



Learning how GSA engages with stakeholders to improve border crossing facilities

What is the GSA priority?

The Bipartisan Infrastructure Law (BIL) provided the General Services Administration (GSA) \$3.4 billion to carry out 26 major Land Ports of Entry (LPOE) modernizations along the northern and southern borders of the United States.¹ One of the LPOE program's objectives is to "strengthen community livability and advance community goals" around LPOE projects.² This objective aligns with other directives to conduct community engagement (CE) that assists communities in pursuing economic development and environmental justice goals.³ While CE

goals and objectives are clearly articulated, CE as a practice has not been systematically explored at GSA.

What did we evaluate?

We partnered with the Public Buildings Service (PBS) LPOE program team to evaluate how CE currently happens at LPOE sites and what we can learn to advance GSA's CE efforts moving forward.

LPOEs are key federal infrastructure for welcoming entrants to the United States and ensuring secure but open borders. We documented CE taking place in four GSA regions to identify best practices and areas for improvement. The four LPOE modernization projects represent different construction phases and local characteristics in four GSA regions:

1. Highgate Springs (VT-Region 1),
2. Bridge of the Americas (TX-Region 7),
3. San Luis (AZ-Region 9), and

¹ "Land Ports of entry and the Bipartisan Infrastructure Law" gsa.gov, accessed June 2024. <https://www.gsa.gov/real-estate/gsa-properties/land-ports-of-entry-and-the-bipartisan-infrastructure-law>

² "Bipartisan infrastructure Law and LPOEs" gsa.gov, accessed June 2024. <https://www.gsa.gov/real-estate/gsa-properties/land-ports-of-entry-and-the-bipartisan-infrastructure-law/bipartisan-infrastructure-law-and-lpoes>

³ Joseph R. Biden Jr. Executive Order. "Advancing Racial Equity and Support for Underserved Communities Through The Federal Government, Executive Order 13985 of January 20, 2021." *Federal Register* Vol.86, no. 14 (Monday, January 25, 2021): 7009-7013. <https://www.federalregister.gov/documents/2021/01/25/2021-01753/advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government>; Joseph R. Biden Jr. Executive Order. "Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, Executive Order 14091 of February 16, 2023." *Federal Register* Vol.88, no. 35 (Wednesday, February 22, 2023): 10825-10833. <https://www.federalregister.gov/documents/2023/02/22/2023-03779/further-advancing-racial-equity-and-support-for>

[-underserved-communities-through-the-federal](#); Joseph R. Biden Jr. Executive Order. "Implementation of the Energy and Infrastructure Provisions of the Inflation Reduction Act of 2022, Executive Order 14082 of September 12, 2022." *Federal Register* Vol.87, no. 179 (Friday, September 16, 2022): 56861-56864. <https://www.federalregister.gov/documents/2022/09/16/2022-20210/implementation-of-the-energy-and-infrastructure-provisions-of-the-inflation-reduction-act-of-2022> GSA Equity Action Plan gsa.gov, accessed June 2024. https://www.gsa.gov/system/files/GSAEquityPlan_EO13985_2022.pdf

4. Sumas (WA-Region 10)

How did the evaluation work?

For this qualitative process evaluation we gathered data from project teams engaging in CE efforts at four LPOE project sites and from CE subject matter experts (SMEs) at GSA. We conducted 25 semi-structured interviews in August 2023 to better understand how CE is implemented across sites and identify best practices for nationwide peers and regional and national agency leadership⁴.

We interviewed CE practitioners from project management teams, the National Environmental Policy Act (NEPA) program, and the Office of Strategic Communications (OSC) who are embedded in regional offices. We also conducted interviews with GSA Central Office SMEs, from the NEPA program, the Center for Urban Development (CUD), and the Southern Border LPOE Program. Given its scale and public profile, we interviewed more staff working on the Region 7 Bridge of America's (BOTA) project for interviews and also interviewed building managers, project managers, a project executive, and a local consular official.

All interviews were recorded, transcribed, and coded thematically using a coding rubric and codebook.

What did we learn?

We discovered two main themes from our analysis of CE in the four LPOEs.

- CE practitioners and practices vary widely across regions. This has allowed for innovation to develop in some

regions (Region 9 and Region 1), but results in different types and levels of engagement at LPOEs.

- Outside the mandatory, highly structured NEPA public engagement process, it is unclear how PBS uses CE to inform project design, revealing opportunities for both future program improvements and further evaluation.

CE is performed by project managers, NEPA and communications staff, and contractors prior to and throughout construction projects. BIL funds have increased the volume and pace of PBS construction projects, presenting an opportunity to compare regional CE capacity and highlight areas for replication and improvement.

Region 9's LPOE leadership has leveraged CUD expertise to develop CE practices that other regions look to as models for success. These include assembling local committees to advise project teams and cultivating long-term relationships with community leaders so that projects have local champions early in the process. These practices help minimize conflict and challenges. Adoption of Region 9's best practices by other regions occurs ad-hoc through a culture of sharing and learning within PBS, but not in a more formal or standardized way.

⁴ See [Appendix](#): LPOE Community Engagement evaluation interview guides for details.

“ I find that, if I don't have a resource or I need something, I'm fairly confident that I can reach out to somebody and get it. Either have them help me directly or just as a resource, just talking. ...within GSA, there's always going to be somebody that's gone through it that has the experience. ”

— CE practitioner

Best practices are also emerging from Region 1 through a key change to organizational structure. Region 1 is the first to hire a dedicated CE lead responsible for spearheading engagement for 10 LPOE modernizations in the region. The lead was able to initiate community outreach well in advance of groundbreaking and successfully piloted a rural outreach strategy and meeting format under consideration for use in Region 10, which has only recently begun its public outreach phase. Because Regions 1 and 10 are still developing their CE capacity, they regularly look to Central Office SMEs for guidance.

The consequence of having limited CE capacity is evident in Region 7, where CE efforts have been under public scrutiny. Opponents of the BOTA modernization are calling for GSA to replace the BOTA facility with one that excludes truck traffic, citing evidence that idling diesel engines contribute to poor air quality. With heightened interest in that issue, the community found fault with the timing and venue of CE events. The project team has learned from their early outreach efforts, but there remains a need to integrate lessons from BOTA into agency-wide CE efforts so

that they are not repeated, which we outline in our recommendations.

Across all regions, NEPA's protocols have historically formed the backbone of CE work, which means that NEPA mandates shaped how project teams think about CE and its purpose more generally. The CE activities we observed were beyond the scope and before the initiation of the NEPA process, but regions do not have (or did not share) roadmaps outlining how these activities link to PBS's CE goals for broad community improvements. This was a missed opportunity to bring the community into the fold of project design and align with best practices utilized by other federal agencies and public entities.

What do we recommend?

GSA has a strong foundation on which to continue building its CE strategies. Nearly all interviewees cited a deep bench of colleagues pitching-in to make CE successful, and reported benefiting from learning opportunities within the agency. SMEs from CUD and the NEPA program have substantial experience working with stakeholders and are dedicated to helping project teams positively represent the government.

Our interviews identified opportunities to improve CE by doing more of it, and particularly, replicating practices already being utilized in some places:

- Formally replicate Region 9's program of pre-feasibility, committee-based community advisory boards for all major projects, along with regular in-person meetings with municipal leaders, independent of construction projects.
- As in Region 1, designate a fully-devoted CE lead to liaise between

project teams, communities, other agencies, and programs and NGOs addressing local development and equity. Detaillees and interns can support this work until permanent staffing is in place.

- Expand the reach of CUD programs leveraging federal investments in GSA communities, which have already proven successful.

Our interviews identified agency-wide opportunities to build continuity and CE capacity into PBS structures, incorporate community input into project phases, and to orient CE efforts more explicitly toward community benefits.

- Infuse project management procedures with explicit CE standards and timelines in addition to that prescribed by NEPA.
- Outline a protocol for incorporating early public feedback in designs.
- Develop CE best practice guides for different needs and settings (e.g., urban, small town, remote rural, court houses, LPOEs), and oriented toward CE goals.
- Produce public-facing materials that explain GSA's construction and CE processes, their components, timelines, parameters of engagement, and the way community input factors into decisions at each stage.
- Use CE professionals to facilitate public meetings or provide all public-facing project team members with training.
- Develop communications strategies for complicated projects in close consultation with project teams.

In summary, effective and innovative approaches to CE grow from experience — and even challenges. As best practices

continue to emerge across northern and southern LPOEs, we see opportunities for all PBS regions to continue learning from each other as they make their CE efforts more frequent and more impactful.