



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

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CHICAGO, IL 60604-3590

FEB 22 2010

REPLY TO THE ATTENTION OF:

E-19J

Glenn Wittman
Regional Environmental Quality Advisor
Design & Construction Division
General Services Administration, Great Lakes Region
230 South Dearborn Street
Chicago, Illinois 60604-1696

Re: International Falls Land Port of Entry Improvements Study, Draft Environmental Impact Statement International Falls, Koochiching County, Minnesota. CEQ No.: 20100008

Dear Mr. Wittman:

In accordance with Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced U.S. General Services Administration (GSA) Draft Environmental Impact Statement (DEIS).

GSA proposes to expand and replace the existing 1.6 acres Land Port of Entry (LPOE) with a new LPOE facility that meets the needs of the U.S. Bureau of Customs and Border Protection (CBP), complies with GSA's design requirements, and provides safe and efficient inspection and processing of individuals, vehicles and freight at the border crossing between Fort Frances, Ontario, and International Falls, Minnesota.

The DEIS identifies and evaluates the No-Action and five action (build) alternatives (Alternatives 5, 7, 8, 9 and 10). All five action alternatives include the existing 1.6 acres LPOE site and range in size from 5.64 acres (Alternative 5) to 16.64 acres (Alternative 10). The action alternatives also vary in the number, type and layout of LPOE components (e.g., new main building, inspection lanes, parking lots, and access road). The DEIS-identified LPOE components for each alternative are depicted in site layout plans in DEIS Exhibits 2.3, 2.5, 2.7, 2.9 and 2.11. A preferred alternative is not identified. Based on our review of the DEIS, we rate all action alternatives "Environmental Concerns, Additional Information Needed" (EC-2). A summary of the rating system used in the evaluation of this document is enclosed. EPA's concern regards the potential for adverse impacts to water resources during project operation. Our specific concerns and recommendations follow.

The LPOE components of each build alternative will increase the impervious surface in the Rainy River watershed. Alternatives 7, 9 and 10 may result in direct impact to the Rainy River and its floodplain through the construction of piers to support a proposed access road. Storm water runoff from impervious surfaces, such the paved access road, and the inadvertent releases of hazardous

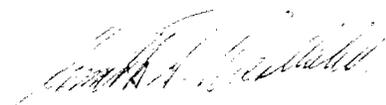
materials during project operation could adversely impact the water quality of the Rainy River and nearby wetlands. Road salt and vehicular fluids (such as motor oil, anti-freeze, and fuel) are among the constituents that could impact water quality. The DEIS contains little to no information regarding the proposed management and treatment of storm water run-off and inadvertent hazardous material releases during project operation. In addition, permanent storm water treatment components, such as detention basins, are not depicted in the build alternatives' site layout plans. To help insure that the water quality of the Rainy River and vegetated wetlands near the project area are not adversely impacted during project operation, EPA believes that additional information is needed.

Prior to identifying a preferred alternative, we recommend GSA assess each alternative's potential for providing adequate management and treatment of storm water run-off and hazardous materials that may be inadvertently released during project operation. If necessary, we recommend GSA consider modifying a build alternative's LPOE components and layout to accommodate adequate storm water and hazardous materials management and treatment components. The results of this assessment and proposed treatment methods should be discussed in the Final EIS and treatment components identified on the alternatives' site layout plans.

We are pleased to see that the proposed project will be designed to incorporate elements of sustainable design. The DEIS identifies that GSA is committed to achieving a Leadership in Energy and Environmental Design (LEED) Green Building Silver certification rating for the new LPOE at International Falls. In addition, we appreciate that GSA proposes to further reduce idling emissions and promote energy conservation and efficiency during operation of the LPOE, by promoting EPA's SmartWay Program through posting and distributing literature.

We look forward to reviewing the Final EIS (FEIS) for this proposal. If you have any questions, please contact Virginia Laszewski of my staff at (312) 886-7501 or at laszewski.virginia@epa.gov.

Sincerely,



Kenneth A. Westlake
Chief
NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Enclosure: Summary of Rating Definitions

cc: William Plumpton, Attention: GSA International Falls LPOE, Gannett Fleming, Inc.,
207 Senate Avenue, Camp Hill, PA 17011