



# San Ysidro Port of Entry Expansion Project San Diego, CA

## Section 106 Consultation

October 2008





October 10, 2008

Mr. M. Wayne Donaldson  
State Historic Preservation Officer  
California Department of Parks & Recreation  
Office of Historic Preservation  
1416 9th St, Room 1442-7  
Sacramento, CA 95814

Attn: Ms. Susan Stratton

Re: San Ysidro Port of Entry Expansion Project, Section 106 Consultation

Dear Mr. Donaldson,

The US General Services Administration (GSA) is planning to expand and reconfigure the existing facilities at the San Ysidro U.S. Port of Entry (POE). This project is considered an undertaking subject to review under Section 106 (36 CFR Part 800) of the National Historic Preservation Act (NHPA).

#### **PROJECT DESCRIPTION**

The San Ysidro Port of Entry Border Station, located between San Diego, CA and Tijuana, Mexico, is the busiest port of entry in the United States. The San Ysidro Port of Entry houses the Department of Homeland Security – Bureau of Customs and Border Protection (DHS – CBP) and functions as the inspection point for privately owned vehicles and pedestrians entering and leaving the U.S. As currently configured, the existing POE is insufficient in both space and design to handle the increasing pedestrian and vehicular traffic moving through the facility. The northbound vehicle wait-times at the Port are routinely 45 minutes and can reach up to two hours in length during peak traffic times. Moreover, DHS is implementing programs both to increase security and to improve the flow of traffic at the U.S. borders. These programs require an increase in staff, space, and systems that cannot be accommodated in the current border station configuration (Fig 1).

In order to meet the increased traffic demands and new security programs, GSA is proposing to expand and reconfigure the existing border station, which will include the demolition of some existing buildings and the construction of some new buildings. Most significantly, this project could include the demolition of the old U.S. Customs House, a National Register listed property. GSA has carried out master planning studies of the site and has chosen a preferred master plan for the site (Fig 2).

#### **AREA OF POTENTIAL EFFECT**

We have determined that the Area of Potential Effect (APE) for this project encompasses the approximately 30 acres bordered by the U.S./Mexico international border to the south, Virginia Avenue to the west, and Camino de la Plaza to the north. On the east side, the APE is bordered by East San Ysidro Blvd and the railroad tracks (Figs 3-4)

### *Structures*

Within the APE, there are fourteen structures (Figs 5-6):

1. Old U.S. Custom House (GSA owned)
2. Main Building (GSA owned)
3. Greyhound bus station
4. Payless Shoes store
5. Duty Free America
6. Former Border Patrol building
7. Railroad shed
8. International building
9. Mercado Internacional
10. San Diego (McDonald's) Trolley Station
11. San Diego Trolley
12. Baja Duty Free
13. Check cashing booth
14. Commercial building

One building, the old U.S. Custom House, is listed on the National Register of Historic Places (NRHP). The San Ysidro Main Building was constructed in 1972-1973. Five others (Railroad Shed, Greyhound bus station, Payless Shoes store, International building, and Mercado Internacional building) are visible in the 1964 aerial view of the border station and thus likely over 50 years old. The nine remaining structures are likely under 50 years old.

### *Archaeology*

A study completed in 2004 by Mooney & Associates<sup>1</sup> included site records searches at the South Coast Information Center and the Museum of Man and an onsite survey (Appendix A). The site records search indicated that site CA-SDI-5555 was located immediately east of the project site (which at that time extended only to the western side of the old Custom House). However, as Mooney states, CA-SDI-5555 was a site originally recorded in 1978 as part of a survey for the then-proposed trolley station, but in a 1992 survey by Gallegos and Associates determined that the site had been destroyed by landform alteration. Eight other sites and two isolate artifacts were identified in the project vicinity. Onsite surveys by Mooney & Associates in 2000 and 2003 did not identify any further prehistoric resources.

### *Native American Consultation*

The 2004 Mooney & Associates study includes correspondence from Richard L. Carrico of Mooney & Associates to Rob Wood at the Native American Heritage Commission (NAHC) requesting a review of the NAHC Sacred Lands files for the project area. Mr. Carrico also states that in both 1997 and in 2000, when studies were conducted in the immediate area, the local Kumeyaay community did not identify any sensitive or sacred resources. No response from Mr. Wood is included in the study.

## **ELIGIBILITY FOR THE NATIONAL REGISTER OF HISTORIC PLACES**

### *Structures – Preliminary Analysis*

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<sup>1</sup> Mooney & Associates, *Historic Properties Survey Report for the San Ysidro Border Station Expansion*, San Diego County, California, 2004.

We are currently studying the buildings in the APE further. However, our preliminary analysis of these buildings is that of the nine buildings that are not yet 50 years old, none are potentially eligible for the NRHP. Of the five buildings that are likely over 50 years old, we believe that one building (International building) may be potentially eligible for the NRHP at the local level.

### *Archaeology*

Archaeological records searches and onsite surveys have not identified any eligible sites in the project area. Thus, we have determined that this project site has low potential to yield information important to history or prehistory.

### *The Old U.S. Custom House*

The old U.S. Custom House was constructed in 1932-1933 and was listed on the National Register of Historic Places in 1982 at the local level of significance for architecture and politics/government (Appendix B). However, we feel that as it stands today this building has lost a great deal of integrity. This building derives much of its significance from its relationship to the border, but it is questionable whether this building retains any relationship with the U.S. side of the border. With the defensive and commercial buildup around the border station, the building is barely visible from the U.S. side of the border. Persons using the building now primarily approach from the north side via a service driveway, and no view of the front façade is available from this angle (Fig 7). The building is now primarily visible from Mexico.

The San Ysidro border crossing has grown so quickly since the 1930s that construction efforts to alleviate border congestion have reached capacity sometimes as soon as ten years after completion. The current 1933 old Custom House was an upgrade and expansion over a former wood frame building that was formerly on site (Fig 8). After the construction of the 1933 building, which could accommodate three lanes of vehicle traffic and pedestrians (Fig 9), the port was again expanded in 1960 to accommodate 17 lanes of vehicle traffic (Fig 10). The port was expanded again in 1973 to its current configuration, which can accommodate 24 lanes of vehicle traffic.

The 1960 border station expansion project was the first to have a significant impact on the old Custom House. The project included the construction of a new Custom House (presumably demolished in 1973), a large canopy over inspection lanes, and a new secondary inspection building. The porte-cochere of the old Custom House was removed, and an elevated pedestrian bridge from the secondary inspection building was installed, causing significant alterations to the main façade of the building (Fig 11). Considerable alterations were also made on the interior of the old Custom House. The main stair and most interior partitions were removed from the first floor of the central wing, a new stairway was added where the pedestrian bridge entered the buildings, and search and detention rooms were added to the north wing (Fig 12).

The 1973 border station project expanded the footprint of the border station significantly. Minimal work was done on the interior of the old Custom House, but in an effort to integrate the old Custom House in to the larger ensemble of border station buildings and to close a gap in the border station control line, the old Custom House was joined to the San Ysidro main building with a 12 ft high wall (Fig 13). Over time, the wall has been extended on the east side of the old Custom House, making the building effectively part of the border defensive wall, and as such the old Custom House is the "weak link" in the border wall. The building has suffered significant damage from people crossing the border illegally by climbing the border wall and running across the roofline of the building before jumping down onto the U.S. side of the wall. Cracked and shattered roof tiles as well as dented and damaged copper gutters are evidence of this activity (Fig 14).

Given these significant changes in setting and the substantial alterations to the building, we believe that a visitor to the San Ysidro border station would be hard pressed to experience a connection with the architecture of the building or history of the border crossing as embodied in the old U.S. Custom House. When this building was nominated to the NRHP in 1982, the building was essentially in the same deteriorated condition, and we feel that even at that time it is questionable that the building retained enough integrity to be eligible for the NRHP. Since that time, traffic and security issues at San Ysidro have expanded logarithmically, further changing the context of old U.S. Custom House.

In order to balance the expanding needs of the border crossings with preservation and stewardship goals, GSA has begun a thematic study of all historic border stations. GSA is looking at these historic border stations in the larger context of the entire northern and southern borders, with the goal of prioritizing the preservation and maintenance of those historic border stations that are in the best condition to express the history and context of the international border between the United States and Mexico. The place of the San Ysidro old U.S. Custom House in this larger study is discussed below in "Alternatives."

#### **UNDERTAKING, DETERMINATION OF ADVERSE EFFECT**

The goals of the San Ysidro POE expansion project is to incorporate the latest security and antiterrorism enhancements to improve passenger and vehicular processing, increase operational efficiency, provide greater officer and public safety, decrease operations and maintenance costs, and improve the traveler experience. This project will also consolidate many spaces that became redundant when three separate border enforcement agencies were combined into one agency under the Department of Homeland Security.

In addition to fulfilling the mission of the border crossing, the project team has worked closely with local business and community groups to consider the relationship of the POE with the community of San Ysidro. As an outcome of this collaboration, requirements were increased for pedestrian movement through POE and a number of potential commercial development opportunities were identified at the northern end of the project site. Although these commercial developments are not part of the San Ysidro POE project, state and local organizations may carry out these projects, we consider them to have potential indirect effects (Fig 15-16).

The project consists of the demolition and new construction of most of the POE, including the main buildings (primary and secondary vehicle inspection, administration, and pedestrian inspection) and other support structures. In addition, a new southbound roadway with inspection facilities will be constructed to connect with Mexico's El Chaparral facility. Two additional southbound pedestrian access points will also be added. The expanded facility will consist of 225,000 square feet of building space, 29 inbound vehicle lanes, two bus lanes, and six outbound vehicle lanes. The project is currently scheduled to be constructed in three phases, possibly commencing in 2010.

Significant elements of the San Ysidro expansion project:

- The old Main Buildings (1973) would be demolished as part of this project and replaced by new replacement buildings. However, we have determined that the old Main Buildings are not eligible for the NRHP, and thus there is no adverse effect with this portion of the undertaking.
- The Duty Free America (1999) and former City of San Diego property (1970s) would be demolished as part of this project. However, we have determined that the Duty Free

America and City of San Diego buildings are not eligible for the NRHP, and thus there is no adverse effect with this portion of the undertaking.

- There would be substantial underground disturbance with construction of subterranean parking and subterranean central detention. However, we have determined that this project site has low potential to yield information important to history or prehistory, and thus there is no adverse effect with this portion of the undertaking. The project will follow procedures outlined in *GSA ADM 1020.2 Procedures for Historic Properties* in the case of post-review discoveries.
- Currently, the planned location of the facility Central Plant is on the east side of the project site. This is considered the best location for efficient delivery of power to the POE buildings with minimal piping and cabling distance. Construction of the Central Plant at this location would require the demolition of the Greyhound station and the Payless Shoes building. Our preliminary determination is that these buildings are not eligible for the NRHP, and thus there would be no adverse effect on these buildings. However, placing the Central Plant adjacent to the potentially eligible International building may cause an adverse effect by changing the setting of the commercial strip. Further study of these buildings is being carried out concurrently as part of the preparation of an Environmental Assessment for this project.
- The San Ysidro Community Relations Committee requested additional southbound pedestrian accommodation at the east side of the POE, and this has been integrated into the project master plan (Fig 17-18). Northbound pedestrian flow is already located at the east side of the project site, and the addition of southbound pedestrian flow at this location causes potential conflict between northbound and southbound pedestrians. The project team has proposed demolition of the old U.S. Custom House in order to accommodate both northbound and southbound pedestrian access. The old U.S. Custom House is listed on the National Register of Historic Places. We have applied the Criteria of Adverse Effect found in 36 CFR §800.5 and determined this undertaking will have an adverse effect to historic properties.

## ALTERNATIVES

### 1. Renovate old U.S. Custom House and leave in place

Renovating and seismically upgrading the old U.S. Custom House would allow the building to retain its historic location and possibly allow for restoration of some of the elements that have been altered or removed over time. However, developing program elements to occupy space in the renovated old U.S. Custom House has been challenging. The building is currently underutilized, with the north wing in use as a maintenance facility and part of the first floor in use as offices. The remainder of the building is used for storage. One of the goals of the port expansion project is to consolidate redundant spaces, bringing program spaces into as tight an envelope as possible and allowing for reduced staffing and operating costs. Moreover, in order to accommodate southbound pedestrian access at this end of the POE while still retaining the old Custom House, a path of travel would have to be carved into the hillside behind the building. The creation of the path would require a great deal of landscape cut and fill, at large expense to the project. Overall, the project team feels that the benefits derived from renovating the historic building in place do not outweigh the additional costs added to the project.

### 2. Move old U.S. Custom House to new location

In 2008, GSA commissioned a study to consider three options for moving the old Custom House to a different location on the project site. The full text of this study can be found in Appendix C, but in summary:

*Option 1 – Move 45 feet east, 6 feet above*

This option would move the building slightly uphill and away from the vehicle lanes. It presents the least impact to the building's integrity. However, because the building is not moving very far and the port continues to grow in size, it is likely that the site will become constrained again in the future. Moving the building east also requires significant regrading of hill behind the building.

*Option 2 – Move 270 feet northwest*

This option would move the building to a site adjacent to the art deco style "International" building, requiring the demolition of the Greyhound station and the Payless Shoes building. This option presents the greatest possibility for reuse of the building, however it presents the greatest impact on the integrity of the old Custom House. Choosing this site for the building would also displace the Central Plant in the master plan. The project team considers this the preferred move option.

*Option 3 – Move 168 feet east, 44 feet above*

This option would move the building to the top of the hill behind it, to the site currently occupied by the Railroad Shed. This is the most difficult and costly option, essentially requiring the building to be lifted 45 feet in the air and then slid east onto the hilltop. It would also require demolition of the Railroad Shed and additional funds to acquire the site. Reuse of the building would be even more difficult given the remoteness of this site from border station activities.

### **3. Demolish old U.S. Custom House**

Demolition of the old U.S. Custom House would allow for accommodation of southbound pedestrian access on the east side of the port and would allow for potential future expansion of traffic lanes to the east. The project team considers this the preferred alternative. While the possibility of demolishing a historic structure is regretful, we feel that this particular building has lost a great deal of integrity of context and is not likely to regain that context in the future. San Ysidro is an expanding port on a constrained site. Given the consistently growing needs of the border stations, GSA is taking a broad approach to its existing historic border stations. As described above in the "Eligibility" section, GSA is undertaking a thematic study of all historic border stations in the larger context of the entire northern and southern border, with the goal of prioritizing the preservation and maintenance of those historic border stations that are in the best condition to express the history and context of the international border between the United States and Mexico. As such, the San Ysidro old Custom House can be viewed in the context of the other two existing historic border station buildings in California, the old Custom House at Calexico, CA (Fig 19) and the old Inspection Station and Residences at Tecate, CA (Fig 20).

The Calexico old Customs House was built in 1932-33 and is listed on the National Register of Historic Places at the national level of significance. The Tecate Inspection Station, which includes two original border station residences, was built in 1933-34 and is listed on the NRHP also at the national level of significance. The three border stations at San Ysidro, Calexico, and Tecate were all built as part of a large federal building program administered by the Public Buildings Branch of the Department of Treasury. All border station buildings in this program were designed by the Architecture Division in

Washington D.C. and deployed along the northern and southern borders. The Architecture Division took a modular approach to these border station buildings, using standard plans for all buildings, with small variations in size and style depending on a border city's population and importance. Given this method of design, it is not surprising that the San Ysidro old Custom House is strikingly similar to the buildings at Calexico and Tecate in both style and layout.

Taken as a group, these three California historic border stations present a unified set of buildings along the southern border of the United States. Although it is the largest of these three structures, San Ysidro retains the least integrity. The Calexico building is of a very similar style, scale, and urban setting as the San Ysidro building, but it retains a great deal more integrity of layout and historic fabric on the interior. The Tecate complex, with its two associated residences, represents another type of border station, that of one in a more rural and isolated context, where border station staff would require housing onsite. It also retains a great deal more integrity than San Ysidro and has recently been renovated and successfully integrated into an POE expansion project. Given the relatively greater integrity of the Calexico and Tecate historic buildings, GSA proposes that if this alternative is chosen as a potential mitigation option would be that GSA prioritize the Calexico and Tecate historic buildings, agreeing to maintain stewardship of these buildings in the long term.

## **CONSULTATION**

We would like to bring together all parties at a meeting onsite at the San Ysidro POE to tour the facility and discuss project alternatives and potential outcomes. We are planning for a consultation meeting sometime in January or early February. We will be contacting you in the next few weeks to discuss potential dates for this meeting. In the meantime, please review the enclosed materials, and if you have any questions, please contact me at jane.lehman@gsa.gov or (415) 522-3098.

Sincerely,

Jane Lehman  
Regional Historic Preservation Officer

JL: bfr

Enclosures

Identical letters sent to:

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San Ysidro Port of Entry Expansion  
Section 106 Consultation

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