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December 4, 2008

In Reply Refer To: GSA081014A

Jane Lehman
Regional Historic Preservation Officer
U.S. General Services Administration
Pacific Rim Region
450 Golden Gate Avenue
San Francisco, California 94102-3434

Re: Proposed Expansion and Reconfiguration of Existing Facilities at the San Ysidro Port of Entry Border Station, San Diego County, California.

Dear Ms. Lehman:

Thank you for initiating consultation with me in regards to the proposed undertaking at the San Ysidro Port of Entry (POE) Border Station in San Diego County. Pursuant to 36 CFR Part 800 (as amended 8-05-04) regulations implementing Section 106 of the National Historic Preservation Act (NHPA), the General Services Administration (GSA) is the lead Federal agency for this undertaking and is seeking my comments on the effects that the proposed project will have on historic properties. At this time, in your letter of October 10, 2008 and attachments, you are identifying your Area of Potential Effects for this undertaking, describing your historic property identification efforts to date, and describing the three alternatives proposed for this undertaking, all of which will result in an adverse effect to historic properties.

In addition to your letters (2) of October 10, 2008 and attachments, you have submitted the following reports as evidence of your efforts to identify and evaluate historic properties:

- Historic Properties Survey Report for the San Ysidro Border Station Expansion San Diego County, California (Richard L. Carrico, Mooney & Associates: March 2004).
- Relocation Study Final Report: United States Customs House San Ysidro, California (Page & Turnbull, Inc.: July 29, 2008).

After reviewing your letter and supporting documentation, I have the following comments:

- 1) I concur that the Area of Potential Effects (APE) has been determined appropriately pursuant to 36 CFR Parts 800A(a)(1) and 800.16(d).
- 2) Although it is obvious that this undertaking will have an adverse effect to the U.S. Customs House under all three alternatives, you have yet to complete your historic property identification and evaluation efforts pursuant to 36 CFR Part 80004. Specifically, your identification efforts are deficient in the following areas:

- Record Search Results (Appendix A) were not submitted with your letter and supporting documentation. The cover sheet for Appendix A states that this data is provided as a separate GSA081014A 12/4/08 confidential appendix, which was not included in your consultation package. Please provide a copy of this record search.

- You have yet to provide documentation of your Native American consultation efforts. The single document provided in your consultation package, that being an undated letter from Richard L. Carrico to the California Native American Heritage Commission refers to previous studies in the project area. Please provide evidence of consultation with federally recognized tribes and other Native American groups and individuals as identified by the Native American Heritage Commission for the subject undertaking.

- I am uncertain as to the adequacy of the historic properties survey (Carrico; Mooney and Associates: 2004) regarding the APE of this project as this study refers to the NRHP-listed U.S. Customs House as being located outside of the project APE, while all three of the alternatives described for this undertaking not only clearly place it within the APE, but state that it will be adversely affected under all proposed alternatives. Please explain this discrepancy.

- Your efforts to evaluate architectural historic properties in the project APE have not been completed or documented pursuant to 36 CFR Part 800.4. Statements in your consultation letter on pages 3 and 5 include "of the five buildings that are likely over 50 years old, we believe that one building (international building) may be potentially eligible for the NRHP at the local level, and "Our preliminary determinations is that these buildings (Greyhound Station and Payless Shoes building) are not eligible for the NRHP." You also note "Further study of these buildings is being carried out concurrently as part of the preparation of an Environmental Assessment for this project." Until such time as I can review and comment on these additional studies and evaluations, including your request for my concurrence on your determinations of NRHP eligibility of those buildings in questions, I cannot concur on a finding of effect for this undertaking as all potentially eligible historic properties have not been evaluated under NRHP criteria.

3) I am not familiar with the guidelines for post-review discoveries in GSA ADM 1020.2 Procedures for Historic Properties as stated on page 5 of your letter of October 10, 2008. Please provide a copy of these guidelines for my review.

4) Please keep me apprised of the date of the proposed onsite meeting at the San Ysidro POE. I will be available to continue this consultation when the GSA has provided additional information regarding those issues that I have identified above. If you require further information, please contact William Soule, Associate State Archeologist, at phone 916-654-4614 or email wsoule@parks.ca.gov.

Sincerely,
Milford Wayne Donaldson, FAIA
State Historic Preservation Officer