



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

March 8, 2007

David M. Drevinsky P.E., PMP
U.S. General Services Administration
New England Region
Property Development Division (IPC)
10 Causeway Street, Room 975
Boston, Massachusetts 02222-1077

Re: Final Environmental Impact Statement Madawaska Border Station, Madawaska, Aroostook County, Maine (CEQ #20070029)

Dear Mr. Drevinsky:

The Environmental Protection Agency-New England Region (EPA) has reviewed the General Services Administration's (GSA) Final Environmental Impact Statement (FEIS) for the replacement of the existing Madawaska Border Station facility. The FEIS describes the work necessary to replace the existing border station with a new facility with adequate office space and room for expansion, adequate space for primary and secondary inspection, parking and delivery, and to meet increased security needs. During our review of the FEIS we also considered information contained in the attached February 5, 2007 letter to EPA from Gannett Fleming (GSA's EIS consultant)¹. We submit the following comments on the FEIS in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

EPA's comments on the DEIS encouraged the GSA to investigate and develop an anti-idling program at the new border station facility to reduce motor vehicle emissions of carbon monoxide, carbon dioxide, particulate matter, volatile organic compounds, oxides of nitrogen, and mobile source air toxics. In response, the February 5, 2007 Gannett Fleming response indicates that the GSA will investigate the "need and feasibility" of an anti-idling program during the project's final design phase. While we appreciate GSA's commitment to further consider such a program we continue to encourage the GSA to undertake this investigation prior to the close of the NEPA process so that the benefits and tradeoffs of such a program can be included in the Record of Decision. Please let us know if we can be of any assistance as you conduct the analysis of such a program. EPA's comments on the DEIS also asked GSA to commit to design the project to incorporate elements of sustainable design and to certify the proposed buildings through the Leadership in Energy and Environmental Design (LEED) program. We applaud the GSA commitment to achieve the LEED silver certification rating for

¹ EPA wishes to correct/clarify portions of the text of the Gannett Fleming February 5, 2007 letter and February 2, 2007 Memorandum for the record. We note that our comments on the Madawaska Border Station DEIS were successfully transmitted to the GSA during the comment period on the DEIS via a fax transmission on September 21, 2006. EPA appreciates the efforts of the GSA to forward our comments after the publication of the FEIS (along with proposed responses to our comments) to those who commented on the DEIS.

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the new border crossing facility.

Thank you for the opportunity to comment on the FEIS for the new border station. Please contact Timothy Timmermann (617-918-1025) of EPA's Office of Environmental Review with any comments or questions about this letter.

Sincerely,

Robert W. Varney
Regional Administrator

Attachment



Gannett Fleming

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February 5, 2007

Mr. Tim Timmermann
U.S. Environmental Protection Agency Region 1
Office of Environmental Review
1 Congress Street, Suite 1100
Boston, MA 02114-2023

Re: FEIS CEQ # 20060316
Replacement of the Madawaska Border Station
Madawaska, Aroostook County, Maine

Dear Mr. Timmermann:

On behalf of the GSA, thank you for the letter dated September 21, 2006 providing comments on the DEIS. The GSA regrets not having received the letter providing comments on the DEIS prior to preparing and circulating the FEIS and distributed the comments to those that reviewed on commented on the DEIS, as suggested. In response to the two suggestions to develop a better project, the GSA offers the following:

Anti-Idling Program

The replacement of the existing border station will result in substantial improvements in the flow of cross border traffic, the length of vehicle queues, and reductions in gasoline and diesel vehicle emissions over the existing and future no-build conditions. With the project, as conceptually designed, there may not be a need to develop and implement an anti-idling program and / or policy. The GSA is committed to investigating the need and feasibility of implementing an anti-idling program, at this border station, during the final design phase of project development. Our considerations in evaluating an anti-idling program would include the need to develop such a program (based on the anticipated number of vehicles and length of traffic queues), the views of the CBP, climate, and overall practicality.

Green Building Design

The GSA is committed to achieving the LEED silver certification rating for the replacement facility (see FEIS page7).

The GSA appreciates your continued interest in the development of this important project.

Sincerely,

Gannett Fleming, Inc.

William M. Plumpton, CEP
Project Manager

WMP/

Pc: D. Drevinsky
F. Amey
File 046065

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MEMORANDUM

To: Those providing comments on the Draft Environmental Impact Statement
From: Gannett Fleming, Inc. on behalf of the U.S. General Services Administration
Date: February 2, 2007
Subject: Replacement of the Madawaska Border Station
Madawaska, Aroostook County, Maine

Be advised that the U.S. Environmental Protection Agency Region 1 reviewed the DEIS for the replacement of the Madawaska Border Station and provided a comment letter and their DEIS rating to the General Services Administration. This letter was not received by the General Services Administration prior to preparing and distributing the FEIS. Attached please find a copy of the U.S. Environmental Protection Agency's letter to the General Services Administration for your information and consideration.

In their comment letter, the U.S. EPA offered suggestions to further reduce motor vehicle emissions through development of an anti-idling program and encouraged the GSA to adopt green building design standards.

The GSA is committed to investigating the need and feasibility of implementing an anti-idling program, at this border station, during the final design phase of project development. The GSA's considerations in evaluating an anti-idling program would include the need to develop such a program (based on the anticipated number of vehicles and length of traffic queues), the views of the U.S Customs and Border Protection, climate, and overall practicality.

The GSA is committed to achieving the Leadership in Energy and Environmental Design (LEED) silver certification rating for the replacement facility (see FEIS page7).

If you have questions or for more information, please contact:

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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 BOSTON, MASSACHUSETTS 02114-2023

September 21, 2006

David M. Drevinsky P.E., PMP
 U.S. General Services Administration
 New England Region
 Property Development Division (IPC)
 10 Causeway Street, Room 975
 Boston, Massachusetts 02222-1077

OFFICE OF THE
 REGIONAL ADMINISTRATOR

Re: Draft Environmental Impact Statement Madawaska Border Station, Madawaska, Aroostook County, Maine (CEQ #20060316)

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 replacement of the existing Madawaska Border Station facility with a new border station to improve safety, security and functionality. We submit the following comments on the Draft Environmental Impact Statement (DEIS) 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 replace the existing border station in Madawaska with a new facility with adequate office space and room for expansion, adequate space for primary and secondary inspection, parking and delivery, and to meet increased security needs

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,

Elizabeth A. Higgins, Director
 Office of Environmental Review

Attachment

617-918-1010

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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
Draft Environmental Impact Statement
Madawaska, Maine**

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 facility, EPA requests that the Bureau of Customs and Border Protection (CBP) investigate the feasibility of implementing an anti-idling program at the new Madawaska Border Station. 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.

Green Building Design

We note that a recent GSA DEIS for the new U.S. Border Station and Commercial Port of Entry in Derby Line, Vermont included commitments to design the project to incorporate elements of sustainable design and to certify buildings through the Leadership in Energy and Environmental Design (LEED) program. We encourage GSA to adopt a similar approach for the Madawaska project.