place directing vehicles away from this roadway. Most of the western portion of the Proposed Action would be located north of Border Road and construction or operation is only expected to temporarily impact this roadway, as access must be maintained for CBP operations. During replacement and installation of the electrical, sanitary sewer, and fiber optic utility lines, GSA would conduct all construction work primarily within existing or newly established rights-of-ways located adjacent to Chino Road, North Chino Road, East 3rd Street, Pan American Avenue, Customs Avenue, 1st Street, and the southern WWTP access road. Construction activities associated with the Proposed Action may require temporary closure or lane restrictions along segments of these transportation networks during construction; however, this would only result in short-term, negligible impacts to transportation in the

project area. GSA would coordinate with CBP, the City of Douglas, and commercial businesses adjacent to proposed construction activities regarding these road closures and lane restrictions. In addition, alternative routes are available in the area that allow access to local businesses located adjacent to the project area. GSA would meet all traffic safety requirements and would install applicable road signage and barriers as needed during construction activities. GSA may also limit public access to portions of Chino Road during construction. Following construction, rights-of-ways and any damage to paved roadways and parking areas would be repaired to existing conditions. Therefore, transportation and traffic have been dismissed from further consideration in this SEIS.

3.1.3.4 Noise

Section 3.9 of the 2024 Final EIS discusses the existing environment, potential environmental consequences, and impact reduction measures related to noise from construction and operation of the RHC LPOE Expansion and Modernization Project, which partially overlaps with and would occur directly adjacent to the Proposed Action. Construction noise from the Proposed Action would be temporary and within levels that were estimated in the 2024 Final EIS. Multiple commercial businesses are located adjacent to the proposed utility upgrade project areas. In addition, residences are located along 1st Street, directly adjacent to the limits of disturbance for fiber optic utility construction, as well as along 2nd Street approximately 300 feet to the north. Impacts to these receptors would be substantially the same as described in Section 3.9.2.4 of the 2024 Final EIS, as the RHC LPOE Expansion and Modernization Project would be occurring concurrently and directly adjacent to the utility upgrades. Noise from operational activities associated with the Proposed Action such as maintenance and monitoring of the realigned Rose Avenue channel segment, new stormwater basin, and utility lines are anticipated to be short-term and negligible. In addition, GSA would follow all noise impact reduction measures specified in Section 3.9.2.6 of the 2024 Final EIS. Therefore, noise has been dismissed from further consideration in this SEIS.

3.1.3.5 Socioeconomics

Section 3.11 of the 2024 Final EIS discusses the existing environment, potential environmental consequences, and impact reduction measures related to socioeconomics from construction and operation of the RHC LPOE Expansion and Modernization Project, which partially overlaps with and would occur directly adjacent to the Proposed Action. The Proposed Action's limits of disturbance do not contain any residences or commercial businesses; however, some of the utility work would be located adjacent to commercial businesses and residences. The ROI for the Proposed Action would fall within the ROI for socioeconomics considered in the 2024 Final EIS (i.e., Cochise County, with an emphasis on the City of Douglas), and the Proposed Action is not anticipated to impact population, housing, labor or earnings within the City of Douglas or greater Cochise County beyond what was analyzed in the 2024 Final EIS. Therefore, socioeconomics has been dismissed from further consideration in this SEIS.

3.1.3.6 Protection of Children's Health and Safety

Section 3.12 of the 2024 Final EIS discusses the existing environment, potential environmental consequences, and impact reduction measures related to protection of children's health and safety from construction and operation of the RHC LPOE Expansion and Modernization Project, which partially overlaps with and would occur directly adjacent to the Proposed Action. Residences are located along 1st Street, directly adjacent to the limits of disturbance for fiber optic utility construction, as well as along 2nd Street approximately 300 feet to the north. The ROI for the Proposed Action would fall within the ROI for protection of children's health and safety considered in the 2024 Final EIS (i.e., 2 miles from the RHC LPOE); and the Proposed Action is not anticipated to impact youth populations beyond what was analyzed in the 2024 Final EIS. Specifically, impacts to youth populations near the project area would be substantially the same as described in Section 3.12.2.4 of the 2024 Final EIS, as the RHC LPOE Expansion and Modernization Project would be occurring concurrently and directly adjacent to the utility upgrades. Therefore, protection of children's health and safety has been dismissed from further consideration in this SEIS.

3.2 CULTURAL RESOURCES

This section describes the baseline conditions for cultural resources at or near the project area and assesses historic and archeological resources within the project area to affect, or be affected by, implementing the Proposed Action, including Alternative 1 and the No Action Alternative, as discussed in Chapter 2. This SEIS 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 National Register of Historic Places (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 or tribal cultural heritage resources 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 archeological sites, historic archeological 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 cause alterations in the character or use of historic properties if such properties exist. 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 archeological resources are generally the result of impacts from ground-disturbing activities. The APE for such resources therefore coincides with those areas where impacts from the construction and operation of a proposed facility would occur (i.e., the project area). Adverse effects to architectural resources may occur through 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 or tribal cultural heritage resources may be subject to both direct and indirect impacts. As such, the APE could also include areas outside of the project area. In this case, the APE does not include any areas outside of the project area, as there are no identified historic properties adjacent to the project area.

The APE for the 2024 Final EIS is defined in Section 3.2.1.1 of that EIS as proposed site boundaries for the Commercial LPOE and RHC LPOE Expansion and Modernization Project alternatives and expansion areas. As discussed in Section 1.3.4, Section 106 consultation is underway for the undertaking (i.e., the Proposed Action) as analyzed in the 2024 Final EIS. Consultation is being updated to include an expanded version of the APE, to include the additional project area considered within this SEIS and as shown in Figure 2-1. The APE already includes the area of the proposed demolition of the existing stormwater channel segment that parallels the western side of Pan American Avenue between East 3rd Street and the southern end of the existing RHC LPOE, a portion of the area proposed for realignment of a segment of the Rose Avenue channel, and a portion of the new stormwater basin. The expanded APE includes

approximately 54.18 acres of additional land, located both to the east and west of the RHC LPOE Expansion and Modernization Project Area (see Figure 2-1).

3.2.1.2 Regulatory Setting and Requirements

Section 3.2.1.2 of the 2024 Final EIS discusses the regulatory setting and requirements that apply to the Proposed Action, and is incorporated herein by reference. This includes the description of NEPA, NHPA, NRHP, Section 106 consultation, the Archaeological Resources Protection Act of 1974, the Archaeological Resources Protection Act of 1979, and the Native American Graves Protection and Repatriation Act of 1990.

3.2.1.3 Existing Conditions

As described in Section 3.2.1.3 of the 2024 Final EIS, GSA conducted cultural resources studies to identify prehistoric and historic resources within the 2024 Final EIS APE. This included records searches and field surveys of the APE. GSA assessed the findings from the studies to determine the effects to cultural resources and consulted with the Arizona SHPO, Advisory Council on Historic Preservation (ACHP), federally recognized Indian tribes, and other consulting parties. The NHPA Section 106 consultation is ongoing. Details regarding the studies and consultation (ongoing and completed) are discussed in Section 3.2 and Appendix B of the 2024 Final EIS, and summarized in Section 3.2.2.2 below.

In compliance with Section 106 of the NHPA, GSA will conduct a cultural resources survey to identify historic properties within the Proposed Action's expanded APE and will provide an update in the Final SEIS with results from the survey. No known structures or sites are located within the expanded APE for the undertaking. The expanded APE is also known to be previously disturbed from historical use and ongoing activities (i.e., CBP patrols). This property also contains existing utilities, roadways and unpaved trails, as well as construction debris piles and other discarded waste.

To date, federally recognized Indian tribes have not identified any tribal cultural heritage resources within the expanded APE. As described in Section 3.2.1.3 of the 2024 Final EIS, GSA previously distributed letters to eight federally recognized Indian tribes that may have a cultural or traditional affiliation on land within this property in compliance with NHPA requirements. As part of the SEIS, GSA sent letters of notification of intent to prepare a SEISs to these tribes on October 11, 2024 providing them project updates. One response was received from the White Mountain Apache Tribe Historic Preservation Office on October 17, 2024, which stated that the proposed project would have no adverse effect to the tribe's cultural heritage resources, and further consultation for the proposed project is not necessary.

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 (see Section 3.1, Methodologies).

Per NHPA and 36 Code of Federal Regulations (CFR) 800 of its implementing regulations, adverse effects to historic properties occur when an undertaking may alter 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" in Sections 3.2.2.2 through 3.2.2.4 refer to effects under NEPA; references to "effects" refer to effects under the NHPA.

3.2.2.2 Section 106 Consultation

Past consultation efforts for the undertaking conducted as part of the 2024 Final EIS are summarized in Section 3.2.2.2 of that EIS as well as in the May 2024 ROD. To date, SHPO has concurred with GSA's determinations for eligibility for historic resources within the 2024 Final EIS preferred alternative project area. Specifically, SHPO concurred with GSA's determination that the Pan American and Customs Avenues Public Park Bathroom Building, the Cattle Operation Building, and the isolated archaeological finds identified during the cultural resource surveys are ineligible for inclusion in the NRHP. GSA has committed to implementing an archaeological monitoring plan in consultation with SHPO and federally recognized Indian tribes. If unanticipated discoveries are encountered during ground-disturbing activities, such as excavating and grading, all earth-moving activity within and around the immediate discovery area would be avoided until a qualified archaeologist can assess the nature and significance of the find. GSA is continuing consultation with the SHPO and consulting parties under Section 106 of the NHPA. GSA notified SHPO and consulting parties of the expanded APE on November 8, 2024 and held a consulting parties meeting at RHC LPOE on November 15, 2024 that identified demolition of the historic Main Building and Garage as the preferred approach to the historic structures at the RHC LPOE. SHPO concurred with the expanded APE on December 6, 2024. GSA provided additional updates on the expanded APE on January 7, 2025. GSA will continue the consultation with SHPO and the consulting parties, complete the identification of historic properties on the new land acquisition to the west, and formally make an adverse effect determination with the revised cultural resources report for the undertaking. Updates to the Section 106 consultation process, as well as any potential applicable mitigation measures if identified, will be included in the Final SEIS. Appendix B of this SEIS includes applicable consultation letters provided since the completion of the 2024 Final EIS; Appendix B of the 2024 Final EIS includes all consultation letters provided through April 2024.

3.2.2.3 No Action Alternative

Under the No Action Alternative, the RHC LPOE Expansion and Modernization Project would be constructed as described in the 2024 Final EIS. However, GSA would not demolish portions of the existing stormwater channel; would not realign a segment of the Rose Avenue channel; would not construct a new stormwater basin; and would not replace or install electrical, sanitary sewer, fiber optic utilities, or any

other associated supporting facilities. In addition, no acquisition or establishment of land use agreements would occur on parcels of land proposed for the project. Therefore, the adverse effects to historic properties under NHPA associated with the undertaking would be limited to the previously defined APE in the 2024 Final EIS.

3.2.2.4 Alternative 1 – Flood Control and Utility Upgrades

Construction

Under Alternative 1, proposed construction activities would result in ground disturbance within the expanded project area, which is mostly vacant and undeveloped with portions located in existing rights-of-way. GSA will conduct a cultural resources survey to complete the identification of historic properties within the Proposed Action's expanded APE and provide an update in the Final SEIS with results from the survey. The undertaking has already been determined to have adverse effects under NHPA due to the proposed demolition of historic properties, but additional adverse effects and direct, significant, adverse impacts under NEPA to cultural resources could occur during construction if archeological resources are encountered during construction. To reduce the risk of damage to known and unknown archeological sites, GSA would implement an archeological 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 activity within and around the immediate discovery area would cease until a qualified archaeologist can assess the nature and significance of the find. Implementation of these measures would minimize any potential additional adverse effects under NHPA and would reduce impacts to less-than-significant under NEPA.

Operations

During operations, 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 under NEPA to cultural resources during the operational phase would be expected. Impact reduction measures would be implemented as applicable during maintenance activities, including inadvertent discovery procedures.

3.2.2.5 Impact Reduction Measures

To reduce the risk of damage to known and unknown archeological sites from ground disturbing activities, GSA would develop an archeological monitoring plan in Section 106 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 regarding the Proposed Action and will identify and develop appropriate measures to avoid, minimize or mitigate adverse effects on historic properties as necessary.

3.3 AIR QUALITY

This section describes the baseline conditions for air quality within the region and assesses the potential for local and regional air quality to affect, or be affected by, implementing the Proposed Action, including Alternative 1 and the No Action Alternative, 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.

3.3.1 Affected Environment

3.3.1.1 Region of Influence

The air quality ROI for the 2024 Final EIS is defined in Section 3.3.1.1 of that EIS as Cochise County. The air quality ROI for this SEIS remains the same as in the 2024 Final EIS and is also defined as Cochise County. Air quality is considered on a regional level, utilizing data from the Arizona Department of Environmental Quality (ADEQ).

3.3.1.2 Regulatory Setting and Requirements

Section 3.3.1.2 of the 2024 Final EIS discusses the regulatory setting and requirements for air quality that also apply to the Proposed Action, and is incorporated herein by reference. For air quality, this includes the description of the Clean Air Act (CAA), National Ambient Air Quality Standards (NAAQS), Arizona State Implementation Plan, and relevant Arizona state regulations outlined in Arizona Administrative Code Title 18, Chapter 2.

3.3.1.3 Existing Conditions

Air Quality

Section 3.3.1.3 of the 2024 Final EIS provides a background discussion of NAAQS, and is incorporated herein by reference. The U.S. Environmental Protection Agency (USEPA) has designated the Paul Spur/Douglas Planning Area, part of Cochise County, as a nonattainment area for particulate matter of 10 micrometers or smaller (PM_{10}) (USEPA 2024a). Additionally, the Paul Spur/Douglas Planning Area is a USEPA-designated maintenance area for sulfur dioxide (SO_2). 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). If the project's emissions are below these thresholds, it is considered to have a negligible impact on air quality. For PM_{10} in a moderate nonattainment area, the *de minimis* threshold is 100 tons per year. For SO_2 in a maintenance area, the *de minimis* threshold is also 100 tons per year (USEPA 2024b).

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_{10} and ozone (O_3). Cochise County does not have a monitoring station for other criteria pollutants (USEPA 2024c). Therefore, carbon monoxide (CO), nitrogen dioxide (NO_2), and SO_2 data were taken from monitoring stations located in Pima County, particulate matter of 2.5 micrometers or smaller ($PM_{2.5}$) data were taken from a monitoring station in Santa Cruz County, and lead monitoring data were taken from Pinal County. These monitoring stations represent the closest available data collection points for the listed pollutants relative to the project area.

Table 3.3-1 shows the NAAQS, monitored concentrations, and air monitor location for each criteria pollutant. 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 (2024)	Monitor Location
CO	1-hour	35 ppm	1.34 ppm	Tucson, AZ (Pima County)
	8-hour	9 ppm	0.7 ppm	Tucson, AZ (Pima County)
NO_2	1-hour	100 ppb	38.5 ppb	Tucson, AZ (Pima County)
	Annual arithmetic mean	53 ppb	38.5 ppb	Tucson, AZ (Pima County)
O_3	8-hour	0.070 ppm	0.09 ppm	Chiricahua National Monument (Cochise County)
SO_2	1-hour	75 ppb	0.9 ppb	Tucson, AZ (Pima County)
$PM_{2.5}$	24-hour	35 µg/m^3	35.7 µg/m^3	Nogales, AZ (Santa Cruz County)
	Annual arithmetic mean	12 µg/m^3	35.7 µg/m^3	Nogales, AZ (Santa Cruz County)
PM_{10}	24-hour	150 µg/m^3	180 µg/m^3	Douglas, AZ (Cochise County)
Pb[a]	3-month average	0.15 µg/m^3	0.31 µg/m^3	Hayden, AZ (Pinal County)

Source: USEPA 2024c, USEPA 2024d
[a] Lead is not considered further in this analysis because none of the project activities would generate lead emissions.
µg = micrograms; CO = carbon monoxide; m^3 = cubic matter of diameter 10 micrometers or smaller; ppm = parts per million; ppb = parts per billion; SO_2 = sulfur dioxide
Note: Only the primary NAAQS are listed. If multiple monitors are present in a county, the monitor with the highest recorded pollutant concentrations is listed.

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 locations 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 project area are listed in Table 3.3-2.

Table 3.3-2. Sensitive Receptor Locations for Air Pollutants Within 1 Mile of the Project Area

Receptor Type	Receptor	Direction from Project Area	Distance (feet)
Hospital	Copper Queen Community Hospital Rural Health Clinic	North	700
Hospital	Pima Heart & Vascular Rural Health Clinic	North	700
School	Center for Academic Success	Northeast	1,450
Preschool	Headstart Douglas	Northeast	1,600
School	Sarah Marley Elementary School	Northeast	2,100
School	Center for Academic Success	East	2,400
Daycare	Coqui Children's Center	Northeast	3,800
Assisted Living Facility	Cypress Inn Assisted Living Facility	Northeast	4,200
School	Ray Borane Middle School	Northeast	4,300
School	Clawson Elementary School	Northeast	3,800

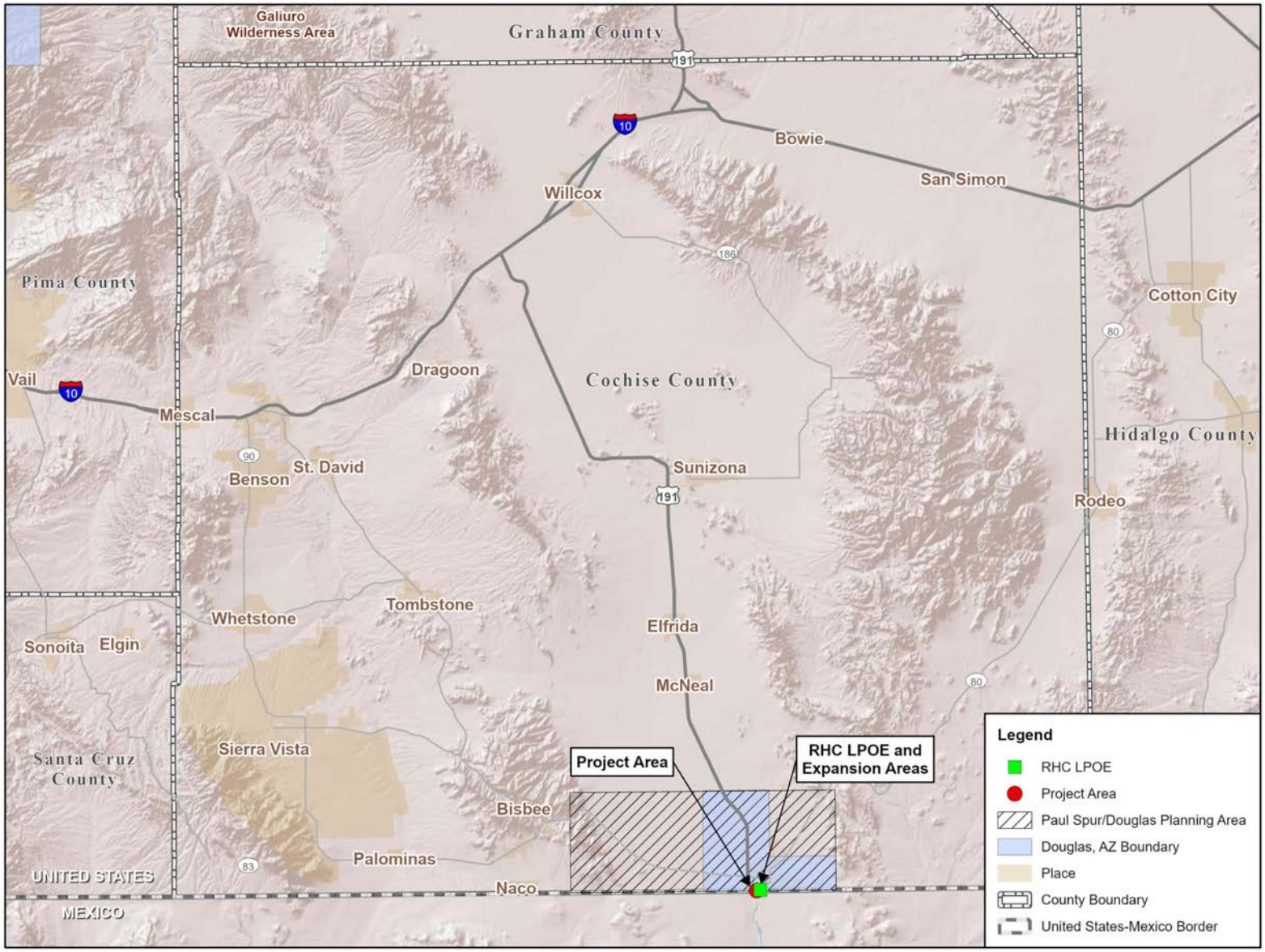


Figure 3.3-1. Location of the Proposed Action Relative to the Paul Spur/Douglas Planning Area

3.3.2 Environmental Consequences

3.3.2.1 Methodology

To evaluate air quality impacts, 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 emissions associated with electricity generation.

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

- Emissions of criteria pollutants or hazardous air pollutants 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 in Section 3.3.2.4.

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_{10} and a maintenance area for SO_2, 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, volatile organic compounds [VOCs] [as a precursor for O_3], nitrogen oxides (NO_x), SO_2, PM_{10}, and $PM_{2.5}$) 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_{10} and $PM_{2.5}$ were derived from USEPA's AP-42 (USEPA 2021).

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, excavation, and grading 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.

3.3.2.2 No Action Alternative

Under the No Action Alternative, the RHC LPOE Expansion and Modernization Project would be constructed as described in the 2024 Final EIS. However, GSA would not demolish portions of the existing stormwater channel; would not realign a segment of the Rose Avenue channel; would not construct a new stormwater basin; and would not replace or install electrical, sanitary sewer, fiber optic utilities, or any other associated supporting facilities. In addition, no acquisition or establishment of land use agreements would occur on parcels of land proposed for the project. Impacts to air quality would be limited to those as described for the 2024 Final EIS preferred alternative in Section 3.3.2.2 of the 2024 Final EIS, which is incorporated herein by reference.

3.3.2.3 Alternative 1 – Flood Control and Utility Upgrades

Construction

Air Quality

The results of the conformity analysis for construction of Alternative 1 are presented in Table 3.3-3. As Alternative 1 would be conducted in conjunction with the 2024 Final EIS preferred alternative, emissions for this alternative are presented in Table 3.3-3 for context. 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 Alternative 1

Source	Criteria Pollutant Emissions (tons)					
	CO	NO_x	PM_{10}	$PM_{2.5}$	SO_2	VOCs
Construction Equipment	0.10	0.18	0.01	0.01	0.00	0.02
Worker Vehicles	0.19	0.01	0.00	0.00	0.00	0.01
Delivery and Waste Trucks	0.51	0.50	0.05	0.03	0.00	0.04
Fugitive Dust	––	––	2.30	1.24	––	––
Alternative 1 Total	**0.80**	**0.70**	**2.37**	**1.28**	**0.00**	**0.07**
2024 Final EIS Preferred Alternative Total (worst case – 2026)	**9.47**	**4.35**	**41.91**	**22.50**	**0.03**	**0.67**
Total	**10.27**	**5.71**	**44.28**	**23.78**	**0.03**	**0.74**
De minimis Threshold (tons/year)	*100*	*100*	*100*	*70*	*100*	*10*

Source: USEPA 2024d, USEPA 2021
CO = carbon monoxide; NO_x = nitrogen oxides; $PM_{2.5}$ = particulate matter of 2.5 micrometers or smaller; PM_{10} = particulate matter of 10 micrometers or smaller less; SO_2 = sulfur dioxide; VOC = volatile organic compounds
Note: Individual numbers may not sum to totals due to rounding.

As shown in Table 3.3-3, 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. Therefore, further analysis under the General Conformity Rule is not required. In addition, the PM_{10} emissions estimates presented in Table 3.3-3 assume uncontrolled emissions of fugitive dust; in practice, PM_{10} emissions would likely be lower because GSA would take steps to minimize fugitive dust, as discussed in Section 3.3.2.4. Compared to the estimated air emissions of the RHC LPOE and Commercial LPOE construction under the 2024 Final EIS preferred alternative (see Table 3.3-14 of the 2024 Final EIS), Alternative 1 would generate a negligible amount of emissions, including for nonattainment and maintenance criteria pollutants in the Paul Spur/Douglas Planning Area

(i.e., PM_{10} and SO_2). As shown in Table 3.3-3, when combining the total emissions from the expansion and modernization of the RHC LPOE under the 2024 Final EIS preferred alternative (worst case for 2026) with emissions from Alternative 1, the emissions would be well below *de minimis* threshold levels.

Overall, Alternative 1 would result in short-term, minor, adverse, direct and indirect impacts to air quality during construction. Individuals living or working in close proximity to the project area of Alternative 1 would be most affected, similar to impacts discussed in the 2024 Final EIS. These impacts are expected to occur over a 6-month period. Construction of utility upgrades (i.e., stormwater basin and electrical, sanitary sewer, and fiber optic utility upgrades) is expected to occur during the construction of the RHC LPOE Expansion and Modernization Project as considered in the 2024 Final EIS. Construction of the realigned Rose Avenue channel segment is expected to occur prior to construction of the RHC LPOE Expansion and Modernization Project as considered in the 2024 Final EIS. For purposes of analysis, it was assumed all construction emissions would occur during a 6-month period.

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 3.3-6 of the 2024 Final EIS provides an overview of the applicability of the federal CAA air regulations to the RHC LPOE Expansion and Modernization Project that also pertains to this Proposed Action, and is incorporated herein by reference.

Operations

Operations under Alternative 1 would have long-term, negligible, adverse, and indirect impacts on air quality. The project does not involve the installation of any new permanent emission sources. Periodic maintenance activities may result in minimal emissions from maintenance vehicles and equipment, but these would be infrequent and negligible in scale. Furthermore, the improved stormwater management could potentially lead to fewer flood events, which might indirectly reduce emissions associated with flood cleanup and repair activities. There may also be negligible amounts of potential fugitive dust from proposed stormwater channel (if the stormwater channel is designed as riprap-lined) or new stormwater basin during dry, windy conditions. Proper design and regular maintenance of the stormwater management facilities should further minimize the potential for fugitive dust emissions.

3.3.2.4 Impact Reduction Measures

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

- Use cement blended with the maximum feasible amount of fly ash or other materials that reduce emissions from cement production.
- Recycle construction debris to the maximum extent feasible.
- Consider using locally source materials to reduce transportation emissions.

3.4 LAND USE

This section describes the baseline conditions for land use within and surrounding the project area 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 Alternative 1 and the No Action Alternative, 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.

3.4.1 Affected Environment

3.4.1.1 Region of Influence

The land use ROI for the 2024 Final EIS is defined in Section 3.4.1.1 of that EIS as the RHC LPOE, the proposed Commercial LPOE site, and adjacent areas surrounding both sites, including the proposed expansion areas for the RHC LPOE. As shown in Figure 2-1, the 2024 Final EIS ROI contains a portion of the Proposed Action including the area of the proposed demolition of the existing stormwater channel segment that parallels the western side of Pan American Avenue between East 3rd Street and the southern end of the existing RHC LPOE, a portion of the area proposed for realignment of a segment of the Rose Avenue channel, and a portion of the new stormwater basin. The Proposed Action's ROI includes these portions of the 2024 Final EIS ROI as well as all land located within the Proposed Action's limits of disturbance, located both to the east and west of the RHC LPOE Expansion and Modernization Project Area (see Figure 2-1). The ROI also includes land areas adjacent to the Proposed Action limits of disturbance.

3.4.1.2 Regulatory Setting and Requirements

Section 3.4.1.2 of the 2024 Final EIS discusses the regulatory setting and requirements for land use that also apply to the Proposed Action, and is incorporated herein by reference. This includes the description of city and county zoning, applicable provisions of the CAA, the National Scenic Byways Program, and GSA facility standards.

3.4.1.3 Existing Conditions

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 the City 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. 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 (see Figure 1-1).

The RHC LPOE is located at 1st 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 portion of the City of Douglas from shopping and commercial complexes on the east side of the city. The downtown portion of the City of Douglas is located approximately eight city blocks north of the RHC LPOE and the project area.

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, 1st Street to the north, Pan American Avenue to the west, and the U.S. – Mexico border to the south. For a more detailed description of the existing land uses near the project area, including at the current RHC LPOE and the adjacent project area for development of the 2024 Final EIS preferred alternative, see Section 3.4.1.3 of the 2024 Final EIS.

The project area can be characterized as mostly undeveloped, desert land with clusters of desert vegetation with unpaved roads and unpaved trails interspersed. In addition, some portions of the project area proposed for utility upgrades are located in existing rights-of-way along transportation networks and adjacent to some commercial businesses and industrial areas. Construction debris piles exist on the north end of the project

area (see Section 3.9, Human Health and Safety). An aboveground power line and other subsurface utilities traverse the project area (see Section 3.8, Infrastructure and Utilities). The surrounding areas also consist of a similar open, undeveloped landscape, although some buildings, structures, and similar construction debris piles exist on adjacent parcels. Lands adjacent and near to this project area include open undeveloped areas, an unnamed wash, Paseo de las Americas Linear Park, and a large commercial development to the north; the U.S. – Mexico border and commercial, industrial, and residential areas in the City of Agua Prieta, Mexico to the south; open undeveloped areas, the RHC LPOE, commercial areas, and parking lots to the east; and an unnamed wash, open undeveloped areas, the City of Douglas WWTP, and Freeport McMoran facilities and slag piles (see Section 3.9, Human Health and Safety) to the west.

The existing segment of the Rose Avenue channel planned for demolition is located west of Pan American Avenue and south of East 3rd Street in land zoned by the City of Douglas as light industrial and open space. The land parcels containing the existing stormwater channel segment planned for demolition are owned by the City of Douglas (Parcel Number 409-090-71G) and the federal government (Parcel Number 409-090-71B) (Cochise County 2025).

The proposed realigned Rose Avenue channel segment would originate at an extended CBC located beneath the existing POV lanes south of the RHC LPOE inspection area and would generally travel west, north of Border Road; and then terminate at the unnamed wash west of Chino Road. This area is located on a combination of land within and outside of the City of Douglas city limits. One segment is located outside of the city limits just west of the RHC LPOE, is zoned by Cochise County as General Business, and is owned by a private landowner. A second segment is located near the termination point of the unnamed wash at the U.S. – Mexico border, is zoned by Cochise County as Heavy Industrial, and owned by the City of Douglas (Cochise County 2025). The rest of the project area is located within the City of Douglas's city limits, is zoned by the City of Douglas as light industrial and open space, and is owned by the City of Douglas and a private landowner (Cochise County 2025).

The proposed new stormwater basin would be located just north of the proposed realigned Rose Avenue channel segment on approximately 6.2 acres of undeveloped land between the existing RHC LPOE and Chino Road. The land for the proposed new stormwater basin is zoned by the City of Douglas as light industrial and is owned by private landowners (Cochise County 2025).

The proposed areas for all other utility upgrades (i.e., electrical, sanitary sewer, and fiber optic) are zoned by the City of Douglas as light industrial, open space, and general commercial and are owned by the City of Douglas, GSA, and multiple private landowners (Cochise County 2025). Segments of the sanitary sewer utility upgrade project area, between Chino Road and the City of Douglas WWTP are located outside the City of Douglas's city limits, are zoned by Cochise County as Heavy Industrial, and are owned by the City of Douglas and multiple private landowners (Cochise County 2025).

Figures 3.4-1 and 3.4-2 illustrate the zoning map for the City of Douglas and a land ownership map with parcels for the project area, respectively. Table 3.4-1 lists the parcels that intersect with the Proposed Action (see Figure 3.4-2) and provides details on landowners and current land uses for each of those parcels.

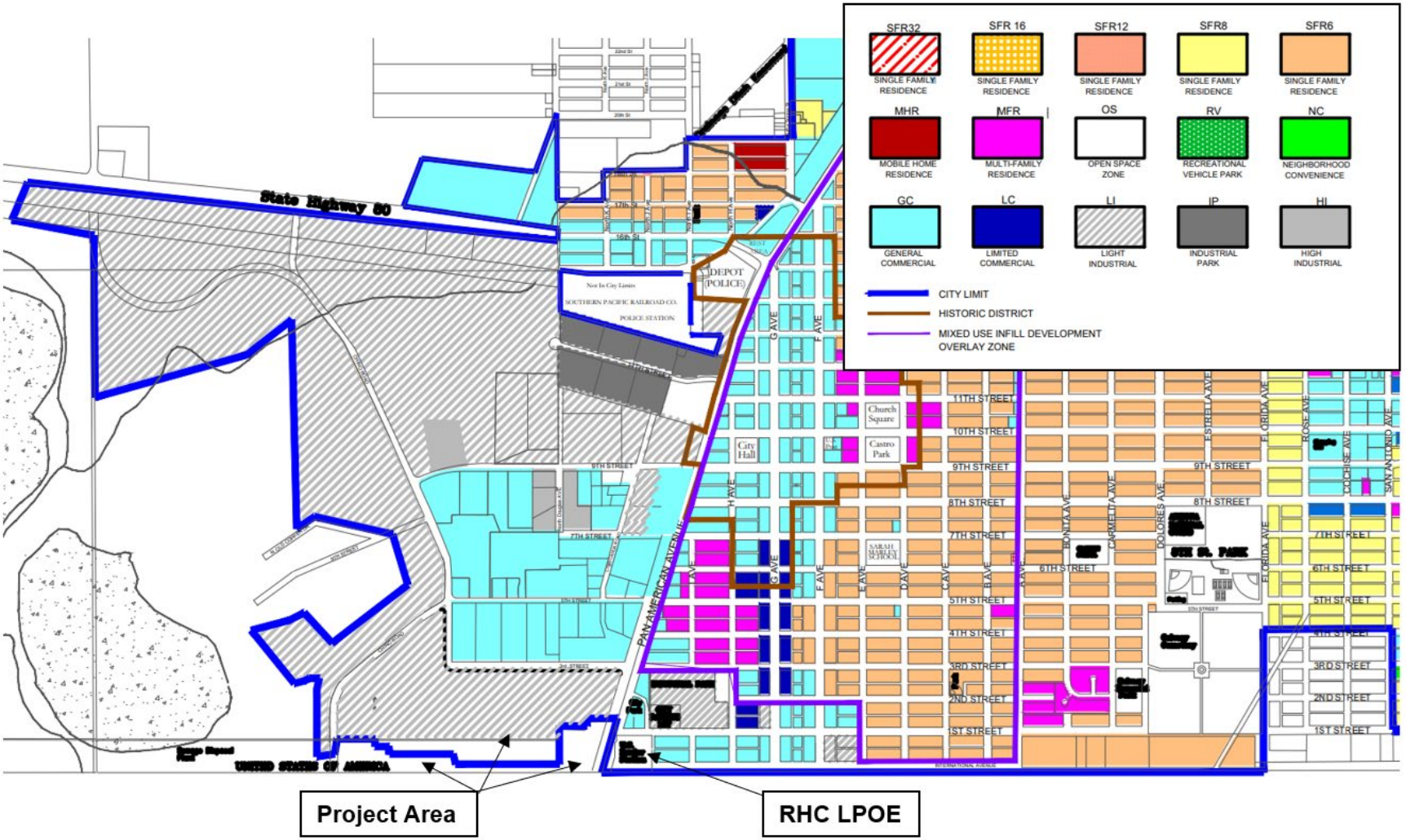


Figure 3.4-1. Zoning Map of City of Douglas

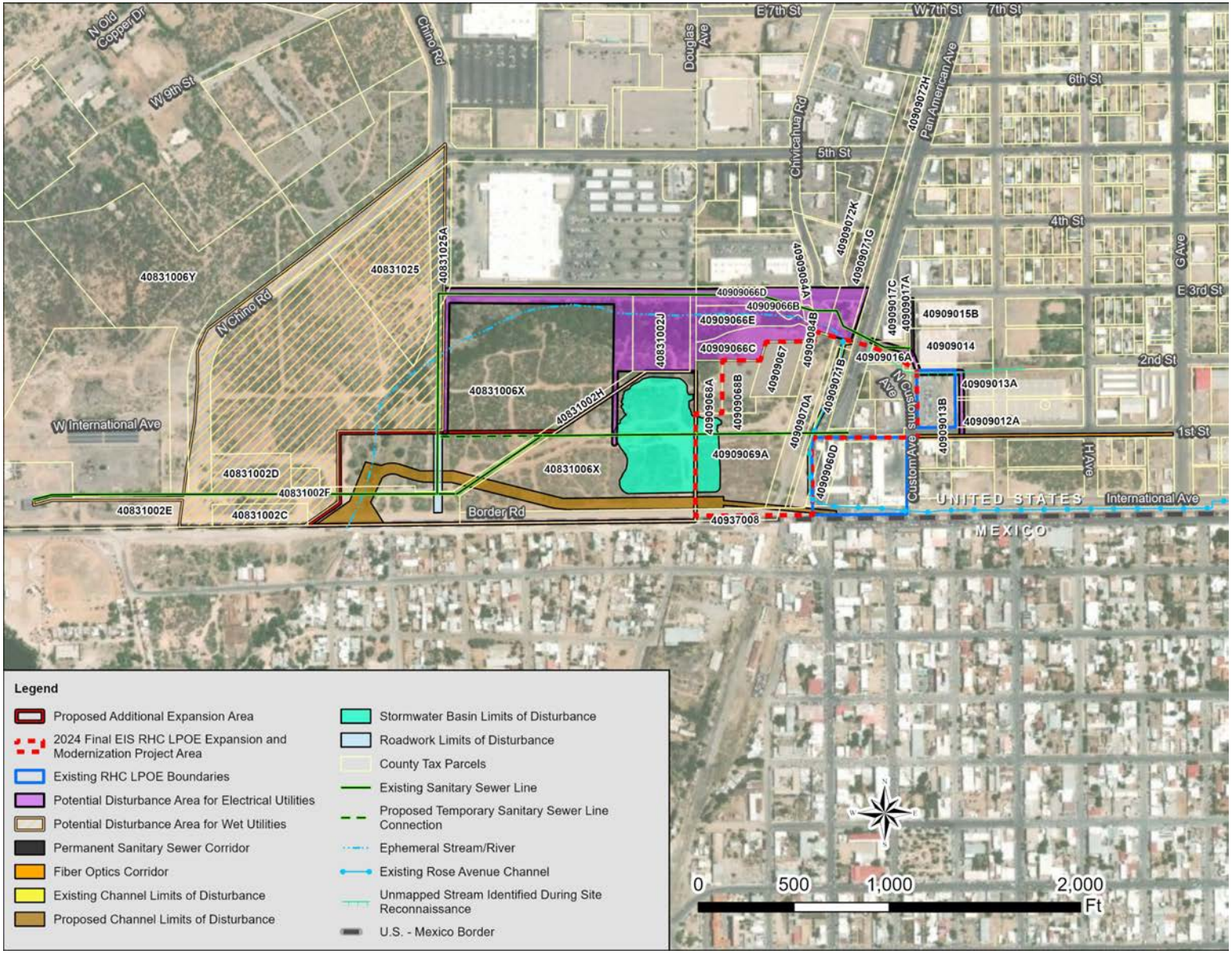


Figure 3.4-2. Land Ownership Map of the Project Area and Adjacent Properties

Table 3.4-1. Land Use and Ownership of Project Area

Parcel Number[a]	Owner	Zoning	Current Land Use
621189	Federal	N/A	Border Road
621293	Federal	N/A	Border Road
408-301-02E	City of Douglas	Open Space	Vacant; Chino Road; Border Road; City of Douglas WWTP
408-310-02H	City of Douglas	Open Space, Light Industrial	Vacant
408-310-06X	Private	Open Space, Light Industrial	Vacant; Chino Road; Border Road; East 3rd Street
408-310-02C	Private	Heavy Industrial[b]	Vacant, Border Road
408-310-02D	Private	Heavy Industrial[b]	Vacant
408-310-02E	City of Douglas	Heavy Industrial[b]	Vacant; Border Road; WWTP
408-310-02F	City of Douglas	Heavy Industrial[b]	Vacant
408-310-02J	Private	Light Industrial	Vacant
408-310-25	Private	Light Industrial	Vacant
408-310-25A	City of Douglas	Open Space	Chino Road
409-090-12A	City of Douglas	Light Industrial	Commercial building, parking lot/storage area
409-090-13A	City of Douglas	Light Industrial	Commercial buildings, parking lot, vacant
409-090-13B	Federal	Light Industrial	Parking lot, vacant
409-090-14	City of Douglas	Light Industrial	Commercial building, parking lot, landscaping
409-090-15B	City of Douglas	Light Industrial	Commercial building, parking lot, landscaping
409-090-16A	City of Douglas	General Commercial, Open Space	Vacant, North Customs Avenue
409-090-17A	City of Douglas	Light Industrial	Vacant
409-090-17C	Private	General Commercial	Commercial building, parking lot
409-090-60D	Federal	N/A	RHC LPOE
409-090-66B	Private	Light Industrial	Vacant
409-090-66C	Private	Light Industrial	Vacant, commercial site
409-090-66D	City of Douglas	Open Space	East 3rd Street and rights-of-way
409-090-66E	City of Douglas	Light Industrial	Vacant, commercial site
409-090-067	City of Douglas	Light Industrial	Commercial site
409-090-68A	Private	Light Industrial	Vacant, commercial building
409-090-68B	City of Douglas	Light Industrial	Vacant, commercial site
409-090-69A	Private	General Business[b]	Vacant, unpaved roads, vegetation; former site of cattle pens

Parcel Number[a]	Owner	Zoning	Current Land Use
409-090-70A	City of Douglas	Open Space, Light Industrial	Vacant; unpaved road/lot; paved sidewalk; landscaping; former site of railroad tracks; stormwater drainage feature
409-090-71B	Federal	Open Space	RHC LPOE; vacant; portion of Pan American Avenue; stormwater drainage feature; pedestrian walkway
409-090-071G	City of Douglas	Light Industrial	Vacant; unpaved road/lot; paved sidewalk; landscaping; former site of railroad tracks; stormwater drainage feature; pedestrian walkway; East 3rd Street; city park
409-090-72H	City of Douglas	Open Space	East 3rd Street, Pan American Avenue, rights-of-way
409-090-72K	City of Douglas	Light Industrial	North Chiricahua Road, East 3rd Street, sidewalks, parking lot, unpaved road, city park, rights-of-way
409-090-84A	Private	Light Industrial	Vacant, unpaved road
409-090-84B	Private	Light Industrial	Vacant, unpaved road
409-370-08	Federal	Open Space	Border Road

Source: Cochise County 2025
[a] Refer to Figure 3.4-2 for parcel locations.
[b] Cochise County zoning district
N/A = not applicable; RHC LPOE = Raul Hector Castro Land Port of Entry; WWTP = wastewater treatment plant

3.4.2 Environmental Consequences

3.4.2.1 Methodology

To evaluate the impacts to land use, 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; or
- Changes in land ownership.

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 project area; or
- Conflicts with regional or local land use plans and zoning.

3.4.2.2 No Action Alternative

Under the No Action Alternative, the RHC LPOE Expansion and Modernization Project would be constructed as described in the 2024 Final EIS. However, GSA would not demolish portions of the existing stormwater channel; would not realign a segment of the Rose Avenue channel; would not construct a new stormwater basin; and would not replace or install electrical, sanitary sewer, fiber optic utilities, or any other associated supporting facilities. In addition, no acquisition or establishment of land use agreements would occur on parcels of land proposed for the project. Impacts to land use would be limited to those as described for the 2024 Final EIS preferred alternative in Section 3.4.2.2 of the 2024 Final EIS, which is incorporated herein by reference.

3.4.2.3 Alternative 1 – Flood Control and Utility Upgrades

Construction

Alternative 1 would result in short-term, minor, adverse, and direct impacts on land use from changes in land use designations that would occur prior to construction. Under Alternative 1, the existing stormwater channel segment within the 2024 Final EIS preferred alternative project area would be demolished, and the land area would be developed as part of the larger expansion and modernization of the RHC LPOE. Alternative 1 would also convert vacant land to a stormwater channel, stormwater basin, and associated supporting facilities. Other proposed utility upgrades would be located primarily within either existing or newly established rights-of-way and adjacent to existing transportation networks, commercial businesses, industrial areas, or directly adjacent to the expanded and modernized RHC LPOE. As shown on Figure 3.4-2 and Table 3.4-1, the project area consists of federally-, city-, and privately-owned parcels. Alternative 1 may include land acquisition of city- and privately-owned parcels, which would be transferred to federal ownership and redesignated as GSA property. For properties selected for land acquisition that are eligible for assistance under the *Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970* (the Uniform Act), as enacted, GSA would provide assistance for applicable stakeholders in accordance with the *Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally-Assisted Programs* (49 CFR Part 24). Alternatively, GSA may elect to pursue an easement or similar type of right-of-way access agreement on the city- or privately-owned lands, particularly for utility upgrades. Under this scenario, GSA would coordinate with the landowners as necessary to establish such agreements. As necessary, any federally-owned property to be utilized would remain in federal ownership but would be redesignated as GSA property, in coordination with the respective federal agency.

Alternative 1 is not anticipated to have any direct or indirect adverse impact on adjacent landowners.

Operations

Operations of Alternative 1 would result in permanent, minor to moderate, beneficial, and direct and indirect impacts on land use due to improvements of undeveloped, underutilized space for flood control and utility needs in the vicinity of the project. In addition, maintenance of the proposed stormwater channel, new stormwater basin, and other proposed utility upgrades would be required to ensure their continued effectiveness. Operations of Alternative 1 are not anticipated to have any direct or indirect, adverse impacts on adjacent landowners.

3.4.2.4 Impact Reduction Measures

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 proposed realigned Rose Avenue channel segment and new stormwater basin and all design requirements of state and local governments to the extent practicable. To ensure minimal conflicts with land use, GSA would continue coordination efforts during the design process with city and county governments, Arizona Department of Transportation, utility providers, and other stakeholders, as applicable and necessary.

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 Alternative 1 and the No Action Alternative, 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 geology and soils ROI for the 2024 Final EIS is defined in Section 3.5.1.1 of that EIS as the RHC LPOE, proposed Commercial LPOE, and proposed expansion areas. As shown in Figure 2-1, the 2024 Final EIS ROI contains a portion of the Proposed Action including the area of the proposed demolition of the existing stormwater channel segment that parallels the western side of Pan American Avenue between East 3rd Street and the southern end of the existing RHC LPOE, a portion of the area proposed for realignment of a segment of the Rose Avenue channel, and a portion of the new stormwater basin. The Proposed Action's ROI includes these portions of the 2024 Final EIS ROI as well as all land located within the Proposed Action's limits of disturbance, located both to the east and west of the RHC LPOE Expansion and Modernization Project Area (see Figure 2-1).

3.5.1.2 Regulatory Setting and Requirements

Section 3.5.1.2 of the 2024 Final EIS discusses the regulatory setting and requirements for geology and soils that also apply to the Proposed Action, and is incorporated herein by reference. This includes the description of the Arizona Pollutant Discharge Elimination System (AZPDES) program, administered by the ADEQ, and the requirement to obtain coverage under the Construction General Permit (CGP).

3.5.1.3 Existing Conditions

Geology and Topography

The ROI for the Proposed Action shares the same geological features and similar topography as described in Section 3.5.1.3 of the 2024 Final EIS. The project area is situated within the Douglas Groundwater Basin, part of the larger Sulphur Spring Valley, and characterized by isolated fault-block mountains separated by debris-filled desert valleys. Key geological and topographical features of the ROI include:

- Elevation range of approximately 3,920 to 3,940 feet above mean sea level
- General downward slope from east southeast to west northwest
- Previously disturbed areas and undeveloped land, mainly consisting of densely-vegetated surfaces with roads and unpaved trails interspersed
- Local groundwater flow trending northwest

Section 3.5.1.3 of the 2024 Final EIS provides additional description of the geologic column, physiographic features, and regional geology, including the valley's formation, mountain ranges, and sedimentary deposits.

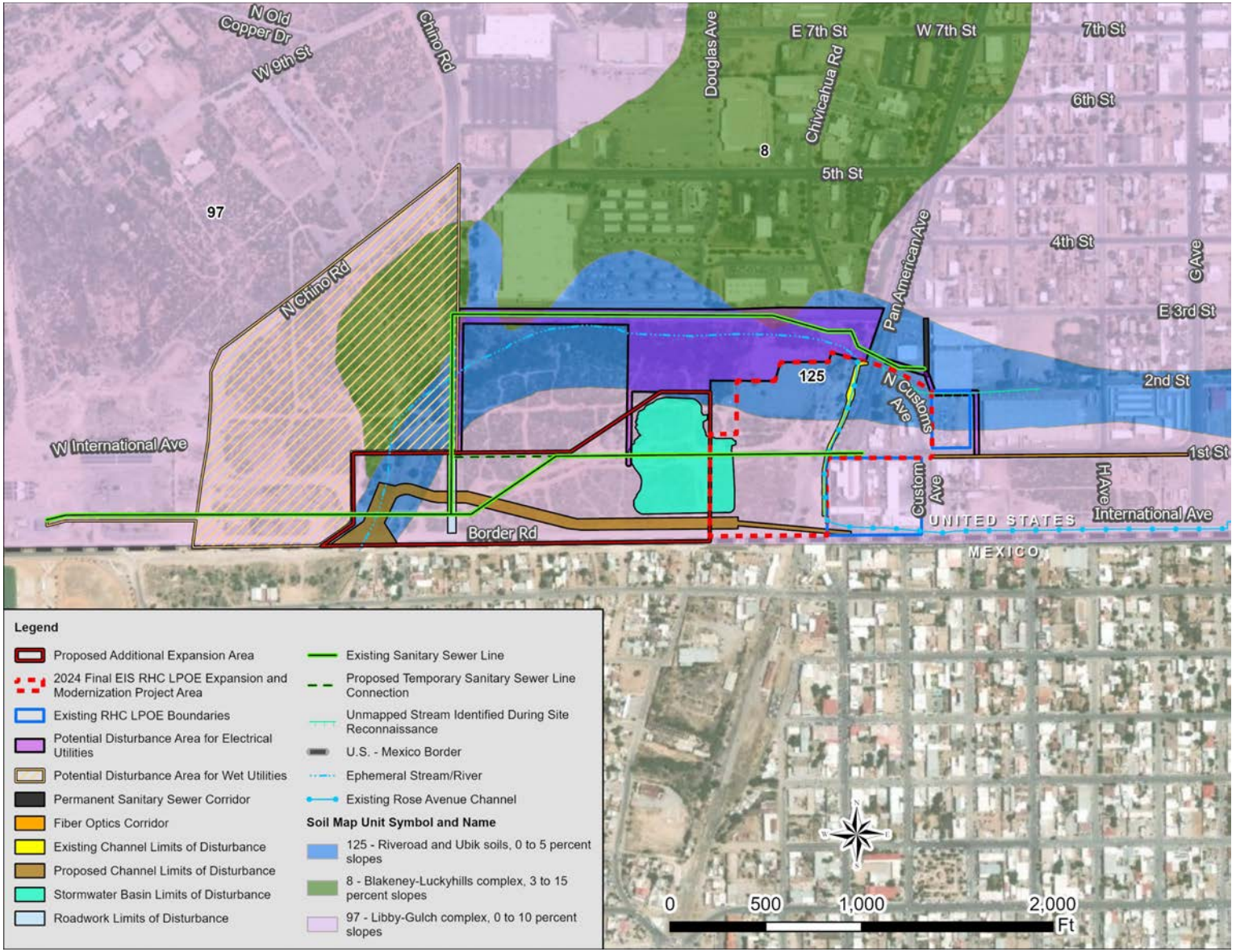
GSA will perform geotechnical sampling testing within the project area in support of project planning and design. Applicable results of the geotechnical sampling will be included in the Final SEIS.

Soils

Section 3.5.1.3 of the 2024 Final EIS provides background information on soils within the project area, and is incorporated herein by reference. Based on Natural Resource Conservation Service soil survey data, there are three soil associations historically associated with the project area for the Proposed Action (NRCS 2024a). Most of the 2024 Final EIS preferred alternative project area and the project area for this Proposed Action consist of Libby-Gulch complex (0 to 10 percent slopes) and Riveroad and Ubik soils (0 to 5 percent slopes). In addition, a small portion of the project area consists of Blakeney-Luckyhills complex soils (3 to 15 percent slopes). The soils mapped within the project area for the Proposed Action are described below and shown in Figure 3.5-1:

- **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 fan terraces, basin floors, and stream terraces (NRCS 2024b).
- **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, and 24 to 60 inches of gravelly clay loam. These soils are typically found on fan terraces, basin floors, and stream terraces (NRCS 2024b).
- **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 (NRCS 2024c).
- **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 (NRCS 2024c).
- **Blakeney, 3 to 15 percent slopes** – Well drained with high run off class, belonging to Hydrologic Soil Group D. The parent material of Blakeney is mixed calcareous fan alluvium. A typical Blakeney soil profile consists of a top layer of 0 to 11 inches of fine sandy loam, followed by 11 to 18 inches of cemented material, 18 to 41 inches of fine sandy loam, and 41 to 60 inches of loam. These soils are typically found in fan terraces (NRCS 2025).
- **Luckyhills, 3 to 15 percent slopes –** Well drained with medium runoff class, belonging to Hydrologic Soil Group A. The parent material of Blakeney is mixed calcareous fan alluvium. A typical Blakeney soil profile consists of a top layer of 0 to 3 inches of fine sandy loam, followed by 3 to 13 inches of fine sandy loam, and 13 to 60 inches of loam. These soils are typically found in fan terraces (NRCS 2025).

The soil types within the project area have rare or no frequency of flooding or ponding. The depth to the water table or any other restrictive feature of all of these soil types is more than 80 inches. The maximum calcium carbonate content is 40 percent for Libby and 55 percent for Gulch, respectively (NRCS 2024b).



Source: NRCS 2024a

Figure 3.5-1. Soils within the Project Area

The maximum calcium carbonate content is 5 percent for Riveroad, 3 percent for Ubik, 20 percent for Blakeney, and 30 percent for Luckyhills, respectively (NRCS 2024c).

As shown in Figure 2-1, the majority of the 12.6-acre expansion area to the west of RHC LPOE and Pan American Avenue included within the 2024 Final EIS preferred alternative and additional project area considered under this Proposed Action consists mainly of undeveloped open land, most of which has been disturbed by previous activities.

During a site walk for the Phase I Environmental Assessment conducted for the Proposed Action (GSA 2025), erosion and scour of channel banks were observed in the unnamed wash in the north section of the project area near the discharge point for the existing stormwater channel (see Figure 3.5-2). This is likely attributed to flooding occurring during rain events, and the confluence of flows from the discharge of stormwater from the north, south, and east into the unnamed wash (see Section 3.6, Water Resources). In addition, CBP has reported that areas within and near the project area experience ponding and muddy conditions following rain events due to overland flow from the unnamed wash (GSA 2024c).

Figure 3.5-2. Erosion and Scour of Channel Banks within Unnamed Wash, North Section of Project Area, facing West

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; or
- 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.

3.5.2.2 No Action Alternative

Under the No Action Alternative, the RHC LPOE Expansion and Modernization Project would be constructed as described in the 2024 Final EIS. However, GSA would not demolish portions of the existing stormwater channel; would not realign a segment of the Rose Avenue channel; would not construct a new stormwater basin; and would not replace or install electrical, sanitary sewer, fiber optic utilities, or any other associated supporting facilities. In addition, no acquisition or establishment of land use agreements would occur on parcels of land proposed for the project. While this would avoid direct disturbance to geology, topography, and soils from construction activities within the project area, it could lead to long-term, moderate, adverse, and indirect impacts on soils in the surrounding area. Without the construction of the new stormwater basin, the expanded and modernized RHC LPOE would lack adequate stormwater management facilities, which could result in increased offsite erosion during heavy rainfall events. The lack of a properly designed stormwater basin could also contribute to localized flooding, further exacerbating soil erosion issues in the vicinity of the RHC LPOE. In addition, impacts to geology and soils would also occur from construction and operations of the 2024 Final EIS preferred alternative as described in Section 3.5.2.2 of the 2024 Final EIS, which is incorporated herein by reference.

3.5.2.3 Alternative 1 – Flood Control and Utility Upgrades

Construction

Geology and Topography

Alternative 1 would result in short-term, minor, adverse, and direct impacts on geology during construction. These impacts would occur primarily from excavation and earth-moving operations. Construction of the realigned Rose Avenue channel segment would require excavation to a depth of approximately 5 feet and a uniform bottom width of 28 feet based on design estimates known at the time of this SEIS. Generally, the project would involve some disturbance or modification of surficial geological features, but these changes are anticipated to be localized and not substantially alter the overall geological characteristics of the project area.

Alternative 1 would result in long-term, minor, adverse, and direct impacts on topography during construction. The project would require some grading and reshaping of the slightly east-west sloped terrain. The excavation for the proposed stormwater channel would create a man-made linear depression. The primary modification to topography of the project area for the new stormwater basin would involve creating a shallower grade to facilitate stormwater management without substantially disrupting the current landscape. Replacing and installing all other utility upgrades would require some grading but is not expected to alter the topography in those areas, especially in areas where existing rights-of-way are utilized. Vegetation removal and necessary grading would occur, but overall topographical changes would be limited.

Soils

Alternative 1 would result in permanent, minor, adverse, and direct impacts on soils during construction. The project would disturb both previously undisturbed and disturbed soils as part of site preparation for the demolition of the existing stormwater channel segment, realignment of a segment of the Rose Avenue channel, construction of the new stormwater basin, and replacement and installation of other utilities (up to approximately 33.2 acres in total). The use of heavy equipment for site preparation would require vegetation removal, grading, excavation, and, for the proposed channel segment, filling with rock riprap or concrete. These activities would likely disrupt natural soil horizons and cause potential compaction or loosening of soils, which could reduce soil stability and increase wind and water erosion risks. Additionally, long-term soil productivity (i.e., the capacity of the soil to produce vegetative biomass) would be permanently affected due to the replacement of natural surfaces with impermeable structures.

The project would be subject to the Arizona Stormwater CGP, which specifies measures for stabilizing soils 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.

Operations

No impacts to geology or topography are anticipated during operations of Alternative 1. Operations of Alternative 1 would result in long-term, minor, beneficial, and indirect impacts on soils in the project area. Approximately 0.5 acres of the existing concrete-lined channel would be removed and the area would be planned for development as part of the RHC LPOE Expansion and Modernization Project. Approximately 4 acres of new permanent pervious or impervious surface coverage would be installed in the form of the realigned Rose Avenue channel segment. While this would represent a net increase in impervious surfaces, the improved stormwater management facilities, including the proposed realigned Rose Avenue channel segment and new stormwater basin, would be designed to optimize stormwater flow and drainage in the project area. Areas within and adjacent to the project area experiencing flooding would be addressed through improved stormwater management and flood control, especially during high flow events (see Section 3.6, Water Resources). Replacement and installation of other utilities would not require installation of additional impervious surfaces and would be located primarily within existing or newly established rights-of-way, and would be maintained by either the city or utility providers as applicable. As such, these improvements could potentially reduce soil erosion caused by large storm events and current flows into unnamed wash to the north and west of the project area as well as other areas near the RHC LPOE compared to existing conditions.

Routine maintenance for the new facilities would include preserving the integrity of the proposed stormwater channel, stormwater basin, and other utility upgrades, further contributing to soil stability and erosion control. Negligible adverse impacts to geology and soils resources are expected from maintenance activities.

3.5.2.4 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 Alternative 1 and the No Action Alternative, discussed in Chapter 2. Water resources can 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 surface water, floodplains, and wetlands ROI for the 2024 Final EIS is defined in Section 3.6.1.1 of that EIS as the project areas for the construction and operation of the proposed Commercial LPOE and the expanded and modernized RHC LPOE, as well as the downstream surface waters that would receive stormwater discharges from construction and operations. As shown in Figure 2-1, the 2024 Final EIS ROI contains a portion of the Proposed Action including the area of the proposed demolition of the existing stormwater channel segment that parallels the western side of Pan American Avenue between East 3rd Street and the southern end of the existing RHC LPOE, a portion of the area proposed for realignment of a segment of the Rose Avenue channel, and a portion of the new stormwater basin. The Proposed Action's ROI includes these portions of the 2024 Final EIS ROI as well as all land located within the Proposed Action's limits of disturbance, located both to the east and west of the RHC LPOE Expansion and Modernization Project Area (see Figure 2-1). The ROI also includes the downstream surface waters that would receive stormwater discharges from the construction and operation of the Proposed Action.

The ROI for groundwater resources is the same as defined in Section 3.6.1.1 of the 2024 Final EIS and includes any drinking water aquifer that underlies the project area, 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

Section 3.6.1.2 of the 2024 Final EIS discusses the regulatory setting and requirements for water resources that also apply to the Proposed Action, and is incorporated herein by reference. This includes the description of the Clean Water Act (CWA); the Arizona Surface Water Protection Program; the National Pollutant Discharge Elimination System program; Section 438 of the Energy Independence and Security Act (EISA) of 2007; the Federal Safe Drinking Water Act; Cochise County Stormwater Ordinance (Ordinance No. 049-18); the Arizona Groundwater Management Act; EO 11988, *Floodplain Management*; and EO 11990, *Protection of Wetlands*.

In addition, the National Flood Insurance Act of 1968 established the National Flood Insurance Program (NFIP), which includes flood mapping and flood risk information. The Federal Emergency Management Agency (FEMA) administers the NFIP and maintains and updates floodplain maps to reflect changing conditions as part of the program. Any modifications to floodplains, such as those caused by construction or natural changes, may necessitate a Letter of Map Revision (LOMR), which is a letter from FEMA officially revising the current NFIP map to show changes to floodplains, regulatory floodways, or flood elevations. A Conditional LOMR (CLOMR) is a letter from FEMA commenting on whether a proposed project, if built as proposed, or proposed hydrology changes, would meet minimum NFIP standards (FEMA 2024). 44 CFR Part 65 includes requirements pertaining to updating floodplain data based on changes in base flood elevations due to physical changes in floodplain conditions; procedures for submitting a CLOMR or LOMR for changing floodplain boundaries, flood elevations, or the designated floodway; associated required technical criteria for such updates; and verification requirements that a program does not adversely impact flood conditions upstream or downstream. 40 CFR Part 60 includes encroachment requirements pertaining to floodways. The City of Douglas Code, Title 15 – Buildings and Construction; Chapter 15.20 – Floodplain Management specifies requirements for development within floodplains in the city. In

addition, Section 15.20.040 designates the City Engineer as the Floodplain Administrator for work within federally and/or locally mapped floodplains within the City of Douglas. The City of Douglas Zoning Code, Appendix A, Chapter X – Drainage and Construction includes stormwater management requirements for construction within the City of Douglas.

3.6.1.3 Existing Conditions

Geographic and Hydrologic Setting

Section 3.6.1.3 of the 2024 Final EIS provides a background discussion of the geographic and hydrologic setting, and is incorporated herein by reference. Specifically, that section summarizes the Douglas Groundwater Basin and general types of drainage channels present within the basin, average runoff and inches of rain per year, and cross border water management. Figure 3.6-1 illustrates the primary hydrologic features surrounding the project area.

Groundwater and Water Supply

Section 3.6.1.3 of the 2024 Final EIS provides a background discussion of groundwater and water supply, and is incorporated herein by reference. Specifically, Section 3.6.1.3 summarizes the current state of groundwater in the Douglas Groundwater Basin, depth-to-water levels, overall usage, and the status of the basin as an active management area.

There are no wells within the project area; however, there are three active wells and one abandoned well north of the U.S. – Mexico border within 1 mile of the project area. 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 2025a).

Surface Water

Section 3.6.1.3 of the 2024 Final EIS provides a background discussion of surface water within the Douglas Groundwater Basin, and is incorporated herein by reference. Specifically, Section 3.6.1.3 describes the primary drainage in the region (i.e., the Whitewater Draw) and associated characteristics of that drainage.

An unnamed intermittent wash is located to the north and along the western edge of the project area (see Figure 3.6-2). Approximately 2,400 linear feet of this unnamed wash crosses the project area. The unnamed wash originates just east of Pan American Avenue near East 3rd Street, flows east-west just south of East 3rd Street and then turns south before crossing the border into Mexico and draining into the Whitewater Draw.

Currently, stormwater runoff from the existing RHC LPOE ultimately drains to this unnamed wash via drain inlets that discharge into the Rose Avenue channel. A segment of the existing Rose Avenue channel runs through the 2024 Final EIS preferred alternative project area, parallel to Pan American Avenue directly west of the RHC LPOE, before discharging into the unnamed wash. See Section 3.8, Infrastructure and Utilities, for a detailed discussion of stormwater management facilities near the project area.

As described in Section 3.6.1.3 of the 2024 Final EIS, the City of Douglas was previously authorized under the AZPDES permit program to discharge its stormwater through a Municipal Separate Stormwater Sewer System (MS4) outfall to Palm Grove Wash.

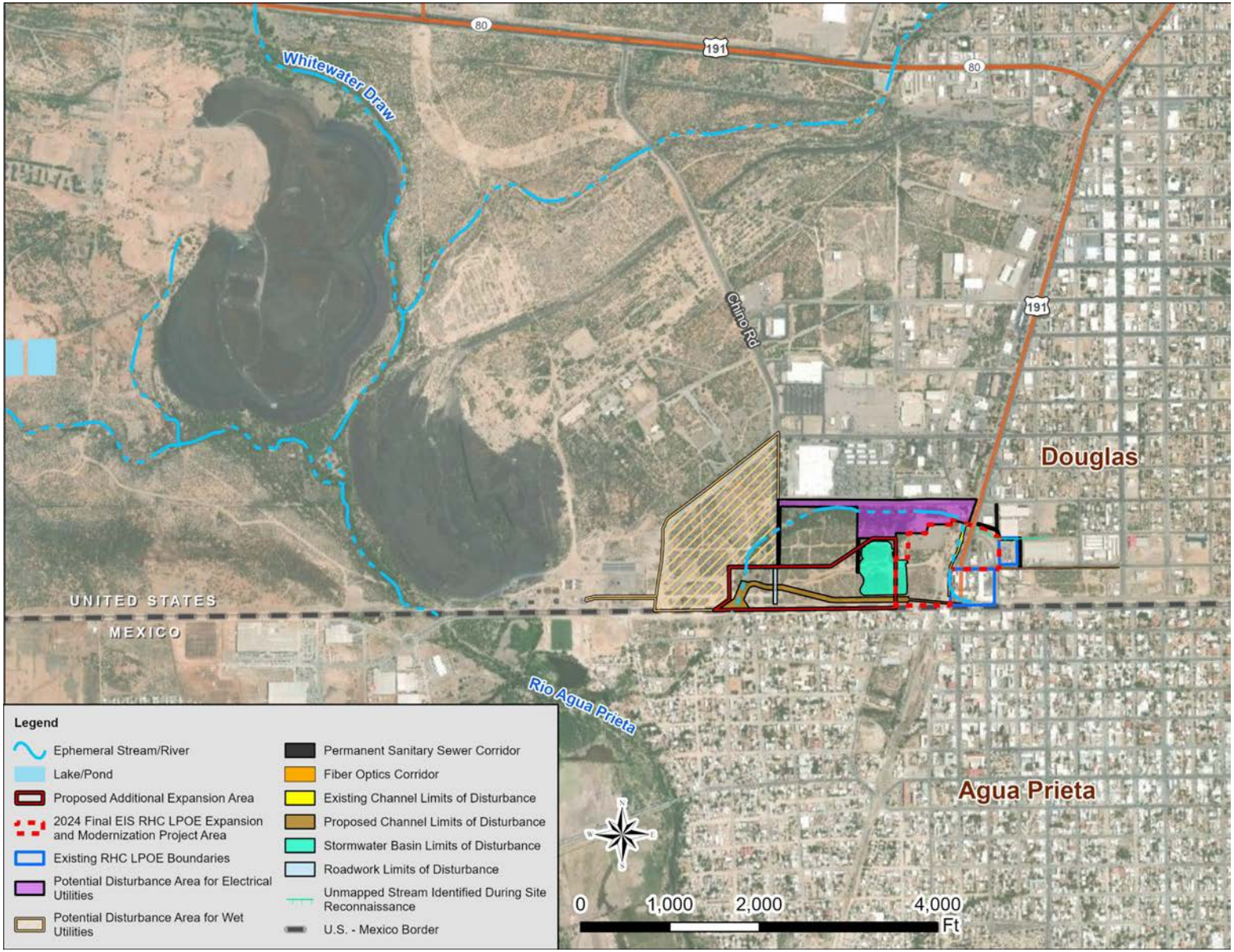


Figure 3.6-1. Hydrologic Features within the ROI

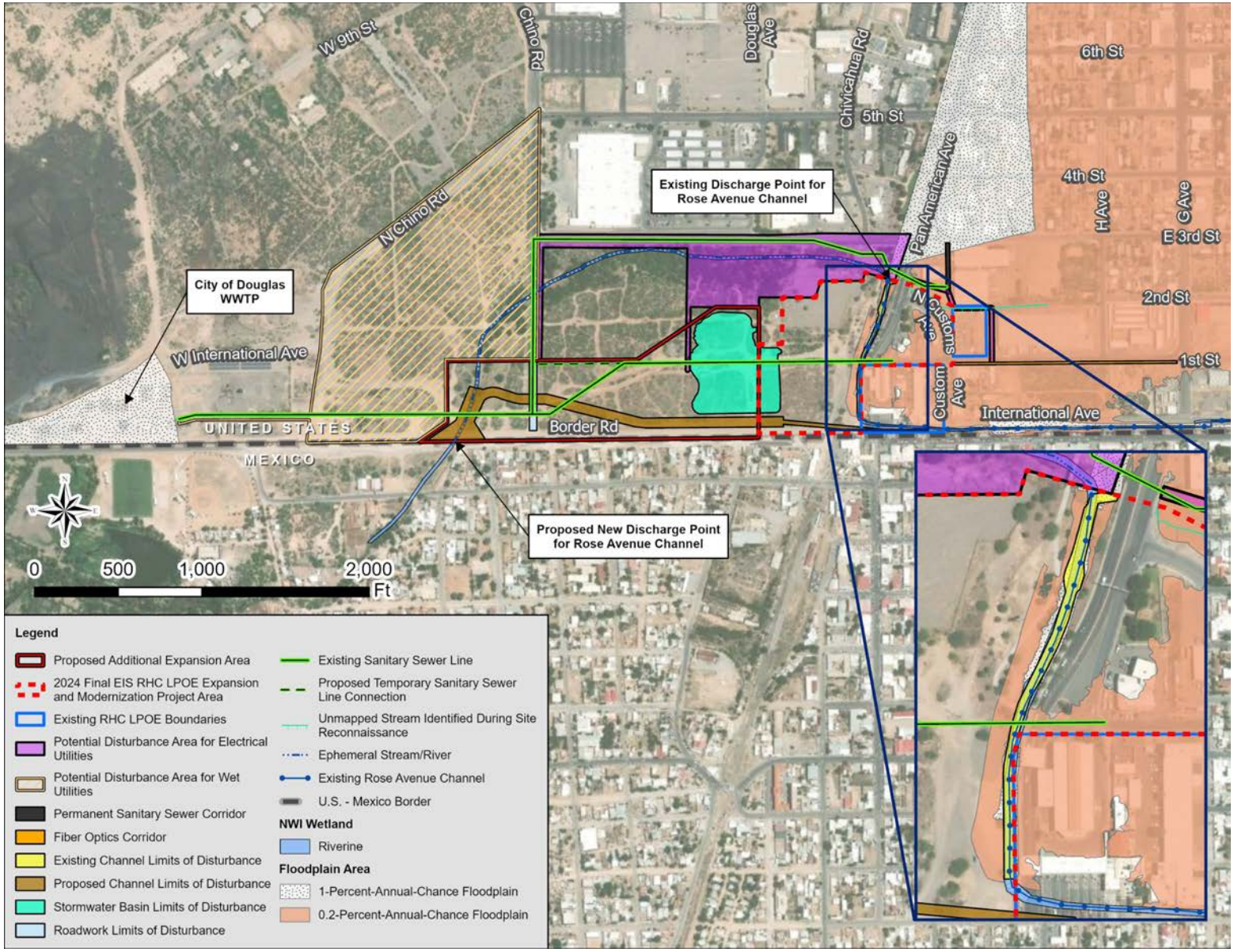


Figure 3.6-2. Water Resources Near the Project Area

On November 1, 2023, ADEQ received the City of Douglas Phase II MS4 notice of termination for review. After evaluation, ADEQ determined in an April 17, 2024 letter (Maressa 2024) that the City of Douglas does not discharge pollutants to a waters of the U.S. (WOTUS) protected surface water as defined by the revised WOTUS conforming rule. ADEQ also indicated that the City of Douglas has never met the automatic nationwide designated criteria, defined as a small MS4 with a population of 50,000 people or more within census blocks as determined by the latest decennial census. Upon receipt of the City of Douglas Phase II MSA notice of termination, ADEQ reassessed the residual designation authority used to regulate MS4 and found the city's stormwater discharge is unlikely to affect water quality standards or contribute pollutants to WOTUS. Therefore, ADEQ determined that the City of Douglas does not meet the criteria necessary to require a Phase II MS4 permit and then terminated the Phase II MS4 general permit (Maressa 2024).

Floodplains

The existing stormwater channel segment proposed for demolition, portions of the proposed utility upgrades, the existing RHC LPOE, and much of the City of Douglas are located within a low point of a regional drainage field, and are within Special Hazard Flood Areas designated as 1-percent-annual-chance (100-year floodplain) or 0.2-percent-annual-chance floodplains (500-year floodplain) (FEMA map number 04003C2883G) (FEMA 2016). The existing stormwater channel segment proposed for demolition contains 0.44 acre of 1-percent-annual-chance and 0.02 acre of 0.2-percent-annual-chance floodplains (see Figure 3.6-2). Potential disturbance to this area was considered in the 2024 Final EIS, although specific demolition of the existing stormwater channel was not considered. Segments of the proposed utility upgrades (electrical, sanitary sewer, and fiber optics) on the eastern portion of the project area are located within the 1-percent-annual-chance and 0.2-percent-annual-chance floodplains (0.31 acres and 2.94 acres, respectively). The disturbance from the eastern segments of the proposed utility upgrade were also not evaluated in the 2024 Final EIS.

The existing stormwater channel segment is designated as a regulatory floodway which 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" (FEMA 2020). Historically, areas near the project area along 1st Street and the entry to the Cargo Lot from Mexico have been particularly vulnerable to flooding (GSA 2019); however, a drainage correction project at the RHC LPOE was implemented within the last 5 years that improved flooding issues (Luttrell 2022). Flooding has remained an issue in the vicinity of the project area; there are known capacity issues with the unnamed wash's ability to handle existing stormwater flows from the existing Rose Avenue channel and other stormwater flows from the north and east. During high flow events, stormwater is known to overflow the unnamed wash and spread overland in the immediate area, causing ponding and muddy conditions in the adjacent areas, including the 2024 Final EIS preferred alternative project area and additional project area considered under this Proposed Action (GSA 2024c).

Flooding issues are also known to occur near where the unnamed wash crosses the U.S. – Mexico border, although this is due to flood gates within the border barrier infrastructure remaining closed during rain events.

The remainder of the project area is located outside of any 1-percent-annual chance or 0.2-percent-annual chance floodplains (FEMA map number 04003C2879F) (FEMA 2008); however, a segment of the proposed sanitary sewer line upgrade would be located adjacent to a 1-percent-annual-chance floodplain area near the City of Douglas WWTP (see Figure 3.6-2).

Wetlands and Waters of the U.S.

Per the USFWS National Wetlands Inventory, there are mapped riverine features (classified as Riverine Surface Flooding Seasonal [R4SBC]) associated with the unnamed wash as described above and as shown in Figure 3.6-2, including approximately 2,400 linear feet of the unnamed wash that crosses the project

area. The existing Rose Avenue channel proposed for demolition is also mapped as a riverine feature (approximately 870 feet) within the National Wetlands Inventory dataset. GSA will survey the project area to assess for the presence of wetlands and WOTUS within the project area. Updates will be included within the Final SEIS.

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; or
- 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 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, the RHC LPOE Expansion and Modernization Project would be constructed as described in the 2024 Final EIS. However, GSA would not demolish portions of the existing stormwater channel; would not realign a segment of the Rose Avenue channel; would not construct a new stormwater basin; and would not replace or install electrical, sanitary sewer, fiber optic utilities, or any other associated supporting facilities. In addition, no acquisition or establishment of land use agreements would occur on parcels of land proposed for the project. Long-term, moderate, adverse, and indirect impacts to water resources would be anticipated. While there would be no direct impacts to groundwater or wetlands within the project area, the overall stormwater management and flood control needs for the expanded and modernized RHC LPOE would not be addressed, stormwater flow would not be diverted, and engineering

conflicts between the current alignment of the Rose Avenue channel and the proposed RHC LPOE Expansion and Modernization Project layout would remain. The No Action Alternative would also increase flood potential at the expanded and modernized RHC LPOE and surrounding area, increasing risks that the RHC LPOE could be partially shutdown or impacted during a storm event, impeding the LPOE's functionality, and jeopardizing the security and safety at the RHC LPOE. In addition, impacts to water resources would also occur from construction and operations of the 2024 Final EIS preferred alternative as described in Section 3.6.2.2 of the 2024 Final EIS, which is incorporated herein by reference.

3.6.2.3 Alternative 1 – Flood Control and Utility Upgrades

Construction

Groundwater and Water Supply

No impacts to groundwater during construction are anticipated. While there could be an increased potential for spills of petroleum products or other hazardous materials stored onsite during construction to impact groundwater, 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 3.9, Human Health and Safety). Groundwater is not anticipated to be encountered based on the levels of groundwater (i.e., 136 feet) observed at the most proximate well, which is located approximately 1,100 feet northwest of the project area (ADWR 2025b). Should any 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).

Alternative 1 would result in short-term, negligible, adverse, and direct impacts on regional water supply during construction. Water used for construction would be either trucked in or hooked up to nearby public connections, similar to as described for the 2024 Final EIS preferred alternative in Section 3.6.2.3 of the 2024 Final EIS. 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.

Surface Water

Alternative 1 could result in short-term, minor, adverse, and indirect impacts to downstream surface waters 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, including those potentially contaminated by spills, could travel offsite and adversely affect water quality in offsite surface waters, notably the unnamed wash that flows north of the project area and through the western portion of the project area. Contaminants would ultimately travel to the Whitewater Draw. Similar to as described for groundwater, GSA would implement appropriate measures to prevent any contamination from spills, such as that arising from hazardous materials used during construction or accidental releases of petroleum from construction equipment (see Section 3.9, Human Health and Safety).

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. Conditions of this permit require development of appropriate documentation (i.e., NOI, site map, Stormwater Pollution Prevention Plan, signed certification statement, post-construction documentation, and payment of fees). A Stormwater Pollution Prevention Plan 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 of the 2024 Final EIS. New development would also be required to comply with the terms of the City of Douglas new development stormwater requirements outlined in the City of Douglas Stormwater Management Plan (City of Douglas 2023), which requires designing, implementing, and maintaining post-construction stormwater controls to reduce or eliminate the discharge of pollutants from their project area. The project is required to have the CGP 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.

Floodplains

Alternative 1 would result in long-term, minor, beneficial, direct and indirect impacts to floodplains. The project area contains approximately 0.75 acre within the 1-percent-annual-chance floodplain and 2.96 acre within the 0.2-percent-annual-chance floodplain associated with the existing stormwater channel segment (i.e., the regulatory floodway) and segments of the proposed utility upgrades. The existing segment of the stormwater channel would be removed, and the Rose Avenue channel would be realigned to flow directly to the west rather than turning north before discharging into the unnamed wash, as shown in Figure 3.6-2. This could result in the removal of existing Special Hazard Flood Areas associated with the existing stormwater channel segment to be removed, and the establishment of new Special Hazard Flood Areas associated with the proposed stormwater channel. GSA would evaluate the project during design to determine if the project would result in a change to the base-flood elevations or floodways and would prepare a CLOMR for the City of Douglas and FEMA to review and approve, as applicable. Final design of the proposed realigned Rose Avenue channel segment and new stormwater basin would be conducted in accordance with GSA Interim Core Building Standards as well as by the authority having jurisdiction and would consider local floodplain ordinance requirements as outlined in the City of Douglas's ordinance (*Section 15.20, Floodplain Management Plan*) (City of Douglas 2024). The proposed stormwater channel would be designed to accommodate the 1-percent-annual chance base flood but would consider the 0.2-percent-annual-chance base flood during design. Realignment of the segment of the Rose Avenue channel is expected to address capacity issues within the unnamed wash which receives discharge from the regulatory floodway, as well as points from the north and east, such that flooding issues in this area and at the RHC LPOE would be improved. Therefore, realignment of the Rose Avenue channel segment is not anticipated to affect the floodplain's capacity to store water or result in the potential to further expand the floodplain or increase the spread or intensity of a flood event. Final design of the new stormwater basin would also incorporate standard measures, including those specified in the GSA Interim Core Building Standards as well as by the authority having jurisdiction. This would reduce or manage stormwater flows and thus impacts to the floodplain and from flooding on the expanded and modernized RHC LPOE and surrounding buildings. 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.

Construction associated with electrical, sanitary sewer, and fiber optic line upgrades would consist of either buried utility lines or, for electrical, aboveground pole-mounted lines within existing or newly established rights-of-way. Buried utilities would not decrease flood storage capacity or otherwise increase flood risk; aboveground electrical lines would only result in negligible adverse impacts to the floodplain which would be expected to be offset by the other flood control and stormwater management improvements associated with the project.

Per the eight-step decision-making process for floodplain management, as outlined in GSA's *Floodplain Management Desk Guide* (GSA 2023), GSA prepared a Floodplain Assessment and Statement of Findings (see Appendix D). The Proposed Action for the 2024 Final EIS was designated as a "critical" action which specifies additional elevation requirements for buildings and other infrastructure.

The remainder of the project area is not located in the 1-percent-annual-chance or 0.2-percent-annual-chance floodplains and no impacts to floodplains from construction in these areas are anticipated.

Wetlands and Waters of the U.S.

As stated in Section 3.6.1, approximately 2,400 linear feet of mapped riverine features associated with the unnamed wash occur within the project area, and approximately 870 feet are associated with the existing stormwater channel proposed for demolition. GSA will survey the project area to assess for the presence of wetlands and WOTUS within the project area and potential impacts, and updates will be included with the Final SEIS. In the event of any encroachment resulting in fill of any WOTUS, coordination with the USACE would be conducted, including any 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

Operations of Alternative 1 would result in long-term, minor, beneficial, and direct impacts to surface waters as a result of altered hydrology in the segment of the unnamed wash north of the project area between the existing and proposed discharge location (see Figure 3.6-2) due to diversion of stormwater flows. As previously discussed, realignment of the Rose Avenue channel segment is expected to address capacity issues within the unnamed wash which receives discharge from the regulatory floodway, as well as points from the north and east, such that flooding issues in this area and at the RHC LPOE would be improved. Diversion of flow would reduce some, although not all of the periodic flow into this segment of the unnamed wash, as flow would continue to periodically discharge into the wash segment from stormwater channels from the north and east following rain events. During a 100-year storm event, approximately 600 cubic feet per second would be conveyed in the realigned Rose Avenue channel segment; during the 500-year storm event, approximately 789 cubic feet per second would be conveyed in the realigned Rose Avenue channel segment. These flow amounts would also represent the approximate decrease in flow through in the segment of the unnamed wash north of the project area between the existing and proposed discharge location. Further, realignment of the Rose Avenue channel segment could slightly reduce the intensity of flooding occurring where the unnamed wash crosses into Mexico as a result of closed flood gates along the border barrier infrastructure. This would be due to the diversion of existing stormwater contributing to a greater dissipation of flows throughout the wash and slightly reducing the potential for flooding in the surrounding area.

GSA is in the process of conducting hydrology studies to investigate overall changes in flow through the existing and proposed stormwater channels as well as into the unnamed wash, and will provide available updates in the Final SEIS. Further, GSA would coordinate with the International Boundary and Water Commission prior to construction, as necessary, regarding the extent of any diversion of stormwater flows.

Operations of Alternative 1 would also result in long-term, moderate, beneficial, and indirect impacts to surface waters due to improved stormwater management within and near the project area. While Alternative 1 would result in an increase of up to 4 acres of impervious surfaces if the realigned Rose Avenue channel segment is concrete lined, the improved stormwater management facilities would divert stormwater away from and reduce flooding risks at the RHC LPOE, would provide additional stormwater and capacity for the expanded and modernized RHC LPOE, and would be designed to optimize stormwater flow and drainage in the project area. If the proposed channel segment is constructed with rock riprap, which may allow for greater infiltration of stormwater flows and runoff, the only surfaces consisting of impervious materials would be for the CBC stormwater features and a small, approximately 50-foot segment of the stormwater channel where it meets Border Road. This segment of the channel would be concrete-lined to facilitate vehicle access and would result in approximately 0.4 acres of new impervious surfaces. While the demolition of the existing stormwater channel segment would remove approximately 0.5 acres of impervious surfaces; it is anticipated this area would be developed as part of the larger expansion and modernization of the RHC LPOE. The new stormwater basin or other utility upgrades would not create additional impervious surfaces.

There would be no additional subsurface disturbance activities required for operations, other than for occasional repair and maintenance activities. Negligible adverse impacts to water resources are expected from maintenance activities.

3.6.2.4 Impact Reduction Measures

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

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 Alternative 1 and the No Action Alternative, as discussed in Chapter 2. The biological resources that have been identified for consideration in this SEIS are vegetation, wildlife, special status species (including federally listed endangered and threatened species and Tier 1 species of greatest conservation need as identified in the Arizona Wildlife Conservation Strategy [AZGFD 2022]), and migratory birds.

3.7.1 Affected Environment

3.7.1.1 Region of Influence

The biological resources ROI for the 2024 Final EIS is defined in Section 3.7.1.1 of that EIS as the vegetation, wildlife, and special status species within 1,000 feet of the current RHC LPOE, proposed expansion areas, and proposed Commercial LPOE. As shown in Figure 2-1, the 2024 Final EIS ROI contains a portion of the Proposed Action including the area of the proposed demolition of the existing stormwater channel segment that parallels the western side of Pan American Avenue between East 3rd Street and the southern end of the existing RHC LPOE, a portion of the area proposed for realignment of a segment of the Rose Avenue channel, and a portion of the proposed stormwater basin. The Proposed Action's ROI includes these portions of the 2024 Final EIS ROI as well as all land located within the Proposed Action's limits of disturbance, located both to the east and west of the RHC LPOE Expansion and Modernization Project Area (see Figure 2-1). The ROI for biological resources also includes vegetation, wildlife, special status species, and migratory birds within 1,000 feet of these areas.

3.7.1.2 Regulatory Setting and Requirements

Section 3.7.1.2 of the 2024 Final EIS discusses the regulatory setting and requirements for biological resources that also apply to the Proposed Action, and is incorporated herein by reference. This includes the description of the ESA, critical habitat, the Arizona State Wildlife Action Plan, the Bald and Golden Eagle Protection Act (BGEPA), and the Migratory Bird Treaty Act (MBTA).

3.7.1.3 Existing Conditions

Vegetation

The ROI for the Proposed Action is comprised of similar vegetation as described in Section 3.7.1.3 of the 2024 Final EIS, which is incorporated herein by reference. The project area is located within the Madrean Archipelago ecoregion, which is characterized by areas of desert scrub and semi-desert grasslands (Griffith et al. 2014).

Invasive species with the potential to occur within the ROI are described in Section 3.7.1.3 of the 2024 Final EIS; in addition to the species listed therein, Buffelgrass (*Pennisetum ciliare*) may have the potential to occur within the ROI (NatureServe 2025a).

Wildlife

The ROI for the Proposed Action is expected to provide habitat for similar wildlife species as described in Section 3.7.1.3 of the 2024 Final EIS, which is incorporated herein by reference. Wildlife species likely to be present in the project area are typical of those found in semidesert grassland.

Special Status Species

The Information for 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 seven federally threatened or endangered species: one mammal, one bird, one amphibian, three fish, and one plant species

(USFWS 2025). USFWS has designated critical habitat for six of these species; however, no critical habitat for any of these listed species occurs within or near the ROI. Table 3.7-1 includes a brief assessment of each federally listed species' likelihood of occurrence in the ROI based on the species' range, distribution, and habitat requirements.

In addition, the Arizona Game and Fish Department (AZGFD) provided a scoping comment on November 4, 2024 (see Appendix A) which included a database query of the Arizona Environmental Online Review Tool that identified species of greatest conservation need with potential to occur within 3 miles of the project area. This tool identified three federally protected species (one mammal, one bird, and one fish) in addition to those identified in the USFWS IPaC, and those species have been included for consideration in Table 3.7-1. All species with federal protections also have a Tier 1 species of greatest conservation need designation. Table 3.7-2 lists the species with only state protection (i.e., Tier 1 species of greatest conservation need only) that have potential to be found within the ROI and provides a brief assessment of each species' likelihood of occurrence in the ROI based on the species' range, distribution, and habitat requirements.

Migratory Birds

Per the USFWS IPaC results (USFWS 2025), two species of migratory birds of conservation concern are expected to occur within the ROI (broad-tailed hummingbird [*Selasphorus platycercus*] and phainopepla [*Phainopepla nitens lepida*]). In addition, based on a review of an Arizona Environmental Online Review Tool query provided by the AZGFD attached to a November 4, 2024 scoping letter (see Appendix A), 46 migratory bird species with protection under the MBTA were identified with potential to occur in the project area as shown in Table 3.7-3. As noted in the AZGFD scoping letter, breeding season for birds (including raptors) in the vicinity of the project is generally January through the end of June.

A species with particular potential to occur within the project area as noted by AZGFD is the western burrowing owl. This species is known to occupy a range of habitats, including open, treeless areas within grassland, steppe, and desert biomes, as well as vacant undeveloped lots. Western burrowing owls generally nest in existing burrows, such as those dug by prairie dogs or other fossorial species, or human-made structures such as culverts and pipes (Gervais et al. 2008; Poulin et al. 2011).

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

Species	Federal Status	Habitat	Expected to Occur Within ROI of Project Area?
Jaguar (*Panthera onca*)	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, including the mountains of the desert southwest in the U.S., and are known to pass through areas close to the U.S. – Mexico border on rare occasions. The border fence between the U.S. and Mexico impedes movement of this species, although openings in the border wall, including seasonal openings such as flood gates, can act as funnels for movements. A flood gate is located within the project area, although it is located in close proximity to the developed areas of Agua Prieta. Jaguars are much more likely to be found in secluded areas with cover away from human activity, particularly in mountainous areas. The proximity of the ROI to the City of Douglas and Agua Prieta to the south and associated development, presence of regular human activity (e.g., CBP), and lack of suitable cover zone for traveling jaguars make it highly unlikely to encounter a jaguar within the ROI. Jaguars have not been documented within close proximity to the City of Douglas. A review of the Jaguar Observation Database identified no observations of jaguars within 30 miles of the ROI. The nearest sightings have been in the Chiricahua Mountains to the north.
Ocelot[a] (*Leopardus pardalis*)	Endangered	Ranges from savanna, shrubland, chaparral, woodland, and riverine scrub. Dens are typically in caves, hollow trees, or thickets.	Unlikely. While the ROI exists within this species' range, ocelots are more likely to be found in secluded areas with cover away from human activity, particularly in mountainous areas. The ROI is generally disturbed and consists of low-quality habitat. In addition, the proximity of the ROI to the City of Douglas and Agua Prieta to the south, associated development, and presence of regular human activity (e.g., CBP) make it highly unlikely to encounter an ocelot within the ROI.
Mexican spotted owl[a] (*Strix occidentalis lucida*)	Threatened	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.
Yellow-billed cuckoo (*Coccyzus americanus*)	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. There is an unnamed wash located within the ROI, but it is dry most of the year. However, this species is migratory, and it is possible that individuals may pass through the ROI, stopping to rest or forage.

Species	Federal Status	Habitat	Expected to Occur Within ROI of Project Area?
Chiricahua leopard frog (*Rana chiricahuensis*)	Threatened	Springs, pools, lakes, reservoirs, streams, and rivers.	No. There is no suitable habitat within the ROI. Per informal consultation with the USFWS dated December 16, 2022 (see Appendix B of the 2024 Final EIS), the most proximate known location for this species is located 7 miles from the proposed Commercial LPOE site, which is approximately 5 miles west of the project area. This species does not generally disperse over these distances. Further, the potential connecting habitats are occupied by bullfrogs and not useable as dispersal mechanisms for the Chiricahua leopard frog. A copy of USFWS correspondence with these findings is included in Appendix B of the 2024 Final EIS.
Gila Topminnow (incl. Yaqui) (*Poeciliopsis occidentalis*)	Endangered	Small to medium rivers with medium to slow currents over gravel/sand substrates.	No. There is no suitable habitat within the ROI. The ROI contains an unnamed wash that is dry most of the year.
Beautiful Shiner (*Cyprinella formosa*)	Threatened	Small to medium streams and ponds.	No. There is no suitable habitat within the ROI. The ROI contains an unnamed wash that is dry most of the year.
Yaqui catfish (*Ictalurus pricei*)	Threatened	Small to medium rivers with medium to slow currents over gravel/sand substrates.	No. There is no suitable habitat within the ROI. The ROI contains an unnamed wash that is dry most of the year.
Yaqui chub (*Gila purpurea*)	Endangered	Deep pools in creeks, springheads, and other stream-associated quiet waters.	No. There is no suitable habitat within the ROI. The ROI contains an unnamed wash that is dry most of the year.
Arizona Eryngo *(Eryngium sparganophyllum)*	Endangered	Perennially moist, organic soils found in spring-fed aridland ciénegas, or wetlands supported by adequate groundwater.	No. There is no suitable habitat within the ROI. The ROI does not contain any ciénega wetlands, which this species requires.

Source: USFWS 2025; Wildlife Conservation Society 2025

[a.] Species not included on USFWS IPaC but considered based on results of an Arizona Environmental Online Review Tool Report query.

EIS = Environmental Impact Statement; LPOE = Land Port of Entry; ROI = Region of Influence; U.S. = United States; USFWS = United States Fish and Wildlife Service

Note: IPaC identified one other additional species within the ROI: northern Aplomado falcon (*Falco femoralis septentrionalis*; experimental or non-essential). However, this species does 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 SEIS.

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

Species	Habitat	Expected to Occur Within ROI of Project Area?
Black-tailed prairie dog (*Cynomys ludovicianus*)	Dry, flat, or gently sloping, open grassland with low, relatively sparse vegetation. Fine to medium textured soils are preferred for their burrows.	Possible. Potentially suitable grassland habitat may exist within the ROI.
Lesser long-nosed bat (*Leptonycteris yerbabuenae*)	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.
Pale Townsend's big-eared bat (*Corynorhinus townsendii pallescens*)	Conifer and deciduous forests, areas with a mosaic of grassland and woodland and shrubland.	Unlikely. Although the ROI contains small portions of grassland and shrubland along the unnamed wash, the ROI does not contain larger conifer and deciduous trees, is generally disturbed from past and ongoing human activity in the area, and is not considered high-quality foraging habitat.
American peregrine falcon (*Falco peregrinus anatum*)	Various open habitats. Nests in places with a wide view and near water.	Possible. ROI is within species' range.
Gila monster (*Heloderma suspectum*)	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.
Lowland leopard frog (*Rana yavapaiensis*)	Rocky streams in canyon habitats surrounded by conifer forests or ponds and stream polls, usually in areas of scrub desert.	No. The ROI contains an unnamed wash that is dry most of the year and this species requires consistent water sources. In addition, the ROI does not contain any canyons or conifer forests, which this species prefers.
Plains leopard frog (*Rana blairi*)	Streams, ponds, creeks, pools, reservoirs, irrigation ditches, and marshes in areas of prairie and desert grassland, farmland, and canyons.	No. The ROI contains an unnamed wash that is dry most of the year and this species requires consistent water sources.
Desert box turtle (*Terrapene ornata luteola*)	Desert grassland and shrubland. Prefers arid and open prairie areas.	Possible. Potentially suitable grassland habitat may exist within the ROI.
Ornate box turtle (*Terrapene ornata*)	Prairie grassland, pasture, fields, sandhills, and open woodland, especially in areas with sandy soil.	Possible. Potentially suitable grassland habitat may exist within the ROI.

Source: AZGFD 2022; AZDFG 2024; NatureServe 2025b

ROI = Region of Influence

Note: Tier 1 Arizona species of greatest conservation need that are also federally listed are included in Table 3.7-1.

Table 3.7-3. Migratory Bird Species with Potential to Occur in the ROI

Species	
American Kestrel (*Falco sparverius*)	Hooded Oriole (*Icterus cucullatus*)
American Peregrine Falcon (*Falco peregrinus anatum*)	Inca Dove (*Columbina inca*)
Arizona Botteri's Sparrow (*Peucaea botterii arizonae*)	Lincoln's Sparrow (*Melospiza lincolnii*)
Arizona Grasshopper Sparrow (*Ammodramus savannarum ammolegus*)	Loggerhead Shrike (*Lanius ludovicianus*)
Band-tailed Pigeon (*Patagioenas fasciata*)	Long-eared Owl (*Asio otus*)
Bendire's Thrasher (*Toxostoma bendirei*)	Mexican Spotted Owl (*Strix occidentalis lucida*)
Brewer's Sparrow (*Spizella breweri*)	Mourning Dove (*Zenaida macroura*)
Broad-billed Hummingbird (*Cynanthus latirostris*)	Prairie Falcon (*Falco mexicanus*)
Bullock's Oriole (*Icterus bullockii*)	Rufous-winged Sparrow (*Peucaea carpalis*)
Cactus Wren (*Campylorhynchus brunneicapillus*)	Sagebrush Sparrow (*Artemisiospiza nevadensis*)
Cassin's Finch (*Haemorhous cassinii*)	Savannah Sparrow (*Passerculus sandwichensis*)
Chestnut-collared Longspur (*Calcarius ornatus*)	Scaled Quail (*Callipepla squamata*)
Chihuahuan Raven (*Corvus cryptoleucus*)	Sprague's Pipet (*Anthus spragueii*)
Common Black Hawk (*Buteogallus anthracinus*)	Swainson's Hawk (*Buteo swainsoni*)
Common Nighthawk (*Chordeiles minor*)	Swainson's Thrush (*Catharus ustulatus*)
Costa's Hummingbird (*Calypte costae*)	Thick-billed Kingbird (*Tyrannus crassirostris*)
Elf Owl (*Micrathene whitneyi*)	Vesper Sparrow (*Pooecetes gramineus*)
Ferruginous Hawk (*Buteo regalis*)	Verdin (*Auriparus flaviceps*)
Gambel's Quail (*Callipepla gambelii*)	Western Screech-owl (*Megascops kennicottii*)
Gila Woodpecker (*Melanerpes uropygialis*)	Western Burrowing Owl (*Athene cunicularia hypugaea*)
Golden Eagle (*Aquila chrysaetos*)	Western Grasshopper Sparrow (*Ammodramus savannarum perpallidus*)
Gray Flycatcher (*Empidonax wrightii*)	White-winged Dove (*Zenaida asiatica*)
Harris's Hawk (*Parabuteo unicinctus*)	Yellow-billed Cuckoo (*Coccyzus americanus*)

Source: AZGFD 2024

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 MBTA or BGEPA.

3.7.2.2 No Action Alternative

Under the No Action Alternative, the RHC LPOE Expansion and Modernization Project would be constructed as described in the 2024 Final EIS. However, GSA would not demolish portions of the existing stormwater channel; would not realign a segment of the Rose Avenue channel; would not construct a new stormwater basin; and would not replace or install electrical, sanitary sewer, fiber optic utilities, or any other associated supporting facilities. In addition, no acquisition or establishment of land use agreements would occur on parcels of land proposed for the project. Ongoing flooding would have the potential to cause periodic disturbances to vegetation and habitat, resulting in long-term, intermittent, minor to moderate, adverse direct impacts to biological resources. In addition, impacts to biological resources would also occur from construction and operations of the 2024 Final EIS preferred alternative as described in Section 3.7.2.2 of the 2024 Final EIS, which is incorporated herein by reference.

3.7.2.3 Alternative 1 – Flood Control and Utility Upgrades

Construction

Alternative 1 could result in permanent, moderate, adverse, and direct impacts on biological resources during construction. Construction activities would require ground disturbance, grading, and clearing of up to approximately 33.2 acres in the project area. Digging and other ground disturbance may present opportunities for wildlife to become trapped within excavated areas, particularly when these areas are not immediately backfilled. The introduction of cars, trucks, and heavy machinery could also result in the mortality of a limited number of less-mobile species. In addition, construction activities would remove existing vegetation and therefore result in the alteration of the existing ecological community, as well as contribute to minor habitat fragmentation from permanent habitat removal. This may cause minor alteration

of foraging, nesting, roosting, or prey availability in the area, including for western burrowing owl and other bird species protected under the MBTA or the BGEPA. The project area is primarily undeveloped, although it does not represent high-quality native habitat for most local species as it is previously disturbed from historical use and ongoing activities (i.e., CBP patrols). The site also contains existing utilities, roadways and unpaved trails, as well as construction debris piles and other discarded waste, and is directly adjacent to other developed sites (i.e., commercial sites to the north, City of Douglas WWTP and slag piles to the east; see Section 3.9, Human Health and Safety). Therefore, many species that inhabit areas near the project area are expected to be tolerant of humans and vehicle traffic or would be expected to relocate to nearby areas of suitable habitat, minimizing the potential for direct adverse impacts. GSA would implement impact reduction measures as described in Section 3.7.2.4 to minimize or avoid impacts to nesting migratory bird species and wildlife around open trenches and excavated sites within the project area. Following construction, the stormwater basin and other temporarily disturbed areas would be revegetated and maintained as necessary.

Alternative 1 could also result in short-term, moderate, adverse, and indirect impacts to wildlife from human activity, fugitive dust, and noise during construction. Construction would introduce temporarily higher levels of human activity in the project area and adjacent areas. As noted in Section 3.7.2.4 of the 2024 Final EIS, temporary increases in noise levels generated during construction may be up to 54 to 59 A-weighted decibels at 1,000 feet away from the limits of disturbance. The resulting noise, in addition to human presence and dust, during construction activities could deter use or cause displacement of local wildlife, including migratory birds, from the surrounding area. As noted above, construction would occur in undeveloped, previously disturbed areas that do not represent high-quality native habitat for most local species; therefore, most species that inhabit areas near the project area are expected to be tolerant of humans and vehicle traffic or are able to relocate to nearby areas of suitable habitat.

Construction may also present the opportunity for introduction or spread of invasive species during ground disturbance. GSA would implement impact reduction measures as discussed in Section 3.7.2.4 to minimize or avoid impacts from invasive species within the project area.

Operations

Operations of Alternative 1 would result in long-term, minor, adverse, and indirect impacts to wildlife habitat from altered hydrology and diversion of water flows in the segment of the unnamed wash north of the project area between the existing and proposed discharge location (see Figure 2-1). Diversion of flow would reduce some, although not all, of the periodic flow into this segment of the unnamed wash. Flow would continue to periodically discharge into the wash segment from stormwater channels from the north and east following rain events (see Section 3.6, Water Resources). Habitat in this segment of the unnamed wash could be slightly degraded due to decreases in stormwater flows, although is expected to be largely comparable to existing conditions considering that some surface flows would remain. GSA is in the process of conducting hydrology studies to investigate overall changes in flow through the existing and proposed stormwater channels as well as into the unnamed wash, and will provide available updates in the Final SEIS. It is possible diversion of water could improve habitat as the existing channel is known to be experiencing capacity issues resulting in overland flooding in this area, and heavy erosion and scour have been observed along the existing channel banks (see Section 3.5, Geology and Soils and Section 3.6, Water Resources). As noted above, the project area is located near undeveloped but previously disturbed areas that do not represent high-quality native habitat for local species. Further, this riparian habitat area is not known to provide specific habitat for any federally or state protected species (see Tables 3.7-1 and 3.7-2).

The overall volume of water entering the segment of the unnamed wash downstream of the proposed discharge point for the realigned Rose Avenue channel would be comparable to current conditions. Therefore, no impacts are expected to habitat or species utilizing the unnamed wash downstream of the proposed discharge point for the realigned Rose Avenue channel.

During operations, there would be no additional subsurface disturbance, other than for occasional repair and maintenance activities. Negligible, adverse, direct and indirect impacts to biological resources are expected from maintenance activities.

Special Status Species

Table 3.7-4 summarizes the potential direct and indirect effects to special status species that have potential to occur within the ROI under Alternative 1.

Table 3.7-4. Potential Effects to Special Status Species with Potential to Occur in ROI

Species	Status	Potential Impact Rating	Potential Impact Summary
Jaguar (*Panthera onca*)	Federally endangered; Tier 1 Arizona species of greatest conservation need	May affect, not likely to adversely affect	As noted in USFWS concurrence letter for the RHC LPOE Expansion and Modernization Project dated February 28, 2024, it is unlikely jaguars would occur near the existing RHC LPOE or proposed expansion areas as considered in the 2024 Final EIS. Therefore, construction or operation of the Proposed Action would not reduce the overall amount of available suitable habitat. When considered with the implementation of the 2024 Final EIS preferred alternative, overall effects to this species project do not change.
Ocelot[a] (*Leopardus pardalis*)	Federally endangered; Tier 1 Arizona species of greatest conservation need	May affect, not likely to adversely affect	Effects to this species were not considered for the RHC LPOE Expansion and Modernization Project as it was not identified in the USFWS IPaC as having potential to occur within the ROI as defined in the 2024 Final EIS. This species has been included for consideration based on results of an Arizona Environmental Online Review Tool Report query. The ROI for the 2024 Final EIS preferred alternative includes an additional 106 acres and 16.6 acres of Madrean Archipelago desert scrub/semi-desert grassland; however, there is a still a very low probability that ocelots would be encountered in these areas due to the proximity to human development, presence of human activity, lack of suitable cover zone for traveling species, and distance from mountainous areas. Noise levels from construction would be temporary and attenuate such that levels would be consistent with ambient levels beyond 0.5 mile of the project area. The overall project would remove a relatively small amount of low-quality habitat relative to the range of this species. As such, construction and operation would not likely reduce the overall amount of available suitable habitat. Further, GSA would implement measures to avoid, minimize, or offset effects from construction activities. When considered with the implementation of the 2024 Final EIS preferred alternative, the Proposed Action may affect, but would not likely adversely affect this species.

Species	Status	Potential Impact Rating	Potential Impact Summary
Mexican spotted owl[a] (*Strix occidentalis lucida*)	Federally threatened; Tier 1 Arizona species of greatest conservation need	No effect	Effects to this species were not considered for the RHC LPOE Expansion and Modernization Project as it was not identified in the USFWS IPaC as having potential to occur within the ROI as defined in the 2024 Final EIS. This species has been included for consideration based on results of an Arizona Environmental Online Review Tool Report query. The ROI for the 2024 Final EIS preferred alternative is similar to that for the Proposed Action considered in the SEIS and lacks the species' preferred forest habitat. As such, construction and operation would not likely reduce the overall amount of available suitable habitat. Further, GSA would implement measures to avoid, minimize, or offset effects from construction activities. When considered with the implementation of the 2024 Final EIS preferred alternative, no effects to this species are anticipated.
Yellow-billed cuckoo (*Coccyzus americanus*)	Federally threatened; Tier 1 Arizona species of greatest conservation need	May affect, not likely to adversely affect	As noted in USFWS concurrence letter for the RHC LPOE Expansion and Modernization Project dated February 28, 2024, it is unlikely resident cuckoos would occupy the project footprint near the existing RHC LPOE or proposed expansion areas as considered in the 2024 Final EIS. Therefore, due to lack of suitable nesting habitat, this species is not expected to reside within the ROI. As such, construction and operation of the Proposed Action would not reduce the overall availability of nesting habitat or high-quality foraging habitat. To minimize or avoid potential for direct impacts, GSA would implement avoidance and minimization measures to conduct any tree removal outside of the nesting season (i.e., January through June). When considered with the implementation of the 2024 Final EIS preferred alternative, overall effects to this species project do not change.
Chiricahua leopard frog (*Rana chiricahuensis*)	Threatened	No effect	When considered with the implementation of the 2024 Final EIS preferred alternative, no effects to this species are anticipated.
Gila Topminnow (incl. Yaqui) (*Poeciliopsis occidentalis*)	Endangered	No effect	Effects to this species were not considered for the RHC LPOE Expansion and Modernization Project as it was not identified in the USFWS IPaC as having potential to occur within the ROI as defined in the 2024 Final EIS. This species has been included for consideration based on results of an Arizona Environmental Online Review Tool Report query. The ROI for the 2024 Final EIS preferred alternative is similar to that for the Proposed Action considered in the SEIS and only contains unnamed washes that are dry most of the year. As such, construction and operation would not likely reduce the overall amount of available suitable habitat.

Species	Status	Potential Impact Rating	Potential Impact Summary
			When considered with the implementation of the 2024 Final EIS preferred alternative, no effects to this species are anticipated.
Beautiful Shiner (*Cyprinella formosa*)	Threatened	No effect	Effects to this species were not considered for the RHC LPOE Expansion and Modernization Project as it was not identified in the USFWS IPaC as having potential to occur within the ROI as defined in the 2024 Final EIS. This species has been included for consideration based on results of an Arizona Environmental Online Review Tool Report query. The ROI for the 2024 Final EIS preferred alternative is similar to that for the Proposed Action considered in the SEIS and only contains unnamed washes that are dry most of the year. As such, construction and operation would not likely reduce the overall amount of available suitable habitat. When considered with the implementation of the 2024 Final EIS preferred alternative, no effects to this species are anticipated.
Yaqui catfish (*Ictalurus pricei*)	Threatened	No effect	When considered with the implementation of the 2024 Final EIS preferred alternative, no effects to this species are anticipated.
Yaqui chub (*Gila purpurea*)	Endangered	No effect	When considered with the implementation of the 2024 Final EIS preferred alternative, no effects to this species are anticipated.
Arizona Eryngo *(Eryngium sparganophyllum)*	Endangered	No effect	Effects to this species were not considered for the RHC LPOE Expansion and Modernization Project as it was not identified in the USFWS IPaC as having potential to occur within the ROI as defined in the 2024 Final EIS. This species has been included for consideration based on results of an Arizona Environmental Online Review Tool Report query. The ROI for the 2024 Final EIS preferred alternative is similar to that for the Proposed Action considered in the SEIS and does not contain ciénega wetlands, which this species requires. As such, construction and operation would not likely reduce the overall amount of available suitable habitat. When considered with the implementation of the 2024 Final EIS preferred alternative, no effects to this species are anticipated.
Black-tailed prairie dog (*Cynomys ludovicianus*)	Tier 1 Arizona species of greatest conservation need	Minor	The Proposed Action may affect but is not likely to adversely affect this species. Potentially suitable habitat exists within the ROI. This less-mobile species, if present, may experience accidental mortality from the introduction of heavy machinery and commercial traffic in undisturbed areas. Species may experience indirect impacts from increased human activity, noise, and disturbance and removal of vegetation. However, impacts would not

Species	Status	Potential Impact Rating	Potential Impact Summary
			substantially reduce overall habitat regionally available or cause population-level effects.
Lesser long-nosed bat (*Leptonycteris yerbabuunae*)	Tier 1 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.
Pale Townsend's big-eared bat (*Corynorhinus townsendii pallescens*)	Tier 1 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.
American peregrine falcon (*Falco peregrinus anatum*)	Tier 1 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.
Gila monster (*Heloderma suspectum*)	Tier 1 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.
Desert box turtle (*Terrapene ornata luteola*)	Tier 1 Arizona species of greatest conservation need	Minor	The Proposed Action may affect but is not likely to adversely affect this species. Potentially suitable habitat exists within the ROI. This less-mobile species, if present, may experience accidental mortality from the introduction of heavy machinery and commercial traffic in undisturbed areas. Species may experience indirect impacts from increased human activity, noise, and disturbance and removal of vegetation. However, impacts would not substantially reduce overall habitat regionally available or cause population-level effects.
Ornate box turtle (*Terrapene ornata*)	Tier 1 Arizona species of greatest conservation need	Minor	The Proposed Action may affect but is not likely to adversely affect this species. Potentially suitable habitat exists within the ROI. This less-mobile species, if present, may experience accidental mortality from the introduction of heavy machinery and commercial traffic in undisturbed areas. Species may experience indirect impacts from increased human activity,

Species	Status	Potential Impact Rating	Potential Impact Summary
			noise, and disturbance and removal of vegetation. However, impacts would not substantially reduce overall habitat regionally available or cause population-level effects.

Source: AZGFD 2024; NatureServe 2025b; USFWS 2025

[a.] Species not included on USFWS IPaC but considered based on results of Arizona Environmental Online Review Tool Report.

EIS = Environmental Impact Statement; GSA = General Services Administration; IPaC = Information for Planning and Consultation; LPOE = Land Port of Entry; RHC = Raul Hector Castro; ROI = Region of Influence; SEIS = Supplemental Environmental Impact Statement; U.S. = United States; USFWS = United States Fish and Wildlife Service

As discussed in Section 1.3.2, GSA previously consulted with USFWS per Section 7 of the ESA to determine effects to federally protected species as part of the 2024 Final EIS and is currently consulting with the USFWS regarding the Proposed Action. GSA would follow all conservation measures recommended by the USFWS for the expansion and modernization of the RHC LPOE and any new measures for this project to minimize potential adverse effects to biological resources, including protected species (see Section 3.7.2.4). USFWS consultation letters are included in Appendix B.

3.7.2.4 Impact Reduction Measures

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

In addition, GSA would implement the following measures:

- An occupancy survey would be conducted to determine if any western burrowing owls are present within the project area in accordance with the *Burrowing Owl Project Clearance Guidance for Landowners* (AZGFD 2009). The survey would be conducted by a surveyor who is certified by AZGFD or has similar training and qualifications. If an active burrowing owl burrow is detected, GSA would contact AZGFD and USFWS for further direction.
- To the extent practicable, vegetation clearing or trimming would be avoided in the project area during the migratory bird nesting season (generally between January and June). If clearing or trimming is required during the nesting season, surveys would be conducted by a qualified biologist to determine if any nesting birds occur in the project area prior to removal or trimming of vegetation. If nesting birds are present, removal or trimming of the vegetation would be delayed until after nesting season, or GSA would coordinate with the USFWS for additional technical assistance in complying with the MBTA.
- To the extent practicable, the amount of time any open trench or large hole is left open would be minimized. When trenches or large holes cannot be backfilled immediately, escape ramps (e.g., short lateral trenches or wooden planks sloping to the surface) would be installed in each hole and at least every 295 feet (90 meters) in a trench. Slopes would be less than 45 degrees and trenches and holes that have been left open would be inspected to remove any wildlife prior to backfilling.
- Pre-construction presence/absence surveys for any bald or golden eagles would be completed to determine if there is a need to remove potentially suitable habitat within the project area. Surveys would be conducted pursuant to local USFWS field office requirements. The need for any restrictions around tree clearing, if any, would be determined in coordination with applicable federal resource agencies pending survey results. If the project is determined to have potential to disturb or kill bald or golden eagles, GSA would obtain a permit under the BGEPA.
- Use drought-resistant native vegetation for landscaping around the new stormwater basin.

3.8 INFRASTRUCTURE AND UTILITIES

This section describes the baseline conditions for infrastructure and utilities within and surrounding the project area and assesses the potential for existing infrastructure and utilities within the project area to affect or be affected by implementing the Proposed Action, including Alternative 1 and the No Action Alternative, as discussed in Chapter 2. In this section, infrastructure refers to the regional roadway network at or near the project area; utilities refer to the water, sanitary sewer, stormwater, natural gas, electrical, and communications systems at or near the project area.

3.8.1 Affected Environment

3.8.1.1 Region of Influence

The infrastructure and utilities ROI for the 2024 Final EIS is defined in Section 3.10.1.1 of that EIS and includes infrastructure and utilities (i.e., water, sanitary sewer, stormwater, natural gas, electric, and communications systems) utilized by the RHC LPOE and any other infrastructure and utilities located on or adjacent to the RHC LPOE and proposed Commercial LPOE. As shown in Figure 2-1, the 2024 Final EIS ROI contains a portion of the Proposed Action including the area of the proposed demolition of the existing stormwater channel segment that parallels the western side of Pan American Avenue between East 3rd Street and the southern end of the existing RHC LPOE, and a portion of the area proposed for realignment of a segment of the Rose Avenue channel. The Proposed Action's ROI includes these portions of the 2024 Final EIS ROI as well as all land within the Proposed Action's limits of disturbance, located both to the east and west of the RHC LPOE Expansion and Modernization Project Area (see Figure 2-1).

3.8.1.2 Regulatory Setting and Requirements

Section 3.10.1.2 of the 2024 Final EIS discusses the regulatory setting and requirements for infrastructure and utilities that also apply to the Proposed Action, and is incorporated herein by reference. This includes the description of Section 438 of the EISA of 2007. In addition, the Proposed Action would be subject to the City of Douglas Code, which requires stormwater basins to retain the entire volume of rainfall associated with a 100-year, 6-hour storm and accumulated stormwater to be released at a designated rate.

3.8.1.3 Existing Conditions

Roadway Networks

Section 3.10.1.3 of the 2024 Final EIS includes a discussion of roadway networks in the vicinity of the project area, and is incorporated herein by reference. An additional roadway that is within the project area for the Proposed Action is a section of Chino Road, which is located between East 3rd Street and Border Road on the western portion of the project area. This section of Chino Road is accessible by the public but is mostly used by CBP personnel. In addition, North Chino Road, the primary access road to the City of Douglas WWTP, is located within the project area proposed for the sanitary sewer utility upgrades.

Water and Sanitary Sewer

Section 3.10.1.3 of the 2024 Final EIS includes a discussion of the existing conditions of water and sanitary sewer in the vicinity of the project area, and is incorporated herein by reference. This includes information on water consumption, wastewater treatment, and system capacities relevant to the RHC LPOE. In addition to the water and sanitary sewer utilities discussed in the 2024 Final EIS, existing sanitary sewer lines are located throughout the project area (see Figure 2-1). These sanitary sewer lines transport wastewater from the existing RHC LPOE and properties to the east of the port to the City of Douglas WWTP. In addition, an 8-inch potable water line is located within the project area.

Stormwater

Section 3.10.1.3 of the 2024 Final EIS includes a discussion of the existing conditions for stormwater management facilities in the vicinity of the project area, and is incorporated herein by reference. This

includes discussion of stormwater utilities within the 2024 Final EIS preferred alternative project area. Differences from the 2024 Final EIS include updates to the City of Douglas's regulatory status under the Phase II MS4 permit; as of April 2024, the City of Douglas is no longer regulated under this permit. See Section 3.6.1.3 for additional information regarding the permit termination.

Despite this change in regulatory status, the City of Douglas continues to manage stormwater through its existing facilities. Stormwater is collected through a system separate from the sanitary sewer system and is discharged untreated into Whitewater Draw, with the outfall location approximately 2.6 miles northwest of the RHC LPOE (City of Douglas 2023).

A segment of the Rose Avenue channel proposed for demolition and realignment is located within the project area, including the existing discharge point into an unnamed wash near the intersection of East 3rd Street and Pan American Avenue. The Rose Avenue channel is a concrete lined, open stormwater channel that originates east of the RHC LPOE and collects stormwater from eastern sections of the City of Douglas. The existing channel begins at 15th Street west of North Louis Avenue, travels south as an unlined channel, turns southwest near 6th Green Street towards the U.S. – Mexico border, and then parallels the border as a concrete-lined channel for approximately 1.2 miles before reaching the RHC LPOE (see Figure 3.8-1). The existing channel moves underground at the RHC LPOE, passing beneath the commercially-owned vehicle and POV inbound traffic lanes. The existing channel re-emerges immediately west of the RHC LPOE, makes a 90-degree turn, and continues northward along the western side of Pan American Avenue until it discharges into an unnamed wash located north of the RHC LPOE, just south of the intersection of East 3rd Street and Pan American Avenue. The unnamed wash collects other stormwater flow from the north and east, flows east-to-west south of East 3rd Street, and eventually turns south near Chino Road before emptying into the Whitewater Draw in Mexico (see Section 3.6, Water Resources). Representative photos of the existing Rose Avenue channel within the project area are included in Figures 3.8-2 and 3.8-3.

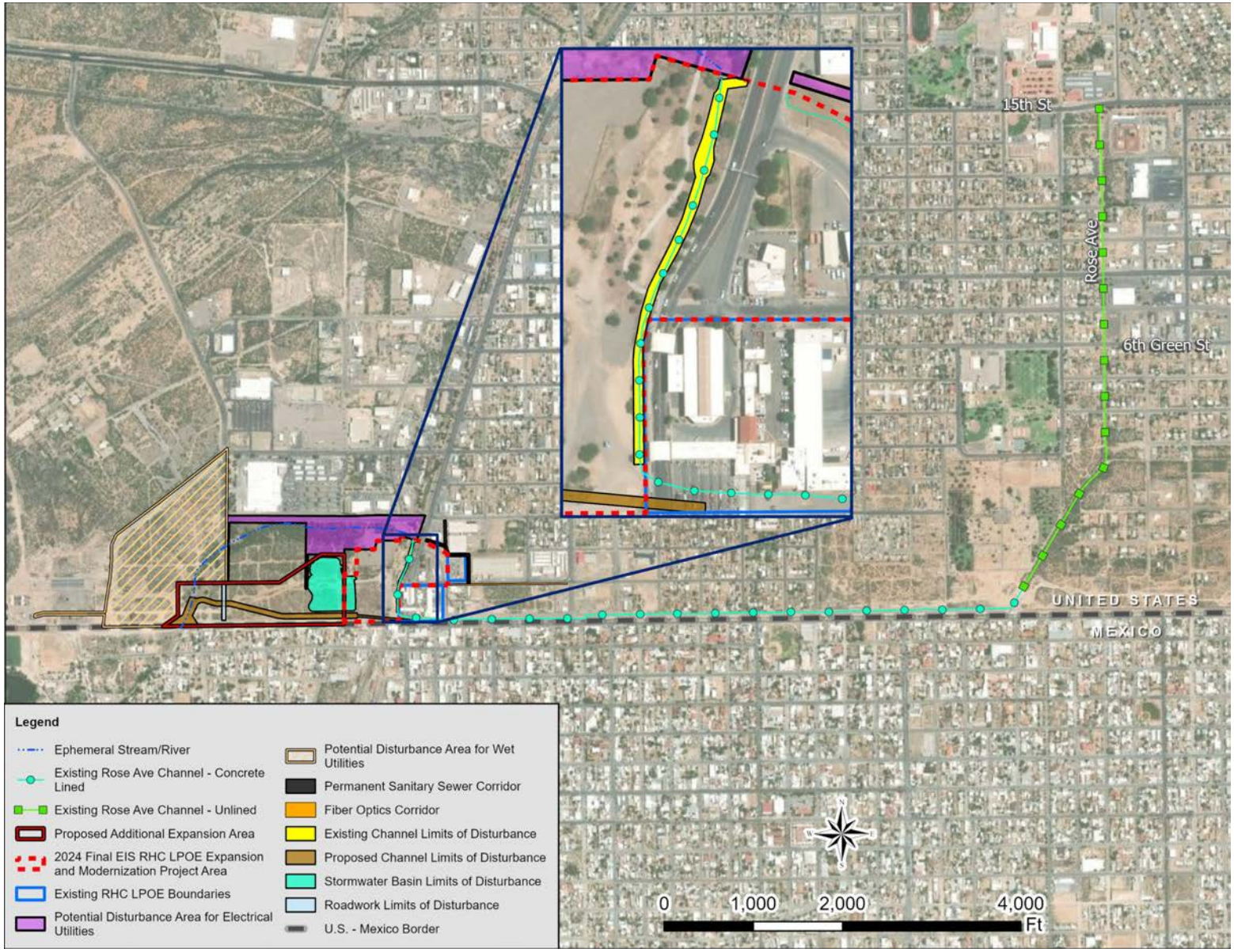


Figure 3.8-1. Existing Rose Avenue Channel Alignment

Figure 3.8-2. Existing Rose Avenue Channel Alignment parallel to Pan American Avenue, facing South

Figure 3.8-3. Existing Rose Avenue Channel Alignment parallel to Pan American Avenue, facing North

Several storm drains connect to the Rose Avenue channel throughout the existing RHC LPOE, including (GSA 2024c):

- The south side of the commercial facility
- The pedestrian processing building
- The inbound and outbound canopies
- Along 1st Street and at its intersection with Pan American Avenue

Natural Gas/Electrical

Section 3.10.1.3 of the 2024 Final EIS includes a discussion of the existing natural gas and electrical infrastructure in the vicinity of the project area, and is incorporated herein by reference. An overhead powerline was observed within the project area during the Phase I Environmental Site Assessment conducted for this project (GSA 2025).

Communication Systems

Section 3.10.1.3 of the 2024 Final EIS includes a discussion of the existing communications providers in the vicinity of the project area, and is incorporated herein by reference. Based on correspondence with Border Patrol, a fiber optic line is located within the project area (I. Smith, personal communication, November 20, 2024).

3.8.2 Environmental Consequences

3.8.2.1 Methodology

To evaluate the impacts on infrastructure and utilities, 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 infrastructure and utilities 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.

3.8.2.2 No Action Alternative

Under the No Action Alternative, the RHC LPOE Expansion and Modernization Project would be constructed as described in the 2024 Final EIS. However, GSA would not demolish portions of the existing stormwater channel; would not realign a segment of the Rose Avenue channel; would not construct a new stormwater basin; and would not replace or install electrical, sanitary sewer, fiber optic utilities, or any other associated supporting facilities. In addition, no acquisition or establishment of land use agreements would occur on parcels of land proposed for the project. Long-term, moderate, adverse, and indirect impacts to infrastructure and utilities would be anticipated. Site conditions would remain as they currently exist and no construction activities would occur within the project area; however, the overall stormwater management and flood control needs for the expanded and modernized RHC LPOE would not be addressed, stormwater flow would not be diverted, and engineering conflicts between the current alignment of the Rose Avenue channel and the proposed RHC LPOE Expansion and Modernization Project layout would remain. Stormwater utilities for the expanded and modernized RHC LPOE would be inadequate and there would be additional strain on the existing and surrounding utilities. This would increase flood potential at the expanded and modernized RHC LPOE and surrounding area, increasing risks that the RHC LPOE could be partially shutdown or impacted during a storm event, impeding the LPOE's functionality, and jeopardizing the security and safety at the RHC LPOE. Without upgrades to electrical, sanitary sewer, and fiber optic utilities, the RHC LPOE Expansion and Modernization Project would not have sufficient utility capacity or

necessary utility requirements to achieve compliance with CBP design requirements, lessening the port's operational efficiency and its ability to support the CBP mission. In addition, impacts to infrastructure and utilities would also occur from construction and operations of the 2024 Final EIS preferred alternative as described in Section 3.10.2.2 of the 2024 Final EIS, which is incorporated herein by reference.

3.8.2.3 Alternative 1 – Flood Control and Utility Upgrades

Construction

Alternative 1 would result in short-term, minor, adverse, and direct impacts on roadway infrastructure. This would occur on Chino Road during the installation of a new three barrel 8-foot by 4-foot CBC where the proposed realignment of a segment of the Rose Avenue channel crosses the road, as well as for a new manhole and realignment of the sanitary sewer line. In addition, construction may be required along roadway segments in the project area (e.g., North Chino Road, 1st Street, 3rd Street, Border Road, and roadway access to the WWTP) depending on final utility alignment. Alternative 1 would include repairing portions of roadways impacted by the improvements, as appropriate.

Alternative 1 would result in short-term, minor, adverse, and indirect impacts to utilities within the project area due to an increased potential for intermittent interruptions in service. Various utilities are located within and near the project area as described in Section 3.8.1.3. To avoid or limit the potential for utility service interruptions, existing utility maps would be reviewed, and utility companies would be contacted in advance of construction to identify any locations where utility lines could be affected. Measures would be implemented as necessary to protect existing utility lines or arrange for their temporary or permanent relocation as needed, and otherwise ensure service is maintained. This would include lowering a segment of the 8-inch potable waterline that is located in close proximity to the proposed new CBC near Chino Road, and installing a temporary extension of a sanitary sewer line on the west side of the project area to avoid conflicts with the realigned Rose Avenue channel segment.

During construction, there would be short-term, negligible, adverse, and indirect impacts on water demand due to increased use for dust control and other construction-related activities. Similarly, a temporary and negligible increase in demand for wastewater services is anticipated from construction activities, such as from the use of portable toilets.

All construction work for proposed utility upgrades would be conducted primarily within existing or newly established rights-of-way (estimated at approximately 25 feet wide for electrical and sanitary sewer, and 15 feet wide for fiber optics) and would connect to utility lines owned and operated by the City of Douglas or local utility providers.

Operations

No impacts to infrastructure are anticipated from operations of Alternative 1.

Operations of Alternative 1 would result in permanent, minor, beneficial, and direct impacts on sewer utilities as a result of upgraded sewer system capacity. The Proposed Action would include installation of up to approximately 300 feet of new line to the north of the expanded and modernized RHC LPOE and approximately 4,400 feet of line north and west of Chino Road to connect to the city of Douglas WWTP, both of which would tie into new and existing lines.

Alternative 1 would also result in permanent, moderate, beneficial, and direct impacts on stormwater management facilities in the vicinity of the RHC LPOE. Alternative 1 would result in the construction of an upgraded stormwater drainage system which would be designed to optimize stormwater flow and drainage in the project area, as well as improve overall capacity and resilience of surrounding utilities, thus reducing the potential risk of flooding in the area. The proposed stormwater channel alignment would provide a more efficient, straight-line path for water flow compared to the current drainage pattern which must make a 90 degree turn and travel north before discharging. The new stormwater management facilities would be built and maintained to current engineering standards and industry standard protocols as well as

applicable regulations and ordinances, supporting improved efficiency of stormwater conveyance and temporary storage. Facilities constructed under Alternative 1 would guide stormwater away from critical facilities near the RHC LPOE and Pan American Avenue, directing it further west towards to the proposed new discharge point as shown in Figure 2-1.

Alternative 1 would result in permanent, moderate, beneficial, and direct impacts to electrical infrastructure through the replacement or installation of approximately 6,500 feet of electrical lines. The existing overhead electrical power line that parallels Pan American Avenue just north of the existing RHC LPOE would be removed and re-routed as part of the Proposed Action. Additionally, a section of the power line extending east-west that provides power to the WWTP west of Chino Road would be removed. To maintain and improve electrical service, new power lines would be installed across the northern, western, and eastern portions of the project area. Newly installed electrical lines may consist of either aboveground pole-mounted lines, buried lines, or a combination of both. Electrical lines would service the expanded and modernized RHC LPOE from both sides of the LPOE and would provide increased redundancy of service.

Alternative 1 would result in permanent, minor, beneficial, and direct impacts to the communications systems through the construction of approximately 1,400 feet of fiber optic lines to the east of the RHC LPOE.

Maintenance of the proposed stormwater channel segment, new stormwater basin, and other proposed utility upgrades would be required to ensure their continued effectiveness. This would include periodic inspections, debris removal, and potential sediment management for the stormwater facilities, and routine checks and repairs of the electrical, sanitary sewer, and fiber optic lines.

3.8.2.4 Impact Reduction Measures

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

- Prioritizing native plant species when introducing new vegetation. For the Proposed Action, this could include using native, drought-resistant vegetation around the new stormwater basin to reduce maintenance needs and enhance water conservation.
- To avoid or limit the potential for utility service interruptions, existing utility maps would be reviewed, and utility companies would be contacted in advance of construction to identify any locations where utility lines could be affected.
- Implement a maintenance plan that includes regular inspections and cleaning of the stormwater management facilities to ensure its continued effectiveness.

3.9 HUMAN HEALTH AND SAFETY

This section describes the baseline conditions for human health and safety, and assesses the potential for direct and indirect factors that have the potential to affect the human population or workers associated with implementing the Proposed Action, including Alternative 1 and the No Action Alternative, 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.

3.9.1 Affected Environment

3.9.1.1 Region of Influence

The human health and safety ROI for the 2024 Final EIS is defined in Section 3.13.1.1 of that EIS and includes the RHC LPOE, the proposed Commercial LPOE site, and proposed expansion areas. As shown in Figure 2-1, the 2024 Final EIS ROI contains a portion of the Proposed Action including the area of the proposed demolition of the existing stormwater channel segment that parallels the western side of Pan American Avenue between East 3rd Street and the southern end of the existing RHC LPOE, and a portion of the area proposed for realignment of a segment of the Rose Avenue channel. The Proposed Action's ROI includes these portions of the 2024 Final EIS ROI as well as all land located within the Proposed Action's limits of disturbance, located both to the east and west of the RHC LPOE Expansion and Modernization Project Area (see Figure 2-1).

3.9.1.2 Regulatory Setting and Requirements

Section 3.13.1.2 of the 2024 Final EIS discusses the regulatory setting and requirements for human health and safety that also apply to the Proposed Action, and is incorporated herein by reference. This includes the following federal regulations that have relevance to human health and safety, to include hazardous materials and waste management: the Comprehensive Environmental Response, Compensation, and Liability Act, also known as Superfund; the Resource Conservation and Recovery Act; the CWA; the CAA; the Occupational Safety and Health Act; and EO 12088, *Federal Compliance with Pollution Control*. This also includes state regulations such as the Arizona Health and Safety Code as well as the Arizona Division of Occupational Safety and Health regulations.

3.9.1.3 Existing Conditions

A Phase I Environmental Site Assessment was prepared in October 2022 which established existing conditions within the 2024 Final EIS preferred alternative project area (GSA 2022). This assessment, which covers part of the project area for the Proposed Action, was performed in accordance with current American Society for Testing and Materials guidelines (E1527-21) and USEPA's *Standards and Practices for All Appropriate Inquiries* (40 CFR 312). Key findings from the 2022 Phase I Environmental Site Assessment (GSA 2022) include:

- Recognized Environmental Condition (REC)-1: Proximity to former Phelps Dodge (PD) smelter site (now owned by Freeport McMoran), which has a history of stack emission rates for particulate matter and sulfur dioxide gas exceeding USEPA NAAQS, and historical soil contamination of lead and arsenic exceeding residential standard reporting limits up to 6 miles offsite, due to particulates and dust being carried offsite by wind. The former PD smelter site, located approximately 1.5 miles west of the RHC LPOE and approximately 0.5 miles west of the project area for the Proposed Action, previously supported a 2,000-acre copper smelting operation which left behind two large slag piles of solid copper ore processing waste and three closed landfills on the property.

- REC-2: The area west of the RHC LPOE was historically used as a cattle holding area, with potential soil contamination from pesticide treatments.
- REC-3: Illicit dumping of construction and demolition debris was observed in this area. Piles of construction debris were observed onsite.
- Historical REC: A former manufactured gas plant site northwest of the RHC LPOE underwent remediation, with a "No Further Action" determination granted by ADEQ in 2022.

Due to the finding of these RECs, a subsequent Phase II Environmental Site Assessment was conducted in March 2023 within the 2024 Final EIS preferred alternative project area to further investigate potential contamination concerns. Soil sampling results demonstrated the following:

- Arsenic levels exceeded ADEQ Non-Residential Soil Remediation Levels (SRLs) in many samples, likely due to naturally occurring background conditions.
- Low levels of toxaphene were detected in two samples, below Non-Residential SRLs.
- Some polycyclic aromatic hydrocarbons and one polychlorinated biphenyl were detected, all below Non-Residential SRLs.

The March 2023 Phase II Environmental Site Assessment concluded that, except for naturally occurring arsenic, no contaminants exceeded Non-Residential SRLs, and no further action was required. See Section 3.13.1.3 of the 2024 Final EIS for a complete description of the Phase I and II Environmental Site Assessment results for the 2024 Final EIS preferred alternative project area as well as additional background on the former PD smelter site.

In August 2023, a Phase I Environmental Site Assessment was conducted for the proposed East Expansion Area (Alternative 3 in the 2024 Final EIS). Part of the utility upgrades proposed in this SEIS overlap with or are directly adjacent to that assessed area, which includes a mix of active and inactive commercial, industrial, and residential properties; open undeveloped land; and access roads. Notable findings from the report related to the existing RHC LPOE and area east of the existing RHC LPOE include:

- The former presence of a dry cleaner upgradient to the east and historic detection of trichloroethylene at the RHC LPOE indicate a potential contamination pathway. Although the RHC LPOE has been remediated and received a No Further Action determination from ADEQ, there is no record of testing for contamination on the proposed expansion areas.
- A former underground storage tank (UST) containing diesel fuel was removed on the eastern portion of the existing RHC LPOE in 1991. Soil and groundwater contamination was remediated, and the site received a formal closure and unrestricted No Further Action determination from ADEQ. A small amount of soil contamination beneath a building at approximately 35 feet depth remains in place, although follow-on sampling has confirmed the contamination has not impacted groundwater.

An additional Phase I Environmental Site Assessment was completed in October 2024 of the project area under consideration for the Proposed Action (GSA 2025). The purpose of the Phase I Environmental Site Assessment was to identify potential environmental concerns related to current and historical activities conducted on or near the project area. This assessment identified potential RECs associated with current and past uses of the property, as defined by the guidelines (E 1527-21) of the American Society for Testing and Materials. The primary findings of the October 2024 Phase I Environmental Site Assessment are as follows:

- The project area is located on previously disturbed, but currently undeveloped land with a single paved road (i.e., Border Road) traversing the south end. During the Phase I Environmental Site Assessment site visit scattered remains of discarded waste were observed throughout the

southwestern portion of the project area near Chino Road, which included a mixture of auto parts and debris, as well as other unidentifiable materials.

- Construction debris piles were observed on the north end of the project area, and appeared to be similar to construction debris piles on the adjacent parcel within the 2024 Final EIS preferred alternative project area as identified in the 2022 Phase I Environmental Site Assessment. These piles were sampled during the previous Phase II ESA sampling event in March 2023, and only arsenic was detected in excess of applicable regulatory thresholds, which was attributed to natural background conditions. Therefore, no further sampling is recommended.
- Future shallow soil sampling for metals analysis is recommended to be conducted across the undeveloped portion of any potential expansion area to inspect for impacts from the former PD smelter site. This recommendation stems from the findings of the 2022 Phase I Environmental Site Assessment, which identified the proximity of the former PD smelter site as a potential source of contamination in the project area due to past stack emissions from the smelting operation exceeding USEPA NAAQS, and associated soil contamination from potential air-ground deposition in the surrounding area. As a result of the project area being closer to the former PD smelter site, additional sampling is recommended to thoroughly assess any potential contamination from historical smelting operations (GSA 2025). These results will be updated in the Final SEIS.

Section 3.13.1.3 of the 2024 Final EIS also discusses security, law enforcement, and emergency services in proximity to the RHC LPOE that have capabilities to manage human health and safety concerns that arise as a result of the Proposed Action, and is incorporated herein by reference.

3.9.2 Environmental Consequences

3.9.2.1 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.

3.9.2.2 No Action Alternative

Under the No Action Alternative, the RHC LPOE Expansion and Modernization Project would be constructed as described in the 2024 Final EIS. However, GSA would not demolish portions of the existing

stormwater channel; would not realign a segment of the Rose Avenue channel; would not construct a new stormwater basin; and would not replace or install electrical, sanitary sewer, fiber optic utilities, or any other associated supporting facilities. In addition, no acquisition or establishment of land use agreements would occur on parcels of land proposed for the project. Long-term, moderate, adverse, and indirect impacts to human health and safety could result due to increased flood potential at the expanded and modernized RHC LPOE and surrounding area. Ongoing maintenance of existing infrastructure and utilities would continue, requiring minimal use of hazardous materials and generating negligible amounts of hazardous waste. In addition, impacts to human health and safety would also occur from construction and operations of the 2024 Final EIS preferred alternative as described in Section 3.13.2.2 of the 2024 Final EIS, which is incorporated herein by reference.

3.9.2.3 Alternative 1 – Flood Control and Utility Upgrades

Construction

Alternative 1 would result in short-term, negligible to minor, adverse, and direct impacts on human health and safety during construction. Risks to the health and safety of personnel and patrons would be comparable to those described in Section 3.13.2.3 of the 2024 Final EIS, which is incorporated herein by reference. 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.

There would be short-term, negligible adverse impacts related to hazardous materials and waste handling during construction. Hazardous materials used during construction would be managed in accordance with federal, state, and local regulations. All wastes including hazardous waste, construction debris, and other waste materials would be removed from the project area and disposed of in accordance with applicable regulations. Landfilled waste would be disposed of at permitted landfills with adequate capacity. In addition, any project-specific hazards affecting workers would be reduced based on strict adherence to Occupational Safety and Health Act 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.

During construction of Alternative 1 soil contamination may be potentially encountered. Given that the western end of the project area is closer to the former PD smelter site, there is an increased potential to encounter contaminated soils in this area. To further investigate potential contamination concerns, GSA will conduct additional shallow soil sampling for metals analysis across the western end of the proposed additional expansion area as shown in Figure 2-1 prior to construction. The results of additional sampling and any necessary mitigation measures will be detailed in the Final SEIS. East of the existing RHC LPOE, the former presence of a dry cleaner and historic detection of trichloroethylene at the RHC LPOE increases the potential to encounter contaminated soils during trenching and excavation for utility corridors. The need for further due diligence in the potential disturbance area for utilities both east and west of the RHC LPOE, as shown in Figure 2-1, would be considered prior to construction. As necessary, GSA and its contractors would adhere to appropriate handling and disposal procedures during construction in accordance with federal regulations to mitigate health risks to workers and the public.

Operations

Operations of Alternative 1 would result in long-term, minor, beneficial, and direct impacts on human health and safety as a result of reduced flood risks in the area from the improved stormwater management facilities, which would enhance public safety during heavy precipitation events. Operations and maintenance activities would be conducted in accordance with applicable safety codes and standards.

Scoping comments have also identified that there have been reported incidents of drownings in the existing Rose Avenue channel during major storm events (see Appendix A). These concerns would be addressed in the project area through proper design (e.g., gradual slopes, safety barriers as applicable); designation of

the area as off-limits to the public, with appropriate signage posted indicating that entry is prohibited; and regular inspections and maintenance of the stormwater facilities to ensure its continued safe operation and structural integrity. Fencing on the north side of the proposed stormwater channel may be considered pending final design.

There would be long-term, negligible adverse impacts related to hazardous materials and waste handling during operations. Routine maintenance activities may involve the use of small amounts of hazardous materials such as fuels for maintenance equipment, herbicides for vegetation control, and cleaning agents. These materials would be used in accordance with manufacturer instructions and applicable regulations, which would limit the potential for impacts.

3.9.2.4 Impact Reduction Measures

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

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

- Safety measures would be implemented around the stormwater basin, such as proper signage, safety barriers, and gradual slopes to minimize drowning risks. Fencing on the north side of the proposed stormwater channel may be considered pending final design.
- Regular inspections and maintenance of the stormwater management facilities would be conducted to ensure its continued safe operation and structural integrity.
- During removal and replacement of electrical lines, appropriate safety protocols, including de-energizing lines as applicable, ensuring proper grounding, and using protective barriers, would be implemented to prevent electrical hazards.
- Trenching safety measures such as shoring, trench boxes, and worker safety training would be implemented as applicable to minimize risks associated with excavation and confined space entry.
- As necessary, the need for further due diligence would be considered within potential disturbance area for utilities as shown in Figure 2-1 prior to construction. This could include ground penetrating radar within the potential disturbance area for wet utilities west of Chino Road prior to construction to investigate for presence of subsurface objects associated with the former PD Smelter Site.
- Construction workers, including utility providers, working in any potential disturbance areas for utilities would wear appropriate personal protective equipment during construction as necessary to avoid impacts from potentially contaminated soils, and would characterize any soils that are to be disposed of offsite to determine appropriate management and disposal requirements in accordance with federal, state, and local regulations.

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CHAPTER 4 AND COMMITMENTS OF RESOURCES

4.1 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 U.S.C. § 4332] requires 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 described in Section 1.2 and is 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 addition, the purpose of the Proposed Action is to address overall flood control and utility requirements, as well as improve port operational efficiency for the RHC LPOE Expansion and Modernization Project.

The project area impacted under the Proposed Action is primarily vacant, undeveloped land, or land within existing rights-of-way; characterized by areas of desert scrub and semi-desert grasslands. The proposed realigned Rose Avenue channel would terminate at an unnamed wash (see Figure 2-1). The Proposed Action would develop up to approximately 33.2 acres of land for flood control and utility upgrades. The amount of impervious surfaces created from the Proposed Action would depend upon whether the proposed channel segment is made of concrete or rock riprap (see Section 3.6.2.3). Development of the project area would require removal of existing vegetation, which would result in the alteration of the existing ecological community. Development of the project area would also further contribute to habitat fragmentation; however, the vegetation does not represent high-quality native habitat for local species (see Section 3.7.2.3).

The project area does 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 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 help address and improve stormwater management and flood controls and provide sufficient stormwater capacity for the expanded and modernized RHC LPOE; and would enhance the overall functionality and safety at the LPOE.

4.2 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

Section 102(C)(v) of NEPA [42 U.S.C. § 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" means 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 right-of-way, 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.

4.2.1 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, graders, scrapers, excavators, loaders, trucks) used to excavate and develop the land for the Proposed Action;
- Materials used to construct the proposed realigned Rose Avenue channel segment, new stormwater basin, and various utility lines, which could include cement/concrete, steel, iron, rock riprap, wooden poles, and fill material;
- Land required for development of the Proposed Action; and
- Water used for construction purposes.

4.2.2 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 minor amounts of vegetation at the project area (up to 33.2 acres).

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M.A. Historic Preservation, 1998
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CHAPTER 7 LIST OF AGENCIES, ORGANIZATIONS, AND PERSONS CONTACTED

U.S. Federal Government
Bureau of Land Management, Tucson Field Office
U.S. Environmental Protection Agency, Region 9, San Francisco, California
U.S. Fish and Wildlife Service, Region 2, Albuquerque, New Mexico
U.S. Fish and Wildlife Service, Arizona Ecological Services Office
U.S. Geological Survey
U.S. Customs and Border Protection
U.S. Department of State
Federal Emergency Management Agency, Region 9
U.S. Army Corps of Engineers, Arizona-Nevada Office

Arizona State Government
Arizona State Historic Preservation Office
Arizona Department of Transportation
Arizona Game and Fish Department
Arizona Department of Environmental Quality

Tribal Consultation
Fort Sill Apache Tribe
Hopi Tribe
Mescalero Apache Tribe
Pascua Yaqui Tribe
Pueblo of Zuni
San Carlos Apache Tribe
Tohono O'Odham Nation
White Mountain Apache Tribe

Local Government
Cochise County
City of Douglas

Miscellaneous Organizations
Southeastern Arizona Governments Organization
Ramirez Advisors
Osvil International

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Karen Armenta
Carmen Bernal
Harold Blank
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Janea Sanchez
Michael Saremi
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Nearby residences and parcels within the project area boundaries were also provided notices.

APPENDIX A – PUBLIC SCOPING REPORT

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ACRONYMS AND ABBREVIATIONS

CBC	concrete box culvert
CBP	U.S. Customs and Border Protection
COV	commercially-owned vehicle
EIS	Environmental Impact Statement
GSA	U.S. General Services Administration
I-10	Interstate 10
LPOE	Land Port of Entry
NEPA	National Environmental Policy Act
NOI	Notice of Intent
POV	privately-owned vehicle
RHC	Raul Hector Castro
ROD	Record of Decision
SEIS	Supplemental Environmental Impact Statement
SR-80	State Route 80
U.S.	United States
US-191	U.S. Highway 191
U.S.C.	United States Code

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A.1 INTRODUCTION

This Public Scoping Report summarizes the United States (U.S.) General Services Administration's (GSA) public scoping activities and public comments on the Supplemental Environmental Impact Statement (SEIS) for the Expansion and Modernization of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) and Proposed Commercial LPOE in Douglas, Arizona. GSA completed a *Final Environmental Impact Statement for the Expansion and Modernization of the Raul Hector Castro Land Port of Entry and Proposed Commercial Land Port of Entry in Douglas, Arizona* in April 2024 (herein referred to as the 2024 Final Environmental Impact Statement [EIS]) and signed a Record of Decision (ROD) for the 2024 Final EIS on May 14, 2024. In the ROD, GSA selected the preferred alternative, identified as Alternative 2 (Concurrent Construction – Westward Expansion), herein referred to as the 2024 Final EIS preferred alternative, which would involve construction of a new Commercial LPOE and phased expansion and modernization of the existing RHC LPOE at the same time, with expansion primarily to the west of the existing RHC LPOE. During design of the RHC LPOE Expansion and Modernization Project, GSA identified changes needed to the 2024 Final EIS preferred alternative to address flood control issues and utility requirements. As a result of these proposed changes, GSA has determined that supplemental analysis under the National Environmental Policy Act (NEPA) is required.

GSA has prepared a SEIS for the purpose of analyzing the potential environmental impacts resulting from the project, in accordance with the NEPA of 1969 (42 United States Code [U.S.C.] 4321 *et seq*.) as amended by the Fiscal Responsibility Act of 2023 (Public Law 118-5), 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 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 Chapter 5. GSA took these issues into consideration when defining the scope and areas of emphasis (or focus) of the SEIS. This document also includes the following appendices:

- Attachment A: *Federal Register* Notice
- Attachment B: Newspaper Affidavits
- Attachment C: Letter to Interested Parties
- Attachment D: Advertising on Social Media
- Attachment E: Scoping Meeting Poster Displays
- Attachment F: Scoping Comment Form
- Attachment G: Scoping Meeting Handouts
- Attachment H: Scoping Meeting Sign-In Sheets
- Attachment I: Original Comment Letters
- Attachment J: Index of Comments by Source and Date

A.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, GSA previously considered a Proposed Actions to expand and modernize the existing RHC LPOE and construct a new Commercial LPOE to the west of the existing facilities, as analyzed in the 2024 Final EIS.

During design of the RHC LPOE Expansion and Modernization Project, GSA determined that the existing alignment of the Rose Avenue channel, a regulatory floodway that runs directly west of the existing RHC LPOE and through the 2024 Final EIS preferred alternative project area, could result in increased flood risk to the expanded and modernized RHC LPOE and as well as additional engineering and construction costs. In addition, GSA determined additional utility work is required that was not evaluated in the 2024 Final EIS. As such, GSA is proposing a project that includes realigning a segment of the Rose Avenue channel, constructing a new stormwater basin, and replacing or installing various utility lines. The project may also include acquiring additional land or obtaining appropriate land use agreements, as well as obtaining necessary permissions to implement these changes.

A.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. The city 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.

The RHC LPOE is located at the intersection of 1st Street and Pan American Avenue. 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 the City of Douglas. Adjacent land within the 2024 Final EIS preferred alternative project area includes a small city park, a cluster of small shops, and undeveloped land. Commercial and industrial warehouses exist along the eastern perimeter of the RHC LPOE, along Customs Avenue and 1st Street.

The RHC LPOE is located on approximately 6 acres with facilities owned and managed by GSA and operated by CBP. The project area is located west of the existing RHC LPOE and Pan American Avenue, south of East 3rd Street, north of Border Road and the U.S. – Mexico border, and just west of Chino Road. See Figure A-1 for a regional figure of the RHC LPOE and proposed project area.

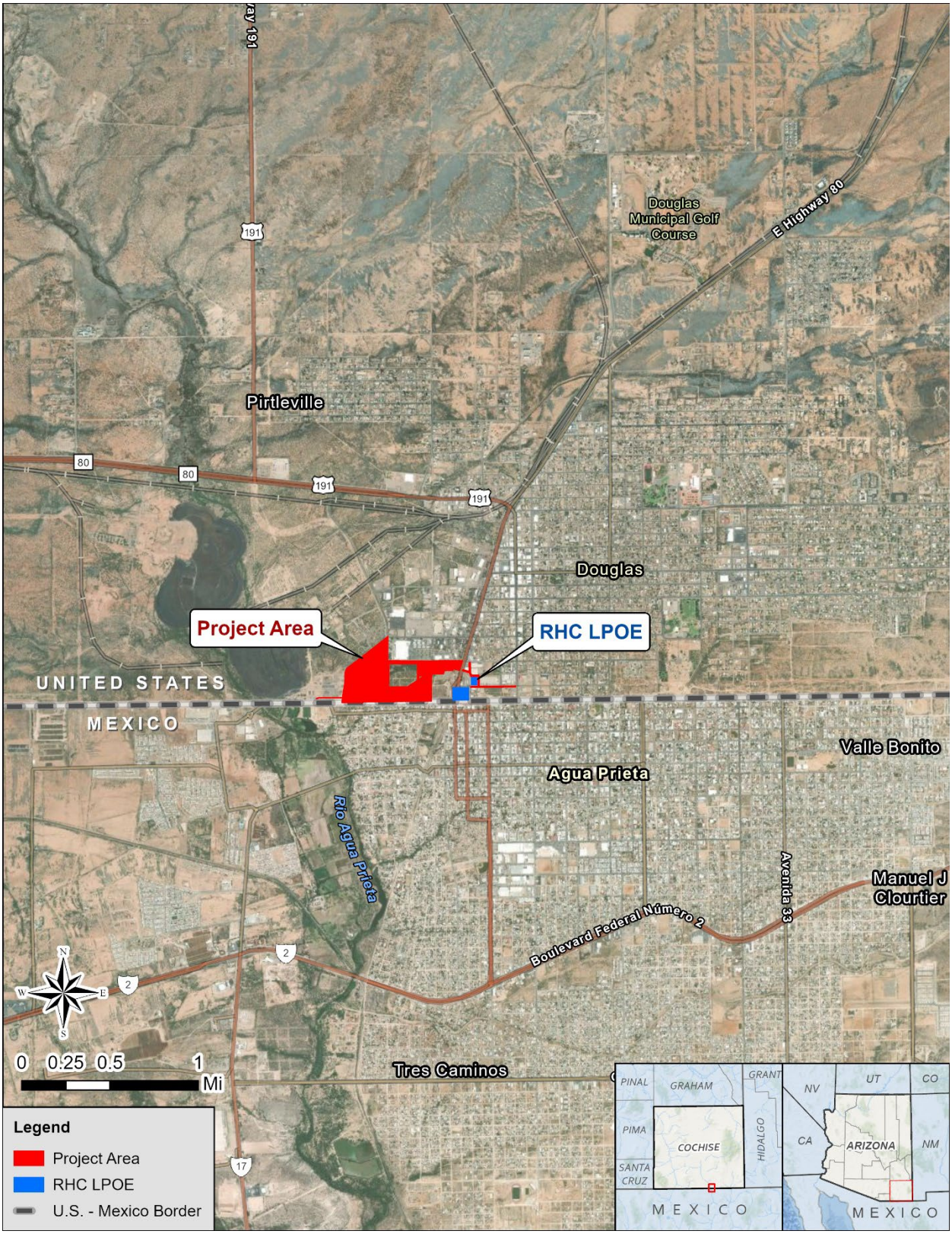

Figure A-1. Location Map of the RHC LPOE and the Project Area

A.2.2 Purpose and Need

The purpose of this project considered within this supplemental analysis is to address overall flood control and utility requirements (i.e., stormwater, electrical, sanitary sewer, and fiber optic), as well as improve port operational efficiency for the RHC LPOE Expansion and Modernization Project. The project is needed to avoid engineering conflicts between the current alignment of the Rose Avenue channel with the current proposed layout for the expanded and modernized RHC LPOE; to divert stormwater away from and reduce flooding risks at the RHC LPOE; to provide sufficient stormwater retention capacity for the expanded and modernized RHC LPOE; and to enhance overall functionality and safety. In addition, the project is needed to meet proposed utility requirements of the expanded and modernized RHC LPOE and bring them in line with current land port design standards and operational requirements. Existing electrical lines are also located within the area proposed for realignment of a segment of the Rose Avenue channel and that power the city's Wastewater Treatment Plant (WWTP), located west of the existing RHC LPOE. These lines need to be relocated to maintain electrical service to the WWTP as well as to satisfy CBP design requirements, which prohibit overhead lines within LPOE boundaries.

A.2.3 Proposed Action and Alternatives

As part of the decision-making process, GSA is carrying forward one action alternative (Alternative 1 – Flood Control and Utility Upgrades) and the No Action Alternative for analysis in this SEIS.

Under Alternative 1, GSA proposes to construct flood control and utility upgrades in the vicinity of the RHC LPOE that were not included in the 2024 Final EIS (see Figure A-2). The proposed layout provided in Figure A-2 represents a preliminary concept site plan for development and is used as a basis for discussion and environmental analysis. This alternative would support and interconnect with design elements from 2024 Final EIS preferred alternative. The key components of Alternative 1 include:

- Construction of an approximately 2,750-foot-long stormwater channel that is anticipated to be primarily a riprap-lined open channel along the entire route. A small, approximately 50-foot segment of the stormwater channel where it meets Border Road would be concrete-lined to facilitate vehicle access. GSA is also considering construction of the entire proposed channel segment as an open, concrete-lined channel, although the riprap-lined open channel is the current preference. The proposed channel would originate at an extended culvert box crossing (CBC) near the existing RHC LPOE and terminate at an unnamed wash west of Chino Road.
- Evaluation and improvement of the existing CBC beneath the LPOE, with potential partial maintenance of the existing structure.
- Extension of the existing CBC to the west, terminating near the planned repatriation drop-off location.
- Demolition of the existing stormwater channel along Pan American Avenue, with appropriate grading and erosion control measures.
- Installation of a new manhole and connection to an existing sanitary sewer line east of Chino Road.
- Construction of a maintenance road on the north or south side of the proposed stormwater channel.
- Potential construction of security fencing on the north side of the proposed stormwater channel.
- Improvement of the Chino Road hydraulic structure, including installation of a new CBC and associated road repairs.
- Construction of a 6.2-acre stormwater retention basin between the RHC LPOE and Chino Road.
- Construction of various electrical, sanitary sewer, and fiber optic lines on the east and west sides of the 2024 Final EIS preferred alternative project area.

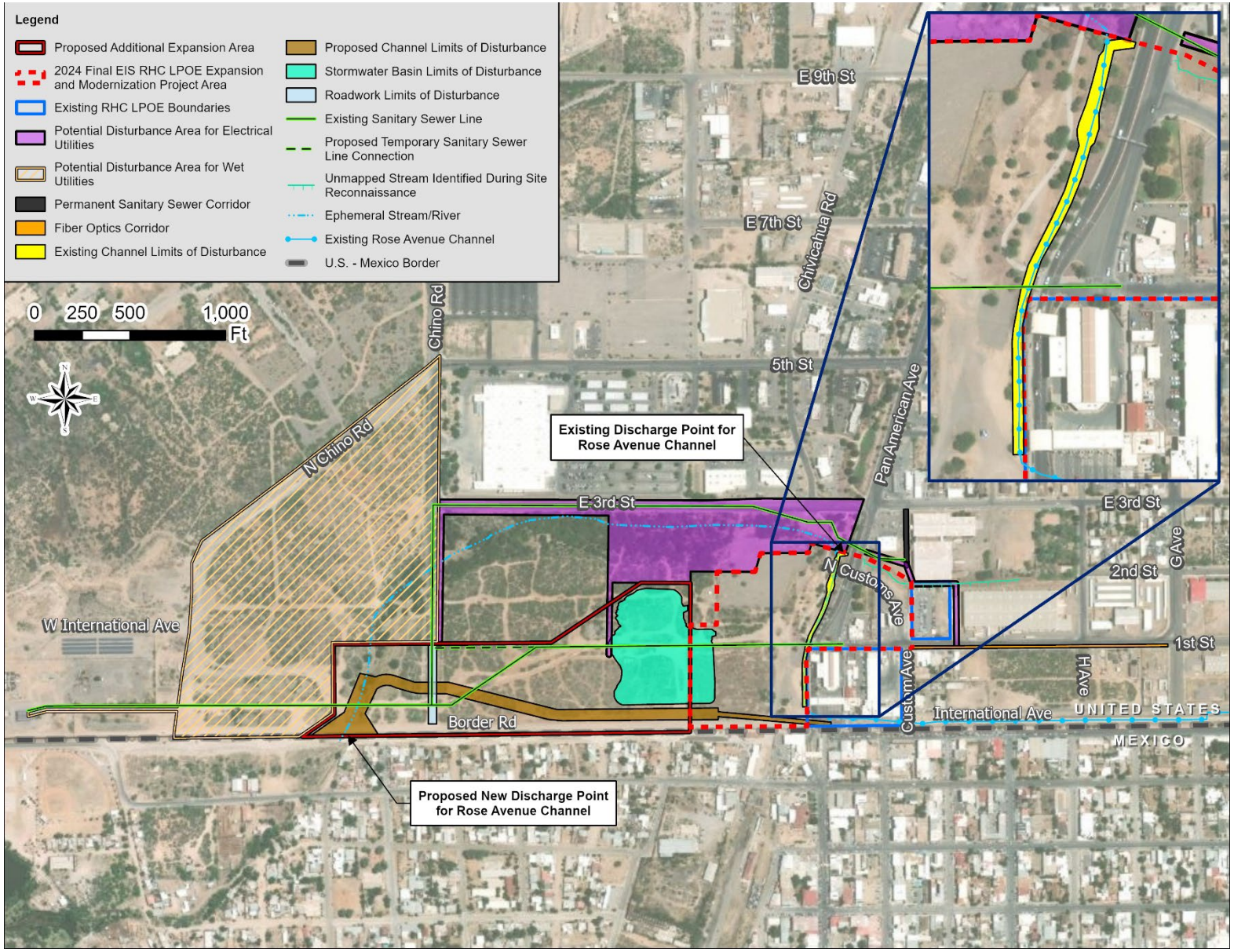

Figure A-2. Proposed Action Limits of Disturbance

- Acquisition of necessary land and right-of-way permissions, potentially totaling approximately 24 acres. Additional land area would be disturbed for utility work; however, all construction work for proposed utility lines would be conducted within existing or newly established rights-of-way.

Refer to Chapter 2 of the SEIS for a full description of Alternative 1 and the No Action Alternative.

The No Action Alternative serves as a baseline scenario for which potential environmental consequences can be compared to in the SEIS. Under the No Action Alternative, GSA would not move forward with the flood control and utility upgrades. Overall stormwater management and flood control needs for the expanded and modernized RHC LPOE would not be addressed; stormwater flow would not be diverted; electric, sanitary sewer, and fiber optic requirements would not be met; and engineering conflicts between the current alignment of the Rose Avenue channel and the RHC LPOE Expansion and Modernization Project layout would remain.

A.3 NOTIFICATION OF PROJECT SCOPING

Notification of project scoping for this SEIS was accomplished using multiple channels of communication, including a Notice of Intent (NOI) in the *Federal Register*, newspaper ads, letters to interested parties, and social media posts.

A.3.1 Notice of Intent

An NOI for the SEIS was published in the *Federal Register* on October 8, 2024, indicating the public scoping period would begin on October 11, 2024. The NOI was published under Docket ID No. 2024-0002 Sequence No. 45, UNIQUE IDENTIFIER: SEIS-023-00-009-1727281974 (FR vol. 89, no. 195). The NOI announced GSA's intent to prepare a SEIS and conduct a public scoping meeting; provided a brief description of the project; and included instructions on submitting a comment. The NOI also indicated the date, time, and location of the public scoping meeting and announced that public comments were requested to be received within the 30-day scoping period, no later than November 11, 2024. The *Federal Register* notice is included in Attachment A.

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 October 24, 2024 public scoping meeting. The advertisements indicated GSA's intent to prepare a SEIS and conduct a public 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 30-day scoping period, no later than November 11, 2024. The advertisements were published in the *Herald Review* on October 11, 16, and 20, 2024. Affidavits of the legal notices are included in Attachment B.

A.3.3 Interested Parties Letter

A scoping letter dated October 11, 2024 was mailed to federal agencies, state and local agencies, tribal entities, elected officials, and other interested parties. The letter provided background information on the project, a description of the alternatives, public scoping meeting details, and instructions on submitting comments. A copy of the letter sent to interested parties is included in Attachment C.

A.3.4 Social Media

In advance of the October 24, 2024 public scoping meeting, GSA posted announcements of the meeting on two social media accounts on October 15, 2024 and on the RHC LPOE website:

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

The social media posts briefly summarized the purpose of the public scoping meeting and detailed the time, date, and location of the meeting. The City of Douglas also posted announcements of the public scoping meeting on the city's social media accounts on October 15, 16 and 22, 2024 in English and Spanish. Screenshots of the social media postings can be found in Attachment D.

A.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.

A.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 SEIS.

A.4.2 Meeting Details and Location

The public scoping meeting was held on Thursday, October 24, 2024 from 4 p.m. to 6 p.m. at the Douglas Visitor Center located at 345 16th Street, Douglas, Arizona, 85607. Approximately 29 people attended the public scoping meeting.

A.4.3 Open House Format

An open house format for the public scoping 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, NEPA timeline, 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 public scoping meeting are included in Attachment E, F, G, and H, respectively.

A.5 PUBLIC SCOPING COMMENTS

GSA invited comments for scoping of this SEIS during the scoping period (October 11 – November 11, 2024), including on the key topics that should be covered in the SEIS; examples of potential adverse and beneficial impacts from the proposed project; and any other additional, relevant information available.

A.5.1 Collecting Comments

Comments were submitted to GSA using comment forms, letters, and emails. Original copies of comments provided are included in Attachment I.

A.5.2 Summary of Commenters

Comments were indexed based on the source, or commenter. Commenters included federal and state 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 6 unique commenters provided input during the scoping period. Attachment J includes an index of commenters by type (i.e., agency, public) and dates comments were received.

A.5.3 Issues Identified During Scoping

Each concern or question associated with a commenter was categorized by resource area. Table A-1 provides a summary of the comments and location in the SEIS, if addressed and rationale, if not addressed. In addition to the comments captured in Table A-1, one commenter submitted a comment inquiring whether their land parcel would be acquired as part of the project and another commenter submitted a proposed layout for the project.

A.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 SEIS Project Manager
- Paul DiPaolo (PHE) – SEIS Project Manager/Reviewer
- Sean McCain (PHE) – Environmental Consultant/Author
- Mimi Drozdetski (PHE) – Environmental Analyst/Author
- Pam Lawson (PHE) – Editor

Table A-1. Commenters and Comments by Category

Comments[a]	Addressed in SEIS?	If yes, location in SEIS or 2024 Final EIS. If no, rationale.
Consultation and Coordination (2 commenters; 3 comments) [Note: Comment letter received outside of scoping period.]		
• One commenter (A) recommended for GSA to consult with Arizona Department of Environmental Quality regarding all stormwater channeling and discharge design, and any state permit requirements.	• Yes	• GSA has coordinated with the Arizona Department of Environmental Quality regarding stormwater permitting requirements. Section 3.6 of the SEIS reflects the results of the discussion with the Arizona Department of Environmental Quality regarding stormwater related permits anticipated to be required during construction.
• One commenter (A) encouraged GSA to coordinate project planning with potentially interested tribes that may have cultural affiliations in the area of project implementation, as tribal consultation is vital to the preservation of tribal culture.	• Yes	• See Sections 1.3.3 and 3.2.1.3 of the SEIS.
• The commenter recommended that GSA seek additional information and coordinate the project with the Arizona Game and Fish Department. 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 (https://www.azgfd.com/wildlife/planning/projevalprogram/)	• Yes	• See Section 3.7.1.3 of the SEIS.
Biological Resources (2 commenters; 9 comments)		
• 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 SEIS.	• Yes	• See Sections 3.7.1.3 and 3.7.2.3 of the SEIS.
• The commenter referred the GSA to their submitted comments for the Draft EIS, which considers species protected under the Migratory Bird Treaty Act (MBTA) (16 U.S.C. 703- 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	• Yes	• See Sections 3.7.1.3, 3.7.2.3, and 3,7.2.4 of the SEIS.

Comments[a]	Addressed in SEIS?	If yes, location in SEIS or 2024 Final EIS. If no, rationale.
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. 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 (https://www.azgfd.com/wildlife/planning/projevalprogram/).		
• The commenter noted that implementation of the project is likely to alter components of habitat through vegetation removal, dust creation, and altered hydrology as ground and soil would be disturbed. The commenter indicated that these components may alter foraging, nesting, roosting, or prey availability for federally listed species.	• Yes	• See Section 3.7.2.3 of the SEIS.
• The commenter expressed that project implementation is likely to increase the ambient noise levels from construction activities and equipment. The commenter noted that several species that could occur within the action area are sensitive to anthropogenic disturbance and could experience adverse effects.	• Yes	• See Section 3.7.2.3 of the SEIS.
• The commenter noted concerns related to sedimentation and water diversion, pointing to water as a critical component in shaping habitats in arid environments. The commenter explained that quantify and timing of water often determines the floral and faunal communities of an area, and that altering flow and increasing sedimentation could adversely affect local ecosystem processes upon which listed species rely.	• Yes	• See Section 3.7.2.3 of the SEIS.
• One commenter (A) submitted a report for the proposed supplemental action site using the Arizona Online Environmental Review Tool (ERT). The report indicates that western burrowing owl, a special status species that is regulated under the MBTA, could occur within the project footprint. The commenter recommends conducting an occupancy survey to determine if this species occurs within this project footprint if suitable habitat for this species is present within or adjacent to the project area. The commenter indicated that if an active burrowing owl burrow is detected, the Arizona Game & Fish Department and USFWS should be contacted for direction.	• Yes	• See Sections 3.7.1.3, 3.7.2.3, and 3.7.2.4 of the SEIS.
• The commenter noted that vegetation within the project area may provide nesting opportunities for avian species regulated under the MBTA and protected under state law. The commenter indicated that breeding season for birds, including raptors, in the project vicinity is generally January through the end of June. The commenter recommends a qualified biologist conduct surveys for nesting birds within the project area prior to removal or trimming of vegetation, if necessary during the breeding season. If nesting birds are	• Yes	• See Sections 3.7.2.3 and 3.7.2.4 of the SEIS.

Comments[a]	Addressed in SEIS?	If yes, location in SEIS or 2024 Final EIS. If no, rationale.
present, the commenter recommends to delay implementing the project until after the nesting season, and contacting USFWS for technical assistance if this option is not possible		
• The commenter recommended that trenching/digging and backfilling crews work together to minimize the amount of open trenches at any given time. Where trenches/holes cannot be backfilled immediately, the commenter recommended escape ramps be constructed in each hole and at least every 90 meters in trenches. Escape ramps can be short lateral trenches or wooden planks sloping to the surface. The commenter recommended that slopes be less than 45 degrees (1:1) and trenches and holes that have been left open be inspected to remove animals prior to backfilling.	• Yes	• See Sections 3.7.2.3 and 3.7.2.4 of the SEIS.
• The commenter brought up concerns regarding invasive plant species and their detrimental effect on local ecosystems and fire regimes. The commenter noted that as construction efforts will cause ground disturbance in which many invasive plant species could thrive, it is encouraged to minimize the potential introduction or spread of exotic invasive species by taking precautions such as washing and/or decontaminating all equipment utilized in the project activities before entering and leaving the site. The commenter also recommended GSA to employ invasive vegetation monitoring and treatment post construction. This would include reviewing the Arizona Department of Agriculture's website for a list of prohibited and restricted noxious weeds and the Arizona Native Plant Society for recommendations on control methods. The commenter referred to iMapInvasives – a national cloud-based application for tracking and managing invasive species.	• Yes	• See Section 3.7.2.3 and 3.7.2.4 of the SEIS.
Human Health and Safety (1 commenter; 1 comment)		
• One commenter (P) expressed concerns over the open stormwater channel creating a safety hazard during flooding events to anyone in the stormwater channel and referenced an incident in prior years where individuals drowned in the stormwater channel.	• Yes	• See Section 3.9.2.3 of the SEIS.

[a] Commenters included federal or state agencies (A) and members of the public (P)
ADEQ = Arizona Department of Environmental Quality; CBP = U.S. Customs and Border Protection; CFR = Code of Federal Regulations; SEIS = Supplemental Environmental Impact Statement; FR = *Federal Register*; GSA = U.S. General Services Administration; LPOE = land port of entry; NEPA = National Environmental Policy Act; RHC LPOE = Raul Hector Castro Land Port of Entry

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ATTACHMENT A: FEDERAL REGISTER NOTICE

Federal Register / Vol. 89, No. 195 / Tuesday, October 8, 2024 / Notices 81529

POLICIES AND PRACTICES FOR RETRIEVAL OF RECORDS:

Records in this system of records can be retrieved by any category field, *e.g.,* individual name, entity name, rulemaking number, and/or docket number.

POLICIES AND PRACTICES FOR RETENTION AND DISPOSAL OF RECORDS:

The information in this system is maintained and disposed of in accordance with the National Archives and Records Administration (NARA) General Records Schedule 6.6: Rulemaking Records (DAA–GRS–2017–0012).

ADMINISTRATIVE, TECHNICAL, AND PHYSICAL SAFEGUARDS:

The electronic records, files, and data are stored in a database housed in the FCC computer network. While comments and other files and records are generally publicly available, access to certain information associated with filings is restricted to authorized employees and contractors; and to IT staff, contractors, and vendors who maintain the IT networks and services. Other employees and contractors may be granted access on a need-to-know basis. The electronic files and records are protected by the FCC privacy safeguards, a comprehensive and dynamic set of IT safety and security protocols and features that are designed to meet all Federal privacy standards, including those required by the Federal Information Security Modernization Act of 2014 (FISMA), the Office of Management and Budget (OMB), and the National Institute of Standards and Technology (NIST).

RECORD ACCESS PROCEDURES:

Individuals wishing to request access to and/or amendment of records about themselves should follow the Notification Procedure below.

CONTESTING RECORD PROCEDURES:

Individuals wishing to request access to and/or amendment of records about themselves should follow the Notification Procedure below.

NOTIFICATION PROCEDURES:

Individuals wishing to determine whether this system of records contains information about themselves may do so by writing to *privacy@fcc.gov*. Individuals requesting access must also comply with the FCC's Privacy Act regulations regarding verification of identity to gain access to records as required under 47 CFR part 0, subpart E.

EXEMPTIONS PROMULGATED FOR THE SYSTEM:

None.

HISTORY:

88 FR 87774 (December 19, 2023).

Federal Communications Commission.

Marlene Dortch,

Secretary.

[FR Doc. 2024–23214 Filed 10–7–24; 8:45 am]

BILLING CODE 6712–01–P

GENERAL SERVICES ADMINISTRATION

[Notice–PBS–2024–13; Docket No. 2024–0002; Sequence No. 45; UNIQUE IDENTIFIER: SEIS–023–00–009–1727281974]

Notice of Intent To Prepare a Supplemental 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

AGENCY: Public Buildings Service (PBS), General Services Administration (GSA).

ACTION: Notice of intent (NOI); announcement of public scoping 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 a Supplemental Environmental Impact Statement (SEIS) will be prepared to evaluate potential environmental impacts from a proposed flood channel realignment and expansion of retention basin to the west of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) in Douglas, Arizona. This NOI also announces the public scoping process for the SEIS.

DATES:

Public Scoping Period—The public scoping period begins on Friday, October 11, 2024. Interested parties are encouraged to provide comments regarding the scope of the SEIS. Written comments must be received by November 11, 2024 (see **ADDRESSES** section of this NOI on how to submit comments).

Meeting Date—A public scoping meeting will be held on Thursday, October 24, 2024, from 4:00 p.m. to 6:00 p.m. 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 scope of the project. The meeting will be an informal open house, where visitors may come, receive information, and provide written comments. No formal presentation will be provided.

ADDRESSES:

Public Scoping Comments—You may send comments, identified by [2024–0002], by one of the following methods:

- *Email: Osmahn.Kadri@gsa.gov.* Include [2024–0002] 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.*

SUPPLEMENTARY INFORMATION:

Background

GSA is beginning preparation of a SEIS to analyze the potential impacts resulting from the proposed realignment and reconstruction of the Rose Avenue Channel and construction of a new stormwater retention basin west of the expanded and modernized RHC LPOE. This SEIS will supplement the previous Environmental Impact Statement (EIS) for the RHC LPOE expansion and modernization project. GSA signed the Record of Decision (ROD) for the Final EIS for the Expansion and Modernization of the RHC LPOE and Proposed Commercial LPOE in Douglas, Arizona on May 6, 2024. GSA approved the preferred alternative, identified in the Final EIS as Alternative 2 (Concurrent Construction—Westward Expansion), which would involve construction of a new Commercial LPOE and phased expansion and modernization of the existing RHC LPOE at the same time, with expansion primarily to the west of the existing RHC LPOE.

Under the Proposed Action for the SEIS, the existing concrete box culvert beneath the LPOE would be partially maintained and extended westward near the existing vehicle inspection booths. From there, an open channel would be constructed generally parallel and to the north of Border Road and would discharge into an existing wash just west of Chino Road. The existing north-south channel that runs parallel to Pan American Avenue would be abandoned and sealed or demolished in conjunction with the expansion and modernization of the RHC LPOE. An expanded stormwater retention basin would also be constructed just west of

the existing Alternative 2 Expansion Area as identified in the Final EIS. In addition to the Proposed Action, GSA will also consider the No Action Alternative.

The purpose of the Proposed Action is to address stormwater management and flood control needs for the expanded and modernized RHC LPOE. The need for the Proposed Action is that the current alignment of the Rose Avenue Channel will result in engineering conflicts with the current proposed layout for the expanded RHC LPOE and requires re-routing. Additional land area is also required for necessary stormwater retention at the expanded and modernized RHC LPOE.

Preliminary analysis indicates that short-term adverse environmental impacts may occur during construction on air quality and greenhouse gases from emissions; geology and soils and water resources from ground disturbance; and biological resources from ground disturbance and construction noise. GSA will be conducting a jurisdictional determination, archaeological survey, and Phase I Environmental Site Assessment to inform potential impacts to Waters of the United States, cultural resources, and human health and safety, respectively. Minimal or no impacts are expected to occur to the following resources: transportation and traffic; noise; socioeconomics, and environmental justice. Beneficial impacts are expected to infrastructure and utilities from the improvement of stormwater management facilities. The Proposed Action may require acquisition of additional land to the west of the RHC LPOE. Necessary permits and authorizations will be identified within the Draft EIS.

The Draft EIS is expected to be published in early 2025.

Russell Larson,

Director, Portfolio Management Division, Pacific Rim Region, Public Buildings Service.

[FR Doc. 2024–23200 Filed 10–7–24; 8:45 am]

BILLING CODE 6820–YF–P

OFFICE OF GOVERNMENT ETHICS

Updated OGE Senior Executive Service Performance Review Board

AGENCY: Office of Government Ethics (OGE).

ACTION: Notice.

SUMMARY: Notice is hereby given of the appointment of a member to the OGE Senior Executive Service (SES) Performance Review Board.

DATES: *Applicable date:* October 8, 2024.

FOR FURTHER INFORMATION CONTACT: Shelley K. Finlayson, Acting Director, Chief of Staff, and Program Counsel, Office of Government Ethics, 250 E Street SW, Suite 750, Washington, DC 20024; Telephone: 202–482–9300; TYY: 800–877–8339; FAX: 202–482–9237.

SUPPLEMENTARY INFORMATION: Federal law at 5 U.S.C. 4314(c) requires each agency to establish, in accordance with regulations prescribed by the Office of Personnel Management at 5 CFR part 430, subpart C and § 430.310 thereof in particular, one or more Senior Executive Service performance review boards. As a small executive branch agency, OGE has just one board. In order to ensure an adequate level of staffing and to avoid a constant series of recusals, the designated members of OGE's SES Performance Review Board are being drawn, as in the past, in large measure from the ranks of other executive branch agencies. The board shall review and evaluate the initial appraisal of each OGE senior executive's performance by their supervisor, along with any recommendations in each instance to the appointing authority relative to the performance of the senior executive. This notice updates the membership of OGE's SES Performance Review Board as it was most recently published at 88 FR 75591 (Nov. 3, 2023).

The following official has been appointed to the SES Performance Review Board of the Office of Government Ethics: Danae M. Serrano, Ethics Counsel, Securities and Exchange Commission. The remaining Board members are Sean Dent, Senior Deputy General Counsel, Federal Housing Finance Agency, and Peter J. Constantine, ADAEO, Office of the General Counsel, Department of Transportation.

Approved: October 2, 2024.

Shelley K. Finlayson,

Acting Director, U.S. Office of Government Ethics.

[FR Doc. 2024–23212 Filed 10–7–24; 8:45 am]

BILLING CODE 6345–02–P

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Centers for Medicare & Medicaid Services

[Document Identifier: CMS–10116]

Agency Information Collection Activities: Submission for OMB Review; Comment Request

AGENCY: Centers for Medicare & Medicaid Services, Health and Human Services (HHS).

ACTION: Notice.

SUMMARY: The Centers for Medicare & Medicaid Services (CMS) is announcing an opportunity for the public to comment on CMS' intention to collect information from the public. Under the Paperwork Reduction Act of 1995 (PRA), federal agencies are required to publish notice in the **Federal Register** concerning each proposed collection of information, including each proposed extension or reinstatement of an existing collection of information, and to allow a second opportunity for public comment on the notice. Interested persons are invited to send comments regarding the burden estimate or any other aspect of this collection of information, including the necessity and utility of the proposed information collection for the proper performance of the agency's functions, the accuracy of the estimated burden, ways to enhance the quality, utility, and clarity of the information to be collected, and the use of automated collection techniques or other forms of information technology to minimize the information collection burden.

DATES: Comments on the collection(s) of information must be received by the OMB desk officer by November 7, 2024.

ADDRESSES: Written comments and recommendations for the proposed information collection should be sent within 30 days of publication of this notice to *www.reginfo.gov/public/do/PRAMain.* Find this particular information collection by selecting ''Currently under 30-day Review—Open for Public Comments'' or by using the search function.

To obtain copies of a supporting statement and any related forms for the proposed collection(s) summarized in this notice, please access the CMS PRA website by copying and pasting the following web address into your web browser: *https://www.cms.gov/Regulations-and-Guidance/Legislation/PaperworkReductionActof1995/PRA-Listing.*

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ATTACHMENT B: NEWSPAPER AFFIDAVITS

Herald Review newspaper advertisements (English) – October 11, October 16, and October 20, 2024

HERALD/REVIEW
Serving all of Cochise County MEDIA

AFFIDAVIT OF PUBLICATION

State of New Jersey, County of Burlington, ss:

Will Lamb, being first duly sworn, deposes and says: That (s)he is a duly authorized signatory of Column Software, PBC, duly authorized agent of Herald/Review Media, a newspaper printed and published in the City of Sierra Vista, County of Cochise, State of Arizona, and 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:
Oct. 11, 2024, Oct. 16, 2024, Oct. 20, 2024

NOTICE ID: gLZGGl21zdGLEwWr6O0J
NOTICE NAME: Douglas SEIS Public Notice

REQUEST OF

Mimi Drozdetski

I declare under penalty of perjury that the foregoing is true and correct.

Will Lamb
(Signed)

VERIFICATION

State of New Jersey
County of Burlington

LIZA ORTIZ
NOTARY PUBLIC
STATE OF NEW JERSEY
My Commission Expires November 27, 2028

Subscribed in my presence and sworn to before me on this: 10/23/2024

Notary Public
Notarized remotely online using communication technology via Proof.

PUBLIC NOTICE

Public Scoping Meeting for the Supplemental Environmental Impact Statement for the Expansion and Modernization of the Raul Hector Castro Land Port of Entry and Proposed Commercial Land Port of Entry

The United States (U.S.) General Services Administration (GSA) gives early notification to the public of the agency's intent to prepare a Supplemental Environmental Impact Statement (SEIS) to analyze the potential impacts resulting from the proposed realignment and reconstruction of the Rose Avenue Channel and construction of a new stormwater retention basin to the west of the expanded and modernized Raul Hector Castro (RHC) Land Port of Entry (LPOE).

This SEIS will supplement the previous Environmental Impact Statement (EIS) for the RHC LPOE expansion and modernization project. GSA signed the Record of Decision (ROD) for the Final EIS for the Expansion and Modernization of the RHC LPOE and Proposed Commercial LPOE in Douglas, Arizona on May 6th, 2024. GSA approved the preferred alternative, identified in the Final EIS as Alternative 2 (Concurrent Construction – Westward Expansion), which would involve construction of a new Commercial LPOE and phased expansion and modernization of the existing RHC LPOE at the same time, with expansion primarily to the west of the existing RHC LPOE.

Under the Proposed Action for the SEIS, the existing concrete box culvert beneath the LPOE would be partially maintained and extended westward near the existing vehicle inspection booths. From there, an open channel would be constructed generally parallel and to the north of Border Road and would discharge into an existing wash west of Chino Road. An expanded stormwater retention basin would also be constructed west of the expanded and modernized RHC LPOE. The flood channel realignment would address and improve overall stormwater management and flood control concerns, as well as improve port operation efficiency at the expanded and renovated RHC LPOE. Construction would consider local and county floodplain ordinance requirements as well as adhere to GSA P100 standards. In addition to the Proposed Action, the SEIS will consider the No Action Alternative, where GSA does not proceed with the Proposed Action.

A portion of the Proposed Action, where demolition of the existing stormwater channel is planned, is located within a designated 1-percent-annual-chance floodplain or 0.2-percent-annual-chance floodplain (100-year and 500-year floodplain, respectively), which is located directly to the west of the RHC LPOE. Under Executive Order (E.O.) 11988 (*Floodplain Management*) and E.O. 13690 (*Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder input*), GSA is required to review the project for possible alternative solutions to the Proposed Action.

Agencies that are being contacted for input into the analysis of the project are similar to those identified in the Final EIS for the RHC LPOE expansion and modernization project and include the Federal Emergency Management Agency (FEMA), the U.S. Army Corps of Engineers (USACE), and applicable state, county, and local offices.

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 SEIS. The scoping meeting will occur on **Thursday, October 24th** from 4:00 p.m. to 6:00 p.m., at:
Douglas Visitor Center, 345 16th Street, Douglas, Arizona, 85607

Comments must be received by **November 11th, 2024** and may be submitted at the scoping meeting, by email to 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

Further information on the project may be found online 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

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.

Para obtener más información o si necesita ayuda especial para asistir y participar en la reunión pública, comuníquese con Osmahn Kadri, gerente de proyectos de GSA NEPA, al 415-522-3617.

Publish: October 11, 16 and 20, 2024

Herald Review newspaper advertisements (Spanish) – October 11, October 16, and October 20, 2024

HERALD/REVIEW
Serving all of Cochise County MEDIA

AFFIDAVIT OF PUBLICATION

State of New Jersey, County of Burlington, ss:

Will Lamb, being first duly sworn, deposes and says: That (s)he is a duly authorized signatory of Column Software, PBC, duly authorized agent of Herald/Review Media, a newspaper printed and published in the City of Sierra Vista, County of Cochise, State of Arizona, and 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:
Oct. 11, 2024, Oct. 16, 2024, Oct. 20, 2024

NOTICE ID: Ew8EAfXXMyCN1uaHch3V
NOTICE NAME: Douglas SEIS Public Notice - SP

REQUEST OF

Mimi Drozdetski

I declare under penalty of perjury that the foregoing is true and correct.

Will Lamb
(Signed)_____

VERIFICATION

State of New Jersey
County of Burlington

LIZA ORTIZ
NOTARY PUBLIC
STATE OF NEW JERSEY
My Commission Expires November 27, 2028

Subscribed in my presence and sworn to before me on this: 10/23/2024

_____
Notary Public
Notarized remotely online using communication technology via Proof.

PUBLIC NOTICE

Reunión Pública de Alcance para la Declaración de Impacto Ambiental Suplementaria para la Expansión y Modernización del Puerto de Entrada Terrestre Raúl Héctor Castro y el Puerto de Entrada Terrestre Comercial Propuesto

La Administración de Servicios Generales (GSA, por sus siglas en inglés) de los Estados Unidos notifica anticipadamente al público la intención de la agencia de preparar una Declaración de Impacto Ambiental Suplementaria (SEIS, por sus siglas en inglés) para analizar los impactos potenciales resultantes de la propuesta de realineación y reconstrucción del Canal de la Avenida Rosa y la construcción de una nueva cuenca de retención de aguas pluviales al oeste del Puerto de Entrada Terrestre (LPOE por sus siglas en inglés) Raúl Héctor Castro (RHC por sus siglas en inglés), ampliado y modernizado.

Esta SEIS complementará la anterior Declaración de Impacto Ambiental (EIS) para el proyecto de ampliación y modernización del LPOE RHC. La GSA firmó el Registro de Decisión (ROD) para la EIS para la Ampliación y Modernización del LPOE RHC y el LPOE Comercial Propuesto en Douglas, Arizona, el 6 de mayo de 2024. La GSA aprobó la alternativa preferida, identificada en la EIS Final como Alternativa 2 (Construcción Concurrente - Expansión hacia el oeste), que implicaría la construcción de un nuevo LPOE Comercial y la expansión por fases y modernización del LPOE RHC existente al mismo tiempo, con la expansión principalmente hacia el oeste del LPOE RHC existente.

Según la Acción Propuesta para la SEIS, la alcantarilla de concreto existente bajo el LPOE se mantendría parcialmente y se ampliaría hacia el oeste cerca de las cabinas de inspección de vehículos existentes. A partir de ahí, se construiría un canal abierto, generalmente paralelo y al norte de Border Road, que desembocará en una cuenca existente al oeste de Chino Road. También se construiría una cuenca de retención de aguas pluviales ampliada al oeste del LPOE RHC ampliado y modernizado. La realineación del canal de inundación abordaría y mejoraría la gestión global de las aguas pluviales y los problemas de control de inundaciones, así como la eficiencia de las operaciones portuarias en el ampliado y renovado RHC LPOE. La construcción tendría en cuenta los requisitos de las ordenanzas locales y del condado en materia de llanuras aluviales, así como el cumplimiento de las normas P100 de la GSA. Además de la Acción Propuesta, la SEIS considerará la Alternativa de No Acción, en la que la GSA no procede con la Acción Propuesta.

Una parte de la Acción Propuesta, en la que está planeada la demolición del canal de aguas pluviales existente, se encuentra dentro de una llanura aluvial designada de 1 por ciento de probabilidad anual o de 0.2 por ciento de probabilidad anual (llanura aluvial de 100 años y 500 años, respectivamente), que se encuentra directamente al oeste del LPOE RHC. En virtud de la Orden Ejecutiva (O.E.) 11988 (*Gestión de llanuras inundables*) y O.E. 13690 («*Establecimiento de una norma federal de gestión del riesgo de inundación y de un proceso para solicitar y tener en cuenta las aportaciones de las partes interesadas*»), la GSA está obligada a revisar el proyecto en busca de posibles soluciones alternativas a la Acción Propuesta.

Las agencias con las que se está contactando para que contribuyan al análisis del proyecto son similares a las identificadas en la EIS final para el proyecto de ampliación y modernización del LPOE RHC e incluyen la Agencia Federal de Gestión de Emergencias (FEMA), el Cuerpo de Ingenieros del Ejército de los Estados Unidos (USACE) y las oficinas estatales, del condado y locales aplicables.

Se anima al público a asistir y participar en la reunión de alcance. El objetivo de esta reunión es facilitar información sobre el proyecto y recabar la opinión del público sobre los recursos y cuestiones importantes, lo que ayudará a determinar el alcance y contenido de la SEIS. La reunión de alcance tendrá lugar el **jueves 24 de octubre**, de 4:00 p.m. a 6:00 p.m., en: Douglas Visitor Center, 345 16th Street, Douglas, Arizona, 85607

Los comentarios deben recibirse antes del **11 de noviembre de 2024** y pueden presentarse en la reunión de evaluación del alcance, por correo electrónico a osmahn.kadri@gsa.gov (*incluya* «Douglas Scoping Comment» *en el asunto*), o por correo a:

Con atención 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 más información sobre el proyecto, visite:https://www.gsa.gov/about-us/regions/welcome-tc-the-pacific-rim-region-9/land-ports-of-entry/raul-hector-castro-land-port-of-entry

Para más información o si necesita ayuda especial para asistir y participar en la reunión pública, póngase en contacto con Osmahn Kadri, GSA NEPA gerente de proyectos, en el 415-522-3617.

Publish: October 11, 16 and 20, 2024

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ATTACHMENT C: LETTER TO INTERESTED PARTIES

GSA Pacific Rim Region

October 11, 2024

Dear Interested Reader,

Please be advised that the U.S. General Services Administration (GSA) gives early notification of the agency's intent to prepare a Supplemental Environmental Impact Statement (SEIS) to analyze the potential impacts resulting from a proposed flood channel realignment and new stormwater retention basin to the west of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) in Douglas, Arizona.

This SEIS will supplement the previous Environmental Impact Statement (EIS) for the RHC LPOE expansion and modernization project. GSA signed the Record of Decision (ROD) for the Final EIS on May 6th, 2024. GSA approved the preferred alternative, identified in the Final EIS as Alternative 2 (Concurrent Construction – Westward Expansion), which would involve construction of a new Commercial LPOE and phased expansion and modernization of the existing RHC LPOE at the same time, with expansion primarily to the west of the existing RHC LPOE.

The purpose of the Proposed Action is to address and improve overall stormwater management and flood control needs, as well as improve port operation efficiency at the expanded and modernized RHC LPOE. The need for the Proposed Action is that the current alignment of the Rose Avenue Channel would result in engineering conflicts with the current proposed layout for the expanded RHC LPOE and requires re-routing. Additional land area is also required for necessary stormwater retention at the expanded and modernized RHC LPOE. The SEIS will consider one **"action" alternative** and one "**no action" alternative**.

Key components of Alternative 1 would include:

- Acquiring necessary land and right-of-way permissions for the stormwater channel route and retention pond.
- Constructing a 2,500-foot-long stormwater channel from the LPOE to an unnamed wash west of Chino Road, designed as either an open concrete-lined or rip-rapped-lined channel.
- Evaluating and improving the existing concrete box culvert (CBC) beneath the LPOE, maintaining a portion in place and extending it westward.
- Improving the Chino Road hydraulic structure where it crosses an unnamed wash, including necessary road repairs.
- Constructing a 5-acre retention pond between the LPOE and Chino Road, north of the proposed stormwater channel.

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 stormwater management and flood control issues identified within the proposed design for the expanded and modernized RHC LPOE would not be addressed.

The SEIS will examine potential environmental impacts of the proposed channel realignment, considering air quality and greenhouse gases from emissions; geology and soils and water resources from ground disturbance; and biological resources from ground disturbance and construction noise. Minimal or no impacts are expected to occur to the following resources:

transportation and traffic; noise; socioeconomics, and environmental justice. Beneficial impacts are expected to infrastructure and utilities from the improvement of stormwater management facilities. GSA will be conducting a jurisdictional determination, archaeological survey, and Phase I Environmental Site Assessment to inform potential impacts to Waters of the United States, cultural resources, and human health and safety, respectively.

A portion of the Proposed Action, where demolition of the existing stormwater channel is planned, is located within a designated 1-percent-annual-chance floodplain or 0.2-percent-annual-chance floodplain (100-year and 500-year floodplain, respectively), which is located directly to the west of the RHC LPOE. Under Executive Order (E.O.) 11988 (*Floodplain Management*) and E.O. 13690 (*Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input*), GSA is required to review the project for possible alternative solutions to the Proposed Action. Construction would consider local and county floodplain ordinance requirements as well as adhere to GSA P100 standards.

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 SEIS. The scoping meeting for the SEIS will be held on Thursday, October 24th, 2024 from 4:00 p.m. 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. **No formal presentation will be provided.**

Agencies that are being contacted for input into the analysis of the project are similar to those identified in the Final EIS for the RHC LPOE expansion and modernization project and include the Federal Emergency Management Agency (FEMA), the U.S. Army Corps of Engineers (USACE), and applicable state, county, and local offices.

Interested parties are encouraged to attend and provide written comments regarding the scope of the SEIS. Scoping comments must be received by November 11th, 2024 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* (*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

Further information on the project may be found online 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

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.

Para obtener más información o si necesita ayuda especial para asistir y participar en la reunión pública, comuníquese con Osmahn Kadri, gerente de proyectos de GSA NEPA, al 415-522-3617.

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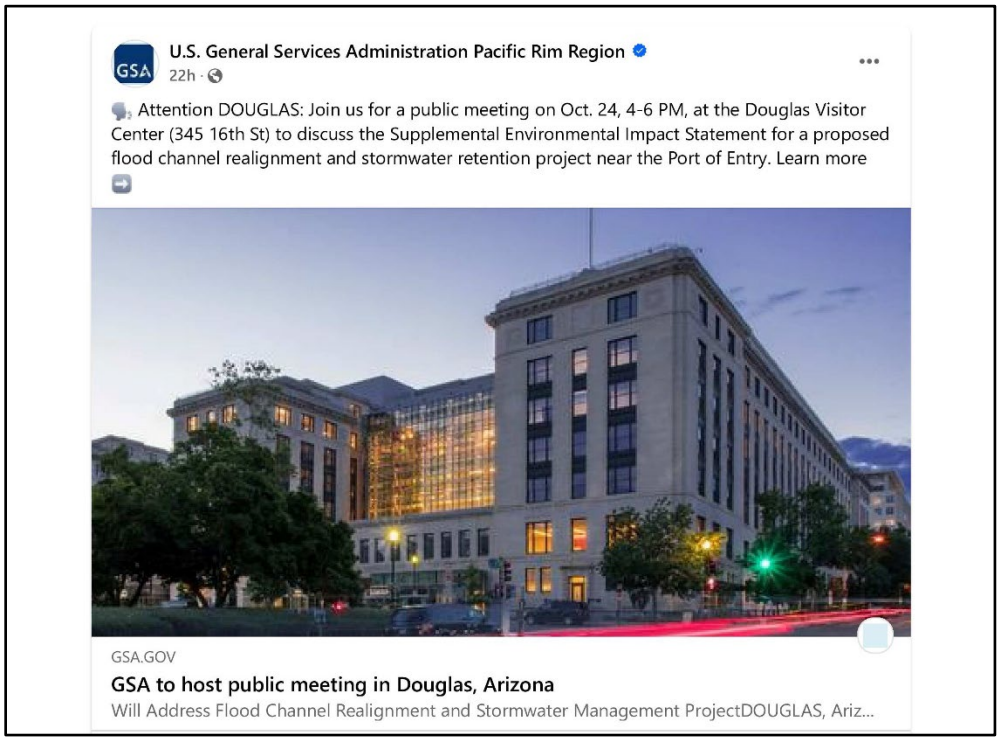
ATTACHMENT D: ADVERTISING ON SOCIAL MEDIA

Social Media Posts by GSA

Facebook



Twitter

GSA Website

An official website of the United States government

U.S. General Services Administration

GSA to host public meeting in Douglas, Arizona

October 15, 2024

Will Address Flood Channel Realignment and Stormwater Management Project

DOUGLAS, Ariz. — The U.S. General Services Administration (GSA) will host a public scoping meeting to discuss the Supplemental Environmental Impact Statement (SEIS) for a proposed flood channel realignment and stormwater retention basin project near the Raul Hector Castro Land Port of Entry in Douglas, Arizona.

The public is invited to attend the meeting on **Thursday, October 24, 2024**, from **4 to 6 p.m. local time** at the **Douglas Visitor Center, located at 345 16th Street in Douglas, AZ**.

The meeting will be conducted in an informal open house format, where project information will be displayed, and attendees will have the opportunity to engage in one-on-one discussions with GSA representatives. No formal presentation will be provided.

The SEIS will evaluate the potential environmental impacts of the proposed flood channel realignment and the construction of a new stormwater retention basin, aimed at improving stormwater management and flood control in the area. This project will address engineering conflicts with the existing Rose Avenue Channel, and the need for additional land for stormwater retention as part of the ongoing modernization and expansion of the Castro Land Port of Entry. In addition to the Proposed Action, the SEIS will include a No Action alternative, providing a baseline for comparison under the National Environmental Policy Act .

Interested parties are encouraged to participate and provide comments regarding the scope of the SEIS. Written comments can be submitted at the meeting, via email to osmahn.kadri@gsa.gov (with "Douglas Scoping Comment" in the subject line), or by mail to:

Osmahn Kadri, NEPA Project Manager
General Services Administration
c/o Potomac-Hudson Engineering, Inc.
77 Upper Rock Circle, Suite 302
Rockville, MD 20850

###

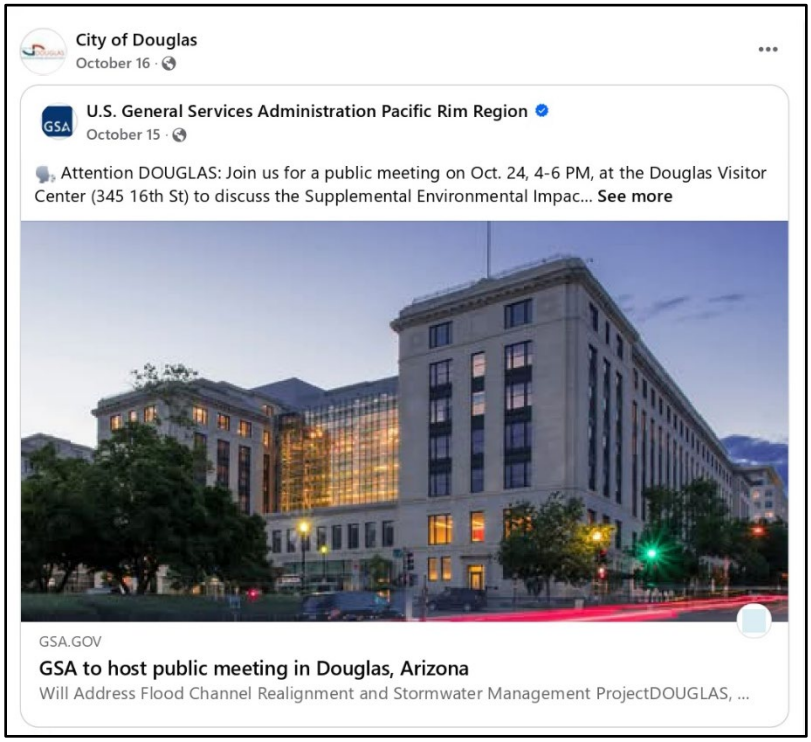
About GSA: GSA provides centralized procurement and shared services for the federal government, managing a nationwide real estate portfolio of nearly 370 million rentable square feet, overseeing about $100 billion in products and services via federal contracts, and delivering technology services that serve millions of people across dozens of federal agencies. GSA's mission is to deliver the best customer experience and value in real estate, acquisition, and technology services to the government and the American people. For more information, visit; GSA.govand follow us at @USGSA .

Christi Chidester Votisek
Public Affairs Officer

Northwest/Arctic Region

Social Media Posts by the City of Douglas

Facebook



Twitter


Douglas Arizona reposted
GSA Pacific Rim @US_GSAR9 · Oct 15
Attention DOUGLAS: Join us for a public meeting on Oct. 24, 4-6 PM, at the Douglas Visitor Center (345 16th St) to discuss the Supplemental Environmental Impact Statement for a proposed flood channel and
Douglas Arizona
720 posts
Follow
gsa.gov
GSA to host public meeting in Douglas, Arizona
Will Address Flood Channel Realignment and Stormwater Management ProjectDOUGLAS, Ariz. ...
1
5
2
202


Douglas Arizona reposted
GSA Pacific Rim @US_GSAR9 · Oct 15
Atención DOUGLAS: Únete a la reunión pública el 24 de oct., de 4-6 PM en el Centro de Visitantes (345 16th St) para discutir el proyecto de realineación de canales de inundación y retención de aguas pluviales cerca del Puerto de Entrada. Más info
gsa.gov
La GSA organizará una reunión pública en Douglas, A
Abordará el proyecto de realineación del canal de inundación y la gestión de aguas ...
4
1
103

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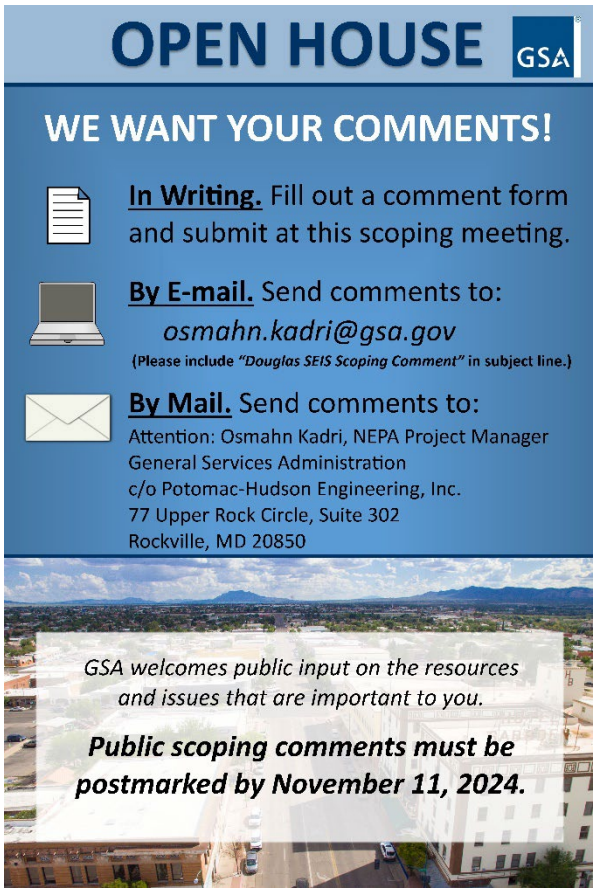
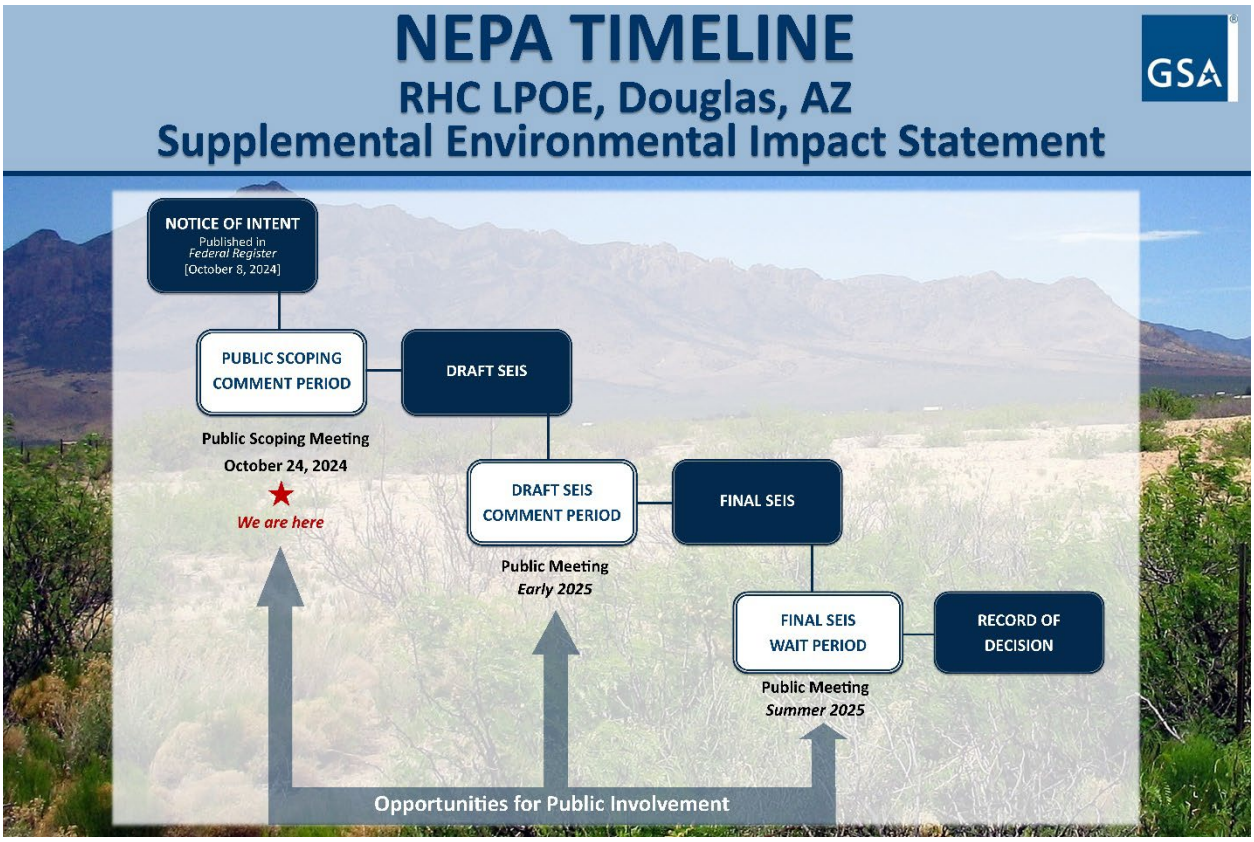
ATTACHMENT E: SCOPING MEETING POSTER DISPLAYS


WELCOME
GSA
SUPPLEMENTAL
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
PUBLIC SCOPING MEETING
October 24, 2024
Douglas Visitor Center
4:00 PM to 6:00 PM


OPEN HOUSE
GSA
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 SEIS 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 postmarked by November 11, 2024.


NEPA TIMELINE
RHC LPOE, Douglas, AZ
Supplemental Environmental Impact Statement
GSA
NOTICE OF INTENT
Published in Federal Register
[October 8, 2024]
PUBLIC SCOPING COMMENT PERIOD
DRAFT SEIS
Public Scoping Meeting
October 24, 2024
We are here
DRAFT SEIS COMMENT PERIOD
FINAL SEIS
Public Meeting
Early 2025
FINAL SEIS WAIT PERIOD
RECORD OF DECISION
Public Meeting
Summer 2025
Opportunities for Public Involvement


National Environmental Policy Act
GSA
KEY STEPS
Final EIS and ROD
• The U.S. General Services Administration (GSA) completed the Final Environmental Impact Statement (EIS) for the Raul Hector Castro (RHC) Land Port of Entry (LPOE) expansion and modernization project. GSA signed the Record of Decision (ROD) for the Final EIS on May 14, 2024, approving the preferred alternative, identified as Alternative 2.
• GSA internally concludes that the Rose Avenue Channel in its existing state could interfere with the engineering of the expanded and modernized RHC LPOE, and that additional stormwater retention is needed for the expanded LPOE.
Public Scoping Period
• GSA publishes a Notice of Intent on October 8, 2024 in the *Federal Register* to prepare a Supplemental EIS (SEIS) for public review and announces a Public Scoping Meeting to describe the project, solicit comments, and listen to community concerns and interests before preparation of the SEIS. The Public Scoping Period begins on October 11, 2024; during this period the public may submit comments on issues that should be considered in the SEIS. Public Scoping Period ends November 11, 2024.
• October 24, 2024, GSA conducts a Public Scoping Meeting at the Douglas Visitor Center, AZ. *[WE ARE HERE]*
Develop Draft SEIS
• Draft SEIS developed to analyze potential impacts to the natural and human environment.
• Public comments received during the Public Scoping Period are considered during the preparation of the Draft SEIS.
• Required consultations initiated with federal and state agencies to comply with laws and regulations (e.g., Endangered Species Act, National Historic Preservation Act).
Public Comment Period
• GSA publishes a Notice of Availability in the *Federal Register* and local media informing the public that the Draft SEIS is available for public review (*Early 2025*).
• 45-day Public Comment Period, which will include a public meeting.
• Written comments on the contents of the Draft SEIS accepted via U.S. mail, e-mail, or in-person at the public meeting.
Develop Final SEIS
• Complete required consultations with agencies.
• Review, consider, and address, as appropriate, the public comments received.
• Revise and finalize the SEIS.
Final SEIS and ROD Issued
• Final SEIS is completed. [*Summer 2025*]
• Prepare a ROD.
• 30-day waiting period, which may include a public meeting.
• Written comments on the contents of the Final SEIS accepted via U.S. mail, e-mail, or in-person at a public meeting.
• After no less than 30 days, sign the ROD.
• Implement the decision selected in the ROD.
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.

PURPOSE AND NEED
RHC LPOE, Douglas, AZ
Supplemental Environmental Impact Statement

Purpose. The purpose of the Proposed Action considered within this Supplemental Environmental Impact Statement is for GSA to address and improve overall stormwater management and flood control needs, as well as improve port operation efficiency, at the expanded and modernized RHC LPOE as considered in the May 2024 Record of Decision.

Need. The Proposed Action is needed to:

- Avoid engineering conflicts with the current proposed layout for the expanded and modernized RHC LPOE;
- Divert stormwater away from and reduce flooding risks at the RHC LPOE;
- Provide sufficient stormwater retention capacity for the expanded and modernized RHC LPOE; and
- Enhance the overall functionality and safety of the LPOE.

The purpose and need for the overall RHC LPOE Expansion and Modernization project as considered in the May 2024 Record of Decision remains the same.

PROPOSED ACTION AND ALTERNATIVES
RHC LPOE, Douglas, AZ
Supplemental Environmental Impact Statement

The proposed project aims to enhance stormwater management and flood control at the RHC LPOE in Douglas, AZ. The SEIS will consider one **"action"** alternative.

- **Alternative 1** (see Figure 1): Includes acquiring land for a new stormwater system; constructing a 2,500-foot channel to a nearby wash; improving existing infrastructure including a concrete box culvert and Chino Road's hydraulic structure; demolishing a segment of the current channel; and building a 5-acre retention pond. These project components would work together to address identified issues and modernize the LPOE's stormwater management and flood control capabilities.

GSA will also consider a **"no action"** alternative, which assumes that the stormwater management and flood control issues identified within the proposed design for the expanded and modernized RHC LPOE would not be addressed.

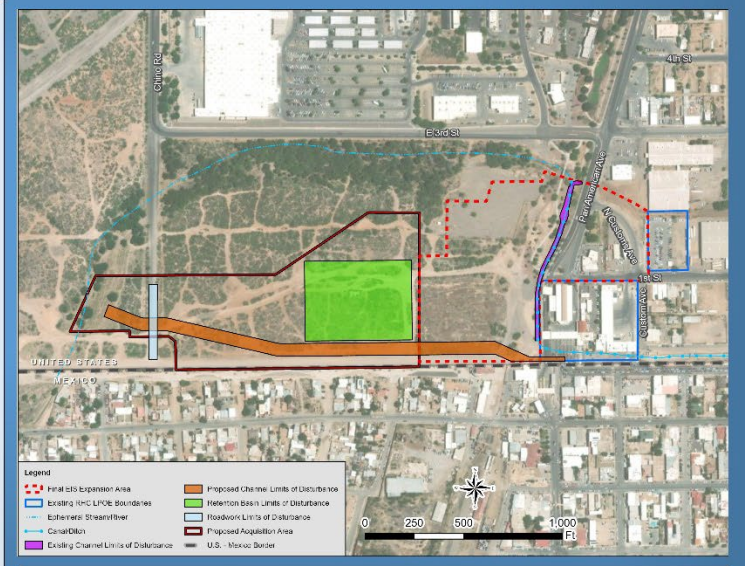


Figure 1. Alternative 1 Project Area

ATTACHMENT F: SCOPING COMMENT FORM

General Services Administration

Raul Hector Castro Land Port of Entry, Douglas, Arizona
Supplemental Environmental Impact Statement
PUBLIC SCOPING MEETING

COMMENT FORM

Please print clearly. Add extra pages if necessary.

My comment is about (check all that apply):

- ☐ Air Quality/Greenhouse Gases
- ☐ Biological Resources
- ☐ Cultural Resources
- ☐ Environmental Justice
- ☐ Geologic Resources
- ☐ Hazardous Waste and Materials
- ☐ Soils
- ☐ Land Use
- ☐ Noise
- ☐ Utilities and Infrastructure
- ☐ Socioeconomics
- ☐ Transportation and Traffic
- ☐ Visual Resources and Aesthetics
- ☐ Water Resources
- ☐ Human Health & Safety
- ☐ Other:_____

Name:

Organization, Title:

Address:

Email:

3 Ways to Submit Comments:

Public Scoping Meeting	E-mail	U.S. Mail
(Fill out comment form and submit at scoping meeting.)	osmahn.kadri@gsa.gov *(Include "Douglas Scoping Comment" in the subject line)*	Attention: Osmahn Kadri, NEPA Project Manager General Services Administration c/o Potomac-Hudson Engineering, Inc. 77 Upper Rock Circle, Suite 302 Rockville, MD 20850

Comments must be received by November 11, 2024

ATTACHMENT G: SCOPING MEETING HANDOUTS

GSA Pacific Rim Region

Supplemental 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

Public Scoping Meeting Handout

October 24, 2024, 4:00 p.m. – 6:00 p.m. MT

Introduction

The United States (U.S.) General Services Administration (GSA) is preparing a Supplemental Environmental Impact Statement (SEIS) to analyze the potential impacts resulting from a proposed flood channel realignment and expansion of retention basin to the west of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) in Douglas, Arizona. The purpose of the Proposed Action is to address and improve overall stormwater management and flood control needs, as well as improve port operation efficiency at the expanded and modernized RHC LPOE. The Proposed Action is needed to avoid engineering conflicts between the current alignment of the Rose Avenue Channel with the current proposed layout for the expanded and modernized RHC LPOE; to divert stormwater away from and reduce flooding risks at the RHC LPOE; to provide sufficient stormwater retention capacity for the expanded and modernized RHC LPOE; and to enhance overall functionality and safety.

Project Background

This SEIS supplements the previous Environmental Impact Statement (EIS) for the RHC LPOE expansion and modernization project. GSA signed the Record of Decision (ROD) for the Final EIS on May 14th, 2024, approving the preferred alternative, Alternative 2, which would involve construction of a new Commercial LPOE and phased expansion and modernization of the existing RHC LPOE at the same time, with expansion primarily to the west of the existing RHC LPOE.

The existing Rose Avenue Channel runs through the Alternative 2 Expansion Area and could create complications for construction and operation of the expanded and modernized RHC LPOE. To address these issues, GSA is proposing a project that includes realigning and reconstructing the Rose Avenue Channel, extending and improving the existing concrete box culvert, and constructing a new retention basin to the west of the RHC LPOE. The project also involves acquiring additional land and obtaining necessary permissions to implement these changes. The purpose and need for the overall RHC LPOE expansion and modernization project as considered in the May 2024 Record of Decision remains the same.

Further information on the RHC LPOE expansion and modernization project may be found online at: https://www.gsa.gov/about-us/gsa-regions/region-9-pacific-rim/land-ports-of-entry/raul-hector-castro-land-port-of-entry

Proposed Alternatives

The SEIS will consider one **"action"** alternative and one **"no action"** alternative. The one **"action"** alternative is described as follows:

- **Alternative 1**. Includes land acquisition, partial demolition of the existing Rose Avenue Channel, reconstruction and realignment of the channel to run north of Border Road, and construction of a new 5-acre stormwater retention basin to the west of the RHC LPOE.

The "no action" alternative assumes that GSA would not realign and reconstruct the Rose Avenue Channel or construct a new retention basin to the west of the RHC LPOE. The current stormwater management and flood control concerns at the RHC LPOE would not be addressed.

GSA Pacific Rim Region

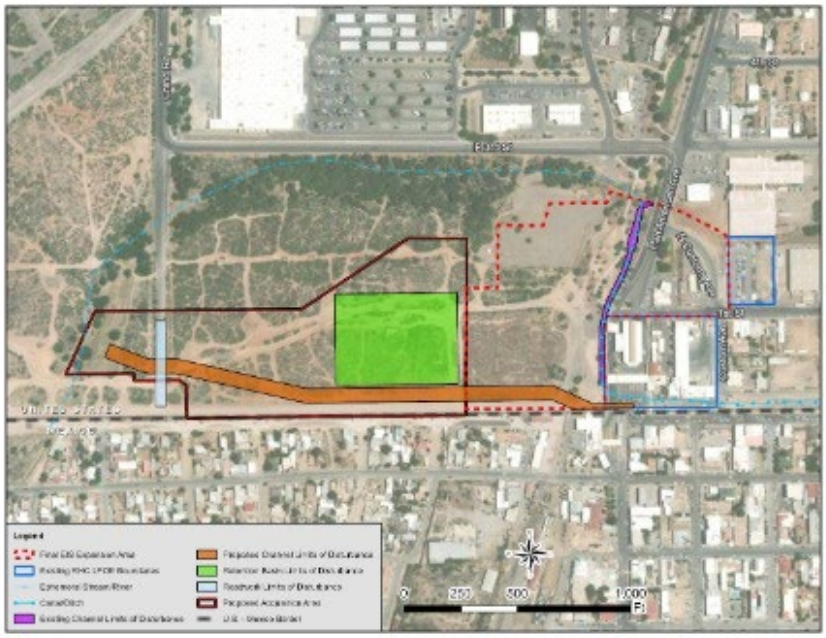


Figure 1. Location of Proposed Channel Reconstruction and Realignment

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 SEIS.

Scoping Comments

Scoping comments must be received by November 11, 2024 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*. Please reference "*Douglas SEIS 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.

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ATTACHMENT H: SCOPING MEETING SIGN-IN SHEETS

General Services Administration

GSA

Raul Hector Castro Land Port of Entry, Douglas, Arizona
Supplemental Environmental Impact Statement
PUBLIC SCOPING MEETING

SIGN-IN SHEET

By signing this form and attending this event, you agree to be photographed and videotaped by the U.S. General Services Administration without receiving compensation of any kind. You understand that the photographs or videos in which you may appear may be used, as deemed appropriate by GSA, in print and electronic media that may be viewed by the public and private sector audiences.

Please print clearly

Name	Organization	Mailing Address	E-mail Address	Would you like to be informed of project developments?
[illegible] C. Acos[illegible]	Douglas City Coun[illegible]	[redacted]		Yes
Ana Urquijo	City of Doug[illegible]			Yes
Lisa Enriquez	Cochise County			
Luis Pedroza	City of Douglas			yes
Xenia Gonzalez	City of Douglas			yes
Denise Machado	Abbott Realty			yes
Alfonso Munoz	Abbott Realty			yes
Sharon Gilman	Cochise County			yes
[illegible]	Vestirsibene			yes

Date:

General Services Administration

Raul Hector Castro Land Port of Entry, Douglas, Arizona
Supplemental Environmental Impact Statement
PUBLIC SCOPING MEETING

Name	Organization	Mailing Address	E-mail Address	Would you like to be informed of project developments?
Karleen Gomez	Candidate BOS D2	[redacted]		
Dr. M.V. Gomez	Retired ex mayor			
Wendy Gomez				
Oscar [illegible]osola	OS/LINT.			
Eddie Gonzales				

Date:

SIGN-IN SHEET

By signing this form and attending this event, you agree to be photographed and videotaped by the U.S. General Services Administration without receiving compensation of any kind. You understand that the photographs or videos in which you may appear may be used, as deemed appropriate by GSA, in print and electronic media that may be viewed by the public and private sector audiences.

Please print clearly

Name	Organization	Mailing Address	E-mail Address	Would you like to be informed of project developments?
Frank Ambriz	Private	[redacted]		
Jennifer Smith	City of Douglas			
Brian Lopez	City of Douglas			

Date:

Name	Organization	Mailing Address	E-mail Address	Would you like to be informed of project developments?
Ann English	Cochise County	[redacted]		Yes
Mitch Lindemann	Douglas			
Oscar Ramirez	CBP			Yes
JACKIE WATKINS	Cochise County			—
KEITH DENNIS	SEAGO			Yes
Luis Ramirez	RAI-N			Yes.
Elise Moore	City of Douglas			yes
Alberto Reyes	Cochise County			yes
Donald Huish	City of Douglas			
Casandra Lamer	City of Douglas			yes
STEVEN HELFRICH				
DANE GOSEN	FMI			Y

Date:

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ATTACHMENT I: ORIGINAL COMMENT LETTERS

A1: United States Fish and Wildlife Service

United States Department of the Interior
Fish and Wildlife Service
Arizona Ecological Services Office
9828 North 31st Avenue, Suite C3
Phoenix, Arizona 85051
Telephone: (602) 242-0210 Fax: (602) 242-2513

In reply refer to:
ECOSphere Number: 2023-0106212

November 1, 2024

Osmahn Kadri, NEPA Project Manager
U.S. General Services Administration
c/o Potomac-Hudson Engineering, Inc.
77 Upper Rock Circle, Suite 302
Rockville, Maryland, 20850

Dear Osmahn Kadri:

This letter documents our response to your intent to prepare a Supplemental Environmental Impact Statement (SEIS) and scoping request. We understand that the project under consideration is a proposed flood channel realignment and expansion of the current retention basin located west of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) in Douglas, Arizona.

We refer you to our submitted comments in response to your EIS Scoping request and public comment period for your Draft EIS for information on Section 7(a)(2) of the Endangered Species Act (ESA) and it's implementing regulations (50 CFR 402 *et seq*.) as well both 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.).

Here we address potential adverse impacts of the proposed flood channel realignment and expansion of the current retention basin on federally listed species and designated critical habitats. We acknowledge your use of our Information for Planning and Consultation (IPaC) tool and request of an official species list from our office on July 19, 2023, which identified 9 species that could be affected by the proposed project.

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 from project implementation. Specifically, we encourage you to consider the following:

Construction Noise: Project implementation is likely to increase the ambient noise levels from construction activities and equipment. Several species that could occur within the action area are sensitive to anthropogenic disturbance and could experience adverse effects.

Habitat Alteration: Project implementation is likely to alter specific components of habitat through vegetation removal, dust creation, and altered hydrology, as ground and soil disturbance.

Osmahn Kadri

These components may alter foraging, nesting, roosting, or prey availability for federally listed species.

Sedimentation and Water Diversion: Water is a critical component in shaping habitats in arid environments. The quantify and timing of water often determines the floral and faunal communities of an area. Altering flow and increasing sedimentation could adversely affect local ecosystem processes upon which listed species rely.

Thank you for considering threatened and endangered species in your project design. If you have specific project-related concerns about species that occur within the action area, we are happy to provide technical assistance.

In addition, we urge you coordinate project planning with potentially interested tribes that may have cultural affiliations in the area of project implementation, as tribal consultation is vital to the preservation of tribal culture.

Lastly, also recommend you seek additional information and coordinate your project with the Arizona Game and Fish Department. 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 (https://www.azgfd.com/wildlife/planning/projevalprogram/).

Please continue to coordinate with our Arizona Ecological Services Office in Tucson throughout the design and implementation of the proposed project. For further assistance, please contact Cassondra Walker (cassondra_walker@fws.gov) or Julie McIntyre (julie_mcintyre@fws.gov). Please refer to the project number 2023-0106212. Thank you for your continued efforts to conserve endangered species.

Sincerely,

JULIE MCINTYRE

Digitally signed by JULIE MCINTYRE
Date: 2024.11.01 13:02:03 -07'00'

for Heather Whitlaw
Field Supervisor

Cc (electronic):

Preservation Officer, Cultural Preservation Office, Hopi Tribe, Kykotsmovi, AZ

Preservation Officer, Historic Preservation Office, Pascua Yaqui Tribe, Tucson, AZ

Director, Historic Preservation and Archaeology Department, San Carlos Apache Tribe, San Carlos, AZ

Manager, Cultural Affairs, Tohono O'odham Nation, Sells, AZ

Cultural Coordinator, Environmental Programs, Fort Sill Apache Tribe, Apache, OK

U.S. FISH AND WILDLIFE SERVICE
REGION 2—SOUTHWEST
ARIZONA, NEW MEXICO, OKLAHOMA, TEXAS

Osmahn Kadri

Branch Chief, Environmental Quality Services, Western Regional Office, Bureau of Indian Affairs, Phoenix, AZ

Branch of Environmental Review, Fish and Wildlife Service, Albuquerque, NM

Native American Liaison, Fish and Wildlife Service, Albuquerque, NM

Tribal Coordinator, Fish and Wildlife Service, Flagstaff, AZ

Project Evaluation Program, Arizona Game and Fish Department, Phoenix, AZ

U.S. FISH AND WILDLIFE SERVICE
REGION 2—SOUTHWEST
ARIZONA, NEW MEXICO, OKLAHOMA, TEXAS

A2: Arizona Game and Fish Department

November 04, 2024

Mr. Osmahn Kadri
U.S. General Services Administration
c/o Potomac-Hudson Engineering, Inc.
77 Upper Rock Circle, Suite 302
Rockville, MD 20850

Electronically submitted to: osmahn.kadri@gsa.gov

RE: Supplemental Environmental Impact Statement (SEIS) for the Expansion and Modernization of the Raul Hector Castro Land Port of Entry and Proposed Commercial Land Port of Entry Scoping

Dear Mr Kadri:

The Arizona Game and Fish Department (Department) appreciates the invitation to review and comment on the Scoping for the Supplemental Environmental Impact Statement (SEIS) for the Raul Hector Castro Land Port of Entry and Proposed Commercial Land Port of Entry. The Department understands the purpose of the United States (U.S.) General Services Administration (GSA) proposed action is to analyze the potential impacts resulting from a proposed flood channel realignment and expansion of the retention basin to the west of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) in Douglas, Arizona. The Proposed Action aims to address and improve overall stormwater management and flood control needs, as well as improve port operation efficiency at the expanded and modernized RHC LPOE. The Proposed Action is needed to avoid engineering conflicts between the current alignment of the Rose Avenue Channel with the current proposed layout for the expanded and modernized RHC LPOE; to divert stormwater away from and reduce flooding risks at the RHC LPOE; to provide sufficient stormwater retention capacity for the expanded and modernized RHC LPOE; and to enhance overall functionality and safety.

The Department further understands the existing Rose Avenue Channel runs through the Alternative 2 Expansion Area and could create complications for construction and operation of the expanded and modernized RHC LPOE. To address these issues, GSA is proposing a project that includes realigning and reconstructing the Rose Avenue Channel, extending and improving the existing concrete box culvert, and constructing a new retention basin to the west of the RHC LPOE. The project also involves acquiring additional land and obtaining necessary permissions to implement these changes. The purpose and need for the overall RHC LPOE expansion and modernization project as considered in the May 2024 Record of Decision remains the same.

azgfd.gov | 520.628.5376
TUCSON OFFICE: 555 N. GREASEWOOD ROAD, TUCSON AZ 85745

Habitat in the project area consists of desert scrub and semi-desert grasslands, with large well-spaced scrub shrubs intermixed with short grasses.

Under Title 17 of the Arizona Revised Statutes, the Department, by and through the Arizona Game and Fish Commission, has jurisdictional authority and public trust responsibilities to conserve and protect the state fish and wildlife resources. In addition, the Department manages threatened and endangered species through authorities of Section 6 of the Endangered Species Act and the Department's Section 10(a)(1)(A) permit. It is the mission of the Department to conserve and protect Arizona's diverse fish and wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations. For your consideration, the Department provides the following comments based on the agency's statutory authorities, public trust responsibilities, and special expertise related to wildlife resources and recreation.

The Department understands the importance and need for increased capacity of CBP's infrastructure at the U.S.-Mexico border and provides the following recommendations to aid in the conservation and protection of Arizona's diverse biological resources:

- A report was created for the proposed supplemental action site by the Arizona Online Environmental Review Tool (ERT) on October 31, 2024. The ERT report (see attached HGIS-23444) indicates that western burrowing owl, a special status species that is regulated under the Migratory Bird Treaty Act (MBTA), could occur within the project footprint. If suitable habitat for this species is present within or adjacent to the project area, the Department recommends conducting an occupancy survey to determine if this species occurs within the project footprint. Guidelines for conducting this survey are found in *Burrowing Owl Project Clearance Guidance for Landowners*[1]. Please note that the survey should be conducted by a surveyor who is certified by the Department or has similar training and qualifications. If an active burrowing owl burrow is detected, please contact the Department and the U.S. Fish and Wildlife Service[2] (USFWS) for direction, in accordance with the Guidelines.

- Vegetation within the project area may provide nesting opportunities for avian species regulated under the MBTA and protected under state law. Breeding season for birds (including raptors) in the project vicinity is generally January through the end of June. If clearing or trimming occurs during the breeding season the Department recommends a qualified biologist conduct surveys for nesting birds within the project area prior to removal or trimming of vegetation. If nesting birds are present, delay implementing the project until after the nesting season. If that is not possible or if it is anticipated the project will not be in compliance with MBTA, the Department recommends contacting the USFWS for technical assistance. The USFWS will provide options to comply with the MBTA.

[1] https://s3.amazonaws.com/azgfd-portal-wordpress/PortalImages/files/wildlife/nongame/eagles/BurrowingOwlClearanceProtocol_2009.pdf
[2] https://www.fws.gov/office/arizona-ecological-services/contact-us

- If trenching or digging of large holes will occur, the Department recommends that trenching/digging and backfilling crews work together to minimize the amount of open trenches at any given time. Where trenches/holes cannot be backfilled immediately, the Department recommends escape ramps be constructed in each hole and at least every 90 meters in trenches. Escape ramps can be short lateral trenches or wooden planks sloping to the surface. The Department recommends that slopes be less than 45 degrees (1:1) and trenches and holes that have been left open be inspected to remove animals prior to backfilling.

- Invasive plant species can have detrimental effects on local ecosystems and fire regimes. As construction efforts will cause ground disturbance in which many invasive plant species could thrive, the Department recommends minimizing the potential introduction or spread of exotic invasive species by taking precautions such as washing and/or decontaminating all equipment utilized in the project activities before entering and leaving the site. Additionally, the Department recommends GSA employ invasive vegetation monitoring and treatment post construction. Please review the Arizona Department of Agriculture's website for a list of prohibited and restricted noxious weeds[3] and the Arizona Native Plant Society[4] for recommendations on control methods. To view a list of documented invasive species or to report invasive species in or near your project area visit iMapInvasives[5] – a national cloud-based application for tracking and managing invasive species.

Thank you for the opportunity to provide input on the Scoping for the Supplemental Environmental Impact Statement for the Raul Hector Castro Land Port of Entry and Proposed Commercial Land Port of Entry. For further coordination, please contact Laura Paulson, Region 5 Habitat Program Manager at lpaulson@azgfd.gov or (520) 388-4447.

Sincerely,

Raul A Vega

Raul Vega
Regional Supervisor

cc: Callie Calvacant, Habitat, Evaluation and Lands Branch Chief, AZGFD
Ginger Ritter, Project Evaluation Program Supervisor, AZGFD
Project Evaluation Program, AZGFD

AZGFD #M24-10215317

[3] https://agriculture.az.gov/pestspest-control/agriculture-pests/noxious-weeds
[4] https://aznps.com/invas
[5] https://imap.natureserve.org/imap/services/page/map.html

Arizona Environmental Online Review Tool Report

Arizona Game and Fish Department Mission
To conserve Arizona's diverse wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations.

The Department requests further coordination to provide project/species specific recommendations. Please use the Project Evaluation Form to submit your project to the Project Evaluation Program at PEP@azgfd.gov.

Project Name:
Raul Castro LPOE Proposed Channel Reconstruction and Realignment

Project Type:
Water Use, Transfer, and Channel Activities, Water diversion/channelization

Project ID:
HGIS-23444

Project Description:
Proposed Channel Reconstruction and Realignment required for expansion of the Raul Castro LPOE in Douglas, Arizona. Current channel causes engineering conflicts with the expansion design, therefore a channel realignment and construction of a new detention basin is required.

Contact Person:
Laura Paulson

Organization:
Arizona Game and Fish Department

On Behalf Of:
AZGFD

Page 1 of 11

Disclaimer:

1. This Environmental Review is based on the project study area that was entered. The report must be updated if the project study area, location, or the type of project changes.
2. This is a preliminary environmental screening tool. It is not a substitute for the potential knowledge gained by having a biologist conduct a field survey of the project area. This review is also not intended to replace environmental consultation (including federal consultation under the Endangered Species Act), land use permitting, or the Departments review of site-specific projects.
3. The Departments Heritage Data Management System (HDMS) data is not intended to include potential distribution of special status species. Arizona is large and diverse with plants, animals, and environmental conditions that are ever changing. Consequently, many areas may contain species that biologists do not know about or species previously noted in a particular area may no longer occur there. HDMS data contains information about species occurrences that have actually been reported to the Department. Not all of Arizona has been surveyed for special status species, and surveys that have been conducted have varied greatly in scope and intensity. Such surveys may reveal previously undocumented population of species of special concern.
4. Arizona Wildlife Conservation Strategy (AWCS), specifically Species of Greatest Conservation Need (SGCN), represent potential species distribution models for the State of Arizona which are subject to ongoing change, modification and refinement. The status of a wildlife resource can change quickly, and the availability of new data will necessitate a refined assessment.

Locations Accuracy Disclaimer:
Project locations are assumed to be both precise and accurate for the purposes of environmental review. The creator/owner of the Project Review Report is solely responsible for the project location and thus the correctness of the Project Review Report content.

Recommendations Disclaimer:

1. The Department is interested in the conservation of all fish and wildlife resources, including those species listed in this report and those that may have not been documented within the project vicinity as well as other game and nongame wildlife.
2. Recommendations have been made by the Department, under authority of Arizona Revised Statutes Title 5 (Amusements and Sports), 17 (Game and Fish), and 28 (Transportation).
3. Potential impacts to fish and wildlife resources may be minimized or avoided by the recommendations generated from information submitted for your proposed project. These recommendations are preliminary in scope, designed to provide early considerations on all species of wildlife.
4. Making this information directly available does not substitute for the Department's review of project proposals, and should not decrease our opportunity to review and evaluate additional project information and/or new project proposals.
5. Further coordination with the Department requires the submittal of this Environmental Review Report with a cover letter and project plans or documentation that includes project narrative, acreage to be impacted, how construction or project activity(s) are to be accomplished, and project locality information (including site map). Once AGFD had received the information, please allow 30 days for completion of project reviews. Send requests to:
   Project Evaluation Program, Habitat Branch
   Arizona Game and Fish Department
   5000 West Carefree Highway
   Phoenix, Arizona 85086-5000
   Phone Number: (623) 236-7600
   Fax Number: (623) 236-7366
   Or
   PEP@azgfd.gov
6. Coordination may also be necessary under the National Environmental Policy Act (NEPA) and/or Endangered Species Act (ESA). Site specific recommendations may be proposed during further NEPA/ESA analysis or through coordination with affected agencies.

Arizona Game and Fish Department
Project ID: HGIS-23444

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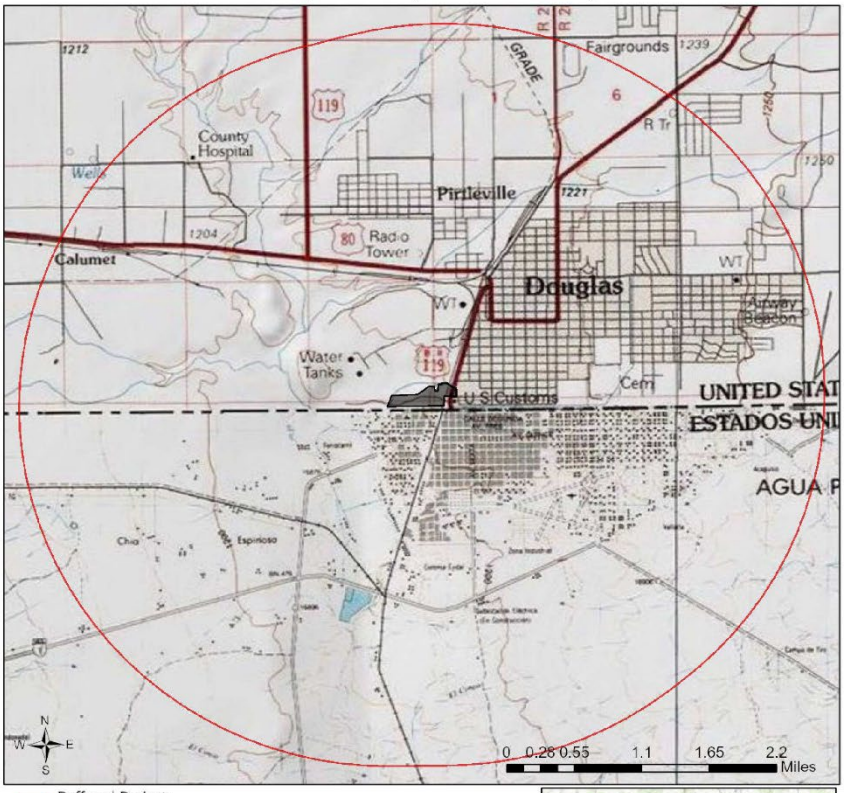
Raul Castro LPOE Proposed Channel Reconstruction and Realignment

USA Topo Basemap With Locator Map



Buffered Project Boundary

Project Boundary

Project Size (acres): 40.47

Lat/Long (DD): 31.3351 / -109.5634

County(s): Cochise

AGFD Region(s): Tucson

Township/Range(s): T24S, R27E

USGS Quad(s): DOUGLAS

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Arizona Game and Fish Department
Project ID: HGIS-23444

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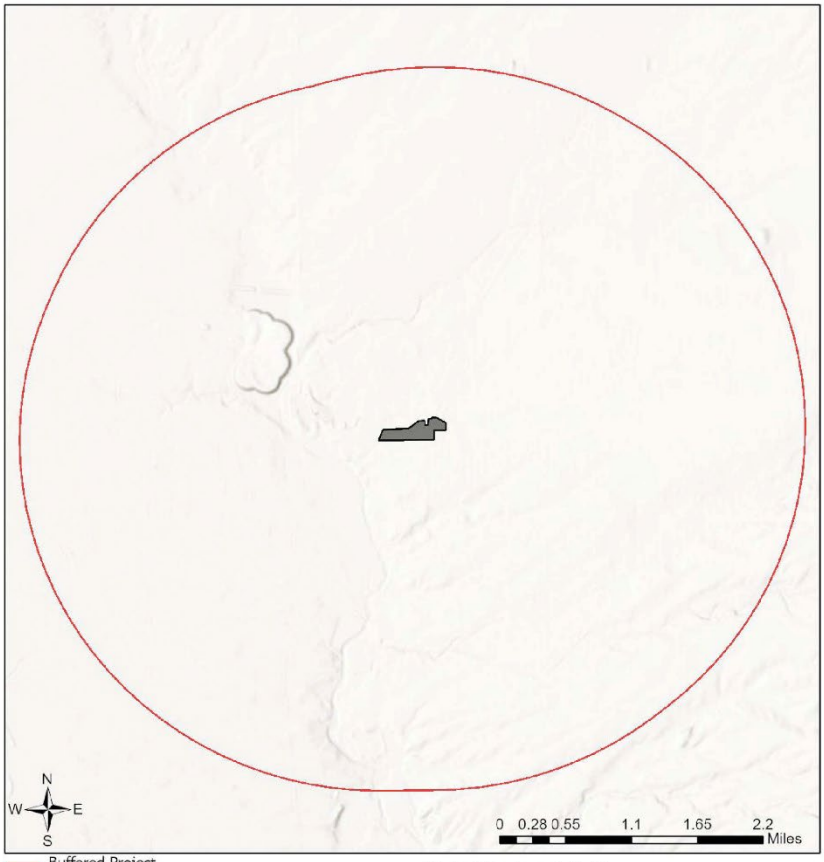
Raul Castro LPOE Proposed Channel Reconstruction and Realignment

Web Map As Submitted By User



Buffered Project Boundary

Project Boundary

Project Size (acres): 40.47
Lat/Long (DD): 31.3351 / -109.5634
County(s): Cochise
AGFD Region(s): Tucson
Township/Range(s): T24S, R27E
USGS Quad(s): DOUGLAS

Esri, NASA, NGA, USGS, FEMA

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Arizona Game and Fish Department
Project ID: HGIS-23444

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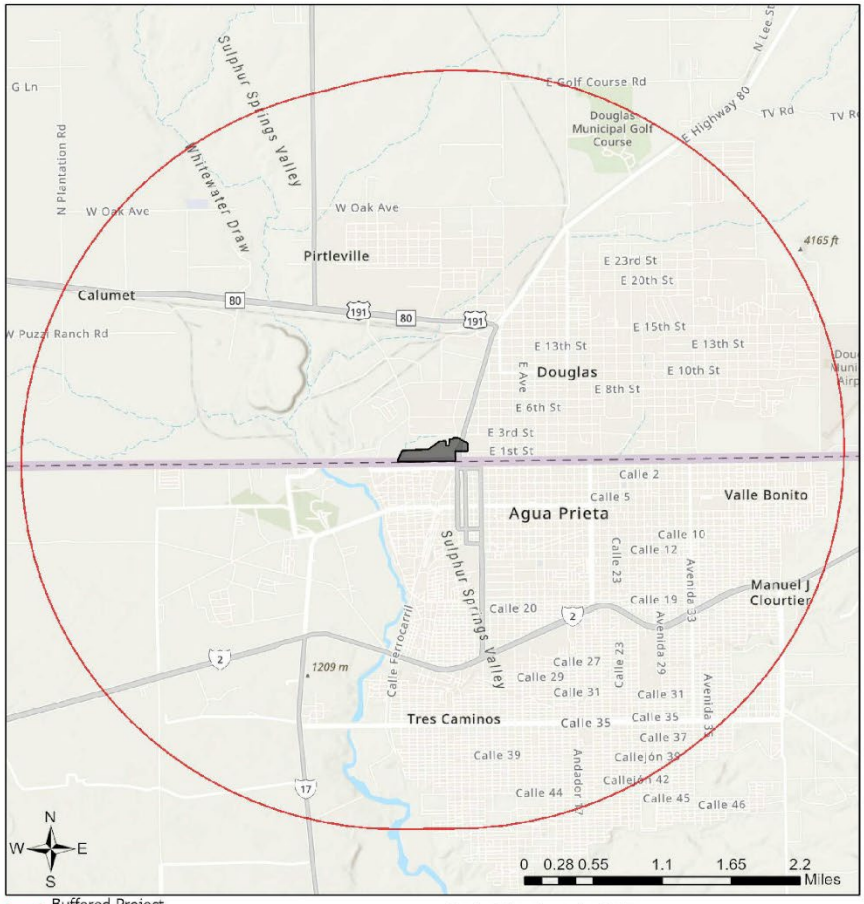
Raul Castro LPOE Proposed Channel Reconstruction and Realignment

Important Areas



- Buffered Project Boundary
- Project Boundary
- Important Bird Areas
- Critical Habitat
- Pinal County Riparian
- Wildlife Connectivity

Project Size (acres): 40.47
Lat/Long (DD): 31.3351 / -109.5634
County(s): Cochise
AGFD Region(s): Tucson
Township/Range(s): T24S, R27E
USGS Quad(s): DOUGLAS

Arizona Game and Fish Department
Project ID: HGIS-23444

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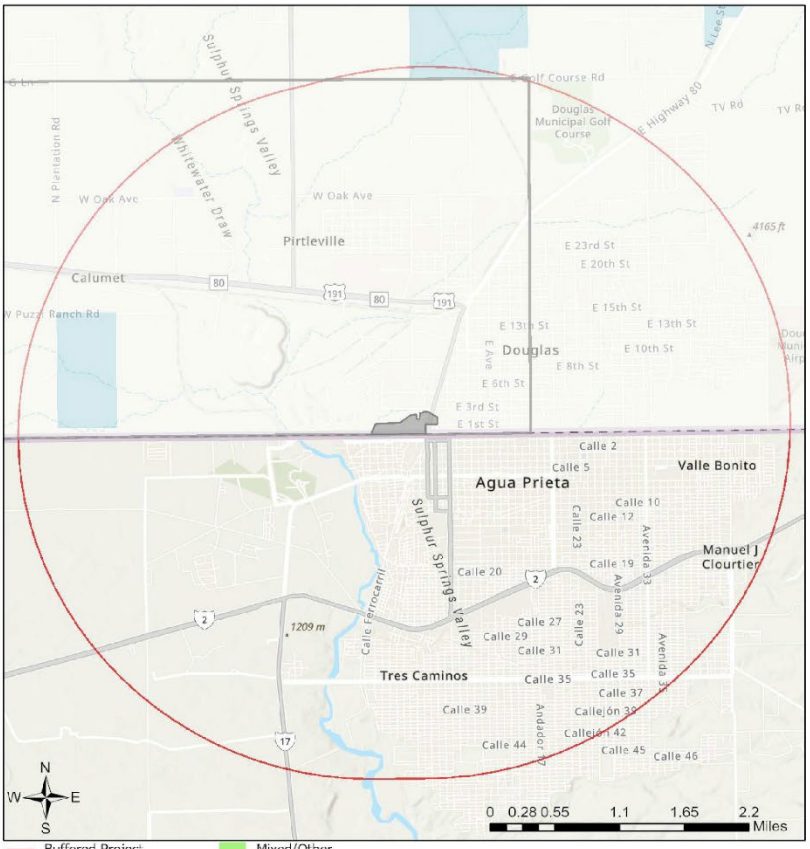
Raul Castro LPOE Proposed Channel Reconstruction and Realignment

Township/Ranges and Land Ownership



- Buffered Project Boundary
- Project Boundary
- AZ Game & Fish Dept.
- BLM
- BOR
- Indian Res.
- Military
- Mixed/Other
- National Park/Mon.
- Private
- State & Regional Parks
- State Trust
- US Forest Service
- Wildlife Area/Refuge
- Township/Ranges

Project Size (acres): 40.47
Lat/Long (DD): 31.3351 / -109.5634
County(s): Cochise
AGFD Region(s): Tucson
Township/Range(s): T24S, R27E
USGS Quad(s): DOUGLAS

Arizona Game and Fish Department project_report_raul_castro_lpoe_proposed_c_82796_85215.pdf
Project ID: HGIS-23444 Review Date: 10/31/2024 01:24:49 PM

Special Status Species Documented within 3 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Agosia chrysogaster chrysogaster	Gila Longfin Dace Refugia	SC		S		
Cyprinella formosa	Beautiful Shiner	LT				1
Gila purpurea	Yaqui Chub Refugia	LE				1
Heloderma suspectum	Gila Monster					1
Hypsiglena sp. nov.	Hooded Nightsnake					2
Incilius alvarius	Sonoran Desert Toad					2
Kinosternon sonoriense sonoriense	Desert Mud Turtle			S		2
Leopardus pardalis	Ocelot Area of Potential Occurrence	LE				1
Panthera onca	Jaguar Area of Potential Occurrence	LE				1
Phrynosoma cornutum	Texas Horned Lizard	SC				
Poeciliopsis occidentalis sonoriensis	Yaqui Topminnow Refugia	LE				1
Rana blairi	Plains Leopard Frog			S		1
Rana chiricahuensis	Chiricahua Leopard Frog Refugia	LT				1
Strix occidentalis lucida	Mexican Spotted Owl	LT		S		1
Terrapene ornata luteola	Desert Box Turtle			S		1

Note: Status code definitions can be found at https://www.azgfd.com/wildlife-conservation/on-the-ground-conservation/state-wildlife-action-plan/state-wildlife-action-plan-status-definitions/.

No Special Areas Detected
No special areas were detected within the project vicinity.

Species of Greatest Conservation Need Predicted that Intersect with Project Footprint as Drawn, based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Ammodramus savannarum ammolegus	Arizona grasshopper sparrow		S	S		2
Ammodramus savannarum perpallidus	Western Grasshopper Sparrow					2
Anthus spragueii	Sprague's Pipit	SC				2
Aquila chrysaetos	Golden Eagle			S		2
Artemisiospiza nevadensis	Sagebrush Sparrow					3
Asio otus	Long-eared Owl					2
Aspidoscelis sonorae	Sonoran Spotted Whiptail					2
Athene cunicularia hypugaea	Western Burrowing Owl	SC	S	S		2
Auriparus flaviceps	Verdin					2
Buteo regalis	Ferruginous Hawk	SC		S		2
Buteo swainsoni	Swainson's Hawk					2
Buteogallus anthracinus	Common Black Hawk					2
Calcarius ornatus	Chestnut-collared Longspur					2
Callipepla squamata	Scaled Quail					2

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Arizona Game and Fish Department
Project ID: HGIS-23444

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Review Date: 10/31/2024 01:24:49 PM

Species of Greatest Conservation Need Predicted that Intersect with Project Footprint as Drawn, based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Calypte costae	Costa's Hummingbird					2
Campylorhynchus brunneicapillus	Cactus Wren					2
Catharus ustulatus	Swainson's Thrush					2
Chaetodipus baileyi	Bailey's Pocket Mouse					2
Chordeiles minor	Common Nighthawk					2
Coccyzus americanus	Yellow-billed Cuckoo (Western DPS)	LT	S	S		1
Columbina inca	Inca Dove					2
Corvus cryptoleucus	Chihuahuan Raven					2
Corynorhinus townsendii pallescens	Pale Townsend's Big-eared Bat	SC	S	S		1
Cynanthus latirostris	Broad-billed Hummingbird		S			2
Cynomys ludovicianus	Black-tailed Prairie Dog	CCA		S		1
Elgaria kingii	Madrean Alligator Lizard					2
Empidonax wrightii	Gray Flycatcher					2
Eumops perotis californicus	Greater Western Bonneted Bat	SC		S		2
Falco mexicanus	Prairie Falcon					2
Falco peregrinus anatum	American Peregrine Falcon	SC	S	S		1
Falco sparverius	American Kestrel					2
Haemorhous cassinii	Cassin's Finch					2
Heloderma suspectum	Gila Monster					1
Hypsiglena sp. nov.	Hooded Nightsnake					2
Icterus bullockii	Bullock's Oriole					2
Icterus cucullatus	Hooded Oriole					2
Incilius alvarius	Sonoran Desert Toad					2
Kinosternon flavescens	Yellow Mud Turtle					2
Lanius ludovicianus	Loggerhead Shrike	SC				2
Lasiurus cinereus	Hoary Bat					2
Lasiurus frantzii	Desert Red Bat		S			2
Lasiurus xanthinus	Western Yellow Bat		S			2
Leptonycteris yerbabuenae	Lesser Long-nosed Bat	SC		S		1
Lepus alleni	Antelope Jackrabbit					2
Megascops kennicottii	Western Screech-owl					2
Melanerpes uropygialis	Gila Woodpecker					2
Melospiza lincolnii	Lincoln's Sparrow					2
Micrathene whitneyi	Elf Owl					3
Myotis auriculus	Southwestern Myotis					2
Myotis velifer	Cave Myotis	SC		S		2
Myotis yumanensis	Yuma Myotis	SC				2
Notiosorex cockrumi	Cockrum's Desert Shrew					2
Nyctinomops femorosaccus	Pocketed Free-tailed Bat					2

Species of Greatest Conservation Need Predicted that Intersect with Project Footprint as Drawn, based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Nyctinomops macrotis	Big Free-tailed Bat	SC				2
Parabuteo unicinctus	Harris's Hawk					2
Passerculus sandwichensis	Savannah Sparrow					2
Peucaea botterii arizonae	Arizona Botteri's Sparrow			S		2
Peucaea carpalis	Rufous-winged Sparrow					2
Phrynosoma solare	Regal Horned Lizard					2
Pooecetes gramineus	Vesper Sparrow					2
Rana blairi	Plains Leopard Frog			S		1
Rana chiricahuensis	Chiricahua Leopard Frog	LT		S		1
Rana yavapaiensis	Lowland Leopard Frog	SC	S	S		1
Spizella breweri	Brewer's Sparrow					2
Tadarida brasiliensis	Brazilian Free-tailed Bat					2
Terrapene ornata	Ornate Box Turtle			S		1
Toxostoma bendirei	Bendire's Thrasher					2
Tyrannus crassirostris	Thick-billed Kingbird		S			2

Species of Economic and Recreation Importance Predicted that Intersect with Project Footprint as Drawn

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Callipepla gambelii	Gambel's Quail					
Callipepla squamata	Scaled Quail					
Patagioenas fasciata	Band-tailed Pigeon					
Pecari tajacu	Javelina					
Puma concolor	Mountain Lion					
Zenaida asiatica	White-winged Dove					
Zenaida macroura	Mourning Dove					

Project Type: Water Use, Transfer, and Channel Activities, Water diversion/channelization

Project Type Recommendations:
During the planning stages of your project, please consider the local or regional needs of wildlife in regards to movement, connectivity, and access to habitat needs. Loss of this permeability prevents wildlife from accessing resources, finding mates, reduces gene flow, prevents wildlife from re-colonizing areas where local extirpations may have occurred, and ultimately prevents wildlife from contributing to ecosystem functions, such as pollination, seed dispersal, control of prey numbers, and resistance to invasive species. In many cases, streams and washes provide natural movement corridors for wildlife and should be maintained in their natural state. Uplands also support a large diversity of species, and should be contained within important wildlife movement corridors. In addition, maintaining biodiversity and ecosystem functions can be facilitated through improving designs of structures, fences, roadways, and culverts to promote passage for a variety of wildlife. Guidelines for many of these can be found at: https://www.azgfd.com/wildlife-conservation/planning-for-wildlife/planning-for-wildlife-wildlife-friendly-guidelines/.

Minimize the potential introduction or spread of exotic invasive species, including aquatic and terrestrial plants, animals, insects and pathogens. Precautions should be taken to wash and/or decontaminate all equipment utilized in the project activities before entering and leaving the site. See the Arizona Department of Agriculture website for a list of prohibited and restricted noxious weeds at https://www.invasivespeciesinfo.gov/unitedstates/az.shtml and the Arizona Native Plant Society https://aznps.com/invas for recommendations on how to control. To view a list of documented invasive species or to report invasive species in or near your project area visit iMapInvasives - a national cloud-based application for tracking and managing invasive species at https://imap.natureserve.org/imap/services/page/map.html.

- To build a list: zoom to your area of interest, use the identify/measure tool to draw a polygon around your area of interest, and select "See What's Here" for a list of reported species. To export the list, you must have an account and be logged in. You can then use the export tool to draw a boundary and export the records in a csv file.

Minimization and mitigation of impacts to wildlife and fish species due to changes in water quality, quantity, chemistry, temperature, and alteration to flow regimes (timing, magnitude, duration, and frequency of floods) should be evaluated. Minimize impacts to springs, in-stream flow, and consider irrigation improvements to decrease water use. If dredging is a project component, consider timing of the project in order to minimize impacts to spawning fish and other aquatic species (include spawning seasons), and to reduce spread of exotic invasive species. We recommend early coordination with Project Evaluation Program for projects that could impact water resources, wetlands, streams, springs, and/or riparian habitats.

Consider incorporating project components that may allow for the inclusion to promote, enhance, create, or restore wildlife habitat. Contact Project Evaluation Program for further information and opportunities, PEP@azgfd.gov or (623) 236-7600 or https://www.azgfd.com/agency/offices/.

Project Location and/or Species Recommendations:
Your project site is within one or more defined **Areas of Possible Occurrence**. Please follow Department protocols while working within an Area of Potential Occurrence at U:\Agency Directives\Jaguar Ocelot and Mexican Wolf Management Directive 20171215.pdf

HDMS records indicate that one or more **Listed, Proposed, or Candidate** species or **Critical Habitat** (Designated or Proposed) have been documented in the vicinity of your project. The Endangered Species Act (ESA) gives the US Fish and Wildlife Service (USFWS) regulatory authority over all federally listed species. Please contact USFWS Ecological Services Offices at https://www.fws.gov/office/arizona-ecological-services or:

Phoenix Main Office
9828 North 31st Avenue #C3
Phoenix, AZ 85051-2517
Phone: 602-242-0210
Fax: 602-242-2513

Tucson Sub-Office
201 N. Bonita Suite 141
Tucson, AZ 85745
Phone: 520-670-6144
Fax: 520-670-6155

Flagstaff Sub-Office
SW Forest Science Complex
2500 S. Pine Knoll Dr.
Flagstaff, AZ 86001
Phone: 928-556-2157
Fax: 928-556-2121

A3: United States Environmental Protection Agency

REGION 9
SAN FRANCISCO, CA 94105

November 12, 2024

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: Scoping Comment for the Supplemental Environmental Impact Statement for the Raul Hector Castro Land Port of Entry, Cochise County, Arizona

Dear Mr. Kadri:

The U.S. Environmental Protection Agency has reviewed the General Services Administration's Notice of Intent to prepare the above-referenced document pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to EPA. It requires EPA to review and comment on the environmental impact on any proposed federal action subject to NEPA's environmental impact statement requirements and to make its comments public.

The lead agency signed the Record of Decision for the Final Environmental Impact Statement for the Raul Hector Castro Land Port of Entry expansion and modernization project on May 6th, 2024. The General Services Administration is preparing a Draft Supplemental Environmental Impact Statement to supplement the project to address and improve overall stormwater management and flood control needs, as well as improve port operation efficiency at the expanded and modernized Land Port of Entry. The Build Alternative will include acquiring land and right-of-way permissions for a stormwater channel of 2,500 feet of length between the Land Port and a desert wash west of Chino Road, and a 5-acre retention pond between the Land Port and Chino Road, north of the new channel.

We note that the City of Douglas Sewer Department includes a facility located at 100 North Chino Road near the international border, and that on April 17, 2024 (see attached) the Arizona Department of Environmental Quality terminated the Phase II MS4 City of Douglas Permit. As per Arizona's letter, they warn that any municipal stormwater discharge to Waters of the United States without an authorizing permit are a violation of the Clean Water Act and subject to enforcement under Arizona Revised Statutes, Title 40, Chapter 2, Article 4. We recommend the General Services Administration consult

with Arizona Department of Environmental Quality regarding all stormwater channeling and discharge design, and any state permit requirements.

We appreciate the General Services Administration's ongoing early coordination with the Environmental Protection Agency on the preparation of NEPA decisions for this project, and thank you for the opportunity to provide scoping comments for this SEIS. We would appreciate receiving notification when an electronic copy of the SEIS is available for review. If you have any questions, please contact me at (415) 972-3321, or appleton.zac@epa.gov.

Sincerely,

ZACHARIAH APPLETON

Digitally signed by ZACHARIAH APPLETON
Date: 2024.11.12 13:46:23 -08'00'

Zac Appleton
NEPA Reviewer
Environmental Review Section 2

ENCLOSURE:
1. Electronic Copy of ADEQ's April 17, 2024 Phase II MS4 Termination letter to the City of Douglas

cc: Lesley Davidson
Permit Writer and Coordinator, Arizona Department of Environmental Quality

2

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

Katie Hobbs
Governor

Karen Peters
Cabinet Executive Officer
Executive Deputy Director

Notice of Termination

April 17, 2024

Ms. Elise Moore, Public Health Director/City of Douglas Engineer
425 E. 10th Street
Douglas, AZ 85607

Re: **Termination of Phase II MS4 City of Douglas Permit due to WOTUS Changes**
LTF# 92395

Dear Ms. Moore,

On November 1, 2023, the Arizona Department of Environmental Quality (ADEQ) received the City of Douglas Phase II Municipal Separate Storm Sewer System (MS4) Notice of Termination. After a comprehensive evaluation of the Notice of Termination, JE Fuller's assessment, titled "ADEQ MS4 - Waters of the United States Evaluation" (attached), and a thorough desktop review, ADEQ finds that the City of Douglas (City) does not discharge pollutants to a Water of the U.S. (WOTUS) protected surface water as defined by the "Revised Waters of the United States (WOTUS): Conforming" rule.

Furthermore, the City of Douglas has never met the automatic nationwide designation criteria, defined as a small MS4 with a population of 50,000 people or more within census blocks as determined by the latest Decennial Census. The City was originally mandated to file a Notice of Intent (NOI) in 2002 under residual designation authority (RDA) (40 CFR 123.35(b)(1)(i)) due to endangered species habitat and insufficient protection of water quality concerns along the United States-Mexico Border. The former concern is not explained in the original 2002 agency letter beyond a cursory reference to a generic concern about critical habitat. The latter is not a factor considered in ADEQ's RDA criteria in Arizona Administrative Code (AAC) R18-9-A902(D)(1), adopted pursuant to 40 CFR 123.35(b). Upon receipt of the Notice of Termination, ADEQ reassessed the RDA used to regulate the MS4 and found there is no critical habitat in or adjoining the City's jurisdiction and the City's stormwater discharge is unlikely to affect water quality standards or contribute pollutants to waters of the United States. Thus, it has been determined that the City does not meet the criteria necessary to require a Phase II MS4 permit.

The two above reasons are independently sufficient for termination. Consequently, ADEQ terminates the Phase II MS4 general permit (AZG2021-002), previously issued to the City under LTF# 92395. The termination shall be effective thirty (30) days of receipt of this notice unless an objection is filed within that timeframe.[i] Should you disagree with this determination, you are entitled to appeal this final agency action in accordance with §41-1092.03.

Phoenix Office
1110 W. Washington St. | Phoenix, AZ 85007
602-771-2300

Southern Regional Office
400 W. Congress St. | Suite 433 | Tucson, AZ 85701
520-628-6733

azdeq.gov

Please be advised of the following:

1. If there are specific outstanding matters or concerns related to the termination, please contact ADEQ's Surface Water Protection Permits Unit at AZPDES@azdeq.gov to discuss them further.
2. If in the future there are significant changes to the definition of WOTUS, the City may be required to submit a new NOI to be covered under future Phase II MS4 permits

Consequences of Stormwater Discharges without an MS4 Permit

Please be aware that any municipal stormwater discharges to Water of the U.S. without permit coverage under an authorizing permit are a violation of the Clean Water Act and are subject to enforcement action according to Arizona Revised Statues, Title 49, Chapter 2, Article 4, including injunctive relief up to $25,000 per day, per violation as well as criminal penalties.

Thank you for your efforts to comply with Arizona's environmental requirements. Should you have any comments or questions regarding this matter, please contact Lesley Davidson at (520) 628 - 5018 or davidson.lesley@azdeq.gov.

Respectfully,

DocuSigned by:
Josephine Maressa
A5AF6048FAC8426...
Josephine Maressa, Deputy Director
Water Quality Division
Arizona Department of Environmental Quality

---

[i] This determination is an appealable agency action under A.R.S. § 41-1092. You have the right to request a hearing and file an appeal under A.R.S. § 41-1092.03. To do this you must file a Request for Hearing or Notice of Appeal within thirty (30) days of receipt of this notice. A request for Hearing or Notice of Appeal is filed when it is received by ADEQ's Hearing Administrator as follow:

Hearing Administrator
Office of Administrative Counsel
Arizona Department of Environmental Quality
1110 West Washington Street
Phoenix, AZ 85007

The Request or Notice must contain the following:

1. The name of the party that is filing the appeal;
2. The address of the party that is filing the appeal;
3. The action being appealed; and
4. A concise statement of the reasons for the appeal.

Upon proper filing of a Request for Hearing or Notice of Appeal, ADEQ will serve a Notice of Hearing on all parties to the appeal. If you file a timely Request for Hearing or Notice of Appeal, you have the right to request an informal settlement conference with ADEQ under A.R.S § 41-1092.06. This request must be made in writing no later than 20 days before a scheduled hearing and must be filed with the Hearing Administrator at the above address.

JE FULLER
hydrology • geomorphology

October 17, 2023

H. Elise Moore, PE,
Public Works Director/City Engineer
City of Douglas
425 E 10th Street
Douglas, AZ 85607

RE: ADEQ MS4 – Waters of the United States Evaluation
City of Douglas Arizona

Dear Ms. Moore,

Per our discussion today JE Fuller has reviewed the summary minutes provided by Leslie Davidson of ADEQ on October 13, 2023. The review centered around the conclusion that Whitewater Draw is **most likely** a Waters of the United States (WOTUS) based on the fact that it crosses the United States-Mexico international border. From this determination, ADEQ stated that the City of Douglas **should** continue to comply with Arizona Pollutant Discharge Elimination General Permit for Stormwater Discharges from Small Municipal Separate Sewer Systems to Protected Surface Waters (General Permit AZG2021-002), though the permit area could be reduced to only the area contributing to the Whitewater Draw Basin.

The "Revised Definition of 'Waters of the United States' " became effective on March 20, 2023. Modifications to that rule were necessary to conform key aspects of the regulatory text to the U.S. Supreme Court's May 25, 2023 decision in the case of Sackett v. Environmental Protection Agency. The conforming rule, "Revised Definition of 'Waters of the United States'; Conforming," was published in the Federal Register and became effective on September 8, 2023, as described on the EPA's website (https://www.epa.gov/wotus/about-waters-united-states). According to 40 CFR 120.2 and 33 CFR 328.3 (eCFR :: 40 CFR Part 120 -- Definition of Waters of the United States and eCFR :: 33 CFR 328.3 -- Definitions), the term "Waters of the United States" means:

(1) Waters which are:
(i) Currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
(ii) The territorial seas; or
(iii) Interstate waters;
(2) Impoundments of waters otherwise defined as waters of the United States under this definition, other than impoundments of waters identified under paragraph (a)(5) of this section;
(3) Tributaries of waters identified in paragraph (a)(1) or (2) of this section that are relatively permanent, standing or continuously flowing bodies of water;
(4) Wetlands adjacent to the following waters:
(i) Waters identified in paragraph (a)(1) of this section; or
(ii) Relatively permanent, standing or continuously flowing bodies of water identified in paragraph (a)(2) or (a)(3) of this section and with a continuous surface connection to those waters;
(5) Intrastate lakes and ponds, streams, or wetlands not identified in paragraphs (a)(1) through (4) of this section that are relatively permanent, standing or continuously flowing bodies of water with a continuous surface connection to the waters identified in paragraph (a)(1) or (a)(3) of this section.

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JE Fuller examined the information provided by ADEQ regarding the current status of the watercourses in question and compared it to the current effective "conforming" definition of a WOTUS. JE Fuller agrees with ADEQ's statement that Whitewater Draw is most likely a WOTUS because it crosses the international United States-Mexico border and is an "interstate water" as listed in the WOTUS definition provided on the previous page in Paragraph (1)(iii).

That said, in comparing the location of Whitewater Draw to the jurisdiction limits of the City of Douglas and the potential outfalls along the western edge of the City, there are no outfalls that directly discharge into Whitewater Draw. The outfalls actually discharge into Apple White Wash, which is a tributary of and discharges into Whitewater Draw inside the unincorporated limits of Cochise County (i.e., part of Cochise County's MS4 not the City of Douglas' MS4).

Although the City does not directly discharge into Apple White Wash, but rather into the Cochise County jurisdiction, it is necessary to examine Apple White Wash as a potential WOTUS. To be considered a WOTUS, the watercourse must meet one of the criteria specified in the current effective "conforming" definition of a WOTUS provided on the previous page. Specifically, Apple White Wash would need to meet the criteria outlined in Paragraph (3) of the current WOTUS definition because it is a tributary and does not meet any of the criteria listed in Paragraphs (1), (2), (4), or (5). For tributaries of WOTUS to be considered WOTUS themselves, they must be "relatively permanent, standing or continuously flowing bodies of water."

Although JE Fuller did not conduct a full analysis of the flow status (relative permanence) or surface connectivity of Apple White Wash to Whitewater Draw, a review of Apple White Wash found that this watercourse lacks nearly all the qualities that could make it "relatively permanent" (i.e., riparian vegetation, aquatic organisms, surface water, etc.), and during normal conditions, the watercourse does not contain standing or continuously flowing water. Thus, it would not likely qualify as a WOTUS under the current effective definition of a WOTUS.

Given the above, it is JE Fuller's opinion that the City of Douglas does not discharge into a WOTUS under the most recently formalized definition ("Revised Definition of 'Waters of the United States'; Conforming,"; effective September 8, 2023) and could be relieved of the requirements associated with complying with ADEQ's General Permit AZG2021-002.

Sincerely,
JE Fuller/Hydrology & Geomorphology, Inc.

Christopher Rod

Christopher Rod, P.E.,
Vice President

P1: Michael Gomez

GSA

General Services Administration

Raul Hector Castro Land Port of Entry, Douglas, Arizona
Supplemental Environmental Impact Statement
PUBLIC SCOPING MEETING

COMMENT FORM

Please print clearly. Add extra pages if necessary.

My comment is about (check all that apply):

- [ ] Air Quality/Greenhouse Gases
- [ ] Environmental Justice
- [ ] Soils
- [ ] Utilities and Infrastructure
- [ ] Visual Resources and Aesthetics
- [ ] Biological Resources
- [ ] Geologic Resources
- [x] Land Use
- [x] Socioeconomics
- [x] Water Resources
- [ ] Cultural Resources
- [x] Hazardous Waste and Materials
- [ ] Noise
- [ ] Transportation and Traffic
- [ ] Human Health & Safety
- [ ] Other: ________

Get Smart !!

Name: Dr Michael Gomez
Organization, No - Retired Title:
Address: 2300 E 12th
Email:

3 Ways to Submit Comments:

Public Scoping Meeting
(*Fill out comment form and submit at scoping meeting.*)

E-mail
osmahn.kadri@gsa.gov
(*Include "Douglas Scoping Comment" in the subject line*)

U.S. Mail
Attention: Osmahn Kadri, NEPA Project Manager
General Services Administration
c/o Potomac-Hudson Engineering, Inc.
77 Upper Rock Circle, Suite 302
Rockville, MD 20850

Comments must be received by November 11, 2024

P2: Sandra Heater

---------- Forwarded message ---------
From: **Sandra Heater** [redacted]
Date: Mon, Oct 28, 2024 at 3:34 PM
Subject: Re:
To: Osmahn Kadri - 9PTC <osmahn.kadri@gsa.gov>

Goodness. I will try to resend.

Sandra

On Mon, Oct 28, 2024 at 3:23 PM Osmahn Kadri - 9PTC <osmahn.kadri@gsa.gov> wrote:
Hi Sandra,

This is the only email I am seeing from you. Please reply with the map and tax code information. Thanks and have a great day!

Thank you,

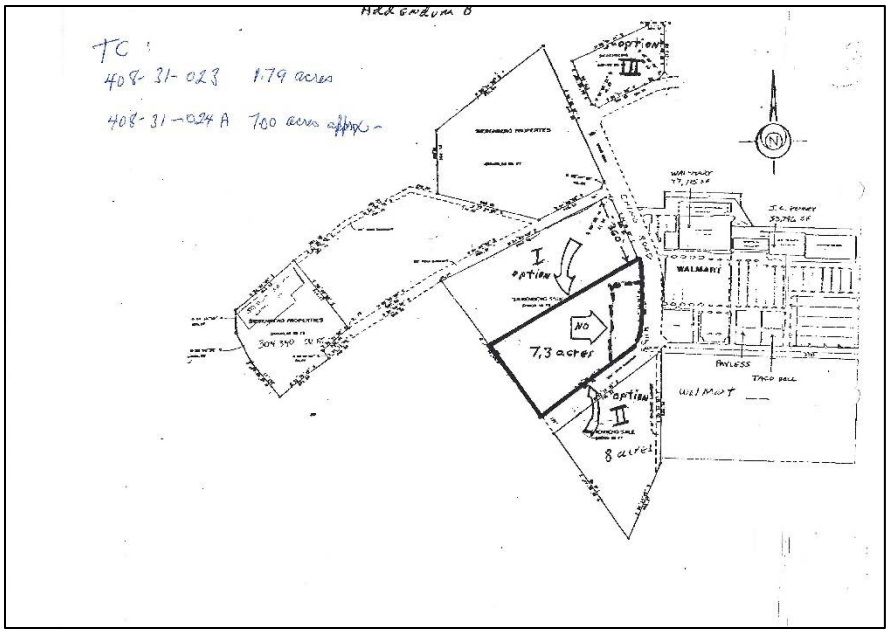
Osmahn Kadri
NEPA Program Manager, Region 9
General Services Administration
415-760-9239
Osmahn.Kadri@gsa.gov

1

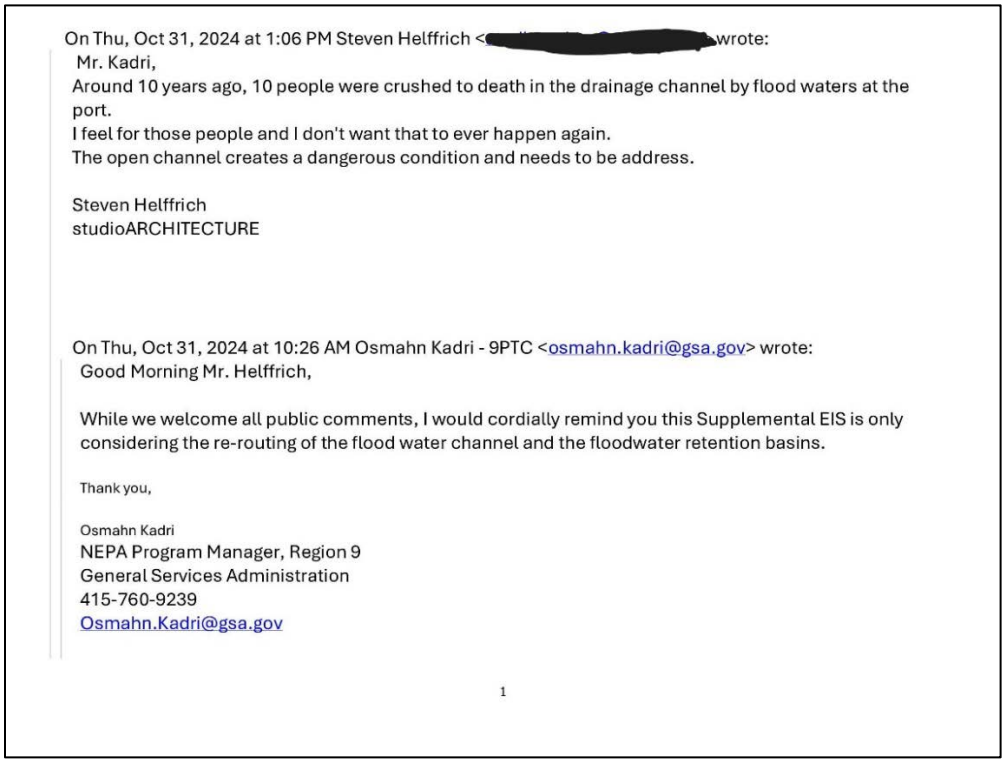
On Wed, Oct 23, 2024 at 2:48 PM Sandra Heater <[redacted]> wrote:
Just checking to be sure the map and tax code information transmitted properly.

Thank you.

Sandra Heater



P3: Steven Helffrich



On Thu, Oct 31, 2024 at 1:06 PM Steven Helffrich <[redacted] wrote:

Mr. Kadri,
Around 10 years ago, 10 people were crushed to death in the drainage channel by flood waters at the port.
I feel for those people and I don't want that to ever happen again.
The open channel creates a dangerous condition and needs to be address.

Steven Helffrich
studioARCHITECTURE

On Thu, Oct 31, 2024 at 10:26 AM Osmahn Kadri - 9PTC <osmahn.kadri@gsa.gov> wrote:

Good Morning Mr. Helffrich,

While we welcome all public comments, I would cordially remind you this Supplemental EIS is only considering the re-routing of the flood water channel and the floodwater retention basins.

Thank you,

Osmahn Kadri
NEPA Program Manager, Region 9
General Services Administration
415-760-9239
Osmahn.Kadri@gsa.gov

1

On Thu, Oct 31, 2024 at 8:26 AM Steven Helffrich [redacted] wrote:
Good morning Mr. Kadri,

Yes, I will be submitting written comments.
Before I do that can you answer this question?

Programming wise, can the pedestrian functions be seperated (physically) from the vehicle functions?

My comments will be based on the answer.
Thank you for all your hard work.

Steven Helffrich
studioARCHITECTURE

On Wed, Oct 30, 2024 at 1:47 PM Osmahn Kadri - 9PTC <osmahn.kadri@gsa.gov> wrote:
Hey Steven,

Nice to see you last week, and understandable. I will enter these into the administrative record. Do you have a specific comment though?

Thank you,

Osmahn Kadri
NEPA Program Manager, Region 9
General Services Administration
415-760-9239
Osmahn.Kadri@gsa.gov

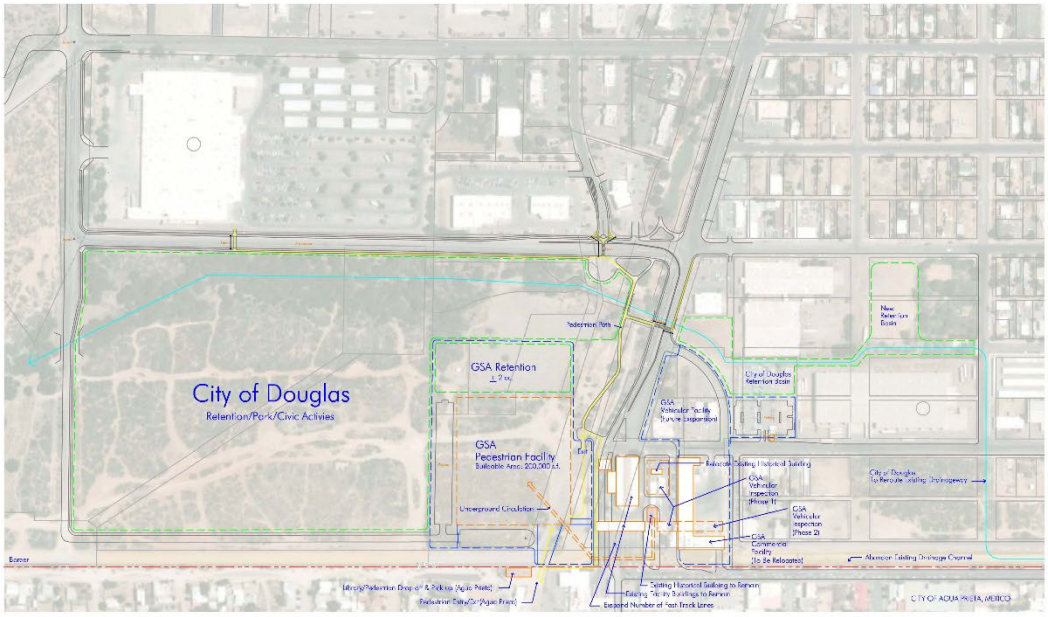
---------- Forwarded message ---------
From: **Steven Helffrich** <[redacted]
Date: Wed, Oct 30, 2024 at 10:27 AM
Subject: Raul Castro LPOE
To: Osmahn Kadri - 9PTC <osmahn.kadri@gsa.gov>

Mr, Kadri,
Nice to see you briefly at the meeting last week.
Those meetings make me uncomfortable: too many politicos.

See attached
For your use.

Steven Helffrich
studioARCHITECTURE

2



SITE PLAN
N.T.S.

Raul Hector Castro
Land Port of Entry
Douglas, Arizona

SITE PLAN
N.T.S.

Retention Basin Project
Dolores Ave & 1st St.
City of Douglas
Douglas, Arizona

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ATTACHMENT J: INDEX OF COMMENTS BY SOURCE AND DATE

Commenter ID	Total Comments	Date	Name	Affiliation (if any)	Comment Method
Agency					
A1	7	11/1/2024	Julie McIntyre	U.S. Fish and Wildlife Service (FWS)	Email / Letter
A2	4	11/4/2024	Raul Vega	Arizona Game & Fish Department	Email / Letter
A3	1	11/12/2024	Zacharia Appleton, Environmental Review Branch	U.S. Environmental Protection Agency (EPA)	Email / Letter
Public					
P1	1	10/24/2024	Michael Gomez		Scoping Meeting
P2	1	10/28/2024	Sandra Heater		Email
P3	1	10/30/2024	Steven Helffrich	studioARCHITECTURE	Email

APPENDIX B – CONSULTATION AND COORDINATION

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TABLE OF CONTENTS

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B.1 UNITED STATES FISH AND WILDLIFE SERVICE

B.1.1 GSA's Follow-up Informal Consultation Letter (Section 7 of ESA) – January 8, 2025

GSA Pacific Rim Region

January 8, 2025

Ms. Julie McIntrye
U.S. Fish and Wildlife Service
Arizona Ecological Services Office
Flagstaff, AZ 86005

RE: Continuation of Consultation, #2023-0035776-S7-001, Supplemental Environmental Impact Statement for the 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) is preparing a Draft Supplemental Environmental Impact Statement (SEIS) for the Expansion and Modernization of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) and Proposed Commercial LPOE in Douglas, Arizona.

The purpose of this letter is to request U.S. Fish and Wildlife Service (USFWS) concurrence with GSA's updated determination that the RHC LPOE expansion and modernization project may affect, but would not likely adversely affect, protected species pursuant to Section 7 of the Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 et seq.). This letter describes updates to GSA's proposed project, provides figures of the potential areas of impact (Enclosure 1); and proposed measures to avoid, minimize, or offset the effects from the project.

Background and Past USFWS Consultations

In April 2024, GSA completed a *Final Environmental Impact Statement for the Expansion and Modernization of the Raul Hector Castro Land Port of Entry and Proposed Commercial Land Port of Entry in Douglas, Arizona* (herein referred to as the 2024 Final Environmental Impact Statement [EIS]). GSA signed a Record of Decision (ROD) for the 2024 Final EIS on May 14, 2024. In the ROD, GSA selected Alternative 2 (Concurrent Construction – Westward Expansion), herein referred to as the 2024 Final EIS preferred alternative, which would involve construction of a new Commercial LPOE and phased expansion and modernization of the existing RHC LPOE at the same time, with expansion primarily to the west of the existing RHC LPOE. The 2024 Final EIS and GSA's signed ROD can be viewed on the GSA project website at: https://www.gsa.gov/about-us/gsa-regions/region-9-pacific-rim/land-ports-of-entry/raul-hector-castro-land-port-of-entry/environmental-review.

As part of development of the 2024 Final EIS, GSA completed informal consultation with the USFWS. GSA sent a technical assistance letter to the USFWS Arizona Ecological Services Field Office dated November 22, 2022 to assist in the effect determination to federally protected species under Section 7 of the ESA. USFWS provided a response letter on December 16, 2022 and a letter regarding a review of the Draft EIS on February 8, 2023. In

1

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San Francisco, CA 94102
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their February 8, 2023 response letter, USFWS provided comments on GSA's effect determinations under Section 7 of the ESA; GSA provided responses to USFWS's comments in the 2023 Draft EIS. GSA submitted a letter to USFWS dated September 8, 2023 regarding the availability of the revised Draft EIS and requesting concurrence on their updated effect determination. In response, USFWS provided a letter on September 26, 2023 requesting further information on the project. As a result, GSA and USFWS discussed the project during a meeting on November 6, 2023, and GSA submitted a follow-up letter to USFWS on November 13, 2023. Additionally, GSA notified USFWS on February 7, 2023 on the expanded footprint at the Commercial LPOE. USFWS sent a concurrence letter dated February 28, 2024. This communication can be viewed in the 2024 Final EIS, Appendix B.

During design of the RHC LPOE expansion and modernization project, GSA determined that the existing Rose Avenue channel alignment, which runs through the 2024 Final EIS preferred alternative project area, could create complications for construction and operation of the expanded and modernized RHC LPOE as a result of increased flood risk and additional engineering and construction costs. To address these issues, GSA is proposing to realign a segment of the Rose Avenue channel and extend and improve the existing concrete box culvert (CBC). In addition, GSA determined that additional stormwater capacity was needed at the expanded and modernized RHC LPOE. To address this issue, GSA is proposing construction of a new stormwater basin to the west of the RHC LPOE to accommodate stormwater flow from the proposed RHC LPOE expansion and modernization project. The project also involves acquiring additional land or obtaining appropriate land use agreements, as well as obtaining necessary permissions to implement these changes. As a result of these proposed changes to the 2024 Final EIS preferred alternative, GSA has determined that supplemental NEPA analysis is required.

Proposed Action

GSA is preparing a Draft SEIS for the purpose of analyzing potential environmental impacts from realignment of the Rose Avenue channel and construction of a new stormwater basin. As part of the decision-making process in the SEIS, GSA is evaluating one action alternative and the no action alternative.

Under Alternative 1, GSA proposes to realign a segment of the Rose Avenue channel and construct a new stormwater basin west of the 2024 Final EIS preferred alternative project area (see Enclosure 1). The proposed layout provided in Enclosure 1 represents a preliminary concept site plan for development and is used as a basis for discussion and environmental analysis. The Proposed Action would support and interconnect with design elements from the 2024 Final EIS preferred alternative.

Alternative 1 would consist of the following:

- Construct an approximately 2,500-foot-long stormwater channel that is anticipated to be either an open concrete-lined or riprap-lined open channel along the entire route. The proposed stormwater channel would originate at an extended CBC located beneath the existing personally owned vehicle lanes south of the RHC LPOE inspection area and generally travel west, north of Border Road, and terminate at the unnamed wash west of Chino Road. Water flowing out of this proposed channel would proceed south along the unnamed wash across the U.S. – Mexico border as it does under existing conditions. The proposed alignment of the channel would avoid, as much as possible, existing utility components such as utility poles, sewer manholes (MHs), utility vault, the Border Road, and sewer mains.

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- Evaluate and improve the existing CBC beneath the LPOE. A portion of the existing CBC may be maintained in place.
- Extend the existing CBC to the west and terminate it immediately west of the existing repatriation drop off location at the southern end of the expanded and modernized LPOE. Demolition of existing structures would be limited to only a portion of the existing CBC that needs to be removed.
- Demolish the existing stormwater channel that parallels the western side of Pan American Avenue between East 3rd Street and the southern end of the existing RHC LPOE. The upstream end of the existing channel would then be transitioned to the surrounding adjacent grade, and rock riprap would be placed on the exposed surface. Alternatively, the existing stormwater channel segment may be reused as conduit or other purposes during the expansion and modernization of the RHC LPOE.
- Install a new CBC where the proposed stormwater channel crosses Chino Road. This would also include repairing the portions of Chino Road that are impacted by improving the CBC in that area, and may require lowering of an existing water line at Chino Road.
- As necessary, construct a maintenance road on either the north or south side of the proposed stormwater channel for maintenance access. This could also include a crossing or bridge over the proposed stormwater channel, as well as installation of guard rails as needed.
- Potentially construct security fencing on the north side of the proposed stormwater channel.
- Construct a 5-acre stormwater basin between the RHC LPOE and Chino Road and north of the proposed stormwater channel. The stormwater basin would be designed for temporary water storage with a 36-hour drain time, in compliance with City regulations, rather than a retention basin for permanent water storage.
- Obtain all necessary land and right-of-way permissions for the stormwater channel segment and stormwater basin. This could include acquiring, obtaining easements, or obtaining similar land use agreements on portions of land totaling approximately 22.7 acres currently owned by the City of Douglas and a private landowner. This may also include a new right-of-way grant from the Bureau of Land Management if any portions of Border Road are required for construction.

Stormwater would still flow through the segment of the unnamed wash from the existing discharge point and proposed new discharge point of the Rose Avenue channel as shown in Enclosure 1 from properties located to the north, northeast, and east; however, the amount of stormwater flowing through the wash in this segment would be reduced due to the amount of stormwater being diverted from the realigned Rose Avenue channel. GSA is in the process of conducting hydrology studies to investigate overall changes in flow through the existing and proposed stormwater channels as well as into the unnamed wash, and will provide available updates in the Final SEIS.

In addition to the proposed activities related to the above stormwater management facilities, an existing sanitary sewer line located within the project area would need to be extended and realigned to avoid conflicts with the realigned Rose Avenue channel segment. This would include construction of a new MH and establishing a new connection to an existing MH at an 18-inch reinforced concrete pipe sanitary sewer line east of Chino Road. This sanitary sewer line collects wastewater from the RHC LPOE and properties east of the port. In the long term, the entire existing sanitary sewer line within the project area may be abandoned or removed

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as part of the RHC LPOE expansion and modernization project, and sanitary sewer utilities for the expanded and modernized RHC LPOE and properties to the east may be tied into an existing sanitary sewer line north of the existing port along Pan American Avenue.

The timeframe for agency coordination and construction is tentative and is subject to change. However, for the purposes of analysis, design and agency coordination for Alternative 1 is anticipated to take approximately 1 year to complete, and construction is anticipated to take approximately 6 months in total to complete. Construction of the stormwater basin is expected to occur during the construction of the RHC LPOE expansion and modernization project as considered in the 2024 Final EIS. Construction of the realigned Rose Avenue channel segment is expected to occur prior to construction of the RHC LPOE expansion and modernization project as considered in the 2024 Final EIS. During construction of the realigned Rose Avenue channel segment, it is estimated there could be approximately 20 worker vehicles, 20 delivery vehicles for construction supplies, and 10 haul trucks per day to the project area for deliveries and waste removal. All construction and demolition waste would be disposed of and recycled at authorized facilities. GSA would implement appropriate traffic control measures and install signage on local roadways during construction to manage construction vehicle traffic.

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

Special Status Species

GSA generated an Information for Planning and Consultation (IPaC) report for the Proposed Action (**Enclosure 2; Project Code No. 2025-0037102**). The IPaC report identified threatened, endangered, and candidate species that may occur within the region of influence (ROI). The ROI for the 2024 Final EIS was defined in Section 3.7.1.1 of that EIS as the vegetation, wildlife, special status species, and migratory birds within 1,000 feet of the current RHC LPOE, proposed expansion areas, and proposed Commercial LPOE. As shown in Enclosure 1, the 2024 Final EIS ROI contains a portion of the Proposed Action including the area of the proposed demolition of the existing stormwater channel that parallels the western side of Pan American Avenue between East 3rd Street and the southern end of the existing RHC LPOE, and a portion of the area proposed for realignment of the Rose Avenue channel. The Proposed Action's ROI includes these portions of the 2024 Final EIS ROI as well as three parcels of land to the west as shown in Enclosure 1, totaling 22.7 acres. The ROI for this project also includes vegetation, wildlife, special status species, and migratory birds within 1,000 feet of these areas.

The species list generated by the database search includes a total of seven federally threatened or endangered species: one mammal, one bird, one amphibian, three fish, and one plant species. USFWS has designated critical habitat for six of these species; however, no critical habitat for any of these listed species occurs within or near the ROI.

In addition, the Arizona Game and Fish Department (AZGFD) provided a scoping comment on November 4, 2024 (see Enclosure 3) that included a database query of the Arizona Environmental Online Review Tool identifying species of greatest conservation need with potential to occur within 3 miles of the project area. This tool identified three federally protected species (one mammal, one bird, and one fish) in addition to those identified in the USFWS IPaC.

GSA has considered the likelihood of each special status species to occur within the ROI for the Proposed Action based on existing site conditions and the species' range, distribution,

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and habitat requirements. As additional species have been identified per AZGFD's comments with a potential to occur within the ROI, GSA has also considered the likelihood of these special status species to occur within the ROI for the larger RHC LPOE expansion and modernization project that were not considered in GSA's prior informal consultation with USFWS. GSA has made updated effect determinations for all special status species with potential to occur within the ROI for the Proposed Action considered in the SEIS as well as the implementation of the overall RHC LPOE expansion and modernization project (see Table 1). The IPaC for the 2024 Final EIS is also included in Enclosure 2.

Migratory Birds and Bald and Golden Eagles

Per the IPaC results, two species of migratory birds of conservation concern are expected to occur within the ROI (broad-tailed hummingbird [*Selasphorus platycercus*] and phainopepla [*Phainopepla nitens lepida*]). In addition, based on a review of an Arizona Environmental Online Review Tool query provided by the AZGFD attached to a November 4, 2024 scoping letter (see Enclosure 3), 46 migratory bird species with protection under the Migratory Bird Treaty Act (MBTA), as well as the golden eagle which is protected under the Bald and Golden Eagle Protection Act (BGEPA), were identified with potential to occur in the project area. As noted in the AZGFD scoping letter, breeding season for birds (including raptors) in the vicinity of the project is generally January through the end of June.

A species with particular potential to occur within the project area as noted by AZGFD is the western burrowing owl. This species is known to occupy a range of habitats, including open, treeless areas within grassland, steppe, and desert biomes, as well as vacant undeveloped lots. Western burrowing owls generally nest in existing burrows, such as those dug by prairie dogs or other fossorial species, or human-made structures such as culverts and pipes.

Scoping Comments

GSA is also in receipt of the USFWS Arizona Ecological Services Office scoping comments dated November 1, 2024 (see Enclosure 4). GSA appreciates your office's input and has considered these comments in preparation of the Draft SEIS as summarized below in Table 2.

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

Species	Federal Status	Habitat	Impact Rating	Potential Impacts Summary
Jaguar (*Panthera onca*)	Endangered	Ranges from tropical forests, lowland scrub and woodland, thorn scrub, desert, swampy savanna, mangrove swamps and marshland. In the desert southwest, includes rugged mountainous terrain. Feeds on large and small mammals, reptiles, and ground nesting birds.	May affect, not likely to adversely affect	Jaguars can occupy a variety of habitats, including the mountains of the desert southwest in the U.S., and are known to pass through areas close to the U.S. – Mexico border on rare occasions. The border fence between the U.S. and Mexico impedes movement of this species, although openings in the border wall, including seasonal openings such as flood gates, can act as funnels for movements. A flood gate is located just east of the project area, although in close proximity to the developed areas of Agua Prieta. Jaguars are much more likely to be found in secluded areas with cover away from human activity, particularly in mountainous areas. The proximity of the ROI to the City of Douglas and Agua Prieta to the south and associated development, presence of regular human activity (e.g., Border Patrol), and lack of suitable cover zone for traveling jaguars make it highly unlikely to encounter a jaguar within the ROI. Jaguars have not been documented within close proximity to the City of Douglas. A review of the Jaguar Observation Database identified no observations of jaguars within 30 miles of the ROI. The nearest sightings have been in the Chiricahua Mountains to the north. As noted in USFWS concurrence letter for the RHC LPOE expansion and modernization project dated February 28, 2024, it is unlikely jaguars would occur near the existing RHC LPOE or proposed expansion areas as considered in the 2024 Final EIS. Therefore, construction or operation of the Proposed Action would not reduce the overall amount of available suitable habitat. When considered with the implementation of the 2024 Final EIS preferred alternative, overall effects to this species project do not change.
Ocelot (*Leopardus pardalis*)	Endangered	Ranges from savanna, shrubland, chaparral, woodland, and riverine scrub. In the desert southwest, includes rugged mountainous terrain. Dens are typically in caves, hollow trees, or thickets.	May affect, not likely to adversely affect	While the ROI exists within this species' range, ocelots are more likely to be found in secluded areas with cover away from human activity, particularly in mountainous areas. The ROI is generally disturbed and consists of low-quality habitat. In addition, the proximity of the ROI to the City of Douglas and Agua Prieta to the south, associated development, and presence of regular human activity (e.g., CBP) make it highly unlikely to encounter an ocelot within the ROI. Effects to this species were not considered for the RHC LPOE expansion and modernization project as it was not identified in the USFWS IPaC as having potential to occur within the ROI as defined

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

Species	Federal Status	Habitat	Impact Rating	Potential Impacts Summary
				in the 2024 Final EIS. This species has been included for consideration based on results of an Arizona Environmental Online Review Tool Report query. The ROI for the 2024 Final EIS preferred alternative includes an additional 106 acres and 16.6 acres of Madrean Archipelago desert scrub/semi-desert grassland; however, there is a still a very low probability that ocelots would be encountered in these areas due to the proximity to human development, presence of human activity, lack of suitable cover zone for traveling species, and distance from mountainous areas. Noise levels from construction would be temporary and attenuate such that levels would be consistent with ambient levels beyond 0.5 mile of the project area. The overall project would remove a relatively small amount of low-quality habitat relative to the range of this species. As such, construction and operation would not likely reduce the overall amount of available suitable habitat. Further, GSA would implement measures to avoid, minimize, or offset effects from construction activities. When considered with the implementation of the 2024 Final EIS preferred alternative, the Proposed Action may affect, but would not likely adversely affect this species.
Mexican spotted owl (*Strix occidentalis lucida*)	Threatened	Most commonly found in mixed conifer, pine-oak, and evergreen oak forest. Also occur in ponderosa pine forest and rocky canyonlands.	No effect	While the ROI exists within this species' range, it does not support the species' preferred forest habitat. Effects to this species were not considered for the RHC LPOE expansion and modernization project as it was not identified in the USFWS IPaC as having potential to occur within the ROI as defined in the 2024 Final EIS. This species has been included for consideration based on results of an Arizona Environmental Online Review Tool Report query. The ROI for the 2024 Final EIS preferred alternative is similar to that for the Proposed Action considered in the SEIS and lacks the species' preferred forest habitat. As such, construction and operation would not likely reduce the overall amount of available suitable habitat. Further, GSA would implement measures to avoid, minimize, or offset effects from construction activities. When considered with the implementation of the 2024 Final EIS preferred alternative, no effects to this species are anticipated.

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

Species	Federal Status	Habitat	Impact Rating	Potential Impacts Summary
Yellow-billed cuckoo (*Coccyzus americanus*)	Threatened	Migratory species; Arizona within breeding range. Nests in deciduous woodlands, moist tickets, orchards, and overgrown pastures.	May affect, not likely to adversely affect	This species is generally associated with riparian habitats and builds nests in trees along rivers in the western U.S. There is an unnamed wash located within the ROI, but it is dry most of the year. However, this species is migratory, and it is possible that individuals may pass through the ROI, stopping to rest or forage. As noted in USFWS concurrence letter for the RHC LPOE expansion and modernization project dated February 28, 2024, it is unlikely resident cuckoos would occupy the project footprint near the existing RHC LPOE or proposed expansion areas as considered in the 2024 Final EIS. Therefore, due to lack of suitable nesting habitat, this species is not expected to reside within the ROI. As such, construction and operation of the Proposed Action would not reduce the overall availability of nesting habitat or high-quality foraging habitat. To minimize or avoid potential for direct impacts, GSA would implement avoidance and minimization measures to conduct any tree removal outside of the nesting season (i.e., January through June). When considered with the implementation of the 2024 Final EIS preferred alternative, overall effects to this species project do not change.
Chiricahua leopard frog (*Rana chiricahuensis*)	Threatened	Springs, pools, lakes, reservoirs, streams, and rivers.	No effect	There is no suitable habitat within the ROI. Per informal consultation with the USFWS dated December 16, 2022 (see Appendix B of the 2024 Final EIS), the most proximate known location for this species is located 7 miles from the proposed Commercial LPOE site, which is approximately 5 miles west of the project area. This species does not generally disperse over these distances. Further, the potential connecting habitats are occupied by bullfrogs and not useable as dispersal mechanisms for the Chiricahua leopard frog. A copy of USFWS correspondence with these findings is included in Appendix B of the 2024 Final EIS. When considered with the implementation of the 2024 Final EIS preferred alternative, no effects to this species are anticipated.
Gila Topminnow (incl. Yaqui) (*Poeciliopsis occidentalis*)	Endangered	Small to medium rivers with medium to slow currents over gravel/sand substrates.	No effect	There is no suitable habitat within the ROI. The ROI contains an unnamed wash that is dry most of the year. Effects to this species were not considered for the RHC LPOE expansion and modernization project as it was not identified in the USFWS IPaC as having potential to occur within the ROI as defined in the 2024 Final EIS. This species has been included for

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

Species	Federal Status	Habitat	Impact Rating	Potential Impacts Summary
				consideration based on results of an Arizona Environmental Online Review Tool Report query. The ROI for the 2024 Final EIS preferred alternative is similar to that for the Proposed Action considered in the SEIS and only contains unnamed washes that are dry most of the year. As such, construction and operation would not likely reduce the overall amount of available suitable habitat. When considered with the implementation of the 2024 Final EIS preferred alternative, no effects to this species are anticipated.
Beautiful Shiner (*Cyprinella formosa*)	Threatened	Small to medium streams and ponds.	No effect	There is no suitable habitat within the ROI. The ROI contains an unnamed wash that is dry most of the year. Effects to this species were not considered for the RHC LPOE expansion and modernization project as it was not identified in the USFWS IPaC as having potential to occur within the ROI as defined in the 2024 Final EIS. This species has been included for consideration based on results of an Arizona Environmental Online Review Tool Report query. The ROI for the 2024 Final EIS preferred alternative is similar to that for the Proposed Action considered in the SEIS and only contains unnamed washes that are dry most of the year. As such, construction and operation would not likely reduce the overall amount of available suitable habitat. When considered with the implementation of the 2024 Final EIS preferred alternative, no effects to this species are anticipated.
Yaqui catfish (*Ictalurus pricei*)	Threatened	Small to medium rivers with medium to slow currents over gravel/sand substrates.	No effect	There is no suitable habitat within the ROI. The ROI contains an unnamed wash that is dry most of the year. When considered with the implementation of the 2024 Final EIS preferred alternative, no effects to this species are anticipated.
Yaqui chub (*Gila purpurea*)	Endangered	Deep pools in creeks, springheads, and other stream-associated quiet waters.	No effect	There is no suitable habitat within the ROI. The ROI contains an unnamed wash that is dry most of the year. When considered with the implementation of the 2024 Final EIS preferred alternative, no effects to this species are anticipated.
Arizona Eryngo *(Eryngium sparganophyllum)*	Endangered	Perennially moist, organic soils found in spring-fed aridland ciénegas, or wetlands supported by adequate groundwater.	No effect	There is no suitable habitat within the ROI. The ROI does not contain any ciénega wetlands, which this species requires. Effects to this species were not considered for the RHC LPOE expansion and modernization project as it was not identified in the USFWS IPaC as having potential to occur within the ROI as defined

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

Species	Federal Status	Habitat	Impact Rating	Potential Impacts Summary
				in the 2024 Final EIS. This species has been included for consideration based on results of an Arizona Environmental Online Review Tool Report query. The ROI for the 2024 Final EIS preferred alternative is similar to that for the Proposed Action considered in the SEIS and does not contain ciénega wetlands, which this species requires. As such, construction and operation would not likely reduce the overall amount of available suitable habitat. When considered with the implementation of the 2024 Final EIS preferred alternative, no effects to this species are anticipated.

CBP = Customs and Border Protection; EIS = Environmental Impact Statement; GSA = General Services Administration; IPaC = Information for Planning and Consultation; LPOE = Land Port of Entry; RHC = Raul Hector Castro; ROI = Region of Influence; SEIS = Supplemental Environmental Impact Statement; U.S. = United States; USFWS = United States Fish and Wildlife Service

Note: IPaC identified one other additional species within the ROI: northern Aplomado falcon (*Falco femoralis septentrionalis*; experimental or non-essential). However, this species does 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 SEIS.

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Table 2. USFWS Scoping Comments on the SEIS

Comment	Response
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 from project implementation. Specifically, we encourage you to consider the following: Construction Noise: Project implementation is likely to increase the ambient noise levels from construction activities and equipment. Several species that could occur within the action area are sensitive to anthropogenic disturbance and could experience adverse effects. Habitat Alteration: Project implementation is likely to alter specific components of habitat through vegetation removal, dust creation, and altered hydrology, as ground and soil disturbance. These components may alter foraging, nesting, roosting, or prey availability for federally listed species.	Construction activities would require ground disturbance, grading, and clearing of approximately 10 acres in the project area. Digging and other ground disturbance may present opportunities for wildlife to become trapped within excavated areas, particularly when these areas are not immediately backfilled. The introduction of cars, trucks, and heavy machinery could also result in the mortality of a limited number of less-mobile species. In addition, construction activities would remove existing vegetation and therefore result in the alteration of the existing ecological community, as well as contribute to minor habitat fragmentation from permanent habitat removal. This may cause minor alteration of foraging, nesting, roosting, or prey availability in the area, including for western burrowing owl and other migratory bird species protected under the MBTA, as well as golden eagles protected under the BGEPA. The land proposed for realigning the Rose Avenue channel and constructing the new stormwater basin is primarily undeveloped, although it does not represent high-quality native habitat for most local species as it is previously disturbed from historical use and ongoing activities (i.e., Customs and Border Protection patrols). The site also contains existing utilities, roadways and dirt paths, as well as construction debris piles and other discarded waste, and is directly adjacent to other developed sites (i.e., commercial sites to the north, City of Douglas Wastewater Treatment Plant and slag piles to the east). Therefore, many species that inhabit areas near the project area are expected to be tolerant of humans and vehicle traffic or would be expected to relocate to nearby areas of suitable habitat, minimizing the potential for direct adverse impacts. GSA would implement impact reduction measures as described below to minimize or avoid impacts to nesting migratory bird species, golden eagles, and wildlife around open trenches and excavated sites within the project area. Following construction, the stormwater basin and other areas temporarily disturbed would be revegetated and maintained as necessary. Construction would introduce temporarily higher levels of human activity in the project area and adjacent areas. As noted in Section 3.7.2.4 of the 2024 Final EIS, temporary increases in noise levels generated during construction may be up to 54 to 59 A-weighted decibels at 1,000 feet away from the limits of disturbance. The resulting noise, in addition to human presence and dust, during construction activities could deter use or cause displacement of local wildlife, including migratory birds, from the surrounding area. As noted above, construction would occur in undeveloped, previously disturbed areas that do not represent high-quality native habitat for most local species; therefore, most species that inhabit areas near the project area are expected to be tolerant of humans and vehicle traffic or are able to relocate to nearby areas of suitable habitat.
Sedimentation and Water Diversion: Water is a critical component in shaping habitats in arid environments. The quantify and timing of water often determines the floral and faunal communities of an area. Altering flow and increasing sedimentation could adversely affect local ecosystem processes upon which listed species rely.	Operations would result in altered hydrology and diversion of water flows in the segment of the unnamed wash north of the project area between the existing and proposed discharge location (see Enclosure 1). Diversion of flow would reduce some, although not all, of the periodic flow into this segment of the unnamed wash. Flow would continue to periodically discharge into the wash segment from stormwater channels from the north and east following rain events. Habitat in this segment of the unnamed wash could be slightly degraded due to decreases in stormwater flows, although is expected to be largely comparable to existing conditions considering that some surface flows would remain. GSA is in the process of conducting hydrology studies to investigate

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Table 2. USFWS Scoping Comments on the SEIS

Comment	Response
	overall changes in flow through the existing and proposed stormwater channels as well as into the unnamed wash, and will provide available updates in the Final SEIS. It is possible diversion of water could improve habitat as the existing channel is known to be experiencing capacity issues resulting in overland flooding in this area, and heavy erosion and scour have been observed along the channel banks. As noted above, the project area is located near undeveloped but previously disturbed areas that do not represent high-quality native habitat for local species. Further, this riparian habitat area is not known to provide specific habitat for any federally or state protected species (see Table 1 in Enclosure 4). The overall volume of water entering the segment of the unnamed wash downstream of the proposed discharge point for the realigned Rose Avenue channel would be comparable to current conditions. Therefore, no effects are expected to habitat or species utilizing the unnamed wash downstream of the proposed discharge point for the realigned Rose Avenue channel.
In addition, we urge you coordinate project planning with potentially interested tribes that may have cultural affiliations in the area of project implementation, as tribal consultation is vital to the preservation of tribal culture.	GSA is seeking tribal input to help inform the analysis of the project. GSA previously solicited tribal input as part of the RHC LPOE expansion and modernization project as described in Section 1.3.5 of the 2024 Final EIS. Federally recognized tribes were sent letters on October 11, 2024 continuing government-to-government consultation requesting input on this project.
Lastly, also recommend you seek additional information and coordinate your project with the Arizona Game and Fish Department. 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 (https://www.azgfd.com/wildlife/planning/projevalprogram/).	We are in receipt of comments from the AZGFD on the project (see Enclosure 3) and have incorporated them into our analysis as detailed herein. AZGFD was included on the distribution list for the 2024 Final EIS and is included on the current distribution list for this SEIS. GSA will continue to coordinate with AZGFD throughout the NEPA process.

AZGFD = Arizona Game and Fish Department; BGEPA = Bald and Golden Eagle Protection; EIS = Environmental Impact Statement; GSA = General Services Administration; LPOE = Land Port of Entry; MBTA = Migratory Bird Treaty Act; NEPA = National Environmental Policy Act; RHC = Raul Hector Castro; ROI = Region of Influence; SEIS = Supplemental Environmental Impact Statement

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Proposed Measures to Avoid, Minimize, or Offset the Effects of the Proposed Action

The following impact reduction measures and best management practices would be followed during implementation of the Proposed Action:

- Limit the transport of invasive species by washing construction equipment before and after coming to the project site to the extent practicable;
- Reduce effects of fugitive dust from project activities by using watering trucks and installing wind fencing where appropriate during windy conditions;
- Implement measures to reduce soil erosion, soil loss, and sedimentation associated with project activities (e.g., disturbed areas would be restored or revegetated to extent possible following construction);
- Ensure that revegetation activities would utilize native, weed-free seed mix (i.e., plant species would not be invasive or noxious) and disturbed areas are restored or revegetated to the extent practicable following construction;
- Ensure that construction activities occur during daylight hours, to the highest extent practicable;
- Make efforts to ensure that vehicles associated with project implementation adhere to posted speed limits;
- An occupancy survey would be conducted to determine if any western burrowing owls are present within the project area in accordance with the *Burrowing Owl Project Clearance Guidance for Landowners* guidance. The survey would be conducted by a surveyor who is certified by AZGFD or has similar training and qualifications. If an active burrowing owl burrow is detected, GSA would contact AZGFD and USFWS for further direction.
- To the extent practicable, vegetation clearing or trimming would be avoided in the project area during the migratory bird nesting season (generally between January and June). If clearing or trimming is required during the nesting season, surveys would be conducted by a qualified biologist to determine if any nesting birds occur in the project area prior to removal or trimming of vegetation. If nesting birds are present, removal or trimming of the vegetation would be delayed until after nesting season, or GSA would coordinate with the USFWS for additional technical assistance in complying with the MBTA.
- To the extent practicable, the amount of time any open trench or large hole is left open would be minimized. When trenches or large holes cannot be backfilled immediately, escape ramps (e.g., short lateral trenches or wooden planks sloping to the surface) would be installed in each hole and at least every 295 feet (90 meters) in a trench. Slopes would be less than 45 degrees and trenches and holes that have been left open would be inspected to remove any wildlife prior to backfilling.
- Pre-construction presence/absence surveys for any bald or golden eagles would be completed to determine if there is a need to remove potentially suitable habitat within the project area. Surveys would be conducted pursuant to local USFWS field office requirements. The need for any restrictions around tree clearing, if any, would be determined in coordination with applicable federal resource agencies pending survey results. If the project is determined to have potential to disturb or kill bald or golden eagles, GSA would obtain a permit under the BGEPA.

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Concurrence Request

GSA has determined that the Proposed Action, in conjunction with the implementation of the larger RHC LPOE expansion and modernization project, may affect, but is not likely to adversely affect, protected species pursuant to Section 7 of the ESA. GSA would greatly appreciate your concurrence with GSA's determination within 30 days to enable us to complete this phase of the project within the scheduled timeframe. GSA also welcomes any information on the species potentially present in the project area that would further inform the effect determinations contained herein, as well as any input on proposed impact reduction measures that could be incorporated into the Proposed Action to avoid adverse effects to these species.

Should you have any immediate questions, concerns, or comments, please contact to Osmahn Kadri at (415) 522-3617 or 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,

X Osmahn Kadri

Osmahn Kadri
NEPA Program Manager

Enclosure 1 – Figures of the Project Area
Enclosure 2 – IPaC Reports (2025 SEIS IPaC and 2024 Final EIS IPaC)
Enclosure 3 – AZGFD Scoping Comment
Enclosure 4 – Federally Threatened and Endangered Species with Potential to Occur within the ROI and Effect Determinations

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Enclosure 1 – Figures of Project Area

Figure 1. Regional Location of the RHC LPOE and Project Area

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Enclosure 1 – Figures of Project Area

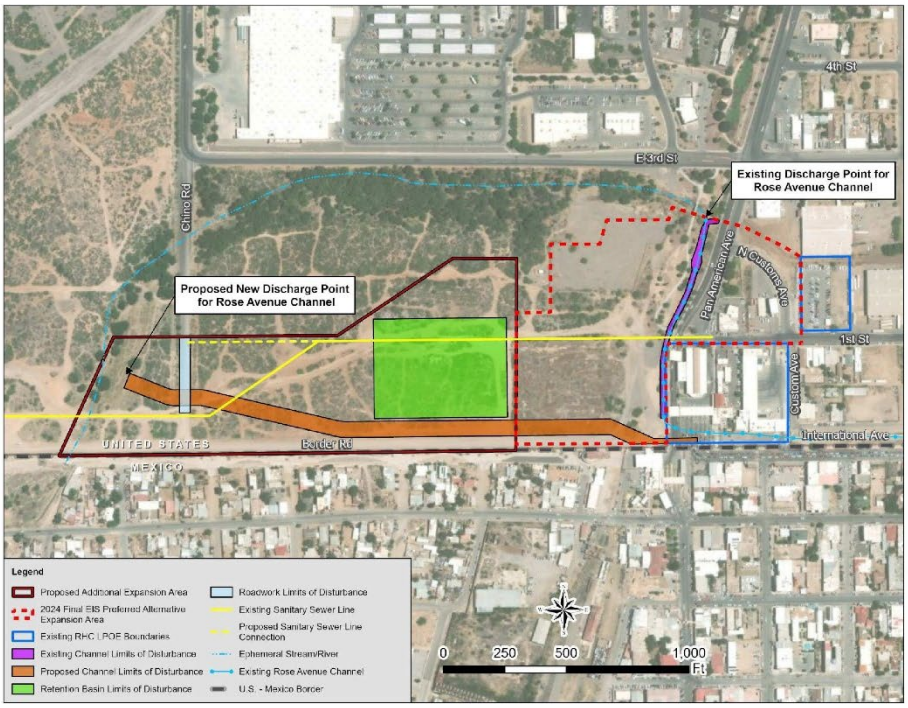

Figure 2. Site Location for the Project Area

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Enclosure 2 – IPaC Reports

2025 SEIS IPaC

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Arizona Ecological Services Field Office
9828 North 31st Ave
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Phoenix, AZ 85051-2517
Phone: (602) 242-0210 Fax: (602) 242-2513

In Reply Refer To: 01/02/2025 17:02:28 UTC
Project Code: 2025-0037102
Project Name: RHC LPOE Rose Avenue Channel, South Alignment with New Stormwater Basin

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The Fish and Wildlife Service (Service) is providing this list under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*). The list you have generated identifies threatened, endangered, proposed, and candidate species, and designated and proposed critical habitat, that *may* occur within the One-Range that has been delineated for the species (candidate, proposed, or listed) and it's critical habitat (designated or proposed) with which your project polygon intersects. These range delineations are based on biological metrics, and do not necessarily represent exactly where the species is located. Please refer to the species information found on ECOS to determine if suitable habitat for the species on your list occurs in your project area.

The purpose of the Act is to provide a means whereby threatened and endangered species and the habitats upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of Federal trust resources and to determine whether projects may affect federally listed species and/or designated critical habitat. A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.
If the Federal action agency determines that listed species or critical habitat *may be affected* by a federally funded, permitted or authorized activity, the agency must consult with us pursuant to 50 CFR 402. Note that a "may affect" determination includes effects that may not be adverse and that may be beneficial, insignificant, or discountable. An effect exists even if only one individual

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Enclosure 2 – IPaC Reports

or habitat segment may be affected. The effects analysis should include the entire action area, which often extends well outside the project boundary or "footprint." For example, projects that involve streams and river systems should consider downstream affects. If the Federal action agency determines that the action may jeopardize a *proposed* species or may adversely modify *proposed* critical habitat, the agency must enter into a section 7 conference. The agency may choose to confer with us on an action that may affect proposed species or critical habitat.

Candidate species are those for which there is sufficient information to support a proposal for listing. Although candidate species have no legal protection under the Act, we recommend that they be considered in the planning process in the event they become proposed or listed prior to project completion. More information on the regulations (50 CFR 402) and procedures for section 7 consultation, including the role of permit or license applicants, can be found in our Endangered Species Consultation Handbook at: https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf.

We also advise you to 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 MBTA prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when authorized by the Service. The Eagle Act prohibits anyone, without a permit, from taking (including disturbing) eagles, and their parts, nests, or eggs. Currently 1,026 species of birds are protected by the MBTA, including the western burrowing owl (*Athene cunicularia hypugaea*). Protected western burrowing owls can be found in urban areas and may use their nest/burrows year-round; destruction of the burrow may result in the unpermitted take of the owl or their eggs.

If a bald eagle or golden eagle nest occurs in or near the proposed project area, our office should be contacted for Technical Assistance. An evaluation must be performed to determine whether the project is likely to disturb or harm eagles. The National Bald Eagle Management Guidelines provide recommendations to minimize potential project impacts to bald eagles (see https://www.fws.gov/law/bald-and-golden-eagle-protection-act and https://www.fws.gov/program/eagle-management).

The Division of Migratory Birds (505/248-7882) administers and issues permits under the MBTA and Eagle Act, while our office can provide guidance and Technical Assistance. For more information regarding the MBTA, BGEPA, and permitting processes, please visit the following web site: https://www.fws.gov/program/migratory-bird-permit. Guidance for minimizing impacts to migratory birds for communication tower projects (e.g. cellular, digital television, radio, and emergency broadcast) can be found at https://www.fws.gov/media/recommended-best-practices-communication-tower-design-siting-construction-operation.

The U.S. Army Corps of Engineers (Corps) may regulate activities that involve streams (including some intermittent streams) and/or wetlands. We recommend that you contact the Corps to determine their interest in proposed projects in these areas. For activities within a National Wildlife Refuge, we recommend that you contact refuge staff for specific information about refuge resources, please visit this link or visit https://www.fws.gov/program/national-

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wildlife-refuge-system to locate the refuge you would be working in or around.

If your action is on tribal land or has implications for off-reservation tribal interests, we encourage you to contact the tribe(s) and the Bureau of Indian Affairs (BIA) to discuss potential tribal concerns, and to invite any affected tribe and the BIA to participate in the section 7 consultation. In keeping with our tribal trust responsibility, we will notify tribes that may be affected by proposed actions when section 7 consultation is initiated. For more information, please contact our Tribal Coordinator, John Nystedt, at 928/556-2160 or John_Nystedt@fws.gov.

We also recommend you seek additional information and coordinate your project with the Arizona Game and Fish Department. Information on known species detections, special status species, and Arizona species of greatest conservation need, such as the western burrowing owl and the Sonoran desert tortoise (*Gopherus morafkai*) can be found by using their Online Environmental Review Tool, administered through the Heritage Data Management System and Project Evaluation Program (https://www.azgfd.com/wildlife-conservation/planning-for-wildlife/project-evaluation-program/).

We appreciate your concern for threatened and endangered species. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office. If we may be of further assistance, please contact our Flagstaff office at 928/556-2118 for projects in northern Arizona, our general Phoenix number 602/242-0210 for central Arizona, or 520/670-6144 for projects in southern Arizona.

Sincerely,
/s/

Heather Whitlaw
Field Supervisor
Attachment

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

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OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Arizona Ecological Services Field Office
9828 North 31st Ave
#c3
Phoenix, AZ 85051-2517
(602) 242-0210

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PROJECT SUMMARY

Project Code: 2025-0037102
Project Name: RHC LPOE Rose Avenue Channel, South Alignment with New Stormwater Basin
Project Type: Drainage Project
Project Description: The Raul Hector Castro (RHC) Land Port of Entry (LPOE) is located on approximately 6 acres with facilities owned and managed by U.S. General Services Administration (GSA) and operated by U.S Customs and Border Protection (CBP) in Douglas, Arizona. The project area is located west of the existing RHC LPOE and Pan American Avenue, south of East 3rd Street, north of Border Road and the U.S. – Mexico border, and just west of Chino Road.

During design of the RHC LPOE expansion and modernization project, GSA determined that the existing Rose Avenue channel alignment could create complications for construction and operation of the expanded and modernized RHC LPOE. To address these issues, GSA is proposing a project that includes realigning a segment of the Rose Avenue channel (sometimes also referred to as the Rose Avenue Canal or International Canal) and extending and improving the existing concrete box culvert (CBC). In addition, GSA determined that additional stormwater capacity was needed at the expanded and modernized RHC LPOE. To address this issue, GSA is proposing construction of a new stormwater basin to the west of the RHC LPOE to accommodate stormwater flow from the proposed RHC LPOE expansion and modernization project. The project may also include the acquisition of additional land or obtaining appropriate land use agreements, as well as obtaining necessary permissions to implement these changes.

Project Location:
The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@31.3356316,-109.56466508019878,14z

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Counties: Cochise County, Arizona

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ENDANGERED SPECIES ACT SPECIES

There is a total of 8 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

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MAMMALS

NAME	STATUS
Jaguar *Panthera onca* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3944	Endangered

BIRDS

NAME	STATUS
Northern Aplomado Falcon *Falco femoralis septentrionalis* Population: U.S.A (AZ, NM) No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1923	Experimental Population, Non-Essential
Yellow-billed Cuckoo *Coccyzus americanus* Population: Western U.S. DPS There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3911	Threatened

AMPHIBIANS

NAME	STATUS
Chiricahua Leopard Frog *Rana chiricahuensis* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/1516	Threatened

FISHES

NAME	STATUS
Gila Topminnow (incl. Yaqui) *Poeciliopsis occidentalis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1116	Endangered
Yaqui Catfish *Ictalurus pricei* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5432	Threatened
Yaqui Chub *Gila purpurea* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3414	Endangered

FLOWERING PLANTS

NAME	STATUS
Arizona Eryngo *Eryngium sparganophyllum* Population: There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/10705	Endangered

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CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

BALD & GOLDEN EAGLES

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act[1] and the Migratory Bird Treaty Act[2].

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats[3], should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles".

1. The Bald and Golden Eagle Protection Act of 1940.
2. The Migratory Birds Treaty Act of 1918.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

THERE ARE NO BALD AND GOLDEN EAGLES WITHIN THE VICINITY OF YOUR PROJECT AREA.

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats[3] should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles".

1. The Migratory Birds Treaty Act of 1918.

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2. The Bald and Golden Eagle Protection Act of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Broad-tailed Hummingbird *Selasphorus platycercus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/11935	Breeds May 25 to Aug 21
Phainopepla *Phainopepla nitens lepida* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/11973	Breeds Mar 1 to Aug 20

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)
Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

■ probability of presence ■ breeding season | survey effort – no data

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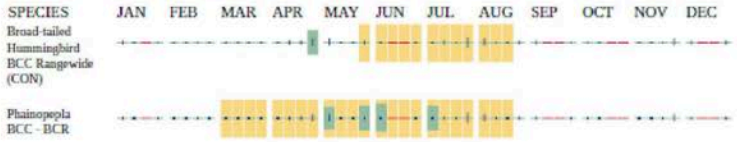

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

WETLANDS

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

RIVERINE

- R4SBC

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IPAC USER CONTACT INFORMATION

Agency: General Services Administration
Name: Sean McCain
Address: 77 Upper Rock Circle, Suite 302
City: Rockville
State: MD
Zip: 20850
Email sean.mccain@phe.com
Phone: 2533663412

You have indicated that your project falls under or receives funding through the following special project authorities:

- BIPARTISAN INFRASTRUCTURE LAW (BIL) (OTHER)

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IPaC **U.S. Fish & Wildlife Service**

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Cochise County, Arizona

Local office

Arizona Ecological Services Field Office

(602) 242-0210
(602) 242-2513

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San Francisco, CA 94102
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9828 North 31st Ave
#c3
Phoenix, AZ 85051-2517

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Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information. IPaC only shows species that are regulated by USFWS (see FAQ).

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2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME	STATUS
Jaguar Panthera onca Wherever found There is **final** critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/3944	Endangered

Birds

NAME	STATUS
Northern Aplomado Falcon Falco femoralis septentrionalis No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/1923	EXPN
Yellow-billed Cuckoo Coccyzus americanus There is **final** critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/3911	Threatened

Reptiles

NAME	STATUS
Northern Mexican Gartersnake Thamnophis eques megalops Wherever found There is **final** critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/7655	Threatened

Amphibians

NAME	STATUS

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Chiricahua Leopard Frog Rana chiricahuensis Wherever found There is **final** critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/1516	Threatened

Fishes

NAME	STATUS
Yaqui Catfish Ictalurus pricei Wherever found There is **final** critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/5432	Threatened
Yaqui Chub Gila purpurea Wherever found There is **final** critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/3414	Endangered

Flowering Plants

NAME	STATUS
Wright's Marsh Thistle Cirsium wrightii There is **proposed** critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/8963	Proposed Threatened

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

There are no critical habitats at this location.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

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Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern https://www.fws.gov/program/migratory-birds/species
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf

There are no migratory birds of conservation concern expected to occur at this location.

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the Rapid Avian Information Locator (RAIL) Tool.

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What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets.

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the RAIL Tool and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Eagle Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the Diving Bird Study and the nanotag studies or contact

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Caleb Spiegel or Pam Loring.

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Coastal Barrier Resources System

Projects within the John H. Chafee Coastal Barrier Resources System (CBRS) may be subject to the restrictions on federal expenditures and financial assistance and the consultation requirements of the Coastal Barrier Resources Act (CBRA) (16 U.S.C. 3501 et seq.). For more information, please contact the local Ecological Services Field Office or visit the CBRA Consultations website. The CBRA website provides tools such as a flow chart to help determine whether consultation is required and a template to facilitate the consultation process.

There are no known coastal barriers at this location.

Data limitations

The CBRS boundaries used in IPaC are representations of the controlling boundaries, which are depicted on the official CBRS maps. The boundaries depicted in this layer are not to be considered authoritative for in/out determinations close to a CBRS boundary (i.e., within the "CBRS Buffer Zone" that appears as a

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hatched area on either side of the boundary). For projects that are very close to a CBRS boundary but do not clearly intersect a unit, you may contact the Service for an official determination by following the instructions here: https://www.fws.gov/service/coastal-barrier-resources-system-property-documentation

Data exclusions

CBRS units extend seaward out to either the 20- or 30-foot bathymetric contour (depending on the location of the unit). The true seaward extent of the units is not shown in the CBRS data, therefore projects in the offshore areas of units (e.g., dredging, breakwaters, offshore wind energy or oil and gas projects) may be subject to CBRA even if they do not intersect the CBRS data. For additional information, please contact CBRA@fws.gov.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

There are no refuge lands at this location.

Fish hatcheries

There are no fish hatcheries at this location.

Wetlands in the National Wetlands Inventory

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Wetland information is not available at this time

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This can happen when the National Wetlands Inventory (NWI) map service is unavailable, or for very large projects that intersect many wetland areas. Try again, or visit the NWI map to view wetlands at this location.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

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IPaC **U.S. Fish & Wildlife Service**

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Cochise County, Arizona

Local office

Arizona Ecological Services Field Office

(602) 242-0210
(602) 242-2513

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50 United Nations Plaza
San Francisco, CA 94102
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9828 North 31st Ave
#c3
Phoenix, AZ 85051-2517

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Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information. IPaC only shows species that are regulated by USFWS (see FAQ).

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2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME	STATUS
Jaguar Panthera onca Wherever found There is **final** critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/3944	Endangered

Birds

NAME	STATUS
Northern Aplomado Falcon Falco femoralis septentrionalis No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/1923	EXPN
Yellow-billed Cuckoo Coccyzus americanus There is **final** critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/3911	Threatened

Reptiles

NAME	STATUS
Northern Mexican Gartersnake Thamnophis eques megalops Wherever found There is **final** critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/7655	Threatened

Amphibians

NAME	STATUS

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Chiricahua Leopard Frog Rana chiricahuensis Wherever found There is **final** critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/1516	Threatened

Fishes

NAME	STATUS
Yaqui Catfish Ictalurus pricei Wherever found There is **final** critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/5432	Threatened
Yaqui Chub Gila purpurea Wherever found There is **final** critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/3414	Endangered

Flowering Plants

NAME	STATUS
Wright's Marsh Thistle Cirsium wrightii There is **proposed** critical habitat for this species. The location of the critical habitat is not available. https://ecos.fws.gov/ecp/species/8963	Proposed Threatened

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

There are no critical habitats at this location.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

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Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern https://www.fws.gov/program/migratory-birds/species
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf

There are no migratory birds of conservation concern expected to occur at this location.

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the Rapid Avian Information Locator (RAIL) Tool.

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What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets.

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the RAIL Tool and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Eagle Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the Diving Bird Study and the nanotag studies or contact

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Caleb Spiegel or Pam Loring.

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Coastal Barrier Resources System

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There are no known coastal barriers at this location.

Data limitations

The CBRS boundaries used in IPaC are representations of the controlling boundaries, which are depicted on the official CBRS maps. The boundaries depicted in this layer are not to be considered authoritative for in/out determinations close to a CBRS boundary (i.e., within the "CBRS Buffer Zone" that appears as a

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hatched area on either side of the boundary). For projects that are very close to a CBRS boundary but do not clearly intersect a unit, you may contact the Service for an official determination by following the instructions here: https://www.fws.gov/service/coastal-barrier-resources-system-property-documentation

Data exclusions

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Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

There are no refuge lands at this location.

Fish hatcheries

There are no fish hatcheries at this location.

Wetlands in the National Wetlands Inventory

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Wetland information is not available at this time

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This can happen when the National Wetlands Inventory (NWI) map service is unavailable, or for very large projects that intersect many wetland areas. Try again, or visit the NWI map to view wetlands at this location.

Data limitations

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Data precautions

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Enclosure 3 – AZGFD Scoping Comment on the SEIS

November 04, 2024

Mr. Osmahn Kadri
U.S. General Services Administration
c/o Potomac-Hudson Engineering, Inc.
77 Upper Rock Circle, Suite 302
Rockville, MD 20850

Electronically submitted to: osmahn.kadri@gsa.gov

RE: Supplemental Environmental Impact Statement (SEIS) for the Expansion and Modernization of the Raul Hector Castro Land Port of Entry and Proposed Commercial Land Port of Entry Scoping

Dear Mr Kadri:

The Arizona Game and Fish Department (Department) appreciates the invitation to review and comment on the Scoping for the Supplemental Environmental Impact Statement (SEIS) for the Raul Hector Castro Land Port of Entry and Proposed Commercial Land Port of Entry. The Department understands the purpose of the United States (U.S.) General Services Administration (GSA) proposed action is to analyze the potential impacts resulting from a proposed flood channel realignment and expansion of the retention basin to the west of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) in Douglas, Arizona. The Proposed Action aims to address and improve overall stormwater management and flood control needs, as well as improve port operation efficiency at the expanded and modernized RHC LPOE. The Proposed Action is needed to avoid engineering conflicts between the current alignment of the Rose Avenue Channel with the current proposed layout for the expanded and modernized RHC LPOE; to divert stormwater away from and reduce flooding risks at the RHC LPOE; to provide sufficient stormwater retention capacity for the expanded and modernized RHC LPOE; and to enhance overall functionality and safety.

The Department further understands the existing Rose Avenue Channel runs through the Alternative 2 Expansion Area and could create complications for construction and operation of the expanded and modernized RHC LPOE. To address these issues, GSA is proposing a project that includes realigning and reconstructing the Rose Avenue Channel, extending and improving the existing concrete box culvert, and constructing a new retention basin to the west of the RHC LPOE. The project also involves acquiring additional land and obtaining necessary permissions to implement these changes. The purpose and need for the overall RHC LPOE expansion and modernization project as considered in the May 2024 Record of Decision remains the same.

Enclosure 3 – AZGFD Scoping Comment on the SEIS

Habitat in the project area consists of desert scrub and semi-desert grasslands, with large well-spaced scrub shrubs intermixed with short grasses.

Under Title 17 of the Arizona Revised Statutes, the Department, by and through the Arizona Game and Fish Commission, has jurisdictional authority and public trust responsibilities to conserve and protect the state fish and wildlife resources. In addition, the Department manages threatened and endangered species through authorities of Section 6 of the Endangered Species Act and the Department's Section 10(a)(1)(A) permit. It is the mission of the Department to conserve and protect Arizona's diverse fish and wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations. For your consideration, the Department provides the following comments based on the agency's statutory authorities, public trust responsibilities, and special expertise related to wildlife resources and recreation.

The Department understands the importance and need for increased capacity of CBP's infrastructure at the U.S.-Mexico border and provides the following recommendations to aid in the conservation and protection of Arizona's diverse biological resources:

- A report was created for the proposed supplemental action site by the Arizona Online Environmental Review Tool (ERT) on October 31, 2024. The ERT report (see attached HGIS-23444) indicates that western burrowing owl, a special status species that is regulated under the Migratory Bird Treaty Act (MBTA), could occur within the project footprint. If suitable habitat for this species is present within or adjacent to the project area, the Department recommends conducting an occupancy survey to determine if this species occurs within the project footprint. Guidelines for conducting this survey are found in *Burrowing Owl Project Clearance Guidance for Landowners*[1]. Please note that the survey should be conducted by a surveyor who is certified by the Department or has similar training and qualifications. If an active burrowing owl burrow is detected, please contact the Department and the U.S. Fish and Wildlife Service[2] (USFWS) for direction, in accordance with the Guidelines.

- Vegetation within the project area may provide nesting opportunities for avian species regulated under the MBTA and protected under state law. Breeding season for birds (including raptors) in the project vicinity is generally January through the end of June. If clearing or trimming occurs during the breeding season the Department recommends a qualified biologist conduct surveys for nesting birds within the project area prior to removal or trimming of vegetation. If nesting birds are present, delay implementing the project until after the nesting season. If that is not possible or if it is anticipated the project will not be in compliance with MBTA, the Department recommends contacting the USFWS for technical assistance. The USFWS will provide options to comply with the MBTA.

[1] https://s3.amazonaws.com/azgfd-portal-wordpress/PortalImages/files/wildlife/huntgame/eagles/BurrowingOwlClearanceProtocol_2009.pdf
[2] https://www.fws.gov/office/arizona-ecological-services/contact-us

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Enclosure 3 – AZGFD Scoping Comment on the SEIS

- If trenching or digging of large holes will occur, the Department recommends that trenching/digging and backfilling crews work together to minimize the amount of open trenches at any given time. Where trenches/holes cannot be backfilled immediately, the Department recommends escape ramps be constructed in each hole and at least every 90 meters in trenches. Escape ramps can be short lateral trenches or wooden planks sloping to the surface. The Department recommends that slopes be less than 45 degrees (1:1) and trenches and holes that have been left open be inspected to remove animals prior to backfilling.

- Invasive plant species can have detrimental effects on local ecosystems and fire regimes. As construction efforts will cause ground disturbance in which many invasive plant species could thrive, the Department recommends minimizing the potential introduction or spread of exotic invasive species by taking precautions such as washing and/or decontaminating all equipment utilized in the project activities before entering and leaving the site. Additionally, the Department recommends GSA employ invasive vegetation monitoring and treatment post construction. Please review the Arizona Department of Agriculture's website for a list of prohibited and restricted noxious weeds[3] and the Arizona Native Plant Society[4] for recommendations on control methods. To view a list of documented invasive species or to report invasive species in or near your project area visit iMapInvasives[5] – a national cloud-based application for tracking and managing invasive species.

Thank you for the opportunity to provide input on the Scoping for the Supplemental Environmental Impact Statement for the Raul Hector Castro Land Port of Entry and Proposed Commercial Land Port of Entry. For further coordination, please contact Laura Paulson, Region 5 Habitat Program Manager at lpaulson@azgfd.gov or (520) 388-4447.

Sincerely,

Raul A Vega

Raul Vega
Regional Supervisor

cc: Callie Calvacant, Habitat, Evaluation and Lands Branch Chief, AZGFD
Ginger Ritter, Project Evaluation Program Supervisor, AZGFD
Project Evaluation Program, AZGFD

AZGFD #M24-10215317

[3] https://agriculture.az.gov/pestspest-control/agriculture-pests/noxious-weeds
[4] https://aznps.com/invas
[5] https://imap.natureserve.org/imap/services/page/map.html

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Enclosure 3 – AZGFD Scoping Comment on the SEIS

Arizona Environmental Online Review Tool Report

Arizona Game and Fish Department Mission
To conserve Arizona's diverse wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations.

The Department requests further coordination to provide project/species specific recommendations. Please use the Project Evaluation Form to submit your project to the Project Evaluation Program at PEP@azgfd.gov.

Project Name:
Raul Castro LPOE Proposed Channel Reconstruction and Realignment

Project Type:
Water Use, Transfer, and Channel Activities, Water diversion/channelization

Project ID:
HGIS-23444

Project Description:
Proposed Channel Reconstruction and Realignment required for expansion of the Raul Castro LPOE in Douglas, Arizona. Current channel causes engineering conflicts with the expansion design, therefore a channel realignment and construction of a new detention basin is required.

Contact Person:
Laura Paulson

Organization:
Arizona Game and Fish Department

On Behalf Of:
AZGFD

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San Francisco, CA 94102
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Enclosure 3 – AZGFD Scoping Comment on the SEIS

Arizona Game and Fish Department — project_report_raul_castro_lpoe_proposed_c_82796_85215.pdf
Project ID: HGIS-23444 — Review Date: 10/31/2024 01:24:49 PM

Disclaimer:

1. This Environmental Review is based on the project study area that was entered. The report must be updated if the project study area, location, or the type of project changes.
2. This is a preliminary environmental screening tool. It is not a substitute for the potential knowledge gained by having a biologist conduct a field survey of the project area. This review is also not intended to replace environmental consultation (including federal consultation under the Endangered Species Act), land use permitting, or the Departments review of site-specific projects.
3. The Departments Heritage Data Management System (HDMS) data is not intended to include potential distribution of special status species. Arizona is large and diverse with plants, animals, and environmental conditions that are ever changing. Consequently, many areas may contain species that biologists do not know about or species previously noted in a particular area may no longer occur there. HDMS data contains information about species occurrences that have actually been reported to the Department. Not all of Arizona has been surveyed for special status species, and surveys that have been conducted have varied greatly in scope and intensity. Such surveys may reveal previously undocumented population of species of special concern.
4. Arizona Wildlife Conservation Strategy (AWCS), specifically Species of Greatest Conservation Need (SGCN), represent potential species distribution models for the State of Arizona which are subject to ongoing change, modification and refinement. The status of a wildlife resource can change quickly, and the availability of new data will necessitate a refined assessment.

Locations Accuracy Disclaimer:
Project locations are assumed to be both precise and accurate for the purposes of environmental review. The creator/owner of the Project Review Report is solely responsible for the project location and thus the correctness of the Project Review Report content.

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Recommendations Disclaimer:

1. The Department is interested in the conservation of all fish and wildlife resources, including those species listed in this report and those that may have not been documented within the project vicinity as well as other game and nongame wildlife.
2. Recommendations have been made by the Department, under authority of Arizona Revised Statutes Title 5 (Amusements and Sports), 17 (Game and Fish), and 28 (Transportation).
3. Potential impacts to fish and wildlife resources may be minimized or avoided by the recommendations generated from information submitted for your proposed project. These recommendations are preliminary in scope, designed to provide early considerations on all species of wildlife.
4. Making this information directly available does not substitute for the Department's review of project proposals, and should not decrease our opportunity to review and evaluate additional project information and/or new project proposals.
5. Further coordination with the Department requires the submittal of this Environmental Review Report with a cover letter and project plans or documentation that includes project narrative, acreage to be impacted, how construction or project activity(s) are to be accomplished, and project locality information (including site map). Once AGFD had received the information, please allow 30 days for completion of project reviews. Send requests to:
   Project Evaluation Program, Habitat Branch
   Arizona Game and Fish Department
   5000 West Carefree Highway
   Phoenix, Arizona 85086-5000
   Phone Number: (623) 236-7600
   Fax Number: (623) 236-7366
   Or
   PEP@azgfd.gov
6. Coordination may also be necessary under the National Environmental Policy Act (NEPA) and/or Endangered Species Act (ESA). Site specific recommendations may be proposed during further NEPA/ESA analysis or through coordination with affected agencies.

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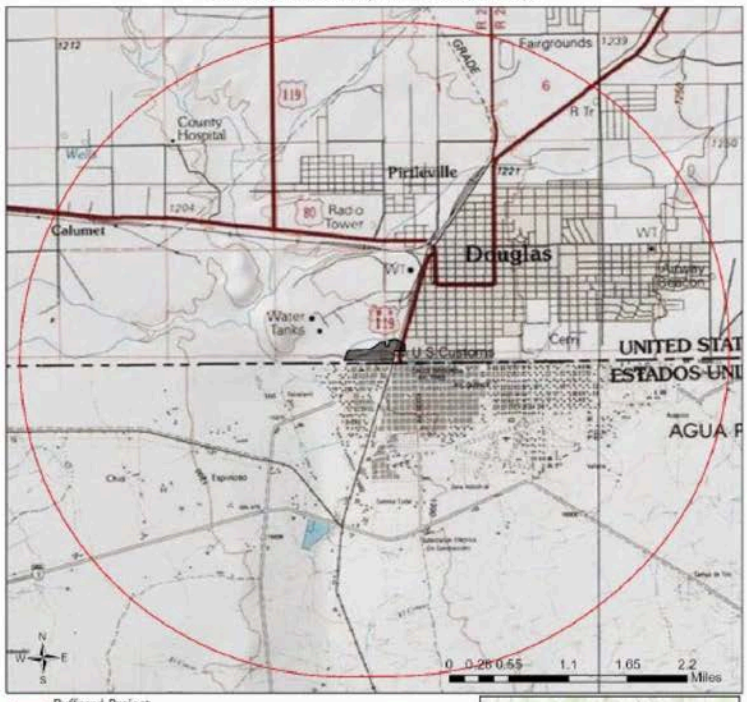
Raul Castro LPOE Proposed Channel Reconstruction and Realignment

USA Topo Basemap With Locator Map



Buffered Project Boundary

Project Boundary

Project Size (acres): 40.47

Lat/Long (DD): 31.3351 / -109.5634

County(s): Cochise

AGFD Region(s): Tucson

Township/Range(s): T24S, R27E

USGS Quad(s): DOUGLAS

County of Yavapai, Esri, TomTom, Garmin, FAO, NOAA, USGS, EPA, USFWS
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Esri, USGS

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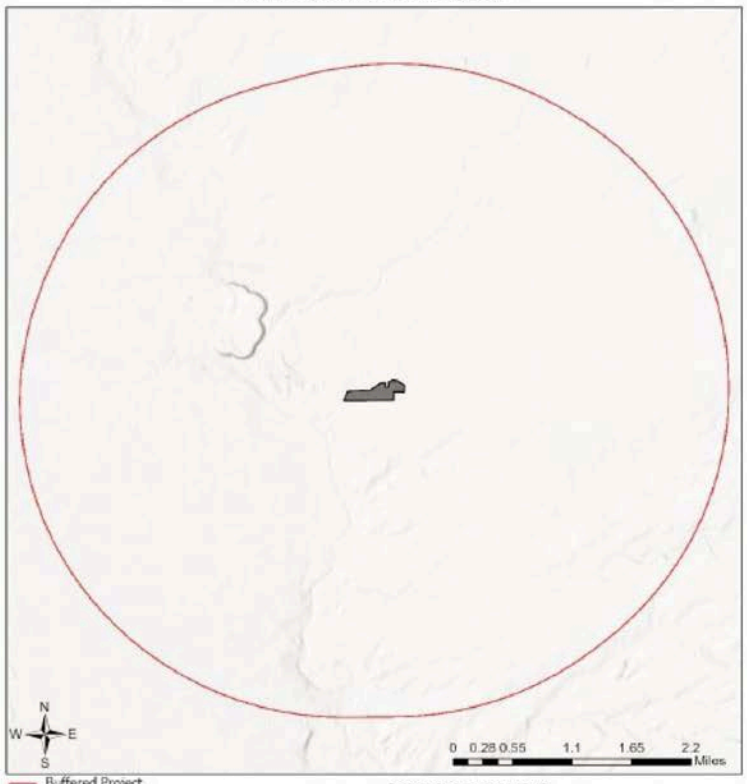
Raul Castro LPOE Proposed Channel Reconstruction and Realignment

Web Map As Submitted By User



Buffered Project Boundary
Project Boundary

Project Size (acres): 40.47
Lat/Long (DD): 31.3351 / -109.5634
County(s): Cochise
AGFD Region(s): Tucson
Township/Range(s): T24S, R27E
USGS Quad(s): DOUGLAS

Esri, NASA, FSA, USGS, FEMA

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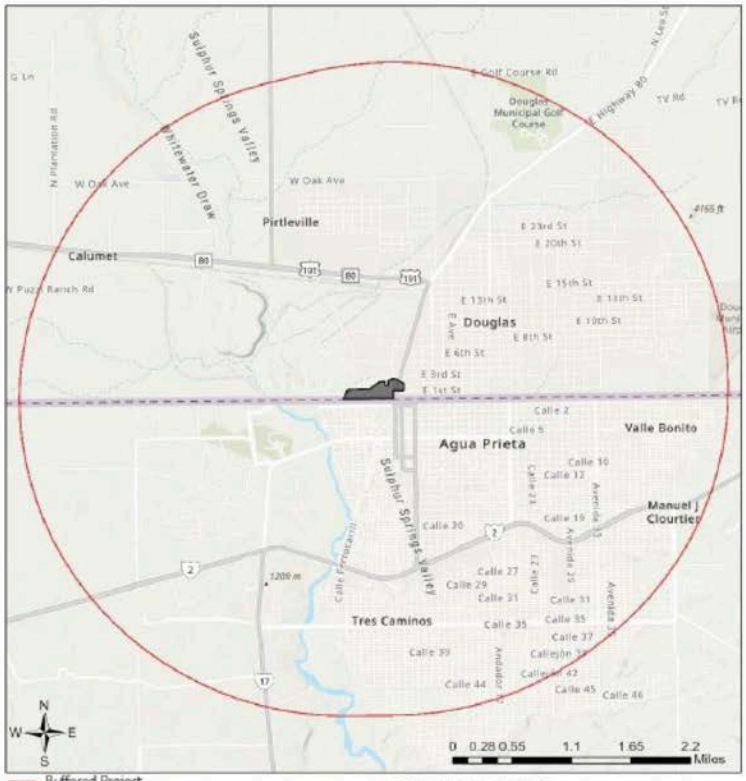
Raul Castro LPOE Proposed Channel Reconstruction and Realignment

Important Areas



Buffered Project Boundary
Project Boundary
Important Bird Areas
Critical Habitat
Pinal County Riparian
Wildlife Connectivity

Project Size (acres): 40.47
Lat/Long (DD): 31.3351 / -109.5634
County(s): Cochise
AGFD Region(s): Tucson
Township/Range(s): T24S, R27E
USGS Quad(s): DOUGLAS

Esri, NASA, FAO, USGS, FEMA, CONANP, Esri, TomTom, Garmin, Foursquare, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA, USFWS

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Raul Castro LPOE Proposed Channel Reconstruction and Realignment

Township/Ranges and Land Ownership

Buffered Project Boundary
Project Boundary
AZ Game & Fish Dept.
BLM
BOR
Indian Res.
Military
Mixed/Other
National Park/Mon.
Private
State & Regional Parks
State Trust
US Forest Service
Wildlife Area/Refuge
Township/Ranges

Project Size (acres): 40.47
Lat/Long (DD): 31.3351 / -109.5634
County(s): Cochise
AGFD Region(s): Tucson
Township/Range(s): T24S, R27E
USGS Quad(s): DOUGLAS

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Special Status Species Documented within 3 Miles of Project Vicinity

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Agosia chrysogaster chrysogaster	Gila Longfin Dace Refugia	SC		S		
Cyprinella formosa	Beautiful Shiner	LT				1
Gila purpurea	Yaqui Chub Refugia	LE				1
Heloderma suspectum	Gila Monster					1
Hypsiglena sp. nov.	Hooded Nightsnake					2
Incilius alvarius	Sonoran Desert Toad					2
Kinosternon sonoriense sonoriense	Desert Mud Turtle			S		2
Leopardus pardalis	Ocelot Area of Potential Occurrence	LE				1
Panthera onca	Jaguar Area of Potential Occurrence	LE				1
Phrynosoma cornutum	Texas Horned Lizard	SC				
Poeciliopsis occidentalis sonoriensis	Yaqui Topminnow Refugia	LE				1
Rana blairi	Plains Leopard Frog			S		1
Rana chiricahuensis	Chiricahua Leopard Frog Refugia	LT				1
Strix occidentalis lucida	Mexican Spotted Owl	LT		S		1
Terrapene ornata luteola	Desert Box Turtle			S		1

Note: Status code definitions can be found at https://www.azgfd.com/wildlife-conservation/on-the-ground-conservation/state-wildlife-action-plan/state-wildlife-action-plan-status-definitions/.

No Special Areas Detected
No special areas were detected within the project vicinity.

Species of Greatest Conservation Need Predicted that Intersect with Project Footprint as Drawn, based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Ammodramus savannarum ammolegus	Arizona grasshopper sparrow		S	S		2
Ammodramus savannarum perpallidus	Western Grasshopper Sparrow					2
Anthus spragueii	Sprague's Pipit	SC				2
Aquila chrysaetos	Golden Eagle			S		2
Artemisiospiza nevadensis	Sagebrush Sparrow					3
Asio otus	Long-eared Owl					2
Aspidoscelis sonorae	Sonoran Spotted Whiptail					2
Athene cunicularia hypugaea	Western Burrowing Owl	SC	S	S		2
Auriparus flaviceps	Verdin					2
Buteo regalis	Ferruginous Hawk	SC		S		2
Buteo swainsoni	Swainson's Hawk					2
Buteogallus anthracinus	Common Black Hawk					2
Calcarius ornatus	Chestnut-collared Longspur					2
Callipepla squamata	Scaled Quail					2

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Species of Greatest Conservation Need Predicted that Intersect with Project Footprint as Drawn, based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Calypte costae	Costa's Hummingbird					2
Campylorhynchus brunneicapillus	Cactus Wren					2
Catharus ustulatus	Swainson's Thrush					2
Chaetodipus baileyi	Bailey's Pocket Mouse					2
Chordeiles minor	Common Nighthawk					2
Coccyzus americanus	Yellow-billed Cuckoo (Western DPS)	LT	S	S		1
Columbina inca	Inca Dove					2
Corvus cryptoleucus	Chihuahuan Raven					2
Corynorhinus townsendii pallescens	Pale Townsend's Big-eared Bat	SC	S	S		1
Cynanthus latirostris	Broad-billed Hummingbird		S			2
Cynomys ludovicianus	Black-tailed Prairie Dog	CCA		S		1
Elgaria kingii	Madrean Alligator Lizard					2
Empidonax wrightii	Gray Flycatcher					2
Eumops perotis californicus	Greater Western Bonneted Bat	SC		S		2
Falco mexicanus	Prairie Falcon					2
Falco peregrinus anatum	American Peregrine Falcon	SC	S	S		1
Falco sparverius	American Kestrel					2
Haemorhous cassinii	Cassin's Finch					2
Heloderma suspectum	Gila Monster					1
Hypsiglena sp. nov.	Hooded Nightsnake					2
Icterus bullockii	Bullock's Oriole					2
Icterus cucullatus	Hooded Oriole					2
Incilius alvarius	Sonoran Desert Toad					2
Kinosternon flavescens	Yellow Mud Turtle					2
Lanius ludovicianus	Loggerhead Shrike	SC				2
Lasiurus cinereus	Hoary Bat					2
Lasiurus frantzii	Desert Red Bat		S			2
Lasiurus xanthinus	Western Yellow Bat		S			2
Leptonycteris yerbabuenae	Lesser Long-nosed Bat	SC		S		1
Lepus alleni	Antelope Jackrabbit					2
Megascops kennicottii	Western Screech-owl					2
Melanerpes uropygialis	Gila Woodpecker					2
Melospiza lincolnii	Lincoln's Sparrow					2
Micrathene whitneyi	Elf Owl					3
Myotis auriculus	Southwestern Myotis					2
Myotis velifer	Cave Myotis	SC		S		2
Myotis yumanensis	Yuma Myotis	SC				2
Notiosorex cockrumi	Cockrum's Desert Shrew					2
Nyctinomops femorosaccus	Pocketed Free-tailed Bat					2

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Species of Greatest Conservation Need Predicted that Intersect with Project Footprint as Drawn, based on Predicted Range Models

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Nyctinomops macrotis	Big Free-tailed Bat	SC				2
Parabuteo unicinctus	Harris's Hawk					2
Passerculus sandwichensis	Savannah Sparrow					2
Peucaea botterii arizonae	Arizona Botteri's Sparrow			S		2
Peucaea carpalis	Rufous-winged Sparrow					2
Phrynosoma solare	Regal Horned Lizard					2
Pooecetes gramineus	Vesper Sparrow					2
Rana blairi	Plains Leopard Frog			S		1
Rana chiricahuensis	Chiricahua Leopard Frog	LT		S		1
Rana yavapaiensis	Lowland Leopard Frog	SC	S	S		1
Spizella breweri	Brewer's Sparrow					2
Tadarida brasiliensis	Brazilian Free-tailed Bat					2
Terrapene ornata	Ornate Box Turtle			S		1
Toxostoma bendirei	Bendire's Thrasher					2
Tyrannus crassirostris	Thick-billed Kingbird		S			2

Species of Economic and Recreation Importance Predicted that Intersect with Project Footprint as Drawn

Scientific Name	Common Name	FWS	USFS	BLM	NPL	SGCN
Callipepla gambelii	Gambel's Quail					
Callipepla squamata	Scaled Quail					
Patagioenas fasciata	Band-tailed Pigeon					
Pecari tajacu	Javelina					
Puma concolor	Mountain Lion					
Zenaida asiatica	White-winged Dove					
Zenaida macroura	Mourning Dove					

Project Type: Water Use, Transfer, and Channel Activities, Water diversion/channelization

Project Type Recommendations:
During the planning stages of your project, please consider the local or regional needs of wildlife in regards to movement, connectivity, and access to habitat needs. Loss of this permeability prevents wildlife from accessing resources, finding mates, reduces gene flow, prevents wildlife from re-colonizing areas where local extirpations may have occurred, and ultimately prevents wildlife from contributing to ecosystem functions, such as pollination, seed dispersal, control of prey numbers, and resistance to invasive species. In many cases, streams and washes provide natural movement corridors for wildlife and should be maintained in their natural state. Uplands also support a large diversity of species, and should be contained within important wildlife movement corridors. In addition, maintaining biodiversity and ecosystem functions can be facilitated through improving designs of structures, fences, roadways, and culverts to promote passage for a variety of wildlife. Guidelines for many of these can be found at: https://www.azgfd.com/wildlife-conservation/planning-for-wildlife/planning-for-wildlife-wildlife-friendly-guidelines/.

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Minimize the potential introduction or spread of exotic invasive species, including aquatic and terrestrial plants, animals, insects and pathogens. Precautions should be taken to wash and/or decontaminate all equipment utilized in the project activities before entering and leaving the site. See the Arizona Department of Agriculture website for a list of prohibited and restricted noxious weeds at https://www.invasivespeciesinfo.gov/unitedstates/az.shtml and the Arizona Native Plant Society https://aznps.com/invas for recommendations on how to control. To view a list of documented invasive species or to report invasive species in or near your project area visit iMapInvasives - a national cloud-based application for tracking and managing invasive species at https://imap.natureserve.org/imap/services/page/map.html.

- To build a list: zoom to your area of interest, use the identify/measure tool to draw a polygon around your area of interest, and select "See What's Here" for a list of reported species. To export the list, you must have an account and be logged in. You can then use the export tool to draw a boundary and export the records in a csv file.

Minimization and mitigation of impacts to wildlife and fish species due to changes in water quality, quantity, chemistry, temperature, and alteration to flow regimes (timing, magnitude, duration, and frequency of floods) should be evaluated. Minimize impacts to springs, in-stream flow, and consider irrigation improvements to decrease water use. If dredging is a project component, consider timing of the project in order to minimize impacts to spawning fish and other aquatic species (include spawning seasons), and to reduce spread of exotic invasive species. We recommend early coordination with Project Evaluation Program for projects that could impact water resources, wetlands, streams, springs, and/or riparian habitats.

Consider incorporating project components that may allow for the inclusion to promote, enhance, create, or restore wildlife habitat. Contact Project Evaluation Program for further information and opportunities, PEP@azgfd.gov or (623) 236-7600 or https://www.azgfd.com/agency/offices/.

Project Location and/or Species Recommendations:
Your project site is within one or more defined **Areas of Possible Occurrence**. Please follow Department protocols while working within an Area of Potential Occurrence at U:\Agency Directives\Jaguar Ocelot and Mexican Wolf Management Directive 20171215.pdf

HDMS records indicate that one or more **Listed, Proposed, or Candidate** species or **Critical Habitat** (Designated or Proposed) have been documented in the vicinity of your project. The Endangered Species Act (ESA) gives the US Fish and Wildlife Service (USFWS) regulatory authority over all federally listed species. Please contact USFWS Ecological Services Offices at https://www.fws.gov/office/arizona-ecological-services or:

Phoenix Main Office
9828 North 31st Avenue #C3
Phoenix, AZ 85051-2517
Phone: 602-242-0210
Fax: 602-242-2513

Tucson Sub-Office
201 N. Bonita Suite 141
Tucson, AZ 85745
Phone: 520-670-6144
Fax: 520-670-6155

Flagstaff Sub-Office
SW Forest Science Complex
2500 S. Pine Knoll Dr.
Flagstaff, AZ 86001
Phone: 928-556-2157
Fax: 928-556-2121

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Enclosure 4 – USFWS Scoping Comments on the SEIS

United States Department of the Interior
Fish and Wildlife Service
Arizona Ecological Services Office
9828 North 31st Avenue, Suite C3
Phoenix, Arizona 85051
Telephone: (602) 242-0210 Fax: (602) 242-2513

In reply refer to:
ECOSphere Number: 2023-0106212

November 1, 2024

Osmahn Kadri, NEPA Project Manager
U.S. General Services Administration
c/o Potomac-Hudson Engineering, Inc.
77 Upper Rock Circle, Suite 302
Rockville, Maryland, 20850

Dear Osmahn Kadri:

This letter documents our response to your intent to prepare a Supplemental Environmental Impact Statement (SEIS) and scoping request. We understand that the project under consideration is a proposed flood channel realignment and expansion of the current retention basin located west of the Raul Hector Castro (RHC) Land Port of Entry (LPOE) in Douglas, Arizona.

We refer you to our submitted comments in response to your EIS Scoping request and public comment period for your Draft EIS for information on Section 7(a)(2) of the Endangered Species Act (ESA) and it's implementing regulations (50 CFR 402 *et seq.*) as well both 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.).

Here we address potential adverse impacts of the proposed flood channel realignment and expansion of the current retention basin on federally listed species and designated critical habitats. We acknowledge your use of our Information for Planning and Consultation (IPaC) tool and request of an official species list from our office on July 19, 2023, which identified 9 species that could be affected by the proposed project.

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 from project implementation. Specifically, we encourage you to consider the following:

Construction Noise: Project implementation is likely to increase the ambient noise levels from construction activities and equipment. Several species that could occur within the action area are sensitive to anthropogenic disturbance and could experience adverse effects.

Habitat Alteration: Project implementation is likely to alter specific components of habitat through vegetation removal, dust creation, and altered hydrology, as ground and soil disturbance.

Enclosure 4 – USFWS Scoping Comments on the SEIS

Osmahn Kadri

These components may alter foraging, nesting, roosting, or prey availability for federally listed species.

Sedimentation and Water Diversion: Water is a critical component in shaping habitats in arid environments. The quantify and timing of water often determines the floral and faunal communities of an area. Altering flow and increasing sedimentation could adversely affect local ecosystem processes upon which listed species rely.

Thank you for considering threatened and endangered species in your project design. If you have specific project-related concerns about species that occur within the action area, we are happy to provide technical assistance.

In addition, we urge you coordinate project planning with potentially interested tribes that may have cultural affiliations in the area of project implementation, as tribal consultation is vital to the preservation of tribal culture.

Lastly, also recommend you seek additional information and coordinate your project with the Arizona Game and Fish Department. 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 (https://www.azgfd.com/wildlife/planning/projevalprogram/).

Please continue to coordinate with our Arizona Ecological Services Office in Tucson throughout the design and implementation of the proposed project. For further assistance, please contact Cassondra Walker (cassondra_walker@fws.gov) or Julie McIntyre (julie_mcintyre@fws.gov). Please refer to the project number 2023-0106212. Thank you for your continued efforts to conserve endangered species.

Sincerely,

JULIE MCINTYRE
Digitally signed by JULIE MCINTYRE
Date: 2024.11.01 13:02:03 -07'00'

for Heather Whitlaw
Field Supervisor

Cc (electronic):

Preservation Officer, Cultural Preservation Office, Hopi Tribe, Kykotsmovi, AZ

Preservation Officer, Historic Preservation Office, Pascua Yaqui Tribe, Tucson, AZ

Director, Historic Preservation and Archaeology Department, San Carlos Apache Tribe, San Carlos, AZ

Manager, Cultural Affairs, Tohono O'odham Nation, Sells, AZ

Cultural Coordinator, Environmental Programs, Fort Sill Apache Tribe, Apache, OK

U.S. FISH AND WILDLIFE SERVICE
REGION 2—SOUTHWEST
ARIZONA, NEW MEXICO, OKLAHOMA, TEXAS

U.S. General Services Administration
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San Francisco, CA 94102
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B.1.2 USFWS Response Letter to GSA Informal Consultation (Section 7 of ESA) – February 3, 2025

United States Department of the Interior
Fish and Wildlife Service
Arizona Ecological Services Field Office
9828 North 31st Avenue, Suite C3
Phoenix, Arizona 85051
Telephone: (602) 242-0210 Fax: (602) 242-2513

In Reply refer to:
ECOSphere Project Number:
2023-0106212

February 3, 2025

Osmahn Kadri, NEPA Program Manager
U.S. General Services Administration
50 United Nations Plaza
San Francisco, California 94102

Subject: Expansion and Modernization of the Raul Hector Castro Land Port of Entry (LPOE) Retention Basin

Dear Osmahn Kadri:

This letter responds to your request for consultation with us, the U.S. Fish and Wildlife Service (USFWS), pursuant to Section 7 of the Endangered Species Act of 1973, as amended (16 U.S.C. § 1531 et seq.) for the above referenced action dated January 8, 2025. This project has been given the USFWS tracking number 2023-0106212. Please use this tracking number in all future correspondence related to this action.

Per 50 CFR 402.14(c), the following information is required to initiate formal consultation, although this information is useful for the informal consultation process as well and is generally included in a Biological Evaluation (BE) or Biological Assessment (BA):

1. A description of the proposed action. Consistent with the nature and scope of the proposed action, the description shall provide sufficient detail to assess the effects of the action on listed species and critical habitat, including:
    a. The purpose of the action;
    b. The duration and timing of the action;
    c. The location of the action;
    d. The specific components of the action and how they will be carried out;
    e. Maps, drawings, blueprints, or similar schematics of the action; and
    f. Any other available information related to the nature and scope of the proposed action relevant to its effects on listed species or designated critical habitat.

1

2. A map or description of all areas to be affected directly or indirectly by the Federal action, and not merely the immediate area involved in the action (*i.e.*, the action area as defined at §402.02).
3. Information obtained by or in the possession of the Federal agency and any applicant on the listed species and designated critical habitat in the action area including available information such as the presence, abundance, density, or periodic occurrence of listed species and the condition and location of the species' habitat, including any critical habitat.
4. A description of the effects of the action and an analysis of any cumulative effects.
5. A summary of any relevant information provided by the applicant, if available.
6. Any other relevant available information on the effects of the proposed action on listed species or designated critical habitat, including any relevant reports such as environmental impact statements and environmental assessments.

We appreciate your initiation of consultation and after reviewing your submitted documents we require more information to begin consultation. If the section does not have an X marked in the box to the left, information is still needed for us to complete our evaluation. Specific to your proposed project the request is as follows:

☐ IPaC *Species Checklist and Ecosphere Project Number*

We thank you for using IPaC to generate an official species list from our office. This has generated a consultation number in our project tracking software (ECOSphere).

However, we see that your list is not current within 90 days, qs required per 50 CFR 402.12(e). To update your species list, simply log into IPaC and request a new list under this project. It should be noted that only individuals with access to this project in IPaC can request an updated species list. Please reach out if you have any questions or concerns.

☒ *Determinations*

The documents you submitted for consultation initiation are consistent and identify your effect determination for all species and critical habitats found on the official species list. We understand your determinations to be (NLAA = Not likely to adversely affect; NE = no effect):

- Jaguar—NLAA
- Yellow-billed cuckoo—NLAA
- Ocelot—NLAA
- Northern Aplomado Falcon—NE
- Chiricahua Leopard Frog—NE
- Gila Topminnow—NE
- Yaqui Catfish—NE
- Yaqui Chub—NE
- Beautiful Shiner—NE
- Arizona Eryngo—NE

Osmahn Kadri, NEPA Program Manager
Douglas Land Port of Entry Retention Basin

2023-0106212

☒ *Action Agency*

You have identified the U.S. General Services Administration (GSA) as the agency with which we will be consulting. In addition, you have provided us contact information for the project lead, Osmahn Kadri, with whom we will communicate concerning this consultation.

☒ *Project Objective*

You have adequately described the proposed project objective. We understand this object to be the realignment of the Rose Avenue channel and construction of a new stormwater basin.

☒ *Project Implementation*

The biological evaluation (BE) you submitted adequately deconstructs the proposed project into activities where it is clear what tasks, tools, equipment, and personnel are involved. We understand your proposed action includes the following project elements: 1) Construct an approximately 2,500-foot-long stormwater channel; 2) evaluate and improve the existing concrete box culvert beneath the LPOE; 3) extend the existing concrete box culvert to the west and terminate it immediately west of the existing repatriation drop off location; 4) demolish the existing stormwater channel that parallels the western side of Pan American Avenue between east 3rd street and the southern end of the existing LPOE; 5) install a new CBC where the proposed stormwater channel crosses Chino Road; 6) as necessary, construct a maintenance road on either the north or south side of the proposed stormwater channel for maintenance access; 7) construct security fencing on the north side of the proposed stormwater channel; 8) construct a 5-acre stormwater basin between the LPOE and Chino Road and north of the proposed stormwater channel; and 9) obtain all necessary land and right-of-way permissions for the stormwater channel segment and stormwater basin.

☒ *Project and Action Areas*

Thank you for providing a clearly defined project area and associated action area such that the farthest-reaching effects to the environment are spatially captured (1,000 ft buffer of project area). We agree that this action area appropriately represents the environment affected by the proposed action.

☐ *Project Timeline*

We are unclear on the exact timing of your proposed action. We understand that construction will take up to 6 months and will occur within the timeframe of the expansion and modernization project, but activities will occur before LPOE activities.

3

We would like to confirm for our understanding that this proposed project is expected to begin in 2025 and last no more than 6 months such that this project would not exceed December 31, 2025, at the latest. Is that correct?

☒ *Environmental Baseline*

The BA provides sufficient information on the current condition of each species as provided in the concurrence letter (2023-0035776-S7-001) for the construction and modernization of the LPOE.

☒ *Project Effects*

Potential effects to species from the proposed action have been addressed in the BE as well as concerns raised during the EIS scoping period.

☐ *Cumulative Effects*

Do you know of any cumulative effects that should be brought to our attention when analyzing the effects of the proposed project?

☒ *Final Action Agency Effect Determinations*

Effect determinations for species and critical habitats appear consistent with the effects analyses provided.

☒ *NEPA Check*

It is clear that the proposed project has been through the EIS scoping period as part of the NEPA process. We have not yet seen the draft EIS which includes this project, although we understand that this proposed project only has one alternative to the no-action alternative.

☒ *Novelty and Miscellaneous Concerns*

This proposed project does not propose novel actions and novel effects are not anticipated. In addition, we have not identified any further concerns about the proposed action at this time. If further questions arise, we will reach out to your project lead.

☐ *Post Review Check-In Requested*

We do not see a need to request a meeting on this proposed project, rather it is sufficient for us for your project lead to communicate any additional information needs identified above. However, we are fully agreeable to schedule a meeting at your request, if you feel one is warranted. We look forward to working with you on this proposed project.

To finish the consultation initiation process, we request the needed information identified above from you. Please ensure all information requests are sent to the appropriate AESFO biologist, identified below, as well as the AESFO inbox (incomingazcorr@fws.gov). We look forward to our continued collaboration on this proposed project to ensure the conservation of threatened and endangered species and critical habitat. If you have any questions regarding this consultation, please contact Cassondra Walker (cassondra_walker@fws.gov) or Julie McIntyre (julie_mcintyre@fws.gov).

Sincerely,

HEATHER WHITLAW
Digitally signed by HEATHER WHITLAW
Date: 2025.02.03 18:17:01 -07'00'

Heather Whitlaw
Field Supervisor

B.2 CULTURAL CONSULTATION

B.2.1 GSA Letter to Arizona SHPO regarding Effect Determination for Proposed Commercial LPOE (May 28, 2024) and SHPO response (June 21, 2024)

SHPO-2024-0501 (175136) Rec: 05-28-24

GSA

Pacific Rim Region

May 28, 2024

Kathryn Leonard
State Historic Preservation Officer
Arizona State Parks
1100 West Washington Street
Phoenix, AZ 85007

Attention: Erin Davis

Re: Bipartisan Infrastructure Law - Proposed Project to Construct a New Commercial Port of Entry Douglas, AZ

Dear Kathryn Leonard:

The U. S. General Services Administration (GSA) received your staff's verbal comments regarding our most recent letter on Raul Hector Castro (RHC) Land Port of Entry (LPOE), formerly known as the U.S. Inspection Station, in Douglas, AZ, dated April 23, 2024. GSA appreciates the comments and is submitting this letter on the construction of the new commercial port of entry as a separate undertaking as requested.

As previously described, GSA is proposing a project to construct a new commercial port of entry approximately five miles west of the existing Raul Hector Castro Land Port of Entry off James Ranch Road. This project has developed as a separate undertaking as it has a different funding stream, schedule, and is not contingent on the completion of the project to expand the existing Raul Hector Castro Land Port of Entry. The Area of Potential Effects, comprising approximately 104.6-acres of vacant land, was surveyed twice. First in 2022 at the onset of the project, and second in 2024 when a 24.14-acre vacant parcel under the jurisdiction of the Bureau of Land Management (BLM) was determined necessary for the construction of the new commercial port. All survey information and findings are documented in the revised *Cultural Resources Memo for the Douglas Land Port of Entry Environmental Impact Statement, Douglas, Cochise County, Arizona* (Cultural Resources Memo), enclosed with this letter.

As documented in the Cultural Resources Memo, no archeological sites were identified on the 104.6-acre project area of the new commercial port. Figure 5 of the Cultural Resources Memo shows an aerial image with survey coverage. Through previous concurrence of eligibility determinations on October 17, 2023, and with the additional survey information that no sites were found on the BLM parcel, GSA has determined the construction of the new commercial port of entry will have no effect on historic properties. **In accordance with 36 CFR 800.4(d)(1), GSA requests your concurrence with the**

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San Francisco, CA 94102
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determination of No Historic Properties Affected for the Construction of the New Commercial Port of Entry in Douglas, AZ.

I have provided the enclosed documentation for your review and comment. If you have any questions or concerns, please contact me at jason.hagin@gsa.gov or (415) 244-7760. I look forward to hearing from you.

Sincerely,

JASON HAGIN

Digitally signed by JASON HAGIN
Date: 2024.05.28 14:37:24 -07'00'

Jason Hagin
Regional Historic Preservation Officer, Design & Construction Division
U.S. General Services Administration
Pacific Rim Region

Enclosures: Douglas LPOE CR Memo

JH:NL

CC VIA EMAIL:
Beth L. Savage, Federal Preservation Officer, GSA , beth.savage@gsa.gov
Chris Koeppel, Advisory Council on Historic Preservation, ckoeppel@achp.gov
Melissa Wiedenfeld, U.S. Customs and Border Protection, melissa.wiedenfeld@cbp.dhs.gov
Jim McPherson, President, Board of Directors, Arizona Preservation Foundation, jmcphersoniii@gmail.com
Luis Pedroza, Deputy City Manager, City of Douglas, luis.pedroza@douglasaz.gov

CONCUR. No Historic Properties Affected.

Erin Davis
Archaeological Compliance Specialist
Arizona State Historic Preservation Office
June 21, 2024

B.2.2 GSA Letter to Arizona SHPO regarding updated Area of Potential Effect for Undertaking at the RHC LPOE (November 8, 2024) and SHPO response (December 6, 2024)

SHPO-2023-0070 (177828) **Rec: 11-08-24**

Pacific Rim Region

November 8, 2024

VIA ELECTRONIC MAIL

Kathryn Leonard
State Historic Preservation Officer
Arizona State Parks
1100 West Washington Street
Phoenix, AZ 85007

Attention: Erin Davis

Re: Bipartisan Infrastructure Law - Reconfiguration and Expansion of the Raul Hector Castro Land Port of Entry, Douglas, AZ
SHPO-2023-0070 (167446)

Dear Kathryn Leonard:

The U. S. General Services Administration (GSA) has been consulting with your office on the reconfiguration and expansion of the Raul Hector Castro (RHC) Land Port of Entry (LPOE), formerly known as the U.S. Inspection Station, in Douglas, AZ. In support of this Undertaking, in April 2024, GSA submitted for your review and concurrence a revised *Cultural Resources Memo for the Douglas Land Port of Entry Environmental Impact Statement, Douglas, Cochise County, Arizona* (CR Memo).

The initial CR Memo was originally sent January 17, 2023 and was first revised and resubmitted to the SHPO in September 2023 when GSA extended the Area of Potential Effect (APE) to include an area of land immediately to the east of the existing RCH LPOE as a potential expansion opportunity. The January 2023 CR Memo was then revised again in April 2024 to include a small parcel of land under the jurisdiction of the Bureau of Land Management, which updated the APE for the Commercial Port. In May 2024, GSA separated the Undertaking for the New Commercial Port from the Undertaking for the Reconfiguration and Expansion of the Raul Hector Castro Land Port of Entry.

As planning for this Undertaking has continued, GSA has now determined that additional land to the west of the RHC is needed for site storm water retention and drainage; therefore, please find enclosed with this letter a revised APE map for the subject Undertaking. GSA has contracted with Potomac-Hudson Engineering, an environmental, planning, and technology consulting firm, to survey the land and update the CR Memo to reflect this potential expansion. When the CR Memo has been updated to reflect the results of the planned archeological survey, GSA will submit the revised CR Memo to SHPO for review and comment. GSA will also be prepared to review this information during our upcoming consultation meeting on Friday, November 15th, during the tour and in meeting discussions.

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San Francisco, CA 94102
www.gsa.gov

By copy of this letter, we are notifying consulting parties of ongoing planning considerations and the change in the APE. **GSA seeks your concurrence on the updated APE.** Please review the enclosed documentation. GSA looks forward to receiving your comments and answering any questions related to this revision.

Thank you for your assistance. If you have any questions or concerns, please contact me at jason.hagin@gsa.gov or (415) 244-7760. We look forward to you joining the Consulting Parties Meeting on November 15th.

Sincerely,

JASON HAGIN

Digitally signed by JASON HAGIN
Date: 2024.11.08 15:58:12 -08'00'

Jason Hagin
Regional Historic Preservation Officer, Design & Construction Division
U.S. General Services Administration
Pacific Rim Region

CONCUR. We look forward to reviewing the results of the cultural resources survey of the additional 20.17 acres that have been added to the APE.

Erin Davis
Archaeological Compliance Specialist
Arizona State Historic Preservation Office
December 6, 2024

Enclosures

JH:NL

CC VIA EMAIL:
Beth L. Savage, Federal Preservation Officer, GSA, beth.savage@gsa.gov
Katharine Cline, Historic Preservation Specialist, ACHP, kcline@ACHP.gov
Melissa Wiedenfeld, U.S. Customs and Border Protection, melissa.wiedenfeld@cbp.dhs.gov
Chris Kim, U.S. Customs and Border Protection, chris.y.kim@cbp.dhs.gov
Kathryn Leonard, State Historic Preservation Officer, AZ SHPO, kleonard@azstateparks.gov
Susan Lawson, Historical Architect, AZ SHPO, slawson@azstateparks.gov
Erin Davis, Archeological Compliance Specialist, AZ SHPO, edavis@azstateparks.gov
Donald Huish, Mayor, City of Douglas, donald.huish@douglasaz.gov
Ana Urquijo, City Manager, City of Douglas, ana.urquijo@douglasaz.gov
Luis Pedroza, Deputy City Manager, City of Douglas, luis.pedroza@douglasaz.gov
Elise Moore, Public Works Director, City of Douglas, elise.moore@douglasaz.gov
Ray Shelton, City Council Member, City of Douglas, ray.shelton@douglasaz.gov
Betsy Merritt, Deputy General Counsel, NTHP, bmerritt@savingplaces.org
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Jim McPherson, President, Board of Directors, APF, jmcphersoniii@gmail.com
Demion Clinco, President, Tucson Historic Preservation Foundation, demionclinco@gmail.com
Diana LaMar, Community Advocate, dianalamar@me.com
Steven Helffrich, Architect, studioarchaz@gmail.com
Cindy Hayostek, Douglas Historical Society, chayostek2@gmail.com
Abe Villareal, Dean, Cochise Community College Campus,

B.2.3 GSA Letter to Arizona SHPO regarding updated Area of Potential Effect for Undertaking at the RHC LPOE (January 7, 2025)

GSA

Pacific Rim Region

January 7, 2025

VIA ELECTRONIC MAIL

Kathryn Leonard
State Historic Preservation Officer
Arizona State Parks
1100 West Washington Street
Phoenix, AZ 85007

Attention: Erin Davis

Re: Bipartisan Infrastructure Law - Reconfiguration and Expansion of the Raul Hector Castro Land Port of Entry, Douglas, AZ
SHPO-2023-0070 (167446)

Dear Kathryn Leonard:

The U. S. General Services Administration (GSA) has been consulting with your office on the reconfiguration and expansion of the Raul Hector Castro (RHC) Land Port of Entry (LPOE), formerly known as the U.S. Inspection Station, in Douglas, AZ. In support of this undertaking, in a letter dated November 8, 2024, GSA notified your office and consulting parties of a change in the Area of Potential Effects (APE) and requested your concurrence on an updated APE, which GSA expanded to include a newly acquired 20.17 acres parcel to the west of the RHC LPOE needed for site stormwater retention and drainage. Your concurrence with the updated APE was received on December 6, 2024.

As planning for this undertaking has continued, GSA has now determined that an additional segment of land adjacent to the border at the far southwest corner of the added parcel will be necessary for construction staging operations during connection of the proposed new stormwater channel, expanding the APE an additional 2.32 acres. Please find enclosed with this letter a revised APE map for the subject undertaking.

In support of this undertaking, GSA has contracted with Potomac-Hudson Engineering, an environmental, planning, and technology consulting firm, to survey the land and update the *Cultural Resources Memo for the Douglas Land Port of Entry Environmental Impact Statement, Douglas, Cochise County, Arizona* (CR Memo) to reflect this potential expansion. When the CR Memo has been updated to reflect the results of the archeological survey, GSA will submit the revised CR Memo to SHPO for review and comment.

By copy of this letter, we are notifying consulting parties of ongoing consultation. **GSA requests your concurrence with the revised APE**. Please review the enclosed documentation and provide GSA with your comments. Thank you for your assistance. If you have any questions or

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San Francisco, CA 94102
www.gsa.gov

concerns, please contact me at jason.hagin@gsa.gov or (415) 244-7760. We look forward to hearing from you.

Sincerely,

JASON HAGIN

Digitally signed by JASON HAGIN
Date: 2025.01.07 15:31:56 -08'00'

Jason Hagin
Regional Historic Preservation Officer, Design & Construction Division
U.S. General Services Administration
Pacific Rim Region

Enclosures

JH:JH

CC VIA EMAIL:
Beth L. Savage, Federal Preservation Officer, GSA, beth.savage@gsa.gov
Katharine Cline, Historic Preservation Specialist, ACHP, kcline@ACHP.gov
Melissa Wiedenfeld, U.S. Customs and Border Protection, melissa.wiedenfeld@cbp.dhs.gov
Chris Kim, U.S. Customs and Border Protection, chris.y.kim@cbp.dhs.gov
Kathryn Leonard, State Historic Preservation Officer, AZ SHPO, kleonard@azstateparks.gov
Susan Lawson, Historical Architect, AZ SHPO, slawson@azstateparks.gov
Erin Davis, Archeological Compliance Specialist, AZ SHPO, edavis@azstateparks.gov
Ana Urquijo, City Manager, City of Douglas, ana.urquijo@douglasaz.gov
Luis Pedroza, Deputy City Manager, City of Douglas, luis.pedroza@douglasaz.gov
Elise Moore, Public Works Director, City of Douglas, elise.moore@douglasaz.gov
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Betsy Merritt, Deputy General Counsel, NTHP, bmerritt@savingplaces.org
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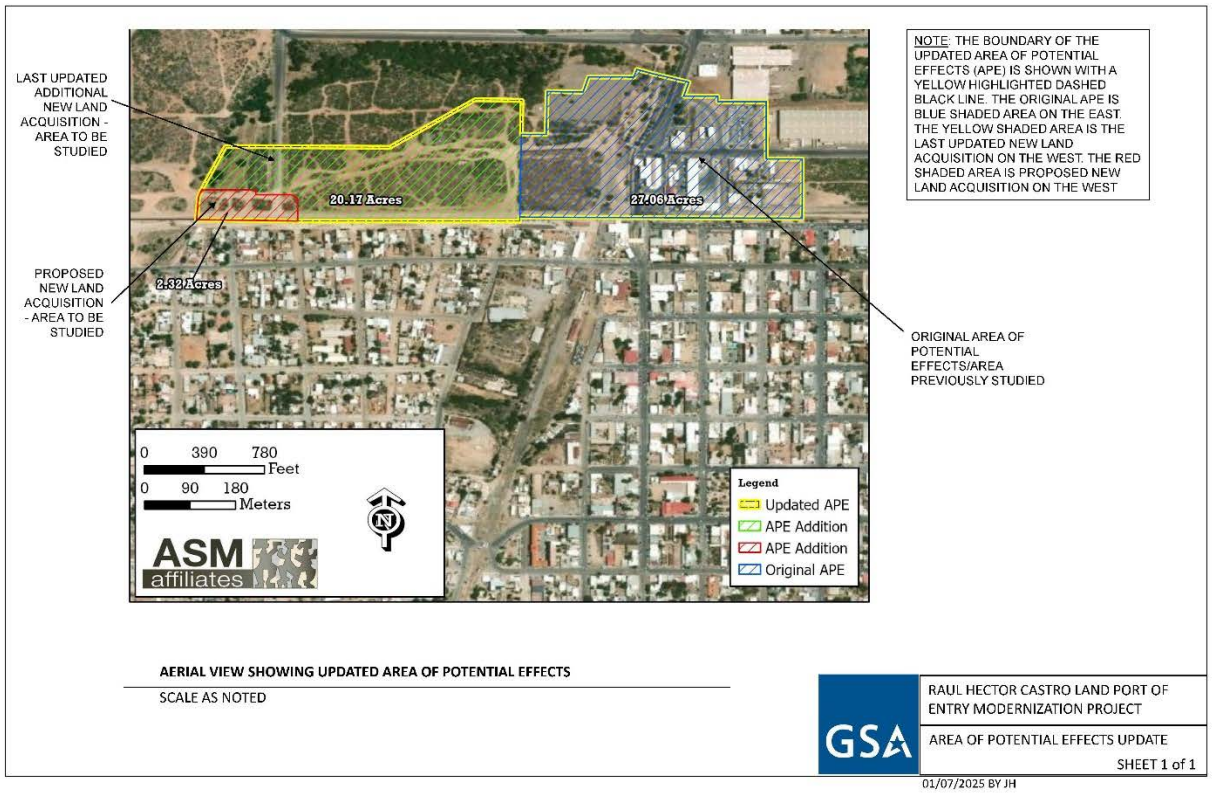
Steven Helffrich, Architect, studioarchaz@gmail.com
Cindy Hayostek, Douglas Historical Society, chayostek2@gmail.com
Abe Villareal, Dean, Cochise Community College Campus,


LAST UPDATED ADDITIONAL NEW LAND ACQUISITION - AREA TO BE STUDIED
PROPOSED NEW LAND ACQUISITION - AREA TO BE STUDIED
20.17 Acres
27.06 Acres
2.32 Acres
NOTE: THE BOUNDARY OF THE UPDATED AREA OF POTENTIAL EFFECTS (APE) IS SHOWN WITH A YELLOW HIGHLIGHTED DASHED BLACK LINE. THE ORIGINAL APE IS BLUE SHADED AREA ON THE EAST. THE YELLOW SHADED AREA IS THE LAST UPDATED NEW LAND ACQUISITION ON THE WEST. THE RED SHADED AREA IS PROPOSED NEW LAND ACQUISITION ON THE WEST
ORIGINAL AREA OF POTENTIAL EFFECTS/AREA PREVIOUSLY STUDIED
0 390 780 Feet
0 90 180 Meters
ASM affiliates
Legend
Updated APE
APE Addition
APE Addition
Original APE
AERIAL VIEW SHOWING UPDATED AREA OF POTENTIAL EFFECTS
SCALE AS NOTED
GSA
RAUL HECTOR CASTRO LAND PORT OF ENTRY MODERNIZATION PROJECT
AREA OF POTENTIAL EFFECTS UPDATE
SHEET 1 of 1
01/07/2025 BY JH

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APPENDIX C – GENERAL CONFORMITY ANALYSIS

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TABLE OF CONTENTS

LIST OF TABLES

ACRONYMS AND ABBREVIATIONS

ADEQ	Arizona Department of Environmental Quality
AQCRs	Air Quality Control Regions
BLM	Bureau of Land Management
CAA	Clean Air Act
CBC	concrete box culvert
CFR	*Code of Federal Regulations*
CO	Carbon Monoxide
EIS	Environmental Impact Statement
GCR	General Conformity Rule
GSA	U.S. General Services Administration
LPOE	Land Port of Entry
NAAQS	National Ambient Air Quality Standards
NO_x	Nitrous Oxide
NO_2	Nitrogen Dioxide
O_3	Ozone
Pb	lead
$PM_{2.5}$	particulate matter of 2.5 micrometers or smaller
PM_{10}	particulate matter of 10 micrometers or smaller
POV	Privately-owned Vehicle
RHC	Raul Hector Castro
ROD	Record of Decision
SEIS	Supplemental Environmental Impact Statement
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
U.S.	United States
USEPA	U.S. Environmental Protection Agency
VOC	Volatile Organic Compound

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 Action is subject to the federal GCR. The United States (U.S.) General Services Administration's (GSA) 2024 *Final Environmental Impact Statement for the Expansion and Modernization of the Raul Hector Castro Land Port of Entry and Proposed Commercial Land Port of Entry* (herein referred to as the 2024 Final Environmental Impact Statement [EIS]) evaluated multiple alternatives for the expansion and modernization of the land port of entry (LPOE) facility. GSA signed a Record of Decision (ROD) for the 2024 Final EIS on May 14, 2024. In the ROD, GSA selected the preferred alternative, identified as Alternative 2 (Concurrent Construction – Westward Expansion), herein referred to as the 2024 Final EIS preferred alternative, which would involve construction of a new Commercial LPOE and phased expansion and modernization of the existing Raul Hector Castro (RHC) LPOE at the same time, with expansion primarily to the west of the existing RHC LPOE.

This Supplemental Environmental Impact Statement (SEIS) focuses on specific, newly identified components of the overall project: the realignment of a segment of the Rose Avenue channel, construction of a new stormwater basin, and utility upgrades. Under the Proposed Action, a segment of the existing stormwater channel segment would be realigned from directly west of the existing RHC LPOE to run parallel to Border Road before discharging to an unnamed wash west of Chino Road, a new stormwater basin would be constructed to improve stormwater management capabilities for the expanded and modernized RHC LPOE, and utilities would be replaced or installed in the vicinity of the RHC LPOE Expansion and Modernization Project Area. GSA evaluated one action alternative for the Proposed Action, Alternative 1 – Flood Control and Utility Upgrades. The Proposed Action 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_2), carbon monoxide (CO), particulate matter of 10 micrometers or smaller (PM_{10}), particulate matter of 2.5 micrometers or smaller ($PM_{2.5}$), and sulfur dioxide (SO_2) were calculated. These calculations demonstrate that the emissions resulting from the Proposed Action 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 Action.

C.2 GENERAL CONFORMITY RULE APPLICABILITY ANALYSIS

The purpose of this analysis is to determine whether the Proposed Action is subject to the federal GCR established in 40 Code of Federal Regulations (CFR) Part 93, Determining Conformity of Federal Actions to State or Federal Implementation Plans. This analysis will determine whether the Proposed Action:

- Is 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;
- Is exempt or does 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
- Exceeds *de minimis* levels or is 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;

- Description of Alternatives (Section C.4) – A description of the Proposed Action and Alternatives;
- Methodology and Emissions Calculations (Section C.5) – Procedures and results for estimating emissions associated with the Proposed Action; and
- Conclusion (Section C.6) – Determination of whether the GCR is applicable to the Proposed Action.

C.3 BACKGROUND

As part of the implementation of the CAA Amendments, the U.S. Environmental Protection Agency (USEPA) issued National Ambient Air Quality Standards (NAAQS) for six criteria air pollutants: CO, SO_2, particulate matter (PM_{10} and $PM_{2.5}$), ozone (O_3), NO_2, 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 CAA 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 project area of the Proposed Action is 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_{10}. In addition, the Paul Spur/Douglas Planning Area has been designated a maintenance area for SO_2 (USEPA 2024a). The Arizona SIP 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 2024a). ADEQ is developing a nonattainment 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_{10} controls (ADEQ 2024b).

Because the Proposed Action is located within a *nonattainment* area for PM_{10} and a maintenance area for SO_2, 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, $PM_{2.5}$, and nitrous oxides (NO_x) emissions were also calculated. Note that ozone is a secondary pollutant that is not emitted directly but is created when NO_2 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, 40 CFR 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). 40 CFR 51.853(i) 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 the Proposed Action

Criteria Pollutant	CAA Designation for the Project Area	*De Minimis* Emission Rate (tons/year)
CO	Attainment	100
NO_2	Attainment	100
O_3	Attainment	100
SO_2	Maintenance	100
PM_{10}	Nonattainment (moderate)	100
$PM_{2.5}$	Attainment	70

Source: USEPA 2024a; USEPA 2024b
CO = carbon dioxide; NO_2 = nitrogen dioxide; O_3 = ozone; $PM_{2.5}$ = particulate matter of 2.5 micrometers or smaller; PM_{10} = particulate matter of 10 microns or smaller; SO_2 = sulfur dioxide

C.4 DESCRIPTION OF ALTERNATIVES

Alternative 1 – Flood Control and Utility Upgrades

For the purposes of this SEIS, GSA is evaluating one action alternative to the Proposed Action (i.e., Alternative 1) and the No Action Alternative. Under Alternative 1, GSA proposes to construct flood controls and utility upgrades in the vicinity of the RHC LPOE that were not included in the 2024 Final EIS. This alternative would support and interconnect with design elements from 2024 Final EIS preferred alternative. The key components of Alternative 1 include:

- Construct an approximately 2,750-foot-long stormwater channel that is anticipated to be a primarily a riprap-lined open channel along the entire route. A small, approximately 50-foot segment of the stormwater channel where it meets Border Road would be concrete-lined to facilitate vehicle access. GSA is also considering construction of the entire proposed channel segment as an open, concrete-lined channel, although the riprap-lined open channel design is the current preference. The proposed stormwater channel would originate at an extended concrete box culvert (CBC) located beneath the existing POV lanes south of the RHC LPOE inspection area and generally travel west, north of Border Road, and terminate at the unnamed wash west of Chino Road. Water flowing out of this proposed channel would proceed south along the unnamed wash across the U.S. – Mexico border as it does under existing conditions. The proposed alignment of the channel segment would avoid, as much as possible, existing utility components such as utility poles, sewer manholes, utility vault, the Border Road and sewer mains.
- Evaluate and improve the existing CBC beneath the LPOE. A portion of the existing CBC may be maintained in place.
- Extend the existing CBC to the west and terminate it immediately west of the planned repatriation drop off location at the southern end of the expanded and modernized LPOE. Demolition of existing structures would be limited to only a portion of the existing CBC that needs to be removed.
- Demolish the existing stormwater channel segment that parallels the western side of Pan American Avenue between East 3rd Street and the southern end of the existing RHC LPOE. The upstream end of the existing channel would then be transitioned to the surrounding adjacent grade and rock riprap would be placed on the exposed surface. Alternatively, the existing stormwater channel segment may be reused as conduit or other purposes during the expansion and modernization of the RHC LPOE.

- Install a new CBC where the proposed stormwater channel crosses Chino Road. This would also include repairing the portions of Chino Road that are impacted by improving the CBC in that area, and may require lowering a segment of an existing 8-inch water line that is located in close proximity to this CBC. A portion of Chino Road south of East 3rd Street may have to be partially or completely closed during construction of the CBC.
- As necessary, construct a maintenance road on either the north or south side of the proposed stormwater channel for maintenance access. This could also include a crossing or bridge over the proposed stormwater channel, as well as installation of guard rails as needed.
- Potentially construct security fencing on the north side of the proposed stormwater channel.
- Construct a new approximately 6.2-acre stormwater basin between the RHC LPOE and Chino Road and north of the proposed stormwater channel. The stormwater basin would be designed for temporary water storage with a 36-hour drain time, in compliance with City regulations, rather than a retention basin for permanent water storage.
- Obtain all necessary land and right-of-way permissions as applicable for the realigned stormwater channel segment and new stormwater basin. This could include acquiring, obtaining easements, or obtaining similar land use agreements on portions of land within a proposed additional expansion area totaling approximately 24 acres currently owned by the City of Douglas and a private landowner. This may also include a new right-of-way grant from the Bureau of Land Management (BLM) if any portions of Border Road are required for construction.
- Replace or install approximately 6,500 feet of electrical lines, 4,700 feet of sanitary sewer line, and 1,400 feet of fiber optic lines in the vicinity of the RHC LPOE:
    - West of Pan American Avenue, existing aboveground electrical lines would be removed and re-routed to tie into existing service lines. The exact route of the electrical line west of Pan American Avenue is not known at this time and would be determined during design; however, the alignment would occur within some section of the potential disturbance area for electrical utilities identified in Figure 2-1 in the SEIS. Newly installed electrical lines may consist of either aboveground pole-mounted lines, buried lines, or a combination of both. Burial of lines would require trenching. GSA has estimated that less than one acre of land would be disturbed during installation of this segment.
    - West of Pan American Avenue, an existing sanitary sewer line would need to be temporarily extended and realigned to Chino Road, south of 3rd Street so as to maintain service during construction and temporarily avoid conflicts with the realigned Rose Avenue channel segment construction footprint. This would include construction of a new manhole and establishing a new connection to an existing manhole at a sanitary sewer line east of Chino Road. Permanent sanitary sewer service for the expanded and modernized RHC LPOE is expected to tie into the existing alignment along East 3rd Street near the intersection with Pan American Avenue. At the western terminus of East 3rd Street with the intersection of Chino Road, the sanitary sewer line would need to be extended west towards the WWTP, due to engineering conflicts between the proposed stormwater channel and existing sanitary sewer line along the Chino Road alignment south of East 3rd Street. The exact alignment of the new sanitary sewer connection west of Chino Road is unknown but would occur somewhere within the potential disturbance area for wet utilities as shown in Figure 2-1 of the SEIS, and is expected to temporarily disturb no more than 4.4 acres. In the long term, it is expected that the existing sanitary sewer lateral within the Chino Road alignment south of East 3rd Street, as well as portions of the existing sanitary sewer lines within the project area west of the expanded and modernized RHC LPOE, would be abandoned or removed.

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

Stormwater would still flow through the segment of the unnamed wash from the existing discharge point and proposed new discharge point of the Rose Avenue channel as shown in Figure 2-1 of the SEIS from properties located to the north, northeast, and east; however, the amount of stormwater flowing through the wash in this segment would be reduced due to flow being diverted from the realigned Rose Avenue channel. GSA is in the process of conducting hydrology studies to investigate overall changes in flow through the existing and proposed stormwater channels as well as into the unnamed wash and will provide available updates in the Final SEIS.

The timeframe for agency coordination and construction is tentative and is subject to change. However, for the purpose of this SEIS, design and agency coordination for Alternative 1 is anticipated to take approximately one year to complete, and construction is anticipated to take approximately 6 months in total to complete. Construction of the utility upgrades (i.e., stormwater, electrical, sanitary sewer, and fiber optic) is expected to occur during the construction of the RHC LPOE Expansion and Modernization Project as considered in the 2024 Final EIS. Construction of the realigned Rose Avenue channel segment is expected to occur prior to construction of the RHC LPOE Expansion and Modernization Project as considered in the 2024 Final EIS. During construction of the realigned Rose Avenue channel segment, it is estimated there could be approximately 20 worker vehicles, 20 delivery vehicles for construction supplies, and 10 haul trucks per day to the project area for deliveries and waste removal. The number of workers and vehicle trips for construction of utility upgrades would be consistent with levels evaluated in the 2024 Final EIS. All construction and demolition waste would be disposed of and recycled at authorized facilities. GSA would implement appropriate traffic control measures and install signage on local roadways during construction to manage construction vehicle traffic.

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

C.5 METHODOLOGY AND EMISSIONS CALCULATIONS

USEPA has designated the Paul Spur/Douglas Planning Area as a nonattainment area for PM_{10}. In addition, the Paul Spur/Douglas Planning Area has been designated a maintenance area for SO_2 (USEPA 2024a, ADEQ 2024b). This applicability analysis developed estimates of potential emissions of PM_{10} and SO_2 from Alternative 1; for completeness, potential CO, NO_x, $PM_{2.5}$, and VOC emissions were also estimated. Emissions were estimated for construction activities that would occur within the project boundary.

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 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 construction emissions, 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 for and the number of operating days as well as the number of workers (i.e., 20 workers) and equipment deliveries (i.e., 20 vehicles) were derived from other, similar projects and in coordination with GSA. An estimate of haul trucks per day (i.e., 10 trucks) was derived based on a conservative estimate of excavated sediment that would be required. Table C-2 provides an overview of the non-road construction equipment that may be used and served as a basis for calculating air emissions for construction.

Table C-2. Construction Equipment for Alternative 1

Construction Phase	Equipment Type	Quantity
Demolition	Bulldozer	2
	Excavator	3
Site Preparation	Grader	1
Grading	Tractor/Loader/Backhoe	2
	Grader	1
	Excavator	2
	Scraper	2
Construction	Crane	1
	Tractors/Loaders/Backhoes	3
	Generator Set	1
	Cement and Mortar Mixer	1
	Roller	2
	Paving Equipment	2

Construction emissions were estimated for on-road and nonroad vehicles. The emissions from on-road vehicles such as 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-3 for the emission factors used in the analysis.

Table C-3. Nonroad and On-Road Emissions Factors

Source	Emission Factor Units	Pollutant					
		CO	NO_x	SO_2	PM_{10}	$PM_{2.5}$	VOC
Non-road Construction Equipment							
Construction equipment, gasoline	g/day/unit	795.0	7.44	0.019	6.21	5.72	0.035
Construction equipment, diesel	g/day/unit	160.0	300.0	0.507	23.1	22.4	–
On-road Vehicles							
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
CO = carbon dioxide; g = grams; NO_x = nitrogen oxides; $PM_{2.5}$ = particulate matter of 2.5 micrometers or smaller; PM_{10} = particulate matter of 10 micrometers or smaller; SO_2 = sulfur dioxide; VOC = volatile organic compounds

Additionally, it was assumed that workers would commute an approximate total of 20 miles each day, and each worker would be driving their own vehicle (i.e., no carpooling). Vendor and waste trucks were assumed to travel 50 miles per day. 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-4 presents estimated construction emissions under Alternative 1.

Table C-4. Construction Emissions Under Alternative 1 – Flood Control and Utility Upgrades

Source	Criteria Pollutant Emissions (tons)					
	CO	NO_x	PM_{10}	$PM_{2.5}$	SO_2	VOC
Construction Equipment	0.10	0.18	0.01	0.01	0.00	0.02
Worker Vehicles	0.19	0.01	0.00	0.00	0.00	0.01
Delivery and Waste Trucks	0.51	0.50	0.05	0.03	0.00	0.04
Fugitive Dust	––	––	2.30	1.23	––	––
Alternative 1 Total	**0.80**	**0.70**	**2.37**	**1.28**	**0.00**	**0.07**
2024 Final EIS – Preferred Alternative Total (worst case – 2026)	**9.47**	**5.01**	**41.91**	**22.50**	**0.03**	**0.67**
Total	**10.27**	**5.71**	**44.28**	**23.78**	**0.03**	**0.74**
De minimis Threshold (tons/year)	*100*	*100*	*100*	*70*	*100*	*10*

Source: USEPA 2024a, USEPA 2024b, GSA 2024
CO = carbon dioxide; NO_x = nitrogen oxides; $PM_{2.5}$ = particulate matter of 2.5 micrometers or smaller; PM_{10} = particulate matter of 10 micrometers or smaller; SO_2 = sulfur dioxide; VOC = volatile organic compounds

Operations

The emissions from operations of Alternative 1 would differ substantially from those described in the 2024 Final EIS for the Commercial LPOE and expanded and modernized RHC LPOE operations.

Unlike the LPOE expansion and modernization projects, the stormwater management facilities would not require an increase in permanent employees, nor would it affect vehicle wait times or traffic patterns. The project would not include buildings requiring heating systems or emergency generators, eliminating these sources of emissions entirely. Furthermore, the improved stormwater management could potentially lead to fewer flood events, which might indirectly reduce emissions associated with flood cleanup and repair activities. The primary sources of emissions during operation would likely be limited to occasional maintenance activities, such as the use of mowers or small vehicles for debris removal, and potential fugitive dust from dry portions of the channel or stormwater basin during windy conditions. These emissions sources are expected to be infrequent and produce negligible impacts on air quality compared to the LPOE operations analyzed in the 2024 Final EIS. Proper design and regular maintenance of the stormwater management facilities should further minimize the potential for fugitive dust emissions. Considering these factors, a detailed quantitative analysis of operational emissions for this stormwater infrastructure project is not warranted, as the emissions would be *de minimis* in comparison to the RHC LPOE Expansion and Modernization Project, and would not significantly impact regional air quality.

C.6 CONCLUSION

As shown in Table C-4 and the discussion throughout Section C.5, none of the criteria pollutant emissions estimated for Alternative 1 would exceed their respective *de minimis* thresholds. Therefore, the General Conformity Rule is not applicable to the Proposed Action.

C.7 REFERENCES

Argonne National Laboratory. 2013. Updated Emission Factors of Air Pollutants from Vehicle Operations in GREET using MOVES. Accessed December 3, 2024 at https://greet.es.anl.gov/files/vehicles-13.

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APPENDIX D – FLOODPLAIN ASSESSMENT AND STATEMENT OF FINDINGS

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ACRONYMS AND ABBREVIATIONS

CBC	Concrete box culvert
CBP	U.S. Customs and Border Protection
CFR	Code of Federal Regulations
CLOMR	Conditional Letter of Map Review
EIS	Environmental Impact Statement
EISA	Energy Independence and Security Act
EO	Executive Order
FEMA	Federal Emergency Management Agency
GSA	U.S. General Services Administration
LPOE	Land Port of Entry
NEPA	National Environmental Policy Act
PBS	Public Buildings Service
RHC	Raul Hector Castro
ROD	Record of Decision
SEIS	Supplement Environmental Impact Statement
U.S.	United States

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 the United States (U.S.) General Services Administration's (GSA's) *Floodplain Management Desk Guide, November 2023* (GSA 2023) (Companion to GSA Order PBS 1095.8A), 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. As required under EO 11988, GSA is following the *8-Step Decision-Making Process for Actions and Federally Funded Projects*, which includes the following steps: 1) determining the floodplain; 2) involving the public in the decision-making process; 3) identifying and evaluating practicable alternatives to locating in the floodplain; 4) assessing the floodplain impacts; 5) mitigating adverse impacts; 6) re-evaluating the alternatives; 7) announcing and explaining the decision to the public; and 8) implementing the Proposed Action.

If there is no practicable alternative to locating within the floodplain of concern, then as part of the 8-step decision-making process, GSA is required to provide justification for no practicable alternatives, evaluate the potential impacts on floodplains, and provide the public an opportunity to review and comment on a statement of findings.

GSA completed a *Final Environmental Impact Statement for the Expansion and Modernization of the Raul Hector Castro Land Port of Entry and Proposed Commercial Land Port of Entry in Douglas, Arizona* in April 2024 (herein referred to as the 2024 Final Environmental Impact Statement [EIS]). GSA signed a Record of Decision (ROD) for the 2024 Final EIS on May 14, 2024. In the ROD, GSA selected the preferred alternative, identified as Alternative 2 (Concurrent Construction – Westward Expansion), herein referred to as the 2024 Final EIS preferred alternative, which would involve construction of a new Commercial LPOE and phased expansion and modernization of the existing Raul Hector Castro (RHC) Land Port of Entry (LPOE) at the same time, with expansion primarily to the west of the existing RHC LPOE. GSA also approved sub-alternative 2d (combination of adaptive reuse, relocation, and demolition), identified as the preferred alternative for the management of historic structures at the RHC LPOE. As planning for this undertaking has continued, in Section 106 consultation with the State Historic Preservation Office and consulting parties, GSA has identified demolition of the historic Main Building and Garage as the preferred approach to the historic structures at the RHC LPOE. The 2024 Final EIS and GSA's signed ROD can be viewed on the GSA project website at: https://www.gsa.gov/about-us/gsa-regions/region-9-pacific-rim/land-ports-of-entry/raul-hector-castro-land-port-of-entry/environmental-review. The 2024 Final EIS included a floodplain assessment and statement of findings for the Proposed Action considered within that EIS in Appendix D.

During design of the RHC LPOE Expansion and Modernization Project, GSA determined that the existing Rose Avenue channel alignment, which runs through the 2024 Final EIS preferred alternative project area, could result in increased flood risk to the expanded and modernized RHC LPOE as well as additional engineering and construction costs. To address these issues, GSA is proposing a project that includes realigning a segment of the Rose Avenue channel (sometimes also referred to as the Rose Avenue Canal or International Canal) and extending and improving the existing concrete box culvert (CBC). GSA also determined that the necessary area to manage stormwater flows from the expanded and modernized RHC LPOE could not be accommodated within the project area originally considered in the 2024 Final EIS and that additional land area is required for stormwater management. To address this issue, GSA is considering constructing a new stormwater basin to the west of the RHC LPOE to accommodate stormwater flow from the proposed RHC LPOE. Lastly, GSA also determined that additional utility lines need to be replaced or installed that were not evaluated in the 2024 Final EIS. To address this issue, GSA is proposing to replace and install various utility lines (i.e., electrical, sanitary sewer, and fiber optic lines) in the vicinity of the RHC LPOE. The project also involves acquiring additional land or obtaining appropriate land use

agreements, as well as obtaining necessary permissions to implement these changes. As a result of these proposed changes to the 2024 Final EIS preferred alternative, GSA determined that supplemental analysis under the National Environmental Policy Act (NEPA) is required.

The *Supplemental 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*. evaluates the potential adverse impacts to floodplains (see Section 3.6 of the Supplement EIS [SEIS]). A review of Federal Emergency Management Agency (FEMA) mapping was conducted to determine that a portion of the Proposed Action project area would be within and/or encroach on floodplains. As such, GSA prepared this Floodplain Assessment and Statement of Findings as part of the 8-step decision-making process for floodplain compliance under EO 11988.

This document is also prepared as part of a NEPA review process for the project and incorporates analysis and results from the SEIS. This assessment is being included in the Draft SEIS and distributed to appropriate government agencies and other interested parties for review and comment.

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

The Proposed Action is defined as constructing flood control and utility upgrades in support of the RHC LPOE Expansion and Modernization Project. The Proposed Action would support and interconnect with design elements from the 2024 Final EIS preferred alternative as described above. The Proposed Action would include site preparation, including partial demolition of the existing stormwater channel segment (west of the existing site), and portion of the CBC within the 2024 Final EIS preferred alternative project area; potential land acquisition or establishment of applicable land use agreements in the vicinity of the Proposed Action; realignment of a segment of the Rose Avenue channel and associated stormwater channel system components; repair of CBC and road systems impacted by the Proposed Action; and other various utility or ancillary facilities constructed in support of the RHC LPOE Expansion and Modernization Project.

As part of the decision-making process, GSA evaluated one action alternative (Alternative 1 – Flood Control and Utility Upgrades) and the No Action Alternative in the Draft SEIS. Under Alternative 1, GSA proposes to construct flood control and utility updates in the vicinity of the RHC LPOE that were not included in the 2024 Final EIS (see Figure D-1). The proposed layout provided in Figure D-1 represents a preliminary concept site plan for development and is used as a basis for discussion and environmental analysis. Alternative 1 would consist of the following:

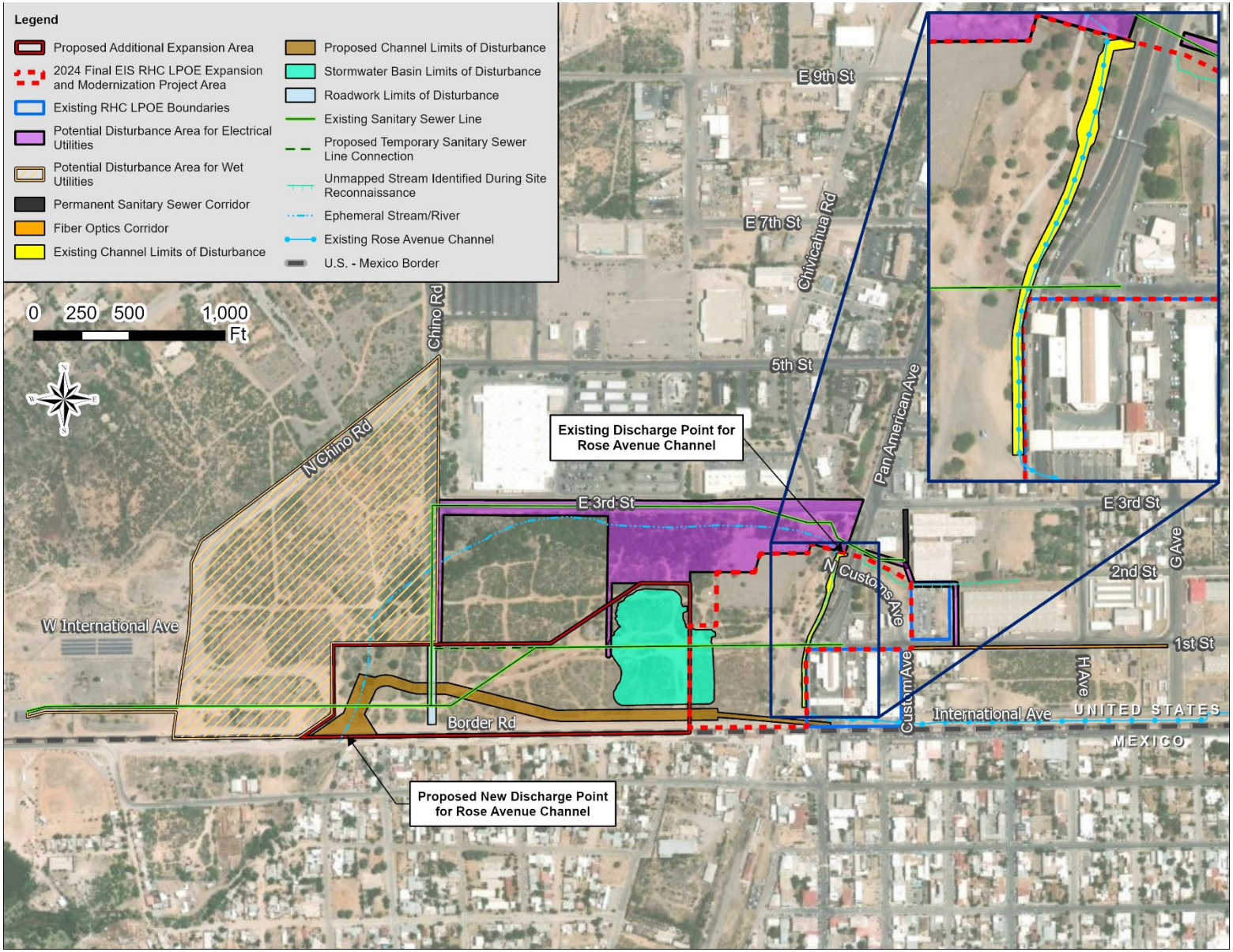

Figure D-1. Proposed Action Limits of Disturbance

- Construct an approximately 2,750-foot-long stormwater channel that is anticipated to be a primarily a riprap-lined open channel along the entire route. A small approximately 50-foot segment of the stormwater channel where it meets Border Road would be concrete-lined to facilitate vehicle access. GSA is also considering construction of the entire proposed channel segment as an open, concrete-lined channel, although the riprap-lined open channel design is the current preference. The proposed stormwater channel would originate at an extended CBC located beneath the existing POV lanes south of the RHC LPOE inspection area and generally travel west, north of Border Road, and terminate at the unnamed wash west of Chino Road at the U.S. – Mexico border. Water flowing out of this proposed channel would proceed south along the unnamed wash across the U.S. – Mexico border as it does under existing conditions. The proposed alignment of the channel segment would avoid, as much as possible, existing utility components such as utility poles, sewer manholes, utility vault, the Border Road and sewer mains.
- Evaluate and improve the existing CBC beneath the LPOE. A portion of the existing CBC may be maintained in place.
- Extend the existing CBC to the west and terminate it immediately west of the planned repatriation drop off location at the southern end of the expanded and modernized LPOE. Demolition of existing structures would be limited to only a portion of the existing CBC that needs to be removed.
- Demolish the existing stormwater channel segment that parallels the western side of Pan American Avenue between East 3rd Street and the southern end of the existing RHC LPOE. The upstream end of the existing channel would then be transitioned to the surrounding adjacent grade and rock riprap would be placed on the exposed surface. Alternatively, the existing stormwater channel segment may be reused as conduit or other purposes during the expansion and modernization of the RHC LPOE.
- Install a new CBC where the proposed stormwater channel crosses Chino Road. This would also include repairing the portions of Chino Road that are impacted by improving the CBC in that area, and may require lowering a segment of an existing 8-inch water line that is located in close proximity to this CBC. A portion of Chino Road south of East 3rd Street may have to be partially or completely closed during construction of the CBC.
- As necessary, construct a maintenance road on either the north or south side of the proposed stormwater channel for maintenance access. This could also include a crossing or bridge over the proposed stormwater channel, as well as installation of guard rails as needed.
- Potentially construct security fencing on the north side of the proposed stormwater channel.
- Construct a new approximately 6.2-acre stormwater basin between the RHC LPOE and Chino Road and north of the proposed stormwater channel. The stormwater basin would be designed for temporary water storage with a 36-hour drain time, in compliance with City regulations, rather than a retention basin for permanent water storage.
- Obtain all necessary land and right-of-way permissions as applicable for the realigned stormwater channel segment and new stormwater basin. This could include acquiring, obtaining easements, or obtaining similar land use agreements on portions of land within a proposed additional expansion area totaling approximately 24 acres currently owned by the City of Douglas and a private landowner. This may also include a new right-of-way grant from the Bureau of Land Management if any portions of Border Road are required for construction.
- Replace or install approximately 6,500 feet of electrical lines, 4,700 feet of sanitary sewer line, and 1,400 feet of fiber optic lines in the vicinity of the RHC LPOE:
    - West of Pan American Avenue, existing aboveground electrical lines would be removed and re-routed to tie into existing service lines. The exact route of the electrical line west of

Pan American Avenue is not known at this time and would be determined during design; however, the alignment would occur within some section of the potential disturbance area for electrical utilities identified in Figure D-1. Newly installed electrical lines may consist of either aboveground pole-mounted lines, buried lines, or a combination of both. Burial of lines would require trenching. GSA has estimated that less than one acre of land would be disturbed during installation of this segment.

- West of Pan American Avenue, an existing sanitary sewer line would need to be temporarily extended and realigned to Chino Road, south of East 3rd Street so as to maintain service during construction and temporarily avoid conflicts with the realigned Rose Avenue channel segment construction footprint. This would include construction of a new manhole and establishing a new connection to an existing manhole at a sanitary sewer line east of Chino Road. Permanent sanitary sewer service for the expanded and modernized RHC LPOE is expected to tie into the existing alignment along East 3rd Street near the intersection with Pan American Avenue. At the western terminus of East 3rd Street with the intersection of Chino Road, the sanitary sewer line would need to be extended west towards the wastewater treatment plant (WWTP), due to engineering conflicts between the proposed stormwater channel and existing sanitary sewer line along the Chino Road alignment south of East 3rd Street. The exact alignment of the new sanitary sewer connection west of Chino Road is unknown but would occur somewhere within the potential disturbance area for wet utilities as shown in Figure D-1, and is expected to temporarily disturb no more than 4.4 acres. In the long term, it is expected the existing sanitary sewer lateral within the Chino Road alignment south of East 3rd Street, as well as portions of the existing sanitary sewer lines within the project area west of the expanded and modernized RHC LPOE, would be abandoned or removed.
- East of Pan American Avenue, electrical, sanitary sewer, and fiber optic lines would be installed around the 2024 Final EIS preferred alternative project area. Similar to utility work occurring west of Pan American Avenue, newly installed electrical lines may consist of either aboveground pole-mounted lines, buried lines, or a combination of both. Burial of lines would require trenching. Electrical lines would be installed in a combination of overhead and underground lines; sanitary sewer and fiber optic lines are anticipated to require trenching. Sanitary sewer line work would be conducted in conjunction with abandonment of the existing line west of Pan American Avenue.
- All construction work for these proposed utility lines would be conducted within existing or newly established rights-of-way (estimated at approximately 25 feet wide for electrical and sanitary sewer and approximately 15 feet wide for fiber optics) and would connect to utility lines owned and operated by the City of Douglas or local utility providers. No additional land acquisition would be required for the replacement and installation of these utility lines beyond what is already being considered for the realigned stormwater channel segment and new stormwater basin. GSA would obtain all necessary land use and right-of-way permissions, as required. Electrical work may ultimately be conducted by the local utility provider rather than GSA.

Stormwater would still flow through the segment of the unnamed wash from the existing discharge point and proposed new discharge point of the Rose Avenue channel as shown in Figure D-1 from properties located to the north, northeast, and east; however, the amount of stormwater flowing through the wash in this segment would be reduced due to flow being diverted from the realigned Rose Avenue channel. GSA is in the process of conducting hydrology studies to investigate overall changes in flow through the existing and proposed stormwater channels as well as into the unnamed wash and will provide available updates in the Final SEIS.

The timeframe for agency coordination and construction is tentative and is subject to change. However, for the purpose of the SEIS, design and agency coordination for Alternative 1 is anticipated to take approximately one year to complete, and construction is anticipated to take approximately 6 months in total to complete. Construction of the utility upgrades (i.e., stormwater, electrical, sanitary sewer, and fiber optic) is expected to occur during the construction of the RHC LPOE Expansion and Modernization Project as considered in the 2024 Final EIS. Construction of the realigned Rose Avenue channel segment is expected to occur prior to construction of the RHC LPOE Expansion and Modernization Project as considered in the 2024 Final EIS. During construction of the realigned Rose Avenue channel segment, it is estimated there could be approximately 20 worker vehicles, 20 delivery vehicles for construction supplies, and 10 haul trucks per day to the project area for deliveries and waste removal. The number of workers and vehicle trips for construction of utility upgrades would be consistent with levels evaluated in the 2024 Final EIS. All construction and demolition waste would be disposed of and recycled at authorized facilities. GSA would implement appropriate traffic control measures and install signage on local roadways during construction to manage construction vehicle traffic.

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

The purpose of this project considered within this supplemental analysis is to address overall flood control and utility requirements (i.e., stormwater, electrical, sanitary sewer, and fiber optic), as well as improve port operational efficiency for the RHC LPOE Expansion and Modernization Project. The project is needed to avoid engineering conflicts between the current alignment of the Rose Avenue channel with the current proposed layout for the expanded and modernized RHC LPOE; to divert stormwater away from and reduce flooding risks at the RHC LPOE; to provide sufficient stormwater capacity for the expanded and modernized RHC LPOE; and to enhance overall functionality and safety. In addition, the project is needed to meet proposed utility requirements of the expanded and modernized RHC LPOE and bring them in line with current land port design standards and operational requirements. Existing electrical lines are also located within the area proposed for realignment of a segment of the Rose Avenue channel and that power the city's WWTP, located west of the existing RHC LPOE. These lines need to be relocated to maintain electrical service to the WWTP as well as to satisfy CBP design requirements, which prohibit overhead lines within LPOE boundaries.

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. As described in Appendix D of the 2024 Final EIS, the 2024 Final EIS preferred alternative qualifies 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). A critical action determination letter is provided in Section D.7 of Appendix D in the 2024 Final EIS. The Proposed Action under consideration is an extension to the 2024 Final EIS preferred alternative and as noted would integrate with that action as described above.

D.3 DESCRIPTION OF FLOODPLAIN

Figure D-2 illustrates the primary hydrologic features in the vicinity of the project area. An unnamed intermittent wash is located to the north and along the western and eastern edges of the project area (see Figure D-3). Approximately 2,400 linear feet of this unnamed wash crosses the project area. The unnamed wash originates just east of Pan American Avenue near East 3rd Street, flows east-west just south of East 3rd Street and then turns south before crossing the border into Mexico and draining into the Whitewater Draw.

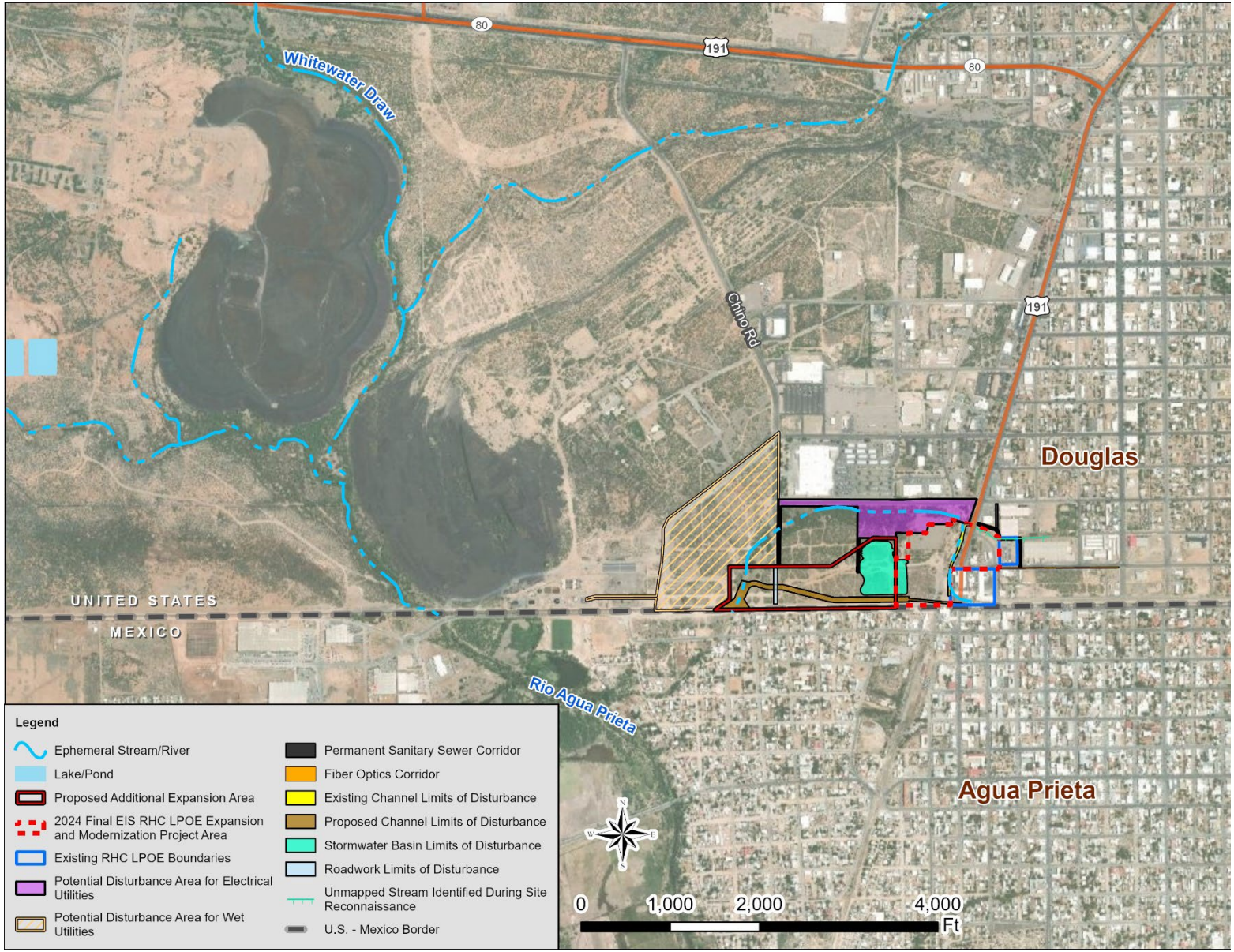

Figure D-2. Hydrologic Features in the Vicinity of the Project Area

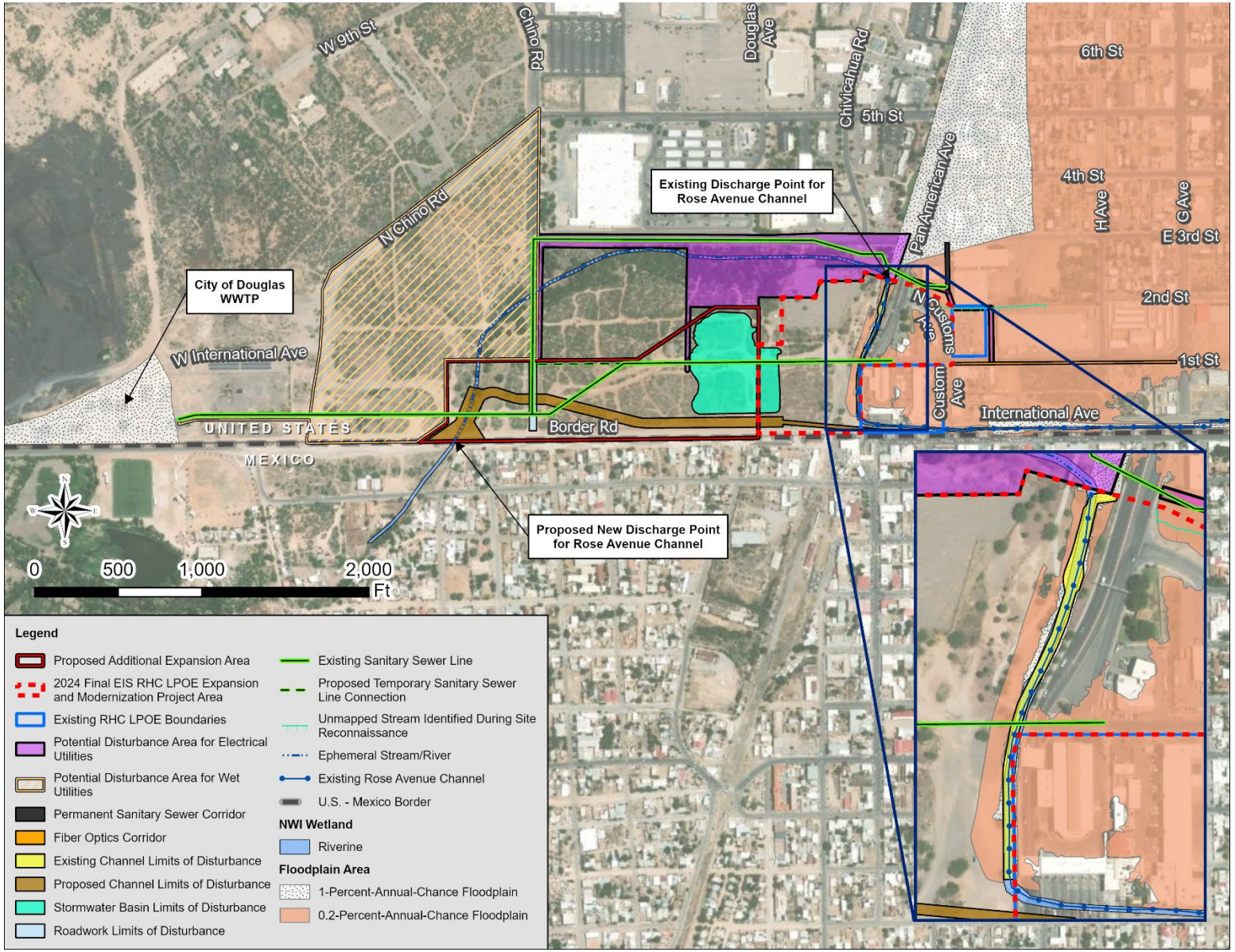

Figure D-3. Water Resources Near the Project Area

Currently, stormwater runoff from the existing RHC LPOE drains to this unnamed wash via drain inlets that discharge into the Rose Avenue channel. A segment of the existing Rose Avenue channel runs through the 2024 Final EIS preferred alternative project area (as described in Section 2.2 of the 2024 Final EIS), parallel to Pan American Avenue directly west of the RHC LPOE. The Rose Avenue channel currently discharges into this unnamed wash just south of the intersection of East 3rd Street and Pan American Avenue.

The existing stormwater channel proposed for demolition, portions of the proposed utility upgrades, the existing RHC LPOE, and much of the City of Douglas are located within a low point of a regional drainage field and are within Special Hazard Flood Areas designated as 1-percent-annual-chance (100-year floodplain) or 0.2-percent-annual-chance floodplains (500-year floodplain) (FEMA map number 04003C2883G) (FEMA 2016). The existing stormwater channel segment proposed for demolition contains 0.44 acre of 1-percent-annual-chance and 0.02 acre of 0.2-percent-annual-chance floodplains (see Figure D-3). Potential disturbance to this area was considered in the 2024 Final EIS, although specific demolition of the existing stormwater channel was not considered. Segments of the proposed utility upgrades (electrical, sanitary sewer, and fiber optics) on the eastern portion of the project area are located within the 1-percent-annual-chance and 0.2-percent-annual-chance floodplains (0.31 acres and 2.94 acres, respectively). The disturbance from the eastern segments of the proposed utility upgrade were also not evaluated in the 2024 Final EIS.

The stormwater channel segment is designated as a regulatory floodway, which 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" (FEMA 2020). Historically, areas near the project area along 1st Street and the entry to the Cargo Lot from Mexico have been particularly vulnerable to flooding (GSA 2019); however, a drainage correction project at the RHC LPOE was implemented within the last 5 years that improved flooding issues (Luttrell 2022). Flooding has remained an issue in the vicinity of the project area; there are known capacity issues with the unnamed wash's ability to handle existing stormwater flows from the existing Rose Avenue channel and other stormwater flows from the north and east. During high flow events, stormwater is known to overflow the unnamed wash and spread overland in the immediate area, causing ponding and muddy conditions in the adjacent areas, including the 2024 Final EIS preferred alternative project area and additional project area considered under this Proposed Action (GSA 2024). Flooding issues are also known to occur near where the unnamed wash crosses the U.S. – Mexico border, although this is due to flood gates within the border barrier infrastructure remaining closed during rain events. The remainder of the project area does not contain any 1-percent-annual chance or 0.2-percent-annual chance floodplains (FEMA map number 04003C2879F); however, a segment of the proposed sanitary sewer line upgrade would be located adjacent to a 1-percent-annual-chance floodplain area near the City of Douglas WWTP (see Figure D-3).

D.4 FLOODPLAIN IMPACTS

Alternative 1 would result in long-term, minor, beneficial, direct and indirect impacts to floodplains. The project area contains approximately 0.75 acre within the 1-percent-annual-chance floodplain and 2.96 acre within the 0.2-percent-annual-chance floodplain associated with the existing stormwater channel segment (i.e., the regulatory floodway) and segments of the proposed utility upgrades. The existing segment of the stormwater channel would be removed, and the Rose Avenue channel would be realigned to flow directly to the west rather than turning north before discharging into the unnamed wash, as shown in Figure D-3. This could result in the removal of existing Special Hazard Flood Areas associated with the existing stormwater channel segment to be removed, and the establishment of new Special Hazard Flood Areas associated with the proposed stormwater channel. GSA would evaluate the project during design to determine if the project would result in a change to the base-flood elevations or floodways and would prepare a Conditional Letter of Map Revision (CLOMR) for the City of Douglas and FEMA to review and approve, as applicable. Final design of the proposed realigned Rose Avenue channel segment and new stormwater basin would be conducted in accordance with GSA Interim Core Building Standards as well as

by the authority having jurisdiction and would consider local floodplain ordinance requirements as outlined in the City of Douglas's ordinance (*Section 15.20, Floodplain Management Plan*) (City of Douglas 2024). The proposed stormwater channel would be designed to accommodate the 1-percent-annual chance base flood but would consider the 0.2-percent-annual-chance base flood during design. Realignment of the segment of the Rose Avenue channel is expected to address capacity issues within the unnamed wash which receives discharge from the regulatory floodway, as well as points from the north and east, such that flooding issues in this area and at the RHC LPOE would be improved.

Therefore, realignment of the Rose Avenue channel segment is not anticipated to affect the floodplain's capacity to store water, or result in the potential to further expand the floodplain or increase the spread or intensity of a flood event.

Final design of the new stormwater basin would also incorporate standard measures, including those specified in the GSA Interim Core Building Standards as well as the authority having jurisdiction. This would reduce or manage stormwater flows and thus impacts to the floodplain and from flooding on the expanded and modernized RHC LPOE as well as surrounding buildings. In accordance with Section 438 of the Energy Independence and Security Act (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.

Construction associated with electrical, sanitary sewer, and fiber optic line upgrades would consist of either buried utility lines or, for electrical, aboveground pole-mounted lines within existing or newly established rights-of-way. Buried utilities would not decrease flood storage capacity or otherwise increase flood risk; aboveground electrical lines would only result in negligible adverse impacts to the floodplain which would be expected to be offset by the other flood control and stormwater management improvements associated with the project.

Operations of Alternative 1 would result in long-term, minor, beneficial, and direct impacts as a result of altered hydrology in the segment of the unnamed wash north of the project area between the existing and proposed discharge location (see Figure D-3) due to diversion of stormwater flows. As previously discussed, realignment of the Rose Avenue channel segment is expected to address capacity issues within the unnamed wash which receives discharge from the regulatory floodway, as well as points from the north and east, such that flooding issues in this area and at the RHC LPOE would be improved. Diversion of flow would reduce some, although not all of the periodic flow into this segment of the unnamed wash, as flow would continue to periodically discharge into the wash segment from stormwater channels from the north and east following rain events. During a 100-year storm event, approximately 600 cubic feet per second would be conveyed in the realigned Rose Avenue channel segment; during the 500-year storm event, approximately 789 cubic feet per second would be conveyed in the realigned Rose Avenue channel segment. These flow amounts would also represent the approximate decrease in flow through in the segment of the unnamed wash north of the project area between the existing and proposed discharge location. Further, realignment of the Rose Avenue channel segment could slightly reduce the intensity of flooding occurring where the unnamed wash crosses into Mexico as a result of closed flood gates along the border barrier infrastructure. This would be due to the diversion of existing stormwater contributing to a greater dissipation of flows throughout the wash and slightly reducing the potential for flooding in the surrounding area.

GSA is in the process of conducting hydrology studies to investigate overall changes in flow through the existing and proposed stormwater channels as well as into the unnamed wash, and will provide available updates in the Final SEIS. Further, GSA would coordinate with the International Boundary and Water Commission prior to construction, as necessary, regarding the extent of any diversion of stormwater flows.

Operations of Alternative 1 would also result in long-term, moderate, beneficial, and indirect impacts due to improved stormwater management within and near the project area. While Alternative 1 would result in

an increase of up to 4 acres of impervious surfaces if the realigned Rose Avenue channel is concrete-lined, the improved stormwater management facilities would divert stormwater away from and reduce flooding risks at the RHC LPOE, would provide additional stormwater management capacity for the expanded and modernized RHC LPOE, and would be designed to optimize stormwater flow and drainage in the project area. If the proposed channel segment is constructed with rock riprap, which may allow for greater infiltration of stormwater flows and runoff, the only surfaces consisting of impervious materials would be for the CBC stormwater features and a small, approximately 50-foot segment of the stormwater channel where it meets Border Road. This segment of the channel would be concrete-lined to facilitate vehicle access and would result in 0.4 acres of new impervious surfaces. While the demolition of the existing stormwater channel segment would remove approximately 0.5 acres of impervious surfaces; it is anticipated this area would be developed as part of the larger expansion and modernization of the RHC LPOE. The new stormwater basin or other utility upgrades would not create additional impervious surfaces.

There would be no additional subsurface disturbance activities required for operations, other than for occasional repair and maintenance activities. Negligible adverse impacts are expected from maintenance activities. The remainder of the project area is not located in the 1-percent-annual-chance or 0.2-percent-annual-chance floodplains.

D.5 CONCLUSIONS AND FINDINGS

As noted in the 2024 Final EIS, 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, as described further in the 2024 Final EIS:

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 of employees and users of the RHC LPOE; and
3) improving traffic congestion and safety for the City of Douglas.

For these conditions to be met, the expanded and modernized RHC LPOE must have sufficient stormwater management and flood control systems in place, such that allows for an efficient port design that facilitates CBP operations. In addition, the proposed utility upgrades (electrical, sanitary sewer, and fiber optics) would need to be installed to provide sufficient power, sanitary sewer, and communications service to the expanded and modernized RHC LPOE and to comply with existing CBP design requirements.

In addition to the alternative discussed in Section D.2, GSA considered realigning the Rose Avenue channel using an eastern alignment in the vicinity of the RHC LPOE in anticipation of future improvements to the existing RHC LPOE. The eastern alignment would start by connecting to the existing Rose Avenue channel near International Avenue, east of the existing RHC LPOE; proceeding north curving along North Customs Avenue; and terminating at an existing CBC on the eastern side of Pan American Avenue to go under the road allowing the water to flow into an unnamed wash. This alternative also considered improvements to the CBCs from International Avenue to the existing intersection of Customs Avenue and 1st Street as well at the CBC at Pan American Avenue. The proposed channel segment would have consisted of an open channel and be concrete-lined along the entire route. This alternative would also require demolition of the existing Special Hazard Flood Areas associated with the regulatory foodway located to the west of the existing RHC LPOE, and would have potentially established new Special Hazard Flood Areas associated with the realigned stormwater channel. This alternative was dismissed because of the additional engineering and costs required to move the stormwater to the north around the RHC LPOE prior to it flowing into the unnamed wash, physical conflicts with facilities within the expanded and modernized RHC LPOE, changes of traffic patterns required on Customs Avenue from a standard two-way street to a one-way street, and concerns over increased flow and water surface elevation at upstream areas where the channel crosses under Pan American Avenue. Further, the realigned stormwater channel segment would be substantially closer to

adjacent structures located to the east of the RHC LPOE. Therefore, this alternative was not carried forward for further analysis in the SEIS.

The No Action Alternative was also considered, under which GSA would not realign the Rose Avenue channel, construct a new stormwater basin, and would not replace or install electrical, sanitary sewer, fiber optic utility upgrades, or any other associated supporting facilities. The RHC LPOE Expansion and Modernization Project would be constructed as described in the 2024 Final EIS. The overall stormwater management and flood control needs for the expanded and modernized RHC LPOE would not be addressed; stormwater flow would not be diverted; electrical, sanitary sewer, and fiber optic requirements would not be met; and engineering conflicts between the current alignment of the Rose Avenue channel and the RHC LPOE Expansion and Modernization Project layout would remain. The No Action Alternative would also increase flood potential at the expanded and modernized RHC LPOE and surrounding area, increasing risks that the RHC LPOE could be partially shutdown or impacted during a storm event, impeding the LPOE's functionality, and jeopardizing the security and safety at the RHC LPOE. In addition, the utility requirements for the expanded and modernized RHC LPOE would not be met, lessening the port's operational efficiency and its ability to support the CBP mission. Although the No Action Alternative does not meet the purpose and need for the project, this alternative was carried forward to provide a baseline for comparison of effects from implementing Alternative 1.

After evaluating project design options and considering economic and market factors, GSA concluded that the Proposed Action is required to provide essential flood control and utility needs, as well as improve port operational efficiency at the expanded and modernized RHC LPOE. The Proposed Action is also necessary to avoid engineering conflicts between the current alignment of the Rose Avenue channel with the proposed layout for the expanded and modernized RHC LPOE; divert stormwater away from and reduce flooding risks at the RHC LPOE; provide sufficient stormwater capacity for the expanded and modernized RHC LPOE; and enhance overall functionality and safety of the RHC LPOE. In addition, the project is needed to meet proposed utility requirements of the expanded and modernized RHC LPOE and bring them in line with current land port design standards and operational requirements. Existing electrical lines are also located within the area proposed for realignment of a segment of the Rose Avenue channel and that power the city's WWTP, located west of the existing RHC LPOE. These lines need to be relocated to maintain electrical service to the WWTP as well as to satisfy CBP design requirements, which prohibit overhead lines within LPOE boundaries. Therefore, there is no practicable alternative to demolishing the existing stormwater channel segment (i.e., the regulatory floodway) located within the 1-percent-annual-chance and 0.2-percent-annual-chance floodplains or constructing utilities within these areas (see Figure D-3), or potentially establishing new Special Hazard Flood Areas, pending completion of the CLOMR and coordination with the City of Douglas and FEMA, as applicable.

In accordance with EO 11988, GSA is required to follow the 8-step decision-making process for floodplain management outlined in GSA's *Floodplain Management Desk Guide* (GSA 2023). As described in Section D.4, it is anticipated that the Proposed Action would not result in significant adverse impacts from the removal of existing Special Hazard Flood Areas that correspond with the regulatory floodway, or from any potential establishment of new Special Hazard Flood Areas. Long-term, minor, beneficial, direct and indirect impacts are anticipated from an improvement in stormwater management and flood control. GSA would incorporate applicable design and permitting requirements, including GSA Interim Core Building Standards as well as the authority having jurisdiction, city ordinances, and applicable federal regulations as described in Section D.4.

D.6 NOTICE OF FLOODPLAIN ACTION AND COMMENT PERIOD

In accordance with the 8-step floodplain decision-making process as outlined in GSA's floodplain desk guide, GSA provided this floodplain assessment as part of the Draft SEIS public review process and notified appropriate government agencies and other interested parties for review and comments via a Notice of Availability in the *Federal Register*, postings in the *Herald Review*, and letters sent to interested parties.

Comments received during the 45-day wait period for the Draft SEIS will be considered in preparation of the Final SEIS. The Draft SEIS is available electronically on the GSA project 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

D.7 REFERENCES

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