



**OTAY MESA LAND PORT OF ENTRY  
MODERNIZATION AND EXPANSION  
DRAFT ENVIRONMENTAL IMPACT STATEMENT OVERVIEW  
OTAY MESA, CALIFORNIA**



**General Services Administration**

**Pacific Rim Region**

**August 2018**

## GENERAL INFORMATION ABOUT THIS DOCUMENT

The United States (U.S.) General Services Administration (GSA) proposes the modernization and expansion of the existing Otay Mesa Land Port of Entry (LPOE). The Otay Mesa LPOE is located in Otay Mesa, a community in the southern section of the City of San Diego, California, just north of the international border between the U.S. and Mexico. The GSA has prepared this Draft Environmental Impact Statement (DEIS), which examines the purpose and need for this project; alternatives considered; the existing environment that could be affected; and the potential impacts resulting from each of the alternatives; and proposes best management practices and/or mitigation measures.

The views and comments of the public are necessary to help determine the scope and content of the environmental analysis. A DEIS public meeting will be held on Wednesday, September 5, 2018 from 4 to 7 PM at:

Holiday Inn Express and Suites San Diego  
2296 Niels Bohr Court  
San Diego, CA 92154  
619-710-0900

Comments on the Draft EIS must be received by Tuesday, October 9, 2018 and emailed to [osmahn.kadri@gsa.gov](mailto:osmahn.kadri@gsa.gov) or sent to:

General Services Administration  
Attention: Osmahn Kadri, NEPA Project Manager  
50 United Nations Plaza, 3345 Mailbox #9  
San Francisco, CA 94102

For individuals with sensory disabilities, this document can be made available in alternate formats. To obtain a copy in an alternate format, if special assistance is needed to attend and participate in the DEIS public meeting, or for further information concerning this DEIS, please contact Osmahn Kadri at the email or address provided above or call 415-522-3617.

After comments are received from the public and reviewing agencies, the GSA may (1) give environmental approval to the Project, (2) undertake additional environmental studies, or (3) abandon the Project. If the Project is given environmental approval and funding is appropriated, the GSA could design and construct all or part of the Project.

## INTRODUCTION

The Otay Mesa Land Port of Entry (LPOE) is located in Otay Mesa, a community in the southern section of the City of San Diego, California, just north of the international border between the United States (U.S.) and Mexico. The General Services Administration (GSA) proposes to reconfigure and expand the existing Otay Mesa LPOE. The GSA has prepared this Draft Environmental Impact Statement (DEIS) in compliance with the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321 *et seq.*) and other relevant Federal and state laws and regulations. This DEIS discloses the direct, indirect, and cumulative environmental impacts that would result from the proposed action and alternatives.

Otay Mesa is abutted on the north by the Otay River Valley and the City of Chula Vista, California; on the west by Interstate 805 and the neighborhoods of Ocean View Hills and San Ysidro; on the north and east by unincorporated San Diego County, including East Otay Mesa and the San Ysidro Mountains; and on the south by the Otay Centenario borough of Tijuana Municipality in Mexico. Major thoroughfares include Otay Mesa Road/California State Route 905, Otay Valley Road/Heritage Road, Siempre Viva Road and California State Route 125. The Otay Mesa LPOE is one of three ports of entry in the San Diego-Tijuana metropolitan region, connecting Otay Mesa and the City of San Diego with the Otay Centenario borough of Tijuana. Figure 1 shows the regional location of the Otay Mesa LPOE.

The Otay Mesa LPOE is owned by the General Services Administration (GSA) and operated by U.S. Department of Homeland Security (DHS) Customs and Border Protection (CBP). The LPOE houses personnel from the Food and Drug Administration (FDA); TTEC (including Secure Electronic Network for Travelers Rapid Inspection [SENTRI], Free and Secure Trade [FAST], and Global Entry), CBP, I-94 Processing, and Fines, Penalties, and Forfeitures (FP&F). When it was constructed in 1983, its primary purpose was to divert growing commercial truck traffic from the increasingly busy San Ysidro LPOE to the west at the southern terminus of Interstate 5 (I-5). The LPOE handles commercial and privately-owned vehicle (POV) and pedestrian traffic. Since the LPOE opened, vehicle and pedestrian traffic and the population and general development in the area have grown. It is now one of the ten busiest land ports in the country and is the busiest commercial port on the California-Mexico border, handling the second highest volume of trucks, and third highest dollar volume of trade among all U.S.-Mexico LPOEs (GSA, 2013).



Figure 1. Regional Location of the Otay Mesa LPOE

The Otay Mesa LPOE processes an average of approximately 16,000 POVs, 2,000 commercial trucks, 100 buses and 3,500 pedestrian inspections per day (GSA, 2013). Total commercial flows have increased by an average of 2.25 percent per year since 2005 (GSA, 2017a). Pedestrian traffic is expected to increase. In March of 2017, the San Diego Association of Governments (SANDAG) began constructing the South Bay Rapid, a new transit line connecting the existing Otay Mesa LPOE to downtown San Diego via eastern Chula Vista. SANDAG will also build a new transit center adjacent to the existing Otay Mesa LPOE so border crossers have a new travel choice in addition to driving. The transit line is expected to improve pedestrian connectivity between San Diego and the Otay Mesa LPOE. The GSA proposed to reconfigure, expand, and update the existing Otay Mesa LPOE. The proposed Otay Mesa LPOE improvements are herein referred to as the "Project." The anticipated maximum extent of disturbance, including improvements, staging areas, and temporary impacts resulting from Project construction is 13.5 acres (GSA, 2017a). Figure 2 shows the Project study area and vicinity.



**Figure 2. Otay Mesa LPOE Project Study Area and Vicinity**

## **PURPOSE AND NEED**

The Project's purpose, or the Project's goal, is to improve the efficiency, effectiveness, security and safety at the existing Otay Mesa LPOE. The Project's need, or the need to which the GSA is responding, is twofold. First is the need to increase the LPOE's capacity due to increased demand; second is the need to address public and employee safety and border security concerns.

### **Purpose of the Project**

The purpose of the Project is to improve operational efficiency, effectiveness, security and safety for cross-border travelers and Federal agencies at the Otay Mesa LPOE. More specifically, the goals of the Project are to:

- Increase vehicle and pedestrian inspection processing capacities at the Otay Mesa LPOE;
- Improve the safety of the Otay Mesa LPOE for employees of the LPOE and for commercial, POV and pedestrian traffic crossing the border;
- Modernize facilities to accommodate current and future demands and implementation of border security initiatives.

### **Need for the Project**

The need(s) for the Project is to increase the LPOE's capacity to process vehicle and pedestrian traffic and to address public and employee safety and border security concerns.

### **Additional Capacity**

As the only commercial port of entry in the San Diego area, the Otay Mesa LPOE is a major asset for the Southern California and Baja economies. In the 35 years since the Otay Mesa LPOE opened, commercial, POV and pedestrian traffic and the population and general development in the area have grown. This growth has rendered the staging areas and circulation capacity inadequate; the commercial port is no longer able to keep pace with commercial needs. Pedestrian processing is undersized as is and the planned development of a new transit center adjacent to the LPOE is expected to further increase congestion at pedestrian processing facilities.

More specifically, the over-capacity level of activity at the Otay Mesa LPOE (as well as at other regional LPOEs) causes excessive vehicle queueing. The average processing and wait time for commercial freight crossings at the Otay Mesa LPOE is currently between 1.5 and 2 hours, with 10 percent of commercial crossers waiting as long as four hours; these wait times are anticipated to increase in the future due to an increase in vehicle traffic (Caltrans/SANDAG, 2017a). Border delays in freight movement can result in increased transportation costs and interruptions in manufacturing and delivery cycles. With border processing times averaging more than two hours per truck, it is estimated that San Diego County loses approximately \$539 million in annual revenue from reduced freight activity. This translates to more than 2,900 jobs, or \$155 million in lost labor income per year (Caltrans/SANDAG, 2017a).

Cross-border travel is forecasted to continue to grow with local and regional growth and increasing bilateral commerce. Border delays are expected to increase proportionally, placing a further strain on existing facilities and infrastructure at the Otay Mesa LPOE. In addition, as mentioned in above, SANDAG is constructing a new transit facility adjacent to the Otay Mesa LPOE that is expected to further increase pedestrian traffic.

### **Safety and Security**

The Project will also address public and employee safety and border security concerns. Buildings within the inspection facilities are approximately 35 years old and cannot effectively support DHS infrastructure and enforcement operations. New security initiatives require increased capacity and new inspection technology to be installed and implemented at the existing facilities. For example, the detention areas in the main building do not meet current CBP design guide standards and expose the traveling public and officers to unnecessary risk. Due to the age and condition of the existing buildings, reconfiguration and renovation of the existing facilities is required to accommodate operational needs. Installation of energy and water conservation measures (WCMs), security system updates and safety improvements, lighting improvements, repaving of old asphalt surfaces and refurbishing of flooring and paint are all needed across the Otay Mesa LPOE.

### **Existing Facilities**

The Otay Mesa LPOE currently consists of the Pedestrian, Commercial Import and Export buildings and 12 POV inspection booths.

#### **Pedestrian Building**

The Pedestrian Building is located in between the POV and commercial inspection areas and handles pedestrian and bicycle processing operations. Currently, there are six pedestrian inspection lanes.

#### **Commercial Import Building and Commercial Inspection Lot**

The Commercial Import Building is used by CBP personnel to inspect commercial vehicles traveling from Mexico to the U.S. A majority of the import shipments are Mexican trucks that are completing the first leg of their round trip (i.e., from Mexico to the U.S. and then back into Mexico). The Commercial Import Building and the Commercial Inspection Lot are unable to handle the existing volume of commercial traffic experienced on a daily basis. Figure 3 shows the existing Commercial Import Building.





**Figure 3. Commercial Import Building at Existing Otay Mesa LPOE**

### **Commercial Export Building**

The Commercial Export Building is used by CBP personnel to inspect commercial vehicles traveling from the U.S. to Mexico. A majority of the export shipments are Mexican trucks that are completing their round trip back into Mexico.

### **Privately-Owned Vehicle Inspection Booths**

There are currently 12 POV primary inspection booths in operation at the Otay Mesa LPOE as shown in Figure 4. They are used by CBP personnel to inspect POVs and their occupants traveling from Mexico to the U.S. A secondary inspection lot is located north of the primary inspection booths and adjacent to the pedestrian bridge. It includes 28 inspection areas for CBP personnel to conduct a more thorough inspection of POVs suspected of containing contraband (i.e., secondary inspection), an impound lot (i.e., an area used to store POVs seized by CBP personnel), a canopy structure over the secondary inspection spaces and parking areas.



**Figure 4. POV Primary Inspection Booths at the Existing Otay Mesa LPOE**

## **DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES**

Per the Council on Environmental Quality (CEQ) regulations for implementing the National Environmental Policy Act (NEPA) at 40 Code of Federal Regulations (CFR) Part 1502.14, the Federal government must consider reasonable alternatives to a proposed action. Considering alternatives helps avoid unnecessary impacts and allows analysis of reasonable ways to achieve the stated purpose. To warrant detailed evaluation, an alternative must be reasonable. To be considered reasonable, an alternative must be ready for decision (any necessary preceding events must have taken place), affordable, capable of implementation, and must meet the purpose of and need for the action. Said otherwise, reasonable alternatives are practical or feasible from a common sense, technical and economic standpoint; and meet the Project's purpose and need. The Proposed Action, reasonable alternatives, and alternatives considered but eliminated from further analysis are described below.

### **PROPOSED ACTION ALTERNATIVES**

The Project entails the reconfiguration and expansion of the existing Otay Mesa Land Port of Entry (LPOE) to enhance traffic circulation, specifically the flow of commercial traffic, and to address the projected increase in vehicle traffic. Two Project build alternatives were considered by a multidisciplinary team during the Project design process, following a scoping meeting and consultation with the community. Because the Project concerns improvements to a LPOE, alternative Project locations were not considered because the precise location of such a facility requires a formal agreement between the Governments of the United States and Mexico. The alternatives described and evaluated in this Draft Environmental Impact Statement (DEIS) include the Preferred Alternative, the Reduced Build Alternative and the No Action Alternative.

### **Preferred Alternative (Alternative 1)**

The Preferred Alternative would include the development of an approximately 10-acre General Services Administration (GSA)-owned plot of land to the immediate east of the existing commercial import lot. The new lot would be used to construct commercial inspection buildings and additional commercial import lanes. Figure 5 shows the 10-acre lot in its current condition.



**Figure 5. GSA-Owned Lot Proposed for Development  
(viewed from northwest)**

Improvements to existing pedestrian lanes (located in the Pedestrian Building) and personal vehicle inspection lanes; relocation of personnel currently housed in the Pedestrian, Commercial Import and Commercial Export buildings; renovation of existing facilities throughout the Otay Mesa LPOE; and demolition of facilities that would no longer be needed would also occur under the Preferred Alternative. New construction would include commercial import and exit booths, six additional pedestrian lanes in the Pedestrian Building, a Commercial Annex Building (CAB), a return-to-Mexico lane for commercial traffic, a pedestrian ramp and parking areas for the new commercial lot. Building renovations would include the installation of energy conservation measures (ECMs) and water conservation measures (WCMs) across the Otay Mesa LPOE, the correction of deficiencies throughout existing facilities (e.g., updating security systems, improving lighting and repaving old asphalt surfaces), and refurbishing the interior of the pedestrian, commercial import and commercial export buildings (e.g., new flooring and paint).

During and after construction, personnel would be relocated to the new CAB building. These include personnel from the FDA; TTEC (including Secure Electronic Network for Travelers Rapid Inspection [SENTRI], Free and Secure Trade [FAST], and Global Entry); Customs and Border Protection (CBP); I-94 Processing; and Fines, Penalties & Forfeiture (FP&F) paralegal personnel. All facilities that are no longer needed would be demolished and the land they were on would either be backfilled or used for the expansion of other facilities. Additional detail about the new/impacted facilities is included in the following subsections.

### **Reduced Build Alternative (Alternative 2)**

The Reduced Build Alternative would include many of the activities discussed under the Preferred Alternative; however, the overall activity level would be lower. Notably, no new construction would occur on the 10-acre, GSA-owned plot of land located east of the Commercial Import Building; The Reduced Build Alternative would not include construction of the CAB and therefore not any of activities related to construction of the CAB. Instead, commercial inspection booths would be reconfigured to increase traffic flow. The Reduced Build Alternative would still include the renovation of existing facilities, but activities

would be limited to updating security systems and HVAC systems and repainting interiors; implementation of ECMs and WCMs would not occur with these minor renovations. Specific components of the Reduced Build Alternative are described further in the following subsections.

### **NO ACTION ALTERNATIVE**

The No Action Alternative is included and analyzed to provide a baseline for comparison with impacts from the Project and also to satisfy Federal requirements for analyzing “no action” under NEPA (40 CFR 1502.14(d)).

The No Action Alternative assumes that no construction or renovations to the existing Otay Mesa LPOE would occur. Minor repairs would occur as needed and maintenance and operation of the existing facilities would continue as described above. As under the Preferred and Reduced Build Alternatives, the existing USDA Plant Inspection Station would be moved to a new standalone building in the northwest corner of the 10-acre, GSA-owned plot of land located east of the existing commercial import lot.

This alternative would not meet the purpose and need of the Project (as identified above) as the modernization and expansion of existing facilities to address deficiencies in the effectiveness of the Otay Mesa LPOE would not occur.

### **COMPARISON OF PREFERRED, REDUCED BUILD AND NO ACTION ALTERNATIVES**

Table 1 compares the Preferred, Reduced Build and No Action Alternatives by Project element, or element of the Preferred Action Alternative. Proposed activities at each of the Project elements are described for each alternative. Project elements include the CAB; Pedestrian Building; Commercial Export Building; Commercial Import Building and Commercial Inspection Lot; Renovations at Existing Buildings; Other New Construction; and Sustainability.

**Table 1. Comparison of Preferred, Reduced Build and No Action Alternatives**

Project Element	Preferred Alternative (Alternative 1)	Reduced Build Alternative (Alternative 2)	No Action Alternative
Commercial Annex Building (CAB)	Construct new CAB, including office space, temporary holding cells, a watch tower, storage space for equipment and supplies.	New CAB would not be constructed.	New CAB would not be constructed.
Pedestrian Building	<ul style="list-style-type: none"> <li>• Add six new pedestrian lanes and refurbish six existing pedestrian lanes (ultimately a total of 12 lanes).</li> <li>• Relocate SENTRI and I-94 Processing personnel to new CAB and use vacated space for new detention center and soft secondary.</li> </ul>	No renovation or activities would occur at the Pedestrian Building.	No renovation or activities would occur at the Pedestrian Building.
Commercial Export Building	<ul style="list-style-type: none"> <li>• Relocate FP&amp;F processing and records storage space to CAB; reconfigure and renovate vacant space for CBP's Training Center needs.</li> <li>• Demolish hazardous materials docks.</li> <li>• Relocate existing hazardous materials docks to new CAB.</li> </ul>	No renovation or activities would occur at the Commercial Export Building.	No renovation or activities would occur at the Commercial Export Building.
Commercial Import Building and Commercial Inspection Lot	<ul style="list-style-type: none"> <li>• Move existing USDA Plant Inspection Station to a new standalone building on the 10-acre, GSA-owned lot.</li> <li>• Construct nine new commercial lanes (six laden, three unladen) and additional commercial inspection and exit booths.</li> </ul>	<ul style="list-style-type: none"> <li>• Move existing USDA Plant Inspection Station to a new standalone building on the 10-acre, GSA-owned lot.</li> <li>• Pave 10-acre plot of GSA-owned land.</li> <li>• Relocate or extend two commercial exit booths onto newly paved, 10-acre, GSA-owned plot of land.</li> </ul>	Move existing USDA Plant Inspection Station to a new standalone building on the 10-acre, GSA-owned lot.

Project Element	Preferred Alternative (Alternative 1)	Reduced Build Alternative (Alternative 2)	No Action Alternative
Renovations at Existing Buildings	<p>Renovations could include:</p> <ul style="list-style-type: none"> <li>Updating HVAC systems as necessary to meet current building codes;</li> <li>Updating security systems (e.g., installing new/updated computer systems, fingerprinting equipment, ID camera equipment and Personal Identity Verification stations); and</li> <li>Refurbishing the interior of the pedestrian, commercial import, and commercial export buildings (e.g., repainting, installing new flooring, improving lighting and repaving parking areas).</li> </ul>	<p>Renovations could include:</p> <ul style="list-style-type: none"> <li>Updating HVAC systems as necessary to meet current building codes;</li> <li>Updating security systems (e.g., installing new/updated computer systems, fingerprinting equipment, ID camera equipment and Personal Identity Verification stations); and</li> <li>Refurbishing activities limited to repainting the interior of the pedestrian, commercial import, and commercial export buildings.</li> </ul>	<p>No renovations would occur at the pedestrian, commercial import, and commercial export buildings. Minor repairs would occur as needed and current maintenance and operation of the existing facilities would continue as described in Chapter 1.</p>
Other New Construction	<p>Could include:</p> <ul style="list-style-type: none"> <li>Pedestrian path improvements and a new north-side ramp from the existing pedestrian bridge to the South Bay Rapid Transit system at the SR-905 on-ramp;</li> <li>A return-to-Mexico lane at the new commercial import lot for trucks sent back to Mexico;</li> <li>Parking areas for the new CAB and commercial import lot; and</li> <li>FMCSA bus safety inspection facility.</li> </ul>	<p>No new construction would occur.</p>	<p>No new construction would occur.</p>
Sustainability	<p>ECMs and WCMs would be implemented at all newly constructed and substantially renovated facilities to obtain at least LEED Gold certification.</p>	<p>Minor renovations would not include the implementation of ECMs or WCMs.</p>	<p>ECMs and WCMs would not be implemented.</p>

## **ALTERNATIVES CONSIDERED AND DISMISSED FROM DETAILED ANALYSIS**

In addition to the Preferred and Reduced Build Alternatives, the Expanded Build Alternative was considered as a potential alternative during the Project design process. This alternative and the reasons for its elimination from further analysis are discussed below.

### **Expanded Build Alternative**

The Expanded Build Alternative includes all of the activities discussed under the Preferred Alternative plus some additional improvements to the privately-owned vehicle (POV), pedestrian and commercial inspection facilities. Otay Mesa LPOE's POV inspection capabilities would be expanded by constructing 23 northbound POV lanes, 27 inspection booths (four of the lanes would be double-stacked), 52 POV secondary inspection spaces, a new canopy structure over the secondary inspection spaces and a new 11,000-square foot (sf) head house (a structure that allows CBP officers to surveil the entire border crossing). The pedestrian inspection capabilities of the LPOE would be expanded by constructing seven inbound pedestrian booths in a new pedestrian inspection building. The commercial inspection capabilities of the LPOE would be expanded by constructing 18 commercial import lanes, six commercial import lot exit booths, and 16 hazardous materials import dock spaces. While this alternative would meet the Purpose and Need (stated above), it was dismissed from further analysis because it would exceed the GSA's available budget for renovating and improving the Otay Mesa LPOE.



## **AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES**

Chapter 3 of the DEIS describes the current environment for resource areas that may be affected by the Preferred Action (Alternative 1) and the Reduced Build Alternative (Alternative 2), and the potential environmental consequences associated with the alternatives. Resource areas analyzed include land use; utilities and infrastructure; hazardous waste and materials; transportation and traffic; noise; socioeconomics; environmental justice and protection of children; visual resources and aesthetics; cultural resources; geology, seismicity, and soils; air quality and climate change; biological resources; and water resources.

### **Affected Environment**

The affected environment summarizes the current physical, biological, social, and economic environments of the area within and surrounding the Otay Mesa Land Port of Entry (LPOE). For each resource area, the bounds of the area for analysis that could be impacted by the Preferred and Reduced Build Alternatives are defined. The elements or components of the resource area that may be potentially affected are described.

For some resource areas, the geographic area for analysis of the affected environment extends beyond the LPOE to encompass the City of Otay Mesa or San Diego County. However, for many of the resource areas potentially affected by the alternatives, the area of analysis is located within the footprint of the Project site, where most of the Project elements (e.g., proposed Commercial Annex Building [CAB], existing buildings) are located.

### **Environmental Consequences**

The analysis of environmental consequences for each resource area begins by explaining the methodology used to characterize potential impacts, including any assumptions made. The impacts analysis considers how the condition of a resource area would change as a result of implementing each of the alternatives; and describes the types of impacts that would occur (direct, indirect, beneficial, adverse). The types of impacts are defined in the next section. The significance of impacts is assessed using four parameters: magnitude, duration, extent, and likelihood of occurrence; these are described under “Significance Criteria” below.

#### ***Types of Impacts***

The terms “impacts” and “effects” are used interchangeably in this chapter. According to the Council on Environmental Quality’s (CEQ) National Environmental Policy Act (NEPA) Regulations at 40 Code of Federal Regulations (CFR) 1500-1508, direct and indirect effects are defined as:

**Direct effects:** Effects that are caused by the action and occur at the same time and place (1508.8(a)).

**Indirect effects:** Effects that are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable. Indirect effects also include “induced changes” in the human and natural environments (1508.8(b)).

In other words, direct impacts are those that are caused directly by the Preferred or Reduced Build Alternatives, such as excavation to construct a new building under the Preferred Alternative that could cause soil erosion. Indirect impacts are those follow-on effects induced by the initial impact. Loss of soil (soil erosion) could cause adverse impacts on water quality, such as turbidity and stream sedimentation.

Identified impacts may be either adverse or beneficial. The CEQ Guidelines that govern NEPA implementation describe the need for identifying and differentiating between adverse and beneficial impacts, but do not offer a definition of these terms. For the Otay Mesa Environmental Impact Statement (EIS), the following definitions have been used by NEPA analysts:

**Adverse impacts:** Those impacts which, in the judgment of an expert resource area analyst, are regarded by the general population as having a negative and harmful effect on the analyzed resource area. An adverse impact causes a change that moves the resource area away from a desired condition or detracts from its appearance or condition.

**Beneficial impacts:** Those impacts which, in the judgment of an expert resource area analyst, are regarded by the general population as having a positive and supportive effect on the analyzed resource area. A beneficial impact constitutes a positive change in the condition or appearance of the resource area or a change that moves the resource area toward a desired condition.

The adverse impact may be to the natural environment (e.g., decrease in available groundwater) and the beneficial impact may be to the human environment (e.g., economic benefits, such as an increase in jobs). Or the opposite may be true: the adverse impact may be to the human environment and the beneficial impact may be to the natural environment. Or, both adverse and beneficial impacts may occur to a single resource area. Adverse and beneficial impacts from the Preferred and Reduced Build Alternatives are not combined into a single, net impact. Rather, adverse and beneficial impacts are noted and assessed separately because an action may result in a significant adverse impact to a resource area even though there may be an overall beneficial effect (40 CFR 1508.27).

### ***Significance Criteria***

Documentation for projects similar to the Otay Mesa LPOE was reviewed to ascertain the activities associated with modernization and expansion that could potentially cause environmental impacts, and the types of impacts they could cause. This research was supplemented by professional judgment concerning impacts of typical concern for a large construction project.

Criteria were defined as a means of measuring the size of the impact and its significance. A structured framework is required to support conclusions concerning the significance of effects and to systematically integrate individual resource area assessments. For example, construction projects generally require some grading and soil disturbance. These activities have an impact on the soil, and they could also affect air quality (by creating fugitive dust), water quality (through erosion of the bare soil and sediment deposition in the surface water), and terrestrial resources (through the removal of vegetation and wildlife habitat). Using the same criteria to describe the size and significance of impacts for each of these resource areas allows for comparison of the impacts between resource areas and determination of the significance.

The significance of impacts was determined systematically by assessing four parameters of environmental impact: magnitude (how much), duration (how long), extent (sphere of influence), and likelihood of occurrence (probability). Each parameter was divided into the following levels:

#### **Magnitude:**

- Major – Substantial impact or change in a resource area that is easily defined, noticeable and measurable, or exceeds a standard.

- Moderate – Noticeable change in a resource area occurs, but the integrity of the resource area remains intact.
- Minor – Change in a resource area occurs, but no substantial resource area impact results.
- Negligible – The impact is at the lowest levels of detection – barely measurable but with perceptible consequences.
- None – The impact is below the threshold of detection with no perceptible consequences.

**Duration:**

- Permanent – Impact would last indefinitely.
- Long-term – Impact would likely last the lifetime of the Project, or for as long as the Otay Mesa LPOE is in operation.
- Medium-term – Impact would extend past the transition phase, or construction phase, and into the operations phase; eventually merging into the long-term.
- Short-term – Impact would last the duration of the construction phase.
- Temporary – Impact would be continuous and last for a portion of the construction phase.
- Intermittent – Impact would not be constant or continuous but rather recurring or periodic. Intermittent impacts could occur temporarily or in the short-, medium-, or long-term.

**Extent:**

- Large – Impacts would affect the resource area on a county, regional, or state level, extending well past the immediate Project area.
- Medium or localized – Impacts would affect the resource area only in the Project area or its immediate surroundings, and would not extend into the county, region, or state. For example, noise impacts from building construction activities are usually localized as they can be heard from approximately 1,000 feet.
- Small or limited – Impacts would affect the resource area over a portion of the Project area.

**Likelihood:**

- High – The impact is more likely to occur than not, i.e., approximately 50 percent likelihood or higher.
- Medium – The impact has some chance of occurring, but probably below 50 percent likelihood.
- Low – The impact has a non-zero but very small likelihood of occurrence.
- None – The impact has zero probability of occurring.

**COMPARISON OF IMPACTS BY ALTERNATIVE**

Table 2 compares the potential environmental impacts resulting from the alternatives. Potential impacts are summarized for each resource area affected by the alternatives. Chapter 3 of the EIS contains a detailed discussion of these potential impacts by resource area.

**Table 2. Summary Comparison of Impacts by Alternative**

Resource Area	Preferred Alternative (Alternative 1)	Reduced Build Alternative (Alternative 2)	No Action Alternative
Land Use	Long-term, minor to moderate, medium or localized beneficial impacts at the existing LPOE site because suitability of land to support the current use would increase. Long-term, moderate, medium or localized and beneficial impacts at the 10-acre, GSA-owned site. The conversion of the currently vacant 10-acre lot to large, industrial buildings would not significantly change the type or classification of land use from its current state.	Long-term, negligible, small or limited beneficial impact at the existing LPOE site because suitability of land to support the current use would increase but would only be slight. Long-term, moderate, medium or localized and beneficial impacts at the 10-acre, GSA-owned site because the addition of a new building would increase the suitability of land to support the current use.	No beneficial or adverse impacts on land use at the LPOE site. Long-term, moderate, medium or localized, and beneficial impacts at the 10-acre GSA-owned lot.
Utilities and Infrastructure	Construction activities would result in adverse, moderate, short-term impacts with medium extent and high likelihood. Operation of new facilities would result in adverse, minor, long-term impacts to utilities with medium extent and high likelihood. Negligible impacts on utilities at existing facilities.	Refurbishing activities at the existing buildings would have none to negligible impacts to LPOE utility consumption in the short or long term.	Long-term utility consumption at the existing LPOE would be higher than under the Preferred Alternative or Reduced Build Alternative. However, the impacts would still be negligible because utility usage would be similar to current levels.
Hazardous Waste and Materials	Low likelihood of hazardous material contamination as a result of construction activities. However, hazardous materials would also be removed during construction which could result in worker or environmental contamination.	Impacts from construction would be less than under the Preferred Alternative and would be low likelihood, limited, intermittent, negligible and adverse. Negative impacts due to ongoing operations would be the same as the Preferred	No impacts from construction would be expected. Because no new property would be acquired and no changes to current land use or zoning are anticipated, no impacts differing from baseline conditions would occur. Ongoing

Resource Area	Preferred Alternative (Alternative 1)	Reduced Build Alternative (Alternative 2)	No Action Alternative
	<p>Construction impacts would be short-term, medium, and adverse with a low likelihood and small extent. Removing asbestos-containing materials (ACMs) and lead-containing surfaces (LCSs) during construction would have high likelihood of long-term, moderate beneficial impacts with medium extent. Long-term impacts would be minor and adverse with limited extent and low likelihood due to small spills of hazardous materials that could over time seep through cracks in the concrete and contaminate the soil beneath. Continued use of polychlorinated biphenyls (PCBs) would have a low likelihood of limited, long-term, minor adverse impacts. If PCBs are removed, there would be a high likelihood of medium, long-term, moderate beneficial impacts.</p>	<p>Alternative - low likelihood of limited, long-term, minor adverse impacts. If contaminated soils are not removed there would not be any beneficial impacts.</p>	<p>impacts would be similar to those resulting from current operations, consistent with existing hazardous material use and disposal practices.</p>
Transportation and Traffic	<p>Construction and demolition activities would have short-term, minor, adverse impacts with medium extent and high likelihood due to shipments of construction materials and waste to and from the construction site and construction worker commutes. Operation of the LPOE would have</p>	<p>Construction and demolition activities would have the same impacts as under the Preferred Alternative; however, due to the reduced amount of construction and demolition required under this alternative, the impacts to local roadways would be lower. Operation of the LPOE would have beneficial</p>	<p>Short-term, adverse, negligible impacts to transportation and traffic with a small extent and high likelihood during construction of the new USDA building. Once construction is completed, traffic would return to its historical levels, and there would be no long-term impacts</p>

Resource Area	Preferred Alternative (Alternative 1)	Reduced Build Alternative (Alternative 2)	No Action Alternative
	a long-term, beneficial, major impact with medium extent and high likelihood because commercial vehicle queue time at the LPOE would be reduced and commercial vehicles would be able to pass through the LPOE at a faster rate.	and moderate with medium extent and high likelihood impacts as reduction in wait times of commercial trucks would be less than under the Preferred Alternative.	associated with the new USDA building. Due to expected population growth and corresponding increase in vehicles on roadways in the region, impacts to transportation and traffic would be long-term, minor, and adverse with a medium extent and high likelihood.
Noise	Short- and long-term, minor, medium extent adverse impacts would be expected with a high likelihood of occurrence. Short-term effects would be mainly from heavy equipment noise during construction, while long-term effects would be due to increased noise from the increased vehicle capacity passing through the upgraded LPOE.	Impacts would be the same as under the Preferred Alternative, though noise levels and duration overall would be reduced in magnitude compared to the Preferred Alternative.	Noise levels would remain similar to current conditions at the LPOE.
Socioeconomics	Overall short-term, negligible to minor, medium to large extent adverse impacts would be expected with a high likelihood of occurrence. Short-term, adverse effects mainly include delays in shipments or deliveries as it relates to trade as well as increased noise and air emissions around the LPOE. Short-term, minor, large extent beneficial impacts with a high likelihood of occurrence would be	The types of impacts would be the same as under the Preferred Alternative, though both adverse and beneficial impacts would be reduced in magnitude.	Long-term, minor, large extent adverse impacts would be expected with a high likelihood of occurrence. San Diego County would continue to grow but the capacity and efficiency at the Otay Mesa LPOE would not increase, adversely affecting businesses in the economic zones as well as the entire county and indirectly in the state.

Resource Area	Preferred Alternative (Alternative 1)	Reduced Build Alternative (Alternative 2)	No Action Alternative
	<p>expected due to the creation of jobs. Long-term, negligible to minor, large extent adverse impacts would be expected with a high likelihood of occurrence. Adverse effects on population and housing would occur if additional personnel are hired to operate the Otay Mesa LPOE in the long term. Moderate to major, beneficial impacts on trade would be expected due to increased efficiency at the LPOE in the long term. The extent would be large with a high likelihood of occurrence.</p>		
<p>Environmental Justice and Protection of Children</p>	<p>Overall short- and long-term, negligible to minor, medium extent adverse impacts would be expected with a high likelihood of occurrence. Short-term, direct, disproportionate impacts on minority populations would occur due to increased congestion around the LPOE; and indirect impacts on children could occur due to increased air emissions. Short-term economic and health impacts could disproportionately benefit minority populations in search of a job; long-term benefits would be negligible. Direct and</p>	<p>The types of impacts would be the same as under the Preferred Alternative, though both adverse and beneficial impacts would be reduced in magnitude.</p>	<p>No disproportionate, adverse or beneficial effects to minority or youth populations are anticipated in the short or long term. Adverse and beneficial impacts described under the Preferred Alternative and Reduced Build Alternative would not occur under the No Action Alternative.</p>

Resource Area	Preferred Alternative (Alternative 1)	Reduced Build Alternative (Alternative 2)	No Action Alternative
	indirect, minor, large extent beneficial impacts would be expected with a high likelihood of occurrence.		
Visual Resources and Aesthetics	Short-term adverse impacts from construction activity would be moderate and localized due to the presence of construction materials, temporary holding cells, heavy equipment and construction vehicles. High likelihood of long-term, localized and moderate impacts based on the level and type of change that would occur; impacts may be considered beneficial or adverse depending on the perception of the viewer. High likelihood, localized, moderate and beneficial impacts as a result of renovation of existing facilities and infrastructure.	High likelihood of adverse, negligible, localized short-term impacts to the visual quality and character of the Project area as a result of construction, though impacts may be slightly reduced in magnitude as compared to the Preferred Alternative. Long-term impacts would be the same as under the Preferred Alternative. Beneficial impacts from renovations would be the same as under the Preferred Alternative.	Construction of the USDA Plant Inspection Station would be highly likely to create long-term, moderate, and localized impacts to visual resources and aesthetics.
Cultural Resources	<u>Archeological Resources:</u> If archaeological resources are discovered (the likelihood is anticipated to be low), impacts would be minor, permanent, small or limited in extent, and could be considered either adverse (if the resource were destroyed) or beneficial (if the resource was perceived as having value to the public).	Impacts would be the same as for the Preferred Alternative. There is a high likelihood that there would be no impacts to either archaeological or historic resources over both the short-term and the long-term.	Impacts would be the same as for the Preferred Alternative. There is a high likelihood that there would be no impacts to either archaeological or historic resources over both the short-term and the long-term.



Resource Area	Preferred Alternative (Alternative 1)	Reduced Build Alternative (Alternative 2)	No Action Alternative
	<u>Historic Resources</u> : High likelihood of no impacts		
Geology, Seismicity and Soils	No impacts on geology or geologic hazards. Negligible, small extent, long-term adverse impacts on topography with a high likelihood of occurrence due to grading of the site. Adverse, long-term to permanent, minor to moderate impacts of medium extent with a high likelihood of occurrence from construction where soils are substantially altered or covered by impervious surfaces. Short-term, negligible to minor, limited adverse impacts with a high likelihood of occurrence where soils are disturbed by vehicle or foot traffic. Beneficial, long-term, minor, limited, impacts with a high likelihood of occurrence on soils that are revegetated and re-stabilized and soil erosion is reduced. There would not be any additional impacts on soils during operation of the LPOE.	No impacts on geology or geologic hazards. Impacts on soils and topography would be the same as under the Preferred Alternative.	No impacts on geology, topography, or geologic hazards. Impacts to soils from construction of the USDA Plant Inspection Station would be similar to those under the Preferred Alternative for the 10-acre lot.
Air Quality and Greenhouse Gas Emissions	Construction/demolition activities would cause short-term, minor adverse impacts with a medium extent and high likelihood on air quality and could affect individuals in close proximity to the LPOE.	Short-term impacts during construction would be the same as under the Preferred Alternative. Due to the reduced amount of construction required under this alternative, annual emissions of	Long-term, minor, and adverse impacts with a medium extent and high likelihood as only the USDA building would be constructed and the average queue times for commercial

Resource Area	Preferred Alternative (Alternative 1)	Reduced Build Alternative (Alternative 2)	No Action Alternative
	<p>Operations would result in long-term, moderate, beneficial impacts with a medium extent and high likelihood due to emissions reduction from the reduced vehicle idle time. Greenhouse gas (GHG) emissions produced during construction and demolition activities would have short term incremental, but overall negligible, contribution to climate change. Long-term, minor, beneficial effects with a medium extent and high likelihood due to reductions in GHG emissions from vehicles in queue during operations.</p>	<p>criteria pollutants would be lower than the emissions estimated for the Preferred Alternative. Long-term, minor, adverse impacts with medium extent and high likelihood would occur during operation because the improvements to the commercial inspection lanes would not occur and the queue time (i.e., vehicle idle time) would continue to increase. Short-term GHG emissions impacts during construction would be similar to the Preferred Alternative during construction but lower. Long-term, minor, adverse effects with medium extent and high likelihood as a reduction in GHG emissions would not occur.</p>	<p>vehicles would be expected to increase over time, resulting in increased criteria pollutant and GHG emissions.</p>
Biological Resources	<p><u>Vegetation:</u> Construction would have adverse short- and long-term, minor, medium extent impacts on vegetation with a high likelihood of occurrence due to loss and disturbance of vegetation in the Project area. Impacts during operation would be beneficial, long-term, negligible, small and with a high likelihood of occurrence due to revegetation of disturbed areas with native plant species.</p> <p><u>Wildlife and Migratory Birds:</u> Construction would have adverse</p>	<p>Impacts on vegetation, wildlife, migratory birds, and threatened and endangered species would be the same as under the Preferred Alternative.</p>	<p>No impacts on biological resources other than from construction of the USDA Plant Inspection Station, which would be the same as the Preferred Alternative for the 10-acre lot but on fewer acres.</p>

Resource Area	Preferred Alternative (Alternative 1)	Reduced Build Alternative (Alternative 2)	No Action Alternative
	<p>short- and long-term, minor to moderate, medium to large extent impacts on wildlife with a high likelihood of occurrence due to disturbance of animals and loss of habitat in the Project area. Impacts during operation would be adverse, long-term, negligible, medium extent with a high likelihood of occurrence due increased noise and disturbance from a higher volume of vehicles and pedestrians passing through the upgraded LPOE.</p> <p><u>Threatened and Endangered Species:</u> No impacts on Federally listed species or critical habitat. Adverse impacts to special status species could be minimized or completely avoided if surveys detect any species and resource closures and mitigation is implemented. If any impacts occur, they would be similar to those for general wildlife.</p>		
Water Resources	Adverse, minor, short-term, localized and low likelihood impacts from storm events greater than the 95 <sup>th</sup> percentile rainfall event due to storm water runoff.	Impacts would be similar to the Preferred Alternative.	Impacts would be similar to the Preferred Alternative.

## REFERENCES

(GSA, 2013). General Services Administration. 2013. Otay Mesa Land Port of Entry Fact Sheet: Reconfiguration and Modernization of the Existing Port of Entry. June.

(GSA, 2017a). General Services Administration. 2017. PBS-100 Facilities Standards for the Public Buildings Service. April 2017.

(Caltrans/SANDAG, 2017a). California Department of Transportation and San Diego Association of Governments. 2017. SR 11/Otay Mesa East Port of Entry: Presidential Permit Application Renewal. Accessed July 19, 2018 at: <https://www.state.gov/documents/organization/276280.pdf>.