ENVIRONMENTAL ASSESSMENT
U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT
EL PASO CITY ADMINISTRATIVE FACILITY
FORT BLISS, TEXAS

Prepared for:

Department of Homeland Security
U.S. Immigration and Customs Enforcement
Washington, DC

U.S. Army Corps of Engineers, Fort Worth District
Fort Worth, Texas

Prepared by:

U.S. Army
Directorate of Public Works
Environmental Division
Fort Bliss, Texas

October 2012

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EL PASO CITY ADMINISTRATIVE FACILITY
FORT BLISS, TEXAS

PREPARED FOR:

8·31·12

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Date

REVIEWED BY:

10 Sep 2012

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Date

APPROVED BY:

24 SEPT 12

Brant V. Dayley
Colonel, U.S. Army
Commanding

Date

FINAL FINDING OF NO SIGNIFICANT IMPACT

1.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

Proposed Action

The Proposed Action is for Fort Bliss to issue a renewable permit (i.e., a long-term lease) to U.S. Immigration and Customs Enforcement (ICE) and for ICE to construct, operate, and maintain one or more buildings totaling approximately 90,000 square feet on an approximately 19-acre site within Fort Bliss, Texas. This site fronts Montana Avenue and is located along the west side of the Armed Forces Reserve Center (AFRC). The proposed facility would house approximately 500 employees currently working in seven ICE facilities around El Paso, Texas. The leases on the seven facilities currently used by ICE would be terminated. Approximately 550 parking spaces would be constructed to accommodate visitors, employees, and government vehicles. Three stormwater detention basins would be constructed around the perimeter of the facility. Utilities would be connected to the facility from the existing utility corridor along Montana Avenue, and secure fiber-optic lines would be installed. A perimeter security fence with a minimum height of 8 feet and K-12 strength would be constructed around the facility, and appropriate lighting would be installed. Two secure vehicular access entrances would be built to provide ingress and egress for the new facility from Montana Avenue, and an acceleration/deceleration lane would be built along Montana Avenue to improve traffic flow and safety. The facility would operate 24 hours a day, 7 days a week, although most activity would be expected during weekday business hours.

No Action Alternative

The No Action Alternative would preclude the issuance of a renewable permit and the construction, operation, and maintenance of a new facility to house the existing ICE employees in the El Paso area. All seven currently occupied leased properties would continue to be maintained by ICE, and there would be no change in the location of El Paso area operations or facilities.

2.0 SUMMARY OF ENVIRONMENTAL RESOURCES AND IMPACTS

Implementation of the Proposed Action, with the incorporated design, construction, operation, and safety measures, would have minor direct, indirect, and cumulative impacts on land use, soils, biological resources, cultural resources, water resources, air quality, climate, noise, hazardous materials and waste, utilities, and health and safety on Fort Bliss and the surrounding area. There would be moderate impacts on transportation and traffic on Montana Avenue as a result of the 500 ICE employees commuting to the new facility. Traffic management strategies, such as the addition of U-turn lanes, a planned acceleration/deceleration lane, staggered shifts, and encouragement of commuting and public transportation use, would minimize the adverse impacts on Montana Avenue traffic. Further, a major cumulative long-term impact on the region would occur from the additional traffic expected as a result of development of areas along Montana Avenue. The additional vehicles from this development would further reduce the level of service on Montana Avenue; however, proposed mitigation strategies, including widening of Montana and the construction of overpasses at busy intersections by Texas Department of

Transportation (TxDOT), would be incorporated into future developments and would minimize those impacts.

3.0 CONCLUSION

Based on the analysis of the Proposed Action and the design, construction, operation, and safety measures presented in the EA, we conclude that the impacts of the Proposed Action will not significantly affect the human or natural environment of Fort Bliss or the surrounding area. We further conclude that the Proposed Action will impose no direct or indirect effects that cannot be mitigated or that could contribute to cumulative effects requiring preparation of an Environmental Impact Statement. Therefore a Finding of No Significant Impact (FNSI) is warranted.

David Roberts
Acting Director
DHS | ICE | OCFO
Office of Facilities Administration

11/29/2012
Date

Brant V. Dayley
Colonel, U.S. Army
Commanding

17 DEC 12
Date

EXECUTIVE SUMMARY

Proposed Action

The Proposed Action is for Fort Bliss to issue a renewable permit (i.e., a long-term lease) to Immigration and Customs Enforcement (ICE) and for ICE to construct, operate, and maintain one or more buildings totaling approximately 90,000 square feet on an approximately 19-acre site within Fort Bliss, Texas. The site fronts Montana Avenue and is located along the west side of the Armed Forces Reserve Center (AFRC). The proposed facility would house approximately 500 employees currently working in seven facilities around El Paso, Texas. The leases on the seven facilities currently used by ICE would be terminated.

The facility would be a design/build project that would qualify for Leadership in Energy and Environmental Design (LEED) certification at the Silver level. Approximately 550 parking spaces would be constructed to accommodate visitors, employees, and government vehicles. Three stormwater detention basins would be constructed around the perimeter of the site to control runoff. Water, sewer, and electric utilities would be connected to the facility from the existing utility corridor along Montana Avenue, and secure fiber-optic lines would be installed. A perimeter security fence with a minimum height of 8 feet and K-12 strength would be constructed around the facility, and appropriate lighting would be installed.

Two secure vehicular access entrances would be built to provide ingress and egress for the new facility from Montana Avenue. The site is set back 200 feet from Montana Avenue, providing the Texas Department of Transportation (TxDOT) space for road widening planned for the near future. An acceleration/deceleration lane would be built along Montana Avenue to improve traffic flow and safety.

The facility would be designed primarily to handle ICE administrative functions; however, there would also be short-term holding facilities for detainees. There would be a secure, controlled entrance for detainees, who would be processed and may be held up to 24 hours before being moved to longer-term detention facilities or deported. This short-term ICE detention facility would replace an existing ICE short-term detention facility currently in use in the El Paso area, and would not alter ICE operations in the area.

The facility would operate 24 hours a day, 7 days a week, although most activity would be expected during weekday business hours. ICE employees would work staggered 8.5-hour shifts, with approximately 100 to 125 employees arriving hourly between 6:00 a.m. and 9:00 a.m. Approximately 10 percent of employees would be expected to work nights or weekends.

No fueling, vehicle maintenance, or vehicle washing would be done on the site, and there would be no dog kennels. There would be no firing range and no communications tower or high structures. ICE would not be using training areas at Fort Bliss, and all ICE operations would be limited to the secure, fenced 19-acre parcel.

No Action Alternative

The No Action Alternative would preclude the issuance of a renewable permit and the construction, operation, and maintenance of a new facility to house the existing ICE employees in the El Paso area. All seven property leases would be maintained by ICE, and there would be no change in the location of El Paso area operations or facilities. The No Action Alternative does not meet the purpose and need for the proposed project but will be carried forward for analysis, as required by the Council on Environmental Quality (CEQ) regulations. The No Action Alternative describes the existing conditions in the absence of the Proposed Action.

Environmental Consequences

Implementation of the Proposed Action, with the incorporated design, construction, operation, and safety measures, would have minimal impacts on land use, soils, biological resources, cultural resources, water resources, air quality, climate, noise, hazardous materials and waste, utilities, and health and safety on Fort Bliss and the surrounding area. There would be moderate impacts on transportation and traffic on Montana Avenue as a result of the 500 ICE employees commuting to the new facility. Traffic management strategies, such as the addition of U-turn lanes, a planned acceleration/deceleration lane, staggered work shifts, and the encouragement of commuting, would minimize adverse impacts on traffic on Montana Avenue. Table ES-1 describes the potential effects of the Proposed Action.

A major cumulative long-term impact on the region would occur from the additional traffic expected as a result of development of areas along Montana Avenue. In addition to the proposed ICE facility, there would be a mixture of residential and commercial development. The additional vehicles from this development would further reduce the level of service on Montana Avenue and cause additional traffic delays during commute hours. However, proposed mitigation strategies incorporated into the project developments would minimize these impacts. There would be minor permanent cumulative impacts on land use and aesthetics, soils, and biological resources.

Table ES-1. Potential Impacts of the Proposed Action

Resource	No Action Alternative	Proposed Action
Land Use and Aesthetics	No impacts on land use or aesthetics would occur.	Approximately 19 acres of Fort Bliss land that is currently undeveloped and relatively undisturbed would be used for the ICE facility. An additional area of land measuring approximately 0.25 acre would be impacted by construction of the proposed acceleration/deceleration lane. However, the site is along the highly developed Montana Avenue corridor, and the proposed land use is consistent with land use and zoning in the area. The loss or degradation of this land is minimal in comparison to the amount of similar land available in the region and on Fort Bliss. Minimal impacts on land use and aesthetics would occur.
Soils	No impacts on soils would occur.	Approximately 19 acres of soils would be disturbed by the Proposed Action. Soils on an additional area of land measuring approximately 0.25 acre would be impacted by construction of the proposed acceleration/deceleration lane. Best Management Practices (BMPs) as described in a Stormwater Pollution Prevention Plan (SWPPP) would minimize soil loss during and after construction, so there would be minor impacts on soils.
Surface Water	No impacts on surface water would occur.	No impacts on surface water would occur, because no surface water is present in the area. Three detention basins would be constructed around the perimeter of the site to control stormwater runoff from at least a 100-year storm event. No stormwater would flow onto Montana Avenue from the proposed facility. Construction stormwater permitting would be obtained through the Texas Commission on Environmental Quality National Pollution Discharge Elimination System process as required under the Clean Water Act. A SWPPP would be developed and implemented to prevent stormwater runoff during and following construction.
Groundwater	No impacts on groundwater would occur.	There would be no activities associated with the proposed ICE facility that could threaten Hueco Bolson groundwater quality. With the relocation of employees from offices around the city to the proposed new location on Fort Bliss, no net increase in groundwater demand would be expected. Minor impacts on groundwater resources related to construction activities would occur due to water needed for construction and dust suppression.
Biological Resources	No impacts on biological resources would occur.	No Federally listed species would be affected. Potential impacts on biological resources as a result of the loss of vegetation and wildlife habitat would be considered long-term but minor because of the vast amounts of similar habitat and vegetation communities throughout Fort Bliss and the region. Some sensitive species such as Texas horned lizard (*Phrynosoma cornutum*), western burrowing owl (*Athene cunicularia*), and migratory birds protected under the Migratory Bird Treaty Act may be minimally impacted. To minimize impacts on migratory birds, the Texas horned lizard, and the western burrowing owl, all site preparation and utility installation would require either a preconstruction survey for nesting birds and lizard activity, and avoidance if discovered, or that the work be carried out in the fall and winter months to coincide with the non-breeding season for these species.
Cultural Resources	No impacts on cultural resources would occur.	No adverse impacts on cultural resources are anticipated. Any unanticipated subsurface cultural resources encountered during the construction of the proposed ICE facility would be properly mitigated under Fort Bliss supervision in accordance with the procedures set forth in the Programmatic Agreement between Fort Bliss and the Texas State Historic Preservation Officer.
Air Quality	No impacts on air quality would occur.	During construction, the Proposed Action would result in temporary, minor increases in vehicle emissions from worker commutes, equipment transfer and use, and fugitive dust emissions. Temporary dust emissions would be minimized through BMPs such as dust suppression methods. During construction, proper routine maintenance of all vehicles and other construction equipment would be implemented to ensure that emissions are within design standards of all construction equipment.
Climate	No impacts on climate would occur.	Construction-related air emissions of carbon dioxide (CO_2) and CO_2 equivalents would be temporary and minor. No permanent impacts on climate would occur, as there would be no net change in commute for workers.
Noise	No impacts on noise would occur.	Noise generated by the construction activities would be intermittent and last for approximately 1 year, after which noise levels would return to ambient levels. To minimize this impact, construction activities should be limited to daylight hours. Noise impacts would be minor if these timing restrictions are implemented during construction. Therefore, the noise impacts from construction activities would be considered negligible.
Traffic and Transportation	No impacts on traffic would occur.	There would be long-term, moderate adverse impacts on traffic and roadway wear and tear as a result of additional vehicle traffic on Montana Avenue. Additional traffic and large numbers of vehicles making U-turns would add traffic to already congested intersections. An acceleration/deceleration lane would be built along Montana Avenue to improve traffic flow and safety. Additional traffic management measures, such as U-turn lanes on Montana Avenue, could be added to minimize impacts, pending approval from TxDOT and the City of El Paso. Project construction activities would cause temporary, minor impacts on traffic and wear and tear on area roads.

Resource	No Action Alternative	Proposed Action
Health and Safety	No impacts on health and safety would occur.	During construction, all applicable Occupational Safety and Health Administration (OSHA) rules and regulations would be followed by project contractors. Heavy equipment operation areas and trenching locations would be secured to prevent inadvertent public access. Under the Proposed Action, health impacts would be minimal. Safety impacts would be minimal with OSHA rules and regulations and BMPs in place. Minor, long-term traffic safety impacts could result from vehicles turning into the facility, as well as vehicles merging into traffic as they exit the facility; however, a planned acceleration/deceleration lane along Montana Avenue would minimize the impacts.
Hazardous Materials and Waste	No impacts from hazardous materials would occur.	The potential adverse effects of hazardous materials would be minor and minimized through the implementation of BMPs. Construction of the Proposed Action would require machinery and the use of petroleum, oil, and lubricants (POL). Secondary containment would be used to capture POL. A limited amount of hazardous materials and waste would be used or generated during routine maintenance and operation of facilities and equipment. All hazardous and regulated wastes and substances generated during construction would be collected, characterized, labeled, stored, transported, and disposed of in accordance with all Federal, state, and local regulations, including proper waste manifesting procedures through the Fort Bliss Hazardous Waste Curbside service. Access for the Curbside service would be required as a design feature of the facility. Solid waste would be separated into appropriate containers and disposed of at a waste facility. Fort Bliss has a Spill Prevention, Control, and Countermeasures Plan (SPCCP) and Installation Spill Contingency Plan (ISCP) in place that would be followed during operations. Building materials used in the construction of the facility would be free of asbestos-containing materials and lead-based paint. All building materials used would be verified as asbestos-free based on the manufacturer's technical specification sheet or material safety data sheet.
Utilities Infrastructure	No impacts on utilities infrastructure would occur.	The Proposed Action would have negligible impacts on utilities infrastructure. The facility would obtain water, sewer, natural gas, and electric power services from city and private providers, as appropriate. These services are available along Montana Avenue. Secure fiber-optic lines would be obtained from a private contractor. Three stormwater detention basins are planned around the proposed administrative facility to capture runoff.
Socioeconomics	No impacts on population, housing, income, or employment would occur.	The Proposed Action would consolidate seven ICE offices around El Paso into one facility. This shift in office locations would have negligible temporary and permanent impacts on population, housing, income, and employment.
Environmental Justice	No environmental justice impacts would occur.	The Proposed Action would result in a transfer of employees from seven offices across the city into one facility. While El Paso County has a high minority and low-income population and Census Tract 103.22, which is immediately south of the proposed administrative facility, is high minority, neither construction activities nor shifting employees from the seven locations to one would be expected to result in disproportionate negative impacts on minority or low-income populations in the region or the area around the proposed facility. The implementation of the Proposed Action would not be expected to cause environmental health risks or safety risks that would disproportionately affect children.

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SECTION 1.0
PURPOSE AND NEED FOR THE PROPOSED ACTION

1.0 PURPOSE AND NEED FOR THE PROPOSED ACTION

1.1 Introduction

Fort Bliss Army Reservation is an active training facility located near El Paso, Texas, and covers areas in the extreme western part of Texas and south-central New Mexico. It consists of a cantonment area, Biggs Army Airfield (BAAF), and the Fort Bliss Training Complex (FBTC), which contains approximately 1.1 million acres and is used for training and maneuvers by the United States (U.S.) Army and other military units. The FBTC is generally separated into three operational regions: the South Training Areas in El Paso County, Texas; the Doña Ana Range-North Training Areas, in Doña Ana and Otero counties, New Mexico; and the McGregor Range, in Otero County, New Mexico (Figure 1-1).

The Department of Homeland Security (DHS) was formed following the terrorist attacks of September 11, 2001. Included among the agencies comprising the DHS is U.S. Immigration and Customs Enforcement (ICE). ICE is responsible for protecting National security and upholding public safety by targeting criminal networks and terrorist organizations that seek to exploit vulnerabilities in the Nation's immigration system and financial networks along the borders, at Federal facilities, and elsewhere. Strengthening the Nation's capacity to detain and remove criminal and other deportable aliens is a key component of ICE's strategy to deter illegal immigration and protect public safety. ICE maintains four operational divisions that will be involved in this facility, each comprising a number of law enforcement, intelligence, or mission support positions: Enforcement and Removal Operations (ERO), Homeland Security Investigations (HSI), Office of Principal Legal Advisors (OPLA), and Office of Chief Information Officer (OCIO).

The Proposed Action is for Fort Bliss to issue a renewable permit (i.e., a long-term lease) to ICE and for ICE to construct, operate, and maintain one or more buildings totaling approximately 90,000 square feet on an approximately 19-acre site within Fort Bliss in El Paso, Texas. The site fronts Montana Avenue and is located along the west side of the Armed Forces Reserve Center (AFRC) (Figure 1-2). The proposed facility would house approximately 500 employees currently working in seven facilities around El Paso. The leases on the seven facilities currently used by ICE would be terminated.

1.2 Purpose and Need

The purpose of the Proposed Action is to allow ICE to consolidate seven existing offices at a single location on Fort Bliss land to house all of ICE's El Paso area operations. The need for the project is to provide secure and easily accessible space for ICE agents, staff, and vehicles; reduce facility redundancy; eliminate seven separate building leases in the El Paso area for ICE operations; and increase operational effectiveness and cost-effectiveness. The consolidated facility would advance more efficient and effective ICE operations in the El Paso area and provide a modern functioning facility in response to added ICE responsibilities with protection of the U.S. border.

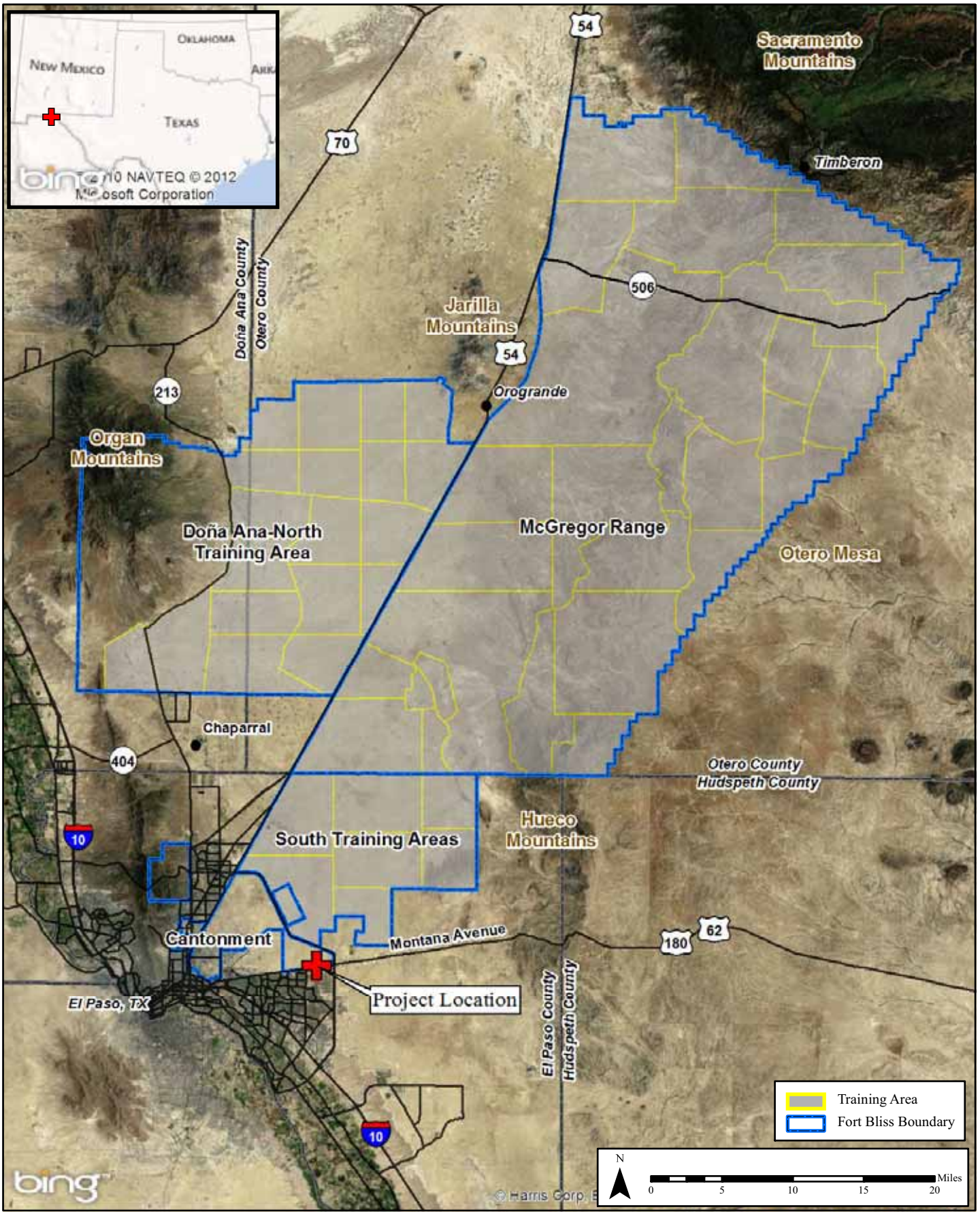

Figure 1-1. Fort Bliss Vicinity Map

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September 2012

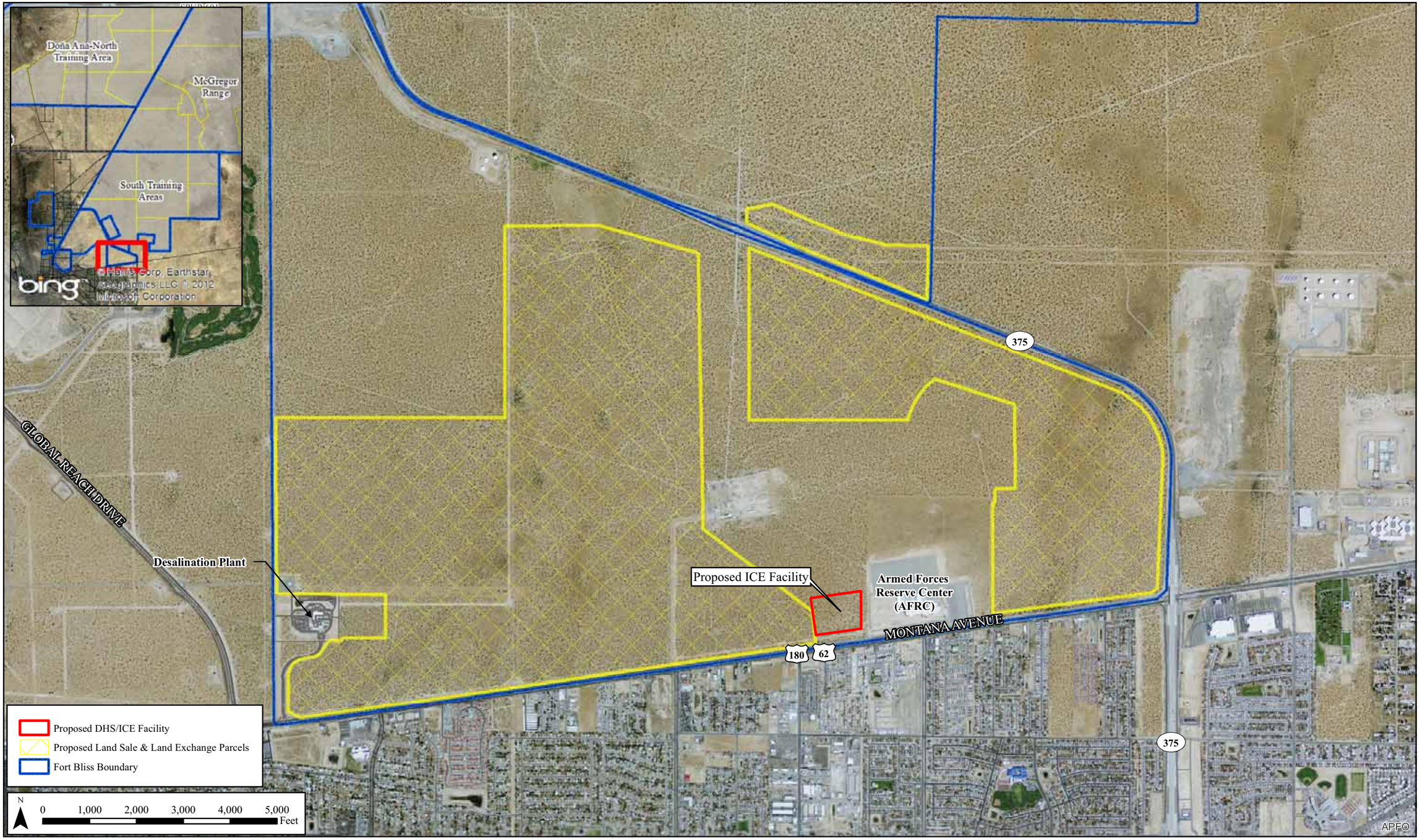

Figure 1-2. Location of Proposed ICE El Paso City Administrative Facility

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1.3 Scope and Content of the Analysis

The scope of the Environmental Assessment (EA) includes the analysis of effects resulting from the construction, operation, and maintenance of a new ICE administrative facility on Fort Bliss. Construction of the facility would include development of previously undisturbed lands on Fort Bliss. Closure of the seven leased offices in the El Paso area would result in the relocation of existing staff, equipment, and materials to the new location. The potentially affected natural and human environment would be limited to resources within the City of El Paso and El Paso County, Texas; however, most potential effects would be limited to the construction site and immediately adjacent resources.

The EA has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 U.S. Code [USC] 4321-4347), the Council on Environmental Quality (CEQ) regulations for implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1508), 32 CFR Part 651 – Environmental Analysis of Army Actions, and other pertinent environmental statutes, regulations, and compliance requirements.

1.4 Decision to Be Made

The U.S. Army, Fort Bliss, is responsible for the completion of the EA that will be used to guide the decision about whether to issue a permit to ICE for construction and operation of an administrative facility on Fort Bliss property. If no significant environmental impacts are determined based on the evaluation of impacts in the EA, a Finding of No Significant Impact (FNSI) will be signed by the Fort Bliss Garrison Commander and DHS ICE. If it is determined that the Proposed Action will have significant environmental impacts, the action will either not be undertaken, or a Notice of Intent will be published to inform the public that an Environmental Impact Statement (EIS) is being prepared.

1.5 Public Participation

Consultation and coordination with Federal, state, and local agencies was ongoing during preparation of the EA. Contacts made during the development of the action alternatives and preparation of the EA included:

- U.S. Fish and Wildlife Service (USFWS)
- U.S. Environmental Protection Agency (USEPA)
- Texas Commission on Environmental Quality (TCEQ)
- Texas Department of Transportation (TxDOT)
- Texas State Historic Preservation Officer (SHPO)
- Texas Parks and Wildlife Department (TPWD)
- Native American Tribes
- El Paso County, Texas
- City of El Paso

The U.S. Army invites public participation in the NEPA process to promote open communication and enable better decision making. The EA and draft FNSI were made available for public review for 30 days, and the Notice of Availability (NOA) was published in the *El Paso Times* and in Spanish in the *El Diario de El Paso* on September 30, 2012 (Appendix A). The EA and draft FNSI were also available electronically on Fort Bliss' website at www.bliss.army.mil (click on "Environmental") and at http://ecso.swf.usace.army.mil/Pages/Publicreview.cfm. The EA was distributed to local libraries and agencies, organizations, and individuals who had expressed interest in the project. The distribution list is included in Appendix A. Comments on the EA and draft FNSI were received from the TPWD. Their comments and the Army's responses are included in Appendix A. No other comments from agencies or the general public were received.

SECTION 2.0
DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

2.0 DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES

2.1 Proposed Action

The Proposed Action is for Fort Bliss to issue a renewable permit (i.e., a long-term lease) to ICE and for ICE to construct, operate, and maintain one or more buildings totaling approximately 90,000 square feet on an approximately 19-acre site within Fort Bliss in El Paso, Texas. This site fronts Montana Avenue just west of the AFRC (see Figure 1-2). The proposed facility would house approximately 500 employees currently working in seven facilities around El Paso. The leases on the seven facilities currently used by ICE would be terminated.

The facility would be a design/build project that would qualify for Leadership in Energy and Environmental Design (LEED) certification at the Silver level. Approximately 550 parking spaces would be constructed to accommodate visitors, employees, and government vehicles (Figure 2-1). Three detention basins would be constructed around the perimeter of the site to control stormwater runoff from at least a 100-year storm event. No stormwater would flow onto Montana Avenue from the proposed facility. Water, sewer, and electric utilities would be connected to the facility from the existing utility corridor along Montana Avenue, and secure fiber-optic lines would be installed. A perimeter security fence with a minimum height of 8 feet and K-12 strength would be constructed around the facility, and appropriate lighting would be installed.

Two secure vehicular access entrances would be built to provide ingress and egress for the new facility directly from Montana Avenue. The facility is set back 200 feet from Montana Avenue, providing the TxDOT space for road widening planned for the near future. An acceleration/deceleration lane would be built along Montana Avenue to improve traffic flow and safety. A final decision on ingress and egress designs would be determined during the design/build phase of the project. All designs would be reviewed by TxDOT and the City Traffic Engineer to assure that the facility would have the least impacts possible on Montana Avenue traffic levels of service (LOS).

The facility would be designed primarily to handle ICE administrative functions; however, there would also be short-term holding facilities for detainees. There would be a secure, controlled entrance for detainees, who would be processed and may be held up to 24 hours before being moved to longer-term detention facilities or deported. This short-term ICE detention facility would replace an existing ICE short-term detention facility currently in use in the El Paso area, and would not alter ICE operations in the area.

The ICE facility would operate 24 hours a day, 7 days a week, although most activity would be expected during weekday business hours. ICE employees would work staggered 8.5-hour shifts, with approximately 100 to 125 employees arriving hourly between 6:00 a.m. and 9:00 a.m. Approximately 10 percent of employees would be expected to work nights or weekends.

No fueling, vehicle maintenance, or vehicle washing would be done on the site, and there would be no dog kennels. There would be no firing range and no communications tower or high

structures. ICE would not be using training areas at Fort Bliss, and all ICE operations would be limited to the secure, fenced 19-acre parcel.

2.2 No Action Alternative

The No Action Alternative would preclude the construction, operation, and maintenance of a new facility to house the existing ICE employees in the El Paso area. All seven leased properties currently being used would continue to be maintained by ICE, and there would be no change in the location of El Paso area operations or facilities. The No Action Alternative does not meet the purpose and need for the proposed project but will be carried forward for analysis, as required by the CEQ regulations. The No Action Alternative describes the existing conditions in the absence of the Proposed Action.

2.3 Other Action Alternatives Considered

In assessing alternatives, ICE, through the General Services Administration (GSA), first evaluated options for acquiring a suitable building to lease in the El Paso area (i.e., approximately 90,000 square feet of building space, approximately 550 parking spaces, and meeting the secure facility access requirements of ICE). GSA did not find options for lease in the region that met ICE's facility criteria.

ICE contacted Fort Bliss regarding leasing an existing facility or new construction alternatives in the cantonment area at Fort Bliss. ICE and Fort Bliss staff evaluated potential sites for the proposed facility and determined that no sites in the cantonment area met ICE's security and access requirements, primarily because all ICE employees would have to travel through Fort Bliss' gated access before being able to reach the ICE facility.

Further evaluation of Fort Bliss land that met ICE's mission and need limited the evaluation of potential sites on Fort Bliss to land along Montana Avenue. The Fort Bliss land along Montana Avenue is the only area where secure access could be obtained for ICE without having to first travel through the Fort Bliss security gates. The only Fort Bliss property available along Montana Avenue that met ICE's size requirements was the parcel located west of the AFRC.

2.4 Summary

The No Action Alternative and Proposed Action have been carried forward for analysis. No other viable siting alternatives for the new El Paso area ICE facility were identified. The Proposed Action fully meets the project's purpose and need.

Figure 2-1. Conceptual Plan for ICE El Paso Administrative Facility

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SECTION 3.0
AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This section of the EA describes the natural and human environment that exists within the project area and the potential impacts of the Proposed Action and the No Action Alternative outlined in Section 2.0 of this document. Only those resources that have the potential to be affected by any of the alternatives considered are described, as per CEQ guidance (40 CFR 1501.7[3]). The effects from the Proposed Action include impacts from the construction, operation, and maintenance of an administrative facility for ICE in El Paso. The EA examines the potential for direct, indirect, adverse, or beneficial impacts. The EA also assesses whether such impacts are likely to be long-term, short-term, temporary, permanent, or cumulative.

A Table of Valued Environmental Components (VEC) (Table 3-1) was used to determine which resources would potentially be affected by the Proposed Action. VECs are those components that are considered to be important by society and potentially at risk from human activity or natural hazards. These include land use and aesthetics, soils, surface water, groundwater, biological resources, cultural resources, air quality, climate, noise, traffic and transportation, health and safety, hazardous materials and waste, utilities infrastructure, socioeconomics, and environmental justice.

Approximately 19 acres of land would be impacted by the proposed ICE facility, and the facility is set back 200 feet from Montana Avenue. An additional area of land measuring approximately 0.25 acre would be impacted by construction of the proposed acceleration/deceleration lane.

3.1 Land Use and Aesthetics

3.1.1 Affected Environment

Fort Bliss is located in the Chihuahuan Desert of western Texas and southern New Mexico. The installation consists of two major components, as described in the *Fort Bliss Texas and New Mexico Mission and Master Plan, Final Supplemental Programmatic Environmental Impact Statement* (SEIS) (U.S. Army 2007). The first is the main cantonment area within urban/suburban areas of the City of El Paso and adjacent communities. Urban and suburban areas have a mixture of residential, commercial, and industrial uses. The second is comprised of extensive open training areas. These areas are visible when traveling along roadways within Fort Bliss and surrounding areas and from overlooks at higher elevations.

The proposed ICE facility site is currently undeveloped. Areas to the east and south of the proposed ICE facility site are developed and are readily visible from Montana Avenue. Major development has occurred to the south of Montana Avenue in a corridor that includes residential, multi-family, retail, and large commercial developments. These developments have spread along the Texas Loop 375 corridor south to Interstate 10 (I-10) and along U.S. Highway 62/180 (Montana Avenue). In addition, parcels to the west and north of the proposed ICE facility are currently being considered for sale and a land exchange deal between Fort Bliss and the Texas General Land Office (TxGLO), respectively. Although these developments detract from the aesthetic and visual qualities of the desert landscape, this area has become an important commercial corridor in El Paso.

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Table 3-1. Summary of Valued Environmental Components Analysis

Resource	No Action Alternative	Proposed Action
Land Use and Aesthetics	No impacts on land use or aesthetics would occur.	Approximately 19 acres of Fort Bliss land that is currently undeveloped and relatively undisturbed would be used for the ICE facility. An additional area of land measuring approximately 0.25 acre would be impacted by construction of the proposed acceleration/deceleration lane. However, the site is along the highly developed Montana Avenue corridor, and the proposed land use is consistent with land use and zoning in the area. The loss or degradation of this land is minimal in comparison to the amount of similar land available in the region and on Fort Bliss. Minimal impacts on land use and aesthetics would occur.
Soils	No impacts on soils would occur.	Approximately 19 acres of soils would be disturbed by the Proposed Action. Soils on an additional area of land measuring approximately 0.25 acre would be impacted by construction of the proposed acceleration/deceleration lane. Best Management Practices (BMPs) as described in a Stormwater Pollution Prevention Plan (SWPPP) would minimize soil loss during and after construction, so there would be minor impacts on soils.
Surface Water	No impacts on surface water would occur.	No impacts on surface water would occur, because no surface water is present in the area. Three detention basins would be constructed around the perimeter of the site to control stormwater runoff from at least a 100-year storm event. No stormwater would flow onto Montana Avenue from the proposed facility. Construction stormwater permitting would be obtained through the TCEQ National Pollution Discharge Elimination System (NPDES) process as required under the Clean Water Act (CWA). A SWPPP would be developed and implemented to prevent stormwater runoff during and following construction.
Groundwater	No impacts on groundwater would occur.	There would be no activities associated with the proposed ICE facility that could threaten Hueco Bolson groundwater quality. With the relocation of employees from offices around the city to the proposed new location on Fort Bliss, no net increase in groundwater demand would be expected. Minor impacts on groundwater resources related to construction activities would occur due to water needed for construction and dust suppression.
Biological Resources	No impacts on biological resources would occur.	No Federally listed species would be affected. Potential impacts on biological resources as a result of the loss of vegetation and wildlife habitat would be considered long-term but minor because of the vast amounts of similar habitat and vegetation communities throughout Fort Bliss and the region. Some sensitive species such as Texas horned lizard (*Phrynosoma cornutum*), western burrowing owl (*Athene cunicularia*), and migratory birds protected under the Migratory Bird Treaty Act (MBTA) may be minimally impacted. To minimize impacts on migratory birds, the Texas horned lizard, and the western burrowing owl, all site preparation and utility installation would require either a preconstruction survey for nesting birds and lizard activity, and avoidance if discovered, or that the work be carried out in the fall and winter months to coincide with the non-breeding season for these species.
Cultural Resources	No impacts on cultural resources would occur.	No adverse impacts on cultural resources are anticipated. Any unanticipated subsurface cultural resources encountered during the construction of the proposed ICE facility would be properly mitigated under Fort Bliss supervision in accordance with the procedures set forth in the Programmatic Agreement (PA) between Fort Bliss and the Texas SHPO.
Air Quality	No impacts on air quality would occur.	During construction, the Proposed Action would result in temporary, minor increases in vehicle emissions from worker commutes, equipment transfer and use, and fugitive dust emissions. Temporary dust emissions would be minimized through BMPs such as dust suppression methods. During construction, proper routine maintenance of all vehicles and other construction equipment would be implemented to ensure that emissions are within design standards of all construction equipment.
Climate	No impacts on climate would occur.	Construction-related air emissions of carbon dioxide (CO_2) and CO_2 equivalents would be temporary and minor. No permanent impacts on climate would occur, as there would be no net change in commute for workers.
Noise	No impacts on noise would occur.	Noise generated by the construction activities would be intermittent and last for approximately 1 year, after which noise levels would return to ambient levels. To minimize this impact, construction activities should be limited to daylight hours. Noise impacts would be minor if these timing restrictions are implemented during construction. Therefore, the noise impacts from construction activities would be considered negligible.
Traffic and Transportation	No impacts on traffic would occur.	There would be long-term, moderate adverse impacts on traffic and roadway wear and tear as a result of additional vehicle traffic on Montana Avenue. Additional traffic and large numbers of vehicles making U-turns would add traffic to already congested intersections. An acceleration/deceleration lane along Montana Avenue would be built to improve traffic flow and safety. Additional traffic management measures, such as U-turn lanes on Montana Avenue, could be added to minimize impacts, pending approval from the TxDOT and the City of El Paso. Project construction activities would cause temporary, minor impacts on traffic and wear and tear on area roads.

Resource	No Action Alternative	Proposed Action
Health and Safety	No impacts on health and safety would occur.	During construction, all applicable Occupational Safety and Health Administration (OSHA) rules and regulations would be followed by project contractors. Heavy equipment operation areas and trenching locations would be secured to prevent inadvertent public access. Under the Proposed Action, health impacts would be minimal. Safety impacts would be minimal with OSHA rules and regulations and BMPs in place. Minor, long-term traffic safety impacts could result from vehicles turning into the facility, as well as vehicles merging into traffic as they exit the facility; however, a planned acceleration/deceleration lane along Montana Avenue would minimize the impacts.
Hazardous Materials and Waste	No impacts from hazardous materials would occur.	The potential adverse effects of hazardous materials would be minor and minimized through the implementation of BMPs. Construction of the Proposed Action would require machinery and the use of petroleum, oil, and lubricants (POL). A limited amount of hazardous materials and waste would be used or generated during routine maintenance and operation of facilities and equipment. Secondary containment would be used to capture POL. All hazardous and regulated wastes and substances generated during construction would be collected, characterized, labeled, stored, transported, and disposed of in accordance with all Federal, state, and local regulations, including proper waste manifesting procedures through the Fort Bliss Hazardous Waste Curbside service. Access for the Curbside service would be required as a design feature of the facility. Solid waste would be separated into appropriate containers and disposed of at a waste facility. Fort Bliss has a Spill Prevention, Control, and Countermeasures Plan (SPCCP) and Installation Spill Contingency Plan (ISCP) in place that would be followed during operations. Building materials used in the construction of the facility would be free of asbestos-containing materials and lead-based paint. All building materials used would be verified as asbestos-free based on the manufacturer's technical specification sheet or material safety data sheet.
Utilities Infrastructure	No impacts on utilities infrastructure would occur.	The Proposed Action would have negligible impacts on utilities infrastructure. The facility would obtain water, sewer, natural gas, and electric power services from city and private providers, as appropriate. These services are available along Montana Avenue. Secure fiber-optic lines would be obtained from a private contractor. Three stormwater detention basins are planned around the proposed administrative facility to capture runoff.
Socioeconomics	No impacts on population, housing, income, or employment would occur.	The Proposed Action would consolidate seven ICE offices around El Paso into one facility. This shift in office locations would have negligible temporary and permanent impacts on population, housing, income, and employment.
Environmental Justice	No environmental justice impacts would occur.	The Proposed Action would result in a transfer of employees from seven offices across the city into one facility. While El Paso County has a high minority and low-income population and Census Tract 103.22, which is immediately south of the proposed administrative facility, is high minority, neither construction activities nor shifting employees from the seven locations to one would be expected to result in disproportionate negative impacts on minority or low-income populations in the region or the area around the proposed facility. The implementation of the Proposed Action would not be expected to cause environmental health risks or safety risks that would disproportionately affect children.

3.1.2 Environmental Consequences

3.1.2.1 No Action Alternative

Under the No Action Alternative, no impacts on land use or aesthetics would occur because no construction or other changes in land use would take place.

3.1.2.2 Proposed Action

The proposed ICE facility site is currently undeveloped and relatively undisturbed, but the proposed land use is consistent with the land use and zoning in the area. The loss or degradation of this undeveloped land is minimal in comparison to the amount of similar lands available in the region and on Fort Bliss. Approximately 19 acres of land would be impacted. An additional area of land measuring approximately 0.25 acre would be impacted by construction of the proposed acceleration/deceleration lane. The Proposed Action would have minor impacts on land use.

Development is currently located to the east of the site and future development is also planned along Montana Avenue in the vicinity of the site; therefore, the proposed ICE facility would have a negligible impact on aesthetics and visual resources of the area.

3.2 Soils

3.2.1 Affected Environment

Soils within the proposed ICE facility area are mapped as Copia-Nations complex, 1 to 3 percent slopes (U.S. Department of Agriculture [USDA] 2003). Wind action has formed the soils into coppice dunes (sand dunes up to approximately 15 feet high, anchored by mesquite shrubs) across the region. Soil texture is predominantly loamy fine sand. A "caliche" (petrocalcic) horizon of soil calcium carbonate is sometimes present beneath the coppice dunes or is exposed between the dunes in places.

The Fort Bliss Soil Survey (USDA 2003) provides details on the usability and trafficability ratings of these and other soils on Fort Bliss. Soils in the project area are susceptible to wind erosion and dust generation, but are less prone to water erosion (sheets wash and rill erosion). Fort Bliss resource management objectives include preventing the deterioration of highly erodible soil resources (U.S. Army 2008b).

3.2.2 Environmental Consequences

3.2.2.1 No Action Alternative

Under the No Action Alternative, no impacts on soils would occur because no construction or other changes to the land would take place.

3.2.2.2 Proposed Action

Under the Proposed Action, approximately 19 acres of soils would be permanently disturbed and developed. Soils on an additional area of land measuring approximately 0.25 acre would be impacted by construction of the proposed acceleration/deceleration lane.

The potential for fugitive dust would occur during construction. Direct post-construction impacts on soils include the physical disturbance of upper soil layers, including biological crusts,

and the disruption of soil processes caused by activities that alter the natural soil layers or result in accelerated erosion, increased soil compaction, loss of protective vegetation, and loss of soil productivity. Impacts would depend on the frequency, intensity, total area of disturbance, and amount of bare ground created. Development could increase the potential for soil erosion (water and wind). BMPs described by a SWPPP would minimize soil loss during and after construction, so there would be minor impacts on soils. Indirect effects (e.g., soil compaction), including reduced surface water infiltration, increased surface water runoff, increased wind erosion due to loss of vegetation, and poor plant growth and seed germination, would also be minor.

3.3 Surface Water

3.3.1 Affected Environment

No Federally regulated wetlands, arroyo-riparian drainages, or playas, as defined by the U.S. Army Corps of Engineers (USACE) under Section 404 of the CWA of 1972, occur in the parcel that would be leased to ICE.

3.3.2 Environmental Consequences

3.3.2.1 No Action Alternative

Under the No Action Alternative, no impacts on surface water would occur because no construction or other change to the land would take place, and no surface water is present in the area.

3.3.2.2 Proposed Action

There would be no direct impacts on surface water because there is none present in the area of the Proposed Action. Stormwater runoff would be collected in three detention basins constructed around the perimeter of the site. Construction stormwater permitting would be obtained through the TCEQ NPDES process, as required under the CWA. Construction would be subject to SWPPP and Section 438 of the Energy Independence and Security Act (EISA).

3.4 Groundwater

3.4.1 Affected Environment

Fort Bliss is located primarily in the Tularosa-Hueco Basin of the Basin and Range Physiographic Province, with small portions in the Mesilla Basin and the Salt Basin. Hueco Bolson provides groundwater to the City of El Paso, the Fort Bliss cantonment (including the project area), and Cuidad Juarez, Mexico (U.S. Army 2010). Estimates of groundwater availability representing the amount of usable water in the Hueco Bolson aquifer in Texas are varied, ranging from 3 million to 10.6 million acre-feet. El Paso Water Utilities (EPWU) estimates that fresh water in the Hueco Bolson totals approximately 9.4 million acre-feet. The depth to groundwater near El Paso ranges from 259 to 400 feet below the surface (U.S. Army 2010).

3.4.2 Environmental Consequences

3.4.2.1 No Action Alternative

Under the No Action Alternative, no impacts on groundwater would occur because no construction or other change to the land would take place.

3.4.2.2 Proposed Action

Under the Proposed Action, ICE employees would be relocated from offices around the city to the proposed new location on Fort Bliss. As a result, no net increase in groundwater demand would be expected. Once operational, there would be no activities associated with the proposed ICE facility that could threaten Hueco Bolson groundwater quality. Permanent impacts on groundwater resources, if any, would be negligible. Minor impacts on groundwater resources related to construction activities would occur under the Proposed Action due to water needed for construction and dust suppression. Stormwater detention basins around the parking lots at the new ICE facility would allow for continued percolation of rainwater for groundwater recharge.

3.5 Biological Resources

3.5.1 Affected Environment

The USFWS, under the Endangered Species Act (ESA) of 1973, and the State of Texas list various species of flora and fauna that are known to occur or have the potential to occur on Fort Bliss as Threatened, Endangered, or Species of Concern. Additionally, Locally Important Natural Resources (LINRs) have been identified for protection by Fort Bliss. These include black grama grasslands, sand sagebrush communities, shinnery oak islands, arroyo-riparian drainages, and playa lakes (U.S. Army 2010). A description of biological resources and information on habitat and occurrences can be found in the SEIS (U.S. Army 2007), the *Growth and Force Structure Realignment Final Environmental Impact Statement* (GFS EIS) (U.S. Army 2010), and the *Fort Bliss Integrated Natural Resources Management Plan, November 2009* (U.S. Army 2009). These documents are incorporated herein by reference and can be found at https://www.bliss.army.mil.

On Fort Bliss, 61 sensitive species of flora and fauna are known to occur or have the potential to occur, of which 31 have Federal special status. Seven are listed as threatened or endangered under the ESA, and one is a candidate for listing. The remaining 23 are listed as species of concern. In addition to those Federally listed and special status species, seven are listed as Texas threatened animals, and five as endangered animals in the state. While most of these species are known to occur on Fort Bliss land, the probability of these species occurring within the 19-acre site proposed for development is low due to the lack of suitable habitat. However, the state-listed Texas horned lizard (*Phrynosoma cornutum*) and western burrowing owl (*Athene cunicularia*) have the potential to occur within the project area. In addition, the Proposed Action is located in habitat that could be utilized by bird species protected under the Migratory Bird Treaty Act (MBTA) (US Army 2009).

The proposed ICE administration building would be located on approximately 19 acres of mesquite coppice dune habitat, typical of the northern Chihuahuan Desert. The parcel is dominated by honey mesquite (*Prosopis glandulosa*). Other vegetation found on the parcel are four-wing saltbush (*Atriplex canescens*), broom snakeweed (*Gutierrezia sarothrae*), and various

annual forbs. Wildlife that may be found within the area includes Merriam's kangaroo-rat (*Dipodomys merriami*), black-tailed jackrabbit (*Lepus californicus*), desert cottontail (*Sylvilagus audubonii*), coyote (*Canus latrans*), Gambel's quail (*Callipepla gambelii*), red-tailed hawk (*Buteo jamaicensis*), and Swainson's hawk (*Buteo swainsoni*).

3.5.2 Environmental Consequences

3.5.2.1 No Action Alternative

Under the No Action Alternative, no impacts on biological resources would occur because no construction or other changes to the land would take place.

3.5.2.2 Proposed Action

No Federally listed species would be affected. The potential impact on biological resources as a result of the loss of vegetation and wildlife habitat would be considered long-term but minor because of the vast amounts of similar habitat and vegetation communities throughout Fort Bliss and the region. Approximately 31 percent of Fort Bliss land (348,847 acres) is characterized as coppice dunes (U.S. Army 2009). The 19 acres impacted by the Proposed Action represents much less than 1 percent of the available habitat. Some sensitive species, such as Texas horned lizard, western burrowing owl, and migratory birds protected under the MBTA, may be minimally impacted. To minimize impacts on migratory birds and the Texas horned lizard, all site preparation and utility installation would require either a preconstruction survey for nesting birds and lizard activity, and avoidance if discovered, or that all clearing, grubbing, and ground disturbance be carried out in the fall and winter months to coincide with the non-breeding season for these species.

3.6 Cultural Resources

3.6.1 Affected Environment

Cultural resources are important because of their association or linkage to past events, historically important persons, design and construction values, and their ability to yield important information about history. The project area for the Proposed Action is on Fort Bliss property. Cultural resources are regulated at Fort Bliss per the National Historic Preservation Act (NHPA) of 1966, the Native American Graves Protection and Repatriation Act (NAGPRA) of 1990, the Archaeological Resources Protection Act (ARPA) of 1979, and other statutes. Pursuant to Army Regulation AR 200-1, the Garrison Commander at Fort Bliss is responsible for managing the cultural resources on the installation in compliance with all Federal laws, regulations, and standards. Fort Bliss manages cultural resources associated with all prehistoric and historic periods recognized in west Texas and south-central New Mexico. The *Fort Bliss Texas and New Mexico, Mission and Master Plan, Programmatic Environmental Impact Statement* (MMP EIS) (U.S. Army 2000) describes in detail the cultural history of Native Americans and post-contact inhabitants in the region. The *Integrated Cultural Resources Management Plan* (ICRMP) for Fort Bliss (U.S. Army 2008a) also contains detailed information about the history of Fort Bliss and its lands. Both documents are incorporated herein by reference and can be found at https://www.bliss.army.mil.

The project area associated with the Proposed Action has been included in three previous surveys. One investigation was conducted by the University of Texas El Paso (UTEP) in the late

1970s and covered 500 square kilometers (193 square miles) (Whalen et al. 1978). A second investigation covering 3,097 acres and National Register of Historic Places (NRHP) evaluation of 20 sites was conducted by Geo-Marine, Incorporated (GMI) and reported in 2008 (Russell and Arford 2008), and the third investigation was conducted by Fort Bliss staff and involved the re-evaluation of seven archaeological sites inside Texas Loop 375 and Montana Avenue (Burt 2011).

The UTEP survey consisted of an intensive archaeological pedestrian survey and historical and architectural evaluation of historic buildings. The investigation resulted in the recording of 1,844 archaeological sites and 187 buildings over 50 years of age as of 1978 (Whalen et al. 1978). The investigation provided an extensive cultural characterization and settlement system analysis over a large portion of Fort Bliss managed lands.

The later GMI investigation also included an intensive archaeological pedestrian survey that covered 3,047 acres and overlapped considerable portions of the earlier UTEP study. The GMI investigation revisited 273 previously documented sites. Of the previously documented sites, 140 could not be relocated, 44 no longer met criteria defining them as sites, and 89 were incorporated within new site boundaries. In the case of 38 sites, the newly defined boundaries resulted in the combination of one or more previously recorded sites. The GMI investigation also recorded 26 newly identified sites (Russell and Arford 2008).

The Fort Bliss investigation (Burt 2011) re-evaluated seven archaeological sites previously recommended eligible for the NRHP and located between Texas Loop 375 (also known as Purple Heart Boulevard) and Montana Avenue. The sites were tested and evaluated against standards developed in *Significance and Research Standards for Prehistoric Archaeological Sites at Fort Bliss: A Design for the Evaluation, Management and Treatment of Cultural Resources (*Miller and Landreth 2009). The investigation resulted in the previous eligibility recommendations for the seven sites being re-evaluated as not eligible for the NRHP (Burt 2011). Between the UTEP, GMI, and Fort Bliss investigations, the entire Proposed Action area has been subject to previous cultural resources investigation.

3.6.2 Environmental Consequences

3.6.2.1 No Action Alternative

Under the No Action Alternative, the ICE facility would not be constructed and the consolidation of ICE's seven offices would not take place at this location; therefore, no impacts on cultural resources would occur.

3.6.2.2 Proposed Action

ICE, operating on Fort Bliss property, would follow the cultural resources management plan outlined in the Fort Bliss ICRMP (U.S. Army 2008) developed for compliance with all Federal laws, regulations, and standards, including NHPA, NAGPRA, ARPA, and other statutes. The entire area encompassing the proposed ICE facility has been subject to previous cultural resources surveys, and no eligible cultural resources have been reported. Therefore, no adverse impacts on cultural resources are anticipated through implementation of the Proposed Action.

It should be stipulated that if any subsurface cultural resources are encountered during the construction of the proposed ICE facility, they would be properly mitigated under Fort Bliss supervision in accordance with the procedures set forth in the PA between Fort Bliss and the Texas SHPO. Any discovery of possible human remains would be treated in accordance with the NAGPRA and the Standard Operating Procedures (SOP) set out in the ICRMP.

3.7 Air Quality

3.7.1 Affected Environment

The USEPA established National Ambient Air Quality Standards (NAAQS) for specific pollutants determined to be of concern with respect to the health and welfare of the general public. Ambient air quality standards are classified as either "primary" or "secondary." The major pollutants of concern, or criteria pollutants, are carbon monoxide (CO), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), ozone (O_3), particulate matter less than 10 microns (PM-10), particulate matter less than 2.5 microns (PM-2.5), and lead. NAAQS represent the maximum levels of background pollution that are considered safe, with an adequate margin of safety, to protect the public health and welfare. The NAAQS are included in Appendix B.

Areas that do not meet these NAAQS standards are called non-attainment areas; areas that meet both primary and secondary standards are known as attainment areas. The Federal Conformity Final Rule (40 CFR Parts 51 and 93) specifies criteria and requirements for conformity determinations for Federal projects. The Federal Conformity Rule was first promulgated in 1993 by the USEPA, following the passage of Amendments to the Clean Air Act in 1990. The rule mandates that a conformity analysis be performed when a Federal action generates air pollutants in a region that has been designated as a non-attainment or maintenance area for one or more pollutants covered by NAAQS.

A conformity analysis is the process used to determine whether a Federal action meets the requirements of the General Conformity Rule. It requires the responsible Federal agency to evaluate the nature of a Proposed Action and associated air pollutant emissions and calculate emissions that may result from the implementation of the Proposed Action. If the emissions exceed established limits, known as *de minimis* thresholds, the proponent is required to perform a conformity determination and implement appropriate mitigation measures to reduce air emissions.

The USEPA and TCEQ have designated the City of El Paso as a non-attainment area for all PM-10, a portion of the city as a maintenance area for CO, and El Paso County as a maintenance area for the 8-hour ozone standard (USEPA 2012 and TCEQ 2012).

3.7.2 Environmental Consequences

3.7.2.1 No Action Alternative

The No Action Alternative would not result in any direct impacts on air quality because there would be no construction or operational activities.

3.7.2.2 Proposed Action

3.7.2.2.1 Construction-Related Air Emissions

Temporary and minor increases in air pollution would occur from the use of construction equipment (combustion emissions) and the disturbance of soils (fugitive dust). Several sources of air pollutants would contribute to the overall air impacts, including:

- Combustion engines of construction equipment;
- Construction workers commuting to and from work;
- Supply trucks delivering materials to construction site; and
- Job site ground disturbances.

Fugitive dust emissions were calculated using USEPA's preferred emission factor of 0.19 ton per acre per month (Midwest Research Institute 1996), which is a more current standard than the 1985 PM-10 emission factor of 1.2 tons per acre-month presented in AP-42 Section 13 Miscellaneous Sources 13.2.3.3 (USEPA 2001).

NONROAD2008a model was used to estimate air emissions from construction equipment. It is the USEPA's preferred model for estimating emissions from non-road sources (USEPA 2009a). Combustion emission calculations were made for standard construction equipment, such as a backhoe, bulldozer, dump truck, crane, and cement truck. Assumptions were made regarding the total number of days and hours each piece of equipment would be used.

Construction workers would temporarily increase the combustion emissions in the airshed during their commute to and from the project area. Emissions from trucks delivering materials such as cement, fill, and supplies would also contribute to the overall air emissions budget. Emissions from delivery trucks and construction workers traveling to the job site were calculated using USEPA's preferred on-road vehicle emission model MOVES2010a (USEPA 2009b).

The total air quality emissions from the construction activities were calculated to compare to the *de minimis* thresholds of the General Conformity Rule. Summaries of the total emissions for construction activities are presented in Table 3-2. Details of the conformity analyses are presented in Appendix B.

Table 3-2. Total Air Emissions (tons/year) from Construction Activities versus the *de minimis* Threshold Levels

Pollutant	Total (tons/year)	*de minimis* Thresholds (tons/year) [1]
CO	21.21	100
Volatile Organic Compounds (VOC)	15.48	100
Nitrous Oxides (NOx)	43.56	100
PM-10	26.63	100
PM-2.5	5.87	100
SO_2	4.39	100

Source: 40 CFR 51.853 and Gulf South Research Corporation (GSRC) model projections (Appendix B)

[1] Note that the City of El Paso is in non-attainment area for all PM-10, a portion of the city is a maintenance area for CO, and El Paso County is a maintenance area for the 8-hour ozone standard (USEPA 2012).

As can be seen in Table 3-2, air emissions from construction of the Proposed Action do not exceed Federal *de minimis* thresholds. As there are no violations of air quality standards and no conflicts with the state implementation plans, the impacts on air quality in El Paso County from the implementation of the Proposed Action would be negligible. During construction, proper and routine maintenance of all vehicles and other construction equipment would be implemented to ensure that emissions are within the design standards of all construction equipment. Dust suppression methods should be implemented to minimize fugitive dust, including wetting solutions applied to construction areas.

3.7.2.2.2 Operational Air Emissions

Operational air emissions refer to air emissions that may occur after the Proposed Action has been constructed and implemented. Seven existing ICE offices would be closed and employees moved to the new facility, so there would be no net increase in operational air emissions as a result of the Proposed Action.

3.8 Climate

3.8.1 Affected Environment

Nicknamed "The Sun City," El Paso has a dry desert climate. Average rainfall is 8.65 inches per year (30-year average), mostly in the summer and often from thunderstorms that cause flash flooding. Wind and dust storms are common in the spring, with high winds picking up sand and causing loss of visibility. At an approximate elevation of 4,000 feet above mean sea level, the city also receives winter snow. Temperatures range from a mean low of 50.6 degrees Fahrenheit to a mean high of 76.8 degrees Fahrenheit (City of El Paso 2012).

3.8.1.1 Greenhouse Gases and Climate Change

Global climate change refers to a change in the average weather on the earth. Greenhouse gases (GHG) are gases that trap heat in the atmosphere. They include water vapor, CO_2, methane (CH_4), nitrous oxide (N_2O), fluorinated gases including chlorofluorocarbons (CFC) and hydrochlorofluorocarbons (HFC), and halons, as well as ground-level O_3 (California Energy Commission 2007).

The major GHG-producing sectors in society include transportation, utilities (e.g., coal and gas power plants), industry/manufacturing, agriculture, and residential. End-use sector sources of GHG emissions include transportation (40.7 percent), electricity generation (22.2 percent), industry (20.5 percent), agriculture and forestry (8.3 percent), and other (8.3 percent). The main sources of increased concentrations of GHG due to human activity include the combustion of fossil fuels and deforestation (CO_2), livestock and rice farming, land use and wetland depletions, landfill emissions (CH_4), refrigeration system and fire suppression system use and manufacturing (CFC), and agricultural activities, including the use of fertilizers (California Energy Commission 2007).

3.8.1.2 GHG Threshold of Significance

The CEQ drafted guidelines for determining meaningful GHG decision-making analysis. The CEQ guidance states that if the project would be reasonably anticipated to cause direct emissions of 25,000 metric tons (27,557 U.S. tons) or more of CO_2 GHG emissions on an annual basis,

agencies should consider this a threshold for decision makers and the public. CEQ does not propose this as an indicator of a threshold of significant effects, but rather as an indicator of a minimum level of GHG emissions that may warrant some description in the appropriate NEPA analysis for agency actions involving direct emissions of GHG (CEQ 2010).

The GHG covered by Executive Order (EO) 13514 are CO_2, CH_4, N_2O, HFC, perfluorocarbons, and sulfur hexafluoride. These GHG have varying heat-trapping abilities and atmospheric lifetimes. CO_2 equivalency (CO_2e) is a measuring methodology used to compare the heat-trapping impact from various GHG relative to CO_2. Some gases have a greater global warming potential than others. NO_x, for instance, have a global warming potential that is 310 times greater than an equivalent amount of CO_2, and CH_4 is 21 times greater than an equivalent amount of CO_2.

3.8.2 Environmental Consequences

3.8.2.1 No Action Alternative

Under the No Action Alternative, no impacts on climate would occur because no construction or other changes to the land would take place.

3.8.2.2 Proposed Action

Under the Proposed Action, temporary construction-related air emissions of CO_2 and CO_2 equivalents are estimated to be 13,774 tons during the estimated one-year construction period. These emissions do not exceed the Federal *de minimis* threshold of 27,557 tons per year, and impacts would be minor.

The 500 ICE employees would be relocated from the seven existing ICE offices within the same airshed. As a result, there would be no net increases in air emissions related to operations.

3.9 Noise

3.9.1 Affected Environment

Noise is generally described as unwanted sound, which can be based either on objective effects (i.e., hearing loss, damage to structures, etc.) or subjective judgments (e.g., community annoyance). Sound is usually represented on a logarithmic scale with a unit called the decibel (dB). Sound on the decibel scale is referred to as sound level. The threshold of human hearing is approximately 0 dB, and the threshold of discomfort or pain is around 130 dB. The A-weighted decibel (dBA) is a measurement of sound pressure adjusted to conform with the frequency response of the human ear. The dBA metric is most commonly used for the measurement of environmental and industrial noise.

Noise levels occurring at night generally produce a greater annoyance than do the same levels occurring during the day. It is generally agreed that people perceive intrusive noise at night as being 10 dBA louder than the same level of intrusive noise during the day, at least in terms of its potential for causing community annoyance. This perception is largely because background environmental sound levels at night in most areas are about 10 dBA lower than those during the day.

Long-term noise levels are computed over a 24-hour period and adjusted for nighttime annoyances to produce the day-night average sound level (DNL). DNL is the community noise metric recommended by the USEPA and has been adopted by most Federal agencies (USEPA 1974). A DNL of 65 dBA is the level most commonly used for noise planning purposes and represents a compromise between community impact and the need for activities like construction.

3.9.1.1 Residential Neighborhoods

Acceptable noise levels have been established by the U.S. Department of Housing and Urban Development (HUD) for construction activities in residential areas (HUD 1984):

> **Acceptable** (not exceeding 65 dBA) – The noise exposure may be of some concern, but common building construction would make the indoor environment acceptable, and the outdoor environment would be reasonably pleasant for recreation and play.
>
> **Normally Unacceptable** (above 65 but not greater than 75 dBA) – The noise exposure is significantly more severe; barriers may be necessary between the site and prominent noise sources to make the outdoor environment acceptable; special building construction may be necessary to ensure that people indoors are sufficiently protected from outdoor noise.
>
> **Unacceptable** (greater than 75 dBA) – The noise exposure at the site is so severe that the construction costs to make the indoor noise environment acceptable may be prohibitive, and the outdoor environment would still be unacceptable.

3.9.1.2 Outdoor Construction

Noise emission abatement criteria for construction activities have been adopted by the Federal Highway Administration (FHWA). The FHWA noise abatement criteria specify outdoor noise levels (dBA) for various land use activity categories. The criteria thresholds are used to assess the impacts from short-term noise emissions associated with construction. Table 3-3 presents the FHWA outdoor noise abatement criteria for construction noise emissions.

Table 3-3. FHWA Outdoor Construction Noise Abatement Criteria

Activity Category	Hourly dBA	Description of Activity Category	Type of Land Uses
A	57	Lands on which serenity and quiet are of extraordinary significance and serve an important public need and where the preservation of those qualities is essential if the area is to continue to serve its intended purpose.	National Wilderness Areas, National Parks, State and Federal Wildlife Refuges
B	67	Picnic areas, recreation areas, playgrounds, active sports areas, parks, residences, motels, hotels, schools, churches, libraries, and hospitals.	National Forests, public beaches, city parks, community commons areas
C	72	Developed lands, properties, or activities not included in categories A or B above.	Industrial parks, commercial areas

Source: 23 CFR 772 Table 1

3.9.1.3 Noise Attenuation

As a general rule of thumb, noise generated by a stationary noise source, or "point source," will decrease by approximately 6 dBA over hard surfaces and 9 dBA over soft surfaces for each doubling of the distance. For example, if a noise source produces a noise level of 85 dBA at a reference distance of 50 feet over a hard surface, then the noise level would be 79 dBA at a distance of 100 feet from the noise source, 73 dBA at a distance of 200 feet, and so on. To estimate the attenuation of the noise over a given distance, the following relationship is utilized:

$$\text{Equation 1: } dBA_2 = dBA_1 - 20 \log^{(d2/d1)}$$

Where:

dBA_2 = dBA at distance 2 from source (predicted)
dBA_1 = dBA at distance 1 from source (measured)
d_2 = Distance to location 2 from the source
d_1 = Distance to location 1 from the source

Source: California Department of Transportation (Caltrans) 1998

Montana Avenue is immediately south of the project site, and residential neighborhoods are located south of Montana Avenue. The residential homes are approximately 210 feet south of the project site (across Montana Avenue). Immediately to the east of the project site is the AFRC. There are storage and maintenance buildings approximately 310 feet from the eastern boundary and office buildings approximately 750 feet from the eastern boundary.

3.9.2 Environmental Consequences

3.9.2.1 No Action Alternative

Under the No Action Alternative, the sensitive noise receptors near the proposed project site would not experience construction-related or operational noise events.

3.9.2.2 Proposed Action

The proposed construction activities would require the use of common construction equipment. Table 3-4 presents noise emission levels for construction equipment expected to be used during the proposed construction activities. Anticipated sound levels at 50 feet from various types of construction equipment range from 76 dBA to 84 dBA, based on data from the FHWA (2007).

Table 3-4. A-Weighted (dBA) Sound Levels of Construction Equipment and Modeled Attenuation at Various Distances[1]

Noise Source	50 feet	100 feet	200 feet	500 feet	1000 feet
Backhoe	78	72	66	58	51
Crane	81	75	69	61	54
Dump Truck	76	70	64	56	49
Excavator	81	75	69	61	54
Concrete mixer truck	79	73	67	59	52
Bulldozer	84	78	72	64	57
Front-end loader	82	76	70	62	55

Source: FHWA 2007
[1] The dBA at 50 feet is a measured noise emission. The 100- to 1,000-foot results are GSRC modeled estimates.

Construction would involve the use of a bulldozer, which has a noise emission level of 84 dBA at 50 feet from the source. Assuming the worst case scenario, the noise model (Caltrans 1998) estimates that noise emissions of 84 dBA would have to travel 450 feet before they would attenuate to an acceptable level of 65 dBA. To achieve an attenuation of 84 dBA to a normally unacceptable level of 75 dBA, the distance from the noise source to the receptor would need to be 140 feet.

Depending upon the number of construction hours, and the number, type, and distribution of construction equipment being used, the noise levels near the project area could temporarily exceed 65 dBA up to 433 feet from the project area. Geographic Information Systems (GIS) was used to determine the number of sensitive noise receptors within 433 feet from the edge of the project corridor. Approximately 47 sensitive noise receptors (residential homes) may experience temporary noise intrusion equal to or greater than 65 dBA from construction equipment. The AFRC building is approximately 750 feet to the east of the project site and should not experience noise emissions greater than 65 dBA.

Noise generated by the construction activities would be intermittent and last for approximately 1 year, after which noise levels would return to ambient levels, including noise on Montana Avenue. To minimize this impact, potential construction activities should be limited to daylight hours. Noise impacts would be minor if these timing restrictions are implemented during construction.

3.10 Traffic and Transportation

3.10.1 Affected Environment

Major transportation arteries in the area around the proposed ICE facility are shown in Figure 3-1. The proposed ICE facility would be located on the north side of Montana Avenue between Lee Boulevard and Saul Kleinfeld Drive, just west of the AFRC. The AFRC is located directly across Montana Avenue from the Saul Kleinfeld Drive intersection. At this location, Montana Avenue is a divided highway. Two secure vehicular access entrances would be built to provide ingress and egress for the new facility from Montana Avenue. The ICE facility is set back 200 feet from Montana Avenue, providing TxDOT an area for road widening planned in the near future. An acceleration/deceleration lane would be built along Montana Avenue to improve traffic flow and safety. Final ingress and egress design would be determined during the design/build phase of the project. All designs would be submitted to TxDOT and the El Paso Traffic Engineer's Office for review and approval.

Other transportation arteries in the region include US 54, locally referred to as the Patriot Freeway, which is a major non-Interstate divided highway west of Fort Bliss providing access to areas to the north. Texas Loop 375 (Purple Heart Highway), also an important regional traffic corridor, connects the northeast and eastern portions of the city and helps reduce traffic congestion along US 54. Texas Loop 375 crosses the Fort Bliss installation between Montana Avenue and US 54. To meet the corresponding demand of significant projected background traffic growth throughout El Paso, Texas Spur 601 was completed to provide a 7.4-mile connection between US 54 on the west and Texas Loop 375 on the east.

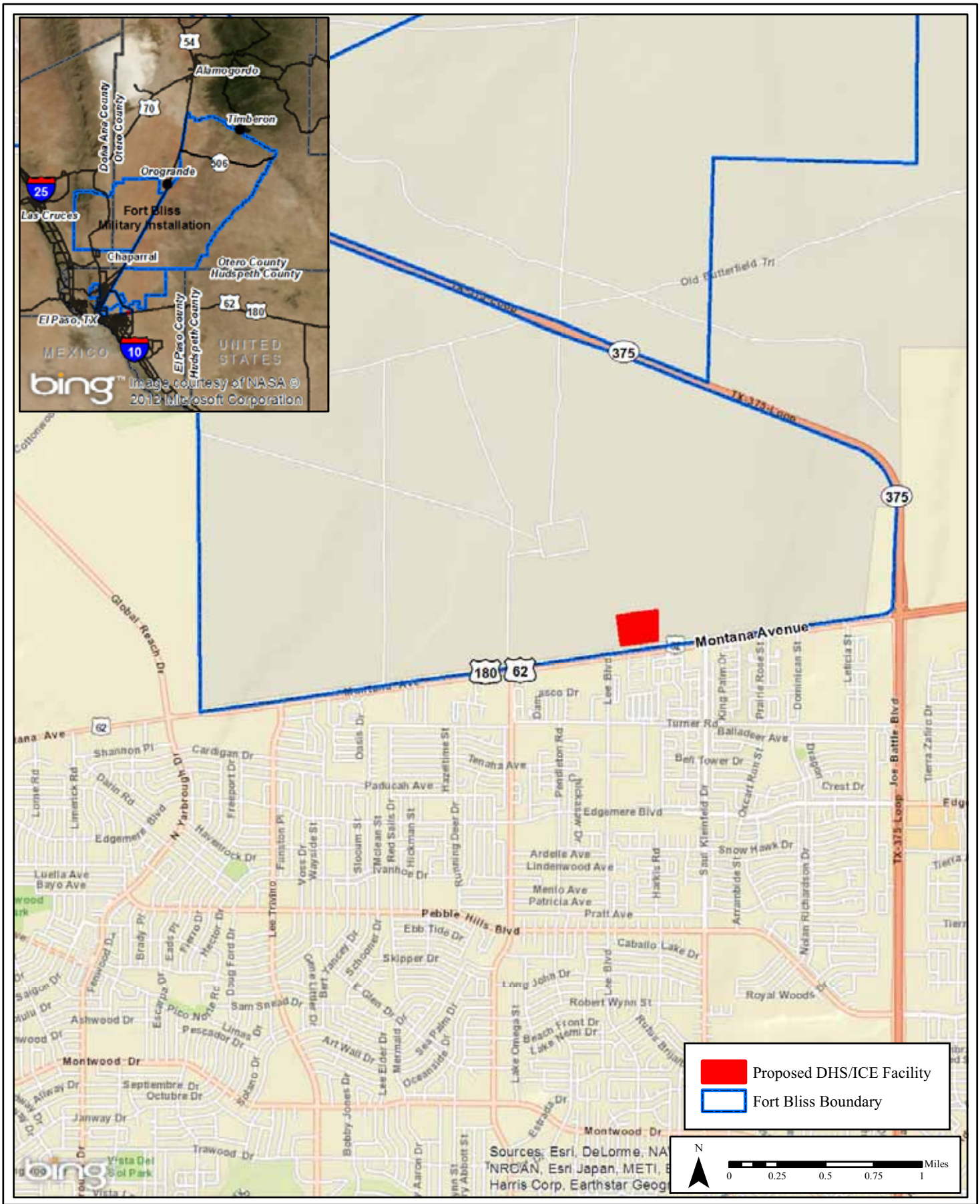

Figure 3-1. Major Transportation Arteries in the Vicinity of the Proposed ICE El Paso City Administrative Facility

GSRC

September 2012

Traffic counts and LOS scores for intersections in the area around the proposed ICE facility are shown in Table 3-5. LOS is a measure of the capacity of a roadway to handle the volume of traffic anticipated. The LOS scale ranges from A to F, where A is the best (free-flow conditions) and F is the worst (stop-and-go conditions). LOS A, B, and C are considered good operating conditions, while LOS D is considered below average, and LOS E and F are considered unacceptable. The table shows that the intersections on Montana Avenue near the proposed ICE facility have existing LOS ratings of B and C (Huitt-Zollars 2011).

Table 3-5. Traffic Counts and Level of Service for Nearby Intersections

Intersection	Average Daily Traffic on Montana Avenue (VPD)	Average Daily Traffic on Cross Street (VPD)	LOS for AM Peak Hour	LOS for PM Peak Hour
Montana Avenue at Saul Kleinfeld Dr.	36,215	5,112	C	C
Montana Avenue at Lee Boulevard	38,591	2,639	B	B

Sources: El Paso Department of Transportation and Huitt-Zollars 2011
VPD – vehicles per day
Note: Traffic counts for the Montana-Saul Kleinfeld intersection are from February 2011 and for the Montana-Lee Boulevard intersection are from March 2011 (El Paso Department of Transportation).

Roadway improvements planned for the near future by the City of El Paso and TxDOT include the addition of one lane in each direction on Montana Avenue. The additional capacity provided would be expected to improve LOS ratings for these intersections.

3.10.2 Environmental Consequences

3.10.2.1 No Action Alternative

Under the No Action Alternative, no impacts on traffic and transportation would occur because no construction or other changes to the land would take place.

3.10.2.2 Proposed Action

The addition of approximately 500 employees working in the proposed ICE facility would increase traffic on Montana Avenue. A Traffic Impact Analysis (TIA) for the proposed ICE facility, prepared by Huitt-Zollars, was completed in October 2011. The TIA is based on a phased build-out of the facility, which is no longer planned. The assumptions used in the TIA are considered the worse-case scenario, with facility impacts expected to be less than estimated in the report. The TIA main report is included in Appendix C, with the full report (including appendices) available on the Fort Bliss (www.bliss.army.mil) and USACE (http://ecso.swf.usace.army.mil/Pages/Publicreview.cfm) websites.

The ICE facility would be operational 24 hours daily. Assumptions for this analysis include:

- Two entrances providing access to and from Montana Avenue (as the worst case scenario)
- 500 employees
- 90 percent of the traffic associated with the facility expected between 6:00 a.m. and 6:00 p.m.

- Staggered 8.5-hour shifts: 20 percent begin work at 6:00 a.m., 25 percent at 7:00 a.m., 25 percent at 8:00 a.m., and 20 percent at 9:00 a.m.
- 53 percent of vehicles arrive from the west on Montana Avenue; 47 percent arrive from the east on Montana Avenue (Huitt-Zollars 2011)

Tables 3-6 and 3-7 present projected increases in peak hour traffic in the morning and afternoon, respectively, resulting from the employees at the proposed ICE facility using two entrances connecting to Montana Avenue in the year 2018. These projections show that morning peak hour traffic would increase 5 percent at the Montana/Saul Kleinfeld intersection, which would be estimated to result in an LOS rating of D, and 6 percent at the Montana/Lee Boulevard intersection, which would be estimated to result in an LOS rating of C. At morning peak hour, there would be an estimated 117 vehicles traveling eastbound and making a U-turn at the Montana/Saul Kleinfeld intersection.

Table 3-6. 2018 Morning Peak Hour Increase in Traffic for Nearby Intersections Proposed ICE Facility

Intersection	LOS for AM Peak Hour	Without Project Peak Hour VPH	With Project Additional* VPH	With Project Increase in VPH	Number of Vehicles Making a U-turn
Montana Avenue at Saul Kleinfeld Dr. (westbound)	D	2,479	125**	5%	117***
Montana Avenue at Lee Boulevard (eastbound)	C	1,058	66	6%	NA

Source: Huitt-Zollars Inc. 2011 and GSRC
VPH – Vehicles per hour NA – Not applicable
* Assumes that no more than 25 percent of the employees would be arriving/departing during any one hour
** 125 is the total of 59 vehicles coming from the east on Montana plus the 66 vehicles coming from the west that must make a U-turn at this intersection to access the ICE facility
*** 51 vehicles making a U-turn without the project plus 66 vehicles (with project) coming from the west and making a U-turn to go back to the ICE facility

Table 3-7. 2018 Afternoon Peak Hour Increase in Traffic for Nearby Intersections Proposed ICE Facility

Intersection	LOS for PM Peak Hour	Without Project Peak Hour VPH	With Project Additional* VPH	With Project Increase in VPH	Number of Vehicles Making a U-turn
Montana Avenue at Saul Kleinfeld Drive (eastbound)	C	2,043	59	3%	NA
Montana Avenue at Lee Boulevard (westbound)	C	1,490	125**	8%	100***

Source: Huitt-Zollars Inc. 2011 and GSRC
VPH – Vehicles per hour NA – Not applicable
* Assumes that no more than 25 percent of the employees would be arriving/departing during any one hour
**125 is the total number of vehicles going west on Montana after exiting the facility; it is assumed that 59 would make a U-turn at this intersection to turn back to the east
*** 41 vehicles making a U-turn without the project plus 59 vehicles (with project) leaving the facility and making a U-turn to go east

Projections for the afternoon show an 8 percent increase in traffic at the Montana/Lee Boulevard intersection, resulting in an LOS rating of C and a 3 percent increase in traffic at the Montana Avenue-Saul Kleinfeld Drive intersection (LOS of C). Projections for the afternoon show 100 westbound vehicles making a U-turn at the Montana Avenue/Lee Boulevard intersection.

There would be long-term, moderate adverse impacts on traffic and roadway wear and tear as a result of additional vehicle traffic on Montana Avenue. An acceleration/deceleration lane on westbound Montana Avenue would be built to promote traffic flow. However, additional traffic leaving the facility and the large numbers of vehicles making U-turns at the Saul Kleinfeld intersection in the morning and the Lee Boulevard intersection in the afternoon would add congestion to those intersections. In addition, project construction activities would cause temporary, minor impacts on traffic and wear and tear on area roads.

Traffic management strategies, such as the addition of U-turn lanes, could minimize the moderate adverse impacts on traffic on Montana Avenue. The addition of U-turn lanes to provide for additional vehicle turning capacity on eastbound Montana Avenue at Saul Kleinfeld and westbound at Lee Boulevard would improve traffic flow. However, the use of U-turn lanes or other traffic management measures would be contingent upon approval from the TxDOT and the City of El Paso (Stevenson 2012).

TxDOT will be granted 200 feet of additional right-of-way (ROW) on the north side of Montana Avenue. This additional ROW would be used to widen Montana Avenue and provide an acceleration/deceleration lane. TxDOT estimates that the widening would be started in 2015. The widening of Montana Avenue with the additional ingress/egress lanes would return the LOS to an acceptable level.

3.11 Health and Safety

3.11.1 Affected Environment

Federal, state, and Fort Bliss guidelines, rules, and regulations are in place to protect personnel throughout the installation. Safety information and analysis is found in the MMP EIS, and Fort Bliss Regulation 385-63. Health programs are promoted through U.S. Army Public Health Command and Medical Command. Various Fort Bliss procedures have also been established to meet health and safety requirements.

Health and safety hazards in the project area would likely occur during construction and could include exposure to dehydration and heat illness, contact with venomous animals and spiny vegetation, and vehicle accidents. In the long-term, safety could be impacted by vehicles turning in and out of the facilities from Montana Avenue.

3.11.2 Environmental Consequences

3.11.2.1 No Action Alternative

Under the No Action Alternative, no impacts on health and safety would occur because no construction or other changes to the land would take place.

3.11.2.2 Proposed Action

During construction, all applicable OSHA rules and regulations would be followed by project contractors. Heavy equipment operation areas and trenching locations would be secured to prevent inadvertent public access. Under the Proposed Action, health impacts would be minimal and would be minimized by measures to ensure proper hydration and avoidance of dangerous animals and plants. Safety impacts would be minimal with OSHA rules and regulations and BMPs in place. Minor impacts on long-term safety could result from vehicles turning into the facility, as well as vehicles merging into traffic as they exit the facility; however, a planned acceleration/deceleration lane along Montana Avenue would minimize the impacts.

3.12 Hazardous Materials and Waste

3.12.1 Affected Environment

Hazardous materials are substances that cause human physical or health hazards (29 CFR 1910.1200). Materials that are physically hazardous include combustible and flammable substances, compressed gases, and oxidizers. Health hazards are associated with materials that cause acute or chronic reactions, including toxic agents, carcinogens, and irritants.

Hazardous waste is produced from various equipment maintenance processes and is composed of any material listed in 40 CFR 261 Subpart D, or those that exhibit characteristics of toxicity, corrosivity, ignitability, or reactivity. Hazardous materials are regulated in Texas by a combination of mandated laws promulgated by the USEPA and TCEQ. In addition, hazardous wastes are managed on Fort Bliss under the Installation Hazardous Waste Management Plan, which provides detailed information on training; hazardous waste management roles and responsibilities; and hazardous waste identification, storage, transportation, and spill control, consistent with Federal and state regulations (U.S. Army 2011).

A survey of the proposed site found solid waste located on approximately 5 percent of the parcel, mostly along the southern and western edges of the dirt road parallel to Montana Avenue and an old dirt road that intersects the parcel. Most of the waste was typical household discarded material, although some construction material such as wood panels, shingles, possible asphalt remnants, and tires were found. Most of the waste does not pose a long-term environmental risk, with the only potential issue being asbestos-containing materials in the shingles.

3.12.2 Environmental Consequences

3.12.2.1 No Action Alternative

Under the No Action Alternative, no impacts on hazardous materials and waste would occur because no construction or other change to the land would take place.

3.12.2.2 Proposed Action

Minimal hazardous materials and waste impacts could occur as a result of the Proposed Action. Building materials used in the construction of the facility would be free of asbestos-containing materials and lead-based paint. All building materials used would be verified as asbestos-free based on the manufacturer's technical specification sheet or material safety data sheet.

Construction of the ICE facility would require heavy machinery and the use of POL. A limited amount of hazardous materials and waste, including POL, would be used or generated during routine maintenance and operation of any facilities constructed on the site. All hazardous and regulated wastes and substances generated during construction would be collected, characterized, labeled, stored, transported, and disposed of in accordance with all Federal, state, and local regulations, including proper waste manifesting procedures through the Fort Bliss Hazardous Waste Management Program, known as Curbside. Use of Curbside would be required as a design feature of the facility. All other hazardous and regulated materials or substances would be handled according to materials safety data sheet instructions. The potential impacts of the handling and disposal of hazardous and regulated materials and substances during project implementation would be minor when BMPs are implemented and would not impact the public, groundwater, or the general environment.

3.13 Utilities Infrastructure

3.13.1 Affected Environment

Potable water. Potable water would be provided by the EPWU. Water sources include groundwater and surface water from the Rio Grande. During the winter, groundwater is used to meet the city's water needs. Surface water from the Rio Grande is the primary water source in the spring, summer, and early fall, although groundwater is used to meet water needs in some areas that are further from the Rio Grande and to augment summer needs, particularly in drought years. Together the surface and groundwater sources bring summer capacity to approximately 300 million gallons per day (MGD). Daily average water demand in 2011 was 106 MGD, with maximum daily demand of 163.5 MGD (EPWU 2012). The EPWU operates and maintains a 30-inch diameter water main that extends along the south side of Montana Avenue.

Wastewater. EPWU has four wastewater treatment facilities and in 2011 had total treatment capacity of 93.5 MGD. Average use in 2011 was 61.5 MGD, with maximum daily use of 68.1 MGD (EPWU 2012). Wastewater would be handled by EPWU by tying into mains located across Montana Avenue.

Stormwater. Stormwater is water on the land surface that originates from precipitation. Due to low precipitation, undulating topography, and exposed soils, most of the precipitation in the region becomes stormwater runoff. Stormwater that does not soak into the ground runs off the land to adjacent lower areas, most of which are undeveloped. Stormwater detention basins will be constructed around the ICE facility to capture runoff from the development.

Solid Waste Management. The City of El Paso's Environmental Services Department provides weekly residential garbage and recycling collection, landfill disposal services, and special collection services for households in the city. Commercial entities are required to contract for garbage services through a private contractor.

Electricity and Natural Gas. Electrical power is supplied by El Paso Electric (EPE) through a 115-kilovolt (kV) line that services Fort Bliss, the City of El Paso, and military reservations and the public to the north. Electrical distribution lines run along the north side of Montana Avenue and an EPE easement extends along the eastern side of the proposed ICE facility. Natural gas is

supplied by the El Paso Natural Gas Company (EPNG) through lines owned and maintained by Texas Gas Services (U.S. Army 2010). A 6-inch natural gas main runs along the south side of Montana Avenue.

Communications. A number of large and small fiber-optic Internet service providers serve clients in and around El Paso. Fiber-optic cable communications would be obtained through a private contractor.

3.13.2 Environmental Consequences

3.13.2.1 No Action Alternative

Under the No Action Alternative, no impacts on utilities infrastructure would occur because no construction or other changes to the land would take place.

3.13.2.2 Proposed Action

The ICE facility would obtain water, sewer, natural gas, and electric power services from city and private providers, as appropriate. These services are available along Montana Avenue. Impacts would be within the existing utility servitudes. Secure fiber-optic lines would be obtained from a private contractor. Three detention basins would be constructed around the perimeter of the site to control stormwater runoff from at least a 100-year storm event. No stormwater would flow onto Montana Avenue from the proposed facility (see Figure 2-1). All stormwater would be subject to Section 438 of the EISA.

All of these utilities are currently being provided at the seven existing ICE locations in El Paso, and the number of personnel in the El Paso area would remain the same. As a result, the consolidation of ICE functions at the new facility would not cause a net change in demand for utilities.

3.14 Socioeconomics

3.14.1 Affected Environment

This socioeconomics section outlines the basic attributes of population and economic activity within in the Fort Bliss region, El Paso County, Texas.

3.14.1.1 Population

Population data for El Paso County, Texas, are shown in Table 3-8. El Paso County is the only county in the El Paso Metropolitan Statistical Area (MSA). El Paso County, like the state of Texas, grew rapidly (almost 18 percent) over the last decade. The Nation as a whole experienced a much lower growth rate of 9.7 percent from 2000-2010.

Table 3-8. Population for El Paso, Texas

	El Paso County	Texas
2010 Population	800,647	25,145,561
2000 Population	679,622	20,851,820
Percent Change	17.8	20.6

Source: U.S. Census Bureau, 2000 and 2010a

According to the 2010 Census, more than 82 percent of El Paso County's population reports being of Hispanic or Latino origin, with 13 percent reporting "white, not Hispanic," and 3 percent black. More than 26 percent of the population of El Paso County is foreign born, and almost 75 percent of persons age 5 and above report speaking a language other than English at home. As shown in Table 3-9, American Community Survey (ACS) estimates (2006-2010) show that El Paso County has a lower percentage of high school and college graduates than the State of Texas and the Nation.

Table 3-9. Educational Attainment

Persons Age 25+	El Paso County	Texas	U.S.
High school graduates	71.0%	80.0%	85.0%
Bachelor's degree or higher	19.3%	25.8%	27.9%

Source: U.S. Census Bureau 2010b

3.14.1.2 Income and Poverty

Income and poverty data are shown in Table 3-10. Per capita income for El Paso County is well below the U.S. average per capita income. Median household incomes are also below the U.S. average (U.S. Bureau of Economic Analysis [BEA] 2009). The poverty rate for El Paso County is estimated to be 25.6 percent, almost double the National poverty rate of 13.8 percent (U.S. Census Bureau 2010b).

Table 3-10. Income and Poverty

	El Paso County	City of El Paso	Texas	U.S.
Per capita personal income (dollars), 2009	$29,381	NA	$38,601	$39,635
Per capita income as a percent of U.S., 2009	74.1%	NA	97.4%	100%
Median Household Income (2006-2010)	$36,333	$37,428	$49,646	$51,914
Persons of all ages below poverty level, percent, 2006-2010	25.6%	24.1%	16.8%	13.8%

Sources: U.S. Census Bureau 2010b and BEA 2009
NA – Not available

3.14.1.3 Housing

Data on housing units in El Paso County, the State of Texas, and the Nation are presented in Table 3-11. These data indicate that housing is in high demand in El Paso County. El Paso has a rate of renter-occupied housing (37 percent) that is higher than Texas (36.3 percent) and noticeably higher than the Nation (34.9 percent). The homeowner and rental vacancy rates for El Paso County are well below the rates for Texas and the Nation, with the rental vacancy rate of 4.4 percent being less than half of those rates for Texas (10.8 percent) and the Nation (9.2 percent).

Table 3-11. Housing Units

Geographic Area	Total Housing Units	Occupied			Homeowner Vacancy Rate* (Percent)	Rental Vacancy Rate** (Percent)	Vacant Units for Rent
		Units	Owner-Occupied (Percent)	Renter-Occupied (Percent)			
El Paso County	270,307	256,557	63.0	37.0	1.6	4.4	4,361
State of Texas	9,977,436	8,922,933	63.7	36.3	2.1	10.8	394,310
U.S.	131,704,730	116,716,292	65.1	34.9	2.4	9.2	4,137,567

Source: U.S. Census Bureau 2010a
*Homeowner vacancy rate is the proportion of the homeowner inventory that is vacant "for sale."
** Rental vacancy rate is the proportion of the rental inventory that is vacant "for rent."

3.14.1.4 Labor Force and Employment

The estimated civilian labor force in El Paso County in October 2011 was 326,400. The unemployment rate was 10.2 percent, which is well above the 8.4 percent unemployment rate for the State of Texas but is a decrease from the 10.9 percent in El Paso County reported in June and July (U.S. Bureau of Labor Statistics 2011). County Business Patterns data show that employment in El Paso County is concentrated in the "retail," "healthcare and social assistance," and "accommodation and food services" categories. Together they account for approximately 45 percent of employment in El Paso County, compared to 37 percent for Texas and 38 percent for the Nation.

3.14.2 Environmental Consequences

3.14.2.1 No Action Alternative

Under the No Action Alternative, no impacts on socioeconomics would occur because no construction or other change to the land would take place.

3.14.2.2 Proposed Action

The ICE administration building would consolidate seven ICE offices around El Paso into one facility. This shift in office locations would have negligible permanent impacts on population, income, employment, and housing. However, short-term indirect adverse impacts would occur as a result of the seven leased facilities no longer being occupied by the ICE employees. Income to the lessors and taxes paid by the lessors would be adversely impacted until the new leases could be acquired. Temporary beneficial impacts in the form of construction jobs and from the local purchase of construction materials would be expected from construction expenditures.

3.15 Environmental Justice and Protection of Children

3.15.1 Affected Environment

3.15.1.1 Environmental Justice

EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, was issued by President Clinton on February 11, 1994. It was intended to ensure that proposed Federal actions do not have disproportionately high and adverse human health and environmental effects on minority and low-income populations and to ensure greater

public participation by minority and low-income populations. It requires each agency to develop an agency-wide environmental justice strategy. A Presidential Transmittal Memorandum issued with the EO states that "each Federal agency shall analyze the environmental effects, including human health, economic and social effects, of Federal actions, including effects on minority communities and low-income communities, when such analysis is required by the NEPA 42 USC section 4321, et seq."

EO 12898 does not provide guidelines as to how to determine concentrations of minority or low-income populations. However, analysis of demographic data on race and ethnicity and poverty provides information on minority and low-income populations that could be affected by proposed actions. The 2010 Census reports numbers of minority individuals, and the ACS provides the most recent poverty estimates available. Minority populations are those persons who identify themselves as Black, Hispanic, Asian American, American Indian/Alaskan Native, Pacific Islander, or Other. Poverty status is used to define low-income. Poverty is defined as the number of people with income below poverty level, which was $22,314 for a family of four in 2010, according to the U.S. Census Bureau. A potential disproportionate impact may occur when the percent minority in the study area exceeds 50 percent and/or the percent low-income exceeds 20 percent of the population. Additionally, a disproportionate impact may occur when the percentage of minority and/or low-income in the study area is meaningfully greater than those in the region.

The population of El Paso County and the City of El Paso is largely minority (primarily Hispanic) and low-income, as shown in Table 3-12. According to the 2010 Census, El Paso County is approximately 86.9 percent minority and has 25.6 percent of the population living below the poverty level. Census Tract 103.22, immediately south of the location of the proposed ICE administrative facility, is also primarily minority (Hispanic), and as of the 2010 Census, 19.5 percent of the population was living below the poverty level.

Table 3-12. Minority and Poverty

Location	Minority Population (Percent)	All Ages in Poverty (Percent)
El Paso County	86.9	25.6
City of El Paso	85.8	24.1
Census Tract 103.22	82.1	19.5

Source: U.S. Census Bureau 2010a and 2010b

3.15.1.2 Protection of Children

EO 13045 requires each Federal agency "to identify and assess environmental health risks and safety risks that may disproportionately affect children" and "ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks." This EO was prompted by the recognition that children, still undergoing physiological growth and development, are more sensitive to adverse environmental

health and safety risks than adults. The potential for impacts on the health and safety of children is greater where projects are located near residential areas.

3.15.2 Environmental Consequences

The Proposed Action would be located in El Paso County, which has a population that is more than 86 percent minority and more than 25 percent low-income. Approximately 30 percent of the population consists of persons under 18 years of age, and 8.1 percent consists of persons under age 5 (U.S. Census Bureau 2010a and 2010b).

3.15.2.1 No Action Alternative

Under the No Action Alternative, no impacts on minority or low-income populations or children would occur because no construction or other changes to the land would take place.

3.15.2.2 Proposed Action

While the El Paso County population is high minority and low-income and Census Tract 103.22, which is immediately south of the proposed administrative facility, is high minority, shifting employees from the seven locations to one is not expected to result in disproportionate adverse impacts on minority or low-income populations in the region or the area around the proposed facility. Current ICE facilities are located nearby and commuting distances would not be disproportionately changed. Further, ICE is a law enforcement branch of the Federal government and provides improved security for all residents. However, there could be a temporary loss of income to minority businesses if any of the seven leased properties were minority-owned. These properties are expected to be on the lease market shortly after ICE vacates the structures.

The implementation of the Proposed Action would not cause environmental health risks or safety risks that would disproportionately affect children.

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SECTION 4.0
CUMULATIVE IMPACTS

4.0 CUMULATIVE IMPACTS

Cumulative impacts are defined as the impacts on the environment that result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions. Cumulative impacts of recent U.S. Army initiatives for mandated expansion and construction activities at Fort Bliss are discussed in the SEIS (U.S. Army 2007) and the GFS EIS (U.S. Army 2010).

The issuance of a renewable permit and development of the 19-acre parcel by ICE has the potential for cumulative impacts on land use, biological resources, air quality, noise, and transportation. A number of areas in the region around the proposed ICE facility area are proposed for development. These areas include parcels to the west, north, and east of the proposed ICE facility that are currently being considered for sale and a land swap deal between Fort Bliss and the TxGLO, as well as an area being considered for a gun range on Fort Bliss. These impacts were assessed in the 2007 SEIS and 2010 GFS EIS that changed land use of Army land north of Montana Avenue from open training to development of facilities including housing, light industrial, and commercial type uses (U.S. Army 2007, 2010). Cumulative impacts from the proposed developments in the region include permanent, minor impacts on land use and aesthetics, soils, and biological resources.

There would be long-term, minor cumulative impacts on land use and aesthetics as undeveloped and undisturbed lands north of Montana Avenue would be developed. However, the proposed land uses are consistent with land use zoning in the area, and the loss or degradation of this land is minimal in comparison to the amount of similar lands available in the region and on Fort Bliss. The planned developments would also detract from the aesthetic and visual qualities of the landscape. As a result, minor cumulative impacts would occur on land use and aesthetics. BMPs, as described in a SWPPP that would be developed for all of the proposed projects in the area, would minimize soil loss during and after construction, so there would be minimal cumulative impacts on soils.

Potential cumulative impacts on biological resources as a result of the loss of vegetation and wildlife habitat would be considered permanent but minor because of the low quality of the habitat for wildlife and similar vegetation communities at and near the proposed site and throughout Fort Bliss and the region. Some sensitive species may be minimally impacted. Private development on adjacent parcels could potentially impact Texas horned lizards and nesting migratory birds, which could lead to a minor cumulative impact on sensitive species.

A major cumulative long-term adverse impact in the region would occur from the additional traffic expected as a result of development of areas along Montana Avenue that, in addition to the proposed ICE facility, are expected to be developed as a mixture of residential and mixed-use commercial development. The additional vehicles from this development would further reduce the LOS on Montana Avenue and cause additional traffic delays during commute hours. However, mitigation strategies are proposed as part of the development to minimize the impacts, including but not limited to redesigning traffic light phasing and timing for optimization, adding new traffic lights, adding turn lanes, and opening new thoroughfares to redistribute traffic.

If the ICE facility were under construction at the same time construction is under way on parcels in the immediate vicinity, there could also be additional construction-related cumulative impacts on traffic, wear and tear on Montana Avenue and other area roadways, noise, and fugitive dust. However, these impacts would be temporary and minor.

SECTION 5.0
SUMMARY OF MITIGATION MEASURES

5.0 SUMMARY OF MITIGATION MEASURES

The following is a summary of the mitigation measures identified under the Proposed Action:

- To minimize impacts on migratory birds, all site preparation between February 15th and September 15th would require a preconstruction survey for bird activity and avoidance of any active nests of migratory birds until all chicks have fledged. Alternatively, all clearing, grubbing, and ground disturbance would be carried out in the fall and winter months to coincide with the non-breeding season for these species.

- Native vegetation would be preserved to the greatest extent practicable when planning and implementing the Proposed Action.

- Preconstruction biological surveys for the Texas horned lizard and burrowing owl are recommended to detect their presence and provide for reducing impacts on these species.

- If any subsurface cultural resources are encountered during the construction of the proposed buildings, they would be properly mitigated in accordance with the PA between Fort Bliss and the Texas SHPO. Any discovery of possible human remains would be treated in accordance with the NAGPRA and the SOPs set forth in the Fort Bliss ICRMP.

- Drip pans would be provided for stationary construction equipment to capture any POL accidentally spilled during construction activities. The SPCCP and ISCP would be followed for any POL spills. All hazardous and regulated wastes and substances generated during construction would be collected, characterized, labeled, stored, transported, and disposed of in accordance with all Federal, state, and local regulations, including proper waste manifesting procedures through the Fort Bliss Hazardous Waste Management Program's Curbside service. Access for the Curbside service would be required as a design feature of the facility. Solid waste would be separated into recyclable and non-recyclable, collected on-site in appropriate containers, and disposed of at an approved disposal facility for the type of waste.

- Construction stormwater permitting would be obtained through the TCEQ NPDES process as required under the CWA. A SWPPP would be developed and implemented to prevent stormwater runoff during and following construction. BMPs following Fort Bliss SWPPP guidance would be utilized to control temporary fugitive dust and erosion during construction. All stormwater would be subject to Section 438 of the EISA.

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SECTION 6.0
REFERENCES

6.0 REFERENCES

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SECTION 7.0
LIST OF PREPARERS

7.0 LIST OF PREPARERS

The following people were primarily responsible for preparing this Environmental Assessment.

Name	Agency/Organization	Discipline/ Expertise	Experience	Role in Preparing EA
Eric Webb, PhD	Gulf South Research Corporation	Biological resources and environmental planning	18 years natural resources and NEPA Studies	Project Manager; EA review and comment; Meetings and coordination
Ann Guissinger	Gulf South Research Corporation	Economics	31 years economic studies and economic development	EA Preparation, Socioeconomics, Environmental Justice, Traffic, Land Use and Aesthetics, Utilities
Steve Oivanki	Gulf South Research Corporation	Geology	20 years natural resources and NEPA studies	EA review
Bretton Somers, PhD	Gulf South Research Corporation	Principal Investigator, Cultural Resources	4 years archaeological studies	Cultural Resources
Steve Kolian	Gulf South Research Corporation	Environmental science	14 years natural resources	Noise and Air Quality
Liz Ayarbe-Perez	Gulf South Research Corporation	GIS/Graphics	5 years GIS/graphics experience	GIS analysis and graphics
Mark Walker	Gulf South Research Corporation	Forestry/Natural Resource Management	30 years natural resources and NEPA studies	EA review and comment
John Barrera	Fort Bliss Directorate of Public Works - Environmental Division	NEPA Program Manager	20 years NEPA studies	Fort Bliss Project Manager; EA review and comment
John Kipp	Fort Bliss Environmental Division, NEPA Planner	Soil science, Geomorphology	25 years earth science and NEPA studies	Fort Bliss Project Manager; EA review and comment

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SECTION 8.0
ACRONYMS AND ABBREVIATIONS

8.0 ACRONYMS AND ABBREVIATIONS

ACS	American Community Survey
AFRC	Armed Forces Reserve Center
ARPA	Archeological Resources Protection Act
BAAF	Biggs Army Airfield
BEA	Bureau of Economic Analysis
BMP	Best Management Practice
Caltrans	California Department of Transportation
CEQ	Council on Environmental Quality
CFC	Chlorofluorocarbons
CFR	Code of Federal Regulations
CH_4	Methane
CO	Carbon monoxide
CO_2	Carbon dioxide
CO_2e	Carbon dioxide equivalency
CWA	Clean Water Act
dB	Decibel
dBA	A-weighted decibel
DHS	Department of Homeland Security
DNL	Day-night average sound level
DPW-E	Directorate of Public Works-Environmental Division
DRO	Detention and Removal Operations
EA	Environmental Assessment
EIS	Environmental Impact Statement
EISA	Energy Independence and Security Act
EO	Executive order
EPE	El Paso Electric
EPNG	El Paso Natural Gas
EPWU	El Paso Water Utilities
ESA	Endangered Species Act
FBTC	Fort Bliss Training Complex
FHWA	Federal Highway Administration
FNSI	Finding of No Significant Impact
GFS EIS	Growth and Force Structure Realignment Final EIS
GHG	Greenhouse gases
GIS	Geographic Information System
GMI	Geo-Marine Incorporated
GSA	General Services Administration
GSRC	Gulf South Research Corporation
HFC	Hydrochlorofluorocarbons
HUD	U.S. Department of Housing and Urban Development
I-10	Interstate 10
ICE	Immigration and Customs Enforcement
ICRMP	Integrated Cultural Resources Management Plan
ISCP	Installation Spill Contingency Plan

kV	Kilovolt
LEED	Leadership in Energy and Environmental Design
LINRs	Locally Important Natural Resources
LOS	Level(s) of service
MBTA	Migratory Bird Treaty Act
Mg/m^3	Milligrams per cubic meter
MGD	Million gallons per day
MMP EIS	Mission and Master Plan, Programmatic EIS
MSA	Metropolitan Statistical Area
N_2O	Nitrous oxide
NA	Not available
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NOA	Notice of availability
NO_2	Nitrogen dioxide
NO_x	Nitrogen oxides
NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places
O_3	Ozone
OSHA	Occupational Safety and Health Administration
PA	Programmatic Agreement
PL	Public Law
PM	Particulate matter
PM-2.5	Particulate matter less than 2.5 microns
PM-10	Particulate matter less than 10 microns
POL	Petroleum, oil, and lubricants
ppb	Parts per billion
ppm	Parts per million
ROW	Right-of-way
SEIS	Supplemental Environmental Impact Statement
SHPO	State Historic Preservation Officer
SO_2	Sulfur dioxide
SOP	Standard operation procedures
SPCCP	Spill Prevention, Control, and Countermeasures Plan
SWPPP	Stormwater Pollution Prevention Plan
TCEQ	Texas Commission on Environmental Quality
THC	Texas Historical Commission
TPWD	Texas Parks and Wildlife Department
TxGLO	Texas General Land Office
U.S.	United States
USACE	U.S. Army Corps of Engineers
USC	U.S. Code
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency

USFWS	United States Fish and Wildlife Service
UTEP	University of Texas El Paso
VOC	Volatile organic compounds
VPD	Vehicles per day
VPH	Vehicles per hour
$\mu g/m^3$	Micrograms per cubic meter

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APPENDIX A
DISTRIBUTION LIST AND INTERAGENCY AND PUBLIC CORRESPONDENCE

DISTRIBUTION LIST

Libraries

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501 N. Oregon St.
El Paso, TX 79901

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El Paso, TX 79968

Martha Herrera
Branch Manager
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Texas Commission of Environmental Quality
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Eddie Arellano
Texas Department of Transportation, APD Section
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El Paso, TX 79928

El Paso County

The Hon. Veronica Escobar
County Judge
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El Paso, TX 79901

Anna Perez
Commissioner, Precinct #1
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El Paso, TX 79901

Sergio Lewis
Commissioner, Precinct #2
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Tania M. Chozet
Commissioner, Precinct #3
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El Paso, TX 79901

Daniel Haggerty
Commissioner, Precinct #4
500 E. San Antonio, Suite 301
El Paso, TX 79901

NOTICE OF AVAILABILITY
Draft Finding Of No Significant Impact
Environmental Assessment for the
Immigration and Customs Enforcement
El Paso City Administrative Facility
Fort Bliss, Texas

The Army and the Department of Homeland Security (DHS) - Immigration and Customs Enforcement (ICE) announce the availability of an Environmental Assessment (EA) that analyzes the construction and operation of an administrative facility on 19-acres fronting Montana Avenue, west of the existing Armed Forces Reserve Center within Fort Bliss, Texas. The Army intends to issue a long term lease to the DHS for the facility. The EA has resulted in a Draft Finding of No Significant Impact (FNSI), as ICE will consult with the City of El Paso and the Texas Department of Transportation during the design phase to address potential traffic impacts in the area. The proposed facility would house approximately 500 employees currently working at seven different facilities located throughout El Paso, Texas. The leases on the seven facilities currently used by ICE would be terminated and those functions consolidated at the new facility. No high risk activities would occur at the new facility. Both the EA and Draft FNSI are available for public review and comment at the El Paso Main Public Library, the Irving Schwartz Branch Library, and the UTEP Library. They can also be viewed on the following websites: www.bliss.army.mil; click on "Environmental" and http://ecso.swf.usace.army.mil/Pages/Publicreview.cfm.

The public is encouraged to review and comment on these documents. Submittal of public comments must be received no later than 30 days from today and can be submitted by e-mail at john.f.barrera.civ@mail.mil, or mailed to: Mr. John F. Barrera, NEPA Program Manager, IMBL-PWE, B624 Pleasonton Avenue, Fort Bliss, Texas 79916-6812.

NOTIFICACION DE DISPONIBILIDAD

Borrador de la Declaratoria de
Impacto No Significativo del Estudio Ambiental para las
Instalaciones Administrativas de Inmigración y Aduanas de la
Ciudad de El Paso en Fort Bliss, Texas

El Ejército y el Department of Homeland Security (DHS) - Immigration and Customs Enforcement (ICE) están anunciando la disponibilidad de un Estudio Ambiental que analiza la construcción y operación de una instalación administrativa en un lote de 19 acres frente a la Avenida Montana, al oeste del existente Centro de las Reservas de las Fuerzas Armadas dentro de Fort Bliss, Texas. El Ejercito intenta emitir un documento de renta a largo plazo a favor de la DHS para esta instalación. El análisis del Estudio Ambiental ha resultado en la preparación de un borrador de declaratoria de Impacto no Significativo (FNSI, por sus siglas en inglés), mientras que ICE consultará con la Ciudad de El Paso y el Departamento de Transportes de Texas durante la fase de diseño para abordar impactos potenciales de tráfico en el área. La instalación propuesta albergara aproximadamente a 500 empleados, quienes en el presente se encuentran trabajando en siete diferentes localidades de la Ciudad de El Paso, Texas. Las rentas en esas siete instalaciones actualmente usadas por ICE serían terminadas y esas funciones serian consolidadas en la nueva instalación. Se anticipa que no ocurrirán actividades de alto riesgo en esa nueva instalación. Ambos documentos, el Estudio Ambiental y el borrador del FNSI están disponibles para su revisión y comentarios del público en El Paso Main Public Library, Irving Schwartz Branch Library y UTEP Library. También se pueden consultar en los sitios: www.bliss.army.mil seleccione y presione "Environmental Public Documents" y http://ecso.swf.usace.army.mil/Pages/Publicreview.cfm

Se invita al público a que revise los documentos y proporcione comentarios. La Recepción de comentarios tiene que ser antes de 30 días a partir de esta fecha y pueden enviarse por correo electrónico a: john.f.barrera.civ@mail.mil o por correo normal a: John J. Barrera, NEPA Program Manager, IMBL-PWE, B624 Pleasonton Avenue, Fort Bliss, Texas 79916-6812.

GULF SOUTH RESEARCH CORPORATION

8081 GSRI AVE
BATON ROUGE, LA 70820

AD # 0000731043

LINES 49
COST: $724.38

PUBLISHERS AFFIDAVIT

STATE OF TEXAS
COUNTY OF EL PASO

Before me, a Notary in and for El Paso County, State of Texas, on this day personally, appeared JOE WOODS who states upon oath that he is the ASSISTANT CLASSIFIED MANAGER of the EL PASO TIMES, a daily newspaper published in the City and County El Paso, State of Texas, which is a newspaper of general circulation and which has been continuously and regularly published for the period of not less than one year in the said County of El Paso, and that she was upon the dates herein mentioned in the EL PASO TIMES.

That the PUBLIC NOTICE copy was published in the EL PASO TIMES for the date(s) of such follows 1 DAY(s) to wit SEPTEMBER 30, 2012.

Signed _____

BELIA DUENES
MY COMMISSION EXPIRES
March 19, 2016

Subscribed and sworn to before me,
This 16th day of October 16, 2012.

_____

ALTERNATIVE LANGUAGE AFFIDAVIT OF PUBLICATION

STATE OF TEXAS §

COUNTY OF El Paso §

Before me, the undersigned authority, on this day personally appeared

Minerva Macias, who being by me duly sworn, deposes
(name of newspaper or publication representative)

and says that (s)he is the Account Executive
(title of newspaper representative)

of the El Diario; that said newspaper or publication is
(name of newspaper or publication)

generally circulated in El Paso, Texas;
(municipality in which the site or proposed site is located)

that the attached notice was published in said newspaper or publication on the following date(s):

September 30, 2012

(newspaper or publication representative's signature)

Subscribed and sworn to before me this the 1 day of Oct, 20 12.

to certify which witness my hand and seal of office.

Notary Public in and for the State of Texas

(Seal)

Silvia Diaz
Print or Type Name of Notary Public

12/13/2014
My Commission Expires

NOTARY PUBLIC STATE OF TEXAS
Silvia Diaz
My Commission Expires
12/13/2014

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Dick Scott
Wimberley

Lee M. Bass
Chairman-Emeritus
Fort Worth

Carter P. Smith
Executive Director

October 24, 2012

Mr. John F. Barrera
NEPA Program Manager
Department of the Army
Bldg. 624S Taylor Rd.
Fort Bliss, TX 79916

RE: Environmental Assessment (EA) and Draft Finding of No Significant Impact for the Immigration and Customs Enforcement (ICE) El Paso Administrative Facility, Fort Bliss, Texas

Dear Mr. Barrera:

Texas Parks and Wildlife Department (TPWD) reviewed the EA and Draft Finding of No Significant Impact for the ICE El Paso Administrative Facility located in Fort Bliss, Texas, and would like to offer the following information, comments, and recommendations.

Please be aware that a written response to a TPWD recommendation or informational comment received by a state governmental agency may be required by state law. For further guidance, see the Texas Parks and Wildlife Code, Section 12.0011, which can be found online at http://www.statutes.legis.state.tx.us/Docs/PW/htm/PW.12.htm#12.0011. For tracking purposes, please refer to TPWD project number ERCS-3047 in any return correspondence regarding this project.

Project Description

The Proposed Action is for Fort Bliss to issue a renewable permit (i.e., a long-term lease) to ICE and for ICE to construct, operate, and maintain one or more buildings totaling approximately 90,000 square feet on an approximately 19-acre site within Fort Bliss in El Paso, Texas. The site fronts Montana Avenue and is located along the west side of the Armed Forces Reserve Center. The proposed facility would house approximately 500 employees currently working in seven facilities around El Paso. The leases on the seven facilities currently used by ICE would be terminated.

Impacts to Vegetation/Wildlife Habitat

Section 3.5.1 of the EA states the proposed ICE administration building would be located on approximately 19 acres of mesquite coppice dune habitat, typical of the northern Chihuahuan Desert. The parcel is dominated by honey mesquite

4200 SMITH SCHOOL ROAD
AUSTIN, TEXAS 78744-3291
512.389.4800
www.tpwd.state.tx.us

(*Prosopis glandulosa*). Other vegetation found on the parcel are four-wing saltbush (*Atriplex canescens*), broom snakeweed (*Gutierrezia sarothrae*), and various annual forbs.

Recommendation: TPWD recommends avoiding impacts to native vegetation to the greatest extent possible. Conserving native vegetation would provide the greatest benefit overall to the existing wildlife.

Invasive species pose a significant threat to the existence of native plant communities in disturbed areas. In accordance with the ***Executive Order on Invasive Species (EO 13112)*** and the ***Executive Memorandum on Beneficial Landscaping***, TPWD recommends that practices be implemented to prevent the establishment of invasive species and sustain existing native species, particularly during the early stages of revegetation. Lists of invasive species to avoid planting can be accessed online at http://texasinvasives.org/invasives_database/. The Lady Bird Johnson Wildflower Center's ***Native Plant Alternatives to Invasives*** database can be accessed at http://www.wildflower.org/ alternatives/index.php.

For projects that incorporate revegetation or landscape planning, the ***TPWD Texas Wildscapes*** website has information about selecting native plants that would be best suited for the particular area. Information on ***Texas Wildscapes*** (including how to obtain a free copy of an interactive Texas Wildscapes DVD) is available at http://www.tpwd.state.tx.us/huntwild/wild/wildscapes/. Additional sources include the TPWD ***Texas Plant Information Database*** at http://tpid.tpwd.state.tx.us/ and the Lady Bird Johnson Wildflower Center's ***Recommended Native Plants*** database at http://www.wildflower.org/collections/.

Federal Laws

Migratory Bird Treaty Act

Section 3.5.2 of the EA states that bird species protected by the Migratory Bird Treaty Act (MBTA) may be minimally impacted as a result of the proposed action.

The MBTA prohibits taking, attempting to take, capturing, killing, selling/purchasing, possessing, transporting, and importing of migratory birds, their eggs, parts and nests, except when specifically authorized by the Department of the Interior. This protection applies to most native bird species, including ground nesting species. El Paso County is located within the Central Flyway for

migratory birds. Many bird species nest in the general area during the spring and summer. Fall and spring migrants use the region for temporary stops during travel between the northern and southern hemispheres.

Recommendation: TPWD recommends that best management practices for avoiding harassment and harm to migratory birds be implemented. In accordance with the MBTA, TPWD recommends that vegetation removal and ground disturbing activities be phased to occur outside of the nesting season (March 15 to September 15) and impacts to spring and fall migrants be avoided. Construction noise that could harass nesting birds should be phased to occur outside of the nesting season as well. Additional information regarding the MBTA may be obtained through the U.S. Fish and Wildlife Service (USFWS) Region 2 Migratory Bird Permit Office at (505) 248-7882 or online at http://www.fws.gov/birds/Permits-Fact-Sheet.pdf.

State Laws

State-listed Species

Section 68.015 of the Parks and Wildlife Code regulates state-listed species. Please note that there is no provision for take (incidental or otherwise) of state-listed species. A copy of *TPWD Guidelines for Protection of State-Listed Species*, which includes a list of penalties for take of species, is attached for your reference. State-listed species may only be handled by persons with a scientific collection permit obtained through TPWD. For more information on this permit, please contact the Wildlife Permits Office at (512) 389-4647.

Section 3.5.1 of the EA states the Texas horned lizard (*Phrynosoma cornutum*), a state-listed threatened species, has the potential to occur within the project area. TPWD would also like to point out that suitable habitat for the Mountain short-horned lizard (*Phrynosoma hernandesi*), a state-listed threatened species, may also be present within the project area.

If present on site, both the Mountain short-horned lizard and the Texas horned lizard could be impacted by ground disturbing activities from construction and training activities. Horned lizards may hibernate on site in the loose soils few inches below ground during the cool months from September/October to March/April. Construction in these areas could harm hibernating lizards. Horned lizards are active above ground when temperatures exceed 75 degrees Fahrenheit. If horned lizards (nesting, gravid females, newborn young, lethargic from cool temperatures or hibernation) cannot move away from noise and approaching construction equipment in time, they could be affected by construction activities.

Recommendation: TPWD recommends that a pre-construction survey be conducted to determine if horned lizards are present on site. A useful indication that Texas horned lizard may occupy the site is the presence of Harvester Ant (*Pogonomyrmex barbatus*) nests since Harvester Ants are the primary food source of horned lizards. The survey should be performed during the warm months of the year when the horned lizards are active. Fact sheets, including survey protocols and photos of the Texas horned lizard may be found online at http://www.tpwd.state.tx.us/learning/texas_nature_trackers/horned_lizard/ and at http://www.tpwd.state.tx.us/huntwild/wild/species/thlizard/.

If horned lizards are found on site, TPWD recommends contacting this office to develop plans to relocate them, particularly if there is likelihood that they would be harmed by project activities.

Species of Concern

The EA does not address rare species on the ***TPWD Annotated List of Rare Species for El Paso County*** (attached). In addition to state- and federally-protected species, TPWD tracks special features, natural communities, and rare resources that are not listed as threatened or endangered. These species and communities are tracked in the Texas Natural Diversity Database (TXNDD), and TPWD actively promotes their conservation. TPWD considers it important to evaluate and, if necessary, minimize impacts to rare species and their habitat to reduce the likelihood of endangerment.

Based on the project description, site location, a review of the TXNDD, and publicly-available aerial photographs, the following species of concern could be impacted as a result of the proposed project:

Wheeler's spurge (*Chamaesyce geyeri var. wheeleriana*)

Two TXNDD records for the Wheeler's spurge are located within the proposed project limits. A printout of these occurrence records is attached for your reference.

Recommendation: TPWD strongly recommends that the 19 acres of vegetation slated for clearing be surveyed for the Wheeler's spurge where suitable habitat is present. On-the-ground surveys should be performed by a qualified biologist familiar with the identification of this species. Surveys should be conducted when each species is most detectable and identifiable (usually during their respective flowering seasons), and disturbance of this species should be avoided during construction to the extent feasible. If plants are found in the path of construction, this office (512-389-4571) should be

contacted for further coordination and possible salvage of plants and/or seeds for seed banking. Plants not in the direct path of construction should be protected by markers or fencing and by instructing construction crews to avoid any harm.

Although there are no TXNDD records for the following rare species in the project area, suitable habitat may still be present.

Black-tailed prairie dog (*Cynomys ludovicianus*)

The shrubs and grasslands associated with project area may provide suitable habitat for the black-tailed prairie dog.

Recommendation: TPWD recommends that, if not done to date, the project area be surveyed for the rare species and other species on the county list that have potential to occur in the action area. The survey should be performed at the time of year when the species is most likely to be found. If these species are present, plans should be made to avoid adverse impacts to the greatest extent possible. In addition, this TPWD office should be contacted for further guidance.

Western Burrowing Owl (*Athene cunicularia hypugaea*)

Section 3.5.1 of the EA states the Western Burrowing Owl, a species of concern, has the potential to occur within the project area. TPWD notes that the MBTA protects not only migratory birds but also their eggs and nests and requires that eggs be hatched and young birds be fledged before nests can be removed.

Recommendation: If mammal burrows or other suitable habitat would be disturbed as a result of the proposed project, TPWD recommends they be surveyed for burrowing owls. If nesting owls are found, disturbance should be avoided until the eggs have hatched and the young have fledged.

Recommendation: TPWD requests that Department of the Army address potential impacts to rare species that are included on the Annotated County List of Rare Species for the project county. If potential impacts are identified, TPWD requests that Department of the Army incorporate actions into the project to minimize impacts to these species.

Section 3.5.1 of the EA states "On Fort Bliss, 61 sensitive species of flora and fauna are known to occur or have the potential to occur, of which 31 have Federal special status. Seven are listed as threatened or endangered under the ESA, and one is a candidate for listing. The remaining 23 are listed as species of concern. In addition to those Federally listed species and special status species, seven are

listed as Texas threatened animals, and five are listed as endangered animals in the state. While most of these species are known to occur on Fort Bliss land, the probability of these species occurring within the 19-acre site proposed for development is low due to the lack of suitable habitat."

The EA does not address when or if an on-the-ground biological survey was performed by a qualified biologist to determine the presence, absence, or probability of suitable habitat for any of the above mentioned species that are known to occur or have the potential to occur on Fort Bliss.

> **Recommendation:** TPWD would like to point out that before a determination can be made as to whether the project would affect species or resources, the evaluation would have to be carried further with on-the-ground surveys for potential habitat and species. TPWD recommends that an on-the-ground survey be performed by a qualified biologist if one has not been performed to date.

I appreciate the opportunity to review and comment on this project. Please contact me at (512) 389-8054 or by email at jessica.schmerler@tpwd.state.tx.us if you have any questions.

Sincerely,

Jessica Schmerler

Jessica Schmerler
Wildlife Habitat Assessment Program
Wildlife Division

JES:gg.ERCS-3047

Attachments (3)

Protection of State-Listed Species
Texas Parks and Wildlife Department Guidelines

Protection of State-Listed Species

State law prohibits any take (incidental or otherwise) of state-listed species. State-listed species may only be handled by persons possessing a **Scientific Collecting Permit** or a **Letter of Authorization** issued to relocate a species.

- **Section 68.002 of the Texas Parks and Wildlife (TPW) Code** states that species of fish or wildlife indigenous to Texas are endangered if listed on the United States List of Endangered Native Fish and Wildlife or the list of fish or wildlife threatened with statewide extinction as filed by the director of Texas Park and Wildlife Department. Species listed as Endangered or Threatened by the Endangered Species Act are protected by both Federal and State Law. The State of Texas also lists and protects additional species considered to be threatened with extinction within Texas.

- **Animals** - Laws and regulations pertaining to state-listed endangered or threatened animal species are contained in **Chapters 67 and 68 of the Texas Parks and Wildlife (TPW) Code** and **Sections 65.171 - 65.176 of Title 31 of the Texas Administrative Code (TAC).** State-listed animals may be found at **31 TAC §65.175 & 176.**

- **Plants** - Laws and regulations pertaining to endangered or threatened plant species are contained in **Chapter 88 of the TPW Code and Sections 69.01 - 69.9 of the TAC.** State-listed plants may be found at **31 TAC §69.8(a) & (b).**

Prohibitions on Take of State Listed Species

Section 68.015 of the TPW Code states that no person may capture, trap, take, or kill, or attempt to capture, trap, take, or kill, endangered fish or wildlife.

Section 65.171 of the Texas Administrative Code states that except as otherwise provided in this subchapter or **Parks and Wildlife Code, Chapters 67 or 68,** no person may take, possess, propagate, transport, export, sell or offer for sale, or ship any species of fish or wildlife listed by the department as endangered or threatened.

"Take" is defined in **Section 1.101(5) of the Texas Parks and Wildlife Code** as:

> *"Take," except as otherwise provided by this code, means collect, hook, hunt, net, shoot, or snare, by any means or device, and includes an attempt to take or to pursue in order to take.*

Penalties

The penalties for take of state-listed species (**TPW Code, Chapter 67 or 68**) are:

- 1ST Offense = Class C Misdemeanor:
  $25-$500 fine

- One or more prior convictions = Class B Misdemeanor
  $200-$2,000 fine and/or up to 180 days in jail.

- Two or more prior convictions = Class A Misdemeanor
  $500-$4,000 fine and/or up to 1 year in jail.

Restitution values apply and vary by species. Specific values and a list of species may be obtained from the TPWD Wildlife Habitat Assessment Program.

Element Occurrence Record

Scientific Name:	*Chamaesyce geyeri var. wheeleriana*		**Occurrence #:** 3	**Eo Id:**	8587
Common Name:	Wheeler's spurge		**TX Protection Status:**	**ID Confirmed:**	Y
Global Rank:	G5T2	**State Rank:** S1	**Federal Status:**		

Location Information:

Latitude: 314846N **Longitude:** 1061316W

Watershed Code:	Watershed Description:
13040100	Rio Grande-Fort Quitman

County Code:	County Name:	Mapsheet Code:	Mapsheet Name:	State:
TXELPA	El Paso	31106-G2	Nations South Well	TX
		31106-G3	Fort Bliss SE	TX
		31106-H2	Nations East Well	TX
		31106-H3	Fort Bliss NE	TX
		31106-F2	Clint NW	TX
		31106-F3	Ysleta	TX
		31106-G1	Helms West Well	TX

Directions:

ALONG US ROUTE 62/180, 15-17 MILES EAST OF EL PASO NEAR FOOTHILLS OF HUECO MOUNTAINS

Survey Information:

First Observation:	1942-08-16	**Survey Date:**		**Last Observation:**	1952-07-28
Eo Type:		**EO Rank:**		**EO Rank Date:**	
Observed Area (acres):		**Estimated Representation Accuracy:**			

Comments:

General Description: AMONG SHIFTING SAND DUNES AND IN OTHER SANDY SITUATIONS OF WHAT WARNOCK AND JOHNSTON (1969) CALLED THE JORNADA DEL MUERTO

Comments: COMPLETE SPECIMEN CITATIONS: AMONG SHIFTING SAND DUNES NEAR FOOTHILLS OF HUECO MOUNTAINS, 17 MILES EAST OF EL PASO, 16 AUGUST 1942, U.T. WATERFALL 3900 (GH); AND, IN DEEP SAND ALONG CARLSBAD HIGHWAY CA. 15 MILES EAST OF EL PASO, ALTITUDE 4000 FEET, 28 JULY 1952, B.H. WARNOCK 10900 (SMU, SRSC, TEX); BOTH SPECIMENS CITED IN THE ARTICLE CONTAINING THE TYPE DESCRIPTION (SEE BEST SOURCE)

Protection Comments:

Management Comments:

Data:

EO Data:

Element Occurrence Record

Managed Area:

Managed Area Name: **Managed Area Type:**

Reference:

Full Citation:

WARNOCK, B.H. AND M.C. JOHNSTON. 1969. EUPHORBIA EXSTIPULATA VAR. LATA AND EUPHORBIA GEYERI VAR. WHEELERIANA WARNOCK & JOHNSTON, NEW TAXA FROM WESTERN TEXAS. SOUTHWESTERN NATURALIST 14(1): 127-128.

Specimen:

GRAY HERBARIUM. 1942. U.T. WATERFALL #3900, SPECIMEN # NONE GH.

SOUTHERN METHODIST UNIVERSITY HERBARIUM. 1952. B.H. WARNOCK #10900, SPECIMEN # NONE SMU.

SUL ROSS STATE UNIVERSITY HERBARIUM. 1952. B.H. WARNOCK #10900, SPECIMEN # NONE SRSC.

UNIVERSITY OF TEXAS HERBARIUM. 1952. B.H. WARNOCK #10900, SPECIMEN # NONE TEX.

Associated Species:

Species Name	Type	Comments

Element Occurrence Record

Scientific Name:	*Chamaesyce geyeri var. wheeleriana*		**Occurrence #:** 1	**Eo Id:**	7801
Common Name:	Wheeler's spurge		**TX Protection Status:**	**ID Confirmed:**	Y
Global Rank:	G5T2	**State Rank:** S1	**Federal Status:**		

Location Information:

Latitude: 314807N **Longitude:** 1061850W

Watershed Code:	Watershed Description:
13040100	Rio Grande-Fort Quitman

County Code:	County Name:	Mapsheet Code:	Mapsheet Name:	State:
TXELPA	El Paso	31106-G3	Fort Bliss SE	TX
		31106-F3	Ysleta	TX
		31106-G2	Nations South Well	TX
		31106-G4	El Paso	TX

Directions:

69 MILES WEST OF JUNCTION OF HIGHWAY 180 AND 1437, ON 180

Survey Information:

First Observation:	1972	**Survey Date:**		**Last Observation:**	1972-08-14
Eo Type:		**EO Rank:**		**EO Rank Date:**	
Observed Area (acres):		**Estimated Representation Accuracy:**			

Comments:

General Description: RED SAND HILLS ALONG ROADSIDE

Comments: VERY NEAR EL PASO ON HIGHWAY 180; ORIGINAL SOURCE STATES THAT SPECIES WAS OBSERVED IN HUDSPETH COUNTY

Protection Comments:

Management Comments:

Data:

EO Data: IN FRUIT

Managed Area:

Managed Area Name:	Managed Area Type:
FORT BLISS MILITARY RESERVATION	FDADD

Element Occurrence Record

Reference:

Full Citation:

Specimen:

University of Texas at Austin, Lundell Herbarium. 1972. J.D. Bacon #1408 and R.L. Hartman, Specimen # none TEX-LL. 14 August 1972.

Associated Species:

Species Name	Type	Comments

Code Key for Printouts from
Texas Parks and Wildlife Department
Texas Natural Diversity Database (TXNDD)

This information is for your assistance only; due to continuing data updates, vulnerability of private land to trespass and of species to disturbance or collection, **please refer all requesters to our office to obtain the most current information available.** Also, please note, identification of a species in a given area does not necessarily mean the species currently exists at the point or area indicated.

LEGAL STATUS AND CONSERVATION RANKS

FEDERAL STATUS (as determined by the US Fish and Wildlife Service)

LE	Listed Endangered
LT	Listed Threatened
PE	Proposed to be listed Endangered
PT	Proposed to be listed Threatened
PDL	Proposed to be Delisted (Note: Listing status retained while proposed)
SAE, SAT	Listed Endangered on basis of Similarity of Appearance, Listed Threatened on basis of Similarity of Appearance
DL	Delisted Endangered/Threatened
C	Candidate. USFWS has substantial information on biological vulnerability and threats to support proposing to list as threatened or endangered. Data are being gathered on habitat needs and/or critical habitat designations.
C*	C, but lacking known occurrences
C**	C, but lacking known occurrences, except in captivity/cultivation
XE	Essential Experimental Population
XN	Non-essential Experimental Population
Blank	Species is not federally listed

TX PROTECTION (as determined by the Texas Parks and Wildlife Department)

E	Listed Endangered
T	Listed Threatened
Blank	Species not state-listed

GLOBAL RANK (as determined by NatureServe)

G1	Critically imperiled globally, extremely rare, typically 5 or fewer viable occurrences
G2	Imperiled globally, very rare, typically 6 to 20 viable occurrences
G3	Very rare and local throughout range or found locally in restricted range, typically 21 to 100 viable occurrences
G4	Apparently secure globally
G5	Demonstrably secure globally
GH	Of historical occurrence through its range
GU	Possibly in peril range-wide, but status uncertain
G#G#	Ranked within a range as status uncertain
GX	Apparently extinct throughout range
Q	Rank qualifier denoting taxonomic assignment is questionable
#?	Rank qualifier denoting uncertain rank
C	In captivity or cultivation only
G#T#	"G" refers to species rank; "T" refers to variety or subspecies rank

STATE (SUBNATIONAL) RANK (as determined by the Texas Parks and Wildlife Department)

S1	Critically imperiled in state, extremely rare, vulnerable to extirpation, typically 5 or fewer viable occurrences
S2	Imperiled in state, very rare, vulnerable to extirpation, typically 6 to 20 viable occurrences
S3	Rare or uncommon in state, typically 21 to 100 viable occurrences
S4	Apparently secure in State
S5	Demonstrably secure in State
S#S#	Ranked within a range as status uncertain
SH	Of historical occurrence in state and may be rediscovered
SU	Unrankable – due to lack of information or substantially conflicting information
SX	Apparently extirpated from State
SNR	Unranked – State status not yet assessed
SNA	Not applicable – species id not a suitable target for conservation activities
?	Rank qualifier denoting uncertain rank in State

Revised 1 Apr 2008

ELEMENT OCCURRENCE RECORD

Element Occurrence Record (EOR) Spatial and tabular record of an area of land and/or water in which a species, natural community, or other significant feature of natural diversity is, or was, present and associated information; may be a single contiguous area or may be comprised of discrete patches or subpopulations

Occurrence # Unique number assigned to each occurrence of each element when added to the NDD

LOCATION INFORMATION

Watershed Code Eight digit numerical code determined by US Geological Survey (USGS)

Watershed Name of watershed as determined by USGS

Quadrangle Name of USGS topographical map

Directions Directions to geographic location where occurrence was observed, as described by observer or in source

SURVEY INFORMATION

First/Last Observation Date a particular occurrence was first/last observed; refers only to species occurrence as noted in source and does not imply the first/last date the species was present

Survey Date If conducted, date of survey

EO Type State rank qualifiers:

- **M** Migrant – species occurring regularly on migration at staging areas, or concentration along particular corridors; status refers to the transient population in the State
- **B** Qualifier indicating basic rank refers to the breeding population in State
- **N** Qualifier indicating basic rank refers to the non-breeding population in State

EO Rank

A	Excellent	**AI**	Excellent, Introduced
B	Good	**BI**	Good, Introduced
C	Marginal	**CI**	Marginal, Introduced
D	Poor	**DI**	Poor, Introduced
E	Extant/Present	**EI**	Extant, Introduced
H	Historical/No Field Information	**HI**	Historical, Introduced
X	Destroyed/Extirpated	**XI**	Destroyed, Introduced
O	Obscure	**OI**	Obscure, Introduced

EO Rank Date Latest date EO rank was determined or revised

Observed Area Acres, unless indicated otherwise

COMMENTS

Description General physical description of area and habitat where occurrence is located, including associated species, soils, geology, and surrounding land use

Comments Comments concerning the quality or condition of the element occurrence at time of survey

Protection Comments Observer comments concerning legal protection of the occurrence

Management Comments Observer comments concerning management recommendations appropriate for occurrence conservation

DATA

EO Data Biological data; may include number of individuals, vigor, flowering/fruiting data, nest success, behaviors observed, or unusual characteristic, etc.

SITE

Site Name Title given to site by surveyor

MANAGED AREA INFORMATION

Managed Area Name Place name or (on EOR printout) name of area when the EO is located within or partially within an area identified for conservation, such as State or Federal lands, nature preserves, parks, etc.

Alias Additional names the property is known by

Acres Total acreage of property, including non-contiguous tracts

Manager Contact name, address, and telephone number for area or nearest area land steward

Please use one of the following citations to credit the source for the printout information:

Texas Natural Diversity Database. [year of printouts]. Wildlife Diversity Program of Texas Parks & Wildlife Department. [day month year of printouts].

Texas Natural Diversity Database. [year of printouts]. Element occurrence printouts for [scientific name] *records # [occurrence number(s)]. Wildlife Diversity Program of Texas Parks & Wildlife Department. [day month year of printouts]. *Use of record #'s is optional.

Revised 1 Apr 2008

Last Revision: 8/7/2012 3:56:00 PM

EL PASO COUNTY

AMPHIBIANS

		Federal Status	State Status
Northern leopard frog	*Rana pipiens*		

streams, ponds, lakes, wet prairies, and other bodies of water; will range into grassy, herbaceous areas some distance from water; eggs laid March-May and tadpoles transform late June-August; may have disappeared from El Paso County due to habitat alteration

BIRDS

		Federal Status	State Status
American Peregrine Falcon	*Falco peregrinus anatum*	DL	T

year-round resident and local breeder in west Texas, nests in tall cliff eyries; also, migrant across state from more northern breeding areas in US and Canada, winters along coast and farther south; occupies wide range of habitats during migration, including urban, concentrations along coast and barrier islands; low-altitude migrant, stopovers at leading landscape edges such as lake shores, coastlines, and barrier islands.

Arctic Peregrine Falcon	*Falco peregrinus tundrius*	DL	

migrant throughout state from subspecies' far northern breeding range, winters along coast and farther south; occupies wide range of habitats during migration, including urban, concentrations along coast and barrier islands; low-altitude migrant, stopovers at leading landscape edges such as lake shores, coastlines, and barrier islands.

Baird's Sparrow	*Ammodramus bairdii*		

shortgrass prairie with scattered low bushes and matted vegetation; mostly migratory in western half of State, though winters in Mexico and just across Rio Grande into Texas from Brewster through Hudspeth counties

Ferruginous Hawk	*Buteo regalis*		

open country, primarily prairies, plains, and badlands; nests in tall trees along streams or on steep slopes, cliff ledges, river-cut banks, hillsides, power line towers; year-round resident in northwestern high plains, wintering elsewhere throughout western 2/3 of Texas

Interior Least Tern	*Sterna antillarum athalassos*	LE	E

subspecies is listed only when inland (more than 50 miles from a coastline); nests along sand and gravel bars within braided streams, rivers; also know to nest on man-made structures (inland beaches, wastewater treatment plants, gravel mines, etc); eats small fish and crustaceans, when breeding forages within a few hundred feet of colony

Mexican Spotted Owl	*Strix occidentalis lucida*	LT	T

remote, shaded canyons of coniferous mountain woodlands (pine and fir); nocturnal predator of mostly small rodents and insects; day roosts in densely vegetated trees, rocky areas, or caves

Montezuma Quail	*Cyrtonyx montezumae*		

open pine-oak or juniper-oak with ground cover of bunch grass on flats and slopes of semi-desert mountains and hills; travels in pairs or small groups; eats succulents, acorns, nuts, and weed seeds, as well as various invertebrates

EL PASO COUNTY

BIRDS

		Federal Status	State Status
Northern Aplomado Falcon	*Falco femoralis septentrionalis*	LE	E

open country, especially savanna and open woodland, and sometimes in very barren areas; grassy plains and valleys with scattered mesquite, yucca, and cactus; nests in old stick nests of other bird species

Peregrine Falcon	*Falco peregrinus*	DL	T

both subspecies migrate across the state from more northern breeding areas in US and Canada to winter along coast and farther south; subspecies (F. p. anatum) is also a resident breeder in west Texas; the two subspecies' listing statuses differ, F.p. tundrius is no longer listed in Texas; but because the subspecies are not easily distinguishable at a distance, reference is generally made only to the species level; see subspecies for habitat.

Prairie Falcon *Falco mexicanus*

open, mountainous areas, plains and prairie; nests on cliffs

Snowy Plover *Charadrius alexandrinus*

formerly an uncommon breeder in the Panhandle; potential migrant; winter along coast

Southwestern Willow Flycatcher	*Empidonax traillii extimus*	LE	E

thickets of willow, cottonwood, mesquite, and other species along desert streams

Sprague's Pipit	*Anthus spragueii*	C

only in Texas during migration and winter, mid September to early April; short to medium distance, diurnal migrant; strongly tied to native upland prairie, can be locally common in coastal grasslands, uncommon to rare further west; sensitive to patch size and avoids edges.

Western Burrowing Owl *Athene cunicularia hypugaea*

open grasslands, especially prairie, plains, and savanna, sometimes in open areas such as vacant lots near human habitation or airports; nests and roosts in abandoned burrows

Western Snowy Plover *Charadrius alexandrinus nivosus*

uncommon breeder in the Panhandle; potential migrant; winter along coast

Western Yellow-billed Cuckoo	*Coccyzus americanus occidentalis*	C;NL

status applies only to western population beyond the Pecos River Drainage; breeds in riparian habitat and associated drainages; springs, developed wells, and earthen ponds supporting mesic vegetation; deciduous woodlands with cottonwoods and willows; dense understory foliage is important for nest site selection; nests in willow, mesquite, cottonwood, and hackberry; forages in similar riparian woodlands; breeding season mid-May-late Sept

FISHES

		Federal Status	State Status
Bluntnose shiner	*Notropis simus simus*		T

extinct; Rio Grande; main river channel, often below obstructions over substrate of sand, gravel, and silt; damming and irrigation practices presumed major factors contributing to decline

EL PASO COUNTY

FISHES

		Federal Status	State Status
Rio Grande silvery minnow	*Hybognathus amarus*	LE	E

extirpated; historically Rio Grande and Pecos River systems and canals; reintroduced in Big Bend area; pools and backwaters of medium to large streams with low or moderate gradient in mud, sand, or gravel bottom; ingests mud and bottom ooze for algae and other organic matter; probably spawns on silt substrates of quiet coves

INSECTS

		Federal Status	State Status
A Royal moth	*Sphingicampa raspa*		

woodland - hardwood; with oaks, junipers, legumes and other woody trees and shrubs; good density of legume caterpillar foodplants must be present; Prairie acacia (Acacia augustissima) is the documented caterpillar foodplant, but there could be a few other woody legumes used

A tiger beetle *Cicindela hornii*

grassland/herbaceous; burrowing in or using soil; dry areas on hillside or mesas where soil is rocky or loamy and covered with grasses, invertivore; diurnal, hibernates/aestivates, active mostly for several days after heavy rains. the life cycle probably takes two years so larvae would always be present in burrows in the soil

Barbara Ann's tiger beetle *Cicindela politula barbarannae*

limestone outcrops in arid treeless environments or in openings within less arid pine-juniper-oak communities; open limestone substrate itself is almost certainly an essential feature; roads and trails

Poling's hairstreak *Fixsenia polingi*

oak woodland with Quercus grisea as substantial component, probably also uses Q. emoryi; larvae feed on new growth of Q. grisea, adults utilize nectar from a variety of flowers including milkweed and catslaw acacia; adults fly mid May - Jun, again mid Aug - early Sept

MAMMALS

		Federal Status	State Status
Big free-tailed bat	*Nyctinomops macrotis*		

habitat data sparse but records indicate that species prefers to roost in crevices and cracks in high canyon walls, but will use buildings, as well; reproduction data sparse, gives birth to single offspring late June-early July; females gather in nursery colonies; winter habits undetermined, but may hibernate in the Trans-Pecos; opportunistic insectivore

Black bear	*Ursus americanus*	T/SA;NL	T

bottomland hardwoods and large tracts of inaccessible forested areas; due to field characteristics similar to Louisiana Black Bear (LT, T), treat all east Texas black bears as federal and state listed Threatened

Black-footed ferret *Mustela nigripes* LE

extirpated; inhabited prairie dog towns in the general area

Black-tailed prairie dog *Cynomys ludovicianus*

dry, flat, short grasslands with low, relatively sparse vegetation, including areas overgrazed by cattle; live in large family groups

EL PASO COUNTY

MAMMALS

Federal Status State Status

Cave myotis bat *Myotis velifer*

colonial and cave-dwelling; also roosts in rock crevices, old buildings, carports, under bridges, and even in abandoned Cliff Swallow (Hirundo pyrrhonota) nests; roosts in clusters of up to thousands of individuals; hibernates in limestone caves of Edwards Plateau and gypsum cave of Panhandle during winter; opportunistic insectivore

Desert pocket gopher *Geomys arenarius*

cottonwood-willow association along the Rio Grande in El Paso and Hudspeth counties; live underground, but build large and conspicuous mounds; life history not well documented, but presumed to eat mostly vegetation, be active year round, and bear more than one litter per year

Fringed bat *Myotis thysanodes*

habitat variable, ranging from mountainous pine, oak, and pinyon-juniper to desert-scrub, but prefers grasslands at intermediate elevations; highly migratory species that arrives in Trans-Pecos by May to form nursery colonies; single offspring born June-July; roosts colonially in caves, mine tunnels, rock crevices, and old buildings

Gray wolf *Canis lupus* LE E

extirpated; formerly known throughout the western two-thirds of the state in forests, brushlands, or grasslands

Long-legged bat *Myotis volans*

in Texas, Trans-Pecos region; high, open woods and mountainous terrain; nursery colonies (which may contain several hundred individuals) form in summer in buildings, crevices, and hollow trees; apparently do not use caves as day roosts, but may use such sites at night; single offspring born June-July

Pale Townsend's big-eared bat *Corynorhinus townsendii pallescens*

roosts in caves, abandoned mine tunnels, and occasionally old buildings; hibernates in groups during winter; in summer months, males and females separate into solitary roosts and maternity colonies, respectively; single offspring born May-June; opportunistic insectivore

Pecos River muskrat *Ondatra zibethicus ripensis*

creeks, rivers, lakes, drainage ditches, and canals; prefer shallow, fresh water with clumps of marshy vegetation, such as cattails, bulrushes, and sedges; live in dome-shaped lodges constructed of vegetation; diet is mainly vegetation; breed year round

Western red bat *Lasiurus blossevillii*

roosts in tree foliage in riparian areas, also inhabits xeric thorn scrub and pine-oak forests; likely winter migrant to Mexico; multiple pups born mid-May - late Jun

Western small-footed bat *Myotis ciliolabrum*

mountainous regions of the Trans-Pecos, usually in wooded areas, also found in grassland and desert scrub habitats; roosts beneath slabs of rock, behind loose tree bark, and in buildings; maternity colonies often small and located in abandoned houses, barns, and other similar structures; apparently occurs in Texas only during spring and summer months; insectivorous

EL PASO COUNTY

MAMMALS

		Federal Status	State Status

Yuma myotis bat *Myotis yumanensis*

desert regions; most commonly found in lowland habitats near open water, where forages; roosts in caves, abandoned mine tunnels, and buildings; season of partus is May to early July; usually only one young born to each female

MOLLUSKS

		Federal Status	State Status

Franklin Mountain talus snail *Sonorella metcalfi*

terrestrial; bare rock, talus, scree; inhabits igneous talus most commonly of rhyolitic origin

Franklin Mountain wood snail *Ashmunella pasonis*

terrestrial; bare rock, talus, scree; talus slopes, usually of limestone, but also of rhyolite, sandstone, and siltstone, in arid mountain ranges

REPTILES

		Federal Status	State Status

Big Bend slider *Trachemys gaigeae*

almost exclusively aquatic, sliders (Trachemys spp.) prefer quiet bodies of fresh water with muddy bottoms and abundant aquatic vegetation, which is their main food source; will bask on logs, rocks or banks of water bodies; breeding March-July

Chihuahuan Desert lyre snake *Trimorphodon vilkinsonii* T

mostly crevice-dwelling in predominantly limestone-surfaced desert northwest of the Rio Grande from Big Bend to the Franklin Mountains, especially in areas with jumbled boulders and rock faults/fissures; secretive; egg-bearing; eats mostly lizards

Mountain short-horned lizard *Phrynosoma hernandesi* T

diurnal, usually in open, shrubby, or openly wooded areas with sparse vegetation at ground level; soil may vary from rocky to sandy; burrows into soil or occupies rodent burrow when inactive; eats ants, spiders, snails, sowbugs, and other invertebrates; inactive during cold weather; breeds March-September

New Mexico garter snake *Thamnophis sirtalis dorsalis*

nearly any type of wet or moist habitat; irrigation ditches, and riparian-corridor farmlands, less often in running water; home range about 2 acres; active year round in warm weather, both diurnal and nocturnal, more nocturnal during hot weather; bears litter July-August

Texas horned lizard *Phrynosoma cornutum* T

open, arid and semi-arid regions with sparse vegetation, including grass, cactus, scattered brush or scrubby trees; soil may vary in texture from sandy to rocky; burrows into soil, enters rodent burrows, or hides under rock when inactive; breeds March-September

EL PASO COUNTY

PLANTS

Federal Status State Status

Comal snakewood *Colubrina stricta*

in El Paso County, found in a patch of thorny shrubs in colluvial deposits and sandy soils at the base of an igneous rock outcrop; the historic Comal County record does not describe the habitat; in Mexico ,found in shrublands on calcareous, gravelly, clay soils with woody associates; flowering late spring or early summer

Desert night-blooming cereus *Peniocereus greggii var greggii*

Chihuahuan Desert shrublands or shrub invaded grasslands in alluvial or gravelly soils at lower elevations, 1200-1500 m (3900-4900 ft), on slopes, benches, arroyos, flats, and washes; flowering synchronized over a few nights in early May to late June when almost all mature plants bloom, flowers last only one day and open just after dark, may flower as early as April

Hueco rock-daisy *Perityle huecoensis*

north-facing or otherwise mostly shaded limestone cliff faces within relatively mesic canyon system; flowering spring-fall

Sand prickly-pear *Opuntia arenaria*

deep, loose or semi-stabilized sands in sparsely vegetated dune or sandhill areas, or sandy floodplains in arroyos; flowering May-June

Sand sacahuista *Nolina arenicola*

Texas endemic; mesquite-sand sage shrublands on windblown Quarternary reddish sand in dune areas; flowering time uncertain May-June, June-September

Sneed's pincushion cactus *Escobaria sneedii var sneedii* LE E

xeric limestone outcrops on rocky, usually steep slopes in desert mountains, in the Chihuahuan Desert succulent shrublands or grasslands; flowering April-September (peak usually in April, sometimes opportunistically after summer rains; fruiting August - November

Texas false saltgrass *Allolepis texana*

sandy to silty soils of valley bottoms and river floodplains, not generally on alkaline or saline sites; flowering (May-) July-October depending on rainfall

Vasey's bitterweed *Hymenoxys vaseyi*

Occurs on xeric limestone cliffs and slopes at mid- to high elevations in desert shrublands.

Wheeler's spurge *Chamaesyce geyeri var wheeleriana*

sparingly vegetated, loose eolian quartz sand on reddish sand dunes or coppice mounds; flowering and fruiting at least August-September, probably earlier and later, as well

Responses to letter received from Texas Parks and Wildlife Department dated 24 October 2012:

Fort Bliss appreciates the comments received from TPWD regarding the Environmental Assessment for Immigration and Customs Enforcement El Paso City Administrative Facility, Fort Bliss, Texas. These comments have been thoroughly examined and evaluated by Fort Bliss DPW-E personnel and changes made to the document as indicated:

Fort Bliss concurs with the recommendation to avoid impacts to native vegetation to the greatest extent possible, and wording that effect will be added to the mitigations listed in Chapter 5.0. Likewise, mitigation to minimize impacts to the Texas horned lizard, mountain short-horned lizard, and burrowing owl would include the recommendation for pre-construction biological surveys to confirm their presence or absence. Migratory birds would be protected in accordance with the Migratory Bird Treaty Act to include phasing construction around nesting season, and implementing best management practices to avoid harassing or harming these species.

The proposed ICE facility site does not contain habitat for Wheeler's spurge. Furthermore, surveys completed to date elsewhere on the Texas portion of Fort Bliss in deep sand substrates have not found this plant species.

The black-tailed prairie dog is not known to be present in the proposed construction area as there is no habitat for this animal in the Texas portion of Fort Bliss. The only known population of prairie dogs exists on the Otero Mesa portion of Fort Bliss in New Mexico.

APPENDIX B
AIR EMISSIONS CALCULATIONS

National Ambient Air Quality Standards

Pollutant	Primary Standards		Secondary Standards	
	Level	Averaging Time	Level	Averaging Times
Carbon Monoxide	9 ppm (10 mg/m^3)	8-hour [1]	None	
	35 ppm (40 mg/m^3)	1-hour [1]		
Lead	0.15 µg/m^3 [2]	Rolling 3-Month Average	Same as Primary	
	1.5 µg/m^3	Quarterly Average	Same as Primary	
Nitrogen Dioxide	53 ppb [3]	Annual (Arithmetic Average)	Same as Primary	
	100 ppb	1-hour [4]	None	
Particulate Matter (PM-10)	150 µg/m^3	24-hour [5]	Same as Primary	
Particulate Matter (PM-2.5)	15.0 µg/m^3	Annual [6] (Arithmetic Average)	Same as Primary	
	35 µg/m^3	24-hour [7]	Same as Primary	
Ozone	0.075 ppm (2008 std)	8-hour [8]	Same as Primary	
	0.08 ppm (1997 std)	8-hour [9]	Same as Primary	
	0.12 ppm	1-hour [10]	Same as Primary	
Sulfur Dioxide	0.03 ppm	Annual (Arithmetic Average)	0.5 ppm	3-hour [1]
	0.14 ppm	24-hour [1]		
	75 ppb [11]	1-hour	None	

Source: USEPA 2011 at http://www.epa.gov/air/criteria.html

Units of measure for the standards are parts per million (ppm) by volume, parts per billion (ppb - 1 part in 1,000,000,000) by volume, milligrams per cubic meter of air (mg/m^3), and micrograms per cubic meter of air (µg/m^3).

[1] Not to be exceeded more than once per year.

[2] Final rule signed October 15, 2008.

[3] The official level of the annual NO_2 standard is 0.053 ppm, equal to 53 ppb, which is shown here for the purpose of clearer comparison to the 1-hour standard

[4] To attain this standard, the 3-year average of the 98th percentile of the daily maximum 1-hour average at each monitor within an area must not exceed 100 ppb (effective January 22, 2010).

[5] Not to be exceeded more than once per year on average over 3 years.

[6] To attain this standard, the 3-year average of the weighted annual mean PM2.5 concentrations from single or multiple community-oriented monitors must not exceed 15.0 µg/m3.

[7] To attain this standard, the 3-year average of the 98th percentile of 24-hour concentrations at each population-oriented monitor within an area must not exceed 35 µg/m3 (effective December 17, 2006).

[8] To attain this standard, the 3-year average of the fourth-highest daily maximum 8-hour average ozone concentrations measured at each monitor within an area over each year must not exceed 0.075 ppm. (effective May 27, 2008)

[9] (a) To attain this standard, the 3-year average of the fourth-highest daily maximum 8-hour average ozone concentrations measured at each monitor within an area over each year must not exceed 0.08 ppm.

(b) The 1997 standard—and the implementation rules for that standard—will remain in place for implementation purposes as USEPA undertakes rulemaking to address the transition from the 1997 ozone standard to the 2008 ozone standard.

(c)USEPA is in the process of reconsidering these standards (set in March 2008).

[10] (a)USEPA revoked the 1-hour ozone standard in all areas, although some areas have continuing obligations under that standard ("anti-backsliding").

(b) The standard is attained when the expected number of days per calendar year with maximum hourly average concentrations above 0.12 ppm is ≤ 1.

[11] (a) Final rule signed June 2, 2010. To attain this standard, the 3-year average of the 99th percentile of the daily maximum 1-hour average at each monitor within an area must not exceed 75 ppb.

CALCULATION SHEET-COMBUSTION EMISSIONS-CONSTRUCTION

Assumptions for Combustion Emissions					
Type of Construction Equipment	Num. of Units	HP Rated	Hrs/day	Days/yr	Total hp-hrs
Water Truck	1	300	8	240	576000
Diesel Road Compactors	1	100	8	30	24000
Diesel Dump Truck	1	300	8	120	288000
Diesel Excavator	1	300	8	60	144000
Diesel Hole Trenchers	1	175	8	60	84000
Diesel Bore/Drill Rigs	1	300	8	60	144000
Diesel Cement & Mortar Mixers	3	300	8	240	1728000
Diesel Cranes	1	175	8	240	336000
Diesel Graders	3	300	8	60	432000
Diesel Tractors/Loaders/Backhoes	2	100	8	240	384000
Diesel Bulldozers	2	300	8	120	576000
Diesel Front-End Loaders	2	300	8	120	576000
Diesel Forklifts	2	100	8	240	384000
Diesel Generator Set	2	40	8	240	153600

Emission Factors[1]							
Type of Construction Equipment	VOC g/hp-hr	CO g/hp-hr	NOx g/hp-hr	PM-10 g/hp-hr	PM-2.5 g/hp-hr	SO2 g/hp-hr	CO2 g/hp-hr
Water Truck	0.440	2.070	5.490	0.410	0.400	0.740	536.000
Diesel Road Compactors	0.370	1.480	4.900	0.340	0.330	0.740	536.200
Diesel Dump Truck	0.440	2.070	5.490	0.410	0.400	0.740	536.000
Diesel Excavator	0.340	1.300	4.600	0.320	0.310	0.740	536.300
Diesel Trenchers	0.510	2.440	5.810	0.460	0.440	0.740	535.800
Diesel Bore/Drill Rigs	0.600	2.290	7.150	0.500	0.490	0.730	529.700
Diesel Cement & Mortar Mixers	0.610	2.320	7.280	0.480	0.470	0.730	529.700
Diesel Cranes	0.440	1.300	5.720	0.340	0.330	0.730	530.200
Diesel Graders	0.350	1.360	4.730	0.330	0.320	0.740	536.300
Diesel Tractors/Loaders/Backhoes	1.850	8.210	7.220	1.370	1.330	0.950	691.100
Diesel Bulldozers	0.360	1.380	4.760	0.330	0.320	0.740	536.300
Diesel Front-End Loaders	0.380	1.550	5.000	0.350	0.340	0.740	536.200
Diesel Forklifts	1.980	7.760	8.560	1.390	1.350	0.950	690.800
Diesel Generator Set	1.210	3.760	5.970	0.730	0.710	0.810	587.300

CALCULATION SHEET-COMBUSTION EMISSIONS-CONSTRUCTION

1. Emission factors (EF) were generated using USEPA's preferred model for nonroad sources, the NONROAD2008 model. Emmisions were modeled for the 2007 calendar year. The VOC EFs includes exhaust and evaporative emissions. The VOC evaporative components included in the NONROAD2008 model are diurnal, hotsoak, running loss, tank permeation, hose permeation, displacement, and spillage. The construction equipment age distribution in the NONROAD2008 model is based on the population in U.S. for the 2007 calendar year.

Emission Calculations							
Type of Construction Equipment	VOC tons/yr	CO tons/yr	NOx tons/yr	PM-10 tons/yr	PM-2.5 tons/yr	SO2 tons/yr	CO2 tons/yr
Water Truck	0.279	1.314	3.485	0.260	0.254	0.470	340.227
Diesel Road Paver	0.010	0.039	0.130	0.009	0.009	0.020	14.181
Diesel Dump Truck	0.140	0.657	1.742	0.130	0.127	0.235	170.114
Diesel Excavator	0.054	0.206	0.730	0.051	0.049	0.117	85.104
Diesel Hole Cleaners\Trenchers	0.047	0.226	0.538	0.043	0.041	0.069	49.598
Diesel Bore/Drill Rigs	0.095	0.363	1.135	0.079	0.078	0.116	84.057
Diesel Cement & Mortar Mixers	1.162	4.418	13.863	0.914	0.895	1.390	1008.684
Diesel Cranes	0.163	0.481	2.118	0.126	0.122	0.270	196.318
Diesel Graders	0.167	0.647	2.252	0.157	0.152	0.352	255.313
Diesel Tractors/Loaders/Backhoes	0.783	3.474	3.055	0.580	0.563	0.402	292.451
Diesel Bulldozers	0.229	0.876	3.021	0.209	0.203	0.470	340.417
Diesel Front-End Loaders	0.241	0.984	3.174	0.222	0.216	0.470	340.354
Diesel Aerial Lifts	0.838	3.284	3.622	0.588	0.571	0.402	292.324
Diesel Generator Set	0.205	0.636	1.011	0.124	0.120	0.137	99.411
Total Emissions	**4.411**	**17.607**	**39.875**	**3.492**	**3.400**	**4.919**	**3568.555**

Conversion factors	
Grams to tons	1.102E-06

MOVES2010a MODEL ON-ROAD TRANSPORTATION AIR EMISSIONS-
DELIVERY MATERIALS AND COMMUTING DURING CONSTRUCTION ACTIVITIES

MOVES 2010a Delivery Trucks and Construction Workers Commuting					
Source	**Fuel type**	**Number of vehicles**	**Miles traveled per day**	**Days of travel per year**	**Miles traveled per year**
Passenger cars	Gasoline	60	20	240	288,000
Passenger truck	Gasoline	60	20	240	288,000
Light commercial truck	Diesel	6	20	240	28,800
Short-haul truck	Diesel	6	120	240	172,800
Long-haul truck	Diesel	6	80	240	115,200

Emission Factors (MOVES 2010a Emission Rates)[1]							
Source	**VOC (g/mile)**	**CO (g/mile)**	**NOx (g/mile)**	**PM-10 (g/mile)**	**PM-2.5 (g/mile)**	**SO_2 (g/mile)**	**CO2 and CO2 Equivalents (g/mile)**
Passenger cars	8.497	2.892	0.576	0.019	0.018	0.005	320
Passenger truck	23.456	5.449	1.168	0.027	0.025	0.007	439
Light commercial truck	4.460	2.158	2.986	0.164	0.190	0.005	609
Short-haul truck	2.438	2.273	6.095	0.270	0.313	0.007	929
Long-haul truck	2.519	3.610	14.776	0.625	0.726	0.016	2,020

Total Emission for On-Road Construction Activities (tons/year)							
Source	**VOC**	**CO**	**NOx**	**PM-10**	**PM-2.5**	**SO_2**	**CO2 and CO2 Equivalents**
Passenger cars	2.697	0.918	0.183	0.006	0.006	0.002	102
Passenger truck	7.444	1.729	0.371	0.009	0.008	0.002	139
Light commercial truck	0.142	0.068	0.095	0.005	0.006	0.000	19
Short-haul truck	0.464	0.433	1.161	0.051	0.060	0.001	177
Long-haul truck	0.320	0.458	1.876	0.079	0.092	0.002	257
Total	**11.066**	**3.607**	**3.685**	**0.151**	**0.171**	**0.007**	**694**

Key:

Short-haul trucks category include trucks such as dump trucks and cement trucks.
Long-haul trucks category includes trucks such as semi-trailer (18 wheeler).

[1]Emission factors were generated by USEPA prefered model MOVES2010a. MOVES simulates daily motor vehicle operations and produces emission rates. MOVES emission rates include sources from engine combustion, tire wear, brake wear, evaporative fuel permiation, vapor venting and leaking (running and parking), and crankcase loss. Emission rates are daily averages for each of the criteria pollutants. The averages from a combination of vehicle operations such as: stop and go, highway travel, acceleration at on-ramps, parking, start-up, extended idle, etc.

CALCULATION SHEET-FUGITIVE DUST-CONSTRUCTION

Construction Fugitive Dust Emission Factors

	Emission Factor	Units	Source
General Construction Activities	0.19	ton PM10/acre-month	MRI 1996; EPA 2001; EPA 2006
New Road Construction	0.42	ton PM10/acre-month	MRI 1996; EPA 2001; EPA 2006

PM2.5 Emissions

PM2.5 Multiplier	0.10	(10% of PM10 emissions assumed to be PM2.5)	EPA 2001; EPA 2006
Control Efficiency	0.50	(assume 50% control efficiency for PM10 and PM2.5 emissions)	EPA 2001; EPA 2006

Project Assumptions

Construction Area (0.19 ton PM10/acre-month)			**Conversion Factors**	
Duration of Soil Disturbance in Project	12	months	0.000022957	acres per feet
Length	0	miles	5280	feet per mile
Length (converted)	0	feet		
Width	0	feet		
Area	20.00	acres		

Staging Areas		
Duration of Construction Project	12	months
Length		miles
Length (converted)		feet
Width		feet
Area	2.00	acres

	Project Emissions (tons/year)			
	PM10 uncontrolled	**PM10 controlled**	**PM2.5 uncontrolled**	**PM2.5 controlled**
Construction Area (0.19 ton PM10/acre-month)	45.60	22.80	4.56	2.28
Staging Areas	0.38	0.19	0.04	0.02
Total	**45.98**	**22.99**	**4.60**	**2.30**

References:

USEPA 2001. *Procedures Document for National Emissions Inventory, Criteria Air Pollutants, 1985-1999.* EPA-454/R-01-006. Office of Air Quality Planning and Standards, United States Environmental Protection Agency. March 2001.

USEPA 2006. *Documentation for the Final 2002 Nonpoint Sector (Feb 06 version) National Emission Inventory for Criteria and Hazardous Air Pollutants.*Prepared for: Emissions Inventory and Analysis Group (C339-02) Air Quality Assessment Division Office of Air Quality Planning and Standards, United States Environmental Protection Agency. July 2006.

MRI 1996. *Improvement of Specific Emission Factors (BACM Project No. 1).* Midwest Research Institute (MRI). Prepared for the California South Coast Air Quality Management District, March 29, 1996.

Assumptions for Fugitive Emissions

General Construction Activities Emission Factor

0.19 ton PM10/acre-month Source: MRI 1996; EPA 2001; EPA 2006

The area-based emission factor for construction activities is based on a study completed by the Midwest Research Institute (MRI) Improvement of Specific Emission Factors (BACM Project No. 1), March 29, 1996. The MRI study evaluated seven construction projects in Nevada and California (Las Vegas, Coachella Valley, South Coast Air Basin, and the San Joaquin Valley). The study determined an average emission factor of 0.11 ton PM10/acre-month for sites without large-scale cut/fill operations. A worst-case emission factor of 0.42 ton PM10/acre-month was calculated for sites with active large-scale earth moving operations. The monthly emission factors are based on 168 work-hours per month (MRI 1996). A subsequent MRI Report in 1999, Estimating Particulate Matter Emissions from Construction Operations, calculated the 0.19 ton PM10/acre-month emission factor by applying 25% of the large-scale earthmoving emission factor (0.42 ton PM10/acre-month) and 75% of the average emission factor (0.11 ton PM10/acre-month).

The 0.19 ton PM10/acre-month emission factor is referenced by the EPA for non-residential construction activities in recent procedures documents for the National Emission Inventory (EPA 2001; EPA 2006). The 0.19 ton PM10/acre-month emission factor represents a refinement of EPA's original AP-42 area-based total suspended particle (TSP) emission factor in Section 13.2.3 Heavy Construction Operations. In addition to the EPA, this methodology is also supported by the South Coast Air Quality Management District and the Western Regional Air Partnership (WRAP) which is funded by the EPA and is administered jointly by the Western Governor's Association and the National Tribal Environmental Council. The emission factor is assumed to encompass a variety of non-residential construction activities including building construction (commercial, industrial, institutional, governmental), public works, and travel on unpaved roads. The EPA National Emission Inventory documentation assumes that the emission factors are uncontrolled and recommends a control efficiency of 50% for PM10 and PM2.5 in PM nonattainment areas.

New Road Construction Emission Factor

0.42 ton PM10/acre-month Source: MRI 1996; EPA 2001; EPA 2006

The emission factor for new road construction is based on the worst-case conditions emission factor from the MRI 1996 study described above (0.42 tons PM10/acre-month). It is assumed that road construction involves extensive earthmoving and heavy construction vehicle travel resulting in emissions that are higher than other general construction projects. The 0.42 ton PM10/acre-month emission factor for road construction is referenced in recent procedures documents for the EPA National Emission Inventory (EPA 2001; EPA 2006).

PM2.5 Multiplier **0.10**

PM2.5 emissions are estimated by applying a particle size multiplier of 0.10 to PM10 emissions. This methodology is consistent with the procedures documents for the National Emission Inventory (EPA 2006).

Control Efficiency for PM10 and PM2.5 **0.50**

The EPA National Emission Inventory documentation recommends a control efficiency of 50% for PM10 and PM2.5 in PM nonattainment areas. Wetting controls will be applied during project construction (EPA 2006).

References:

EPA 2001. *Procedures Document for National Emissions Inventory, Criteria Air Pollutants, 1985-1999.* EPA-454/R-01-006. Office of Air Quality Planning and Standards, United States Environmental Protection Agency. March 2001.

EPA 2006. *Documentation for the Final 2002 Nonpoint Sector (Feb 06 version) National Emission Inventory for Criteria and Hazardous Air Pollutants.* Prepared for: Emissions Inventory and Analysis Group (C339-02) Air Quality Assessment Division Office of Air Quality Planning and Standards, United States Environmental Protection Agency. July 2006.

MRI 1996. *Improvement of Specific Emission Factors (BACM Project No. 1).* Midwest Research Institute (MRI). Prepared for the California South Coast Air Quality Management District, March 29, 1996.

CALCULATION SHEET-SUMMARY OF EMISSIONS

Assumptions for Combustion Emissions									
Emission Source	VOC	CO	NOx	PM-10	PM-2.5	SO2	CO2	CO2 Equivalents	Total CO2
Combustion Emissions	4.41	17.61	39.88	3.49	3.40	4.92	3568.56	12,511	16,080
Construction Site-Fugitive PM-10	NA	NA	NA	22.99	2.30	NA	NA	NA	NA
Construction Workers Commuter & Trucking	11.07	3.61	3.68	0.15	0.17	0.01	NA	694	694
Total Emissions-CONSTRUCTION	**15.48**	**21.21**	**43.56**	**26.63**	**5.87**	**4.93**	**3569**	**13,205**	**16,774**
De minimis Threshold (1)	100	100	100	70	100	100	NA	NA	25,000

1. Note that El Paso County is a moderate non-attainment area for PM-10 and a maintenance area for CO (USEPA 2010b).

Carbon Equivalents	Conversion Factor
N2O or NOx	311
Methane or VOCs	25

Source: EPA 2010 Reference, Tables and Conversions, Inventory of U.S. Greenhouse Gas Emissions and Sinks; http://www.epa.gov/climatechange/emissions/usinventoryreport.html

APPENDIX C
TRAFFIC IMPACT ANALYSIS,
ICE EL PASO CO-LOCATION FACILITY (HUITT-ZOLLARS)

TRAFFIC IMPACT ANALYSIS
ICE EL PASO CO-LOCATION FACILITY

EL PASO, TEXAS

October 25, 2011

US Army Corps of Engineers

HUITT-ZOLLARS

Traffic Impact Analysis

ICE El Paso Co-Location Facility

Prepared By:

HUITT-ZOLLARS

F-761

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October 25, 2011

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Introduction

The U.S. Immigration and Customs Enforcement (ICE) has proposed a site for their future facility on the north side of Montana Ave. between Lee Blvd. and Saul Kleinfeld Blvd. adjacent to the Texas Army National Guard facility. Refer to Exhibit 1 for the project location. This traffic study was prepared in order to determine the impacts of the generated traffic of the proposed facility to Montana Ave. and nearby intersections and to hold discussions with TxDOT regarding access to Montana Ave.

Traffic impact studies are commonly based on intersection Level of Service (LOS). LOS is a measure of driving conditions and vehicle delay and is calculated using principles in the *Highway Capacity Manual* published by the Transportation Research Board. LOS allows discussion and comparison of traffic operations on roadway facilities. It ranges from A (best) to F (poorest). A, B, and C indicate conditions where traffic can move freely. D describes conditions where delay is noticeable. E and F indicate conditions where traffic volumes are close to capacity or beyond capacity, experiencing significant delays, slow speeds, stop-and-go conditions, and queuing at signalized intersections.

Table 1 lists the LOS definitions for signalized and unsignalized intersections as defined in the *Highway Capacity Manual*.

Table 1 - Level of Service Standards

LOS	Signalized Intersection Delay (sec)	Unsignalized Intersection Delay (sec)	Traffic Flow Characteristics
A	<10	0-10	Virtually free flow, completely unimpeded
B	>10-20	>10-15	Stable Flow with slight delays, less freedom to maneuver
C	>20-35	>15-25	Stable flow with delays, less freedom to maneuver
D	>35-55	>25-35	High density, but stable flow
E	>55-80	>35-50	Operating conditions at or near capacity, unstable flow
F	>80	>50	Forced flow, breakdown conditions

< = less than > = greater than

The City of El Paso's ordinance defines the traffic study requirements including radius and analysis periods. For a site that generates more than 100 trips in the peak hour, the City requests a 1-mile radius for the analysis of the proposed site.

The major intersections along Montana Ave. within a 1-mile radius were selected for the study area. These intersections are signalized unless otherwise noted:

- Montana Ave. and George Dieter Dr.
- Montana Ave. and Saul Kleinfeld Dr.

- Montana Ave. and Lee Blvd.
- Montana Ave. and Leticia St. – unsignalized

These intersections were analyzed to determine the LOS for the AM and PM peak-hours. Synchro 7 software, produced by Trafficware, was used to automate the calculation of LOS, intersection delay, and queue length. The City's ordinance requires analysis of the following periods:

- Existing conditions – 2011
- Background growth – 2013
- Opening year (Phase I) – 2013
- Background growth – 2018
- Build-out year (Phase II) - 2018
- Background growth - 2023
- 5 years after build-out – 2023

The Phase II opening date of 2018 is an assumed date; timeframe or funds have not been identified for any construction beyond Phase I. The City of El Paso's traffic ordinance requests analyses at 5 years and 10 year after build-out. Since the build out years are unknown, only the 2023 analysis was included for the 5 years after build out.

Existing Conditions & Volumes

The proposed site location consists of undeveloped land adjacent to Montana Avenue with the Texas Army National Guard facility to the east. The undeveloped land, including areas north and west of the proposed site, belongs to Fort Bliss.

Traffic to and from the proposed facility is anticipated to use major nearby roadways which include Montana Ave., Loop 375, Spur 601 and Global Reach Dr. Montana Ave. is a four lane divided major arterial with two lanes in both the eastbound and westbound directions. Loop 375 (Purple Heart Memorial Freeway) lies east of the project site and is a state freeway with access from Montana Ave. Spur 601 (Liberty Expressway) lies northwest of the project site and is also a state freeway with a connection to Global Reach. Global Reach Dr. is a divided minor arterial with two lanes in the northbound and southbound directions. Global Reach Dr. connects to Montana Ave. Refer to Exhibit 6 for the surrounding roadways.

Historic turning movement counts for the following intersections were provided by the City of El Paso Department of Transportation. The years of the available count data are indicated next to each intersection.

- Montana Ave. and George Dieter Dr. 2006, 2009, 2011
- Montana Ave. and Saul Kleinfeld Dr. 2007, 2009, 2011
- Montana Ave. and Lee Blvd. 2006, 2011

A review of these counts indicated that after 2009 the traffic volume along Montana Ave. decreased. This decrease occurred at the same time that Spur 601, which serves as a parallel route to Montana Ave., was opened to traffic. Before the opening of Spur 601, Montana Ave. experienced a growth rate of 15% per year (measured from 2006 to 2009 counts at the intersection of Montana Ave. and George Dieter Dr.) Traffic growth on Montana Ave. after the opening of Spur 601 is unknown since additional data is not yet available.

On September 22, 2011, peak hour traffic counts at the study area intersections were performed by GRAM Traffic (as a subcontractor to Huitt-Zollars). The traffic counts provided existing peak hour volumes for each direction of traffic. The AM peak hour was identified between 7 to 8 AM and the PM peak hour between 4:30 to 5:30 PM. The turning movement counts are illustrated on Exhibit 2 and included in Appendix A.

The existing turning movement data was entered into Synchro 7 software to create a traffic model to study LOS (level of service), delays, and queuing. Existing LOS results for the AM and PM peak hours are provided in the following table.

Table 2 – Existing Conditions LOS 2011

Int. No.	Intersection	Peak Hour	Int. Delay (sec)	Overall LOS
1	Montana Ave. and George Dieter Dr.	AM	73	E
		PM	26	C
2	Montana Ave. and Lee Blvd.	AM	18	B
		PM	17	B
3	Montana Ave. and Saul Kleinfeld Dr.	AM	34	C
		PM	21	C
4	Montana Ave. and Leticia St.	AM	23	C*
		PM	67	F*

**Note: Represents side street approach LOS at intersection*

The City of El Paso strives to maintain a LOS C at major intersections. Intersections that operate below a LOS C are defined as “deficient”. One of the signalized intersections fits this definition by experiencing a LOS D or worse in the existing conditions AM peak hour:

- Intersection 1 - Montana Ave. and George Dieter Dr.

The conditions are due to the high westbound through volumes on Montana Ave. competing for the available green time with the northbound volumes at these arterial streets. The conditions are an existing concern, not associated with the proposed project. The City may choose to participate in any mitigation or

improvements to restore these intersections to a minimum LOS C. The possibility of City participation has not been discussed as part of this study.

Background Traffic Growth

The existing volumes for 2011 were increased to represent background growth for the 2013, 2018, and 2023 time periods. Traffic volume growth along Montana Ave. is anticipated to be slower than in the past due to Spur 601 which serves as a parallel route. On the south side, much of the area along Montana Ave. is fully developed. On the north side, development is likely to occur during the next 10 to 20 years as Fort Bliss releases land to private developers. Based on this information, a low-to-moderate growth rate of 1.5% per year was selected to estimate future traffic volumes. The estimated volumes for 2013 are illustrated on Exhibit 3. The models were updated with the background traffic volumes.

At the time of this study, construction of the Texas Army National Guard was nearly complete adjacent to the proposed ICE project. The main driveway for the Texas Army National Guard aligns with Intersection 3, Montana Ave. and Saul Kleinfeld Dr. The driveway was under construction at the time of the counts. Plans were reviewed in order to understand the proposed signal modifications for the driveway. Nominal volumes were assumed and applied to this intersection to represent the peak hour traffic at this proposed driveway. The volumes are low since the weekday workforce at the Texas Army National Guard is small. Refer to Exhibits 3, 4, and 5 for background turning movement counts for 2013, 2018, and 2023.

The following table provides the LOS and delay for the background growth.

Table 3 –Background Growth - 2013

Int. No.	Intersection	Peak Hour	Int. Delay (sec)	Overall LOS
1	Montana Ave. and George Dieter Dr.	AM	81	F
		PM	28	C
2	Montana Ave. and Lee Blvd.	AM	19	B
		PM	18	B
3	Montana Ave. and Saul Kleinfeld Dr.	AM	40	D
		PM	24	C
4	Montana Ave. and Leticia St.	AM	25	C*
		PM	80	F*

**Note: Represents side street approach LOS at intersection*

The 2013 results have slightly higher delays than the 2011 results. Two of the signalized intersections are deficient and experience a LOS D or worse in the 2013 background conditions:

- Intersection 1 - Montana Ave. and George Dieter Dr.
- Intersection 3 - Montana Ave. and Saul Kleinfeld Dr.

Again, the City may choose to participate in any recommended mitigation or improvements to restore these intersections to a minimum LOS C. The possibility of City participation has not been discussed.

There has been an ongoing effort to improve capacity on Montana Ave. Several alternatives have been considered during the past decades. In early 2011, TxDOT TxDOT began a widening project to increase Montana to 6 lanes. The project consisted of resurfacing and restriping. Several weeks into the project, it was stopped by the FHWA since the widening was not included in the MPO's conformity analysis for this non-attainment zone. TxDOT and the MPO are working to gain approval and reopen the additional lanes to improve traffic circulation on this highway. It is likely that this project will be approved and implemented in the next several years. Therefore the background conditions were reanalyzed with Montana Ave. widened to 6 lanes. The results are listed in the following table.

Table 4 –Background Growth – 2013 with Montana Ave. Widening

Int. No.	Intersection	Peak Hour	Int. Delay (sec)	Overall LOS
1	Montana Ave. and George Dieter Dr.	AM	47	D
		PM	28	C
2	Montana Ave. and Lee Blvd.	AM	15	B
		PM	13	B
3	Montana Ave. and Saul Kleinfeld Dr.	AM	34	C
		PM	21	C
4	Montana Ave. and Leticia St.	AM	20	C*
		PM	53	F*

**Note: Represents side street approach LOS at intersection*

The LOS and delay improve significantly. One of the signalized intersections is deficient and experiences a LOS D or worse in 2013 with the widening of Montana Ave:

- Intersection 1 – Montana Ave and George Dieter Dr.

The background growth calculations were performed again for 2018 and 2023. The widening of Montana Ave. was expected to have occurred. The results are listed in the following tables.

Table 5 –Background Growth – 2018 with Montana Ave. Widening

Int. No.	Intersection	Peak Hour	Int. Delay (sec)	Overall LOS
1	Montana Ave. and George Dieter Dr.	AM	53	D
		PM	35	C
2	Montana Ave. and Lee Blvd.	AM	16	B
		PM	15	B
3	Montana Ave. and Saul Kleinfeld Dr.	AM	36	D
		PM	25	C
4	Montana Ave. and Leticia St.	AM	23	C*
		PM	85	F*

**Note: Represents side street approach LOS at intersection*

The delay increased slightly at each intersection as a result of the background growth. One of the signalized intersections is deficient and experiences decrease in LOS from a C to a D in 2018 during the AM peak hour with the widening of Montana Ave:

- Intersection 3 – Montana Ave. and Saul Kleinfeld Dr.

The background growth results were compared with the proposed conditions results to determine whether the project impacts the traffic circulation at the intersections.

Table 6 –Background Growth – 2023 with Montana Ave. Widening

Int. No.	Intersection	Peak Hour	Int. Delay (sec)	Overall LOS
1	Montana Ave. and George Dieter Dr.	AM	60	E
		PM	45	D
2	Montana Ave. and Lee Blvd.	AM	17	B
		PM	17	B
3	Montana Ave. and Saul Kleinfeld Dr.	AM	38	D
		PM	27	C
4	Montana Ave. and Leticia St.	AM	26	D*
		PM	153	F*

**Note: Represents side street approach LOS at intersection*

The delay again increased slightly at each intersection as a result of the background growth. One of the signalized intersections is deficient and experiences decrease in LOS from a D to an E in 2023 during the AM peak hour with the widening of Montana Ave:

- Intersection 1 – Montana Ave. and George Dieter Dr.

The background growth results were compared with the proposed conditions results to determine whether the project impacts the traffic circulation at the intersections.

Proposed Conditions

The proposed facility will be located on a 15 acre site and will be developed in two phases:

- Phase I will include an office-type building with approximately 70,000 square foot area serving 409 employees. Phase I of the development is anticipated to be completed in 2013. The facility will be accessible from two proposed driveways on Montana Ave. between Lee Blvd. and the existing Texas Army National Guard facility.

- Phase II will provide additional office space and 110,000 square feet to serve an additional 441 employees. The combined office space for Phases I and II is approximately 180,000 square feet and 850 employees. The timeframe for Phase II has not been determined, therefore a completion date in 2018 was assumed.

Driveway Coordination with TxDOT

Montana Ave. is a U.S. highway maintained by TxDOT. The proposed driveways will need to be approved by TxDOT's El Paso District. TxDOT's 2011 Access Management Manual sets criteria for driveway spacing and auxiliary lanes (deceleration and acceleration). The manual states that a right turn deceleration lane is required when the speed is greater than 45 mph and the turn volume is greater than 50 vph (vehicles per hour). These values are exceeded with the proposed project and the need for deceleration lanes is anticipated.

TxDOT's Access Review Committee meets periodically to provide approval, disapproval or recommendations to the design. Initial sketches of the proposed driveways (similar to Exhibit 1) were submitted to the Committee as part of this project. Follow-up discussions will be required. The final approval can only be obtained with final engineering drawings.

Trip Generation

Estimated trip generation was determined by using the ITE Trip Generation Manual, 8th Edition. The generated trips were estimated using the general office building land use based on the number of employees. The associated land use fitted curve equation was used to determine the number of trips. The following tables provide the AM and PM peak hour trip generation results. These trips represent the highest hourly volumes generated by the site during the weekday AM and PM peak hours.

Table 7 – Phase I Peak Hour Trip Generation Data

Land Use (ITE Code)	Quantity	AM Peak Hour				PM Peak Hour			
		Rate(Fitted Curve Equation)	Total Trips	IN	OUT	Rate(Fitted Curve Equation)	Total Trips	IN	OUT
General Office Building (710)	409 Employees	Ln(T)=0.86Ln(X) +0.24	224	197	27	Ln(T)=0.37(X) +60.08	211	36	175

Table 8 – Phase II Peak Hour Trip Generation Data

Land Use (ITE Code)	Quantity	AM Peak Hour				PM Peak Hour			
		Rate(Fitted Curve Equation)	Total Trips	IN	OUT	Rate(Fitted Curve Equation)	Total Trips	IN	OUT
General Office Building (710)	850 Employees	Ln(T)=0.86Ln(X) +0.24	420	370	50	Ln(T)=0.37(X) +60.08	375	64	311

Trip Distribution & Assignment

Trip distribution patterns were determined by first identifying where trips are most likely to originate. Data on where employees live was not available so assumptions based on El Paso's layout and growth were used. Due to the rapidly growing east side of El Paso, it is expected that the majority of employees (60 percent) are expected to live on El Paso's East Side. These employees will travel to and from the south and east of the proposed facility. The remaining 40 percent are expected to live in the central, west and northeast areas of El Paso. Montana Ave., Loop 375, and Spur 601 are the primary highways which provide access to the project. Several north-south arterial streets – Saul Kleinfeld Dr., Lee Blvd., George Dieter Dr. – will be used by employees who live closer to the project. Exhibit 6 illustrates the detailed distribution values used for the analysis.

Analysis & Impacts (Phase I)

These generated and distributed trips were added to the background volumes for the 2013 time period. The analysis first assumed that Montana Ave. would not be widened prior to the Phase I opening year. Phase I turning movement volumes are illustrated in Exhibit 7. Cycle lengths were held constant and signal timings were adjusted to represent normal changes due to traffic growth. The LOS and intersection delay for the 2013 AM and PM peak hours are provided in the following table:

Table 9 - LOS Results – Opening Year Phase I - 2013

Int. No.	Intersection	Peak Hour	Int. Delay (sec)	Overall LOS
1	Montana Ave. and George Dieter Dr.	AM	80	E
		PM	38	D
2	Montana Ave. and Lee Blvd.	AM	20	C
		PM	25	C
3	Montana Ave. and Saul Kleinfeld Dr.	AM	59	E
		PM	25	C
4	Montana Ave. and Leticia St.	AM	27	D*
		PM	94	F*

**Note: Represents side street approach LOS at intersection*

All four intersections were impacted by the trips and are discussed below. The City of El Paso criteria were used to evaluate impacts, though City permits and approvals are not anticipated for this project outside the City's jurisdiction.

Intersection 1 – Montana Ave. & George Dieter Dr.

Once the timing is optimized, no additional delay occurs for the AM peak hour, however the LOS decreases from C to D for the PM peak hour. The City requires improvements to return the intersection to LOS C. The westbound left turn movement accommodates 164 vehicles and has the highest delay with 507 seconds, possibly due to the limited green time of 12 seconds for this phase. An additional left turn lane would improve delay to 128 seconds and return the intersection to LOS C with a total intersection delay of 27 seconds. Constructing these improvements would be beyond the scope of this project.

The PM background 2013 westbound left movement results state a LOS F with a delay of 171 seconds and a v/c (volume to capacity) ratio of 1.15. The proposed ICE facility generated an additional 37 vehicles to the westbound left turn approach during the PM peak hour. As a result the LOS remained an F with a delay of 179 seconds and a v/c ratio of 1.19. The generated trips appeared to only have a minor impact to the existing poor operating conditions of this movement.

Intersection 2 – Montana Ave. & Lee Blvd.

The LOS C is acceptable during the AM peak hour.

During the PM peak hour Intersection 2 experiences a high volume of westbound u-turns. Vehicles exiting the facility traveling towards the east side have to make a westbound u-turn at this intersection. The amount of u-turns is nearly triple of the 2013 background volume. The LOS at this intersection is

acceptable but the queue length extends past the existing storage length. The extension of the storage length is recommended to accommodate the additional traffic volumes. Illustrations of the extended storage lengths are provided in Exhibit 8.

Intersection 3 – Montana Ave. & Saul Kleinfeld Dr.

The LOS decreases from D to E for the AM peak hour. The City requires improvements to return the intersection to LOS D. The northbound left approach has the highest delay with 130 seconds and has a volume of 558 vehicles in the AM peak hour. Left turn volumes of 300 per hour are considered appropriate for dual left turns, and this approach has nearly twice that volume. Additional left turn capacity is required.

Per the design plans for the Texas National Guard facility, this approach will have a dedicated left turn lane and a through lane with the option to turn left. An additional dedicated left turn lane would improve the LOS to a D with 56 seconds of delay. This would create a triple left turn, which is unconventional in El Paso. An acceleration lane to Montana Ave. west of the intersection will be required as part of the improvements to allow for the additional left turn movement. Constructing these improvements would be beyond the scope of this project.

During the AM peak hour intersection 3 experiences a high volume of eastbound left u-turns (nearly triple the 2013 background volumes). According to the trip distribution, the vehicles arriving from the west have to make this u-turn to access the proposed facility. The LOS at this intersection is acceptable but the queue length extends past the existing storage length. Extension of the storage length is recommended to accommodate the additional traffic volumes. Illustrations of the extended storage lengths are provided in Exhibit 8.

Intersection 4 – Montana Ave. & Leticia St.

This unsignalized intersection consists of a northbound approach at a median opening along Montana Ave. The LOS for the northbound approach decreases from C to D in the AM peak hour. The City requires improvements to return the intersection to LOS C. The roadway is wide enough to accommodate three lanes -- a southbound through lane, a northbound left and a northbound right lane. Restriping of this approach would return the LOS to C with 20 seconds of delay.

In the PM peak hour, the northbound approach has a LOS F. The City requires that the project does not to increase the delay beyond the 80 seconds from the 2013 background growth. The restriping improvements considered for the AM peak hour would improve the PM peak hour LOS from an F to an E with 38 seconds of delay.

During the AM peak hour the generated trips increased the delay by only 2 seconds. This resulted in a decrease in LOS from a C to a D. There are no generated trips in or out of Leticia St. The only generated trips at this intersection travel east and west on Montana Ave. During the AM peak hour the eastbound traffic increased by 1% and westbound traffic increased by 4%. The small increased percentages indicate that the generated trips did not have a significant impact on the exiting northbound traffic on Leticia St. The delays on Leticia St. are an existing operational condition. Similar results exist during the PM peak hour conditions.

These mitigations or improvements (illustrated on Exhibit 8) would only be required under the following conditions:

- City of El Paso impact criteria were applied to the project
- Montana Ave. remained as a 4 lane roadway

The widening of Montana Ave. is likely to be approved and implemented in the next several years. The project impacts were reanalyzed using the widened conditions on Montana Ave. The following table compares the City's requirements and project impacts with and without the widening of Montana Ave.

Table 10 – Comparison of Impacts with and without Montana Ave. Widening

Intersection	City Requirement	Project Impacts	Project Impacts + Montana Ave. Widening
1	PM LOS C	PM LOS D	PM LOS C
3	AM LOS D	AM LOS E	AM LOS D
4	AM LOS C	AM LOS D	AM LOS C
	PM LOS F (80 sec delay)	PM LOS F (80 sec delay)	PM LOS D (38 sec delay)

Improvements to Intersections 1, 3, and 4 would not be necessary to meet the City's requirements if TxDOT completes the widening of Montana Ave. The queue lengths and additional u-turns at Intersections 2 and 3 are still a concern due to this project. Extensions to the storage length are recommended.

Analysis & Impacts (Phase II)

The generated trips were added to the background volumes for the 2018 time period and distribution patterns remained the same. Phase II trip distribution is illustrated in Exhibit 10. The analysis assumed that TxDOT would have completed the Montana Ave. widening. Phase II turning movement volumes are illustrated in Exhibit 11. Cycle lengths were held constant and signal timings were adjusted to represent normal changes due to traffic growth. The LOS and intersection delay for the 2018 AM and PM peak hours are provided in the following table:

Table 11 - Phase II 2018 Build-Out and Montana Ave. Widening

Int. No.	Intersection	Peak Hour	Int. Delay (sec)	Overall LOS
1	Montana Ave. and George Dieter Dr.	AM	52	D
		PM	40	D
2	Montana Ave. and Lee Blvd.	AM	20	C
		PM	22	C
3	Montana Ave. and Saul Kleinfeld Dr.	AM	51	D
		PM	28	C
4	Montana Ave. and Leticia St.	AM	23	C*
		PM	115	F*

**Note: Represents side street approach LOS at intersection*

When compared to Phase I opening year, the Phase II LOS and delay showed a significant improvement due to the widening of Montana Ave. The City of El Paso criteria were used to evaluate impacts. When compared to the 2018 background LOS, Intersection 1 showed a decrease in LOS from a C to a D during the PM peak hour and Intersection 2 showed a decrease in LOS from a B to a C during the AM and PM peak hours.

Intersection 1 – Montana Ave. and George Dieter Dr.

During the AM peak hour the LOS remained a D.

During the PM peak hour the LOS decreased from a C to a D. The delay increased by only 5 seconds indicating the intersection had approached its threshold for LOS C and the addition of a few vehicles reduced the LOS to a D. This appears to be an existing operational condition not directly attributed to the project.

Intersection 2 – Montana Ave. and Lee Blvd.

During the AM and PM peak hours the LOS decreased from a B to a C. This intersection experiences a high volume of westbound left turns during the PM peak hour. Trips exiting the site traveling toward the east side will be required to make a u-turn at this intersection as shown in Exhibits 10 and 11. This movement saw a 56 percent increase in volume from Phase I. According to the City, a LOS of C is acceptable however; the delays experienced by this movement are at 69 seconds during the PM peak hour showing this movement is almost at capacity.

Intersection 3 – Montana Ave. and Saul Kleinfeld Dr.

During the AM and PM peak hours the LOS remained a D and a C. During the AM peak hour the eastbound left turn movement experiences a high volume. Trips entering from the west have to make a u-turn at this intersection to access the site as shown in Exhibits 10 and 11. This movement saw a 56 percent increase in

volume from phase I. According to the City, the LOS is acceptable however; the delays experienced by this movement are at 67 seconds during the AM peak hour showing this movement is almost at capacity.

Intersection 4 – Montana Ave. and Leticia St.

LOS remained an F. The City requires the delay not to exceed 85 seconds. As mentioned in Phase I impacts, the delays at this intersection are due to the existing operational conditions and are not significantly impacted by this project.

Driveway at Lee Blvd.

A potential measure to reduce the delays at Intersection 2 (westbound left movement) and Intersection 3 (eastbound left movement) would be to construct a panhandle driveway from the proposed site, creating a fourth leg at Lee Blvd. Refer to Exhibit 9 for Phase II site plan with driveway at Lee Blvd. This driveway would accommodate trips entering the site in the AM peak hour and leaving the site in the PM peak hour. U-turns would be minimized and the left turn movement delays would decrease. The trip distribution changes at Intersections 2 and 3 as a result. The vehicles previously making a u-turn at Intersection 3 to enter the site in the AM peak hour will now turn left at Lee Blvd. The vehicles previously making a u-turn at Intersection 2 to exit the site in the PM peak hour will now exit left from the Lee Blvd. driveway. Refer to Exhibit 12 for the trip distribution and assignment associated with the driveway at Lee Blvd. Exhibit 13 illustrates the turning movement volumes with the driveway at Lee Blvd. The following table provides LOS results with the driveway.

Table 12 - Phase II 2018 Build-Out with Lee Blvd. Driveway and Montana Ave. Widening

Int. No.	Intersection	Peak Hour	Int. Delay (sec)	Overall LOS
1	Montana Ave. and George Dieter Dr.	AM	55	E
		PM	40	D
2	Montana Ave. and Lee Blvd.	AM	44	D
		PM	29	C
3	Montana Ave. and Saul Kleinfeld Dr.	AM	38	D
		PM	27	C
4	Montana Ave. and Leticia St.	AM	23	C*
		PM	115	F*

**Note: Represents side street approach LOS at intersection*

The Phase II impacts were compared against the 2018 Build-out with Montana Ave. widening delay and LOS. Intersections 1 and 2 showed the greatest impact by the trips and are discussed below. The City of El Paso criteria were used to evaluate impacts.

Intersection 1 – Montana Ave. and George Dieter Dr.

During the AM peak hour the LOS decreased from a D to an E. The City requires the LOS to be returned to a D. The delay increased by only 3 seconds indicating the intersection had reached its threshold for LOS D. This appears to be an existing operational condition not directly attributed to the proposed trip generation.

Intersection 2 – Montana Ave. and Lee Blvd.

During the AM peak hour the LOS decreased from a C to a D. This can be attributed to the fourth leg at the intersection. The extension requires green time for the southbound movement at the expense of the eastbound and westbound movements. Green time for the eastbound westbound movements was reduced to provide green time for the southbound movement.

The City requires the LOS to be returned to a C, however the safety benefits associated with the reduced u-turns may be an acceptable trade-off for the level of service. When the Phase II project is implemented, the analysis should be updated and the detailed results should be discussed with the City to reach a suitable compromise.

Intersection 3 – Montana Ave. and Saul Kleinfeld Dr.

LOS C remained the same and is acceptable.

Intersection 4 – Montana Ave. and Leticia St.

LOS remained an F. The City requires the delay not to exceed 85 seconds. As mentioned in phase I impacts, the delays at this intersection are due to the existing operational conditions and are not significantly impacted by this project.

Analysis & Impacts (2023)

The generated trips were added to the background volumes for the 2023 time period five years after build out. The distribution patterns remained the same as Phase II with Lee Blvd. driveway. The analysis assumed that TxDOT would have completed the Montana Ave. widening. Cycle lengths were held constant and signal timings were adjusted to represent normal changes due to traffic growth. The LOS and intersection delay for the 2023 AM and PM peak hours are provided in the following table:

Table 13 – 2023 with Lee Blvd. Driveway and Montana Ave. Widening

Int. No.	Intersection	Peak Hour	Int. Delay (sec)	Overall LOS
1	Montana Ave. and George Dieter Dr.	AM	62	E
		PM	52	D
2	Montana Ave. and Lee Blvd.	AM	62	E
		PM	38	D
3	Montana Ave. and Saul Kleinfeld Dr.	AM	40	D
		PM	31	C
4	Montana Ave. and Leticia St.	AM	28	D*
		PM	213	F*

**Note: Represents side street approach LOS at intersection*

The 2023 impacts were compared against the 2023 background delay and LOS. All the intersections showed a decrease in delay associated with the added generated movements. Intersection 2 showed the greatest impact by the trips and is discussed below. The City of El Paso criteria were used to evaluate impacts. Refer to Exhibit 14 for 2023 project turning movement counts.

Intersection 1 – Montana Ave. and George Dieter Dr.

During the AM and PM peak hour the LOS remained an E and a D. The LOS is acceptable according the City criteria. As mentioned in Phase I and II this intersection appears to have an existing poor operational condition not directly attributed to the proposed trip generation.

Intersection 2 – Montana Ave. and Lee Blvd.

During the AM peak hour the LOS decreased from a B to an E. During the PM peak hour the LOS decreased from a B to a D. This can be attributed to the fourth leg at the intersection. The extension requires green time for the southbound movement at the expense of the eastbound and westbound movements. Green time for the eastbound westbound movements was reduced to provide green time for the southbound movement.

The City requires the LOS to be returned to a C, however the safety benefits associated with the reduced u-turns may be an acceptable trade-off for the level of service. When the Phase II project is implemented, the analysis should be updated and the detailed results should be discussed with the City to reach a suitable compromise.

Intersection 3 – Montana Ave. and Saul Kleinfeld Dr.

During the AM and PM peak hours the LOS remained a D and a C, and is acceptable.

Intersection 4 – Montana Ave. and Leticia St.

LOS remained an F. The City requires the delay not to exceed 85 seconds. As mentioned in phase I impacts, the delays at this intersection are due to the existing operational conditions and are not significantly impacted by this project.

Conclusions and Recommendations

Existing, background and project conditions were analyzed for 2011, 2013, 2018, and 2023. The 2011 existing conditions were analyzed and it was determined that Intersections #1 and #4 were already experiencing a LOS D or worse and should not require mitigation improvements.

The traffic counts were compared to the 2009 historic counts and a decrease in traffic volume on Montana Ave. was noticed. This decrease was attributed to the opening of Spur 601 which provides a direct route from Loop 375 to US-54. As a result the traffic volume growth rate will increase at a much slower rate than before. Based on the available area for development along Montana Ave. and opening of Spur 601, a low to moderate growth rate of 1.5 percent per year was applied to estimate future traffic volumes for the 2013, 2018, and 2023 background models.

The widening of Montana Ave. from four lanes to six lanes is likely to be approved and implemented over the next several years. The 2013 background model was analyzed with and without the Montana Ave. widening. The widening has a significant improvement on the LOS and delay at the study area intersections. The analysis of the 2013 project conditions assumed the widening would not be completed by that time; while the 2018 and 2023 analysis assume the widening to be completed.

The project generated trips were added to the background volumes for 2013, 2018, 2023 and analyzed to determine the deficient intersections. Impacts were evaluated using the City of El Paso criteria, though City permits and approvals are not needed.

The 2013 Phase I project condition analysis determined the following improvements should be considered at Intersections #1, #2, #3 and #4:

Intersection #1 improvements

- An additional westbound left turn lane

Intersection #2 improvements

- Extend westbound left storage length

Intersection #3 improvements

- Widen Saul Kleinfeld Dr. to accommodate an additional left turn lane
- Provide a 12 ft acceleration lane on north side of intersection on Montana Ave.

Intersection #4 improvements

- Extend westbound left storage length
- Restriping the northbound approach to accommodate both northbound right and northbound through lanes

If the Montana Ave. widening is implemented before 2013 Phase I, the conditions will improve and the only the following improvements should be considered for Intersections #1, #2, and #3:

Intersection #1 improvements

- Extend westbound left storage length

Intersection #2 improvements

- Extend westbound left storage length

Intersection #3 improvements

- Extend eastbound left storage length

The 2018 Phase II project condition analysis determined the following improvements should be considered at Intersection #2:

Intersection #2 improvements

- Driveway at Lee Blvd.

In 2018, in addition to the improvements at Intersection #2, additional items include updating the traffic study, and discussing the results with the City of El Paso to reach a suitable compromise.

All driveways onto Montana Ave. require approvals from TxDOT.

US Army Corps of Engineers
Fort Worth District

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT FACILITY

MONTANA AVE.
EL PASO, TEXAS

HUITT-ZOLLARS INC.

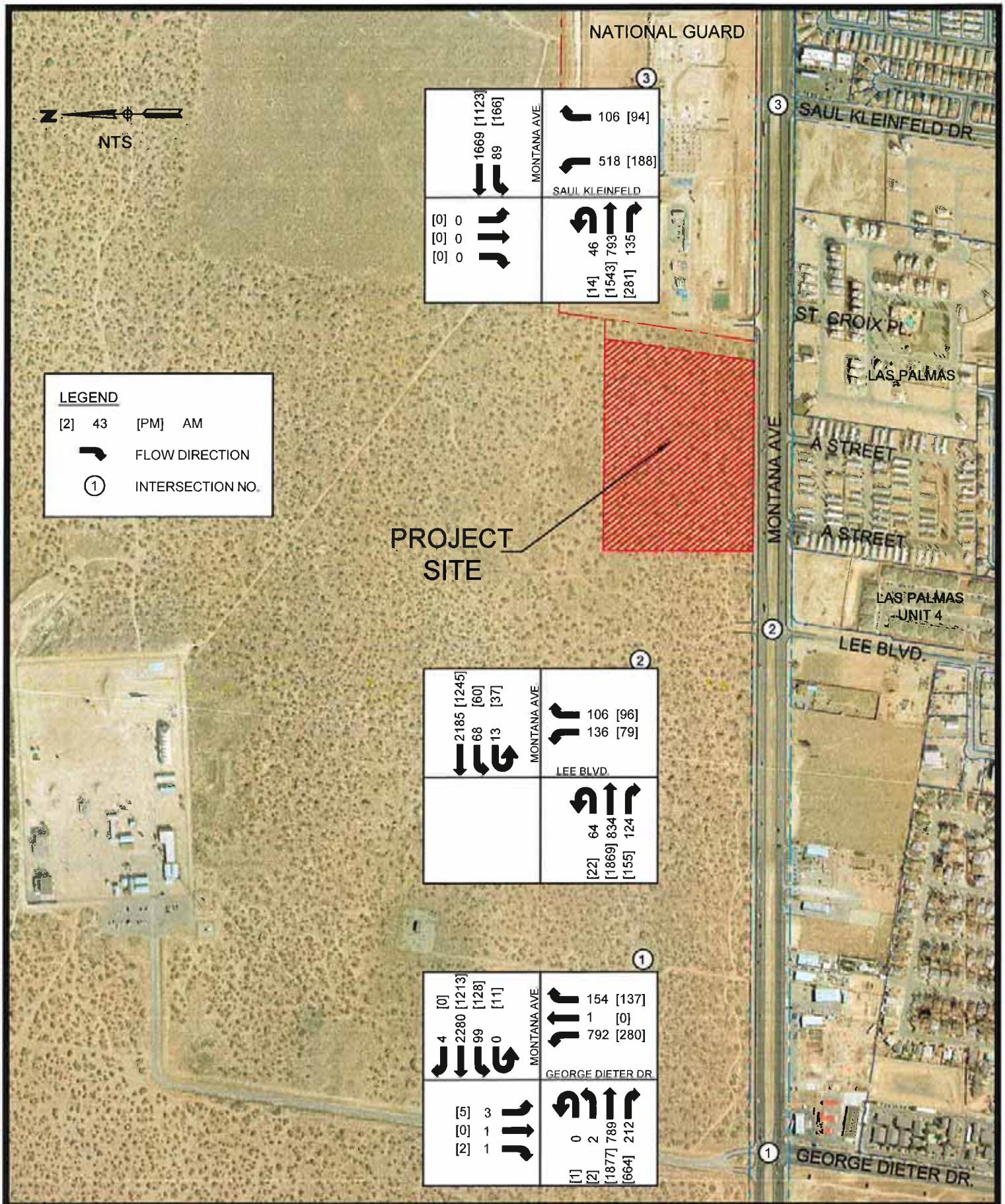
ENGINEERING / SURVEYING
5822 CROMO DR., SUITE 210
EL PASO, TEXAS 79912
PH. (915) 587-4339 / FAX (915) 587-5247
FIRM REGISTRATION F-761

ICE PROJECT TRAFFIC IMPACT STUDY
EL PASO, TEXAS

JOB NO.
03124910

PHASE I
SITE PLAN
2013

EXHIBIT
1



US Army Corps of Engineers
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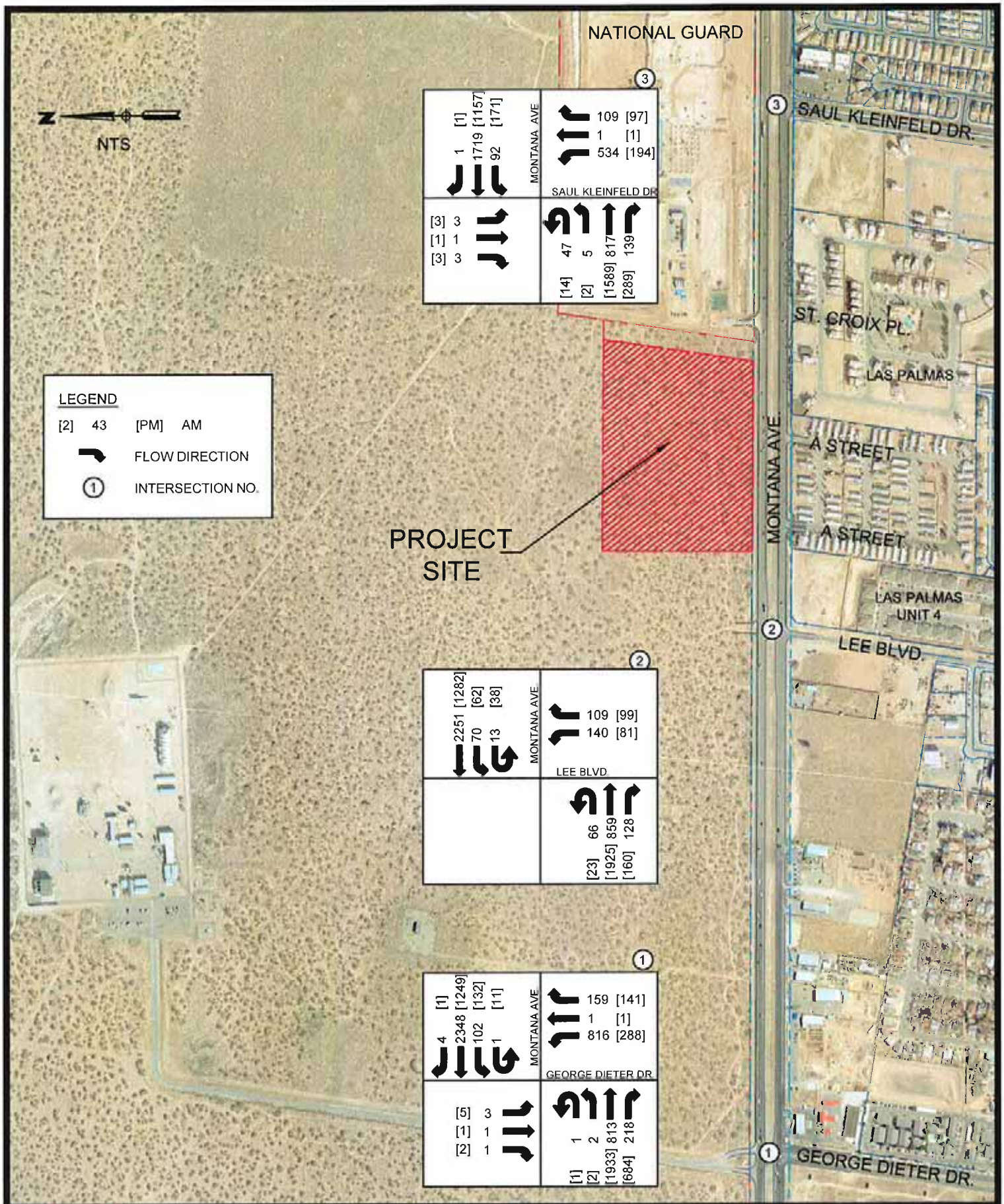
ICE PROJECT TRAFFIC IMPACT STUDY
EL PASO, TEXAS

JOB NO. 03124910

EXISTING TURNING MOVEMENT COUNTS
2011

EXHIBIT 2



US Army Corps of Engineers
Fort Worth District

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT FACILITY

MONTANA AVE.
EL PASO, TEXAS

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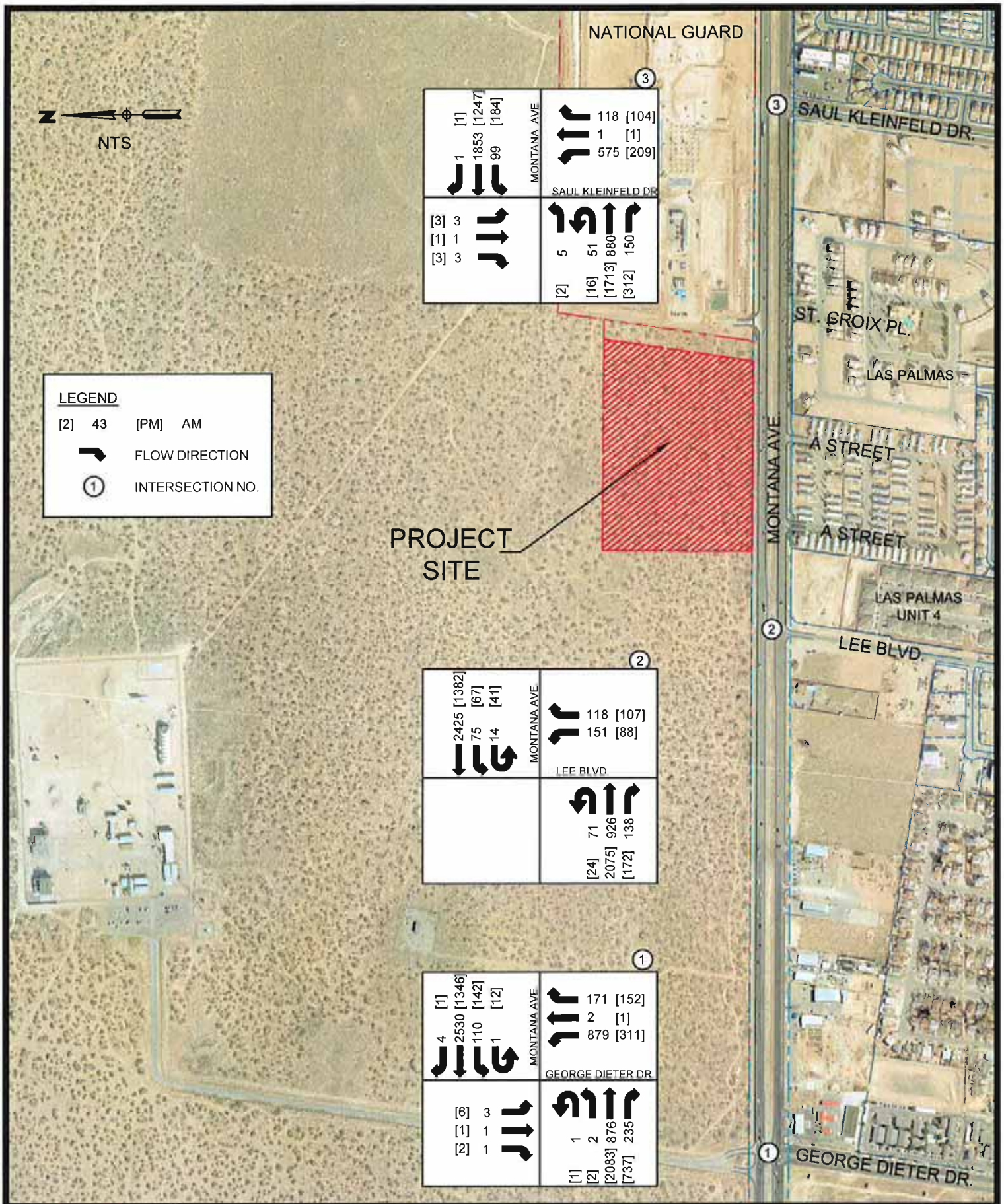
ICE PROJECT TRAFFIC IMPACT STUDY
EL PASO, TEXAS

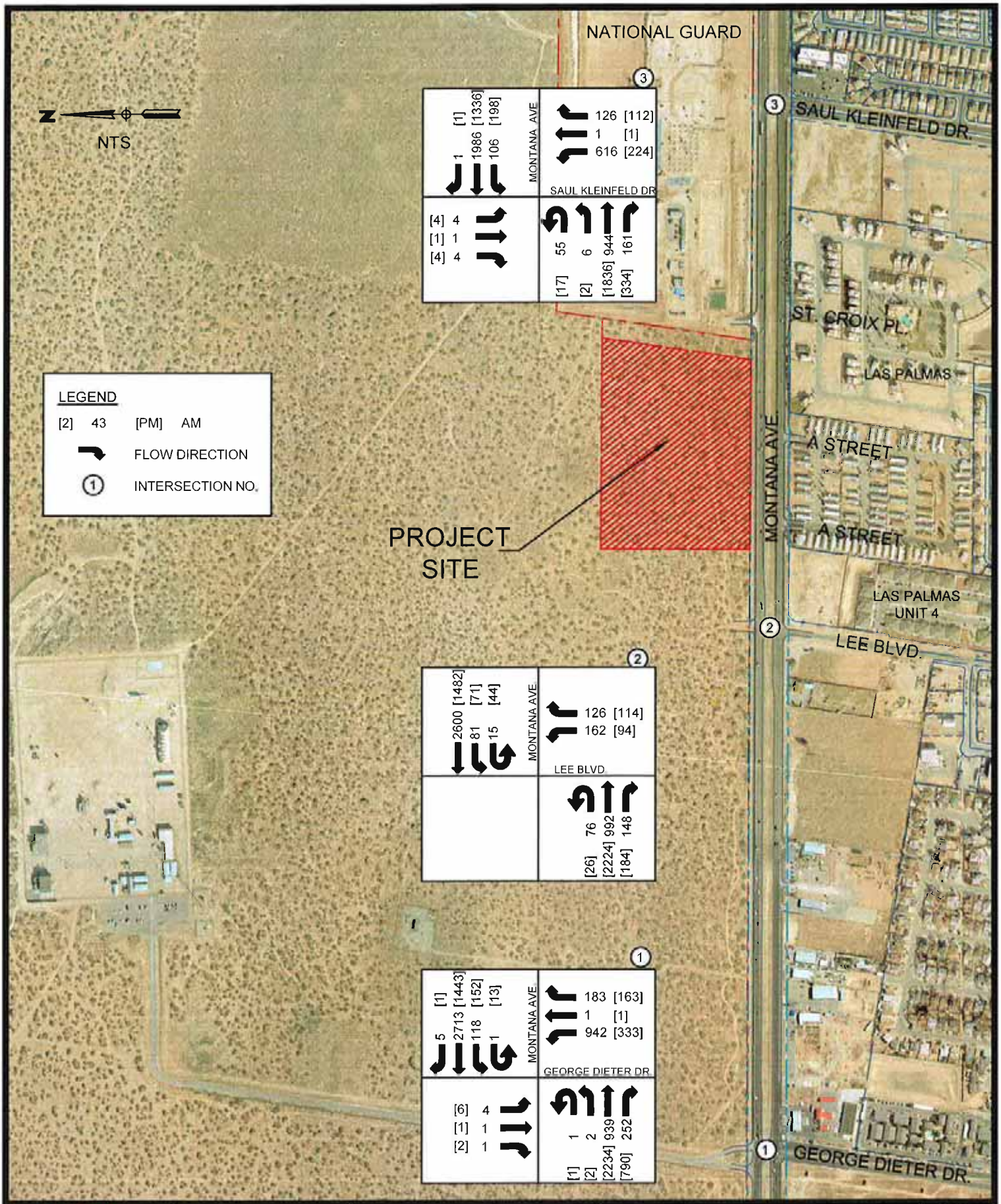
JOB NO. 03124910

BACKGROUND
TURNING MOVEMENT COUNTS
2013

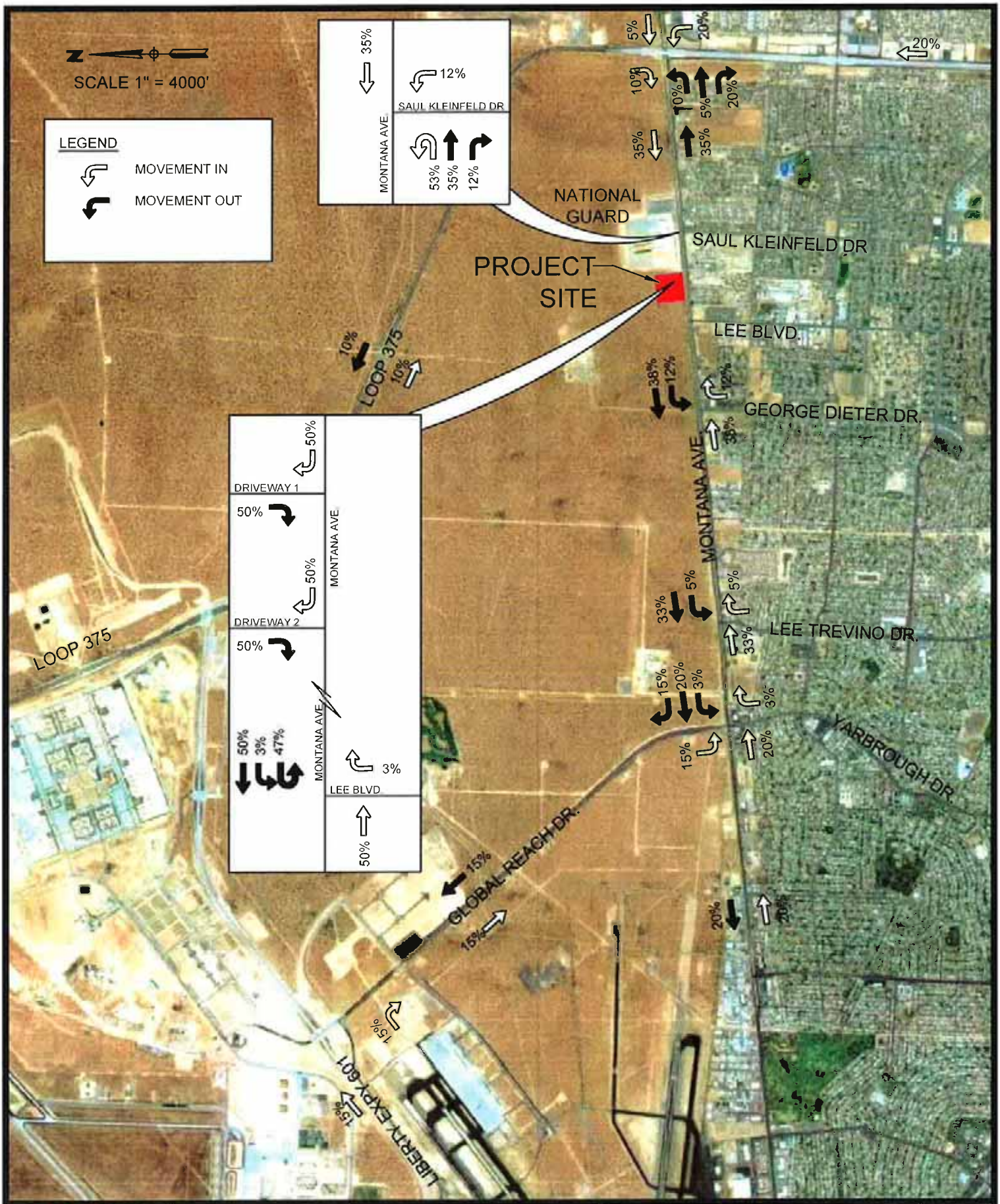
EXHIBIT 3



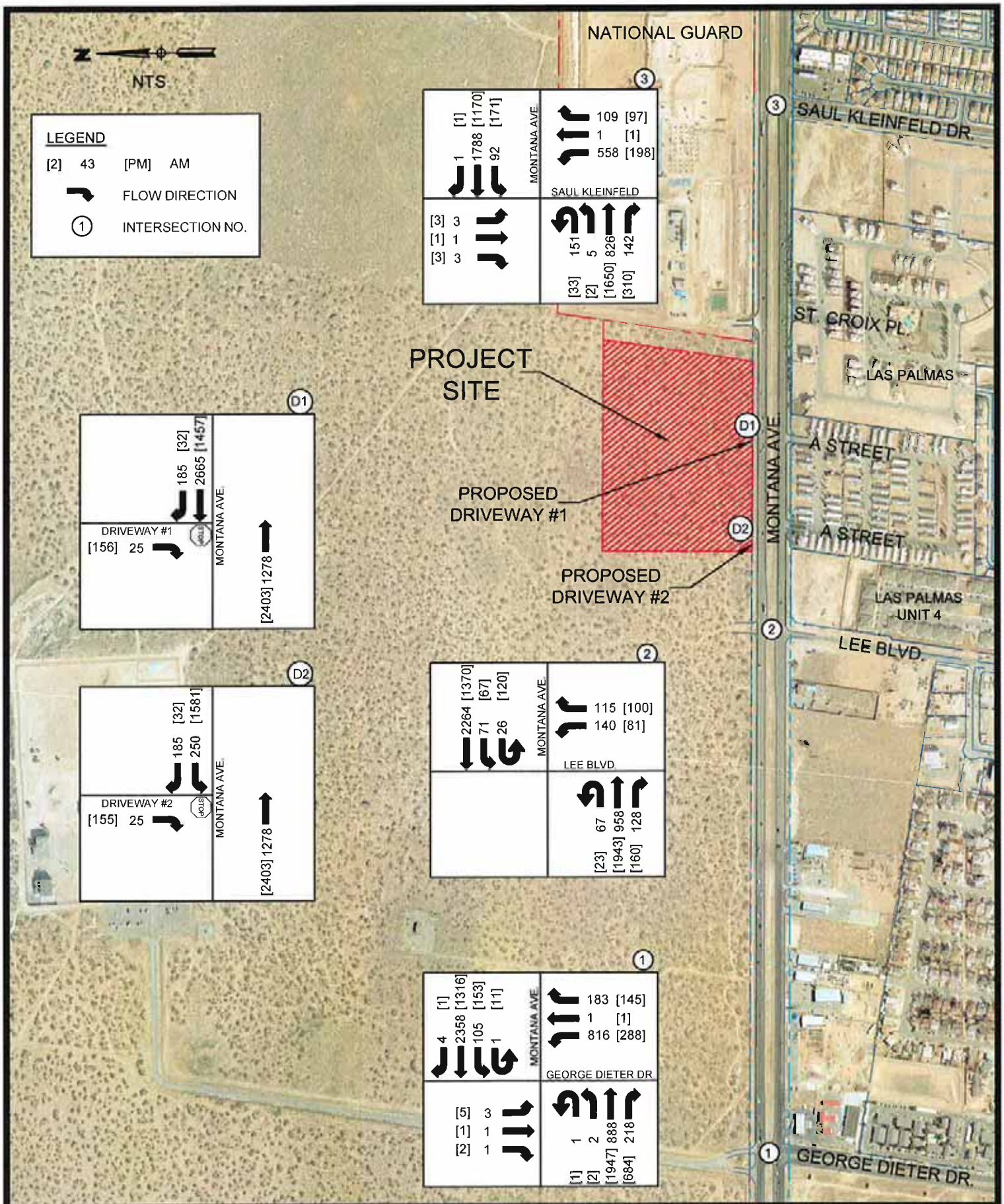
US Army Corps of Engineers Fort Worth District	U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT FACILITY MONTANA AVE. EL PASO, TEXAS	HUITT-ZOLLARS INC. ENGINEERING / SURVEYING 5822 CROMO DR., SUITE 210 EL PASO, TEXAS 79912 PH. (915) 587-4339 / FAX (915) 587-5247 FIRM REGISTRATION F-761	ICE PROJECT TRAFFIC IMPACT STUDY EL PASO, TEXAS BACKGROUND TURNING MOVEMENT COUNTS 2018	JOB NO. 03124910 EXHIBIT 4



US Army Corps of Engineers Fort Worth District	U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT FACILITY MONTANA AVE. EL PASO, TEXAS	HUITT-ZOLLARS INC. ENGINEERING / SURVEYING 5822 CROMO DR., SUITE 210 EL PASO, TEXAS 79912 PH. (915) 587-4339 / FAX (915) 587-5247 FIRM REGISTRATION F-761	ICE PROJECT TRAFFIC IMPACT STUDY EL PASO, TEXAS BACKGROUND TURNING MOVEMENT COUNTS 2023	JOB NO. 03124910 EXHIBIT 5



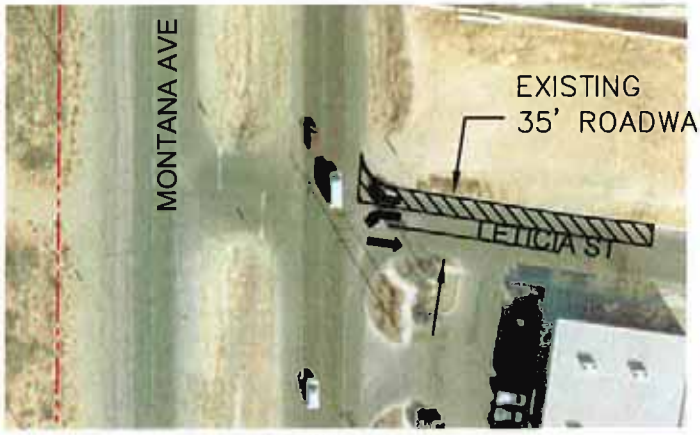
US Army Corps of Engineers Fort Worth District	U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT FACILITY MONTANA AVE. EL PASO, TEXAS	HUITT-ZOLLARS INC. ENGINEERING / SURVEYING 5822 CROMO DR., SUITE 210 EL PASO, TEXAS 79912 PH. (915) 587-4339 / FAX (915) 587-5247 FIRM REGISTRATION F-761	ICE PROJECT TRAFFIC IMPACT STUDY EL PASO, TEXAS PHASE I TRIP DISTRIBUTION 2013	JOB NO. 03124910 EXHIBIT 6



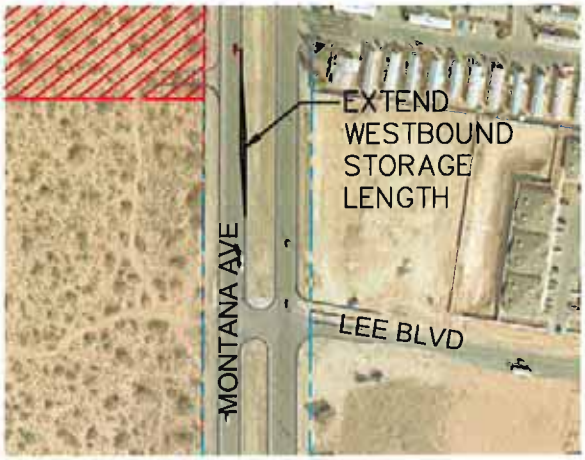
US Army Corps of Engineers Fort Worth District	U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT FACILITY MONTANA AVE. EL PASO, TEXAS	HUITT-ZOLLARS INC. ENGINEERING / SURVEYING 5822 CROMO DR., SUITE 210 EL PASO, TEXAS 79912 PH. (915) 587-4339 / FAX (915) 587-5247 FIRM REGISTRATION F-761	ICE PROJECT TRAFFIC IMPACT STUDY EL PASO, TEXAS PHASE I TURNING MOVEMENT COUNTS 2013	JOB NO. 03124910 EXHIBIT 7

INTERSECTION #4
MONTANA AVE. & LETICIA ST

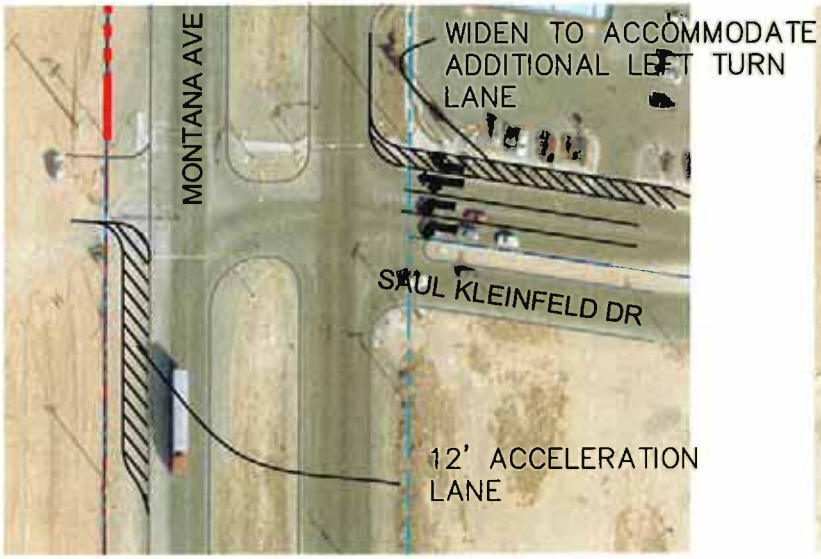
NTS



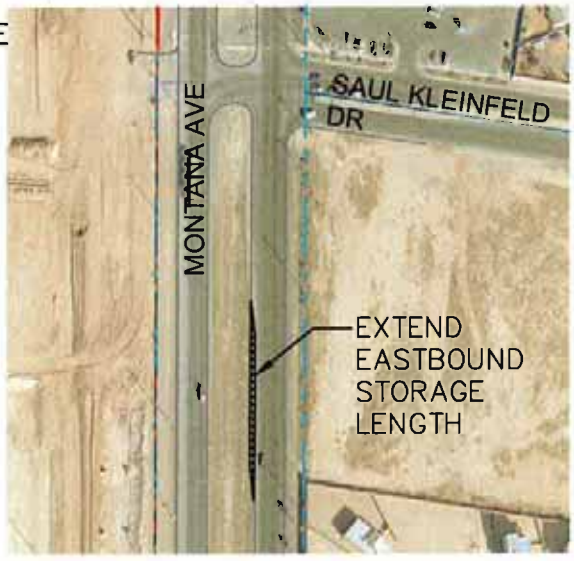
INTERSECTION #2
MONTANA AVE. & LEE BLVD



INTERSECTION #3
MONTANA AVE. & SAUL KLEINFELD DR



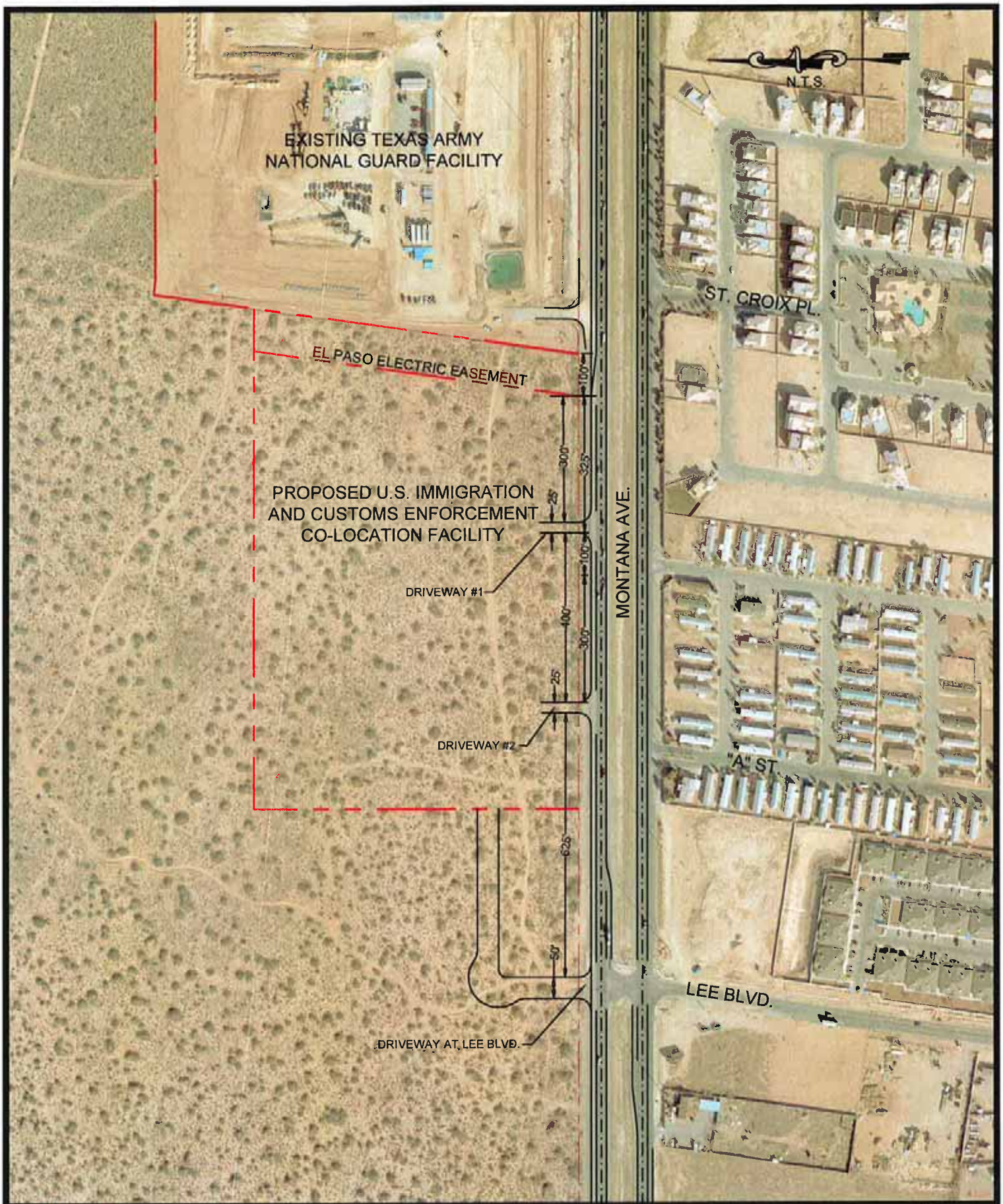
INTERSECTION #3
MONTANA AVE. & SAUL KLEINFELD DR



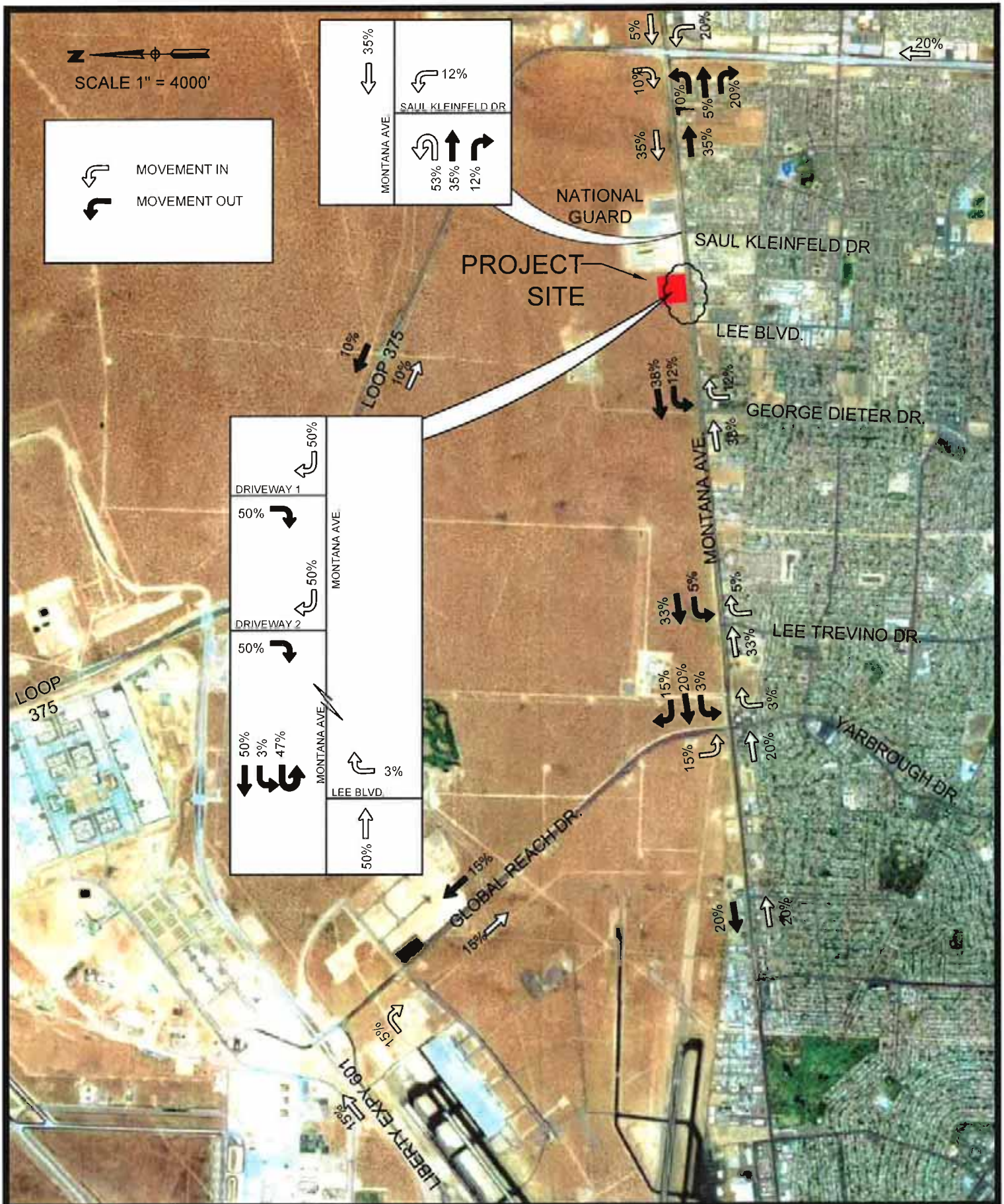
INTERSECTION #1
MONTANA AVE. & GEORGE DIETER DR

INTERSECTION #1
MONTANA AVE. & GEORGE DIETER DR

US Army Corps of Engineers Fort Worth District	U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT FACILITY MONTANA AVE EL PASO, TEXAS	HUITT-ZOLLARS INC. ENGINEERING / SURVEYING 5822 CROMO DR., SUITE 210 EL PASO, TEXAS 79912 PH. (915) 587-4339 / FAX (915) 587-5247 FIRM REGISTRATION F-761	ICE PROJECT TRAFFIC IMPACT STUDY EL PASO, TEXAS PHASE I MITIGATION WITHOUT MONTANA AVE WIDENING	JOB NO. 03124910 EXHIBIT 8



US Army Corps of Engineers Fort Worth District	U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT FACILITY MONTANA AVE. EL PASO, TEXAS	HUITT-ZOLLARS INC. ENGINEERING / SURVEYING 5822 CROMO DR., SUITE 210 EL PASO, TEXAS 79912 PH. (915) 587-4339 / FAX (915) 587-5247 FIRM REGISTRATION F-761	ICE PROJECT TRAFFIC IMPACT STUDY EL PASO, TEXAS PHASE II SITE PLAN 2018	JOB NO. 03124910 EXHIBIT 9



US Army Corps of Engineers
Fort Worth District

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT FACILITY
MONTANA AVE.
EL PASO, TEXAS

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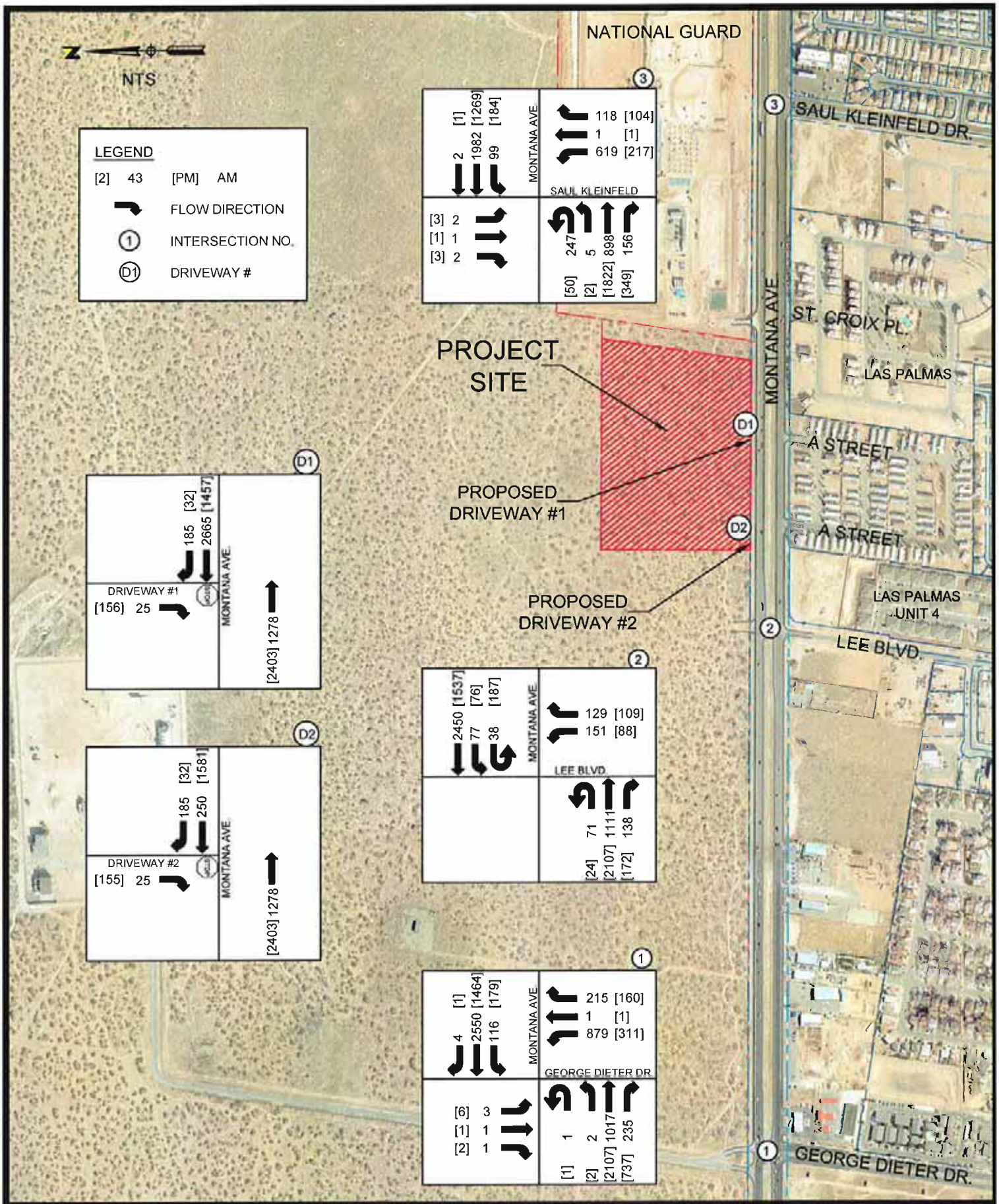
FIRM REGISTRATION F-761

ICE PROJECT TRAFFIC IMPACT STUDY
EL PASO, TEXAS

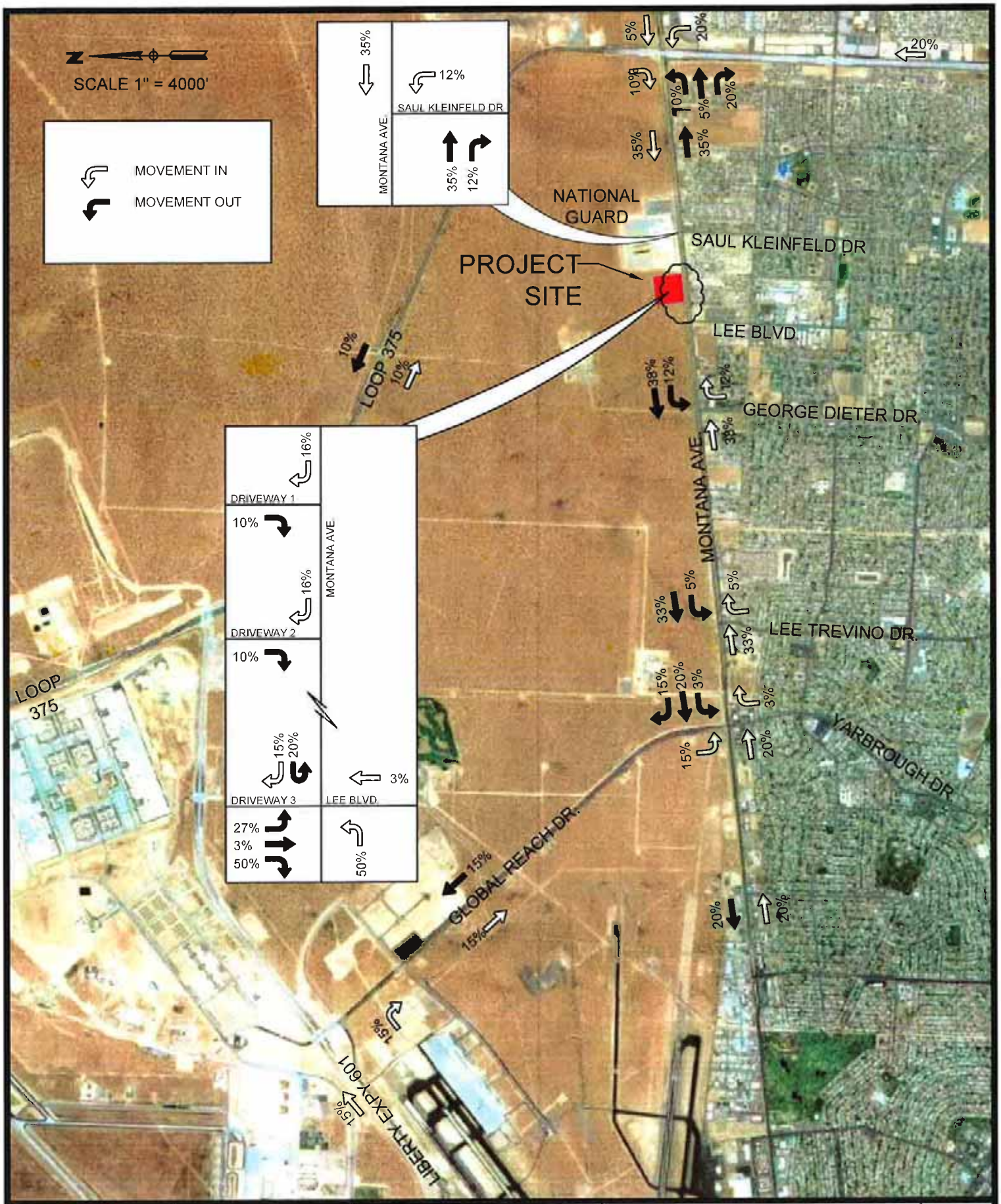
JOB NO. 03124910

PHASE II
TRIP DISTRIBUTION
2018

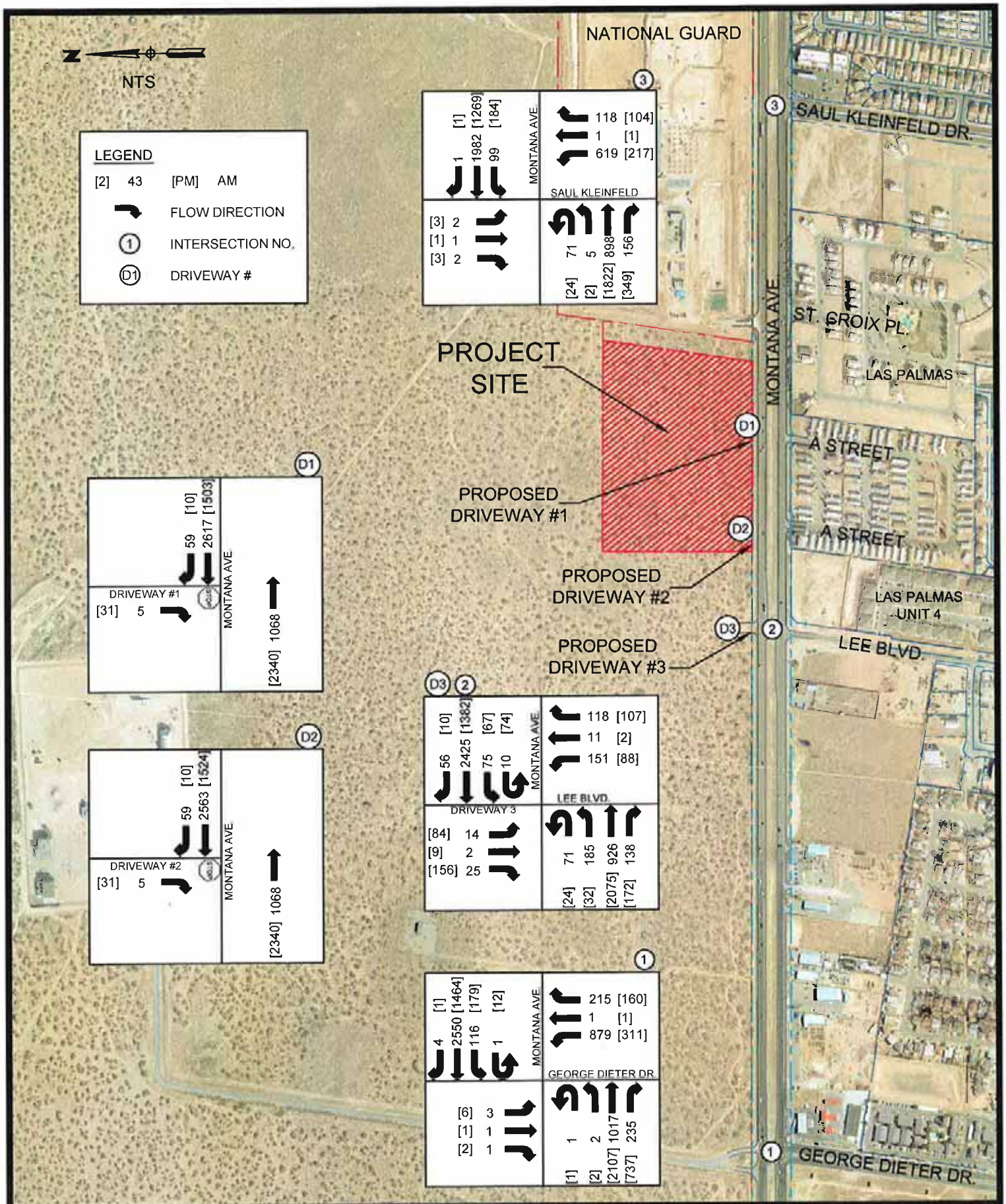
EXHIBIT 10



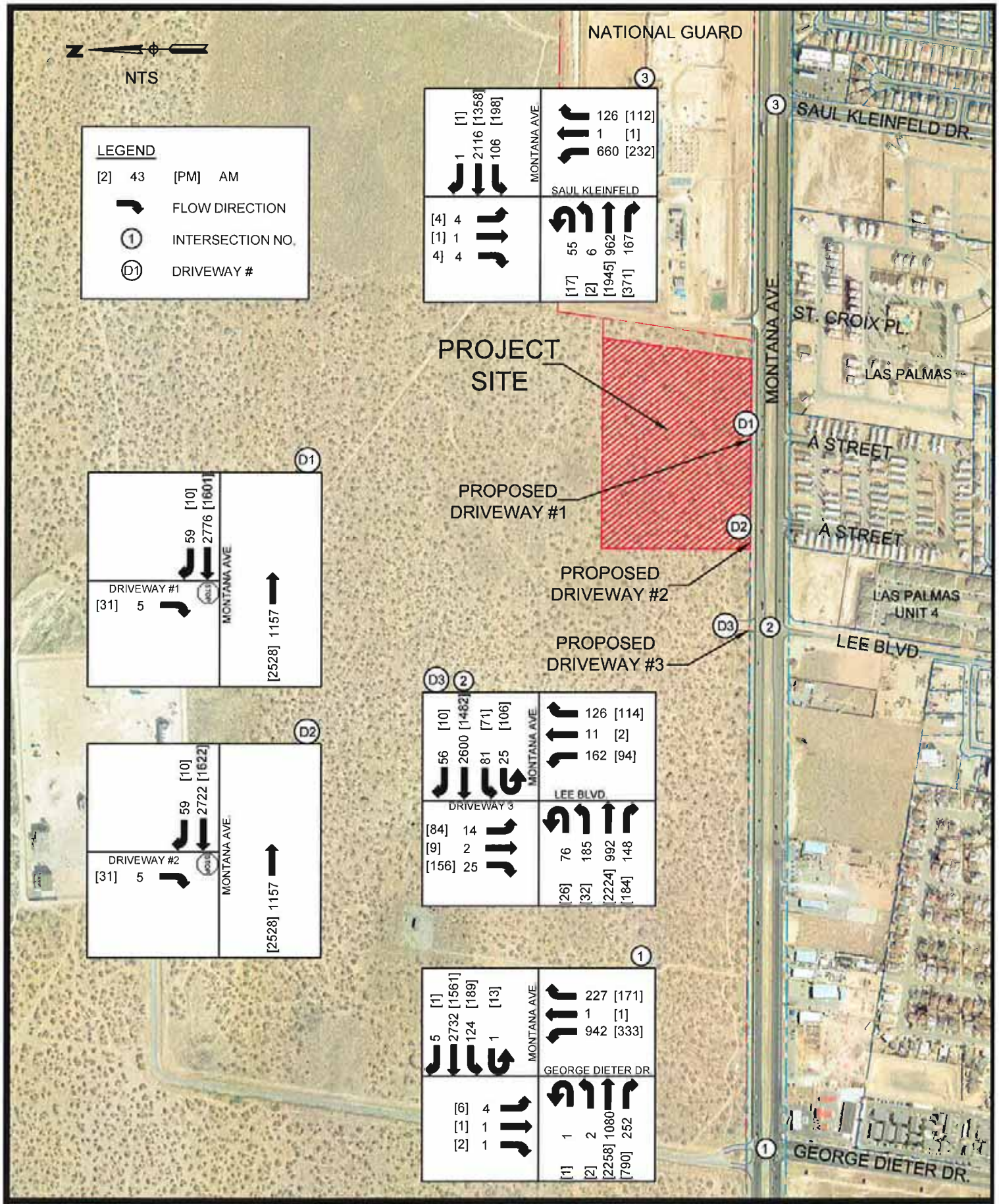
US Army Corps of Engineers Fort Worth District	U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT FACILITY MONTANA AVE. EL PASO, TEXAS	HUITT-ZOLLARS INC. ENGINEERING / SURVEYING 5822 CROMO DR., SUITE 210 EL PASO, TEXAS 79912 PH. (915) 587-4339 / FAX (915) 587-5247 FIRM REGISTRATION F-761	ICE PROJECT TRAFFIC IMPACT STUDY EL PASO, TEXAS PHASE II TURNING MOVEMENT COUNTS 2018	JOB NO. 03124910 EXHIBIT 11



US Army Corps of Engineers Fort Worth District	U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT FACILITY MONTANA AVE. EL PASO, TEXAS	HUITT-ZOLLARS INC. ENGINEERING / SURVEYING 5622 CROMO DR., SUITE 210 EL PASO, TEXAS 79912 PH. (915) 587-4339 / FAX (915) 587-5247 FIRM REGISTRATION F-761	ICE PROJECT TRAFFIC IMPACT STUDY EL PASO, TEXAS PHASE II TRIP DISTRIBUTION LEE BLVD DRIVEWAY 2018	JOB NO. 03124910 EXHIBIT 12



US Army Corps of Engineers Fort Worth District	U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT FACILITY MONTANA AVE. EL PASO, TEXAS	HUITT-ZOLLARS INC. ENGINEERING / SURVEYING 5822 CROMO DR., SUITE 210 EL PASO, TEXAS 79912 PH. (915) 587-4339 / FAX (915) 587-5247 FIRM REGISTRATION F-761	ICE PROJECT TRAFFIC IMPACT STUDY EL PASO, TEXAS PHASE II TURNING MOVEMENT COUNTS LEE BLVD DRIVEWAY 2018	JOB NO. 03124910 EXHIBIT 13



US Army Corps of Engineers
Fort Worth District

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT FACILITY
MONTANA AVE.
EL PASO, TEXAS

HUITT-ZOLLARS INC.
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PH. (915) 587-4339 / FAX (915) 587-5247
FIRM REGISTRATION F-761

ICE PROJECT TRAFFIC IMPACT STUDY
EL PASO, TEXAS

FIVE YEARS AFTER BUILD-OUT
TURNING MOVEMENT COUNTS
2023

JOB NO. 03124910

EXHIBIT 14