El Paso
Metropolitan Planning Organization

TRANSPORTATION POLICY BOARD AGENDA ITEM SUMMARY

October 18, 2024

AGENDA ITEM NO. 6:
Discussion and action to Consider authorizing the Executive Director to submit a letter to the General Services Administration (GSA) during the public comment period for the Draft Environmental Impact Statement for the Proposed Modernization of the Bridge of the Americas Land Port of Entry Enhanced Feasibility Study seeking to address MPO concerns with the preferred Alternative #4, and related issues.

RECOMMENDED MOTION:
Authorize the Executive Director to submit a letter to the General Services Administration (GSA) during the public comment period for the Draft Environmental Impact Statement for the Proposed Modernization of the Bridge of the Americas Land Port of Entry Enhanced Feasibility Study

SUPPORT INFORMATION:

- Proposed Letter
- Draft Environmental Impact Statement (EIS) Executive Summary

DISCUSSION/OPTIONS:
The Draft EIS for GSA's BOTA project has been released and is currently available for public comment. The Draft EIS identified the "preferred" alternative (Alternative 4) which proposes to close truck traffic permanently. At the September 2023 meeting the Transportation Policy Board authorized the Executive Director to submit a letter where it was recommended for GSA to consider an option where the improvements be designed in a way that allowed truck lanes and inspection facilities to be easily converted to private vehicle facilities in the future. Such an alternative was considered in the development of the Draft EIS (Alternative 1A) and can still be selected as the alternative to move forward.

At the October 11, 2024 meeting, the Executive Committee of the TPB made a motion to authorize MPO staff to prepare a letter to GSA concerning its preferred alternative and the usage of MPO data, and that the draft letter be prepared in time for TPB consideration at the October 18th meeting. The public comment period for the Draft EIS concludes on November 4th.

El Paso Metropolitan Planning Organization

DRAFT

October 18, 2024

U.S. General Services Administration
819 Taylor St. Room 12-B
Fort Worth, TX 76102

Attention: Karla Carmichael, NEPA Program Manager

Dear Ms. Carmichael

The El Paso Metropolitan Planning Organization (the "El Paso MPO") has reviewed the General Services Administration's ("GSA") Draft Environmental Impact Statement for the Proposed Modernization of the Bridge of the Americas Land Port of Entry in El Paso, Texas ("Draft EIS"). In response, and as part of the public comment period, the El Paso MPO submits the following:

I. GSA's Use of and Reliance on MPO Data

The El Paso MPO, as the federally designated metropolitan planning organization for El Paso County, Texas, southern Dona Ana County, New Mexico, and a small portion of Otero County, New Mexico, is a vital stakeholder interested in the planning, development, and implementation of the planned modernization of the Bridge of the Americas (the "Project"). In anticipation of the Draft EIS, the El Paso MPO shared with the GSA traffic and air quality (emissions) data and models for the region that include all six border crossings within the El Paso MPO region. Upon careful review of the Draft EIS, it appears that the GSA may have misconstrued some of the data provided by the El Paso MPO. To help ensure compliance with the National Environmental Policy Act ("NEPA") and to ensure that El Paso MPO data and models are used effectively and accurately by all local, state, and federal partners, the El Paso MPO raises the following issues for your consideration:

A. Draft EIS Table 1-2, page 1-5

The El Paso MPO provided the GSA with daily field counts collected in 2022 for private vehicles and for commercial trucks at the Bridge of the Americas. This data was incorrectly incorporated into the Draft EIS Table 1-2 by stating that the 2022 daily field counts are "Estimated 2024" values and "Monthly Traffic."

B. Section 2.6.2.9, page 2-32 and 2.6.3.9, page 2-49

The narrative provided in pages 2-32 and 2-49 of the Draft EIS is not an accurate representation of the analysis performed by the MPO. First, the data reported in these sections represent a scenario that is not consistent with any of the alternatives analyzed in the Draft EIS. Secondly, the numbers shown in pages 2-32 and 2-49 are erroneously reported as monthly values; they are daily numbers.

C. Traffic Analysis: 14,000 Additional car trips at BOTA Section 4, Tables 4-13, 4-14, 4-15, and 4-16

The El Paso MPO provided the GSA with traffic data for the six border crossings in the region under the scenarios that are being analyzed: Baseline, Alternative 1A with trucks, Alternative 1A without trucks, and Alternative 4. However, the tables mentioned above excluded the data from the Paso del Norte and Stanton crossings. When the complete data set is included in the tables, it is easy to explain the 14,000 additional private vehicles at BOTA under Alternative 4. They are being drawn away from the other crossings given that there is new additional capacity at BOTA and it remains as non-tolled. The Draft EIS states that the 14,000 increase in vehicles at BOTA "appears to be an outlier," which it clearly is not. El Paso MPO staff agrees that the regional and crossing-specific traffic analysis need to be revisited before the Draft EIS is finalized.

D. Air Quality: Section 4, Tables 4-18-4-19, 4-20 and, 4-21

Similar to the prior comment, the data shown in these tables omit emissions from the Paso del Norte and Stanton crossings, which are only for private vehicles. The totals shown in the bottom row of the table do not add up to the values shown because of this. Furthermore, on Table3 4-19 the values for the Santa Teresa crossing were copied from those from Ysleta. If the traffic analysis is revisited, as described in the prior comment, the emissions and air quality analysis will change and need to be described in the final version of the EIS.

All the foregoing observations are addressed in greater detail in the attached Technical Memo, which is incorporated into this Letter for all purposes. The El Paso MPO seeks to continue working with the GSA as the Project moves forward and would welcome the opportunity to meet with GSA to discuss and address the El Paso MPO's observations.

II. Additional Issues and Questions

The Transportation Policy Board is the El Paso MPO's governing board and it is comprised of local and state elected and appointed officials representative of the El Paso MPO's planning area. At a public meeting, on October 18, 2024, the TPB considered, discussed, and approved submission of the following issues and questions for the GSA's consideration as part of the public comment period:

A. The Draft EIS provides data on the numbers of **"Child Population"** within a 2-mile radius of influence for the BOTA (15,958) and Ysleta-Zaragoza (11,211) IBCs on pages 3-34 and 3-13 of the Draft EIS. What will be the impact of the additional truck traffic emissions on the child population in the vicinity of the Ysleta-Zaragoza IBC?

B. Are we moving the problem from one IBC to another? In other words, moving the congestion and air quality issues from BOTA to Ysleta/Zaragoza and other IBCs?

C. Given that the El Paso MPO is responsible for monitoring and managing the non-attainment status of the region, what is the regional impact on emissions given that trucks will now have to travel longer distances on both sides of the border to reach their destinations?

The El Paso MPO provides this Letter and Attachments to assist and improve the GSA's planning, design, and implementation of the Project, which will undoubtedly have a significant impact on the El Paso MPO's planning

area for many decades to come. Thank you for the opportunity to review and provide public comment on the EIS. If you have any questions, please contact me at ecalvo@elpasompo.org or at (915) 212-0258.

Respectfully submitted,

Eduardo Calvo, AICP
Executive Director

enclosures

Technical Memorandum - DRAFT

DATE: October, 9, 2024 **SUBJECT:** BOTA EIS draft observations

FROM: Jennifer Moreno, EPMPO

TO: Eduardo Calvo, Executive Director EPMPO
Salvador Gonzalez-Ayala, EPMPO

Purpose

This memo documents the observations made to the BOTA EIS draft, as well as the details on the data used and results.

1.- Table 1-2, page 1-5

This table incorrectly refers to monthly estimates and year 2024. It is from daily field counts (not estimates) in year 2022. I recommend the title of the table be corrected accordantly, and perhaps a text be added below the table to explain that 2024 northbound POV crossings decrease to less than 10,000/day while truck increase to over 500/day. These numbers are the average crossings calculated from data provided by CPB from April 15 to April 26, only during weekdays.

Table 1-2. Estimated 2024 Daily North- and Southbound BOTA Daily and Monthly Traffic – POV and Truck Traffic.

Hour	Northbound POV	Northbound Truck	Southbound POV	Southbound Truck
Midnight-1am	100	0	172	0
1am-2am	70	0	72	0
2am-3am	111	0	43	0
3am-4am	180	0	25	0
4am-5am	430	0	40	0
5am-6am	401	0	111	0
6am-7am	812	30	332	0
7am-8am	830	21	834	0
8am-9am	810	28	1143	3
9am-10am	801	34	1031	8
10am-11am	755	34	1121	9
11am-noon	749	34	1006	23
noon-1pm	753	40	1075	32
1pm-2pm	701	61	1140	47
2pm-3pm	609	37	1437	36
3pm-4pm	573	0	1740	28
4-pm-5pm	635	0	1710	23
5pm-6pm	581	0	1776	40
6pm-7pm	621	0	1651	29
7pm-8pm	531	0	1574	27
8pm-9pm	492	0	1198	18
9pm-10pm	334	0	837	12
10pm-11pm	212	0	852	19
11-midnight	180	0	516	4
TOTAL	**12274**	**319**	**21436**	**358**

Source: EPMPOa 2024.

Figure 1. BOTA EIS draft print screen page 1-5 Table 1-2

2.- Table 1-3 page 1-5

This table should be corrected. The source for this table should be corrected to read “averages obtained by EPMPO from CBP data for 2022”

The label for each column should read as follows:

1st column: Commercial Vehicles
2nd column: Commercial vehicles on express lane
3rd column: Passenger Vehicles
4th column: Passenger vehicles on DCL lane

Finally, the values in the table needs to be updated to the latest averages calculated from data reported by CBP (October 2023). Based on the historical data revised, this information may vary depending on the month.

1st column: 41
2nd column: 36
3rd column: 54
4th column: no DCL lanes on BOTA

Table 1-3. Average BOTA Queuing/Wait Times (Minutes).

Average Commercial Wait Times	Average Express Commercial Lane Wait Times	Average DCL Passenger Wait Times	Average DCL Lane Wait Times
4.9	3.2	26.5	0.0

EPMPO 2024a. DCL – Dedicated Commuter Lane.

3.- Section 2.6.2.9 page 2-32 and 2.6.3.9 page 2-49

The print screen below is from a scenario that is not part of the EIS. This scenario was just prohibiting trucks at BOTA, without any geometric-primary booth modifications; thus, it should be deleted from this document. Lastly, the information is shown incorrectly as monthly (the information is daily).

Print screen from EIS from page 4-32

- Santa Teresa – 35 trucks
- Ysleta-Zaragoza – 232 trucks
- Tornillo – no projected increase

Additionally, with the elimination of southbound cargo traffic, it is estimated that the following number of additional trucks would travel south through different ports monthly (EPMPO 2024):

- Santa Teresa – 20 trucks
- Ysleta-Zaragoza – 294 trucks
- Tornillo – no projected increase

If the EIS wants to show the impact of alternative 4, it should be according to the data of this table.

Northbound	Southbound
Santa Teresa - 51	Santa Teresa - 31
Ysleta-Zaragoza - 289	Ysleta-Zaragoza - 392
Tornillo – no projected increase	Tornillo - no projected increase

4.- Section 3 Table 3-31 page 3-57, Section 4 Tables 4-13, 4-14, 4-15, 4-16 pages 4-29 and 4-30

Tables below present the modeled daily traffic volumes of Baseline, Alternative 1a w/ trucks, Alternative 1a w/o trucks and Alternative 4. However, the results for Paso del Norte and Stanton international border crossings (IBCs) were omitted from the tables. I suggest this to be included as well for consistency.

Below each EIS table, I suggest how the tables should be presented (table in yellow headers)

Print screen from EIS from page 4-29

Table 4-13. No Action Modeled Daily Traffic Volumes.

Crossing	SB - POV	SB – ped.	SB - Truck	NB - POV	NB – ped.	NB - Truck
BOTA	***17334***	***2197***	***423***	***10563***	***2627***	***340***
Tornillo	621	26	25	466	27	29
Ysleta	9083	3425	2408	10347	4170	2466
Santa Teresa	2661	4	521	2341	5	543

SB – Southbound, NB – Northbound
EPMPO 2024

Suggested correction for Table 4-13

Crossing	SB - POV	SB - PED	SB - TRUCK	NB - POV	NB - PED	NB Truck
BOTA	17334	2197	423	10563	2627	340
Tornillo	621	26	25	466	27	29
Zaragoza	9083	3425	2408	10347	4170	2466
SantaTeresa	2661	4	521	2341	5	543
Stanton	5319	2289	0	4990	0	0
PDN	0	10658	0	6310	11771	0
Total	35018	18600	3378	35018	18600	3378

Print screen from EIS page 4-29

Table 4-14. Alternative 1a Modeled Daily Traffic Volumes.

Crossing	SB - POV	SB – ped.	SB - Truck	NB - POV	NB – ped.	NB - Truck
BOTA	***17334***	***2184***	***423***	***16890***	***2598***	***338***
Tornillo	621	26	25	459	27	29
Ysleta	9083	3314	2413	9172	4054	2473
SantaTeresa	2661	5	516	2141	6	538

SB – Southbound, NB - Northbound
EPMPO 2024

Suggested correction for Table 4-14

Crossing	SB - POV	SB - PED	SB - TRUCK	NB - POV	NB - PED	NB Truck
BOTA	17334	2184	423	16890	2598	338
Tornillo	621	26	25	459	27	29
Zaragoza	9083	3314	2413	9172	4054	2473
SantaTeresa	2661	5	516	2141	6	538
Stanton	5319	2248	0	2961	0	0
PDN	0	10593	0	3671	11685	0
Total	35018	18371	3378	35294	18371	3378

Print screen from EIS from page 4-30

Table 4-15. Alternative 1a (Future No Trucks) Modeled Daily Traffic Volumes.

Crossing	SB - POV	SB – ped.	SB - Truck	NB - POV	NB – ped.	NB - Truck
BOTA	***19669***	***2184***	***0***	***16890***	***2598***	***0***
Tornillo	609	26	25	459	27	29
Ysleta	8490	3314	2800	9172	4054	2755
SantaTeresa	2387	5	552	2141	6	594

SB – Southbound, NB - Northbound
EPMPO 2024

Suggested correction for Table 4-15

Crossing	SB - POV	SB - PED	SB - TRUCK	NB - POV	NB - PED	NB Truck
BOTA	19669	2184	0	16890	2598	0
Tornillo	609	26	25	459	27	29
Zaragoza	8490	3314	2800	9172	4054	2755
SantaTeresa	2387	5	552	2141	6	594
Stanton	4140	2248	0	2961	0	0
PDN	0	10593	0	3671	11685	0
Total	35294	18371	3378	35294	18371	3378

Print screen from EIS from page 4-30

Table 4-16. Alternative 4 Modeled Daily Traffic Volumes.

Crossing	SB - POV	SB – ped.	SB - Truck	NB - POV	NB – ped.	NB - Truck
BOTA	***17626***	***2132***	***0***	***24966***	***2759***	***0***
Tornillo	630	26	25	427	27	29
Ysleta	9565	2952	2799	6095	3662	2754
SantaTeresa	2605	4	553	1674	5	595

SB – Southbound, NB - Northbound
EPMPO 2024

Suggested correction for Table 4-16

Crossing	SB - POV	SB - PED	SB - TRUCK	NB - POV	NB - PED	NB Truck
BOTA	17626	2132	0	24966	2759	0
Tornillo	630	26	25	427	27	29
Zaragoza	9565	2952	2799	6095	3662	2754
SantaTeresa	2605	4	553	1674	5	595
Stanton	5213	2414	0	601	0	0
PDN	0	10480	0	1876	11556	0
Total	35639	18010	3378	35639	18010	3378

5.- Section 4.8.3 paragraph page 4-30

The statement in the red rectangle from the EIS is unsubstantiated. There is no strong argument for this to be an "outlier" when you observe that the EPMPO model is redistributing flows from other IBCs based on improved wait times at BOTA.

Print screen from EIS page 4-30

4.8.3 Viable Action Alternative 4 – Multi-Level Modernization within the Existing Port Boundaries with Minor Land Acquisition Immediately Adjacent to the Port (Approximately 4 acres – TxDOT) and Elimination of Commercial Cargo Operations

Implementing this alternative would be expected to result in potential negligible to minor short-term adverse impacts as a result of construction activities. However, implementation of the mitigation/protective measures described earlier in Section 2.6.3.6 would be expected to minimize any potential short-term adverse impact resulting from construction activities and conditions would be expected to greatly improve once modernization activities are completed. The moderate to significant long-term adverse effects associated with the commercial traffic would be completely eliminated resulting in a long-term moderate to significant beneficial impact. Minor long-term beneficial impacts to pedestrians would also be anticipated as a result of modernization of the port. Table 4-16 shows the modeled daily traffic volumes that would be expected at all ports under this alternative. As shown, similar to the previous alternative, with the exception of the modeled northbound POV traffic, all other traffic remains relatively unchanged. Northbound POV traffic is showing an increase of approximately 14,000 vehicles. Ysleta and Santa Teresa also show slight increases in POV traffic. The projected BOTA increase appears to be an outlier and is undergoing further review and changes will be incorporated in the Final EIS. Similar to the previous alternative with the future elimination of commercial truck traffic option implemented, the modeling shows that approximately 300 more trucks would enter the U.S. daily through the Ysleta LPOE and approximately 50 through the Santa Teresa LPOE. These numbers are not considered significant and would not be anticipated to have an adverse effect on the local transportation network at these ports. All other traffic numbers vary only slightly.

6.- Tables 4-18, 4-19, 4-20, & 4-21 pages 4-32 and 4-33

Tables display daily idling emissions modeled from MPO tools. It's important to note that the tables presented in the draft omit emissions from the Paso del Norte and Stanton international border crossings.

The total emissions sum at the bottom accounts for the aggregate emissions from all six international border crossings (IBCs), rather than only those listed in the tables. The tables should reflect all IBCs in the region, so the sum can add up correctly.

Print screen from EIS page 4-32

Table 4-18. Baseline (No Action) 2024 Regional Emissions Modeling from Vehicles (POVs and Trucks) and Idling.

LPOE	Daily NOx (kg/day)[1]	Daily VOC (kg/day)[1]
BOTA	***139***	***39***
Tornillo	8	2
Ysleta	247	33
Santa Teresa	8	1
TOTAL	**478**	**98**

EPMPO 2024. 1 – ozone precursors.

Suggested correction for Table 4-18

Crossing	daily NOx (kg/day)	daily VOC (kg/day)
BOTA	139	39
Tornillo	8	2
Zaragoza	247	33
SantaTeresa	8	1
Stanton	53	16
PDN	23	7
Total	**478**	**98**

Print screen from EIS page 4-32

Table 4-19. Alternative 1a 2024 Regional Emissions Modeling from Vehicles (POVs and Trucks) and Idling.

LPOE	Daily NOx (kg/day) [1]	Daily VOC (kg/day) [1]
BOTA	***124***	***23***
Tornillo	7	1.7
Ysleta	245	30
Santa Teresa	245	30
TOTAL	**686**	**105**

EPMPO 2024. 1 – ozone precursors.

Suggested correction for Table 4-19

Crossing	daily NOx (kg/day)	daily VOC (kg/day)
BOTA	124	23
Tornillo	7	2
Zaragoza	245	33
SantaTeresa	7	1
Stanton	45	14
PDN	20	6
Total	**448**	**78**

Print screen from EIS page 4-33

Table 4-20. Alternative 1a (Future No Trucks) 2024 Regional Emissions Modeling from Vehicles (POVs and Trucks) and Idling.

LPOE	Daily NOx (kg/day) [1]	Daily VOC (kg/day) [1]
BOTA	***148***	***37***
Tornillo	7	2
Ysleta	253	28
Santa Teresa	7	1
TOTAL	**476**	**86**

EPMPO 2024. 1 – ozone precursors.

Suggested correction for Table 4-20

Crossing	daily NOx (kg/day)	daily VOC (kg/day)
BOTA	**148**	**37**
Tornillo	7	2
Zaragoza	253	28
SantaTeresa	7	1
Stanton	43	12
PDN	20	6
Total	**476**	**86**

Print screen from EIS page 4-33

Table 4-21. Alternative 4 2024 Regional Emissions Modeling from Vehicles (POVs and Trucks) and Idling.

LPOE	Daily NOx (kg/day) [1]	Daily VOC (kg/day) [1]
BOTA	***106***	***15***
Tornillo	7	2
Ysleta	251	28
Santa Teresa	7	1
TOTAL	**434**	**65**

EPMPO 2024. 1 – ozone precursors.

Suggested correction for Table 4-21

Crossing	daily NOx (kg/day)	daily VOC (kg/day)
BOTA	**106**	**15**
Tornillo	7	2
Zaragoza	251	28
SantaTeresa	7	1
Stanton	44	13
PDN	19	6
Total	**434**	**65**

7.- Table 4-19 page 4-32

In this table a typographical error was identified in the daily NOx and VOC emissions modeled from idling. For Alternative 1a, which includes truck traffic at BOTA, the table incorrectly presents emissions for Santa Teresa as 245 kg/day of NOx and 30 kg/day of VOC. The correct results from model simulations for Santa Teresa are 7 kg/day of NOx and 1 kg/day of VOC.

The total sum should also be correct as shown below.

Additionally, the statement, “daily NOx and daily VOC have been modeled to… increase quite a bit at Santa Teresa,” (BOTA EIS draft, pg.4-32) does not accurately reflect the model results. Such statement should be deleted from the EIS.

Table 4-19. Alternative 1a 2024 Regional Emissions Modeling from Vehicles (POVs and Trucks) and Idling.

LPOE	Daily NOx (kg/day) [1]	Daily VOC (kg/day) [1]
BOTA	***124***	***23***
Tornillo	7	1.7
Ysleta	245	30
Santa Teresa	245	30
TOTAL	**686**	**105**

EPMPO 2024. 1 – ozone precursors.

Crossing	daily NOx (kg/day)	daily VOC (kg/day)
BOTA	124	23
Tornillo	7	2
Zaragoza	245	33
SantaTeresa	7	1
Stanton	45	14
PDN	20	6
Total	**448**	**78**

8.-Table 3-32 page 3-57

The source of this table needs to read that projections are obtained from the TxDOT SAM model.

Table 3-32. Projected Future Daily North- and Southbound Traffic (POV and Trucks).

Forecast Year	BOTA	Tornillo	Ysleta	Santa Teresa
2032	41,981	1723	27,394	3995
2040	43,666	1793	28,468	4154
2050	46,547	1909	30,349	4429

EPMPO 2024.

EXECUTIVE SUMMARY

On November 6, 2021, Congress passed the Bipartisan Infrastructure Law (BIL), also known as the Infrastructure Investment and Jobs Act (IIJA). On November 15, 2021, the President signed Executive Order (EO) 14052 "Implementation of the Infrastructure Investment and Jobs Act." Finally on December 13, 2021, the President signed EO 14508 "Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government." On February 25, 2022, President Biden and the General Services Administration (GSA) announced the list of major Land Port of Entry (LPOE) projects funded by the BIL. This included the Bridge of the Americas (BOTA) LPOE in El Paso, Texas.

This Environmental Impact Statement (EIS) has been prepared in accordance with Section 102 of the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321 to 4370d), as implemented by the regulations promulgated by the Council on Environmental Quality (CEQ) (40 Code of Federal Regulations [CFR] §1500-1508). The principal objectives of NEPA are to ensure the careful consideration of environmental aspects of proposed actions in federal decision-making processes and to make environmental information available to decision makers and the public before decisions are made and actions are taken. Additionally, this EIS has been prepared in accordance with GSA NEPA guidelines (GSA Order ADM 1095.1F and the Public Buildings Service [PBS] NEPA Desk Guide, both dated October 1999) and serves as a mechanism for compliance with the National Historic Preservation Act (NHPA) of 1966 (as amended) and other relevant laws and/or regulations.

PURPOSE AND NEED

The purpose of the proposed action is for the GSA to support CBP's mission by bringing the BOTA LPOE operations in line with current CBP land port design standards (i.e., CBP Land Port of Entry Design Standard [CBP 2023]) and operational requirements while addressing existing deficiencies identified with the ongoing port operations. In order to bring the BOTA LPOE in line with CBP's design standards and operational requirements, action is needed to satisfy the following overriding needs:

- Improve the capacity and functionality of the LPOE to meet future public demand, while maintaining the capability to meet border security initiatives.
- Ensure the safety and security for the employees and the travelling public.
- Improve traffic congestion and safety for travelers and citizens of the City of El Paso.

The existing BOTA LPOE must remain open and operational well into the future to allow CBP to continue to meet its mission requirements on the southern border, and more in particular, in the El Paso, Texas area. As a result of new/updated PORs (discussed earlier in Section 1.2), the BOTA LPOE, as it currently exists, does not comply with the new/updated standards. As mentioned, the standard is used to develop planning and programming criteria for inclusion in PORs, direct execution of design and engineering documentation, inform construction and construction administration stages, and establish project close-out and post-occupancy roles and responsibilities. In order to satisfy new/updated PORs at the port, new/updated square footage requirements would be necessary. These new square footages are presented later in Section 2.0 as the operational requirements associated with each viable alternative carried forward for detailed study.

In an effort to satisfy the purpose and need for the proposed action, several goals/guidelines were developed by the GSA to compare and contrast alternative ways of fulfilling the objectives of the proposed action. Those specific goals/guidelines include:

(1) Comply with the CBP Land Port of Entry Design Standard (CBP 2023) and associated new/updated POR requirements.
(2) Comply with GSA's Facilities Standards for the Public Buildings Service (P100) (GSA 2024).

(3) Support the growth needs of the CBP, other tenant agencies, and the needs of the local community.
(4) Provide for increased CBP and tenant efficiencies.
(5) Improve vehicular and pedestrian traffic flow and processing times.
(6) Improve the safety of workers and the traveling public.
(7) Provide any improvements consistent with the goals of stakeholders (when possible).
(8) Minimize disruption to CBP and other tenant agencies' operations and activities throughout any improvements.
(9) Minimize the impact to the environment and the local community.
(10) Provide any improvements in a cost-effective manner.

PROPOSED ACTION AND ALTERNATIVES

The GSA proposes to satisfy the purpose and need for action by renovating/updating the BOTA LPOE to bring infrastructure in line with current CBP land port design standards (i.e., CBP Land Port of Entry Design Standard [CBP 2023]) and operational requirements while addressing existing deficiencies identified with the ongoing port operations. As part of initial planning for the proposed modernization of the port, GSA and its stakeholder partners developed four (4) "Possible" Action Alternatives to satisfy the purpose and need for the project:

- Possible Action Alternative 1 – Multi-Level Modernization Primarily within Existing Port Boundaries with Minor Land Acquisition Immediately Adjacent to the Port and Additional Land Acquisition (12 acres – 8 TxDOT, 4 El Paso County) to the East

- Possible Action Alternative 2 – Multi-Level Modernization Primarily within Existing Port Boundaries with Minor Land Acquisition Immediately Adjacent to the Port and Additional Land Acquisition (14 acres – 5 TxDOT, 9 El Paso County) to the East
- Possible Action Alternative 3 – Multi-Level Modernization within the Existing Port Boundaries with Minor Land Acquisition Immediately Adjacent to the Port (8 acres TxDOT) and Elimination of Commercial Cargo Operations

- Possible Action Alternative 4 – Multi-Level Modernization with the Existing Port Boundaries with Minor Land Acquisition Immediately Adjacent to the Port and Significant Land Acquisition (36 acres – 12 TxDOT, 24 El Paso County) to the East for Commercial Cargo Operations

The four (4) "Possible" Action Alternatives listed above were further evaluated by internal agency stakeholders and resulted in the following "Viable" Action Alternatives:

- Viable Action Alternative 1 (originally Possible Action Alternative 1) – Multi-Level Modernization Primarily within Existing Port Boundaries with Minor Land Acquisition Immediately Adjacent to the Port and Additional Land Acquisition to the East (Approximately 12 acres – 8 TxDOT, 4 El Paso County)

- Viable Action Alternative 1a – Multi-Level Modernization (High/Low Booths) Primarily within Existing Port Boundaries with Minor Land Acquisition Immediately Adjacent to the Port and Additional Land Acquisition to the East (Approximately 12 acres – TxDOT)

- Viable Action Alternative 2 (originally Possible Action Alternative 2) – Multi-Level Modernization Primarily within Existing Port Boundaries with Minor Land Acquisition Immediately Adjacent to the Port and Additional Land Acquisition to the East (Approximately 14 acres – 5 TxDOT, 9 El Paso County)

- Viable Action Alternative 3 (originally Possible Action Alternative 4) – Multi-Level Modernization within the Existing Port Boundaries with Minor Land Acquisition Immediately Adjacent to the Port

and Significant Land Acquisition to the East for Commercial Cargo Operations (Approximately 36 acres – 12 TxDOT, 24 El Paso County)

These "Viable" alternatives were finally subject to a two-tiered evaluation formulated to concentrate on the purpose and need for the proposed action – renovating/updating the BOTA LPOE to bring infrastructure in line with current CBP land port design standards and operational requirements while addressing existing deficiencies identified with the ongoing port operations:

- Tier 1 evaluated whether or not the various alternatives would fully meet the purpose and need selection guidelines.
- Tier 2 evaluated whether or not the various alternatives would result in adverse environmental impacts.

As a result of this evaluation, Tier 2 took into consideration two final Action Alternatives, as they fully satisfied all the Tier 1 criteria (i.e., the purpose and need for action). These final two Action Alternatives were carried forward for detailed analysis in the EIS. The No Action Alternative did not satisfy the Tier 1 criteria; however, pursuant to NEPA, the No Action Alternative was carried forward as the baseline to which potential impacts of the Action Alternatives could be measured. The following alternatives were carried forward:

- No Action
- Viable Action Alternative 1a – Multi-Level Modernization (High/Low Booths) Primarily within Existing Port Boundaries with Minor Land Acquisition Immediately Adjacent to the Port (8 acres TxDOT) and Additional Land Acquisition to the East (13 acres – TxDOT)
- Viable Action Alternative 4 – Multi-Level Modernization within the Existing Port Boundaries with Minor Land Acquisition Immediately Adjacent to the Port (8 acres - TxDOT) and Elimination of All Commercial Cargo Operations

THE GSA HAS SELECTED VIABLE ACTION ALTERNATIVE 4 AS ITS PREFERRED ALTERNATIVE. GSA BELIEVES THIS ALTERNATIVE WOULD BEST FULFILL ITS STATUTORY MISSION AND RESPONSIBILITIES, GIVING CONSIDERATION TO ECONOMIC, ENVIRONMENTAL, TECHNICAL, AND OTHER FACTORS.

Viable Action Alternative 1a and 4 are described briefly below.

Viable Action Alternative 1a – Multi-Level Modernization (High/Low Booths) Primarily within Existing Port Boundaries with Minor Land Acquisition Immediately Adjacent to the Port and Additional Land Acquisition to the East (Approximately 12 acres – TxDOT)

This alternative is considered to be a compact and land-efficient design/site layout. This alternative has a multi-level design, with the majority of port operations located on the existing site, with FMCSA inspections co-located with TxDOT to the east and the kennel and auxiliary training facility located on the east site as well. This alternative would also include acquisition of a small amount of land at the perimeter of the existing site, primarily within the TxDOT ROW as well as additional TxDOT land to the east for the kennel and auxiliary training facility. There would be a total of 12.4 acres acquired from TxDOT. Viable Action Alternative 1a includes the following characteristics (Figure ES-1):

- Highly compact plan
- Minimal land acquisition (12.4-acre acquisition from TxDOT)
- POV and commercial primary and secondary on existing (west) site
- Ancillary facilities only on new (east) site
- Efficient operations and circulation
- Interconnected CBP operations buildings
- Lower-level staff and visitor parking

- Lower-level pedestrian processing
- Ground level POV primary and secondary
- Ground level commercial secondary and NII
- Upper-level commercial primary and administration
- High-low inspection booths incorporated at commercial primary for operational flexibility
- Below-grade stormwater detention/retention vaults
- Option for future elimination of commercial cargo operations moving north and south

Figure ES-1. Viable Action Alternative 1a General Site Design/Layout and Land Acquisition.

Viable Action Alternative 4 – Multi-Level Modernization within the Existing Port Boundaries with Minor Land Acquisition Immediately Adjacent to the Port (Approximately 4 acres – TxDOT) and Elimination of All Commercial Cargo Operations

Similar to Viable Action Alternative 1a, this alternative is considered to be a compact and land-efficient design/site layout with the existing site utilized for POV, bus, and pedestrian traffic. As part of this alternative, there would no longer be commercial cargo operations at the port (both northbound and southbound), instead, the number of POV lances would substantially increase. Similar to the previous alternative, this alternative would include acquisition of a small amount of land at the perimeter of the existing site, primarily within the TxDOT ROW. Viable Action Alternative 4 includes the following characteristics (Figure ES-2):

- Minimal land acquisition (4.4-acre acquisition from TxDOT)
- With all lanes in alignment along a transverse axis, this alternative would offer operational adaptability to reassign inbound lanes to outbound inspections as required.
- The central location of the main building supports resource efficiency and improves operations and officer response time. The location and density afford opportunities for clear vistas, increased potential for supervision and oversight across port environments.
- No land acquisition east of US-54 is required or proposed. Land acquisition needs are minimal and limited to those areas at the existing site perimeter in TxDOT right-of-way.

- Provides expansion capacity below grade for parking, support space, and pedestrian processing. Provides expansion potential vertically at second level or higher for administration or support agency office space.

Figure ES-2. Viable Action Alternative 4 General Site Design/Layout and Land Acquisition.

EXISTING ENVIRONMENT

In accordance with CEQ regulations (§1500.4 and §1501.7), issues addressed or important issues relating to the proposed action were identified through scoping. Issues studied in detail in this EIS were determined through stakeholder and public scoping meetings. Issues studied in detail include:

- Hazardous Materials, Waste, and/or Site Contamination
- Socioeconomics (including Environmental Justice and Protection of Children)
- Public Services, Infrastructure, and Utilities
- Surface Waters, Drainage, and Floodplains
- Land Use and Zoning (including Visual and Aesthetics)
- Traffic (Vehicular and Pedestrian), Transportation, and Parking
- Air Quality (including Greenhouse Gas Emissions)
- Noise and Vibration
- Cultural and Historic Resources

ENVIRONMENTAL CONSEQUENCES

Significance criteria were defined as a means of estimating or measuring the degree of potential environmental impact. The significance of impacts was determined systematically by assessing the magnitude (how much) and duration (how long) of a potential impact (Table ES-1):

Table ES-1. Environmental Impact Significance Criteria.

Criteria	Magnitude
Significant	Substantial impact or change to a resource that is easily defined, noticeable and measurable, or which exceeds regulatory standards.
Moderate	Noticeable change in a resource occurs but the integrity of the resource remains intact.
Minor	Change in a resource occurs but no substantial impact results.
Negligible	The impact is at the lowest level 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.
Short-Term	Impact would last for a short period or portion of the project.

The following table (Table ES-2) provides a summary of the environmental consequences associated with implementing the proposed action through the selection of each Action Alternative or selecting the No Action Alternative.

Table ES-2. Alternatives Comparison Matrix Summary.

Environmental Attributes (Threshold Criteria)	No Action Impact (Magnitude and Duration)	Alternative 1a Impact (Magnitude and Duration)	Alternative 4 Impact (Magnitude and Duration)
Hazardous Materials, Waste, and/or Site Contamination			
Results in significant hazardous materials and/or waste generated, transported, and/or disposed of as a result of construction and/or operational activities? Any anticipated impacts?	No, None	No, None [2]	No, None [2]
Existing hazardous materials, waste, or site contamination issues present and if so, have been investigated/ remediated to appropriate standards for future use of the site? Any anticipated impacts?	Unknown[1]	Unknown[1], None	Unknown[1], None
Public Services, Infrastructure, and Utilities			
Results in significant strain/demand on existing public services, infrastructure, and/or utilities? Any anticipated impacts?	No, None	No, None	No, None
Results in significant disruption to existing public services, infrastructure, and/or utilities? Any anticipated impacts?	No, None	No, Yes -Minor/ Negligible Short-Term Negative[2]	No, Yes - Minor/ Negligible Short-Term Negative[2]
Surface Waters, Drainage, and Floodplains			
Results in significant impacts to surface water features including wetlands and/or waters of the U.S? Any anticipated impacts?	No, None	No, None[2]	No, None[2]
Results in significant stormwater run-off in excess of that regulated by federal, state, and/or local code/ordinance? Any anticipated impacts?	No, None	No, None[2]	No, None[2]
Results in development within the defined 100-year flood zone? Any anticipated impacts?	No, None	Yes, None[2]	Yes, None[2]

1 - Pending results of additional Phase II investigations currently being conducted by GSA.
2 - Based on environmental commitments associated with implementation (see Sections 2.6.2.6 and 2.6.3.6).

Table ES-2 (cont.). Alternatives Comparison Matrix Summary.

Environmental Attributes (Threshold Criteria)	No Action Impact (Magnitude and Duration)	Alternative 1a Impact (Magnitude and Duration)	Alternative 4 Impact (Magnitude and Duration)
Land Use and Zoning (including Visual and Aesthetics)			
Results in conflict with existing and/or planned land use of the site? Any anticipated impacts?	No, None	No, None	No, None
Results in conflict with existing and/or planned land use of the immediate surrounding area? Any anticipated impacts?	No, None	No, None	No, None
Would be in conflict with prevailing zoning designations? Any anticipated impacts?	No, None	No, None	No, None
Results in visual/aesthetic impacts not consistent with surrounding land use? Any anticipated impacts?	No, None	Yes, Minor Short-Term Negative, Minor-Moderate Long-Term Beneficial	Yes, Minor Short-Term Negative, Minor-Moderate Long-Term Beneficial
Cultural Resources			
Results in significant effects to archaeological resources (buried historic resources)? Any anticipated impacts?	No, None	No, None [2]	No, None [2]
Result in significant effects to historic districts and/or architectural properties (built historic resources)? Any anticipated impacts?	No, None	No, None [2]	No, None [2]
Results in significant effects to Tribal religious or cultural resources? Any anticipated impacts?	No, None	No, None	No, None
Socioeconomics			
Result in significant change to area population and housing? Any anticipated impacts?	No, None	No, Short-Term Negligible, Long-Term Negligible-Minor Beneficial & Adverse	No, Short-Term Negligible, Long-Term Negligible-Minor Beneficial Population & Adverse Housing
Results in significant change in area employment, unemployment, and/or income? Any anticipated impacts?	No, None	No, Short-Term Minor Beneficial, Long-Term Minor-Moderate Beneficial	No, Short-Term Minor Beneficial, Long-Term Minor-Moderate Beneficial
Results in significant change to area businesses/revenue as a result of purchasing, rentals, etc? Any anticipated impacts?	No, None	No, Short-Term Minor-Moderate, Long-Term Negligible-Minor	No, Short-Term Minor-Moderate, Long-Term Negligible-Minor
Results in a significant change to community services? Any anticipated impacts?	No, None	No, Short- & Long-Term Negligible-Minor	No, Short- & Long-Term Negligible-Minor
Results in a significant change to perceived quality of life? Any anticipated impacts?	No, Minor Long-Term Negative	No, Short-Term Minor, Long-Term Negligible-Minor	No, Short-Term Minor, Long-Term Negligible-Minor

2 - Based on environmental commitments associated with implementation (see Sections 2.6.2.6 and 2.6.3.6).

Table ES-2 (cont.). Alternatives Comparison Matrix Summary.

Environmental Attributes (Threshold Criteria)	No Action Impact (Magnitude and Duration)	Alternative 1a Impact (Magnitude and Duration)	Alternative 4 Impact (Magnitude and Duration)
Environmental Justice and Protection of Children			
Results in significant or disproportionate environmental justice impacts as a result of adverse socioeconomic, air quality, noise, traffic, or hazmat impacts anticipated from each alternative?	No, None[3]	No, None[3]	No, None[3]
Results in significant or disproportionate impacts to children as a result of adverse socioeconomic, air quality, noise, traffic, or hazmat impacts anticipated from each alternative?	No, None[3]	No, None[3]	No, None[3]
Socioeconomics			
Result in significant change to area population and housing? Any anticipated impacts?	No, None	No, Short-Term Negligible, Long-Term Negligible-Minor Beneficial & Adverse	No, Short-Term Negligible, Long-Term Negligible-Minor Beneficial Population & Adverse Housing
Results in significant change in area employment, unemployment, and/or income? Any anticipated impacts?	No, None	No, Short-Term Minor Beneficial, Long-Term Minor-Moderate Beneficial	No, Short-Term Minor Beneficial, Long-Term Minor-Moderate Beneficial
Results in significant change to area businesses/revenue as a result of purchasing, rentals, etc? Any anticipated impacts?	No, None	No, Short-Term Minor-Moderate, Long-Term Negligible-Minor	No, Short-Term Minor-Moderate, Long-Term Negligible-Minor
Results in a significant change to community services? Any anticipated impacts?	No, None	No, Short- & Long-Term Negligible-Minor	No, Short- & Long-Term Negligible-Minor
Results in a significant change to perceived quality of life? Any anticipated impacts?	No, Minor Long-Term Negative	No, Short-Term Minor, Long-Term Negligible-Minor	No, Short-Term Minor, Long-Term Negligible-Minor
Noise			
Would be in conflict with prevailing local noise ordinances? Any anticipated impacts?	No, None	No, None[1]	No, None[1]
Results in unacceptable short-/long-term noise levels to workers or port personnel? Any anticipated impacts?	No, None[1]	Yes, Short-Term Negligible Adverse Construction[1]	Yes, Short-Term Negligible Adverse Construction[1]
Results in unacceptable short-/long-term noise levels to visitors or pedestrian travelers? Any anticipated impacts?	No, None[1]	Yes, Short-Term Negligible Adverse Construction[1]	Yes, Short-Term Negligible Adverse Construction[1]
Results in unacceptable short-/long-term noise levels to nearby sensitive receptors? Any anticipated impacts?	Yes, Long-Term Minor to Moderate Adverse (Truck Idling)	Yes, Short-Term Negligible Adverse Construction Yes, Long-Term Minor to Moderate Adverse Truck Idling[2]	Yes, Short-Term Negligible Adverse Construction[1] Yes Long-Term Moderate to Significant Beneficial (Elimination of Truck Traffic)
Results in vibrations that could affect nearby sensitive receptors? Any anticipated impacts?	No, None	No, None[1]	No, None[1]

1 - Based on implementation of the mitigation/protective measures described in Section 2.6.2.6 and 2.6.3.6.
2 – Long-term minor to moderate adverse impact from southbound trucks idling would be eliminated should the future removal of all commercial cargo traffic be implemented. This is considered to be a long-term moderate to significant beneficial impact.
3 – See Section 4.6.2

Table ES-2 (cont.). Alternatives Comparison Matrix Summary.

Environmental Attributes (Threshold Criteria)	**No Action** Impact (Magnitude and Duration)	**Alternative 1a** Impact (Magnitude and Duration)	**Alternative 4** Impact (Magnitude and Duration)
Environmental Justice and Protection of Children			
Traffic (Vehicular and Pedestrian), Transportation and Parking			
Would result in impact to area vehicular traffic and/or transportation routes? Any anticipated impacts?	No, None (no construction) Yes, Minor-Moderate (approaching significant) Long-Term Adverse (SB truck traffic, increased traffic over time w/ no improvements)	Yes, Negligible-Minor Short-Term Adverse (Construction)1 Yes, Moderate-Significant Long-Term Adverse Operations (SB truck traffic)[2]	Yes, Negligible-Minor Short-Term Adverse (Construction)1 Yes, Moderate to Significant Long-Term Beneficial (elimination of truck traffic)
Would result in impact to area pedestrian traffic and routes? Any anticipated impacts?	No, Minor-Moderate Long-Term Negative	No, Minor-Moderate Long-Term Beneficial	No, Minor-Moderate Long-Term Beneficial
Would result in safety issues for the travelling public and/or port personnel Any anticipated impacts?	No, Minor-Moderate Long-Term Negative	No, Minor-Moderate Long-Term Beneficial	No, Minor-Moderate Long-Term Beneficial
Would result in parking requirements that could not be adequately met or provides undo demand on available public parking availability? Any anticipated impacts?	No, None	No, Minor- Long-Term Beneficial	No, Minor- Long-Term Beneficial

1 - Based on implementation of the mitigation/protective measures described in Section 2.6.2.6 and 2.6.3.6.
2 – Long-term minor to moderate adverse impact from southbound trucks idling would be eliminated should the future removal of all commercial cargo traffic be implemented. This is considered to be a long-term moderate to significant beneficial impact.

Table ES-2 (cont.). Alternatives Comparison Matrix Summary.

Environmental Attributes (Threshold Criteria)	**No Action** Impact (Magnitude and Duration)	**Alternative 1a** Impact (Magnitude and Duration)	**Alternative 4** Impact (Magnitude and Duration)
Environmental Justice and Protection of Children			
Air Quality			
Results in a short-term increase above de minimis standards or causes an exceedance or violation of prevailing NAAQS? Any anticipated impacts?	No, None	No, None[1]	No, None[1]
Results in a long-term increase above de minimis standards or causes an exceedance or violation of prevailing NAAQS? Any anticipated impacts?	No, None	No, None[1]	No, None[1]
Results in short- or long-term public/community health or other related environmental impact?	Yes, Long-Term Moderate-Significant Adverse Impact	Yes, Long-Term Moderate-Significant Adverse Impact (Truck Traffic) Yes, Long-Term Moderate-Significant Beneficial Impact (elimination of truck traffic future option)[2]	Yes, Long-Term Moderate-Significant Beneficial Impact (elimination of truck traffic future option)
Results in short- or long-term impacts as a result of Regional NOx and/or VOC increases? Any anticipated Impacts?	Yes, Long-Term Negligible to Minor Adverse	Yes, Long-Term Negligible to Minor Beneficial	Yes, Long-Term Negligible to Minor Beneficial
Results in GHG emissions above established standards? Any anticipated impacts?	No, None	No, None	No, None
Hazardous Materials, Waste, and/or Site Contamination			
Results in significant hazardous materials and/or waste generated, transported, and/or disposed of as a result of construction and/or operational activities? Any anticipated impacts?	No, None	No, None 2	No, None 2
Existing hazardous materials, waste, or site contamination issues present and if so, have been investigated/ remediated to appropriate standards for future use of the site? Any anticipated impacts?	Unknown[1]	Unknown[1], None	Unknown[1], None

1 - Based on implementation of the mitigation/protective measures described in Section 2.6.2.6 and 2.6.3.6.
2 – Long-term minor to moderate adverse impact from southbound trucks idling would be eliminated should the future removal of all commercial cargo traffic be implemented. This is considered to be a long-term moderate to significant beneficial impact.

Table ES-2 (cont.). Alternatives Comparison Matrix Summary.

Environmental Attributes (Threshold Criteria)	**No Action** Impact (Magnitude and Duration)	**Alternative 1a** Impact (Magnitude and Duration)	**Alternative 4** Impact (Magnitude and Duration)
Noise			
Would be in conflict with prevailing local noise ordinances? Any anticipated impacts?	No, None	No, None[1]	No, None[1]
Results in unacceptable short-/long-term noise levels to workers or port personnel? Any anticipated impacts?	No, None[1]	Yes, Short-Term Negligible Adverse Construction[1]	Yes, Short-Term Negligible Adverse Construction[1]
Results in unacceptable short-/long-term noise levels to visitors or pedestrian travelers? Any anticipated impacts?	No, None[1]	Yes, Short-Term Negligible Adverse Construction[1]	Yes, Short-Term Negligible Adverse Construction[1]
Results in unacceptable short-/long-term noise levels to nearby sensitive receptors? Any anticipated impacts?	Yes, Long-Term Minor to Moderate Adverse (Truck Idling)	Yes, Short-Term Negligible Adverse Construction Yes, Long-Term Minor to Moderate Adverse Truck Idling[2]	Yes, Short-Term Negligible Adverse Construction[1] Yes Long-Term Moderate to Significant Beneficial (Elimination of Truck Traffic)
Results in vibrations that could affect nearby sensitive receptors? Any anticipated impacts?	No, None	No, None[1]	No, None[1]
Traffic (Vehicular and Pedestrian), Transportation and Parking			
Would result in impact to area vehicular traffic and/or transportation routes? Any anticipated impacts?	No, None (no construction) Yes, Minor-Moderate (approaching significant) Long-Term Adverse (SB truck traffic, increased traffic over time w/ no improvements)	Yes, Negligible-Minor Short-Term Adverse (Construction)[1] Yes, Moderate-Significant Long-Term Adverse Operations (SB truck traffic)2	Yes, Negligible-Minor Short-Term Adverse (Construction)[1] Yes, Moderate to Significant Long-Term Beneficial (elimination of truck traffic)
Would result in impact to area pedestrian traffic and routes? Any anticipated impacts?	No, Minor-Moderate Long-Term Negative	No, Minor-Moderate Long-Term Beneficial	No, Minor-Moderate Long-Term Beneficial
Would result in safety issues for the travelling public and/or port personnel Any anticipated impacts?	No, Minor-Moderate Long-Term Negative	No, Minor-Moderate Long-Term Beneficial	No, Minor-Moderate Long-Term Beneficial
Would result in parking requirements that could not be adequately met or provides undo demand on available public parking availability? Any anticipated impacts?	No, None	No, Minor- Long-Term Beneficial	No, Minor- Long-Term Beneficial

1 - Based on implementation of the mitigation/protective measures described in Section 2.6.2.6 and 2.6.3.6.
2 – Long-term minor to moderate adverse impact from southbound trucks idling would be eliminated should the future removal of all commercial cargo traffic be implemented. This is considered to be a long-term moderate to significant beneficial impact.

Table ES-2 (cont.). Alternatives Comparison Matrix Summary.

Environmental Attributes (Threshold Criteria)	**No Action** Impact (Magnitude and Duration)	**Alternative 1a** Impact (Magnitude and Duration)	**Alternative 4** Impact (Magnitude and Duration)
Air Quality			
Results in a short-term increase above de minimis standards or causes an exceedance or violation of prevailing NAAQS? Any anticipated impacts?	No, None	No, None[1]	No, None[1]
Results in a long-term increase above de minimis standards or causes an exceedance or violation of prevailing NAAQS? Any anticipated impacts?	No, None	No, None[1]	No, None[1]
Results in short- or long-term public/community health or other related environmental impact?	Yes, Long-Term Moderate-Significant Adverse Impact	Yes, Long-Term Moderate-Significant Adverse Impact (Truck Traffic) Yes, Long-Term Moderate-Significant Beneficial Impact (elimination of truck traffic future option)[2]	Yes, Long-Term Moderate-Significant Beneficial Impact (elimination of truck traffic future option)
Results in short- or long-term impacts as a result of Regional NOx and/or VOC increases? Any anticipated Impacts?	Yes, Long-Term Negligible to Minor Adverse	Yes, Long-Term Negligible to Minor Beneficial	Yes, Long-Term Negligible to Minor Beneficial
Results in GHG emissions above established standards? Any anticipated impacts?	No, None	No, None	No, None

1 - Based on implementation of the mitigation/protective measures described in Section 2.6.2.6 and 2.6.3.6.
2 – Long-term moderate to significant adverse impact from cargo trucks would be eliminated should the future removal of all commercial cargo traffic be implemented. This is considered to be a long-term moderate to significant beneficial impact.