



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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BOSTON, MASSACHUSETTS 02114-2023

September 12, 2006

David M. Drevinsky P.E., PMP
Regional Environmental Quality Advocate (REQA)
U.S. General Services Administration
10 Causeway Street, Room 975
Boston, Massachusetts 02222

OFFICE OF THE
REGIONAL ADMINISTRATOR

Re: Draft Environmental Impact Statement New U. S. Border Station and Commercial Port of Entry, Derby Line, Vermont (CEQ #20060305)

Dear Mr. Drevinsky:

The Environmental Protection Agency-New England Region (EPA) has reviewed the General Services Administration's (GSA) Draft Environmental Impact Statement (DEIS) for the design and construction of a new U.S. Border Station and Commercial Port of Entry to replace the existing station located on Route I-91 in Derby Line, Vermont. We submit the following comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The DEIS describes the work necessary to construct a new U. S. Border Station and Commercial Port of Entry including the construction of a 22,053 s.f. main port building, space for current and future inspection lanes and booths (commercial and non-commercial), commercial and non-commercial secondary inspection buildings, a vehicle and cargo inspection system (VACIS) building, other associated buildings and site work.

The attachment to this letter highlights several suggestions regarding opportunities to reduce air pollution that we believe you should consider as you develop the Final Environmental Impact Statement (FEIS) for the proposed project. We appreciate the opportunity to comment on the DEIS for the new border station. Based on our review of the DEIS we have rated the DEIS "LO-1—Lack of Objections-Adequate" in accordance with EPA's national rating system, a description of which is attached to this letter. Please contact Timothy Timmermann (617-918-1025) of EPA's Office of Environmental Review with any comments or questions about this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth A. Higgins".

Elizabeth A. Higgins, Director
Office of Environmental Review

Attachment

617-918-1010

Internet Address (URL) • <http://www.epa.gov/region1>

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Summary of Rating Definitions and Follow-up Action

Environmental Impact of the Action

LO--Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC--Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO--Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU--Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1--Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

Additional Detailed Comments
New U. S. Border Station and Commercial Port of Entry
Draft Environmental Impact Statement
Derby Line, Vermont

Air Quality

Please consider adopting the following measures to reduce air pollution from the proposed project.

Anti-Idling Program

To address motor vehicle traffic that may queue at the Border Station and Commercial Port of Entry, EPA requests that the Bureau of Customs and Border Protection (CBP) investigate the feasibility of implementing an anti-idling program regardless of whether the Build or No-Build Alternative is selected. An anti-idling program could adopt the following policy:

- Vehicles awaiting customs inspection in designated queuing spaces/lines shall not allow, or permit the unnecessary operation (idling) of the engine of a motor vehicle while said vehicle is stopped for a foreseeable period of time in excess of five minutes. (Vehicles awaiting customs inspection, where idling of the primary propulsion engine is necessary to power work-related mechanical or electrical operations for reasons other than propulsion (e.g., mixing or processing cargo or refrigeration of cargo) and where substitute alternate power means cannot be made available, shall not be subject to the anti-idling policy).

Turning off both gasoline and diesel vehicles when the engine power is not required will reduce motor vehicle emissions of carbon monoxide, carbon dioxide, particulate matter, volatile organic compounds, oxides of nitrogen, and mobile source air toxics. These emissions can adversely affect local air quality, adversely affect human health through exposure, and can seep into nearby buildings and adversely affect indoor air quality.

Variable Message Signs

EPA encourages the General Services Administration and the Bureau of Customs and Border Protection to work closely with the Federal Highway Administration-Vermont Division and the Vermont Agency of Transportation to integrate variable message signs (ITS--Intelligent Transportation Systems) into the project design to provide motorists with important traffic and safety instructions/warnings related to reduced traffic speeds, traffic delays at the border facility, and queued or stopped vehicles. The system could also request that motorists tune to a local AM station for condition updates, provide notification of an anti-idling policy at the border station, and could provide other similar messages to alert motorists of traffic/safety conditions at the border facility.

Green Building Design

We were pleased to see that the proposed project will be designed to incorporate elements of sustainable design and that the project will be certified through the Leadership in Energy and Environmental Design (LEED) program (DEIS page 4-15).