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DRAFT ENVIRONMENTAL ASSESSMENT

San Luis I US Land Port of Entry Pedestrian Processing
San Luis, Arizona

March 2016

Prepared by:



San Luis I Land US Port of Entry
Environmental Assessment

United States General Services Administration

Draft Environmental Assessment
San Luis, Arizona

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The US General Services Administration proposes to construct a new pedestrian processing facility at the San Luis I Land U.S. Port of Entry, which is a full-service border station used for the inspection of privately owned vehicles and pedestrians entering and leaving the US.

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List of Acronyms and Abbreviations

ADEQ	Arizona Department of Environmental Quality
ADOT	Arizona Department of Transportation
AMC	Arizona-Mexico Commission
APNPL	Arizona Protected Native Plant Law
CAA	Clean Air Act
CANAMEX	Canada to Mexico Trade Corridor
CBP	Customs and Border Protection
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CLOMR	Conditional Letter of Map Revision
Corps	US Army Corps of Engineers
dB	Decibel
dBA	A-weighted decibel
EA	Environmental Assessment
EB	eastbound
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FBFM	Flood Boundary and Floodway Map
FDA	Food and Drug Administration
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
GSA	US General Services Administration
GHG	Greenhouse gas
I	Interstate
ICE	Immigration and Customs Enforcement
LEED	Leadership in Energy & Environmental Design
Leq	Steady state sound level
LLNB	Lesser long-nosed bat

LOMR	Letter of Map Revision
LPOE	Land Port of Entry
LUSTs	Leaking Underground Storage Tanks
MBTA	Migratory Bird Treaty Act
MP	Milepost
mph	Miles per hour
MVD	Motor Vehicle Department
NAAQS	National Ambient Air Quality Standards
NAC	Noise Abatement Criteria
NAP	Noise Abatement Policy
NB	northbound
NEPA	National Environmental Policy Act
NESHAP	National Emission Standard for Hazardous Air Pollutants
NII	Non-Intrusive Inspection
NO ₂	Nitrogen Dioxide
PCN	Preconstruction Notice
PDS	Program Development Study
PM	Particulate Matter
POE	US Port of entry
POV	Privately-Owned Vehicle
RACM	Regulated Asbestos Containing Material
SB	southbound
SENTRI	Secure Electronic Network for Travelers Rapid Inspection
SIP	State Implementation Plan
SR	State Route
SRL	soil remediation level
US	United States
USDA	US Department of Agriculture
USFWS	US Fish and Wildlife Service
USTs	Underground Storage Tanks
VACIS	Vehicle and Cargo Inspection System

Waters
WB

Waters of the US
westbound

Best Management Practices

The following mitigation measures and commitments are not subject to change or modification without the prior written approval of the United States General Services Administration:

- Construction dust emissions would be controlled according to local regulations including Yuma County suggested BMP's. The following additional measures will be employed when and where feasible to reduce construction impacts on air quality:
 - Use of construction vehicles powered by alternative fuels
 - Limiting idle time of construction vehicles to less than five minutes
 - Utilizing construction equipment with EPA Tier 4 emissions equipment
 - Providing information to contractors on ways to reduce emissions
- Since the Proposed Action would involve demolition of existing structures, an Asbestos Hazard Emergency Response Act certified inspector would inspect all structures to be demolished. If Regulated Asbestos Containing Material is present in the structures, a work plan would be developed to remove, transport, and dispose of these materials.
- At least 10 days prior to demolition of any structure the Arizona Department of Environmental Quality National Emission Standard Hazardous Air Pollutant coordinator would be provided with a National Emission Standard Hazardous Air Pollutant notification form for each structure to be demolished.

1.0 Introduction

1.1 Executive Summary

This Environmental Assessment (EA) has been prepared to meet the requirements of the National Environmental Policy Act (NEPA). The United States (US) General Services Administration (GSA) will use the EA to evaluate the potential social, economic, and environmental impacts for the reconstruction of the San Luis I US Land Port of Entry (LPOE).

The need for this action springs from a 2012 on-site programming session that identified facility deficiencies in the pedestrian processing area and in the detention processing areas. The current pedestrian facility was built in 1982 and cannot accommodate the current volume, security and technology needs of the U.S. Customs and Border Protection. The typical wait time to complete processing is 10 minutes with all seven (7) lanes open; however, during the busy weekday morning hours, pedestrians have been known to wait up to 2 hours. Vehicular traffic congestion was addressed in 2010, when a commercial vehicle facility (San Luis II Port of Entry) was built 5 miles east of the LPOE.

1.2 Location

The LPOE is located at the US/Mexico border approximately 17 miles southwest of the City of Yuma within the City of San Luis, Yuma County, Arizona (Figure 1). It connects the US Highway 95 (US 95) on the north and the Mexican Federal Highway 2 as well as Sonora State Highway 40 on the south (Figure 2). US 95 connects to the US Interstate Highway System via Interstate (I-) 8 in the City of Yuma. The LPOE is the furthest west Arizona port near the California border (approximately 4 miles) and is a primary crossing location for farmworkers transported to agricultural fields daily across Yuma County.

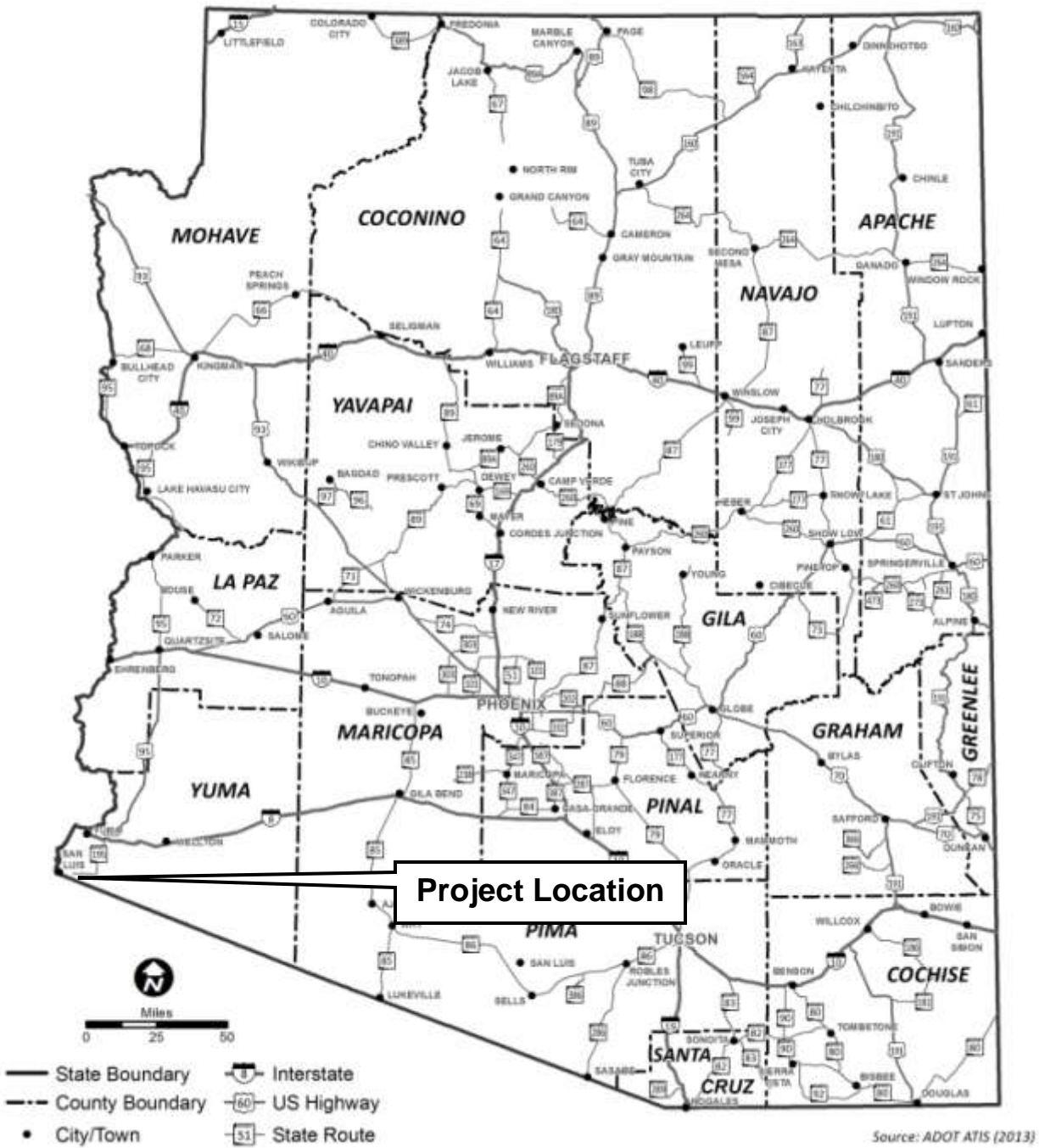


Figure 1. State Location Map



Legend

 Target Property



Feet

0 100 200 400

Figure 2. Project Vicinity Map

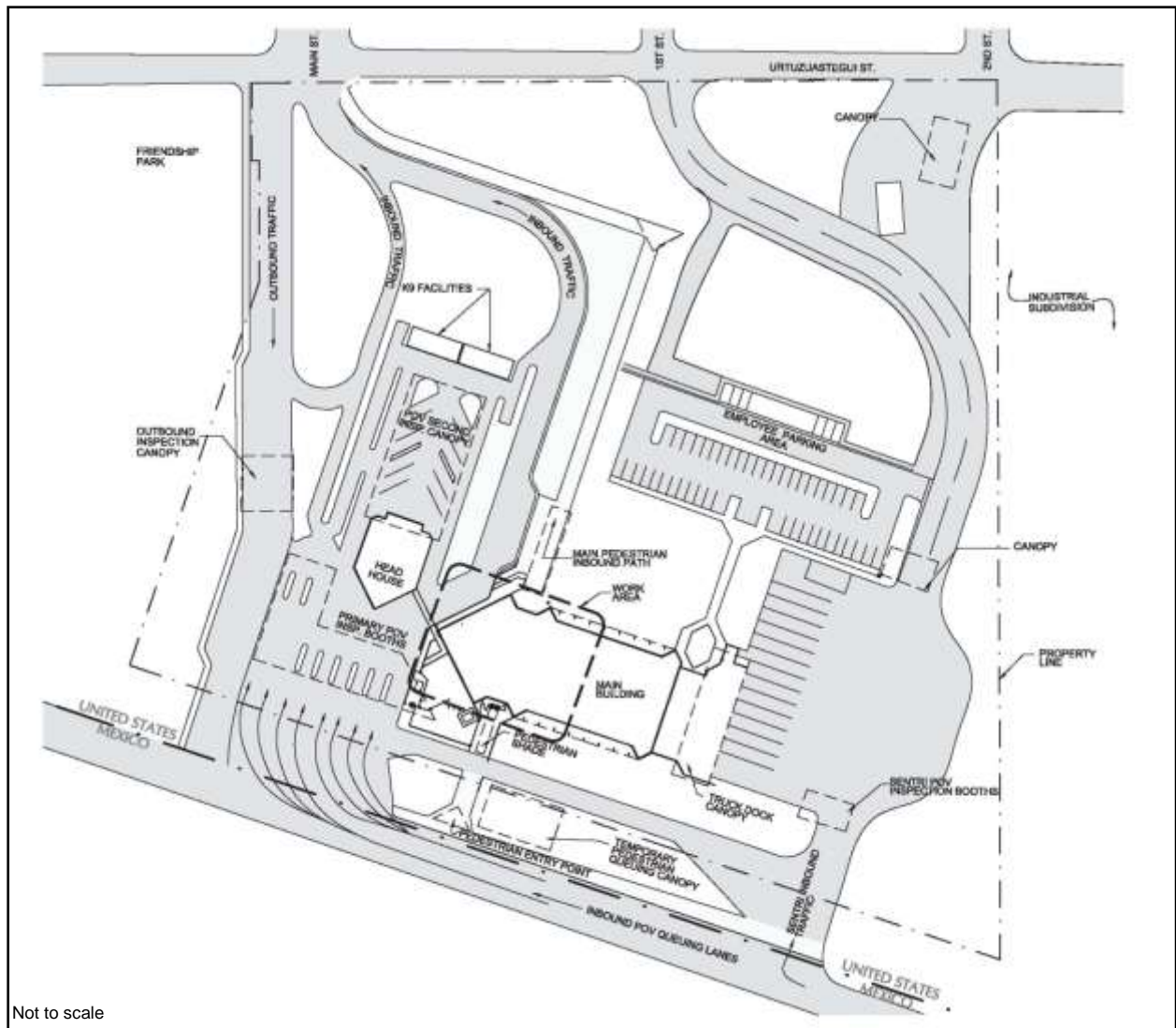
1.3 Background and Overview

This existing LPOE was originally established in 1928 to provide trade access between Mexico and the US. Since the facility's original construction in 1982, the LPOE has undergone several updates and renovations were completed in 1991 and 2002. The facility was originally constructed as a multimodal LPOE for commercial and non-commercial crossing. In 2009, a commercial only facility was constructed 5 miles to the east, the San Luis II LPOE. The LPOE has become primarily for privately owned vehicles (POV), pedestrians, and Secure Electronic Network for Travelers Rapid Inspection (SENTRI) users (Figure 3). In 2011, the POV inspection area received a two-lane expansion with ready-lane kiosks and new digital displays and x-ray scanners for each lane; which improved the port's POV inspection area, allowing for more efficient processing, reduced wait times, and increased security (GSA, 2013).

The current pedestrian processing facility area is located within the western area of the main building (see Appendix A). A recent remodeling created seven (7) processing lanes and retained the two queuing areas. The main queuing area is located outside the facility with a portion of it shaded (see Photograph 1). The rest of the main building contains administrative facilities, offices, and other facility rooms.



Photograph 1. Outside Queuing Area



Not to scale

(GSA 2013)

Figure 3. Existing Site Plan

1.4 Explanation of an Environmental Assessment

This EA is being prepared to comply with the National Environmental Policy Act of 1969 (NEPA) and the policies of the GSA, as the lead federal agency. The EA process provides steps and procedures to evaluate the potential social, economic, and environmental impacts of a Proposed Action while providing an opportunity for public and local, state, or other federal agencies to provide input and/or comment through scoping, public information meetings, and/or a public hearing. These social, economic, and environmental considerations are evaluated and measured, as defined in the Council on Environmental Quality’s (CEQ) regulations, by their magnitude of impacts. In addition, the EA also provides GSA a detailed analysis to examine and

consider the environmental conditions of any sensitive social, economic, and environmental resource and assist in their decision-making process.

2.0 Project Purpose and Need

2.1 Purpose of the Project

The purpose of this project is to improve the pedestrian processing pace and reduce wait times for cross-border travelers entering the US in a safe manner consistent with security measures in place by agencies operating the LPOE. The improvements will allow the agencies that utilize this facility to safely and efficiently carry out their missions to protect Americans and facilitate the trade and flow of commerce between the United States and Mexico.

The agencies using this LPOE include:

- US Customs and Border Protection (CBP)
- US Immigration and Customs Enforcement/Detention and Removal Operations (ICE/DRO)
- GSA

Specific goals of this project include the development of a pedestrian processing facility that would:

- Reduce wait times during the peak travel times
- Achieve adequate capacity to handle traffic through 2025 and allow for future capacity expansion
- Accommodate the safe inspection of pedestrian traffic separate from vehicle processing
- Minimize impacts to the natural environment, including vegetation, water resources such as washes, and floodplains

2.2 Need of the Project

The need for this action springs from a 2012 on-site programming session that identified facility deficiencies in the pedestrian processing area and in the detention processing areas. A larger, more efficient pedestrian facility is needed to expedite trade, tourism, and local jobs while meeting the security needs of the US.

Since 2010 an average of approximately 2.7 million pedestrians per year have used the LPOE, which closely matches the POV use of approximately 2.9 million (see Table 1). Even though the pedestrian crossing numbers have declined within the last three years, there are still a large number of farmworkers crossing the border during the agricultural season. Per an April 2015 article in the *Bajo El Sol*, a pedestrian crossing may take up to 2.5 hours in the morning to pass through the pedestrian lanes entering the US while only 25 minutes to cross back into Mexico in the afternoon/night (Neyoy 2015).

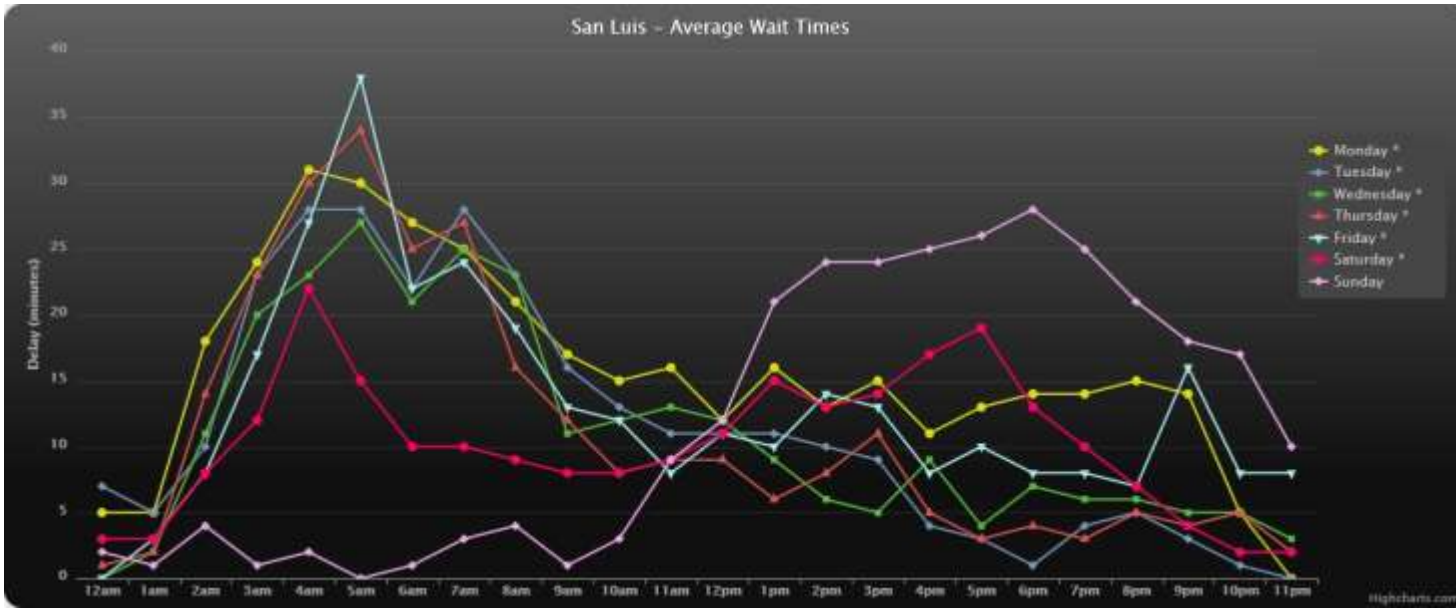
Table 1 Incoming Pedestrian and POV Statics

Traffic	2010	2011	2012	2013	2014	2015*
Pedestrian	2,440,158	2,762,696	2,497,321	2,315,369	2,287,955	1,177,636
POV	2,033,185	2,171,396	2,689,727	2,948,504	3,028,042	1,584,003

*Data only from January to June 2015

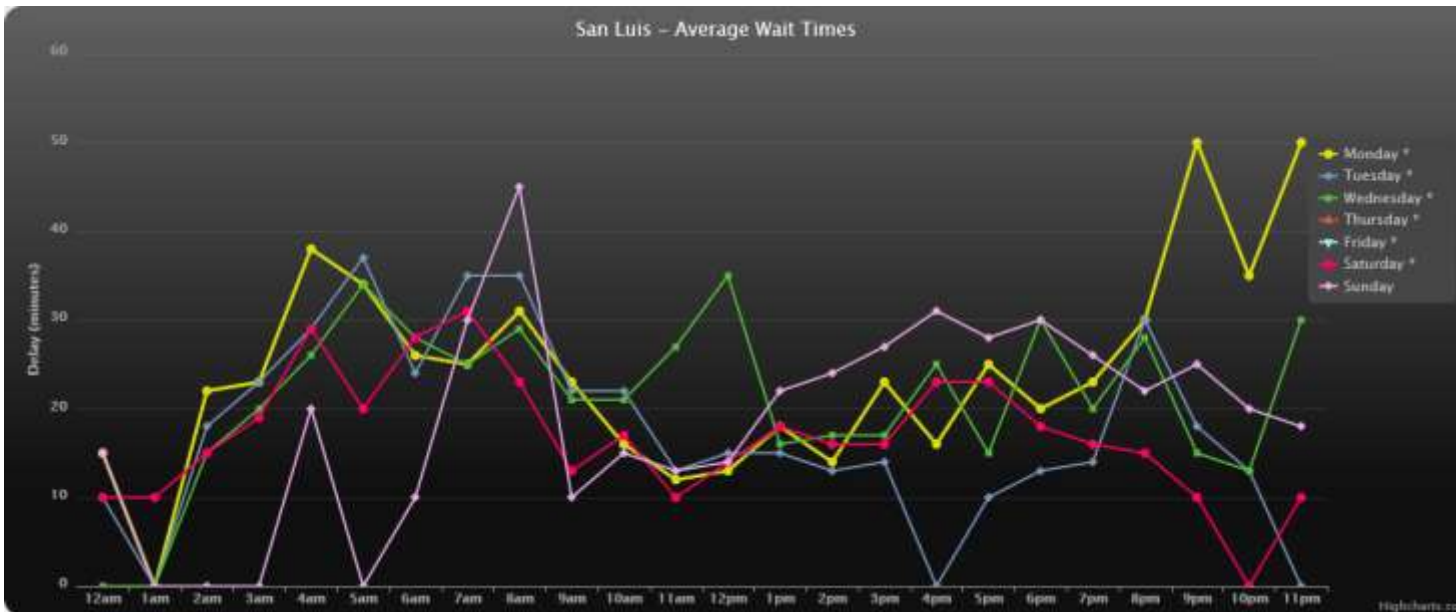
Source: U.S. Department of Transportation 2016

According to data obtained from the online resource *Best Time to Cross the Border*, the longest wait periods are in the early morning hours between 3:00 am and 6:00 am (see Figures 4 and 5) with 45 minutes a common wait time (Calit2 Media Relations 2012). The typical wait time to complete processing is 10 minutes with all seven (7) lanes open; however, during the busy weekday morning hour's pedestrians have reported waiting as long as 2 hours. These delays are a result of outdated equipment and inefficient pedestrian circulation at the LPOE. The existing facilities are not adequate to support efficient pedestrian crossings now at current levels and will not be able to handle predicted increases in pedestrian crossings as predicted in the future.



(Calit2 Media Relations 2012)

Figure 4. Average Wait Times from October 2015



(Calit2 Media Relations 2012)

Figure 5. Average Wait Times from January 2016

2.3 Conformance with Regulations, Land Use Plans, and Other Plans

During the planning process and development of associated environmental documentation for new construction and renovation projects, the GSA considers all requirements (other than procedural requirements) of zoning laws, design guidelines, and other similar laws of the state and/or local government. This includes, but is not limited to, laws relating to landscaping, open space, building setbacks, maximum height of the building, historic preservation, and aesthetic qualities of a building. The project design team has fully considered such laws and requirements in their planning and design documents, and the GSA design standards meet or exceed these local requirements.

3.0 Alternatives

This section describes the alternatives considered to provide safe and efficient operational improvements to pedestrian crossing facilities. The Preferred Alternative and the No Action Alternative are discussed below. In discussions with GSA and CBP, it was determined that the existing site can be adequately renovated and expanded to handle projected future capacity needs and be further expanded to increase capacity. Discussions of constructing a new pedestrian facility were conducted by the project team in the development of the Realignment and Concept Development Study. The need for an alternative of a separate pedestrian facility at a new location was never established as the duration of time needed to locate, permit, and construct a new, separate facility was undesirable.

3.1 No Action Alternative

The No Action Alternative would leave the existing pedestrian facility “as-is.” This alternative proposes no major improvements to the LPOE. No major capacity increases would be associated with this alternative. Improvements that would occur under this alternative would include maintenance activities and minor operational improvements. This alternative would not meet the purpose of this project and long wait times would continue or worsen. The No Action Alternative is the baseline condition used for comparison to the Proposed Action to determine the magnitude of impacts.

3.2 Preferred Alternative (Proposed Action)

The Preferred Alternative was developed in the 2013 GSA Realignment and Concept Development Study for consideration. The key factors for the study focused on the internal relationships, spatial assignments and people flows for the pedestrian function and secondly for detention facilities (GSA 2013). The idea of a separate but connected structure was an option considered at multiple points through the study. The annex building would be located within the existing LPOE located northwest of the main building within the landscaped area (see Figure 6). A total of 8,252 square feet building addition would contain all primary and secondary inspection spaces as well as detention facilities (see Appendix A) (GSA 2013). The present process space would become a pedestrian queuing/“mall” that would provide a climate-controlled space for northbound visitors out of the weather.

The elements of the Preferred Alternative would include:

- Ten (10) officer processing booths
- Eight (8) kiosks for border-crossers
- Sallyport for secure transfer and transport of detainees
- LED displays
- Two (2) female and two (2) male holding/wet cells
- Four (4) interview/search rooms
- Secondary baggage inspection area
- Secondary soft inspection area
- New public restrooms
- EMT/medical room
- Additional storage and office space
- Removal and replacement of the diesel underground storage tank
- Removal and replacement of the diesel backup generator

The design of the proposed improvements has incorporated the recently completed Arizona Department of Transportation (ADOT) improvements in downtown San Luis, including the pedestrian crossing. This proposed project would not change either the ingress or egress points to

the LPOE. Pedestrians coming into the US from Mexico would, upon leaving the new processing building, utilize the existing sidewalks leading north to Urtuzuastegui Street.

The proposed new structure would be designed and constructed in accordance with the Leadership in Energy & Environmental Design (LEED) green building certification program; however it has not yet been determined if GSA would pursue actual certification of the structure. GSA has a minimum requirement for new construction and substantial renovation of Federally-owned facilities at the LEED Gold level of certification.

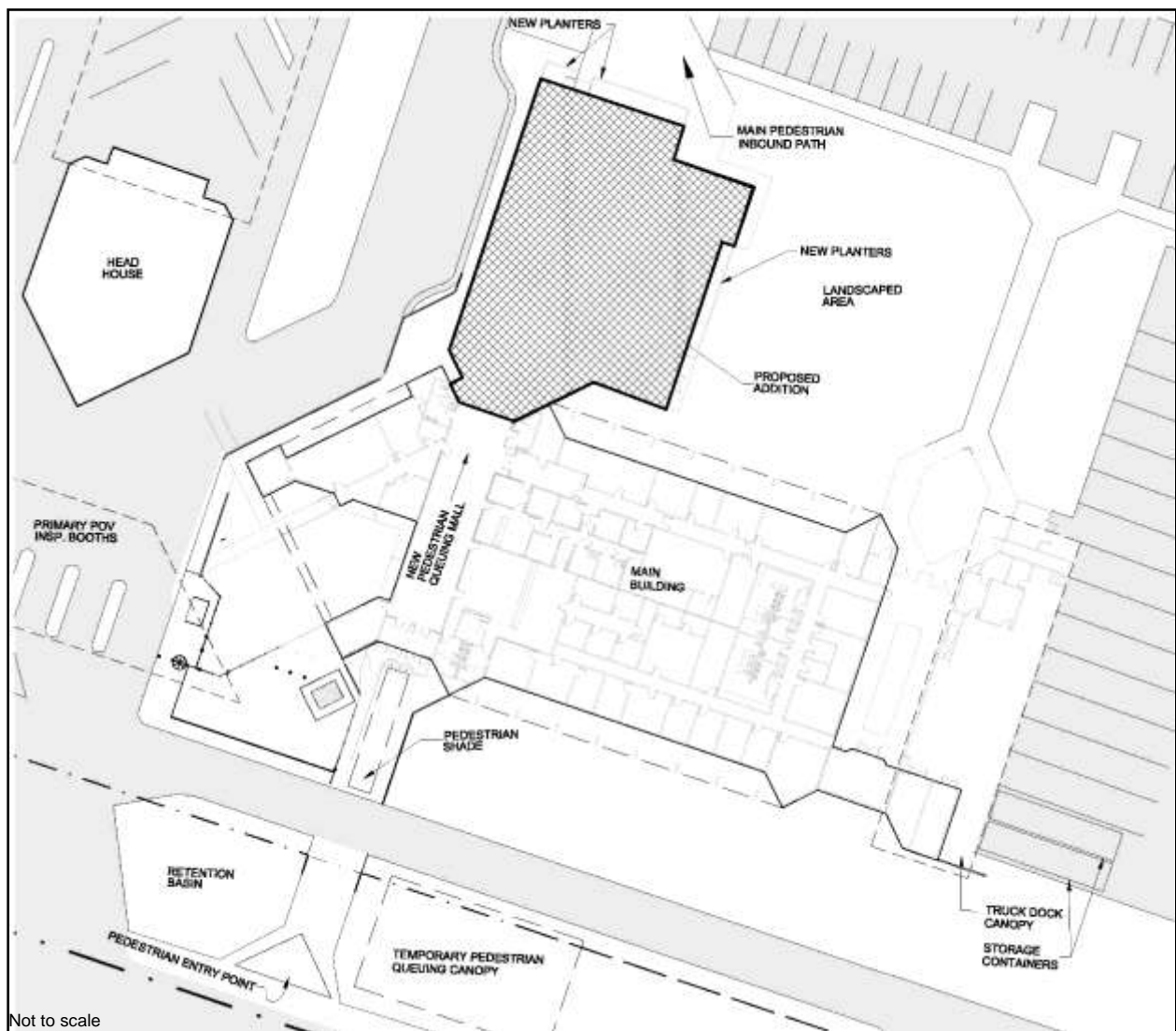


Figure 6. Proposed Site Plan for North Annex Building

4.0 Affected Environmental and Environmental Consequences

4.1 Ownership, Jurisdiction, and Land Use

The LPOE occupies a 12.12 acre property along the US-Mexico Border owned by the US and operated by GSA. The property is comprised of two parcels (775-54-001 & 775-54-002). Properties to the north of the LPOE are occupied by a mixture of commercial structures and parking lots. Properties to the east are occupied by industrial uses. The City operates Friendship Park, on a 5.2 acre parcel owned by the Bureau of Land Management immediately west of the LPOE.

4.1.1 Proposed Action

The proposed project would occur entirely within the existing LPOE and would not require any acquisition of property or easement. The project would not result in a change in the use of the property and would not result in the change of use of any adjacent or nearby properties.

4.1.2 No Action

No effect on land ownership, jurisdiction, or land use would occur as a result of the No Action Alternative.

4.2 Social and Economic Resources

The City of San Luis and Yuma County are experiencing population growth. Between 2000 and 2014, San Luis has almost doubled in population from approximately 15,000 to 28,000. Likewise Yuma County grew from approximately 160,000 to 200,000 over the same time period. (AZDOC, 2016).

4.2.1 Economic Structure

Agriculture, retail and government employment form a large portion of the local economy. Another significant segment is manufacturing. Based on the *Community Profile for San Luis Arizona* published by the Arizona Department of Commerce, agriculture accounts for 20.1% of the employment jobs (AZDOC, 2016).

4.2.2 Title VI/Environmental Justice

Title VI of the Civil Rights Act of 1964 and related statutes assure that individuals are not excluded from participation in, denied the benefit of, or subjected to discrimination under any program or activity receiving federal financial assistance on the basis of race, color, national origin, age, sex, or disability. Executive Order 12898 on environmental justice, dated February 11, 1994, directs that programs, policies, and activities not have a disproportionately high and adverse human health or environmental effect on minority and low-income populations.

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, signed on February 11, 1994, reinforces the provisions set forth from Title VI of the Civil Rights Act of 1964 and provides additional guidance on identifying and addressing disproportionately high or adverse effects on minority and low-income populations as well as disabled individuals, women as head of household, and elderly populations. Specifically, those programs, policies, or benefits should ensure that they prevent discriminatory effects including: discriminating against or excluding individuals or populations from participation, denying benefits of a Proposed Action/activity, or otherwise adversely affecting the human health or environment of these populations.

A minority person can be defined as an individual who is racially classified as African American, Asian American, Native American or Alaskan Native, or anyone who classifies himself or herself as “other” race. Hispanics are also considered minorities regardless of their racial affiliation. Elderly refers to individuals who are older than 60 years of age. Low-income is defined as a person 18 years or older whose income is below the poverty level estimated from the current census. Disabled individuals are persons aged greater than 16 who are non-institutionalized and have a work disability, mobility disability or self-care disability. “Female Head of Household” is a family household where there is a female with no spouse present, regardless of whether she has any children less than 18 years of age and/or living alone or not living alone.

The study area data are compared and contrasted with the data for all of Yuma County and the City of San Luis in order to assess whether minority, elderly, low-income, disabled, or female head of households populations are disproportionately represented in or near the study area.

The demographic composition of the study area was calculated using the *US Department of Commerce, Bureau of the Census 2010-2014 American Community Survey 5-year estimates*. Census tracts are small, relatively permanent statistical subdivisions of a county for tallying census information and do not cross county boundaries. They are delineated with the intention of being maintained over a long period to allow statistical comparisons from census to census. The size of census tracts varies depending on the population density of the area. The study area traverses Census Tract 114.03:

4.2.3 Population Demographics

According to the US Bureau of Census data the study area has a very high population percentage identified as Hispanic, which represents 100 percent of the 4,533 individuals recorded. This percentage is consistent with the census data recorded for the surrounding City of San Luis (95.4%). No other substantial populations, meaning those populations greater than 50 percent of a population, are located within the study area.

Table 2. 2013 Population and Racial Demographics¹

Area	Total Population	White alone		Black or African American alone		American Indian and Alaska Native alone		Asian alone		Native Hawaiian and Other Pacific Islander alone		Some other race alone		Two or more races		Hispanic or Latino	
		#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
Tract 114.03	4,838	4,533	93.7%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	305	6.3%	0	0.0%	4,838	100.0%
San Luis	28,895	27,190	94.1%	289	1.0%	260	0.9%	29	0.1%	0	0.0%	1,098	3.8%	58	0.2%	27,566	95.4%
Yuma County	199,026	152,454	76.6%	4,379	2.2%	2,786	1.4%	2,189	1.1%	398	0.2%	32,043	16.1%	4,976	2.5%	119,615	60.1%

¹All data from S0601

Table 3. Age 60 Years and Over, Below Poverty Level, Disabled, and Female Head of Household Populations¹

Area	Total Population	Age 60 Years and Over		Below Poverty Level		Disabled		Female head of Household	
		#	%	#	%	#	%	#	%
Census Tract 114.03	4,838	822	17.0%	1359	28.1%	391	8.1%	300	22.3%
San Luis	28,895	2,664	9.2%	7999	29.8%	1794	6.7%	1701	21.8%
Yuma county	199,026	41,729	21.0%	38573	20.2%	21291	11.2%	9842	14.0%

¹All data from Summary File 3 (SF3)

4.2.4 Proposed Action

There are no isolated areas within or near to the LPOE that contain populations of the above protected populations that are substantially greater than the overall community. The populations of all border cities/census tracts along the US - Mexico border have high Hispanic proportions, including the City of San Luis and the area surrounding the LPOE.

There would be no residential or business displacements as a result of the implementation of the proposed project. The proposed improvements would not restrict access to any existing public or community services, businesses, commercial areas or employment centers. There may be a short-term, localized affect in the immediate area adjacent to the project during construction; however, these affects would only be temporary and would not be selectively limited to minority and low-income communities, but would potentially affect all residential and business communities located in the immediate areas adjacent to the project. Other short-term, localized effects such as noise levels (e.g. generated by construction equipment and activities) may increase in the immediate area during construction; however, these effects would be temporary.

The proposed project area includes minority populations; however, the project would not result in disproportionate adverse impact as the project would provide more beneficial impacts than negative. It is foreseeable that the proposed project would be a temporary boom to the local economy as spending would have a ripple effect on other local businesses that supply goods to the project and their workers. Therefore, there would be no significant impacts to protected populations as a result of the Proposed Action.

Because of the high percentage of Hispanic residents, all notifications used in the Public Involvement process will be published in both English and Spanish. Additionally a translator will be present at the public hearing. All signage within the future LPOE would be in both English and Spanish. A majority of CBP employees at the LPOE are bilingual.

4.2.5 No Action

The No Action Alternative would have no direct impact on any protected minority or Title VI population. Long queue lengths at the LPOE would impact all users of the LPOE including protected populations.

4.3 Transportation

Access to the existing port of entry is provided by U.S. Highway Route 95, a two lane National Highway System route managed by the Arizona Department of Transportation running north through Yuma, where it connects with Interstate 8, and continuing north to Quartzsite where it connects with Interstate 10. East-west regional access is provided by Mexican Federal Highway 02 which connects with Mexicali, 47 miles to the west, and Sonoyta, 126 miles to the east via a two-lane road. U.S. Highway 95 carries approximately 19,000 vehicles per day on average and is known as Main Street. G Street is a principal east-west roadway on the U.S. side of the border. Upon leaving the San Luis city limits it becomes Juan Sanchez Boulevard eventually turning into the Yuma Area Service Highway (ASH) which leads to I-8 at Araby Road.

Public transportation is provided by the Yuma County Intergovernmental Public Transportation Authority (YCAT). The Yellow Route 95 runs buses along Urtuzuastegui Street and around the downtown area of San Luis. It also runs north along US 95 to provide connectivity to Yuma and Winter Haven. The Yuma Metropolitan Planning Organization (YMPO) is currently conducting a circulator route study in San Luis, AZ to maximize service to the most transit riders. GSA will continue to coordinate with local agencies to ensure that all potential future projects are considered.

There are several client-oriented transportation providers serving San Luis. They include:

- Saguaro Transportation Services – part of the Saguaro Foundation serving their clients as well as having contracts with the Arizona Department of Economic Security (DES), including Vocational Rehabilitation, Family Services, Developmental Disabilities; Arizona Health Cost Containment System (AHCCCS) for Medicaid transportation; the

United Way; and the Arizona Department of Corrections for transportation for prison visitors.

- City of San Luis - The City provides subsidized transportation services for seniors in the San Luis area.
- The EXCEL Group - The EXCEL Group provides transportation based on medical necessity for the elderly and disabled adult customers
- Catholic Community Services in Western Arizona (CCSWA) - CCSWA is a non-profit organization that has provided Yuma County residents with a variety of transportation services.
- The Regional Center for Border Health, Inc. (RCBH) offers medical transportation services to residents of Yuma County.
- Yuma WORC Center The Yuma WORC (Work, Opportunity, Responsibility, and Confidence) Center, Inc. is a nonprofit agency that has been servicing the needs of individuals with disabilities within the Yuma Community
- Comité de Bien Estar (Comite) – Comité operates a public transportation service to meet the transportation needs of specific subsets of their membership.

Other transportation modes that are important for pedestrians using the LPOE include farms within Yuma County that operate private buses which pickup and drop-off farmworkers from Downtown San Luis as well as taxi services which operate from the exit of the LPOE.

4.3.1 Proposed Action

The project has been designed in coordination with other transportation projects that have been constructed in the area. Existing paths for pedestrians including the recently constructed High-Intensity Activated Crosswalk (HAWK) beacon will continue to be used by pedestrians exiting the new processing building.

4.3.2 No Action

The No Action Alternative would have no direct impact on the transportation system.

4.4 Biological Resources

The biological resources study area consists of approximately 0.50 acre of undeveloped area at the existing LPOE facility where the new pedestrian processing facility is proposed. Biological resources information was collected during a site investigation on September 24, 2015, where photographs were taken and vegetation was noted. Additional background information on the project area was obtained from aerial photographs, topographic maps, Geographic Information System data and various natural history and biological texts, unpublished technical documents, Federal Register documents and state and federal agency coordination and websites. Upon review of the available data, the likelihood for special status species occurrence was assessed based on habitat characteristics.

4.4.1 Vegetation

Vegetation in the project area consists entirely of landscaping ornamentals. No wild-growing native vegetation is present. Species within the project footprint include a ground cover of various grasses, groomed shrubs such as oleander, bougainvillea, and boxwood, and a few trees including bottle, sissoo, and citrus trees.

4.4.1.1 *Proposed Action*

The proposed action would result in the removal of up to 10 trees, several shrubs and up to 0.54 acre of ground cover. All vegetation that would be impacted consists of landscape species. No wild-growing native vegetation would be impacted by the proposed action. Upon project completion, undeveloped areas will be revegetated with landscape plants similar to those removed.

4.4.1.2 *No action*

The No Action Alternative would have no impact on vegetation because no ground disturbing activities are associated with this alternative.

4.4.2 Wildlife

No wildlife was observed during the September 24, 2015 site visit, and due to the developed nature of the project limits with high levels of human activity it is likely that only urban-adapted wildlife species utilize the project area. Such species include, but are not limited to: mammals

such as desert cottontail and ground squirrels; reptiles such as Western banded geckos and ornate tree lizards, and birds such as mourning dove, house finches, and various sparrows. No bird nests or signs of nesting activity were observed within the project area during the site visit.

4.4.2.1 Proposed Action

Construction associated with the proposed action could injure or kill small reptiles and mammals if they are present in the project area during these activities. However, species such as ground squirrels or lizards that could be displaced, injured, or killed by construction activities are common and widely distributed; therefore, the proposed action would not appreciably impact the size or future viability of their populations. Furthermore, because the project is non-linear and will have a small footprint of permanent ground disturbance, the proposed action would not alter existing wildlife movement patterns or result in fragmentation of wildlife habitat.

4.4.2.2 No Action

The No Action Alternative would have no impact on wildlife because no ground disturbing activities are associated with this alternative.

4.4.3 Special Status Species

Table 4 is the special status species list for the project area and includes the US Fish and Wildlife Service list of federally threatened, endangered, proposed, candidate, and conservation agreement species potentially occurring within the project vicinity, as well as other special status species identified by the Arizona Game and Fish Department as occurring within 3 miles of the project area. For each species listed in Table 4, a brief assessment of the potential for occurrence in the project area is provided based on the species habitat requirements. No special status species are reasonably expected to occur in the project area and no proposed or designated critical habitats are within or adjacent to the project area.

Table 4. Special Status Species List for Project Area			
Species Name	Status ¹	Habitat Requirements/Range	Possibility of Occurrence in the Project Area
Flat-tailed horned Lizard (<i>Phrynosoma mcallii</i>)	ESA CCA	Sandy flats or areas with fine, wind-blown sand in the creosote-white bursage series of Sonoran Desertscrub generally west of the Gila Mountains and south of Interstate 8 below 1,000 feet.	None. No suitable habitat. No sandy flats, or areas with fine wind-blown sand.
Southwestern willow flycatcher (<i>Empidonax traillii extimus</i>)	ESA LE	Cottonwood/willow and tamarisk vegetation communities along rivers and streams below 8,500 feet	None. No suitable habitat. No riparian vegetation.
Sprague pipit (<i>Anthus spragueii</i>)	ESA C	Native grasslands lacking woody shrubs. No breeding documented in Arizona. Occurs below 5,000 feet.	None. No suitable habitat. No native grasslands.
Yellow-billed cuckoo (<i>Coccyzus americanus</i>)	ESA LT	Large blocks of riparian woodlands (cottonwood, willow, or tamarisk galleries) below 6,500 feet.	None. No suitable habitat. No riparian woodlands.
Yuma clapper rail (<i>Rallus longirostris yumanensis</i>)	ESA LE	Fresh water and brackish marshes, associated with dense emergent riparian vegetation below 4,500 feet.	None. No suitable habitat. No marshes or emergent riparian vegetation
Yuma hispid cotton rat (<i>Sigmodon hispidus eremicus</i>)	SC	Dense grassy, brushy or weedy areas along Colorado River, in irrigated fields and in desert scrub between 120 and 160 feet	Very low. No suitable habitat. No dense grassy, weedy or brushy areas.
Various bird species	MBTA	Various	Present. Most bird species that could occur in the project area are protected under the MBTA
¹ Status Definitions: ESA=Endangered Species Act, LE=Listed Endangered, LT=Listed Threatened, C=Candidate, CCA=Candidate Conservation Agreement. <i>Source:</i> U.S. Fish and Wildlife Service Endangered Species Act Species List. Accessed December 31, 2015 (http://ecos.fws.gov/ipac/). SC=Species of Concern(does not receive protection under the Endangered Species Act). MBTA=Migratory Bird Treaty Act.			

4.4.3.1 Proposed Action

Pursuant to Section 7 of the Endangered Species Act (ESA), GSA, as the lead federal agency, determined that due to a lack of suitable habitat in the project area, the proposed action would have no effect to any species protected under the ESA, and would have no effect to any proposed or designated critical habitats.

Several bird species protected by the Migratory Bird Treaty Act (MBTA) could occur within the project area throughout the year. While no bird nests or sign of nesting activity was observed within the project area during the September 24, 2015 site visit, trees within the area could provide suitable nesting habitat for some species protected by the MBTA. Therefore, the project has the potential to result in “take” of migratory birds if active bird nests are present during construction.

4.4.3.2 *No action*

The No Action Alternative would have no impact on Special Status Species because no ground disturbing activities are associated with this alternative.

4.5 Cultural Resources

Section 106 of the National Historic Preservation Act (NHPA) and NEPA require federal agencies to take into account the effects of their undertakings on historic properties and afford the State Historic Preservation Office (SHPO) and other interested parties the opportunity to comment on such undertakings. To comply with these laws, an assessment of cultural resources was completed for this EA.

Historic properties may be eligible for nomination to the National Register of Historic Places (NRHP) if they possess integrity of location, design, setting, materials, workmanship, feeling, and association, and meet at least one of the following criteria:

- Criterion A – be associated with events that have made a significant contribution to the broad patterns of our history
- Criterion B – be associated with the lives of persons significant in our past
- Criterion C – embody the distinctive characteristics of a type, period, or method of construction; or represent the work of a master; or possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction
- Criterion D – have yielded, or may be likely to yield, information important in prehistory or history

4.5.1 Cultural History

In 1903, the Yuma County Water Users' Association was founded for the purpose of developing and irrigating the low-lying lands of Yuma Valley. The Yuma Project, authorized in 1904, was developed to provide irrigation water for lands near the Arizona towns of Yuma, Somerton, and Gadsden. The Yuma Project was ultimately divided into two divisions, the California Reservation Division and the Arizona Valley Division. Original project features included the Boundary Pumping Plant (located west of the current project area) and an extensive system of canals, laterals, and drains (Bureau of Reclamation 2012). In the Arizona Valley Division, the main drain terminates at the Boundary Pumping Plant in proximity to the Mexican border.

The town of San Luis, Arizona, was established in 1928 when a new port of entry (POE) was opened on the U.S./Mexico border (Bureau of Reclamation, 2000). A permanent border-crossing station was at the POE after World War II, but it had only two lanes, which was soon inadequate to handle the growing volume of traffic that was crossing at San Luis. A new POE station with four lanes was completed in 1984.

Cultural resources information was collected during a May 30–31, 2012 cultural survey and historic buildings assessment site visit for the FHWA/ADOT traffic circulation improvement project on US 95. Additional background information on the project area was obtained from research in the AZSITE database and BLM-Yuma Field Office. As a result of the background research and survey/assessment, 10 historic properties with undetermined eligibility or determined to be eligible for inclusion in the NRHP were noted within 1.0 mile of the project area. None of the sites are located within the proposed POE reconstruction area. Information pertaining to each site is outlined in Table 1.

Table 5. Previously Identified Cultural Resources within 1.0 Mile of the Project Area.			
Site Number	Site Description	NRHP Eligibility Recommendation	Reference
AZ L:7:30(ASM)	Historic US 95	Eligible-Criterion D (part of Historic State Highway System)	AZSITE database
AZ X:6:15(ASM)	Historic earthen /concrete levee (Yuma Valley Levee)	Eligible-Criterion A	Hart 2012; Pfaff et al. 1992; Sterner and Bischoff 1997
AZ X:6:39(ASM)	Historic earthen channel (Main Drain)	Eligible-Criterion A	Hart 2012; Pfaff et al. 1992
AZ X:6:65(ASM)	Historic canal (East Main Canal)	Eligible-Criteria A and D	Pfaff et al. 1992; Hart 2012
AZ X:9:2(ASM)	Prehistoric sherd scatter	Undetermined	Hart 2012; Johnson 1982
AZ X:9:5(ASM)	Historic check and culvert off East Main Canal	Eligible-Criteria A and D	Hart 2012; Pfaff et al. 1992
AZ X:9:6(ASM)	Historic boundary pumping plant	Eligible-Criterion A	Hart 2012; Pfaff et al. 1992
AZ X:9:7(ASM)	Historic landfill	Eligible-Criterion D	Hart 2012; Moreno 1998
AZ-050-0079(BLM)	Prehistoric sherd scatter	Undetermined	Hart 2012
Parcel 775-45-005/006	Charles and Frank Building - 534/542 North Main Street (US 95)	Eligible -Criteria A and C	Bowler and Solliday 2012

4.5.2 Proposed Action

Because there are no historic properties within the POE reconstruction area, the project would have no impact on historic properties. Pursuant to Section 106 of the NHPA, GSA consulted with SHPO, the Bureau of Land Management (BLM), the Bureau of Reclamation (Reclamation), GSA, the Cocopah Tribe, the Colorado River Indian Tribes (CRIT), the Fort Mojave Indian Tribe (FMIT), the Fort Yuma-Quechan Tribe (FYQT), and the Hopi Tribe on a project effect finding of " no historic properties affected".

4.5.3 No Action

The No Action Alternative would have no impact on historic properties.

4.6 Air Quality

ADEQ works with the EPA Border Program as part of the U.S. – Mexico Border Air Monitoring Working Group. This working group’s primary priority is reviewing the air quality monitoring data and air monitoring networks in rural and urban areas along the border.

A portion of Yuma County Arizona is designated as a particulate matter maintenance area. ADEQ mapping for nonattainment areas indicates that the project is outside of the Yuma Non-attainment area for PM10 which ends at West County 22nd St, approximately 1.5 miles north of the San Luis LPOE.

4.6.1 Proposed Action

Air quality impacts as a result of the project would be minor; however, replacement of the existing emergency backup diesel generator with a modern unit would reduce the limited emissions that the LPOE produces. Reducing queue times for pedestrians may also have an effect on the amount of time busses and other vehicles are idling while waiting to pick up pedestrians crossing into the US.

Construction-related effects of the project would be limited to short-term increased fugitive dust and mobile-source emissions during construction. Construction dust emissions would be controlled according to local regulations including Yuma County suggested BMP's. The following additional measures will be employed when and where feasible to reduce construction impacts on air quality:

- Use of construction vehicles powered by alternative fuels
- Limiting idle time of construction vehicles to less than five minutes
- Utilizing construction equipment with EPA Tier 4 emissions equipment
- Providing information to contractors on ways to reduce emissions

4.6.2 No Action

The existing diesel generator would remain in place and would not be replaced with a unit with fewer emissions. Long processing times for workers may increase idle times of buses and other vehicles waiting for these workers. These activities are not expected to decrease air quality or result in exceedances of NAAQS.

4.7 Noise Analysis

Noise is considered as the unwanted component of sound. Sound level is measured in decibels (dB). The "A"-weighted sound level (dBA) response is similar to the typical human hearing capability. The steady state sound level (Leq) is the metric unit used to describe the calculated average sound energy level over a measurement period. The urban environment of San Luis Rio

Colorado, Mexico creates common sounds of a city environment and can be heard for more than 1 mile from the LPOE. Sensitive receivers of noise include land uses such as picnic areas, recreation areas, playgrounds, active sports areas, parks, residences, motels, hotels, schools, churches, libraries, and hospitals. The only nearby sensitive receptor is Friendship Park which is located adjacent to the LPOE.

4.7.1 Proposed Action

Project construction would temporarily increase noise levels in the area and construction noise could reach a level of up to 89 dBA at 50 feet from the source. Sensitive receptors are all located outside of this range and would not be impacted by noise. Because this project would not result in increased traffic or other sources of noise, no increase in sound levels would result from the project.

4.7.2 No Action

The No Action Alternative would not change the existing sources or location of noise within the LPOE.

4.8 Water Resources

The project area is relatively flat and is located atop a terrace adjacent to the Colorado River floodplain. In the general vicinity, surface water flows in a westerly direction toward the Colorado River, which is less than 2 miles west of the project area. No natural surface water features are located within or adjacent to the project area, thus no potential jurisdictional waters of the US as regulated by Section 404 of the Clean Water Act are present. The only surface water features within the project area are constructed stormwater management features which include a vegetated detention area that collects stormwater runoff from the LPOE building, parking lots and other impervious surfaces; and a concrete-lined runoff diversion facility which directs stormwater runoff from the inbound traffic lanes to the vegetated detention area. These features are both dry except during rainfall when they act to manage stormwater on-site.

The project area is located within the current Federal Emergency Management Agency (FEMA) designated 500-year floodplain. The 500-year floodplain is a moderate flood hazard area that has a 0.2 percent annual chance of inundation. The Yuma County Flood Control District Floodplain Regulation applies to Special Flood Hazard Areas (SFHA) subject to inundation by 1 percent

annual chance of flood or greater. Therefore, the project area is not subject to Yuma County Floodplain Regulations.

4.8.1 Proposed Action

Due to a lack of potential jurisdictional waters of the US, the proposed action would not require Clean Water Act Section 401 certification or a Clean Water Act Section 404 permit. The proposed action would result in less than 1 acre of ground disturbance, and therefore does not require coverage under an Arizona Pollutant Discharge Elimination System (AZPDES) permit. Although the proposed action does not require the preparation of a Storm Water Pollution Prevention Plan (SWPPP), general construction Best Management Practices (BMPs) will be implemented to ensure pollutants do not reach surface waters. Finally, the proposed action would not change the elevation of the project area and the project area at its current elevation is outside of the SFHA that is regulated by the Yuma County Flood Control District. Thus, the proposed action would not require a floodplain use permit or provisions for flood hazard reduction.

4.8.2 No Action

The No Action Alternative would have no impact on water resources.

4.9 Hazardous Materials

4.9.1 Database Records Review

A Phase I Environmental Site Assessment was completed for the study area in October 2015. The results of the database records review and site visit revealed that a 2,000 gallon diesel underground storage tank is located in the southwest corner of the grass-lined retention area. This fuel is used to run the emergency backup generator for the main building. ADEQ records indicate that the tank had two Leaking Underground Storage Tank (LUST) cases assigned in 2000. Other sites identified in the records review within the vicinity of the LPOE have either been remediated or have no indication that any release has affected the study area.

A review of the LUST case files was conducted at the ADEQ case file library on October 7, 2015. The files indicated that during some upgrade work two leaks in the piping between the tank and the generator were discovered. The soil around each leak was stockpiled and tested for

contamination. The leak nearest the tank did not contaminate the soil above ADEQ Soil Remediation Levels (SRL) and was used as backfill once the pipe was repaired. The leak nearest the generator did have contamination above SRLs of petroleum, ethyl benzene, and xylene. The contaminated soil was removed and transported/disposed of at a landfill facility. Recent pressure testing of the tank and lines indicate that the system is intact and no leaks are suspected.

4.9.2 Asbestos Containing Materials

Pursuant to the CAA of 1970, EPA established the Asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP). It is intended to minimize the release of asbestos fibers during activities involving the handling of asbestos. It specifies work practices to be followed during renovation, demolition, and other abatement activities when friable asbestos is involved. The ADEQ Asbestos NESHAP coordinator has jurisdiction in Yuma County. Prior to beginning renovation or demolition activities of a facility, a certified Asbestos Hazard Emergency Response Act building inspector must thoroughly inspect the facility or part of the facility where the renovation or demolition operation would occur for the presence of asbestos, including friable and non-friable asbestos-containing materials.

For all demolitions (even when no asbestos is present) and renovation activities involving threshold amounts of regulated asbestos-containing material (RACM), the operator will provide the ADEQ with a NESHAP notification at least 10 working days prior to the demolition or renovation activity.

4.9.3 Proposed Action

Because the Proposed Action would involve renovation of an existing structure, an Asbestos Hazard Emergency Response Act-certified inspector would inspect all suspect materials that would be affected. If RACM are present in the structure, a work plan would be developed to remove, transport, and dispose of these materials. At least 10 days prior to demolition of any structure the contractor would provide the ADEQ NESHAP Coordinator with a NESHAP notification form for renovation of the existing structure.

4.9.3.1 No Action

Because it is unknown if RACM are present in the existing structure under the No Action Alternative the presence of RACM may remain a potential hazard.

4.10 Energy Efficiency, Sustainability, and Climate

Executive Order (E.O.) 13514; Federal Leadership in Environmental, Energy, and Economic Performance; was signed on October 5, 2009 and sets numerous Federal energy requirements in several areas, including GHG management, sustainable buildings, water efficiency, and pollution prevention. It expanded upon the energy reduction and environmental performance requirements of E.O. 13423.

GSA is committed to incorporating principles of sustainable design and energy efficiency into all of its building projects. The result is an optimal balance of cost, environmental quality, and socioeconomic benefits that meet the mission and function of the intended facility. It is GSA's intent that sustainable design will be integrated as seamlessly as possible into the existing design and construction process.

Gases that trap heat in the atmosphere are often called greenhouse gases. Carbon dioxide (CO₂) is the most important anthropogenic greenhouse gas and accounts for more than 75 percent of all anthropogenic GHG emissions. Increasing concentrations of CO₂ in the atmosphere are primarily a result of emissions from the burning of fossil fuels, gas flaring, cement production, and land use changes. Other greenhouse gases include methane (CH₄), nitrous oxide (N₂O), and fluorinated gases. Transportation sources accounted for 29 percent of total US GHG emissions in 2006. Ambient concentrations of GHGs do not cause direct adverse health effects (such as respiratory or toxic effects), but public health risks and impacts as a result of elevated atmospheric concentrations of GHGs occur via climate change. The effects of climate change include more frequent and intense heat waves, more severe wildfires, degraded air quality, more heavy downpours and flooding, increased drought, etc.

4.10.1 Proposed Action

As a means of evaluating and measuring green environmental goals, all GSA new construction projects and substantial renovations must be certified through the Leadership in Energy and

Environmental Design (LEED®) Green Building Rating System of the US Green Building Council. GSA has a minimum requirement for new construction and substantial renovation of Federally-owned facilities at the LEED Gold level of certification.

The Council on Environmental Quality (CEQ) issued draft guidance on consideration of the effects of climate change and greenhouse gas emissions in February 2010. Specifically, if a proposed action would be reasonably anticipated to cause direct emissions of 25,000 metric tons or more GHG emissions on an annual basis, agencies should consider this an indicator that a quantitative assessment may be meaningful to decision makers and the public. This project would generate far less GHG emissions than the indicator of 25,000 metric tons.

4.10.2 No Action

The No Action Alternative would have no impact on GHG emissions. Future remodeling or renovation efforts could enhance the efficiency of the existing facility.

4.11 Secondary and Cumulative Effects

Secondary effects are broadly defined by the CEQ as those impacts that are caused by an action and occur later in time, or are farther removed in distance but are still reasonably foreseeable after the action has been completed (40 CFR 1508.8). They comprise a wide variety of secondary effects, such as changes in land use, economic vitality, and population density. Secondary impact issues relevant to this project are discussed below.

Cumulative effects are the combined impacts on the environment that result from the incremental effect of the Proposed Action when added to past, present, and reasonably foreseeable future actions within the immediate vicinity of the project area (40 CFR 1508.7). These impacts are less defined than secondary effects. The cumulative effects of an action may be undetectable when viewed in the context of individual direct or indirect actions but could add to a measurable environmental change. For this assessment, only those at risk critical resources would be evaluated.

4.11.1 Transportation Facility Development

In 2010, the San Luis II LPOE was opened to process commercial vehicles entering the US. Previously, the San Luis LPOE processed commercial vehicles, privately owned vehicles (POV), as well as pedestrians. With the opening of the second LPOE, the San Luis LPOE no longer processes commercial vehicles.

ADOT recently completed two projects to improve traffic and pedestrian mobility through the San Luis LPOE to reduce conflicts between motorists, bicyclists and pedestrians, improve drainage in the project area and enhance and revitalize the business district on Main Street. These projects included the following scope items:

- Constructing two roundabouts: D St at US 95 and Urtuzuastegui St at US 95
- Converting Archibald St (SB) and 1st Ave (NB) to one way streets
- Reconfiguring NB traffic from the LPOE directly to 1st Ave with accessibility to US 95 from the Urtuzuastegui St (EB and WB)
- Converting US 95 from a 5 lane facility between the planned Urtuzuastegui St mini-roundabout and D St roundabout into a two-lane local road
- Constructing a transition road from the F St/US 95 intersection, which is north of the D St roundabout, west to Archibald St
- New construction, reconstruction and widening Archibald St from a two lane street to a three lane one-way SB facility from F Street to Urtuzuastegui St
- Constructing an additional EB lane on Urtuzuastegui St from Archibald St to the LPOE
- Providing amenities on US 95 to accommodate pedestrian and bicycle traffic
- Installing benches, lighting, bicycle racks, and new signage
- Widening sidewalks, and adding cross walks
- Landscaping and installing irrigation

The cumulative effect of the removal of commercial vehicles from San Luis I LPOE, the improvements that ADOT has made to traffic patterns and circulations, and the construction of the new processing facility would all be positive for San Luis. These projects have all been designed and constructed in concert with each other to improve congestion and mobility within San Luis.

4.11.2 Natural Environment

Due to expected growth in Yuma County, development of properties within San Luis is reasonably certain to continue in the future. Development typically involves clearing land of vegetation, which eliminates habitat for general wildlife, some of which may be habitat for special status species. The incremental effect of the Proposed Action when added to past, present, and reasonably foreseeable development in the area would not add to a measurable reduction in habitat for Special Status Species in the project vicinity. Furthermore, some actions on private and state lands may require federal permits (such as a Clean Water Act permit), and thus would be subject to consultation with USFWS pursuant to Section 7 of the federal Endangered Species Act and subsequent avoidance, minimization, and/or mitigation of impacts to threatened or endangered species. In addition, the Arizona Native Plant Law provides some protection for native plants, and would be applicable on some future development projects in the area.

4.11.3 Human Environment

Population growth projections in Yuma County follow a pattern similar to that forecast for the state of Arizona as a whole; that is, the population increases, however the rate of growth decreases each year from the starting year. Growth in the interim is subject to a number of factors, but perhaps most importantly to the capacity of the area to absorb population and employment activities at a rate any faster than what is projected. Current planning and zoning would permit commercial and industrial development in areas surrounding the LPOE. There are currently no approved, pending, or planned developments in the area surrounding the LPOE.

5.0 Public Involvement/Project Coordination

5.1 Agency and Stakeholder Coordination

Coordination letters requesting comments on the project were sent to the following public agencies and organizations:

Table 6. Agency Scoping List

Agency	Position
Arizona State Land Department	Stand Land Commissioner
	Right of Way Manager
Arizona Department of Environmental Quality	Director
Arizona Department of Transportation	Southwest District Engineer
	Southwest District Environmental Coordinator
	Government Relations Specialist
Arizona Game and Fish Department	Transportation Project Evaluation Specialist
Arizona Department of Public Safety	Sergeant of Yuma District Headquarters
Arizona Department of Homeland Security	Border & Tribal Liaison
Arizona State Parks	Executive Director
Arizona-Mexico Commission (AMC)	Executive Director
Federal Highway Administration (FHWA)	Arizona Division A-3 Area Engineer
	Environmental Coordinator
Bureau of Land Management	Yuma Field Manager
Yuma Metropolitan Planning Organization	Executive Director
	Senior Planner Manager
Yuma County	District 4 Supervisor
	County Administrator
	County Engineer/Flood Control Manager
	Community Planning Coordinator
	Environmental Programs Manager
	Public Works Director
	Superintendent of Schools
Sheriff	
Yuma County Intergovernmental Public	Transit Director

Transportation Authority	
City of San Luis	Mayor
	Vice Mayor
	Fire Chief
	Chief of Police
	City Clerk
	Planning Director
	Parks & Recreation Director
	Director of Public Works
	Public Works Supervisor, Streets Division
Gadsen Elementary School District	School Superintendent
Arizona Desert Elementary School	Principal
Rio Colorado Elementary School	Principal
San Luis Middle School	Principal
Water Area Power Administration	Regional Manager
Yuma Irrigation District	Manager
U.S. Customs and Border Patrol	Chief Patrol Agent for Yuma Sector
U.S. Post Office	Postmaster
Center for Biological Diversity	Senior Scientist
Sky Island Alliance	Senior Scientist
Yuma Regional Medical Center	CEO / President
Rural Metro Corporation	Yuma Division General Manager
Yuma County Chamber of Commerce	Executive Director
Yuma County Farm Bureau	Representative for Yuma
U.S. Environmental Protection Agency (EPA)	Environmental Review Section

Responses to the scoping letters were received from the AMC, FHWA, and EPA (attached). Their responses are summarized below:

AMC

- Support for the construction of new pedestrian inspection facilities at LPOE.
- ACM was part of the team for the initial funding for the Design phase of Reconfiguration of the San Luis I POE in 2007.
- Very high volume of pedestrians in the early morning hours, specifically two hour waiting periods between 3:00 AM and 5:00 AM every weekday.

- Suggest installation of pedestrian SENTRI lane(s) along with the kiosks.

FHWA

- Asked if the new facility will still encouraged pedestrians going into Mexico to cross at Archibald St. where a new Pedestrian Hybrid Beacon was installed.
- If pedestrians will be redirected to Urtuzuastegu St. then the Pedestrian Hybrid Beacon may need to moved.

EPA

- Offered scoping comments to assist in the development of the EA pursuant to NEPA, CEQ, and Section 309 of the Clean Air Act.
- Provided detailed comments on seven (7) topics:
 1. Purpose and Need statement that clearly describes volume, security, and technology needs of the CBP at this facility.
 2. Describe any connected actions associated with the LPOE, particularly any other future planned border facilities near San Luis.
 3. Include quantified analysis of pedestrian visitors numbers at LPOE, including historic data and future forecast.
 4. Analyze construction phase impacts to air quality.
 5. Evaluate current employee parking facility and the need to possibly expand.
 6. Describe the current available transit and other ridesharing systems visitors use on the US side of the border, and coordinate with local bus and other transportation agencies.
 7. Discuss whether LEED certification will be sought for the project.
 8. Identify any climate risk and commitments to implement climate adaptation.

5.2 Public Involvement

The following adjacent property owners/businesses were sent scoping letters:

Table 7. Public Scoping List

Property Owner	Contact
Barragan Family Trust	Trust Manager
Sanchez Investment Co.	Property Manager
Myung & Tak AZ LLC	Property Manager
JOFCO Inc.	Property Manager

In addition to the scoping letters, GSA released media information to the public via their website on March 25, 2015, which provided a phone number and e-mail for the public to obtain further information or provide comments. No responses were received for both the letters and public notice.

6.0 Conclusion

The potential environmental impacts of the proposed improvements were evaluated based on both the context of the effects on the project area and the intensity or severity of impacts as defined in CEQ's regulations. Table 8 summarizes the potential environmental impacts of the Proposed Action.

Table 8. Results of Environmental Analysis

Environmental Consideration	Result of Alternative Evaluation
Ownership, Jurisdiction, and Land Use	No impact
Social and Economic Resources	No impact
Title VI/Environmental Justice	No substantial impact
Transportation	Beneficial impact
Biological Resources	No substantial impact
Cultural Resources	No impact
Air Quality Analysis	No substantial impact
Noise Analysis	No substantial impact
Visual Resources	No substantial impact
Water Resources	No substantial impact
Hazardous Materials	No substantial impact
Secondary Effects	No substantial impact
Cumulative Effects	No substantial impact

7.0 Project Preparers and Contributors

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