CHAPTER 5 – COMMENTS AND COORDINATION

5.1 INTRODUCTION

Early and continuing coordination with the general public agencies is an essential part of the environmental process to determine the scope of environmental documentation; the level of analysis; potential impacts; avoidance, minimization and mitigation measures; and related environmental requirements. Agency consultation and public participation for the Revised Project have been accomplished through a variety of formal and informal methods, including meetings, interagency coordination, and the public scoping process. This chapter summarizes the results of GSA’s efforts to fully identify, address, and resolve Revised Project-related issues through early and continuing consultation.

5.2 PUBLIC SCOPING PROCESS

5.2.1 Notice of Intent

Pursuant to NEPA, an NOI was prepared for the Revised Project and published in Vol. 78, No. 84 of the Federal Register on Wednesday, May 1, 2013. The NOI invited agencies and the public to submit comments regarding the scope of the SEIS. During the public comment period for the scoping process (May 9, 2013 through June 9, 2013), which included the public scoping meeting, comment forms, letters and e-mails were received from a total of 12 commenters. Public agencies, organizations, businesses and individuals submitting comments on the Revised Project are listed below.

- U.S. Environmental Protection Agency – Region IX (letter)
- San Diego Association of Governments (letter)
- City of San Diego – Bicycle Program (e-mail)
- Jason Wells, San Ysidro Smart Border Coalition (letter)
- Josie Calderon Scott, Mexican American Business and Professional Association (comment form and letter)
- Lisa Cuestes, Casa Familiar (comment form)
- Armando Murillo, Casa Familiar (comment form)
- David Flores, Casa Familiar (multiple comment forms)
- Francisco Bates, Bricehouse (comment form)
- M. Iqbal, Chase USA International (comment form)
- Luis Matus, Quality Suites (e-mail)
- Steve Otto, Resident (comment form)

A summary of the comments and issues raised by each commenter is provided below.

United States Environmental Protection Agency

The USEPA requested that outstanding air quality issues outlined in their Final EIS comment letter be addressed during the SEIS process. Additionally, the scoping comment letter
requested that the SEIS include pedestrian analysis and that the Revised Project be consistent with Complete Streets criteria and include multi-modal connections at the proposed Virginia Avenue pedestrian crossing.

The San Diego Association of Governments (SANDAG)

SANDAG recommended the following:

- That the traffic analysis consider the needs of motorists, transit riders, pedestrians, and bicyclists, and the implementation of a robust Transportation Demand Management (TDM) Program;
- Consideration of the Complete Streets Act of 2008, and the region's TransNet Extension Ordinance which requires accommodation of bicyclists and pedestrians in most TransNet funded projects;
- The addition of language to the description of project alternatives in the NOI to include the Virginia Avenue Transit Center;
- Consideration in the SEIS of findings presented in *White Paper: Health Impacts of Crossings at U.S. Mexico Land Ports of Entry: Gaps, Needs and Recommendations for Action (2012)*, including findings related to buffer zones between roadways and communities/pedestrians, and the provision of basic amenities for pedestrians and cyclists;
- Consideration of safe bicycle access and bike parking;
- Coordination with the *San Ysidro Intermodal Transit Center Study* currently under development;
- Consultation with MTS and Caltrans;
- Consideration of specified State of California Laws and Executive orders;
- Consideration of policies included in the SANDAG Regional Energy Strategy;
- Consideration of the use of a suite of tools found on the SANDAG website in evaluating the Revised Project.

City of San Diego - Bicycle Program

The City requested that a bicycle-friendly crossing at the Virginia Avenue pedestrian crossing be provided, along with connections to bikeways on both sides of the border.

Jason Wells, The San Ysidro Smart Border Coalition

The Smart Border Coalition requested that a bicycle-friendly crossing be provided at the Virginia Avenue pedestrian crossing.

Josie Calderon-Scott, Mexican American Business and Professional Association (MABPA)

The MABPA requested that a bicycle-friendly crossing be provided at the Virginia Avenue pedestrian crossing, along with connections to bikeways on both sides of the border.
Lisa Cuestes, Casa Familiar

Lisa Cuestes expressed concerns about the following:

- Whether air quality monitoring would be conducted at locations (schools, parks, apartment complexes) less than one mile from the border crossing;
- The inclusion in the EIS of impacts to individuals caused by increased emissions due to southbound inspections;
- Whether the project would include the facilitation of bicycle traffic to and from the border.

Armando Murillo, Casa Familiar

Armando Murillo requested that the following be addressed:

- Include a bike path and border checkpoint for bicycles.
- Clean and monitor air quality for all cars.
- Reduce air pollution at nearby schools, parks, homes, apartments, community, and CBP work stations.
- Since CBP operations do not function without Phase 2, need to address what will happen in the mean time.

David Flores, Casa Familiar

David Flores expressed concerns about the following:

- The inclusion or lack of a bicycle inspection processing lane.
- The potential air quality impacts to students and staff at Willow Elementary School during southbound inspections.
- The need for air quality monitoring during southbound inspections.
- The constitutionality of southbound inspections.
- The funding time frame for Phase 2 – not implementing Phase 2 does not work operationally for CBP, and has effects on pedestrians.
- How diesel exhaust and pollutants would be controlled while buses are queuing.

Francisco Bates, Bricehouse

Francisco Bates requested that a dedicated bike crossing facility for registered/licensed bikes be provided at the Virginia Avenue crossing.

M. Iqbal, Chase USA International

M. Iqbal expressed general support for the project, and his opinion that there is an overall need to make the border crossing easier.
Luis Matus, Quality Suites

Luis Matus expressed general support for the project, and his opinion that it will benefit both San Ysidro and the larger region, reactivating tourism.

Steve Otto, Resident

Steve Otto requested the following community improvements be included in the project:

- The installation of a signal at the Virginia Avenue/Camino de la Plaza intersection;
- The construction of four lanes of pavement and installation of enhanced sidewalk on northeast side;
- The inclusion of a dedicated bike crossing facility (northbound and southbound);
- The construction of a bike lane from the Virginia Avenue pedestrian crossing to connect to the north to the Bayshore Bikeway (currently there is a gap from I-5/Palm Avenue to I-5/Dairy Mart Road).

5.2.2 Public Scoping Meeting

A public scoping meeting was held on May 9, 2013 from 4:00 p.m. to 7:30 p.m. at The Front, located at 147 West San Ysidro Boulevard, San Ysidro, CA 92173, to give the community an opportunity to review and comment on the Revised Project. The notice for the scoping meeting was published in the Federal Register as part of the NOI on May 1, 2013; in the San Diego Union Tribune in English (April 25, 2013); and in its companion publication, Enlace, in Spanish (April 27, 2013). Approximately 35 people attended the scoping meeting. Comments were encouraged, and comment cards were made available at the meeting; Spanish interpretation was also made available. Attendees were mostly residents and business owners in the area, as well as representatives of local community organizations. Government representatives from the city, region, state and federal levels were also present. Attendees provided written comments at the meeting, as well as e-mail and letter comments after the meeting during the public scoping period. The comment period on the NOI ended on June 9, 2013, and as noted in section 5.2.1, Notice of Intent, comments were received from 12 commenters. Input from the public scoping process was considered in the SEIS for the Revised Project.

5.3 CONSULTATION AND COORDINATION WITH PUBLIC AGENCIES

GSA consulted with USFWS on biological resource issues for the Approved Project and for the Revised Project. The USFWS Carlsbad Field Office was contacted in February 2009 to request USFWS’s assessment for potential presence of federally listed threatened, endangered, or proposed for listing species. In June 2013, USFWS was again contacted through their online system to request comparable information for the additional area incorporated into the Revised Project footprint.

GSA will also coordinate with the Corps for any required permits.

The NAHC was contacted for a records search of their Sacred Lands files in December 2008. The results of the search indicated that no sacred lands are recorded in or adjacent to the Approved Project area. Consultation with local Native American tribes was recommended, and a list of Native American contacts was provided. Letters describing the Approved Project and a
map of the study area were mailed to local Native American representatives in January 2009. In May of 2013, the NAHC was again contacted, requesting a search of their Sacred Lands File for the additional APE included in the Revised Project footprint. The results of this search indicated that no known sacred lands or traditional cultural properties are located within the additional APE associated with the Revised Project. Again, a list of Native American tribes and individuals to contact regarding the Project was provided. On May 20, 2013, letters were sent to each of the individuals and tribes listed by the NAHC. To date, no responses have been received.

Per Section 106 of the NHPA, GSA consulted with the SHPO, Advisory Council on Historic Preservation, for the Approved Project, and will continue to consult with the SHPO for the Revised Project.

Ongoing coordination between GSA and CBP has occurred regarding the design of Revised Project. Caltrans, FHWA, SANDAG, and the City have also been consulted in regards to the Revised Project and its interface with transportation and community facilities. Additionally, GSA coordinated with the DOS to obtain a Presidential Permit for the Approved Project; this Presidential Permit would also apply to the Revised Project.

5.4 PUBLIC PARTICIPATION

In addition to the public scoping process described above in Section 5.2, GSA formed a Community Representative Committee (CRC) in 2004, which is comprised of key community representatives and stakeholders. GSA held CRC meetings regularly during the environmental and design phases of the Approved Project. GSA has continued to periodically host CRC meetings to provide updates on the design and construction of the Approved Project, and to discuss and solicit input on the proposed Revised Project modifications. In particular, GSA initiated a collaborative effort with local stakeholders and public agencies to develop a concept for the proposed Virginia Avenue Transit Facility, and has continued to coordinate with local public agencies (including SANDAG, MTS, and the City) with regard to this proposed facility.

GSA also provides information on the status and schedule of LPOE improvements on their website at: http://www.gsa.gov/portal/category/21521.

The Draft SEIS was made publicly available on September 27, 2013 for a 45-day period. GSA extended the public comment period an additional 17 days, resulting in a total public comment period of 62 days. The public review period closed on November 29, 2013. The Notice of Availability for the SEIS was published in the Federal Register on September 27, 2014 and a notice of the extended public review period was published in the Federal Register on November 1, 2013.

A public meeting took place on November 14, 2013 in the San Ysidro community to discuss the Draft SEIS in an open house-style format. Each station had a table with information and one or more presentation boards with descriptive images related to the station topic. Each station included knowledgeable staff members to present information and answer questions related to their area of expertise. Spanish translators were available to assist as necessary. Individuals from the public were encouraged to sign in, receive information on the Revised Project, visit the topic-specific stations, and submit written comments.

Attendees included local residents and representatives of local businesses, government, and community groups.
5.5 LIST OF PUBLIC AGENCIES, PRIVATE ORGANIZATIONS, AND INDIVIDUALS THAT COMMENTED ON THE DRAFT SEIS

During the public comment period, a total of eight comment letters were received. Public agencies, organizations, businesses, and individuals that submitted comments on the Draft SEIS are listed below.

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<thead>
<tr>
<th>Letter Designation</th>
<th>Name</th>
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<tbody>
<tr>
<td><strong>Federal Agencies</strong></td>
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<tr>
<td>A</td>
<td>U.S. Environmental Protection Agency, Region IX</td>
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<tr>
<td>B</td>
<td>Federal Highway Administration</td>
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<tr>
<td>C</td>
<td>U.S. Department of Interior</td>
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<td><strong>State Agencies</strong></td>
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<td>D</td>
<td>California Department of Transportation</td>
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<tr>
<td><strong>Private Organizations and Individuals</strong></td>
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<td>E</td>
<td>San Ysidro Smart Border Coalition</td>
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<td>F</td>
<td>San Diego Archaeological Society</td>
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<td>G</td>
<td>Jennifer Goudeau</td>
</tr>
<tr>
<td>H</td>
<td>David Flores</td>
</tr>
</tbody>
</table>

Each of these was assigned a letter designation, as noted above. Each comment is designated by both the letter assigned to the comment letter, and the number assigned to the comment (e.g., A1, A2 and so on). Each letter is reprinted herein, along with a response.

The following pages provide the comment letter on the left side, with each specific comment bracketed and numbered in the left-hand margin, and correspondingly numbered responses to each comment on the right-hand side.

Where similar comments were received from multiple sources, or related comments were contained in the same letter, the reader may be referred to another applicable response. For comments that required modifications to correct or clarify information in the SEIS, that fact is so stated and the changes are identified by a line in the margin of the revised pages in this Final SEIS. In some cases, comments and responses provide additional information, which is now a part of the Final SEIS.
A1 Individual responses to the comments and recommendations presented in the attachment are provided below.

A1

United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105

Nov 26 2013

Osmah A. Kadri
US General Services Administration
Public Buildings Service
Portfolio Management Division 9P2PTC
450 Golden Gate Ave, 3rd Floor East
San Francisco, CA 94102

Subject: Supplemental Draft Environmental Impact Statement for San Ysidro Land Port of Entry Modernization and Expansion Project, San Diego County, California (CEQ #20130284)

Dear Mr. Kadri:

The U.S. Environmental Protection Agency (EPA) has reviewed the Supplemental Draft Environmental Impact Statement for the San Ysidro Land Port of Entry Modernization and Expansion Project pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

EPA commends the General Services Administration (GSA) for addressing many of our concerns expressed in previous comment letters on the Draft Environmental Impact Statement (7/2/2009) and Final Environmental Impact Statement (9/8/2009). The GSA has subsequently prepared a Supplemental (Draft) Environmental Impact Statement (SDEIS) for the San Ysidro Land Port of Entry (LPOE) that includes one no build and two build alternatives. Both build alternatives include a pedestrian crossing, and differ between six and ten southbound vehicular lanes.

After reviewing the supplemental document for the proposed Land Port of Entry project, we rated this SDEIS an LO, Lack of Objections, and included additional recommendations for consideration. Please see the attached Summary of EPA Rating Definitions for a description of our rating system. Our attached detailed comments provide recommendations to 1) better understand potential northbound air emissions, 2) coordinate protection of aquatic resources, 3) improve employee parking demand analysis, and 4) confirm green building certification.

We appreciate the opportunity to review the Supplemental Final Environmental Impact Statement. When the SFEIS is ready, please send one CD copy to the address above (specify Mail Code CED-2). If you have any questions, please contact Zac Appleton at 415-972-3321 or appleton.zac@epa.gov.

Sincerely,

Kathy Martyn Goforth, Manager
Environmental Review Office
cc: Shay Lynn Harrison, Caltrans District 11  
John Chisholm, Caltrans  
Rachel Kennedy, SANDAG  
Elisa Arias, SANDAG  
Jennifer Williamson, SANDAG  
Ron Senn, SANDAG  
Manuel Sanchez, Federal Highway Administration  
Brad Zerwas, U.S. Customs and Border Protection  

Enclosures:  Summary of EPA Rating Definitions  
EPA Detailed Comments
SUMMARY OF EPA RATING DEFINITIONS

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

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

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

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

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

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)
EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment*
### EPA DETAILED COMMENTS ON THE SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE SAN YSIDRO LAND PORT OF ENTRY PROJECT, NOVEMBER 26, 2013

**Northbound Air Emissions**
EPA acknowledges the extensive air conformity work GSA has completed for both forecasted southbound traffic and in CO hot spot analysis for vehicle traffic in both directions. However, the SDEIS does not analyze air emissions from northbound idling vehicles within the facility’s footprint which may present a significant localized pollution source, and could be subject to near-road air monitoring requirements pursuant to 40 CFR Part 58.

**Recommendation:**
EPA recommends GSA consider assessing emissions in the area of northbound vehicle lanes (in the facility’s footprint) and resulting impacts to human health. Such information may provide the basis for committing to future mitigation if future operations lead to increased air pollution.

**Aquatic Resources**
EPA recognizes that both Build Alternatives impact minimal aquatic resources, and that the SDEIS describes effective mitigation for those impacts. The proposed project will be located in the Tijuana River watershed, which has been the area for ongoing international environmental work through the Tijuana River Watershed Partnership. The current project provides an opportunity for further interagency coordination to facilitate continued environmental improvements for the region.

**Recommendation:**
EPA recommends GSA coordinate with EPA Region 9’s Wetlands Office to ensure mitigation for impacts to aquatic resources are effective and consistent with the larger Tijuana River Watershed Projects and Partnerships (http://www.epa.gov/region9/water/watershed/tijuana.html).

**Employee Parking Demand**
The SDEIS proposes 100 more employee vehicle parking spaces than were identified in the previously completed Draft and Final EISs for the proposed project. The additional parking reflects the expected demand from a third shift at the LPOE. Because providing additional parking spaces may induce more individual employee car trips, which may lead to increased air pollution, we recommend that GSA also consider the forecast demand for employee parking is accurate. We also note that Executive Order 13514 challenges federal facilities to “reduce the use of fossil fuels by optimizing the number of vehicles” among other methods.

**Recommendation:**
EPA recommends that GSA consider the environmental benefits of optimally sizing its employee parking structure. The SFEIS should clearly identify the peak employee parking demand, accounting for both incoming and outgoing employees during overlapping work shifts, and then use the result to optimally size the employee parking structure.

**The SFEIS should demonstrate how GSA is being consistent with the goals and objectives of Executive Order 13514.** For example, the SFEIS should describe measures GSA and the future Customs and Border Patrol occupants can take to reduce use of fossil fuels (carpool incentives, organized employee shuttles, etc.).

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**RESPONSES**

A2 Additional analysis of air emissions was conducted for the northbound traffic, as the traffic report for Revised Project was revised to incorporate northbound traffic trips into the analysis of the long-term (2035) scenario. The results of the additional analysis are contained in the revised Air Quality Technical Report and summarized in Section 4.6, *Air Quality and Greenhouse Gas Emissions*, of the Final SEIS.

A3 GSA will coordinate with applicable resource agencies during the design phase of the Revised Project regarding potential impacts to biological resources and appropriate avoidance, minimization, and mitigation measures.

A4 As discussed in Section 3.3.4 of the SEIS, the proposed employee parking structure under the Revised Project would include 100 more spaces than originally proposed with the Approved Project. The additional spaces were determined to be necessary to meet the future peak employee parking demand at buildout of the LPOE and thus, the parking structure has been sized accordingly.

A5 Executive Order 13514, Federal Leadership in Environmental, Energy, and Economic Performance, requires federal agencies to increase energy efficiency by reducing greenhouse gas emissions and designing, constructing, maintaining, and operating sustainable buildings. The Revised Project is consistent with the goals and objectives of this executive order in that recently constructed and proposed buildings within the LPOE include sustainable energy and water efficient features. In addition, the goal for the reconfigured LPOE is to achieve a minimum level of LEED® Gold certification for new buildings and where possible,
a Platinum certification level will be sought. Additionally, a number of incentives and educational efforts are currently in place to encourage LPOE employees to utilize alternative transportation to reduce vehicular emissions. Specifically, these include provision of transit subsidies (i.e., reimbursements to employees that commute via mass transit), organization of ride sharing programs, and posting of information materials regarding the benefits of alternative transportation. Federal agencies operating at the LPOE may also elect to provide additional incentives to promote the use of alternative transportation modes.

As discussed in Section 4.6, Air Quality and Greenhouse Gas Emissions, in the SEIS, the Action Alternatives would not result in adverse air quality or greenhouse gas emissions impacts and no mitigation is required. The goal for the reconfigured LPOE is to achieve a minimum level of LEED® Gold certification for new buildings and where possible, a Platinum certification level will be sought. Sustainable energy and water efficient features will be incorporated into the design and may include, but are not limited to, solar photovoltaic systems, solar thermal hot water system, geothermal heat exchange, ultra low-flow fixtures, rainwater reclamation system, and drought tolerant landscaping. It is anticipated that post-occupancy operational commitments will be implemented.
Hi Osmahn!

Thank you for the opportunity to comment. I just have one suggestion to offer:

1. Revised Project (S-1 and 2-1): the new NB pedestrian booth at "west side of LPOE," is this referring to Virginia Avenue? Please be more specific. Please let me know if you have any questions.

Best regards,

Manuel Enrique Sánchez, MPA
Senior Transportation Engineer/Border Engineer
Federal Highway Administration - California Division
United States Department of Transportation
Tel: 619.699.7336
Cell: 216.591.2483
manuel.sanchez@dot.gov
United States Department of the Interior  
OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Pacific Southwest Region  
333 Bush Street, Suite 515  
San Francisco, CA 94104

IN REPLY REFER TO:  
(ER 13/0651)  

Filed Electronically  

22 November 2013  

Mr. Osmahn Kadri  
NEPA Project Manager  
450 Golden Gate Avenue  
3rd Floor East  
San Francisco, CA 94102

Subject: Draft Supplemental Environmental Impact Statement (DSEIS) for the General Services Administration (GSA), San Ysidro Land Port of Entry (LPOE) Improvements, Modernization and Expansion Project, San Diego, CA.

Dear Mr. Kadri:

The Department of the Interior has received and reviewed the subject document and has no comments to offer.

Thank you for the opportunity to review this project.

Sincerely,

Patricia Sanderson Port  
Regional Environmental Officer

cc:  
Director, OEPC  
OEPC Staff Contact: Lisa Chetnik Treichel
The number of existing employees at the LPOE is a maximum of 230 per shift, with three shifts occurring during a 24-hour period. The number of employees upon buildout of the LPOE under the Revised Project is estimated at a maximum of 350 per shift (retaining three shifts per day), resulting in a net increase of 120 employees per shift. The analysis considers the net increase because existing trips associated with existing employees already occur on local roads and freeways and are captured in the existing traffic counts and factored into the future baselines (near-term and long-term). The traffic study assumed the projected net increase in employees was 155 per shift, which is greater than 120 and thus, provides a conservative analysis.

The methodology for the intersection analysis utilizes peak hour traffic volumes, pursuant to the *Highway Capacity Manual*. A total of 155 employee trips was used in the intersection analysis because that...
represents the additional employees trips that would occur during the peak hour. Because this number of peak hour trips is conservative (and is greater than the projected increase of 120 trips), no changes to the intersection analysis were made. The methodology for the roadway segment analysis, however, utilizes average daily traffic (ADT) volumes, which accounts for the average total daily trips (as opposed to peak hour trips) along the analyzed segment. The roadway segment analysis in the traffic study has been updated to reflect the total ADT generated by an increase of 155 employee trips, accounting for two trips per employee per shift (coming and leaving the LPOE) and three shifts per day. Whereas the traffic report previously used 320 ADT for the roadway segment analysis, it now uses 930 ADT (155 employee trips x 2 trips per employee x 3 shifts per day = 930 trips). This change did not result in new or more severe traffic impacts, as discussed in Section 4.2, Traffic and Transportation/Pedestrian and Bicycle Facilities, in the Final SEIS.

D2 The exhibits contained in the traffic study of the analyzed alternatives are preliminary concepts of the alternatives being considered. GSA will consider this design recommendation regarding medians during the design phase of the Revised Project.
D2 cont. The incident occurs on either side of the island vehicles will be able to move across to the other lanes to avoid conflict.

D3 The descriptions and exhibits in the revised traffic study of the two alternatives for the southbound roadway are consistent with the proposed roadway configurations of the southbound roadway. Under the Six-lane Alternative, the southbound roadway (south of the Camino de la Plaza overcrossing) would split into a 2+4 configuration and would then converge as an undivided six lane roadway before it divides into 19 lanes as it approaches the border. Under the Ten-lane Alternative, the roadway would split into a 3+3 configuration south of the overcrossing and would then converge as a ten-lane roadway until it divides into 19 lanes as it approaches the border. These proposed roadway configurations are shown in Figures 3-5 and 3-6 in the Final SEIS.

D4 Parking within the LPOE will be restricted to employees. Access to the proposed employee parking structure would be provided from Camiones Way via a gated access road that would extend within the LPOE, under the proposed southbound roadway, and parallel to the border. A small surface parking lot north of the proposed bi-directional pedestrian facility at the terminus of Virginia Avenue would also be accessible from Camiones Way and the gated access road. Refer to Figure 3-6 in the Final SEIS.

D5 The exhibits contained in the traffic study of the analyzed alternatives are preliminary concepts of the alternatives being considered. GSA will consider this design recommendation during the design phase of the Revised Project.

D6 The referenced “bulb-out” would function as a turnout for employee vehicles using the access road.

D7 Construction of a median along Camino de la Plaza is not proposed as part of the Revised Project and is not shown in Figures 2-1 and 2-2 in the traffic report or in Figures 3-5 and 3-6 in the SEIS. The traffic report identifies this as a potential improvement to be implemented by others to reduce traffic congestion along the segment of Camino de la Plaza between the I-5 southbound ramps and East San Ysidro Boulevard.
Construction of a raised median along this portion of the roadway would meet Four-lane Major roadway standards.

The intersection of Camino de la Plaza/I-5 southbound ramps/Camiones Way (intersection #12 in the traffic report) is forecast to operate at a level of service (LOS) F during the PM peak period under long-term (year 2035) conditions with or without either of the Action Alternatives (refer to Table 4.2-19 in the SEIS). As shown in that table, the delay at this intersection would decrease with the Action Alternatives. Therefore, no adverse impacts or improvements are identified for this intersection.

See response to comment D8.

See response to comment D5.

Figure 2-2 in the traffic report has been updated to reflect 10 lanes in the southbound roadway.

Traffic volume data is collected in 15-minute increments over the course of a two-hour period for the 7:00 AM – 9:00 AM and 4:00 PM – 6:00 PM hours. The “peak hour” within these time periods is determined by taking the highest total traffic volumes for all movements at an intersection for four 15-minute periods (i.e., [7:15 to 7:30] + [7:30- to 7:45] + [7:45 to 8:00] + [8:00 to 8:15]). The volumes shown in this comment are likely the highest volumes for traffic exiting or entering the freeway ramps over the course of one hour; however, they do not account for the peak time for traffic along the intersecting roadway (which may be different). For example, the off-ramp at Via de San Ysidro might peak between 8:00 AM and 9:00 AM, yet the peak for Via de San Ysidro is from 7:45 AM to 8:45 AM. The total peak hour volume ultimately used in the intersection analysis is the combination of both the I-5 off-ramp volumes and the Via de San Ysidro volumes, which provide the highest volumes for traffic at that intersection within the two-hour period.

The existing AM and PM peak hour and daily traffic volumes (which were collected in June 2010, March 2011, and April 2011) are provided in Appendix A1 of the traffic study.
D14 Section 3.3 of the traffic study has been revised to clarify ridership data of the trolley.

D15 The southbound on-ramp is served by a dedicated right-turn lane at the intersection of Camino de la Plaza/I-5 southbound ramps/Camiones Way that extends across the Camino de la Plaza overcrossing to approximately 300 feet west of the Camino de la Plaza/East San Ysidro Boulevard intersection. As discussed in response to comment D8, the Revised Project would not result in adverse impacts to the Camino de la Plaza/I 5 southbound ramps/Camiones Way intersection and thus, no improvements are required.

D16 Queue dissipation times are difficult to ascertain because they are dependent on a number of factors, including day of week, time of day, threat level, and other day-to-day information. Based on preliminary estimates and field observations at the San Onofre checkpoint, it is estimated that queues may dissipate between 5 and 30 minutes.

D17 The specifics on Mexican inspection times are not known and are not factored into the queuing analysis. As stated in Section 10.1 of the traffic study, when the U.S. is not conducting inspections, the bottleneck is anticipated to be on the Mexican side of the border. As discussed in Chapter 4 of the SEIS, potential impacts associated with operations at facilities in Mexico were addressed by Mexican agencies during the planning phases of Mexico’s’ El Chaparral LPOE and that cross-border impacts are generally not considered based on CEQ Guidance for Transboundary Impacts (July 1, 1997) and Executive Order 12114.

D18 Caltrans HDM Section 405.2(2)(e) provides a description of the methodology used to calculate the appropriate storage length at signalized and unsignalized intersections based on the total number of traffic volumes anticipated per cycle length or per two-minute period. It does not provide for freeway queuing significance criteria or queuing analysis methodologies.
<table>
<thead>
<tr>
<th>COMMENTS</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>D19</strong> The criteria used to choose the Preferred Alternative were based on which alternative would best satisfy the purpose and need of the Revised Project, as well as the availability of funding to construct the proposed improvements. As discussed in Section 3.5 in the Final SEIS, after careful consideration of the environmental analysis and associated environmental effects of the action alternatives and No Action Alternative, the needs of federal agencies operating at the San Ysidro LPOE, and comments received on the Draft SEIS, GSA identified the Ten-lane Alternative as the Preferred Alternative. The Ten-lane Alternative would best satisfy the purpose and need of the Revised Project, and would result in greater benefits to operational efficiency at the LPOE, cross border circulation, and mobility within the Revised Project area compared to the Six lane Alternative.</td>
<td></td>
</tr>
<tr>
<td><strong>D20</strong> Intersection 12 has been renamed accordingly throughout the traffic report and the SEIS.</td>
<td></td>
</tr>
<tr>
<td><strong>D21</strong> The 70/30 percentage split for the east and west pedestrian facilities was derived from the number of primary pedestrian inspection lanes anticipated to be provided at each pedestrian crossing facility. The eastern facility was assumed to include 16 primary lanes, and the western facility was assumed to include six primary lanes, resulting in an approximately percentage split of 70/30, respectively. The use of the percentage split was also derived through discussions with U.S. Customs and Border Protection.</td>
<td></td>
</tr>
<tr>
<td><strong>D22</strong> The 22/78 percentage mode split used in the analysis is based on survey data from pedestrians crossing the border (both inbound and outbound). This pedestrian survey was conducted in 2009 as part of the <em>San Ysidro Land Port of Entry (LPOE) Expansion Project Mobility Study</em>, which is incorporated by reference in the SEIS (refer to Section 1.3.2). Additionally, the mode split is based on projections of public transportation availability on the west side of the LPOE.</td>
<td></td>
</tr>
<tr>
<td><strong>D23</strong> Similar to the reasons discussed in response to comment D1, the analysis considers the net increase in pedestrian trips because existing trips associated with existing pedestrians already occur on local roads and freeways and are captured in the existing traffic counts and factored into the future baselines (near-term and long-term).</td>
<td></td>
</tr>
<tr>
<td><strong>D24</strong> Section 7.1.3 of the traffic study has been revised to define VOR.</td>
<td></td>
</tr>
</tbody>
</table>
D25 See response to comment D21.

D26 Existing and forecasted traffic volumes are provided both in the body of the traffic report (shown in tables and figures) and in the appendices.

D27 See response to comment D21.

D28 Under near-term conditions, no adverse traffic impacts would occur to the intersection of Camino de la Plaza/Virginia Avenue as a result of the Revised Project (refer to Table 4.2-11 in the SEIS). This intersection would, however, be adversely impacted under long-term conditions (year 2035) with the Revised Project (refer to Table 4.2-19 in the SEIS), which is why it is discussed in the Summary (and elsewhere in the traffic report) as a cumulative impact. Section 8.1.1 of the traffic report explains that the approved Outlets at the Border project is conditioned to install a traffic signal at the Camino de la Plaza/Virginia Avenue intersection. Since traffic from the approved Outlets at the Border project was included in the near-term traffic volumes, it is appropriate to assume the improvements required of this other project would be constructed under near-term conditions. If, for some reason, the Revised Project is constructed before the Outlets at the Border project, the traffic signal would be installed as part of the Revised Project.

D29 As identified in Sections 9.2.2 and 9.4.2 in the traffic report and in Tables 4.2-10 and 4.2-18 in the SEIS, the roadway segment of Camino de la Plaza between Virginia Avenue and the I-5 southbound ramps would be adversely impacted under near-term and long-term conditions with the Revised Project. As noted, the Outlets at the Border project is conditioned to improve this roadway segment to its ultimate classification as a Four-lane Collector by adding a second westbound through lane along this portion of the roadway. If the approved Outlets at the Border project proceeds with implementation of this roadway improvement prior to implementation of the Revised Project, this would reduce adverse impacts to this roadway segment that would occur under near-term and long-term conditions as a result of the Revised Project. If, for some reason, the Revised Project is constructed before the Outlets at the Border project, impacts to this roadway segment would remain adverse until the time that the additional lane is constructed by the Outlets at the Border project.
<table>
<thead>
<tr>
<th>COMMENTS</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>D30</td>
<td>No changes to the traffic volumes on Figure 8-1 are required. Refer to response to comment D12.</td>
</tr>
<tr>
<td>D31</td>
<td>The volumes arriving at intersection 12 total 410, not 268. All turning movements at intersection 12 must be accounted for, not just the westbound through volume. Thus, a difference of only 3 trips exist between intersections 12 and 13.</td>
</tr>
<tr>
<td>D32</td>
<td>It is recognized that the current configuration of the southbound roadway is temporary until the proposed southbound roadway is constructed. As discussed in Section 3.2.2 of the SEIS, the temporary southbound roadway was constructed as an interim connection between I-5 and the new El Chaparral LPOE in Mexico. The interim southbound roadway reflects the existing condition of the roadway network and thus, is appropriately used as the baseline for the traffic analysis.</td>
</tr>
<tr>
<td>D33</td>
<td>Specific roadway improvements used in the long-term analysis (year 2035) are identified in Section 8.2.1 of the traffic report. With regard to Camino de la Plaza, the long-term analysis assumes this roadway (between Virginia Avenue and East San Ysidro Boulevard) would be improved to its ultimate classification as a Four-lane Collector. Thus, the traffic report assumes that the roadway segment would be widened under long-term (2035) conditions.</td>
</tr>
</tbody>
</table>
D34 The off-ramp that intersects with the Camiones Way/I-5 ramps/Camino de la Plaza intersection is proposed as a gated exit restricted to federal agency use. The traffic study assumed that an estimated 30 vehicles would use this ramp during the AM and PM peak periods. Section 8.3 of the traffic study has been revised to clarify the use of this ramp.

D35 Figures 8.2 and 8.4 have been revised to remove the connection between intersections 12 and 13.

D36 As discussed in response to comment D8, no adverse impacts to the intersection of Camino de la Plaza/I-5 southbound ramps/Camiones Way (intersection #12 in the traffic report) would occur as a result of the Revised Project and therefore, no improvements are identified for this intersection.

The Camino de la Plaza/Virginia Avenue intersection (intersection #13 in the traffic report) would be adversely impacted by the Revised Project under long-term conditions. As discussed in response to comment D28, installation of a traffic signal at this intersection is a condition of the Outlets at the Border project and if the Revised Project is constructed prior to the Outlets at the Border project, then the traffic signal would be installed as a part of the Revised Project. Other potential improvements to reduce impacts at this intersection are identified in Section 11.0 of the traffic study and in Section 4.2.4 of the SEIS.

D37 The data in Table 9-1 of the traffic study are consistent with the near-term peak hour intersection analysis worksheets contained in Appendix G of the traffic study.

D38 Refer to response to comment D29 regarding the roadway segment of Camino de la Plaza between Virginia Avenue and the I-5 southbound ramps.

D39 The note about bottlenecking and inspections is intended to provide background information regarding the “pulse and surge” inspections conducted by CBP as it relates to existing and proposed capacity of the analyzed alternatives. Estimated vehicle queues associated with the No
D39  Action, Six-lane, and Ten-lane alternatives are summarized in Table 10-5 and Figures 10-1 and 10-2 of the traffic report, as well as in Section 4.2.3 in the SEIS. Refer to response to comment D17 regarding Mexican inspections.

D40  According to Section 405.2(2)(e) of the Highway Design Manual, "At a minimum, space for 2 vehicles should be provided at 25 feet per vehicle" for determining the amount of storage length needed at an intersection. Accordingly, 25 feet was used in the queuing analysis.

D41  The capacity included in the queue analysis accounts for the inspection time needed to process each vehicle. The demand shows the highest amount of traffic during the peak hours of the day (AM and PM). It would be assumed that the excess demand for vehicles that were not processed during the peak hour would carry over into the following hour. However, the peak periods shown in the queuing analysis represent the hours of the day with the highest amount of border crossing traffic. The demand in the hour following the AM or PM peak period would likely be less than that of the peak hour. Therefore, although the excess demand would fall into the timeframe following the peak hour, the queuing results show the theoretical queue that would result from the influx of border traffic during the peak period. This queuing methodology is consistent with on ramp meter queuing analysis per SANTEC/ITE. During time of heavy queuing, inspection times would be reduced and vehicles would be waved through at a faster rate. This practice can be observed at the San Onofre checkpoint.

D42  The freeway volumes identified in Figures 8-1 through 8-4 in the traffic report and Figures 4.2-4 and 4.2-7 in the SEIS have been revised.

D43  As shown in Table 10-2 in the traffic study and Table 4.2-12 in the SEIS, no queues are identified under near-term (2016) conditions with the Six-lane Alternative because the demand does not exceed the capacity.

D44  As shown in Table 10-3 in the traffic study and Table 4.2-12 in the SEIS, the demand under year 2016 conditions with the Ten-lane Alternative is 4,812 vehicles compared to 4,258 vehicles in 2016 without the Ten-lane Alternative, which results in a change in demand of 554 vehicles and a reduction in queue length of 1.18 miles, as noted in Section 10.2.2 of the traffic report. The capacity for existing, near-term, and year 2035 remains the same under each alternative, but the volumes increase from existing to 2016 to 2035.
As discussed in response to comment D44, traffic volumes increase from existing to 2016 to 2035. The freeway queuing analysis conducted for the year 2035 represents a cumulative peak hour queuing analysis.

Figure 8-2 in the traffic report has been revised to show the correct near-term demand volumes.

The exhibits contained in the traffic study of the analyzed alternatives are preliminary concepts of the alternatives being considered. The queue analysis for the Ten-lane Alternative assumed the southbound roadway would include ten lanes between the Camino de la Plaza overcrossing and the border, using a distance of 0.2 mile. A reduction to this distance would result in negligible changes to the queuing analysis.

Freeway off-ramps within the traffic study area include I-5/Via de San Ysidro, I-805/East San Ysidro Boulevard, I-5/East San Ysidro Boulevard, and I-5/Camino de la Plaza. None of these freeway off-ramps would be adversely impacted by the Revised Project under near-term or long-term conditions (see Tables 9-1 and 9-3 in the traffic report and Tables 4.2-11 and 4.2-19 in the SEIS). See response to comment D8 regarding impacts and improvements to the Camino de la Plaza/I-5 southbound ramps/Camiones Way intersection.

The traffic report and SEIS considers traffic impacts and identifies measures that would help avoid, minimize, or mitigate such impacts. NEPA requires the decision-maker to consider the impacts of a proposed action, but does not require the agency to adopt such measures. GSA will consider adopting and implementing measures that are determined to be feasible and consistent with existing laws, regulations, and authorities applicable to GSA, particularly with regard to the availability of, and authority to expend, funds. Authorized funds may not be available to implement the identified potential improvements and avoidance, minimization, and mitigation measures. Measures adopted by the agency will be identified in the Revised Project Record of Decision. Accordingly, Section 11.0 of the traffic study has been revised to clarify that the identified potential improvements are not proposed as part of the Revised Project.
<table>
<thead>
<tr>
<th>COMMENTS</th>
<th>RESPONSES</th>
</tr>
</thead>
<tbody>
<tr>
<td>D50 Appendix A was reviewed for accuracy and it is acknowledged that although three of the pedestrian count sheets (Camino de la Plaza/Virginia Avenue pedestrians) inadvertently have incorrect titles in the tables and diagrams, the data presented in the counts sheets are accurate. These typos do not change the results and conclusions of the traffic report.</td>
<td></td>
</tr>
<tr>
<td>D51 The information included on page 95 of Appendix A2 was intended to show Equation 6-1 and Table 6-3 as background data used in the traffic report and is an excerpt from another report. The last section on that Appendix page and subsequent pages of the source report are not relevant to the data shown. Nevertheless, page 96 of the source report has been added to Appendix A2.</td>
<td></td>
</tr>
<tr>
<td>D52 The rerouted volumes shown in Appendix E are included in the near-term and long-term traffic volumes with the addition of Revised Project traffic. There is no figure in the traffic study that explicitly depicts these volumes.</td>
<td></td>
</tr>
</tbody>
</table>
Since the near-term and Year 2035 pedestrians represent the total number of people crossing the border under these scenarios, the number of existing pedestrians currently on the street system today would need to be discounted from the expected amount in the future to represent the net increase in pedestrians under each scenario. The impacts to the local street system were based on the vehicular trips that would be anticipated to be generated by these net new pedestrians.

Table 7-2 illustrates the Virginia Avenue pedestrian volumes.

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Inbound AM/PM Peak Hour Volumes</th>
<th>Outbound AM/PM Peak Hour Volumes</th>
<th>Total AM/PM Peak Hour Volumes</th>
<th>Daily Pedestrians</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing</td>
<td>930/320</td>
<td>190/860</td>
<td>1,120/1,180</td>
<td>16,200</td>
</tr>
<tr>
<td>Near-Term (Year 2016)</td>
<td>1,160/480</td>
<td>120/1,070</td>
<td>1,280/1,470</td>
<td>20,300</td>
</tr>
<tr>
<td>Net New Pedestrians (Year 2016)</td>
<td>230/90</td>
<td>26/210</td>
<td>256/290</td>
<td>4,190</td>
</tr>
<tr>
<td>Year 2035</td>
<td>1,750/610</td>
<td>190/1,610</td>
<td>1,940/2,220</td>
<td>30,600</td>
</tr>
<tr>
<td>Net New Pedestrians (Year 2035)</td>
<td>820/290</td>
<td>90/750</td>
<td>910/7,040</td>
<td>14,380</td>
</tr>
</tbody>
</table>

General Notes:
1. Inbound = Entering the U.S. from Mexico
2. Outbound = Departing the U.S. into Mexico
<table>
<thead>
<tr>
<th>Mode of Travel</th>
<th>% of Pedestrians</th>
<th>Near-Term (Year 2016)</th>
<th></th>
<th>Long-Term (Year 2035)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>AM</td>
<td>PM</td>
<td>AM</td>
<td>PM</td>
</tr>
<tr>
<td>Net New Pedestrians *</td>
<td>100%</td>
<td>230</td>
<td>20</td>
<td>80</td>
<td>210</td>
</tr>
<tr>
<td>Public Transit</td>
<td>78%</td>
<td>179</td>
<td>16</td>
<td>62</td>
<td>164</td>
</tr>
<tr>
<td>Privately Occupied Vehicle (POV)</td>
<td>22%</td>
<td>51</td>
<td>4</td>
<td>18</td>
<td>46</td>
</tr>
<tr>
<td>Privately Occupied Vehicle (POV)Pedestrians</td>
<td>100%</td>
<td>51</td>
<td>4</td>
<td>18</td>
<td>46</td>
</tr>
<tr>
<td>A. Pick-Up/Drop-Off</td>
<td>67%</td>
<td>34</td>
<td>3</td>
<td>12</td>
<td>31</td>
</tr>
<tr>
<td>VOR 2.5 (33% of Pick-Up/Drop-Off)</td>
<td>4</td>
<td>0</td>
<td>2</td>
<td>4</td>
<td>16</td>
</tr>
<tr>
<td>VOR 1.0 (67% of Pick-Up/Drop-Off)</td>
<td>23</td>
<td>2</td>
<td>8</td>
<td>21</td>
<td>81</td>
</tr>
<tr>
<td>Subtotal Pick-Up/Drop-Off (two trip-ends)</td>
<td>54</td>
<td>4</td>
<td>20</td>
<td>50</td>
<td>194</td>
</tr>
<tr>
<td>B. Parked</td>
<td>33%</td>
<td>17</td>
<td>1</td>
<td>6</td>
<td>15</td>
</tr>
<tr>
<td>Total Vehicular Trips (A + B) (Parked &amp; Pick-Up/Drop-Off)</td>
<td>71</td>
<td>5</td>
<td>26</td>
<td>65</td>
<td>253</td>
</tr>
</tbody>
</table>

Footnotes:

a. Net new pedestrians provided in Table 7-2.

b. VOR used in a division of total pick-up/drop-off trips. For example: 33% of pick-up/drop-off trips consist of 2.5 persons per vehicle. Thus, 33% of 34 AM inbound trips is 11.

c. 11 = 2.5 persons per vehicle = 4 AM inbound trips.

c. For every pick-up/drop-off pedestrian there is an inbound and outbound vehicular trip and vice versa. Thus, two trip-ends were calculated in each peak period for each inbound and outbound pedestrian.

General Notes:

1. VOR = Vehicle occupancy ratio.
COMMENTS

November 14, 2013

General Services Administration
Attention: Osmahn Kadri
NEPA Project Manager
450 Golden Gate Ave, 3rd Floor East
San Francisco, CA 94102

RE: COMMENTS on San Ysidro Land Port of Entry (LPOE) Improvements Project Draft Supplemental Environmental Impact Statement (SEIS)

Mr. Kadri:

The SAN YSIDRO SMART BORDER COALITION, est. 2007, will be submitting a formal letter of our comments in this regard, but in the meantime and for the sake of the Public Hearing to be held this evening, we submit the following brief:

- It is impossible to make appropriate comments on the Draft Supplemental, when it is not publicly available. The Draft Supplemental, as of 1:30pm PST on the date of the hearing, November 14, 2013, is not present on the GSA website, nor in the NEPA library. Attached are screen shots of the listing of documents available, and they do not include the Draft Supplemental.

- We are in favor of, and continue to support, the north- and south-bound pedestrian crossing at Virginia Ave. In fact, it was the SAN YSIDRO SMART BORDER COALITION, est. 2007, that led the push for this crossing to be taken out of Phase III and built ASAP. We have also attached a letter we previously sent asking for the integration of bicycle crossing at Virginia Ave. to be made part of our comment in this Supplemental EIS.

- In regards to the changes to southbound vehicular changes (the remaining part of Phase III) the SAN YSIDRO SMART BORDER COALITION, est. 2007, wholeheartedly supports “NO ACTION.”

- Deviation from the Congressionally-approved San Ysidro LPOE EIS of 2009 will cause:
  - Loss of private property and loss of tax-generating business
  - Loss of community-driven development and re-development at POR surrounding areas
  - Loss of available land for project impact mitigation
  - Loss of 56% of available public parking in the immediate border area (1256 spaces)
  - Lack of viable relocation options for affected businesses

These issues had the ability to be settled with the 2009 design, but cannot be settled with either of the two proposed changes. Again, we vehemently support NO ACTION to Phase III lane changes.

RESPONSES

E1 It is acknowledged that the Draft SEIS was not initially posted on the GSA website. However, the document has since been uploaded to the GSA website (www.gsa.gov/nepalibrary). Regardless, a Notice of Availability (NOA) and CD of the Draft SEIS was mailed to the San Ysidro Chamber of Commerce and Business Association at the same address as the Smart Border Coalition at the time the document was released in September 2013. The NOA provided GSA contact information regarding the availability of the Draft SEIS. The document was also available at the San Ysidro Library.

E2 The comment supporting the proposed modification of the bi-directional pedestrian crossing facility at Virginia Avenue and timing of construction is noted. Refer to response to comment E8 regarding bicycle crossing at the proposed bi-directional crossing facility at Virginia Avenue.

E3 Comment noted. No response necessary.

E4 As discussed in Section 4.1.5 in the SEIS, no additional property acquisitions or business relocations would occur with the Revised Project. The Action Alternatives of the Revised Project include only those parcels whose acquisition was analyzed for the Approved Project in the Final EIS. Additionally, as discussed in Section 4.1.4 in the SEIS, the Revised Project Action Alternatives would not result in additional displacement of public parking beyond what was identified and analyzed as part of the Approved Project in the Final EIS.
San Ysidro is currently suffering from sporadic US southbound interdictions, causing back-ups on I-5, I-805, San Ysidro Blvd., Beyer Blvd. and Camino de la Plaza up to Two Miles Long! Permanent southbound inspection booths will exacerbate the problem – for operations that have never been reported or publicly quantified as to their results. This DEIS cannot come close to measuring the environmental impact either option presented will hold. Here is a quote from a businessman whose family has been in business in San Ysidro for over 60 years, “This an unfortunate disregard for the San Ysidro community. All my employees and those adjoining business were getting off work, tired & knowing that they had to go sit in south bound line for an hour or two. I hate to say it but I’m pretty sure that if every CBP officer had to add 2 hours to his or her commute home, it wouldn’t take long for this to stop. This has been happening more frequently & completely effecting San Ysidro.” Again, we vehemently support NO ACTION to Phase III lane changes.

San Ysidro is a community documented at all three levels of government to be stricken by vehicular-exhaust-causing health issues due to the inefficiency of the northbound vehicular crossings at the San Ysidro LPOE. Both proposed changes to southbound vehicular lanes will further this negative public and environmental impact. All this – with an elementary school adjacent to the SYPOE southbound lanes.

The San Ysidro LPOE Improvements Project and GSA must continue their great work on the Virginia Ave Pedestrian Crossing and accept “NO ACTION” on the proposed changes to the 2009 congressionally-approved, environmentally-studied and planned design for Phase III in the subject Draft Supplemental EIS.

Sincerely,

Jason M-B Wells
Coordinator

Cc: CalTrans
SANDAG
San Diego County Chairman Greg Cox
San Diego Mayor Gloria
Councilmember Alvarez

E5 The SEIS and supporting technical studies analyze impacts assuming the continuation of CBP’s existing “pulse and surge” southbound inspections. The current CBP protocol for southbound inspections is to periodically conduct southbound inspections for a maximum duration of 30 minutes per inspection event. Section 4.2.3 in the SEIS contains a southbound freeway queuing analysis for both of the Action Alternatives (i.e., Six-lane and Ten-lane) that includes construction of southbound inspection booths within the proposed southbound roadway. Projected vehicle queue lengths under the Action Alternatives for near-term (2016) and long-term (2035) conditions are illustrated in Figures 4.2-5 and 4.2-8. As shown and discussed in the SEIS, no freeway queues would occur in the AM or PM peak hour for the Six-lane or Ten-lane Alternative under near-term conditions. Under long-term conditions, no freeway queues would occur in the AM peak hour for either Action Alternative. During the long-term PM peak hour, no queues would occur under the Ten-lane Alternative, and although a queue would occur during the PM peak hour with the Six-lane Alternative it would be reduced compared to the Baseline condition (i.e., the existing temporary southbound roadway). Therefore, with the additional capacity provided by the Revised Project, freeway queues would be reduced with implementation of either the Six-lane or Ten-lane Alternative.

E6 As described in Section 4.6, Air Quality and Greenhouse Gas Emissions, in the Final SEIS, a mobile source air toxics (MSAT) analysis was conducted to determine potential MSAT impacts at educational facilities within the vicinity of the I-5 and I-805 freeways and the Revised Project Footprint, including Willow Elementary School, Beyer Elementary School, San Ysidro Middle School, and La Mirada Elementary School. Both the Six-lane Alternative and Ten-lane Alternative would result in reduced levels of analyzed MSATs compared to the Baseline condition (refer to Tables 4.6-11, 4.6-12, 4.6-21, and 4.6-22 in the Final SEIS) because the increased capacity with the proposed southbound roadway would help reduce southbound vehicle queue lengths and idling on freeway segments adjacent to the schools. Therefore, no adverse impacts associated with MSAT emissions would occur at Willow Elementary School, Beyer Elementary School, San Ysidro Middle School, and La Mirada Elementary School.
June 5, 2013

U.S. General Services Administration
Public Building Services
Attn: Osmahn Kadri
Portfolio Management Division, 9PTC
450 Golden Gate, 3rd Floor East
San Francisco, CA 94102
Sent via osmahn.kadri@gsa.gov

Re: Comments on Supplemental Environmental Impact Statement for the San Ysidro Land Port of Entry (POE) Reconfiguration Project - BICYCLE CROSSING

Dear Mr. Kadri:

On behalf of the non-profit community serving San Ysidro, I wish to comment on the Supplemental Environmental Impact Statement for the San Ysidro Land Port of Entry (POE) Reconfiguration Project by urging that serious consideration be given in support of introducing bicycle-crossing to the Virginia Avenue Crossing.

San Ysidro experiences the highest incidents of diabetes and respiratory illness in the state due to the elevated air concentrations of ultrafine and fine particles, highly associated with the local infrastructure’s carbon footprint. This has resulted in the community’s increased desire to improve lifestyle choices and behaviors by changing San Ysidro’s environment to promote walking and bicycling. We are working with the City of San Diego and County of San Diego to construct a Class 1 bicycle trail from Imperial Beach all the way to Virginia Ave. An actual bicycle crossing at Virginia Ave would allow our region to tap into the ever-growing bicycling populous in Tijuana (they have even conditioned some of their rivers as bike paths) and allow GSA to be the architects of a monumental life-style, health and environmental changing project!

Mr. Kadri, we have enjoyed working with GSA as you try to make the SYLPOE a LEED certified Port of the Future. A bicycle crossing at Virginia Ave. is one of the most important ways at your disposition to make this a reality. We trust that GSA will not let this opportunity pass us by.

Sincerely,

Jason M-B Wells
Coordinator

---

E7 Comment noted. No response necessary.

E8 Bicycles will be processed as pedestrians. Provision of a separate bicycle processing facility presents operational issues. Dedicated northbound bicycle inspections were previously provided at the LPOE for a time, but were discontinued because ad hoc rentals of dilapidated bicycles would occur so that northbound pedestrians could bypass the longer pedestrian inspection line and utilize the shorter bicycle line. Upon crossing the border, the bicycles would be abandoned at the LPOE, causing safety and security issues.
San Diego County Archaeological Society, Inc.
Environmental Review Committee
13 September 2013

To: Mr. Osmah Kadri, NEPA Project Manager
   450 Golden Gate Avenue, 3rd Floor East
   San Francisco, California 94102

Subject: Draft Supplemental Environmental Impact Statement
   San Ysidro Land Port of Entry Improvements Project

Dear Mr. Kadri:

I have reviewed cultural resources aspects of the subject DSEIS on behalf of this committee of
the San Diego County Archaeological Society.

Based on the information contained in the DEIS and its cultural resources reports, we concur
with the impact analysis and mitigation recommendations. We would, however, suggest that the
modifications to the Old Customs House be made, to the extent possible, to be reversible.

Thank you for the opportunity to participate in the public review period for this DSEIS.

Sincerely,

[Signature]

James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: ASM Affiliates
    SDCAS President
    File

F1 Comment noted. During the design phase of the Revised Project, the feasibility of making modifications to the Old Customs House reversible will be considered.
G1 Refer to response to comment E5.

G2 Comment noted. The proposed modification to incorporate a bi-directional pedestrian crossing facility at Virginia Avenue would improve mobility within and around the LPOE by providing additional pedestrian and bicycle access and connectivity between the two sides of community that is divided by the freeway.

G3 As discussed in Section 3.5 in the Final SEIS, after careful consideration of the environmental analysis and associated environmental effects of the action alternatives and No Action Alternative, the needs of federal agencies operating at the San Ysidro LPOE, and comments received on the Draft SEIS, GSA identified the Ten-lane Alternative as the Preferred Alternative.
San Ysidro Land Port of Entry Improvements Project
Proyecto de Mejoras de la Garita de San Ysidro

Comments on the
Draft Supplemental Environmental Impact Statement
Comentarios sobre el Borrador del Informe Suplementario de Impacto Ambiental

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H1 Comment noted. No response necessary.

H2 Refer to response to comment E5 regarding vehicle queue due to southbound inspections and response to comment E6 regarding associated air emissions.

H3 As discussed in Chapter 4 in the SEIS (page 4.1-1), no adverse noise impacts would occur as a result of the Revised Project. The Revised Project Footprint is located in a developed urban area mostly comprised of commercial uses. No noise-sensitive receptors are located within or adjacent to the San Ysidro LPOE. The closest residential neighborhood is approximately 0.3 mile to the northwest.
CHAPTER 6

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CHAPTER 6 – LIST OF PREPARERS

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### CHAPTER 7 – DISTRIBUTION LIST

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Ninyo & Moore

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Southwest Consortium for Environmental Research and Policy


University of San Diego Burnham-Moores Center for Real Estate

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U.S. Department of Homeland Security, Customs and Border Protection

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2013a San Ysidro LPOE Fact Sheet http://www.gsa.gov/portal/mediald/178695/fileName/FactSheet-July_2013

2013b Otay Mesa LPOE Fact Sheet http://www.gsa.gov/portal/mediald/173351/fileName/Otay_Mesa_LPOE_Project_Fact_Sheet_-_Jun2013


2009b Record of Decision San Ysidro Land Port of Entry Improvements Project. September.
APPENDIX A

SUMMARY OF AVOIDANCE, MINIMIZATION, AND/OR MITIGATION MEASURES
SUMMARY OF AVOIDANCE, MINIMIZATION, AND/OR MITIGATION MEASURES

Utilities/Emergency Services/Life Safety

Six-lane Alternative, Ten-lane Alternative, and No Action Alternative

Utilities

Implementation of the following measure would avoid or reduce potential impacts related to utilities:

- The construction contractor should coordinate with responsible utility providers to protect systems in place or arrange for the temporary or permanent relocation of existing utility lines.

Emergency Services

Implementation of the following measures would avoid or reduce potential impacts related to emergency services during construction:

- A Traffic Management Plan (TMP) should be implemented to provide for emergency access on roadways that would be temporarily affected during the construction period.

- The construction contractor should contact local emergency service providers prior to the start of construction to ensure construction activities would not impede provision of emergency services within the Project area during the construction period.

Life Safety

The following protective design measures should be incorporated to ensure the safety of people at the San Ysidro LPOE:

- Bollards and barriers should be used to protect structural elements from vehicle damage. Anti-ram barriers must be provided wherever moving vehicles approach booths or buildings.

- Exterior walls and interior walls in high-risk areas, such as lobbies and public screening spaces, should be reinforced with cast-in-place or precast reinforced concrete.

- Exterior windows and interior windows between high-risk areas and occupied space should be thermally tempered or laminated glass.

- Bullet resistant glazing should be provided on windows that face inspection areas, on-coming traffic, or the border.

- Building perimeters and doors between inspection areas should be designed to resist forced entry.

- Utilities critical to LPOE operations should be located within the Central Plant building, which would be structurally reinforced.

- Where utilities are located within occupied buildings they should be separated from inspection and public lobby areas by at least 25 feet or by reinforced walls and floors.
Appendix A

Summary of Avoidance, Minimization, and/or Mitigation Measures

- Air intakes should be secured.
- Mechanical equipment should not be placed at grade and directly adjacent to vehicle movement pathways.
- Utilities and feeders should not be located adjacent to vehicle pathways, or on the Mexican side of the primary inspection lanes.

Traffic and Transportation/Pedestrian and Bicycle Facilities

Six-lane Alternative and Ten-lane Alternative

A primary goal in support of the Revised Project purpose is to increase the processing capacity and efficiency of the LPOE in response to the need that is created by the current and projected demand for vehicles and persons to cross the border. Thus, the Action Alternatives (Six-lane and Ten-lane Alternatives) would not directly generate a substantial volume of traffic, but would accommodate existing and projected border crossing demand. They would also modify the patterns of traffic flow in the Revised Project area. The purpose and need for the Revised Project does not include local roadway improvements; however, the SEIS considers all traffic impacts and identifies measures that would help avoid, minimize, or mitigate such impacts, as outlined below.

Near-term Conditions

Implementation of the following measure would avoid or reduce traffic impacts resulting from the Action Alternatives for near-term conditions:

- Widening the segment of Camino de la Plaza, between Virginia Avenue and the I-5 southbound ramps to Four-lane Collector standards.

Long-term Conditions

In addition to the measure listed above under near-term conditions, implementation of the following measures would avoid or reduce traffic impacts to roadway segments and intersections resulting from the Action Alternatives for long-term conditions:

- Widening the segment of Camino de la Plaza, between the I-5 southbound ramps and East San Ysidro Boulevard, to Four-lane Major standards.
- Widening of Camino de la Plaza to provide an additional dedicated right-turn lane onto East San Ysidro Boulevard.
- Installation of a traffic signal at the Camino de la Plaza/Virginia Avenue intersection.
- Re-striping of the northbound approach of the Camino de la Plaza/Virginia Avenue intersection to provide one shared left-turn/through lane and a dedicated right-turn lane, and widening the southbound approach to provide one exclusive left-turn lane and a shared through/right-turn lane.

No Action Alternative

A primary Project goal in support of the Project purpose is to increase the processing capacity and efficiency of the LPOE in response to the need that is created by the current and projected
demand for vehicles and persons to cross the border. Thus, the No Action Alternative does not directly generate a substantial volume of traffic, but would accommodate existing and projected border crossing demand. It would also modify the patterns of traffic flow in the Project area. The purpose and need for the Approved Project does not include local roadway improvements; however, feasible improvements have been identified that may be implemented by others to achieve acceptable LOS, based on commonly accepted local roadway segment and intersection standards. These potential improvements to be implemented by others are described below.

Near-term Conditions

Implementation of the following measure would avoid or reduce traffic impacts resulting from the No Action Alternative for near-term conditions:

- Widening the segment of Camino de la Plaza, between Virginia Avenue and the I-5 southbound ramps, to Four-lane Major standards.
- Installation of a traffic signal at the Camino de la Plaza/Virginia Avenue intersection.

Long-term Conditions

In addition to the measure listed above under near-term conditions, implementation of the following measures would avoid or reduce traffic impacts to roadway segments and intersections resulting from the No Action Alternative for long-term conditions:

- Re-striping of the I-5 southbound ramps at Camino de la Plaza to one southbound left-turn lane, one southbound right-turn lane, one southbound shared through/right-turn lane, and one westbound through lane.

Visual/Aesthetics

Six-lane Alternative, Ten-lane Alternative, and No Action Alternative

Although no adverse visual impacts would occur, implementation of the following minimization measures would provide increased visual quality within the LPOE:

- A comprehensive landscape concept plan should be developed and implemented, including landscape features such as:
  - Drought tolerant and sustainable plant palettes.
  - Vine planting at fences and walls to reduce the visual scale and to act as a graffiti deterrent.
- Street trees and landscaping should be retained to the highest extent possible during construction.
- Architectural treatments should be consistent throughout the proposed LPOE buildings.
- Metal fencing and safety railing should be consistent throughout the proposed pedestrian walkways.
- Where possible, integrate new public art consistent with the international border setting.
**Cultural Resources**

**Six-lane Alternative and Ten-lane Alternative**

**Archaeological Resources**

Implementation of the following avoidance, minimization, and mitigation measure would avoid adverse impacts to unknown subsurface archaeological resources:

- If cultural materials are discovered during construction, all earth-moving activity within and around the immediate discovery area should be avoided until a qualified archaeologist can assess the nature and significance of the find.

**Historical Resources**

The following measures would avoid, minimize, or mitigate direct adverse impacts to historical resources during renovation of the Old Customs House:

- All renovation of the Old Customs House should conform to *The Secretary of the Interior’s Standards for the Treatment of Historic Properties*.
- Prior to alteration or removal of building features, detailed documentation of the Old Customs House should be completed as agreed to in the Section 106 consultation process.

If all adverse effects cannot be avoided, then other mitigation measures as determined through Section 106 consultation would be implemented.

**No Action Alternative**

**Archaeological Resources**

Implementation of the following avoidance, minimization, and mitigation measure would avoid adverse impacts to unknown subsurface archaeological resources:

- If cultural materials are discovered during construction, all earth-moving activity within and around the immediate discovery area should be avoided until a qualified archaeologist can assess the nature and significance of the find.

**Historical Resources**

The following measures would avoid, minimize, or mitigate direct adverse impacts to historical resources during renovation of the Old Customs House:

- All renovation of the Old Customs House should conform to *The Secretary of the Interior’s Standards for the Treatment of Historic Properties*.
- Prior to alteration or removal of building features, detailed documentation of the Old Customs House should be completed as agreed to in the Section 106 consultation process.
If all adverse effects cannot be avoided, then other mitigation measures as determined through Section 106 consultation would be implemented.

The following measure would avoid indirect impacts to the International Building resulting from the No Action Alternative:

- Measures consistent with *The Secretary of the Interior’s Standards for the Treatment of Historic Properties* should be implemented as agreed to in the Section 106 consultation process.

**Hydrology and Floodplain**

**Six-lane Alternative, Ten-lane Alternative, and No Action Alternative**

Avoidance, minimization, and mitigation recommendations related to hydrology and floodplain include appropriate design, sizing, and location of proposed storm drain facilities, incorporation of applicable recommendations from detailed geotechnical investigations, and consideration of the location and extent of proposed retention/infiltration basins with respect to potential surficial saturation issues.

**Water Quality and Stormwater**

**Six-lane Alternative, Ten-lane Alternative, and No Action Alternative**

Water quality and stormwater runoff impacts would be addressed through conformance with the applicable NPDES Construction Permit, Municipal Permit and related City standards. Associated BMPs and the Project SWPPP would define measures to address potential effects associated with short-term construction (erosion and sedimentation, construction-related hazardous materials, demolition-related debris generation, and disposal of extracted groundwater) and long-term operation and maintenance (site design/low impact development BMPs, source control BMPs, treatment control BMPs, and post-construction BMP monitoring/maintenance schedules and responsibilities).

**Geology/Soils/Seismicity/Topography**

**Six-lane Alternative, Ten-lane Alternative, and No Action Alternative**

Avoidance, minimization, and mitigation recommendations related to geotechnical issues would include incorporation of appropriate design and construction measures to accommodate potential seismic and non-seismic hazards, if applicable, pursuant to associated industry/regulatory standards (e.g., the IBC) and subsequent detailed geotechnical analysis.

**Paleontology**

**Six-lane Alternative, Ten-lane Alternative, and No Action Alternative**

Avoidance, minimization, and mitigation recommendations related to paleontology would involve preparing and implementing a Paleontological Monitoring Plan to be approved by the Project applicant. The Paleontological Monitoring Plan would likely include the following types of measures in accordance with standard construction practices in southern California, with detailed requirements to be determined during the plan preparation and approval process:
A Qualified Paleontologist should be present at pre-grading meetings to consult with grading/excavation contractors regarding the potential location and nature of paleontological resources and associated monitoring/recovery operations. A Qualified Paleontologist is defined as an individual with an M.S. or Ph.D. in paleontology or a related field, and who has knowledge of local paleontological resources and documented experience in field identification and collection of fossil materials.

A Qualified Paleontologist or Paleontological Monitor (working under the direction of the Qualified Paleontologist), should be on site to monitor for paleontological resources during all original grading/excavation activities involving previously undisturbed areas of the Otay Formation and/or Old Paralic Deposits. A Paleontological Monitor is defined as an individual with at least one year of experience in field identification and collection of fossil materials.

If paleontological resources are discovered, the Qualified Paleontologist (or Paleontological Monitor) should implement appropriate salvage operations, potentially including simple excavation, plaster-jacketing of large and/or fragile specimens, or quarry excavations for richly fossiliferous deposits. The Qualified Paleontologist and Paleontological Resources Monitor should be authorized to halt or divert construction work in salvage areas to allow for the timely recovery of fossil remains.

Paleontological resources collected during the monitoring and salvage portion of the mitigation program should be cleaned, repaired, sorted, and cataloged pursuant to accepted industry methods.

Prepared fossils, along with copies of all pertinent field notes, photos and maps, should be deposited in an approved scientific institution with paleontological collections.

A final report should be prepared by the Qualified Paleontologist to describe the results of the mitigation program, including field and laboratory methods, stratigraphic units encountered, and the nature and significance of recovered paleontological resources.

**Hazardous Waste/Materials**

**Six-lane Alternative, Ten-lane Alternative, and No Action Alternative**

The following avoidance, minimization, and mitigation measures would effectively avoid or address potential impacts related to hazardous waste/materials:

- Soil sampling should be conducted in areas within the Revised Project Footprint proposed to be disturbed and/or excavated prior to soil export, reuse, or disposal to characterize the soil for the presence of hazardous materials (e.g., metals, petroleum hydrocarbons, VOCs, pesticides, etc.). If contaminated soil is present, appropriate abatement actions should be implemented in accordance with applicable regulatory requirements.

- Health risk assessments should be conducted for facilities within the LPOE in which contamination has been documented to evaluate whether the levels of contaminants would pose a risk to human health.

- Prior to commencement of excavation activities, a Site and Community Health and Safety Plan should be prepared to manage potential health and safety hazards to workers and the public.
Prior to commencement of excavation activities, a Soil Management Plan should be prepared to address the notification, monitoring, sampling, testing, handling, storage, and disposal of contaminated media or substances that may be encountered during construction activities.

Prior to commencement of excavation activities, a Groundwater Management Plan should be prepared to address the notification, monitoring, sampling, testing, handling, storage, and disposal of potentially contaminated groundwater.

Existing transformers and elevator equipment within the Revised Project Footprint should be sampled for PCB content if proposed to be disturbed and/or moved during construction activities. If PCBs are present, appropriate abatement actions for their disposal should be implemented in accordance with regulatory requirements, and soil beneath transformers and/or elevators should be evaluated for evidence of releases. If present in underlying soils, appropriate abatement actions for removal and disposal should be implemented in accordance with applicable regulatory requirements.

Wastes and potentially hazardous waste within the Revised Project Footprint, including trash, debris piles, and equipment, should be removed and recycled and/or disposed of off site, in accordance with applicable regulatory requirements.

Prior to renovation or demolition of existing structures, surveys should be conducted to evaluate the presence, locations, and quantities of hazardous building materials (ACMs and LCSs). Suspect materials should be sampled and analyzed, and if present, appropriate abatement actions should be implemented in accordance with applicable regulatory requirements.

Contract specifications should include references to the potential to encounter contaminated soil, groundwater, or other regulated wastes during construction activities.

### Air Quality and Greenhouse Gas Emissions

#### Six-lane Alternative, Ten-lane Alternative, and No Action Alternative

Although no adverse air quality or GHG impacts would occur, the following measures would help minimize construction-related criteria air pollutant emissions and GHG emissions to the extent feasible:

- Suspend grading and earth moving when wind gusts exceed 25 mph unless the soil is wet enough to prevent dust plumes.
- Cover trucks when hauling loose material.
- Stabilize the surface of materials stockpiles if not removed immediately.
- Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.
- Trucks should be washed off as they leave the construction site(s), as necessary, to control fugitive dust emissions.
- Track-out reduction measures such as gravel pads should be used at access points to minimize dust and mud deposits on roads affected by construction traffic.
- Construction equipment and vehicles should be properly tuned and maintained. Low sulfur fuel should be used in all construction equipment.
- Minimize unnecessary vehicular and machinery activities.
• Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
• Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.
• Locate construction equipment and truck staging and maintenance areas as far as feasible and nominally downwind of schools, active recreation areas, and other areas of high population density.
• To the extent feasible, construction traffic should be routed and scheduled to reduce congestion and related air quality impacts caused by idling vehicles along local roads during peak travel times.
• Provide landscaping where possible, which reduces surface warming and decreases CO₂ through photosynthesis.
• Use lighter color surfaces, such as Portland cement, which helps to increase the albedo effect (i.e., surface reflectivity of the sun’s radiation) and cool the surface.
• Use of energy efficient lighting.

Energy

Six-lane Alternative, Ten-lane Alternative, and No Action Alternative

The following avoidance and minimization measures would be implemented during construction activities:

• Construction equipment and vehicles should be properly tuned and maintained.
• Idling times of construction equipment should be minimized, to the extent practical.
• To the extent feasible, construction traffic should be routed and scheduled to reduce congestion and related air quality impacts caused by idling vehicles along local roads during peak travel times.

Biological Resources

Six-lane Alternative

Implementation of the following avoidance, minimization, and mitigation measures would avoid or reduce indirect impacts to biological resources resulting from the Six-lane Alternative:

• Prior to the commencement of construction, jurisdictional areas and sensitive vegetation within the Revised Project BSA should be fenced with orange plastic exclusionary fencing, and no personnel, debris, or equipment would be allowed within the jurisdictional areas.
• Impacts to 0.08 acre of non-wetland WUS should be mitigated at a 1:1 ratio through purchase of mitigation credits equal to 0.08 acre of ephemeral drainage at an approved mitigation bank.
• If removal of habitat and/or construction activities is necessary adjacent to nesting habitat during the bird breeding season (January 15 to September 15), the GSA shall retain an approved biologist to conduct a pre-construction survey to determine the
Appendix A

Summary of Avoidance, Minimization, and/or Mitigation Measures

The presence or absence of: (1) non-listed nesting migratory birds on, or within, 100 feet of the construction area; (2) Federally- or State-listed birds on, or within, 300 feet of the construction area; and (3) nesting raptors within 500 feet of the construction area. The pre-construction survey will be conducted within 10 calendar days prior to the start of construction. The results of the survey will be submitted to the GSA for review and approval prior to initiating any construction activities.

- If nesting birds are detected by the approved biologist, the following buffers will be established: (1) no work will occur within 100 feet of a non-listed nesting migratory bird nest; (2) no work will occur within 300 feet of a listed bird nest; and (3) no work will occur within 500 feet of a raptor nest. If construction within these buffers cannot be avoided, GSA, in consultation with the resource agencies, will determine the appropriate buffer.

Ten-lane Alternative

Implementation of the following avoidance, minimization, and mitigation measures would avoid or reduce indirect impacts to biological resources resulting from the Ten-lane Alternative:

- Prior to the commencement of construction, jurisdictional areas and sensitive vegetation within the Revised Project BSA should be fenced with orange plastic exclusionary fencing, and no personnel, debris, or equipment would be allowed within the jurisdictional areas.
- Impacts to 0.07 acre of non-wetland WUS should be mitigated at a 1:1 ratio through purchase of mitigation credits equal to 0.08 acre of ephemeral drainage at an approved mitigation bank.
- Impacts to 0.02 acre of disturbed wetland should be mitigated at a 2:1 ratio through a combination of creation, restoration, enhancement, and acquisition (at an approved mitigation bank) of 0.04 acre of wetlands.
- If removal of habitat and/or construction activities is necessary adjacent to nesting habitat during the bird breeding season (January 15 to September 15), the GSA shall retain an approved biologist to conduct a pre-construction survey to determine the presence or absence of: (1) non-listed nesting migratory birds on, or within, 100 feet of the construction area; (2) Federally- or State-listed birds on, or within, 300 feet of the construction area; and (3) nesting raptors within 500 feet of the construction area. The pre-construction survey will be conducted within 10 calendar days prior to the start of construction. The results of the survey will be submitted to the GSA for review and approval prior to initiating any construction activities.
- If nesting birds are detected by the approved biologist, the following buffers will be established: (1) no work will occur within 100 feet of a non-listed nesting migratory bird nest; (2) no work will occur within 300 feet of a listed bird nest; and (3) no work will occur within 500 feet of a raptor nest. If construction within these buffers cannot be avoided, GSA, in consultation with the resource agencies, will determine the appropriate buffer.

No Action Alternative

Implementation of the following avoidance, minimization, and mitigation measures would avoid or reduce indirect impacts to biological resources resulting from the No Action Alternative:
During construction of the Preferred Alternative, jurisdictional areas and sensitive vegetation within the BSA should be fenced with orange plastic exclusionary fencing, and no personnel, debris, or equipment would be allowed within the jurisdictional areas.

Impacts to 0.07 acre of non-wetland WUS should be mitigated at a 1:1 ratio through purchase of mitigation credits equal to 0.07 acre of ephemeral drainage at an approved mitigation bank.

If removal of habitat and/or construction activities is necessary adjacent to nesting habitat during the bird breeding season (January 15 to September 15), the GSA shall retain an approved biologist to conduct a pre-construction survey to determine the presence or absence of: (1) non-listed nesting migratory birds on, or within, 100 feet of the construction area; (2) Federally- or State-listed birds on, or within, 300 feet of the construction area; and (3) nesting raptors within 500 feet of the construction area. The pre-construction survey will be conducted within 10 calendar days prior to the start of construction. The results of the survey will be submitted to the GSA for review and approval prior to initiating any construction activities.

If nesting birds are detected by the approved biologist, the following buffers will be established: (1) no work will occur within 100 feet of a non-listed nesting migratory bird nest; (2) no work will occur within 300 feet of a listed bird nest; and (3) no work will occur within 500 feet of a raptor nest. If construction within these buffers cannot be avoided, GSA, in consultation with the resource agencies, will determine the appropriate buffer.

**Cumulative Impacts**

**Traffic and Transportation/Pedestrian and Bicycle Facilities**

A primary Project goal in support of the Project purpose is to increase the processing capacity and efficiency of the LPOE in response to the need that is created by the current and projected demand for vehicles and persons to cross the border. Thus, the Revised Project or Approved Project would not directly generate a substantial volume of traffic, but would accommodate existing and projected border crossing demand. They would also modify the patterns of traffic flow in the project area. The purpose and need for the Revised Project and Approved Project do not include local roadway improvements; however, the SEIS considers all traffic impacts and identifies measures that would help avoid, minimize, or mitigate such impacts, as outlined below. NEPA requires the decision-maker to consider the impacts of the proposed action, but does not require the agency to adopt such measures. GSA will consider adopting and implementing measures that are determined to be feasible and consistent with existing laws, regulations, and authorities applicable to GSA, particularly with regard to the availability of, and authority to expend, funds. Authorized funds may not be available to implement all of the proposed mitigation measures. Any mitigation measures adopted by the agency will be identified in the ROD.

**Six-lane Alternative and Ten-lane Alternative**

Implementation of the following avoidance, minimization, and mitigation measures would avoid or reduce cumulative traffic impacts to roadway segments and intersections resulting from the Action Alternatives:

- Widening the segment of Camino de la Plaza, between Virginia Avenue and the I-5 southbound ramps, to Four-lane Collector standards.
Appendix A
Summary of Avoidance, Minimization, and/or Mitigation Measures

- Widening the segment of Camino de la Plaza, between the I-5 southbound ramps and East San Ysidro Boulevard, to Four-lane Major standards.
- Widening of Camino de la Plaza to provide an additional dedicated right-turn lane onto East San Ysidro Boulevard.
- Installation of a traffic signal at the Camino de la Plaza/Virginia Avenue intersection.
- Re-striping of the northbound approach of Camino de la Plaza to provide one shared left-turn/through lane and a dedicated right-turn lane with an overlap phase, and widening the southbound approach to provide one exclusive left-turn lane and a shared through/right-turn lane.

No Action Alternative

Implementation of the following avoidance, minimization, and mitigation measures would avoid or reduce cumulative traffic impacts to roadway segments and intersections resulting from the No Action Alternative:

- Widening of the segment of Camino de la Plaza, between Virginia Avenue and the I-5 southbound ramps to Four-lane Major standards.
- Installation of a traffic signal at the Camino de la Plaza/Virginia Avenue intersection.
- Re-striping of the I-5 southbound ramps at Camino de la Plaza to one southbound left-turn lane, one southbound right-turn lane, one southbound shared through/right-turn lane, and one westbound through lane.

Air Quality and Greenhouse Gas Emissions

Six-lane Alternative, Ten-lane Alternative, and No Action Alternative

Implementation of the avoidance, minimization, and mitigation measures identified previously above for Air Quality and Greenhouse would avoid or reduce cumulative air quality impacts.
LIST OF ACRONYMS AND ABBREVIATIONS
<table>
<thead>
<tr>
<th>Acronym</th>
<th>Definition</th>
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</thead>
<tbody>
<tr>
<td>AADT</td>
<td>annual average daily traffic</td>
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<tr>
<td>ABA</td>
<td>Architectural Barriers Act</td>
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<td>ABAAS</td>
<td>Architectural Barriers Act Accessibility Standards</td>
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<td>ACMs</td>
<td>asbestos-containing materials</td>
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<td>ADA</td>
<td>Americans with Disabilities Act</td>
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<td>aerially-deposited lead</td>
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<td>ADT</td>
<td>average daily traffic</td>
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<td>AMSL</td>
<td>above mean sea level</td>
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<td>APE</td>
<td>Area of Potential Effect</td>
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<td>APN</td>
<td>Assessor Parcel Number</td>
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<td>AQTR</td>
<td>Air Quality Technical Report</td>
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<td>AST</td>
<td>aboveground storage tank</td>
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<td>Bureau of Land Management</td>
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<td>BMPs</td>
<td>Best Management Practices</td>
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<td>BMP Update</td>
<td>Bicycle Master Plan Update</td>
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<td>B.P.</td>
<td>Before Present</td>
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<td>BRT</td>
<td>Bus Rapid Transit</td>
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<td>BSA</td>
<td>Biological Study Area</td>
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<td>CAA</td>
<td>Clean Air Act, as amended in 1990</td>
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<td>CalEEMod</td>
<td>California Emission Estimator Model</td>
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<td>Caltrans</td>
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<td>Comprehensive Environmental Response, Compensation and Liability Act of 1980</td>
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<td>Code of Federal Regulations</td>
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<td>CH₄</td>
<td>methane</td>
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<td>City of San Diego</td>
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<td>CNDDDB</td>
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<td>CO</td>
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<td>CO₂e</td>
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<td>Corps</td>
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<td>DPM</td>
<td>diesel particulate matter</td>
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<td>DOT</td>
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<td>Acronym</td>
<td>Full Form</td>
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<td>EIR</td>
<td>Environmental Impact Report</td>
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<td>EIS</td>
<td>Environmental Impact Statement</td>
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<td>EO</td>
<td>Executive Order</td>
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<td>F</td>
<td>Fahrenheit</td>
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<td>Federal Insecticide, Fungicide and Rodenticide Act</td>
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<td>GWP</td>
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<td>I</td>
<td>Interstate</td>
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<td>IBC</td>
<td>International Building Code</td>
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<td>Immigration and Customs Enforcement</td>
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<td>IPaC</td>
<td>Information, Planning, and Conservation System</td>
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<td>ISA</td>
<td>Initial Site Assessment</td>
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<td>LCS</td>
<td>lead-containing surface</td>
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<td>LEED</td>
<td>Leadership in Energy and Environmental Design</td>
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<td>LOS</td>
<td>level of service</td>
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<td>LPOE</td>
<td>Land Port of Entry</td>
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<td>MBTA</td>
<td>Migratory Bird Treaty Act</td>
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<td>mph</td>
<td>miles per hour</td>
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<td>MPO</td>
<td>metropolitan planning organization</td>
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<td>MSATs</td>
<td>Mobile Source Air Toxics</td>
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<td>MSCP</td>
<td>Multiple Species Conservation Plan</td>
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<td>metric tons</td>
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<td>Metropolitan Transit System</td>
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<td>NAAQS</td>
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<td>Native American Heritage Commission</td>
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<td>NEPA</td>
<td>National Environmental Policy Act</td>
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<td>NES-MI</td>
<td>Minimal Impacts Natural Environment Study</td>
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<td>NHPA</td>
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<td>NHTSA</td>
<td>National Highway Traffic Safety Administration</td>
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<td>NOx</td>
<td>nitrogen oxides</td>
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<td>nitrogen dioxide</td>
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<td>N₂O</td>
<td>nitrous oxide</td>
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<td>NOA</td>
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<td>NPDES</td>
<td>National Pollutant Discharge Elimination System</td>
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<td>NRHP</td>
<td>National Register of Historic Places</td>
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Appendix B
List of Acronyms and Abbreviations

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Definition</th>
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<tr>
<td>O₃</td>
<td>Ozone</td>
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<td>Occupational Safety and Health Act</td>
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<td>Lead</td>
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<tr>
<td>PCB</td>
<td>Polychlorinated biphenyls</td>
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<td>PFC</td>
<td>Perfluorocarbons</td>
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<td>PM</td>
<td>Particulate matter</td>
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<tr>
<td>PM₂.₅</td>
<td>Fine particulate matter with a diameter of 2.5 microns or less</td>
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<tr>
<td>PM₁₀</td>
<td>Respirable particulate matter with a diameter of 10 microns or less</td>
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<td>POV</td>
<td>Privately owned vehicle</td>
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<td>ppm</td>
<td>Parts per million</td>
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<td>PRC</td>
<td>California Public Resources Code</td>
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<td>RCP</td>
<td>Regional Comprehensive Plan</td>
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<td>Resource Conservation and Recovery Act of 1976</td>
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<td>ROD</td>
<td>Record of Decision</td>
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<td>ROG</td>
<td>Reactive organic gases</td>
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<td>ROW</td>
<td>Right of way</td>
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<td>RTIP</td>
<td>Regional Transportation Improvement Program</td>
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<td>RTP</td>
<td>Regional Transportation Plan</td>
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<td>RWQCB</td>
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<td>SAM</td>
<td>Site assessment and mitigation</td>
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<td>SANDAG</td>
<td>San Diego Association of Governments</td>
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<td>SB</td>
<td>Senate Bill</td>
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<td>SBI</td>
<td>Secure Border Initiative</td>
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<td>SCIA</td>
<td>Supplemental Community Impact Assessment</td>
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<td>SCIC</td>
<td>South Coastal Information Center</td>
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<td>SDAB</td>
<td>San Diego Air Basin</td>
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<td>SDAPCD</td>
<td>San Diego Air Pollution Control District</td>
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<td>SDIV</td>
<td>San Diego and Imperial Valley</td>
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<td>SEIS</td>
<td>Supplemental Environmental Impact Statement</td>
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<td>SF₆</td>
<td>Sulfur hexafluoride</td>
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<td>SIP</td>
<td>State Implementation Plan</td>
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<td>SLIC</td>
<td>Spills, Leaks, Investigations, and Cleanups database</td>
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<td>SO₂</td>
<td>Sulfur dioxide</td>
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<td>SR</td>
<td>State Route –</td>
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<td>SRA</td>
<td>Subregional Area</td>
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<td>SWEEPS</td>
<td>Statewide Environmental Evaluation and Planning System database</td>
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<td>SWMP</td>
<td>Storm Water Management Plan</td>
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<td>SWPPP</td>
<td>Storm Water Pollution Prevention Plan</td>
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<td>SYCP</td>
<td>San Ysidro Community Plan</td>
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<td>SYITC</td>
<td>San Ysidro Intermodal Transportation Center</td>
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<td>SYRA</td>
<td>San Ysidro Redevelopment Area</td>
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<td>TIS</td>
<td>Traffic Impact Study</td>
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<td>TMP</td>
<td>Traffic Management Plan</td>
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<td>TPH</td>
<td>Total petroleum hydrocarbons</td>
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<td>TSCA</td>
<td>Toxic Substances Control Act</td>
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<tr>
<td>Acronym</td>
<td>Description</td>
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<td>UFAS</td>
<td>Uniform Federal Accessibility Standards</td>
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<td>U.S.</td>
<td>United States</td>
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<td>USDA</td>
<td>U.S. Department of Agriculture</td>
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<td>USEPA</td>
<td>U.S. Environmental Protection Agency</td>
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<td>USFWS</td>
<td>U.S. Fish and Wildlife Service</td>
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<td>UST</td>
<td>underground storage tank</td>
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<td>US-VISIT</td>
<td>U.S. Visitor and Immigrant Status Indicator Technology program</td>
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<td>V/C</td>
<td>volume-to-capacity ratio</td>
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<td>VMT</td>
<td>vehicle miles traveled</td>
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<td>VOCs</td>
<td>volatile organic compounds</td>
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<td>WHTI</td>
<td>Western Hemisphere Travel Initiative</td>
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<tr>
<td>WUS</td>
<td>Waters of the U.S.</td>
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LIST OF TECHNICAL STUDIES

The following technical studies were prepared to support this SEIS:


