

Highgate Springs Land Port of Entry
Final Environmental Assessment

Finding of No Significant Impact

FINDING OF NO SIGNIFICANT IMPACT

Highgate Springs Land Port of Entry Expansion and Modernization Project

Final Environmental Assessment

Highgate, Vermont

April 2025

In accordance with the National Environmental Policy Act (NEPA) of 1969 (42 U.S.C. 4321 *et seq.*), the U.S. General Services Administration's Public Buildings Service NEPA Desk Guide, and other relevant laws, regulations, and executive orders, I find that the Highgate Springs Land Port of Entry Expansion and Modernization Project, as described in the Final Environmental Assessment, is not a major federal action significantly affecting the quality of the human environment. Therefore, an Environmental Impact Statement will not be prepared. Mitigation measures will be implemented to ensure that the action avoids or minimizes potentially adverse environmental impacts.

APPROVED:  DATE: 4/23/2025

Glenn C. Rotondo
Regional Commissioner
New England Region (Region 1)
Public Buildings Service
U.S. General Services Administration

1.0 INTRODUCTION

The U.S. General Services Administration (GSA) New England Region (Region 1) prepared a Final Environmental Assessment (EA) to assess and document potential impacts resulting from the Highgate Springs Land Port of Entry (LPOE) Expansion and Modernization Project (the Project).

The Highgate Springs LPOE is located on a 16.1-acre property owned by GSA in northwestern Franklin County, Vermont. The Final EA explains the need for the Project, the alternatives that were considered to meet the need, the impacts that were identified, and how impacts will be avoided or minimized. The anticipated impacts, mitigation of impacts, and other information discussed below are from the published Final EA.

As part of a nationwide effort, GSA, with support and input from U.S. Customs and Border Protection (CBP), conducted programmatic feasibility studies for LPOEs and their operational deficiencies based on most recent LPOE Design Standard. These programmatic feasibility studies provided viable alternatives to modernize each port, correct deficiencies, and bring the facilities up to current standards (EYP, 2019). The Bipartisan Infrastructure Law passed in 2021 and allocated \$3.4 billion to GSA to undertake 26 major construction and modernization projects along the northern and southern U.S. borders. Many of the LPOEs currently managed by GSA are outdated and long overdue for modernization. Some LPOEs are operating at full capacity and have surpassed the needs for which they were originally designed.

2.0 PURPOSE OF AND NEED FOR THE PROJECT

The purpose of the Project is to improve and enhance the performance, safety, security, and efficiency of operations for cross-border travelers and federal agencies at the LPOE: CBP, U.S. Food and Drug Administration (FDA), and U.S. Department of Agriculture's Animal and Plant Health Inspection Service (APHIS).

The Project need is twofold. First is the need to increase the LPOE capacity to accommodate the projected increase in traffic along Interstate 89 (I-89) due to the expansion of the Autoroute-35 (A-35) by the Canadian government. Second is the need to facilitate and accommodate the changing operations of CBP, FDA, and APHIS by ensuring that adequate facility and infrastructure resources are available to fulfill their functions and operations.

3.0 SELECTED ALTERNATIVE AND RATIONALE FOR DECISION

GSA selected the Proposed Action as the alternative for implementation because it best meets the purpose of, and need for, the project without causing significant impacts on the resources analyzed in the Final EA.

The Selected Alternative would develop a 57-acre private property to the west of the LPOE and acquire up to 4 acres of the Vermont Agency of Transportation (VAOT) property to the south of the LPOE. Additionally, as clarified in the Final EA, approximately 4 acres of the VAOT-owned northbound portion of I-89, to the east of the LPOE, is also included in the Project area. GSA would not acquire this portion. The Selected Alternative will also include the full demolition of the existing LPOE, which will remain operational throughout construction, as well as the demolition of all structures on the private property. Though GSA considered other alternatives, they were dismissed from detailed consideration as they did not meet the operational and security needs of CBP, obstructed critical views of vehicles approaching the LPOE, and had a greater footprint and cost of implementation.

3.1 Land Acquisition

Under the Selected Alternative, GSA would develop the 57-acre private property to the west of the LPOE and acquire up to 4 acres of the VAOT property to the south of the LPOE.

3.2 Site Preparation

The Project area consists of approximately 50 acres of which around 34 acres would be permanently disturbed from the new LPOE and nearly 16 acres would be temporarily disturbed from staging of construction materials and equipment. These 34 acres of proposed permanent disturbance comprise 23 acres of currently disturbed land (built structures and landscaping) and approximately 11 acres of vegetation which would be permanently removed under the Selected Alternative. Of the 16 acres of proposed temporary disturbance, approximately 4 acres comprise currently disturbed land and the remaining 12 acres are undisturbed, vegetated areas. In addition, site preparation would include the following measures:

- Demolition: Full demolition of all existing structures on the LPOE and private property.
- Earthwork: Substantial earthwork would occur in the Project area, including excavation, grading, and cut and fill operations (DBB, 2024). General excavation would primarily involve the removal of miscellaneous fill, which would utilize conventional earthmoving equipment (track-hoes, excavator, etc.). Where bedrock is shallow, rock excavation would be required. In such cases, line/channel drilling would be utilized to limit rock overbreak. Cut depths within inspection lanes to the north of the proposed new structures would average between 3 ft and 5 ft. Isolated areas of substantial fill depths as great as 12 ft lie to the west of the proposed Commercial Building. Southeast of the proposed buildings are shallow cut and fill depths, ranging between - 2 ft and + 3 ft. Retaining walls may be needed to accommodate grade changes along the site, particularly along the western side of the site.
- Disposal: Dedicated disposal contractors would haul demolished materials and other construction debris offsite for disposal of standard materials. Because the buildings on the private property were constructed in the 1970s and 1980s, they may contain hazardous construction materials such as asbestos containing materials and lead-based paint. Any hazardous materials would be handled in accordance with all applicable regulations and would be transported and disposed of offsite by licensed disposal contractors.

3.3 Facility Construction

The Selected Alternative would include the construction of three buildings: a two-story Main Building (serving privately-owned vehicle [POV] and bus operations), a two-story Commercial Building (serving CBP commercial operations with associated FDA and APHIS programs, and GSA operation and maintenance programs), and a single-level Training Building located further away to the south of the Main and Commercial Buildings (including a firearms range-related program) [DBB, 2024]. Together, the Main Building and Commercial Building would comprise 100,000 square feet (SF), and the Training Building would be 13,000 SF.

The expanded LPOE would accommodate seven inspection lanes for POVs, two inspection lanes for buses, two inspection lanes for commercial vehicles, and one bypass lane for larger vehicles (such as snowplows). Supporting facilities would be constructed, including employee and visitor pedestrian paths, snow storage locations, helipad, return routes, up to 200 employee parking spaces, and utility connections.

3.4 Increased Building Capacity and Improved Traffic Flow

The Selected Alternative would expand the facility to a capacity that will allow the port to accommodate the projected increase in traffic along I-89 resulting from the construction of the final segment of A-35 by the Canadian government. Additionally, the Selected Alternative would ensure that adequate facility and infrastructure resources are available for CBP, FDA, and APHIS to fulfill their functions and operations, which would improve and enhance the performance, safety, security, and efficiency of operations for cross-border travelers and federal agencies at the LPOE.

The proposed site layout and design would focus on efficient traffic flow and strong visual control of the site by ensuring appropriate alignment and configuration of vehicle inspection lanes, such that views of the drivers and LPOE officials would not be obstructed.

3.5 Construction Duration

Construction of an early site package (e.g., tree clearing, demolition, site work) is anticipated to begin as early as 2025 and projected to be substantially completed by 2029. The Selected Alternative would occur in phases to ensure minimal disruption to port functionality as the LPOE is expected to operate full time during this period.

The Selected Alternative allows for optimal operational efficiency and security based on the updated site design.

4.0 EFFECTS AND MITIGATION MEASURES

GSA places a strong emphasis on avoiding and minimizing potentially adverse environmental effects. **Table 1** summarizes the potential effects and applicable mitigation measures that will be implemented to ensure the Selected Alternative will have no significant impact on the human environment.

TABLE 1. SUMMARY OF EFFECTS FROM THE SELECTED ALTERNATIVE AND MITIGATION MEASURES

Resource	Effects	Mitigation Measures and Best Management Practices (BMPs)
Land Use	<p>Direct, long-term, minor, localized and beneficial effects as the proposed development would be in accordance with Highgate zoning regulations and planning goals of the town.</p> <p>Direct, long-term, minor, localized and regional, and adverse effects through the replacement of private property with federal ownership, resulting in a loss in expected commercial and real estate tax revenue for the Town of Highgate and State of Vermont.</p>	None.
Geology, Topography, and Soils	<p><u>Geology</u> Direct, permanent, moderate, localized and adverse effects to geology from line/channel drilling of the excavated bedrock and installation of monitoring wells.</p> <p><u>Topography</u> Direct, permanent, moderate, site-specific and adverse effects to topography due to grading and leveling activities during site preparation.</p> <p><u>Soils</u> Direct and indirect, short-term, moderate, site-specific, and adverse effects to soils within permanent limits of disturbance from excavation, grading, and cut and fill operations.</p> <p>Direct and indirect, long-term, minor, site-specific, and adverse effects to soils within temporary limits of disturbance from soil compaction and vegetation clearing.</p>	<p>GSA would implement BMPs to minimize erosion and sedimentation, including temporary seeding, use of silt fencing and sediment traps, installing gravel construction entrances/exits, and other methods as determined during detailed design. Areas cleared of vegetation within the temporary limits of disturbance of the Project area would be revegetated with regionally appropriate native plant species.</p> <p>To the extent practicable, grading would be carried out such that the existing site hydrology is maintained and the import/export of fill is minimized. Existing grades would be met at the limits of work.</p> <p>The new monitoring wells would be installed by licensed well drillers who would use the best available boring techniques to avoid causing undue soil erosion and effects to bedrock geology.</p>

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Geology, Topography, and Soils (continued)	Direct and indirect, long-term, moderate, site-specific, and adverse effects to soils at the new LPOE due to permanent removal of 11 acres of soils from the Project area, resulting in increased runoff and erosion from the additional impervious surfaces.	
Water Resources	<p><u>Surface Water</u> Direct, short-term, negligible, localized, and adverse effects to surface waters and stormwater during construction-related activities from potential sediment/contaminant runoff from the Project area and accidental spills.</p> <p>Direct, long-term, negligible, localized, and adverse effects to surface waters and stormwater from increased runoff due to increase in impervious surfaces in the Project area.</p> <p><u>Floodplains</u> No effects to floodplains as the Project area does not occur in a flood hazard area.</p> <p><u>Wetlands</u> Direct, permanent, moderate, localized, and adverse effects from the filling of one Vermont Class II wetland.</p> <p>Direct, permanent, minor, localized, and adverse effects from permanent encroachment into portions of the 50-foot buffer of another Class II wetland in the Project area. The wetland itself would not be altered.</p>	<p>GSA would develop and implement a Stormwater Pollution Prevention Plan (SWPPP) to control stormwater runoff and pollutants, which would include erosion prevention, sediment control, and water quality protection measures. BMPs such as the use of drop cloths, proper storage of chemicals, and immediate treatment of spill areas with absorbents and soil removal are examples of measures that would be implemented in the event of accidental spills.</p> <p>GSA would implement mitigation measures to minimize adverse effects to wetlands, such as establishing new wetlands or enlarging the boundaries of an existing wetland to compensate for the adverse effects from the Project. Mitigation may also include payment of fees to a federal “in-lieu fee” program or mitigation bank approved by the State of Vermont.</p> <p>For the installation of monitoring wells, well drillers would not use materials or procedures which may adversely affect the public health, the drill site, and groundwater. All drilling fluids and contaminated drill cuttings, samples, or liquids would be disposed of properly. All drilling equipment which may have become contaminated during a drilling operation would be thoroughly cleaned and decontaminated before reuse. Wells would be sited such that there is no migration of contaminants into uncontaminated zones.</p>

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Resource	Effects	Mitigation Measures and Best Management Practices (BMPs)
Water Resources (continued)	<p>These wetlands were determined to provide considerable function or value by the State of Vermont based on their analysis.</p> <p>Indirect, long-term, minor, localized, and adverse effects to wetlands due to potential encroachment into the buffer zones of two Vermont Class II wetlands determined to provide considerable function or value by the State of Vermont based on their analysis, and are also classified as a vernal pool.</p> <p><u>Groundwater</u> Direct, short-term, minor, localized, and adverse effects to groundwater due to infiltration of contaminants from construction activities and installation of monitoring wells.</p> <p>Direct, long-term, minor, localized, and adverse effects to groundwater from reduced groundwater recharge in the Project area due to increase in impervious surfaces.</p>	
Biological Resources	<p><u>Vegetation</u> Direct, long-term to permanent, moderate, site-specific, and adverse effects to vegetation and associated habitat due to the destruction and removal of native plant species during construction. Such effects may also occur from the potential impacts to two vernal pools lying in close proximity to the Project area.</p> <p><u>Wildlife</u> Direct, short- and long-term, minor, localized, and adverse effects on wildlife due to the removal of</p>	<p>GSA would implement BMPs such as the installation of a silt fence around the construction site and placement of gravel for heavy vehicle transit. Other BMPs, such as construction vehicles primarily using existing roadways, would be implemented during the construction and operation of the new, modern LPOE to minimize potential adverse effects to vegetation. Adverse effects would be mitigated in disturbed areas via replanting with native vegetation following the end of construction.</p> <p>Construction vehicles would observe maximum speed limits to minimize the possibility for any wildlife-vehicle collisions. Staging and stockpile areas would be located within or immediately</p>

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Biological Resources (continued)	<p>available habitat and from construction- and operation-related disturbances.</p> <p><u>Special Status Species and Migratory Birds</u> Direct, short- and long-term, minor, localized, and adverse effects on migratory birds due to the removal of potential breeding habitat and disturbance due to noise and activity during construction and operation.</p> <p>The Project may affect, not likely to adversely affect northern long-eared bat and tricolored bat as these species have the potential to occur in the Project area due to the availability of suitable habitat. No effects to monarch butterfly.</p>	<p>adjacent to the construction footprint within the Project area to reduce the area of disturbance.</p> <p>GSA would avoid certain Project activities (e.g., tree removal, tree trimming, and demolition of structures that could have gaps/spaces/holes that may be used as roosts) between June 1 and August 15 to prevent potential effects to juvenile bats. If any federal- or state-listed species are detected during the construction phase, work would stop, and GSA would initiate consultation with the relevant agencies.</p> <p>If required, GSA would conduct brief surveys to confirm the presence or absence of migratory bird nests in the Project area. Other BMPs would be implemented, such as minimizing tree removal to the greatest extent practicable and establishing an appropriate buffer around any active nests, if any are found, to protect nests from construction-related disturbance.</p>
Utilities	<p>Direct, short-term, minor, regional, and adverse effects on utilities due to increased demands during construction activities.</p> <p><u>Potable Water Supply, Sanitary Sewer, and Wastewater Systems</u> Direct, long-term, minor, site-specific and regional, and adverse effects due to the increase in demand for water and sewer services as the new LPOE would cater to a greater number of employees and travelers, and would have expanded operations.</p> <p><u>Stormwater Management</u> Direct, long-term, minor, localized, and beneficial effects due to the operation of stormwater management systems designed to retain and treat</p>	<p>Construction crews would follow standard industry practices to minimize the chance of discovering unmarked utilities during construction work. These include:</p> <ul style="list-style-type: none"> • locating and marking utilities prior to demolition and site preparation; and • coordination with utilities providers in the event of discovery of unmarked utilities.

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Utilities (continued)	<p>stormwater runoff efficiently per latest building standards and codes.</p> <p>Direct, long-term, negligible, localized, and adverse effects from increased stormwater runoff due to increase in impervious surfaces in the Project area from the new construction.</p> <p>Energy Systems and Supply Direct, long-term, minor, site-specific and regional, and beneficial effects as the LPOE would operate energy efficient building systems that would comply with the latest standards and codes and reduce dependence on nonrenewable energy sources. The use of propane would likely be reduced at the new LPOE.</p> <p>Direct, long-term, negligible, regional, and adverse effects to the local electric utility from increase in the electrical consumption due to expanded operations at the new LPOE.</p> <p>Telecommunication Services Direct, long-term, minor, site-specific, and beneficial effects due to the installation of upgraded telecommunication infrastructure at the new LPOE.</p>	
Solid and Hazardous Materials and Waste	<p>Direct, short-term, negligible, site-specific, and adverse effects from accidental spills of hazardous materials, such as from construction vehicles or during the removal of existing fuel and other storage tanks.</p> <p>Direct, short-term, moderate, localized, and adverse effects from the generation and disposal of hazardous materials such as asbestos-containing materials (ACM),</p>	<p>Construction and demolition waste would be removed frequently to minimize contaminant runoff from standing waste. Removal and disposal of fuel and other storage tanks would be conducted using licensed contractors and all proper closure procedures.</p> <p>Accidental spills of hazardous materials (e.g., diesel fuel from vehicles, paint, solvents) would be minimized by implementing practices such as regular vehicle inspections and maintenance,</p>

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Solid and Hazardous Materials and Waste (continued)	<p>lead-based paint (LBP), and polychlorinated biphenyls (PCBs) present in the existing buildings on the private property, and the disposal of all existing fuel and other storage tanks and potential associated contamination. Such effects would also result from the generation of solid and hazardous construction and demolition waste from construction activities and the potential for contaminant runoff from standing waste (stockpiles).</p> <p>Direct, long-term, negligible, site-specific, and adverse effects from the accidental spill/leak of hazardous materials from vehicles crossing the LPOE.</p> <p>Direct, long-term, minor, localized, and adverse effects from the use of hazardous materials and generation of solid and hazardous waste at the new, expanded LPOE, including the generation of ammunition waste from the firearms range.</p>	<p>proper storage of hazardous materials, maintaining a clean working environment, and adherence to a Spill Prevention, Control, and Countermeasure plan.</p> <p>BMPs for managing ACM during demolition may include adequately wetting all regulated ACMs, sealing the material in leak tight containers, and disposing of the ACMs as expediently as practicable. Lead-safe practices would be employed during demolition.</p> <p>All brass and lead ammunition wastes would be kept separate and stored in dedicated sealable buckets which would only be utilized for wastes from the firearms range. All suitable recovered brass casings and recovered lead slugs and lead impregnated wastes would be collected and sent to an approved licensed recycling facility. 'Lead only' wastes not sent for recycling would be properly characterized in accordance with the Resource Conservation and Recovery Act (RCRA), and managed in compliance with all applicable hazardous waste storage, labeling, and disposal requirements.</p>
Traffic and Transportation	<p>Direct, short-term, minor, localized, and adverse effects due to demolition and construction activities which would disrupt traffic patterns and cause vehicle processing delays. Construction would occur in phases to minimize traffic disruption and to ensure that the LPOE is fully operational.</p> <p>Direct, long-term, moderate, localized, and beneficial effects due to the expansion and reconfiguration of the LPOE which would improve vehicle processing and traffic efficiency and reduce congestion.</p>	None.
Noise	Direct, short-term, minor to moderate, localized, and adverse effects due to demolition and construction	The firearms range would include soundproof insulation to contain noise and limit disturbance. Personnel who undergo

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	<p>activities which would result in increased noise levels in and around the Project area.</p> <p>Direct, long-term, minor, localized, and adverse effects due to the anticipated increase in traffic at the LPOE and the resulting increase in ambient noise levels.</p>	<p>training at the range would wear hearing protection to limit noise exposure.</p>
Cultural Resources	<p><u>Archaeological Resources</u> No effects to archaeological resources.</p> <p><u>Architectural Properties</u> No effects to historic properties as there are no historic properties or critical viewsheds in the Project area and the recommended area of potential effects.</p> <p><u>Native American Tribes</u> Direct, short-term, minor, localized, and adverse effects to tribal subsistence, cultural, and recreational activities from construction noise and emissions.</p> <p>Direct, long-term, negligible, localized, and adverse effects to tribal subsistence, cultural, and recreational activities from increased traffic at the LPOE.</p>	<p>GSA contractors would be provided with an Inadvertent Discovery Plan for cultural resources and human remains, which would be implemented if such materials are uncovered during construction. GSA would coordinate with the Vermont State Historic Preservation Office (SHPO) to resolve any potential adverse effects resulting from an inadvertent discovery.</p>
Socioeconomics	<p>Direct, indirect, and induced, short-term, minor, regional, and beneficial effects due to the creation of construction and related jobs.</p> <p>Direct, short-term, negligible, regional, and adverse effects to businesses due to delays in delivery of shipment during construction from increased vehicle processing times.</p>	<p>None.</p>
Socioeconomics (continued)		

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	<p>Direct, long-term, minor, localized, and adverse effects due to the displacement of a local privately-owned business.</p> <p>Direct, long-term, minor, localized and regional, and adverse effects due to the loss in expected commercial and real estate tax revenue from replacement of private property with federal property.</p> <p>Direct, long-term, minor, regional, and beneficial effects due to increase in cross-border trade between the U.S. and Canada.</p> <p>Direct, long-term, negligible, regional, and beneficial effects due to the creation of new jobs at the LPOE.</p>	

5.0 OTHER ALTERNATIVES ANALYZED IN THE FINAL EA

GSA considered, but dismissed, two other build alternatives during the alternative development process. Under the first dismissed alternative, GSA proposed to develop the 57-acre private property to the west and acquire up to 4 acres of VAOT property to the south of the LPOE (EYP, 2019). GSA's tenant agencies and their operations would be co-located within one single building, except for NII and APHIS buildings, which would function as stand-alone facilities west and south of the new Main Port Building. The POV lanes would flow east of the Main Port Building, while the bus and commercial traffic lanes would flow west of the Main Port Building. This alternative involves the construction of seven POV lanes, two commercial lanes, and two bus lanes. There would be a centralized parking space for all employees. This alternative was ultimately dismissed from detailed analysis as it did not meet the operational and security needs of CBP, and obstructed critical views of vehicles approaching the LPOE.

The second dismissed alternative is similar to the Selected Alternative in terms of building mass, orientation, and traffic/public flow (DBB, 2024). The primary difference is the proposed avoidance of all wetlands and their buffers in the area of study. By maintaining the isolated wetland, port operations and truck maneuvering clearances cannot extend north-south and, therefore, would extend east-west. This alternative was dismissed because it would encroach further west than the Selected Alternative and would require additional clearing of forested areas. The presence of steep topography to the west would limit the scope of expansion of the LPOE. Additionally, maintaining the isolated wetland would continue to visually obstruct CBP's line-of-site at the LPOE due to the density and height of the existing vegetation. This would reduce clear lines of sight from the buildings and the existing commercial traffic and raise security concerns. Due to the reasons cited above and the greater cost of project implementation, this alternative was dismissed from further analysis.

6.0 REFERENCES

- (DBB, 2024). Davis Brody Bond & Spacesmith. 2024. Prepared for the U.S. General Services Administration. Highgate Springs New Land Port of Entry, VT Wetland Impact Concept Study.
- (EYP, 2019). EYP. 2019. Highgate Springs Land Port of Entry Final Feasibility Study Report.