U.S. General Services Administration

DRAFT ENVIRONMENTAL ASSESSMENT

Norton Land Port of Entry

Norton, Vermont

September 2025

GSA

Draft
Environmental Assessment
Norton Land Port of Entry
Expansion and Modernization
Norton, Vermont

Prepared for:

U.S. General Services Administration – Region 1
Federal Building, 10 Causeway Street, 11th Floor
Boston, MA 02222-1077
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FOR
NORTON LAND PORT OF ENTRY
NORTON, VERMONT

Lead Agency: U.S. General Services Administration

Identification Number: EA25-023-00-002-1752655951

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CONTENTS

1.0 Introduction 1
1.1 Purpose and Need for the Proposed Action 1
1.2 Background 1
1.3 Proposed Project Area and Existing Facilities 2
1.4 Compliance with Relevant Environmental Laws and Regulations 3
1.4.1 National Environmental Policy Act 3
1.4.2 National Historic Preservation Act of 1966 3
1.4.3 Tribal Consultation 6
1.4.4 Clean Water Act Section 404 6
1.4.5 Endangered Species Act Section 7 7
1.4.6 Relevant Laws and Regulations 7
1.5 Public Involvement 8
1.5.1 Public Scoping 8
1.5.2 Draft EA Review 9
2.0 Project Alternatives 10
2.1 Description of the Proposed Action Alternative 10
2.1.1 Land Acquisition 13
2.2 No Action Alternative 13
2.3 Alternatives Considered but Dismissed from Detailed Analysis 13
2.3.1 Alternative 1 14
2.3.2 Alternative 2 14
2.3.3 Alternative 3 14
2.3.4 Alternative 4 14
3.0 Affected Environment and Environmental Consequences 15
3.1 Methodologies 15
3.1.1 Affected Environment Methodology 15
3.1.2 Environmental Consequences Methodology 15
3.2 Land Use and Zoning 15
3.2.1 Affected Environment 16
3.2.2 Environmental Consequences 17
3.3 Geology, Topography, and Soils 20
3.3.1 Affected Environment 20
3.3.2 Environmental Consequences 24
3.4 Water Resources 26
3.4.1 Affected Environment 26
3.4.2 Environmental Consequences 30
3.5 Cultural Resources 32
3.5.1 Affected Environment 32
3.5.2 Environmental Consequences 37

3.6 Socioeconomics 38
3.6.1 Affected Environment 38
3.6.2 Environmental Consequences 41
3.7 Traffic and Transportation 42
3.7.1 Affected Environment 42
3.7.2 Environmental Consequences 45
3.8 Visual Resources and Aesthetics (Including Lighting/Night Skies) 46
3.8.1 Affected Environment 46
3.8.2 Environmental Consequences 47
3.9 Solid Waste and Hazardous Materials 48
3.9.1 Affected Environment 48
3.9.2 Environmental Consequences 49
3.10 Utilities 50
3.10.1 Affected Environment 50
3.10.2 Environmental Consequences 50
3.11 Recreation 52
3.11.1 Affected Environment 52
3.11.2 Environmental Consequences 53
3.12 Wildlife and Habitat 54
3.12.1 Affected Environment 54
3.12.2 Environmental Consequences 57
3.13 Air Quality 58
3.13.1 Affected Environment 58
3.13.2 Environmental Consequences 60
3.14 Noise 60
3.14.1 Affected Environment 61
3.14.2 Environmental Consequences 62
3.15 Unavoidable Adverse Environmental Effects 62
4.0 Reasonably Foreseeable Actions 65
5.0 Management and Mitigation Measures 66
6.0 References 70
7.0 List of Preparers 77
8.0 List of Agencies, Organizations, and Persons Contacted 78

LIST OF APPENDICES

Appendix A – Wetlands and Waterbodies Delineation Report
Appendix B – Scoping Summary Report
Appendix C – Other Agency Consultation
Appendix D – Hydrologic and Hydraulic Study

LIST OF FIGURES

Figure 1-1. Proposed Project Area Vicinity 4
Figure 1-2. Proposed Project Area 5
Figure 2-1. Proposed Action Alternative 12
Figure 3-1. Land Use in the Proposed Project Area and Adjacent Areas 18
Figure 3-2. Zoning in the Proposed Project Area and Adjacent Areas 19
Figure 3-3. Topography in the Proposed Project Area and Adjacent Areas 22
Figure 3-4. Soils in the Proposed Project Area 23
Figure 3-5. Delineated Features in and Adjacent to the Proposed Project Area 29
Figure 3-6. Historic Resources in or Adjacent to the Proposed Project Area 36
Figure 3-7. Regional Transportation Network 43

LIST OF TABLES

Table 1-1. Relevant Laws and Regulations 7
Table 2-1: Proposed Acquisition Area 13
Table 3-1. Summary of Environmental Impact Intensity Thresholds 16
Table 3-2. Summary of Delineated Features Within the Proposed Project Area 27
Table 3-3. Percentage of Population Employed by Occupation – Norton, Vermont 40
Table 3-4. Percentage of Population Employed by Industry – Norton, Vermont 41
Table 3-5. Norton LPOE Border Crossings from 2013–2023 45

ACRONYMS AND ABBREVIATIONS

AADT	Annual Average Daily Traffic
ACM	asbestos-containing materials
APE	Area of Potential Effect
ASA	Archaeologically Sensitive Area
BMP	best management practice
CBP	U.S. Customs and Border Protection
CFR	Code of Federal Regulations
CGP	Construction General Permit
COV	commercially owned vehicle
CWA	Clean Water Act
DEC	Department of Environmental Conservation
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
GSA	U.S. General Services Administration
HRI	Historic Resources Identification
iPAC	Information for Planning and Consultation
JD	Jurisdictional Determination
LOS	level of service
LPOE	Land Port of Entry
MPDF	Multiple Property Documentation Form
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
ORC	Online Resource Center
PBS	Public Buildings Service
$PM_{2.5}$	particulate matter – 2.5 microns in diameter
PM_{10}	particulate matter – 10 microns in diameter

POV	privately owned vehicles
PSS	palustrine scrub-shrub
REC	Recognized Environmental Condition
ROI	region of influence
RVACIS	Rail, Vehicle, and Cargo Inspection System
SHPO	State Historic Preservation Office
SLR	St. Lawrence & Atlantic Railroad
SPCC	Spill Prevention, Control, and Countermeasure
SR	State Route
Uniform Act	Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970
USACE	U.S. Army Corps of Engineers
U.S.C.	United States Code
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VAST	Vermont Association of Snow Travelers
VDHP	Vermont Division for Historic Preservation
V.S.A.	Vermont Statutes Annotated
VTrans	Vermont Agency of Transportation
WMA	Wildlife Management Area
WOTUS	Waters of the United States
WWDR	Wetlands and Waterbodies Delineation Report

1.0 INTRODUCTION

The U.S. General Services Administration (GSA) has prepared this Draft Environmental Assessment (EA) to evaluate the social, economic, and environmental impacts resulting from the proposed expansion and modernization of the Land Port of Entry (LPOE) in Norton, Vermont. The Norton LPOE is owned by GSA and operated by U.S. Customs and Border Protection (CBP). The Draft EA has been prepared in accordance with the National Environmental Policy Act (NEPA) as amended, (42 United States Code [U.S.C.] § 4321 et seq.); GSA's Public Buildings Service (PBS) NEPA Desk Guide (GSA 1999); and other relevant laws, regulations, and executive orders.

1.1 Purpose and Need for the Proposed Action

The Infrastructure Investment and Jobs Act (2021) includes $3.4 billion for GSA to undertake 26 construction and modernization projects at LPOEs nationwide (GSA 2025). Many of the country's LPOEs, including the Norton LPOE, operate at full capacity, are outdated, and are long overdue for modernization, having surpassed the needs for which they were originally designed.

The purpose of the Proposed Action Alternative is to reconfigure, expand, and fully modernize the Norton LPOE. The Proposed Action Alternative would improve traffic flow, enhance safety and security, and increase the efficiency of operations at the Norton LPOE.

The Proposed Action Alternative is needed to bring the Norton LPOE facility into compliance with federal infrastructure and security requirements, and to support the CBP's mission. The existing facility does not meet CBP's operational needs due to space constraints and limitations associated with its aging infrastructure.

1.2 Background

GSA's mission is to deliver the best customer experience in real estate, acquisition, and technology services to the federal government and the American people. This includes the design, construction, management, maintenance, custody, and control of federal buildings, including most of the country's 167 LPOEs. GSA's PBS assists federal agency customers housed in GSA facilities with their workplace needs based on specific mission requirements. The LPOEs are multimodal facilities where CBP officers inspect commercial and private vehicles and pedestrians. CBP's mission is to protect the American people, safeguard America's borders, and enhance the nation's economic prosperity.

As part of a nationwide effort, GSA conducted programmatic feasibility studies for LPOEs and identified their operational deficiencies based on the CBP LPOE Design Standards. The feasibility studies provided alternatives to modernize and expand each LPOE, correct deficiencies, and meet current standards. The 2019 feasibility study for the Norton LPOE

identified deficiencies at the Norton LPOE and determined that the existing conditions do not meet the CBP Program of Requirements.

A February 2024 Pre-Design Report was commissioned by GSA that synthesized the results of the 2019 study with CBP's updated 2023 LPOE Design Standard. Preliminary alternative concepts were developed by considering the feasibility of potential solutions for factors including site limitations (e.g., wetlands, climate, and historical preservation needs) and CBP needs. These concepts were refined to develop the Proposed Action Alternative that is analyzed in this Draft EA. The Proposed Action Alternative described in this Draft EA is considered preliminary; the final layout of the modernized LPOE would be determined during the final design phase of the project (Figure 1-2). All elements of the final design would fit within the area evaluated in this Draft EA, as described in Section 2.1. GSA and CBP would finalize the layout of the modernized LPOE after the NEPA process concludes.

1.3 Proposed Project Area and Existing Facilities

Located in the northeast corner of Vermont in Essex County, the Norton LPOE is approximately 5 miles west of the New Hampshire border (Figure 1-1). The town center of Norton, population 153 (U.S. Census Bureau 2020), is adjacent to the United States–Canada border in a rural setting. The Canadian Port of Entry in Stanhope, Quebec, is approximately 1,000 feet north of the international border on VT Route 147 and is owned and operated by the Canada Border Services Agency. The Canadian Port of Entry is surrounded by rural timberland and farmland.

The Norton LPOE property is approximately 0.83 acres, including the LPOE Main Building and inspection area (7,241 square feet) constructed in 1933, and a commercial inspection truck facility (943 square feet) constructed in 1961. The Proposed Project Area consists of approximately 4.73 acres across portions of five parcels, including the existing Norton LPOE property, and represents the maximum area that would be directly affected by the expansion of the Norton LPOE (Figure 1-2).

The Proposed Project Area is bounded on the north by the United States–Canada border and the Coaticook River, and on the west by Nelson Road and the St. Lawrence & Atlantic Railroad (SLR), which crosses the Coaticook River enroute to Sherbrooke, Quebec. The area is bounded on the east by private properties and on the south by VT Route 114. The LPOE is on the parcel with the lowest elevation within the Proposed Project Area. The area around the LPOE is developed with paved roads, commercial and residential properties, the Norton Town Hall, agricultural land and timberland, and part of the Vermont Association of Snow Travelers (VAST) Trail Corridor. A Rail, Vehicle, and Cargo Inspection System (RVACIS) building and RVACIS control building, which are owned and operated by CBP, are southwest of the Norton LPOE, and these structures are located outside of the Proposed Project Area.

The LPOE Main Building is listed on the National Register of Historic Places (NRHP) (National Register Information System ID#14000603) under Criterion A, recognizing its association with events that have made a significant contribution to the broad patterns of American history. It is also listed under Criterion C as a representative example of the distinctive property type with specific character-defining architectural features (Hartgen 2024b). The commercial inspection facility is considered noncontributing, as it was constructed after the period of significance.

1.4 Compliance with Relevant Environmental Laws and Regulations

1.4.1 National Environmental Policy Act

NEPA was signed into law on January 1, 1970. NEPA requires federal agencies to assess the environmental effects of their proposed actions prior to making decisions (42 U.S.C. 4321). The primary purpose of an EA is to ensure federal agencies consider environmental impacts in their planning and decision-making. Federal agencies must prepare an EA if the action is not likely to have significant effects or when the significance of the effects is unknown.

1.4.2 National Historic Preservation Act of 1966

The potential effects of the project alternatives on historic and cultural resources are evaluated in Section 3.5 of this Draft EA, as required by NEPA and in accordance with Section 106 of the National Historic Preservation Act. These evaluations can be integrated under the NEPA analysis or done separately. For this project, GSA has elected to perform these evaluations separately. The Vermont State Historic Preservation Office (SHPO) is a project stakeholder and has been notified of the release of the Draft EA.

GSA would initiate Section 106 consultation as set forth in 36 Code of Federal Regulations (CFR) 800.3 once a preferred project alternative is identified, which typically occurs as part of evaluating public comments received on the Draft EA and developing the Final EA. Through the Section 106 consultation process, GSA would identify impacts on cultural resources and, if necessary, negotiate measures to avoid, minimize, or mitigate adverse effects. Additional detail on the Section 106 consultation process, including coordination efforts and stakeholder input, is provided in Appendix C.

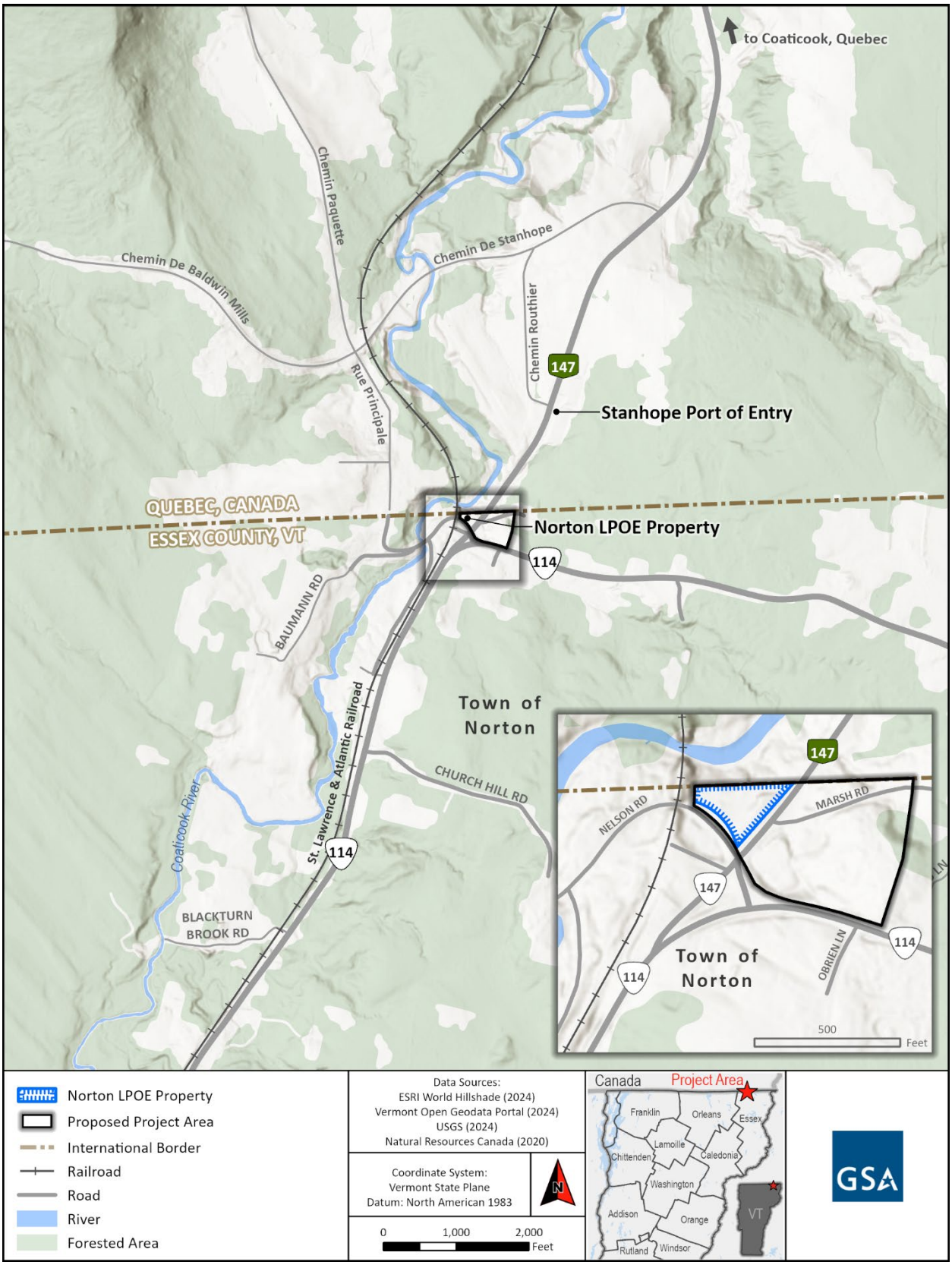

Figure 1-1. Proposed Project Area Vicinity

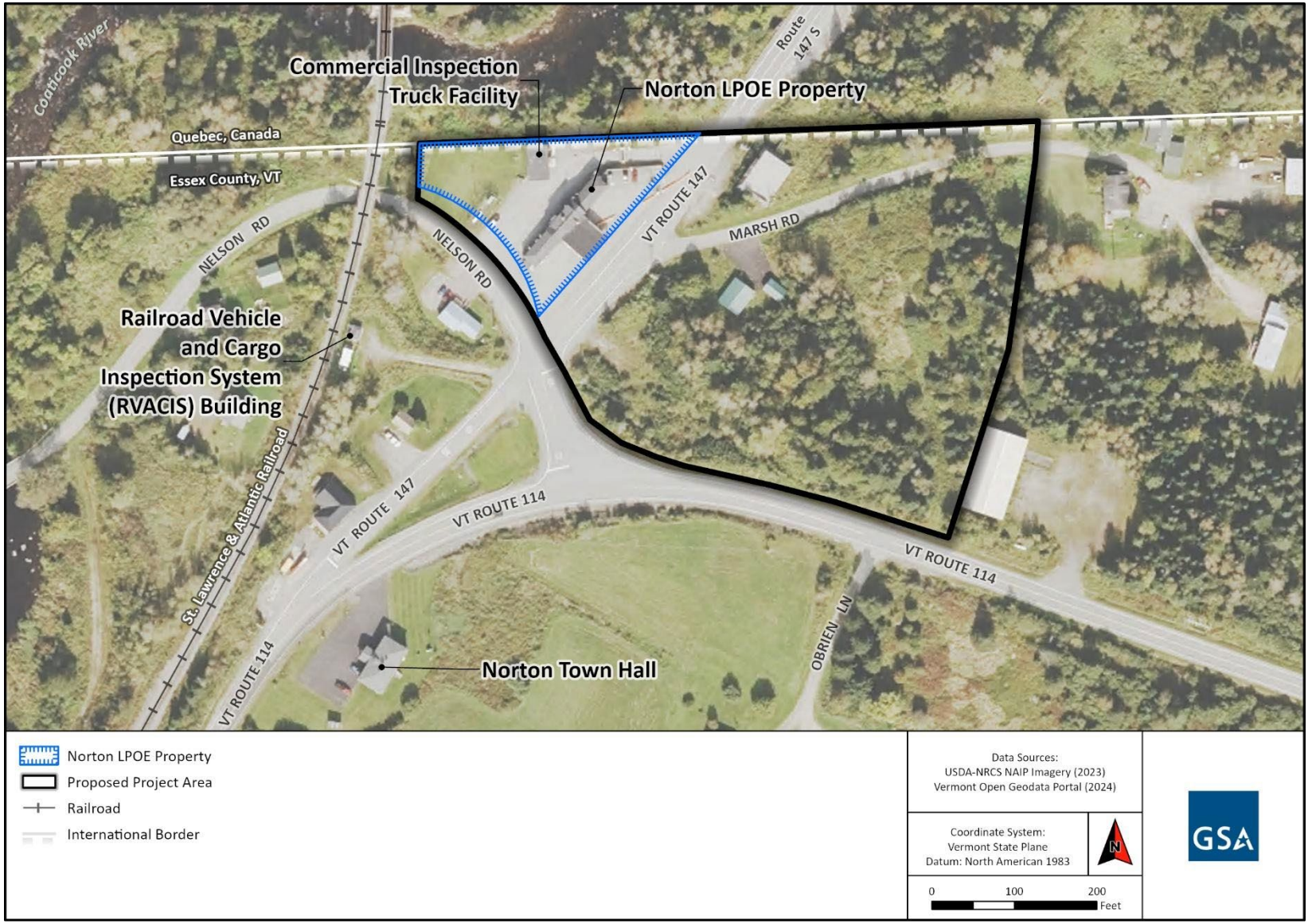

Figure 1-2. Proposed Project Area

1.4.3 Tribal Consultation

Title 36 CFR 800.2 (Participants in the Section 106 Process) requires the responsible federal agency to consult with federally recognized Tribes among other interested agencies. GSA has confirmed with the SHPO that there are no federally recognized Tribes in Vermont. Additional detail on the Section 106 consultation process, including coordination efforts and stakeholder input, is provided in Appendix C.

1.4.4 Clean Water Act Section 404

The goal of the Clean Water Act (CWA) is to achieve no overall net loss of wetlands functions and values through avoidance, minimization, and mitigation of impacts to wetlands. Section 404 of the CWA regulates the discharge of dredged or fill material into Waters of the United States (WOTUS), including wetlands and streams. Proposed activities are regulated through a permit review process. GSA would obtain the applicable Section 404 Permit, Section 401 Water Quality Certification, and Article 24 Freshwater Wetlands Permit required for the wetland and stream impacts. The U.S. Army Corps of Engineers (USACE) reviews and evaluates permits. USACE reviews individual permits and evaluates applications under a public interest review, as well as the environmental criteria set forth in the CWA Section 404(b)(1) Guidelines. USACE also conducts or verifies Jurisdictional Determinations (JD) to determine or confirm the presence of wetlands and streams. Because the Proposed Action Alternative has the potential to affect wetlands and streams, GSA must consult with USACE and the Vermont Department of Environmental Conservation (DEC).

Compensatory mitigation is required under CWA Section 404 to offset any unavoidable adverse impacts that remain after all appropriate and practicable avoidance and minimization has been achieved. Under the regulations, three mechanisms provide compensatory mitigation (listed in order of preference as established by the regulations): mitigation banks, in-lieu fee programs, and permittee-responsible mitigation. Wetland and stream mitigation would be provided in consultation with USACE and Vermont DEC pursuant to CWA Section 404 and in accordance with Executive Order 11990, Protection of Wetlands. Certain activities that may impact WOTUS require authorization under Sections 404 and 401 of the CWA. WOTUS, including federal jurisdictional wetlands and streams, are defined at 33 CFR 328.3. The USACE New England District is the agency responsible for issuing Section 404 permits in the Proposed Project Area.

Section 401 of the CWA requires a state water quality certification or waiver for any federally permitted action involving discharges into WOTUS to ensure the permitted action will not violate a state's water quality standards or impair designated uses. Vermont DEC is the agency responsible for administering Vermont's Section 401 program, as well as the Article 24 Freshwater Wetlands Permit.

1.4.5 Endangered Species Act Section 7

Section 7 of the Endangered Species Act (ESA) (50 CFR part 402) requires federal agencies to consult with the U.S. Fish and Wildlife Service (USFWS) when any project or action the agency authorizes, funds, or carries out may affect a species listed as threatened or endangered under the ESA or its designated critical habitat. An official species list, issued by the USFWS New England Ecological Services Field Office, was obtained from the USFWS Information for Planning and Consultation (IPaC) system on July 22, 2025 (USFWS 2025c; Appendix C). The list indicated that federally listed and proposed species potentially occurring in the Proposed Project Area include Canada lynx (*Lynx canadensis*), northern long-eared bat (*Myotis septentrionalis*), and monarch butterfly (*Danaus plexippus*).

Because the project has the potential to affect listed species and is being carried out by a federal agency, formal consultation with USFWS is required to ensure compliance with Section 7 of the ESA. GSA would initiate Section 7 consultation with USFWS. Refer to Appendix C for details.

1.4.6 Relevant Laws and Regulations

Table 1-1 provides a list of relevant laws and regulations that GSA must comply with as part of the project planning and NEPA processes.

Table 1-1. Relevant Laws and Regulations

Statutes
Archaeological Resources Protection Act of 1979 (16 U.S.C. § 470aa-470mm)
Bald and Golden Eagle Protection Act (16 U.S.C. § 668-668d)
Clean Air Act of 1970 as amended (42 U.S.C. § 7401, et seq.)
Clean Water Act of 1977 as amended (33 U.S.C. § 1251, et seq.)
Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (42 U.S.C. § 9601, et seq.)
Endangered Species Act of 1973 (16 U.S.C. § 1531-1544)
Energy Independence and Security Act (42 U.S.C. § 17001, et seq.)
Migratory Bird Treaty Act (16 U.S.C. § 703, et seq.)
National Energy Conservation Policy Act (42 U.S.C. § 8251, et seq.)
National Environmental Policy Act (42 U.S.C. § 4321, et seq.)
National Historic Preservation Act of 1966 (54 U.S.C. § 300101 et seq.) (89 Public Law 665 (1966))
Native American Graves Protection and Repatriation Act of 1990 (25 U.S.C. § 3001 et seq.)
Resource Conservation and Recovery Act of 1976 (42 U.S.C. § 6901, et seq.)
Safe Drinking Water Act (42 U.S.C. § 300f, et seq.)
Inflation Reduction Act of 2022 (Public Law 117-369, 136 Statute 1818)
Uniform Relocation Assistance and Real Property Acquisition Policy Act of 1970 (Public Law 91-646, 84 Stat. 1894, 42 U.S.C. § 4601 et seq.)
Vermont Land Use & Development, Act 250 (10 V.S.A. § 6001 - 6086)
Regulations
29 CFR 1910.95 – Occupational Noise Exposure

32 CFR 229 – Protection of Archaeological Resources: Uniform Regulations
32 CFR 259 – Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally Assisted Programs
40 CFR 280 Subpart F – Release Response and Corrective Action for Underground Storage Tanks Systems Containing Petroleum of Hazardous Substances
33 CFR 320-330 – U.S. Army Corps of Engineers Regulations
36 CFR 800 – Protection of Historic Properties
40 CFR 300-399 – Hazardous Substance Regulations
40 CFR 6, 51, and 93 – Conformity of General Federal Actions to State or Federal Implementation Plans
18 V.S.A. § 1331 – Vermont Asbestos & Lead
Act 250 Criteria 1A, 1D-1G – Vermont Water Resource Protections
Executive Orders
EO 11593 – Protection and Enhancement of the Cultural Environment
EO 11988 – Floodplain Management
EO 11990 – Protection of Wetlands
EO 12088 – Federal Compliance and Pollution Control
EO 13007 – Indian Sacred Sites
EO 13045 – Protection of Children from Environmental Health Risks and Safety Risks
EO 13112 – Invasive Species
EO 13175 – Consultation and Coordination with Indian Tribal Governments
EO 13287 – Preserve America
EO 13327 – Federal Real Property Asset Management
EO 13589 – Promoting Efficient Spending
EO 14154 – Unleashing American Energy
Other Guidance
Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation (48 Federal Register 44716)

Key: CFR = Code of Federal Regulations; EO = Executive Order; U.S.C. = United States Code; V.S.A. = Vermont Statutes Annotated

1.5 Public Involvement

1.5.1 Public Scoping

GSA conducted public scoping, which included hosting a scoping meeting, as part of the NEPA process. This project was initiated as an Environmental Impact Statement (EIS) with the Notice of Intent (NOI) to prepare an EIS, which established a 45-day public scoping period from January 24, 2024, to March 8, 2024. During the scoping period, GSA invited the public, agencies, and other interested parties to comment on the key topics of public concern that should be covered in the Draft EIS, examples of potential adverse and beneficial effects from the considered alternatives, and other relevant information.

GSA hosted a public scoping meeting on January 30, 2024, and 18 members of the public attended. GSA announced the public scoping period and meeting via the NOI, a newspaper

public notice, a press release, posts on the GSA Facebook page and X account, posts on the Town of Norton Facebook page, a stakeholder notification letter, coordination with the Town of Norton Clerk's office, and letters to all surrounding landowners (Appendix B).

GSA accepted comments via a comment form at the scoping meeting and via email or mail. During the public scoping period, 15 stakeholders submitted 28 individual comments, which focused largely on topics that included potential impacts to nearby property, road alignment, the need for additional data, hydrology, railroad impacts, recreation impacts, stakeholder involvement, and impacts to wetlands. The Scoping Report, including all comments received, is in Appendix B.

The project was initiated as an EIS due to anticipated impacts related to the potential closure of the Norton LPOE for approximately 24 months. However, project refinements led to the elimination of the full port closure and a smaller project footprint. These substantive changes reduced the potential for substantial environmental effects, and GSA determined that an EA would be sufficient for NEPA compliance.

1.5.2 Draft EA Review

The Draft EA is available for a 30-day public review from September 8 through October 7, 2025. An electronic copy of the Draft EA is available on the GSA website.[1] A paper copy of the Draft EA is available for review at the Norton Town Hall at 12 VT-114 East, Norton, Vermont. A public notice of the Draft EA's publication appeared in the *Burlington Free Press* newspaper on September 7, 2025, as well as in the *Newport Daily Express* and online on *Newport Dispatch* on September 8, 2025.

Interested parties can submit comments via email containing "Norton LPOE EA" in the subject line to Norton.LPOE@gsa.gov or by U.S. mail using the following address:

Adam Hunter, Norton Project Manager
U.S. General Services Administration – Region 1
Thomas P. O'Neill, Jr., Federal Building
10 Causeway Street, 11th Floor
Boston, MA 02222-1077

GSA will consider all comments received during the Draft EA public review period during the development of the Final EA.

[1] https://www.gsa.gov/about-us/gsa-regions/region-1-new-england/buildings-and-facilities/development-projects/norton-land-port-of-entry-vermont

2.0 PROJECT ALTERNATIVES

GSA is required to conduct an analysis of alternatives that meet the project's purpose and need. GSA considered a full range of reasonable alternatives and determined that there is one feasible and practicable action alternative that meets the project's purpose and need. This Draft EA analyzes one Proposed Action Alternative (Section 2.1) and the No Action Alternative (Section 2.2). The analysis of the No Action Alternative discusses the potential effects that would occur if the existing Norton LPOE continued operations. Inclusion of this analysis allows for a comparison of the potential effects with the effects of the Proposed Action Alternative. Section 2.3 describes the alternatives considered but not carried forward together with the rationale for their dismissal.

2.1 Description of the Proposed Action Alternative

The Proposed Project Area consists of the existing LPOE, commercial and vacant land, a portion of the VAST Trail Corridor, and portions of VT Route 147 and Marsh Road, along with the utility routes. The Proposed Acquisition Area is shaded pink at Figure 2-1. Under the Proposed Action Alternative, GSA would demolish the existing LPOE Main Building, acquire additional land, and design and construct a new LPOE facility within the Proposed Acquisition Area. A portion of Marsh Road would be relocated, and the VAST Trail Corridor would be extended to connect with VT Route 147. An outbound lane would be built to improve traffic flow and operational efficiency. The Proposed Project Area is bounded on the north by the United States–Canada border and the Coaticook River, on the west by Nelson Road and the St. Lawrence & Atlantic Railroad (SLR), on the east by private properties, and on the south by VT Route 114.

The Proposed Action Alternative includes the following:

- Acquisition of additional land, a portion of VT Route 147, the relocation of a portion of Marsh Road, and the extension of the VAST Trail Corridor to VT Route 147
- Preparation of the site, including full demolition and disposal of existing Norton LPOE structures, grading, and filling
- Construction and operation of a new LPOE Main Building, garage, and other support facilities
- Modernization of the design to increase separation between public and secure areas
- Construction of an enclosed area for noncommercial secondary inspections
- Reconfiguration of traffic lanes to increase transportation efficiency
- Restoration of existing infrastructure, including improved stormwater drainage

The configuration of the modernized Norton LPOE has not been established, and preliminary design work is ongoing. GSA and CBP would finalize the layout of the modernized Norton LPOE during the design phase of the project, and any design would be fully contained within the

Proposed Action Alternative and Acquisition Area, shown in Figure 2-1. The Proposed Action Alternative would not require a full closure of the Norton LPOE facility during construction. However, there may be intermittent or short-term closures of specific areas within the LPOE, temporary changes to the port's hours of operation, or the rerouting of cross-border traffic to other nearby LPOEs to ensure safety and accommodate certain construction activities. Any such changes would be communicated in advance to minimize disruption to travelers, commercial traffic, and local communities.

All facility and infrastructure improvements proposed under the Proposed Action Alternative would be designed in accordance with GSA Service Center LPOE Program of Requirements, the 2025 GSA PBS Core Building Standards, and the current CBP LPOE Design Standards. GSA would seek to meet or exceed energy performance goals established by federal guidelines and policies, as well as applicable industry-standard building codes and best practices. Various elements may include, but are not limited to, the following:

- Mandatory standards for energy design, historic preservation, accessibility, and other codes and standards
- Diversion of at least 50 percent of nonhazardous construction and demolition waste from a landfill
- Consideration of various energy sources

Section 438 of the Energy Independence and Security Act of 2007 specifies stormwater management requirements that would be incorporated into the final design of the Proposed Action. Relevant guidance includes the following:

- U.S. Environmental Protection Agency (USEPA) Technical Guidance on Implementing the Stormwater Runoff Requirements for Federal Projects Under Section 438 of the Energy Independence and Security Act (USEPA 2009)
- GSA PBS Chief Architect Memorandum on Compliance with Section 438 (Stormwater) Requirements of the Energy Independence and Security Act of 2007 (GSA 2019)

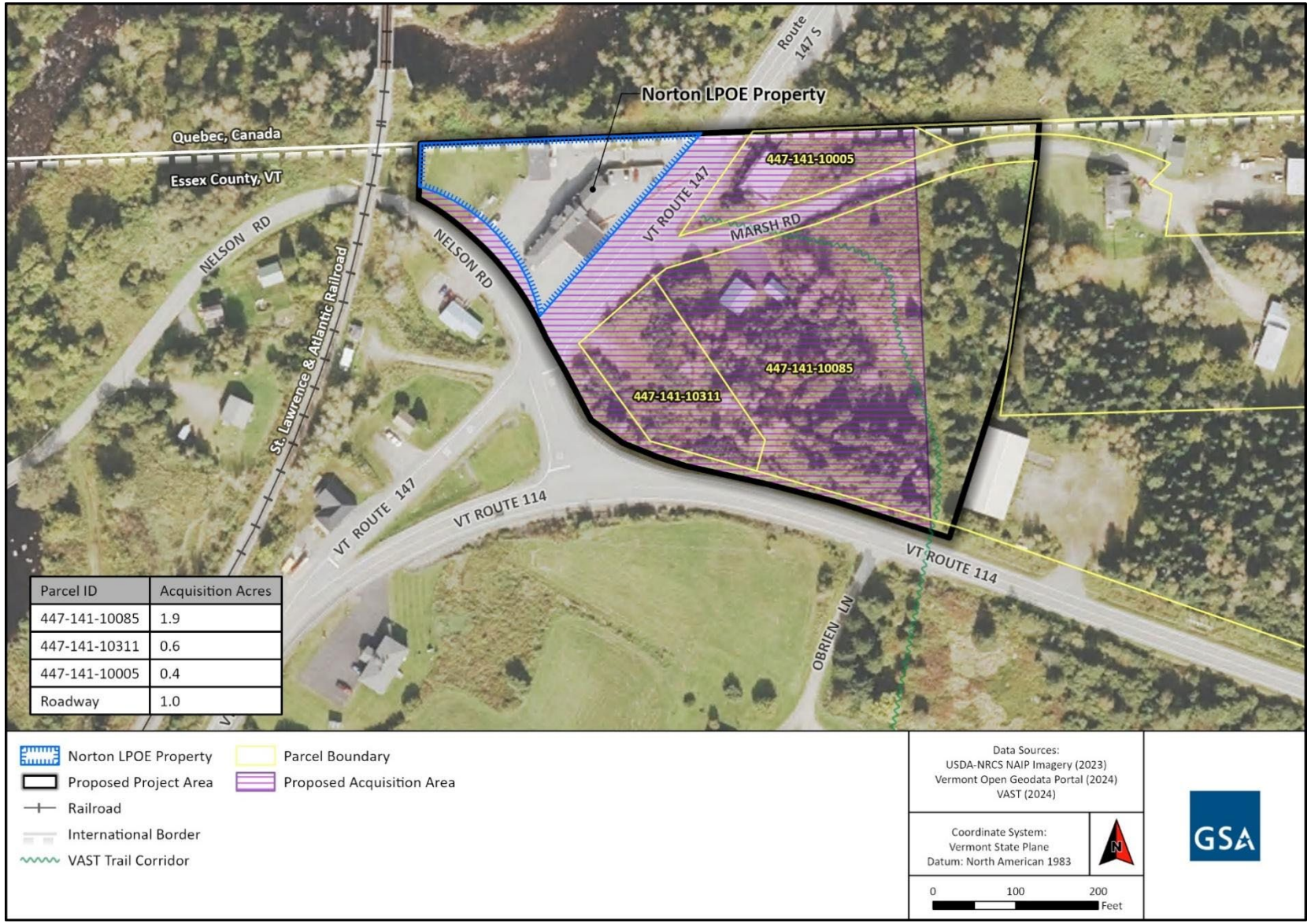

Figure 2-1. Proposed Action Alternative

2.1.1 Land Acquisition

While estimated at 3.9 acres, the total amount of land to be acquired for the Proposed Action Alternative has not yet been finalized. The Proposed Action Alternative would require the acquisition of two commercial properties with vacant buildings, vacant/unimproved land, and a portion of VT Route 147. A portion of Marsh Road would be relocated, and the VAST Trail Corridor would be extended to VT Route 147. Figure 2-1 shows the Proposed Acquisition Area shaded pink, and Table 2-1 is the approximate acreage required for the project, listed by Parcel ID.

Table 2-1: Proposed Acquisition Area

Parcel ID	Approximate Property Acquisition (Acres)
447-141-10085	1.9
447-141-10311	0.6
447-141-10005	0.4
Roadway	1.0
Total Proposed Acquisition Area	3.9
Total New LPOE Area	4.73

2.2 No Action Alternative

The No Action Alternative is included and analyzed to provide a baseline for comparison with effects from the proposed project and to satisfy NEPA's requirements for analyzing "no action."

Under the No Action Alternative, the existing facility would continue to operate in its current condition with limited and inadequate commercial and vehicle inspection and processing areas, and with no room for the expansion of workspace for staff. GSA would not construct a new Norton LPOE facility and there would be no demolition of existing facilities or expansion of operations. Current operational needs would not be met under this alternative. Structural deficiencies in the LPOE Main Building would persist and worsen, and the Norton LPOE would remain subject to flooding due to inadequate stormwater drainage infrastructure, resulting in recurring temporary closures and water intrusion into the LPOE building. Although the No Action Alternative does not meet the purpose and need for the proposed project, as identified in Section 1.1, this alternative has been carried forward for analysis and comparison.

2.3 Alternatives Considered but Dismissed from Detailed Analysis

Original design concepts were developed to address operational deficiencies at the existing Norton LPOE and meet CBP's current LPOE Design Standard and future CBP needs. GSA refined the original design concepts to minimize potential impacts to resources (e.g., wetlands, cultural resources, land use), conform to budget limitations, and address concerns expressed by stakeholders and the public during the public scoping process. The refinement process resulted in

multiple alternative design concepts, including those evaluated as the Proposed Action in this Draft EA, as well as four alternatives that were dismissed from detailed analysis.

2.3.1 Alternative 1

Alternative 1 encompassed portions of 11 parcels totaling approximately 23 acres, making it the largest alternative considered by area. This alternative was dismissed due to the extensive land acquisition that would have been required. Acquisition of this area would have necessitated substantial relocation and disruption to surrounding land uses, resulting in significant impacts to existing residential and commercial properties. From both logistical and environmental perspectives, this alternative was deemed infeasible due to the magnitude of land disturbance, potential for increased traffic congestion during construction, and high likelihood of significant adverse socioeconomic and environmental effects.

2.3.2 Alternative 2

Alternative 2, consisting of approximately 15 acres, was dismissed due to the extent of land acquisition that would have been necessary. Development of this site would have altered the existing use and resulted in considerable impacts to adjacent properties. The scale of disturbance and the logistical challenges associated with property acquisition made this alternative nonviable.

2.3.3 Alternative 3

Alternative 3 would have required the acquisition of approximately 14 acres. The required land acquisition would have resulted in substantial logistical complications, resulting in substantial impacts to existing residential and commercial properties and disruptions to existing infrastructure. Therefore, this alternative was not considered to be practicable and was dismissed from further evaluation.

2.3.4 Alternative 4

Alternative 4, totaling approximately 13 acres, was dismissed from further evaluation because it would have necessitated considerable land acquisition and resulted in associated impacts to surrounding properties. As with the other dismissed alternatives, logistical feasibility and potential environmental disturbances made this area unsuitable for meeting the project's purpose and need. The combined burden of land disturbance, infrastructure impacts, and the scope of acquisition made this alternative impracticable.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

Section 3 describes the existing environmental conditions in the Proposed Project Area and the potential environmental consequences of the Proposed Action Alternative and the No Action Alternative.

3.1 Methodologies

3.1.1 Affected Environment Methodology

The affected environment summarizes the current physical, biological, social, and economic environments of the area within the region of influence (ROI) of the Proposed Action Alternative. The ROI defines the extent of the geographic area within which effects from project-related construction and operation may be experienced. The extent of the ROI varies by environmental resource area depending upon the scope of potential impacts from the Proposed Action Alternative. For example, the geographic area of analysis for potential socioeconomic effects extends beyond the Proposed Project Area to encompass town- or regional-level analysis, while the ROI for other resources such as geology, topography, soils, and cultural resources is generally contained within the Proposed Project Area.

3.1.2 Environmental Consequences Methodology

The impacts analysis considers potential impacts on resources from the Proposed Action Alternative and the No Action Alternative. The analysis describes the types of impacts that would occur and assigns significance criteria.

3.1.2.1 Types of Impacts

The terms “impacts” and “effects” are used interchangeably in this document**.** Effects resulting from a Proposed Action can be either adverse or beneficial.

3.1.2.2 Impact Intensity Thresholds

The intensity of potential impacts is systematically analyzed in terms of duration, magnitude, and geographic context. Definitions for intensity thresholds are provided in Table 3-1. Proposed management and mitigation measures that GSA would take to avoid, minimize, or mitigate potential adverse effects of the Proposed Action Alternative are presented in Section 4.

3.2 Land Use and Zoning

This section describes the baseline conditions for land use in and surrounding the Proposed Project Area. Land use is described by land activities, ownership, and the management plans of governing entities. Local zoning defines land use types and regulates development patterns.

Table 3-1. Summary of Environmental Impact Intensity Thresholds

Duration	
Temporary	Impacts generally occur during construction, with the resources returning to pre-construction conditions almost immediately once construction is complete.
Short-term	Impacts could continue for approximately three years following construction.
Long-term	Impacts would require more than three years to recover but eventually would recover to pre-construction conditions.
Permanent	Impacts could occur as a result of activities that modify resources to the extent that they may not return to pre-construction conditions, such as with the construction of an aboveground facility.
Magnitude	
Negligible	The impact is not measurable or discernible from current conditions.
Minor	The impact is slight but detectable.
Moderate	The impact is readily apparent, and there would be a noticeable and measurable change from current conditions.
Major	The impact is severe, significant, and highly noticeable; major impacts may be above a threshold of significance.
Geographic Context	
Site-Specific	Impacts are limited to the Norton LPOE and Proposed Project Area.
Local	Impacts extend beyond the Proposed Project Area, affecting the town of Norton and areas in the vicinity of the Proposed Project Area.
Regional	Impacts affect a larger area such as Essex County and other nearby communities.

3.2.1 Affected Environment

The ROI for land use is the existing Norton LPOE, the Proposed Project Area, and adjacent properties. The Norton LPOE is in Essex County in northeastern Vermont, directly adjacent to the United States–Canada border. The surrounding landscape is rural in character, primarily consisting of forested lands, open fields, and low-density residential development. The Proposed Project Area is located along VT Route 114 and VT Route 147, which are two-lane rural highways that serve as primary transportation corridors in the area and provide direct access to the Norton LPOE. Additionally, a Flood Hazard Overlay District runs through the northeast portion of the Proposed Project Area, crossing Marsh Road.[2] Adjacent land uses include private residential properties, undeveloped woodland, and limited commercial or institutional

[2] The area defined as Flood Hazard Overlay District, as shown in Figure 3-2, is part of a county-level zoning designation and does not reflect a delineated, modeled, or Federal Emergency Management Agency (FEMA)-designated floodplain. The overlay is a precautionary zoning tool used by Essex County and is not based on site-specific hydrologic or hydraulic studies. As such, it should not be interpreted as an indication that the Proposed Project Area is subject to actual flood risk as defined by federal floodplain mapping.

development typical of a small rural border community (Figure 3-1). The Canadian Port of Entry, located directly north of the existing Norton LPOE, is part of the contiguous border operations.

The Proposed Project Area totals approximately 4.73 acres. All parcels within the Proposed Project Area are zoned as rural residential (Town of Norton 2019) (Figure 3-2). This zoning allows for low-density development.

3.2.2 Environmental Consequences

3.2.2.1 Proposed Action Alternative

No development is proposed within designated flood hazard or overlay districts, and the project is not expected to conflict with the intent of local land use planning and zoning. It aligns with existing uses and would not result in substantial changes to land use in the vicinity of the study area. Therefore, the Proposed Action Alternative would have no effects on land use or zoning.

Relocation of Marsh Road would result in a permanent, minor, localized, adverse shift in land use within the immediate Proposed Project Area. The realigned roadway would cross portions of the parcels proposed for acquisition, converting small areas of previously undeveloped or low-density use land to transportation infrastructure. This change is consistent with the existing rural transportation network. The relocated road would continue to serve local traffic and maintain access for nearby landowners and travelers. GSA would coordinate with landowners and business owners to maintain access to their properties during and after construction. Overall, the change in land use associated with the road realignment is minor and compatible with surrounding land uses and zoning.

3.2.2.2 No Action Alternative

The No Action Alternative would have no effects on land use or zoning, as GSA would not modernize or expand the Norton LPOE. Routine repairs and maintenance of the existing facility would be conducted, and the Norton LPOE would operate under the existing conditions.

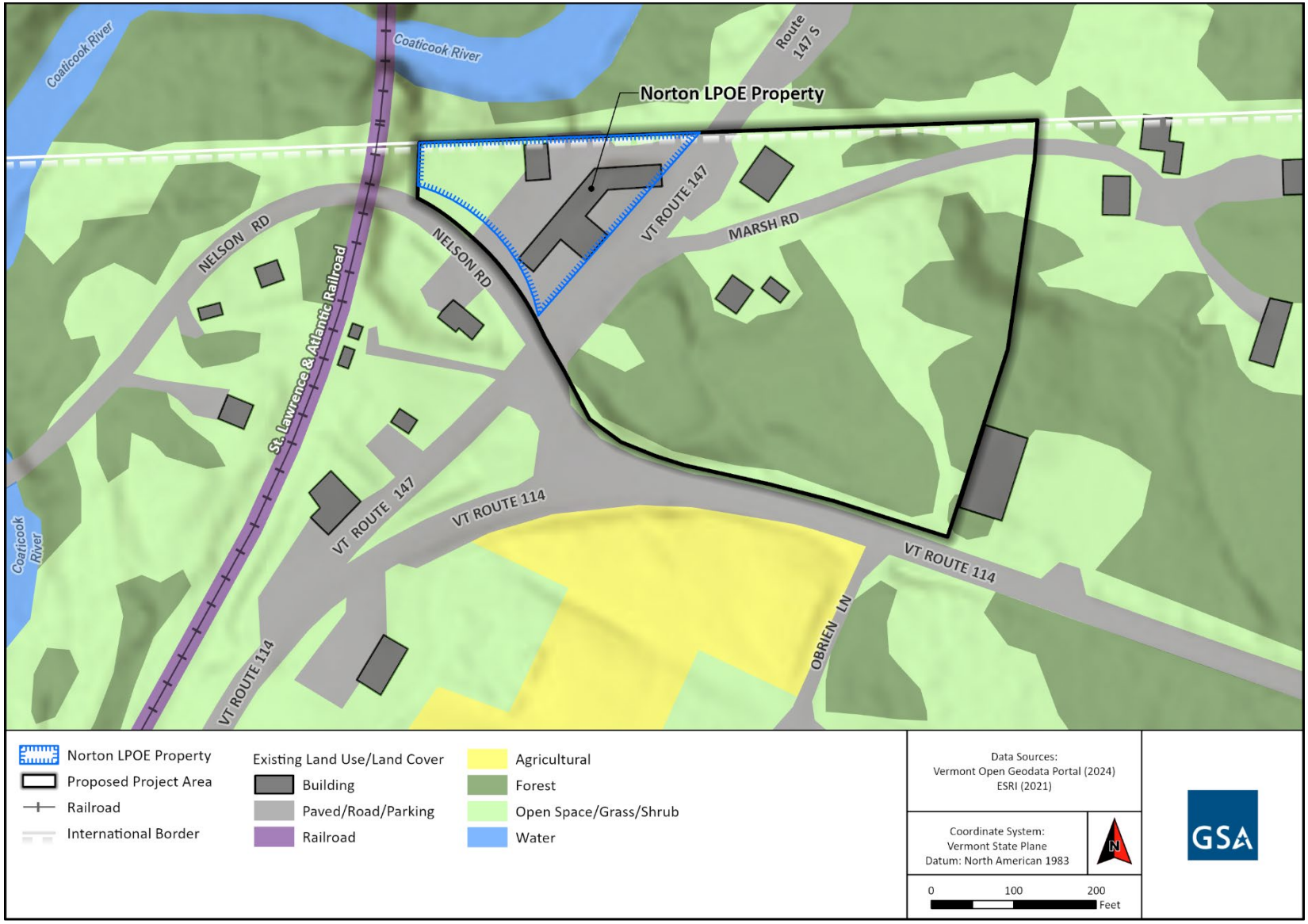

Figure 3-1. Land Use in the Proposed Project Area and Adjacent Areas

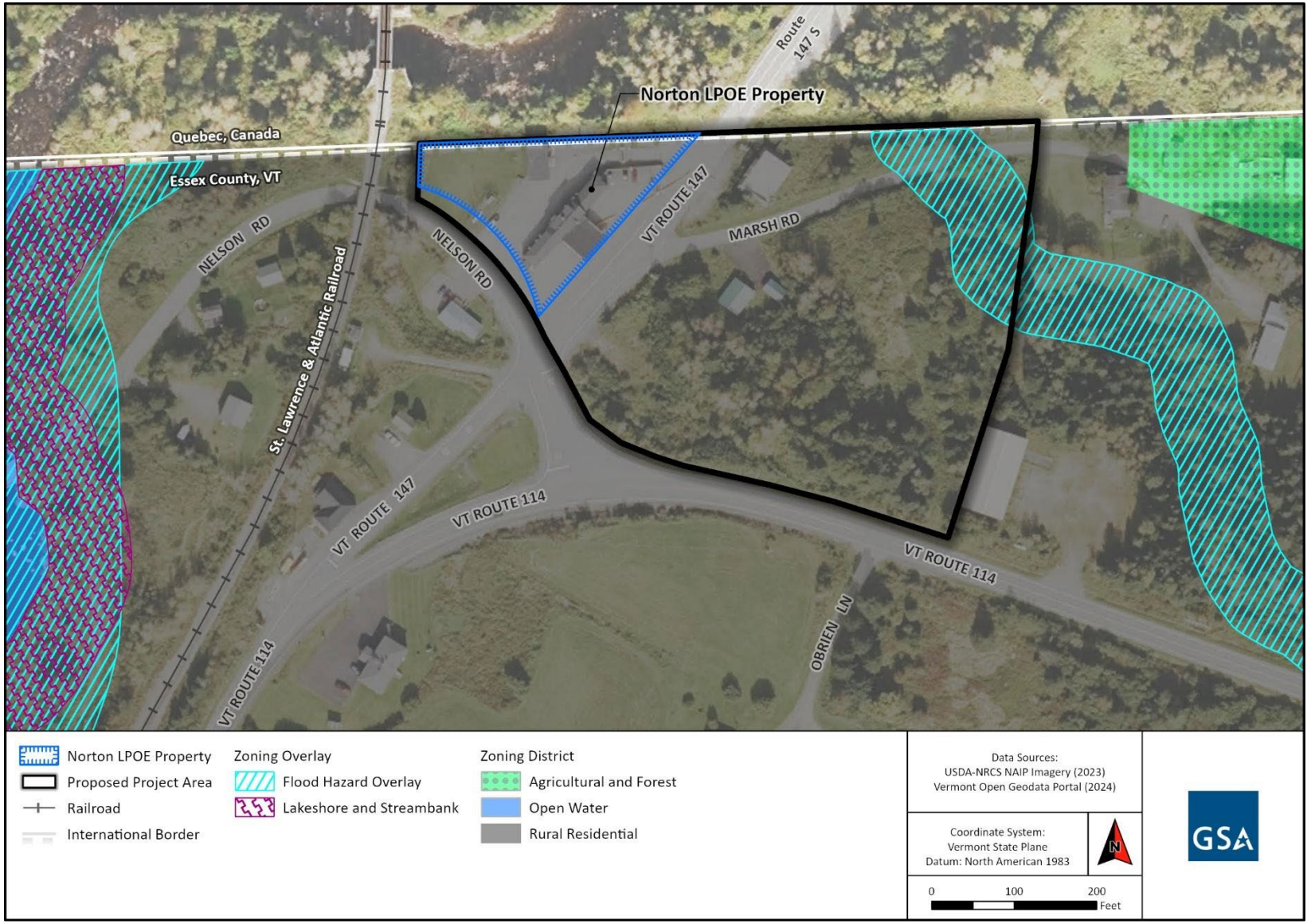

Figure 3-2. Zoning in the Proposed Project Area and Adjacent Areas

3.3 Geology, Topography, and Soils

This section describes geological resources in the Proposed Project Area and potential geological impacts that could result from implementing the Proposed Action Alternative and No Action Alternative. Geological resources consist of the Earth's surface and subsurface materials and are typically described in terms of geology, geologic hazards, topography, and soils. Geology is the study of the Earth's physical structure and composition, as well as the configuration of the surface and subsurface features. Geologic hazards (e.g., earthquakes) are natural geologic events that can endanger human lives and threaten property. Topography describes the general shape and arrangement of the natural and artificial physical features of a land surface. Soils are the unconsolidated material overlying bedrock, and are typically described in terms of type, slope, and physical characteristics, such as permeability, strength, and erosion potential.

3.3.1 Affected Environment

3.3.1.1 Geology

The geology, topography, and soils ROI includes the existing LPOE facility and the areas proposed for potential construction activities under the Proposed Action Alternative. The regional geologic pattern of the Proposed Project Area includes the Averill quadrangle. The Averill quadrangle lies in the Northeastern Highlands of the Appalachian system in Vermont, which is mountainous and heavily forested (Myers 1964). Found within the quadrangle is Averill pluton[3] (WSP 2024a). Averill pluton is part of a belt of middle Paleozoic[4] metasediments[5] that extends from the Gaspé Peninsula in Quebec to east-central Vermont (Myers 1964).

There are no producing oil or gas wells in Vermont, and no mining operations are recorded in the town of Norton (Vermont Geological Survey 2024). The nearest mines to the Proposed Project Area are the Norton Zinc Mine near Colebrook, New Hampshire, approximately 15 miles from the Proposed Project Area, and the H. Coe Mine near Island Pond, Vermont, approximately 17 miles from the Proposed Project Area (The Diggings 2024).

The Proposed Project Area is in a gently rolling landscape in northeastern Vermont, typical of the region's rural upland terrain. The Proposed Project Area is approximately 1,200 to 1,300 feet above sea level (Figure 3-3). The terrain across the Proposed Project Area is generally level to gently sloping, with minor variations in elevation toward the parcel edges. Surrounding lands to the east and west transition into more moderately sloped areas.

[3] Pluton is a gray to pink, medium- to coarse-grained, garnet-muscovite-biotite granite and pegmatite.
[4] The middle Paleozoic spans approximately 393 to 359 million years ago, covering parts of the Devonian period.
[5] Metasediments are sedimentary rocks that have undergone metamorphism.

3.3.1.2 Soils

Soil types within the Proposed Project Area include Cabot silt loam, 3 to 8 percent slopes; Colonel-Peru complex, 8 to 15 percent slopes; Cabot-Colonel complex, 8 to 15 percent; Wilmington-Colonel complex, 3 to 8 percent slopes; and Wilmington-Colonel complex, 0 to 8 percent slopes (Figure 3-4; WSP 2024b). All soils within the Proposed Project Area generally have loamy textures and vary in drainage capacity from moderately well drained to very poorly drained and exhibit distinct soil horizons that reflect differences in organic content, texture, and permeability with depth. Depth to bedrock typically ranges from approximately 1.5 to 5.5 feet. Steeper-sloped units, such as the Colonel-Peru and Cabot-Colonel complexes, have higher runoff and erosion potential and make up approximately 5.1 acres of the Proposed Project Area, while flatter units like the Wilmington-Colonel complex tend to retain moisture and may experience seasonal saturation. Overall, these soils reflect a landscape with variable drainage and slope characteristics, which may influence surface water movement and vegetation patterns.

According to the U.S. Department of Agriculture, Natural Resources Conservation Service Web Soil Survey, the predominant soil types within the Proposed Project Area include the Colonel-Peru complex and the Cabot-Colonel complex.[6] While the mapped soils suggest a potential for steeper slopes regionally, the actual site conditions are moderate and conducive to construction with minimal grading or earthwork.

All soils in the Proposed Project Area are classified as hydric (WSP 2024b). Hydric soils are formed in areas that are saturated, ponded, or flooded long enough to support vegetation that is adapted to grow in wet and low-oxygen conditions (USDA-NRCS 2024). Additionally, undersized culverts in the Proposed Project Area result in poor drainage, which creates issues related to soil erosion and sedimentation.

There are no soils within the Proposed Project Area classified as prime farmland, farmland, of statewide or local importance, or unique farmland. The site does not support any specialty crop production and is not actively managed for agricultural purposes (USDA-NRCS 2025).

[6] Although these units are typically associated with steeper terrain, soil survey data is generalized and may not reflect localized variations in topography. Field observations and site-specific evaluations indicate that the topography within the immediate project footprint is generally level to gently sloping, despite being mapped within soil units typically found on steeper slopes. This discrepancy reflects the scale and resolution of soil mapping data, which is not always representative of site-level grading or terrain.

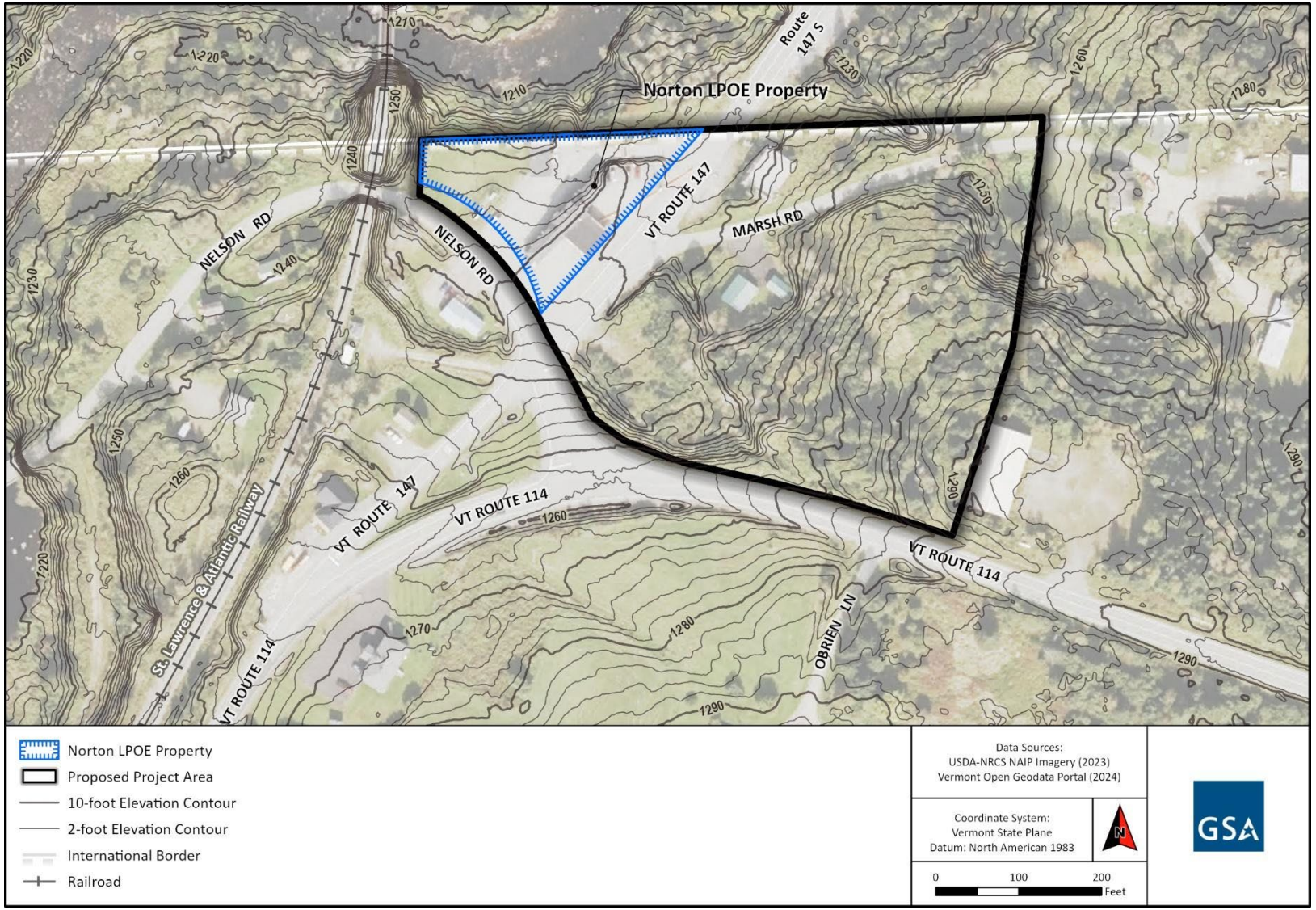

Figure 3-3. Topography in the Proposed Project Area and Adjacent Areas

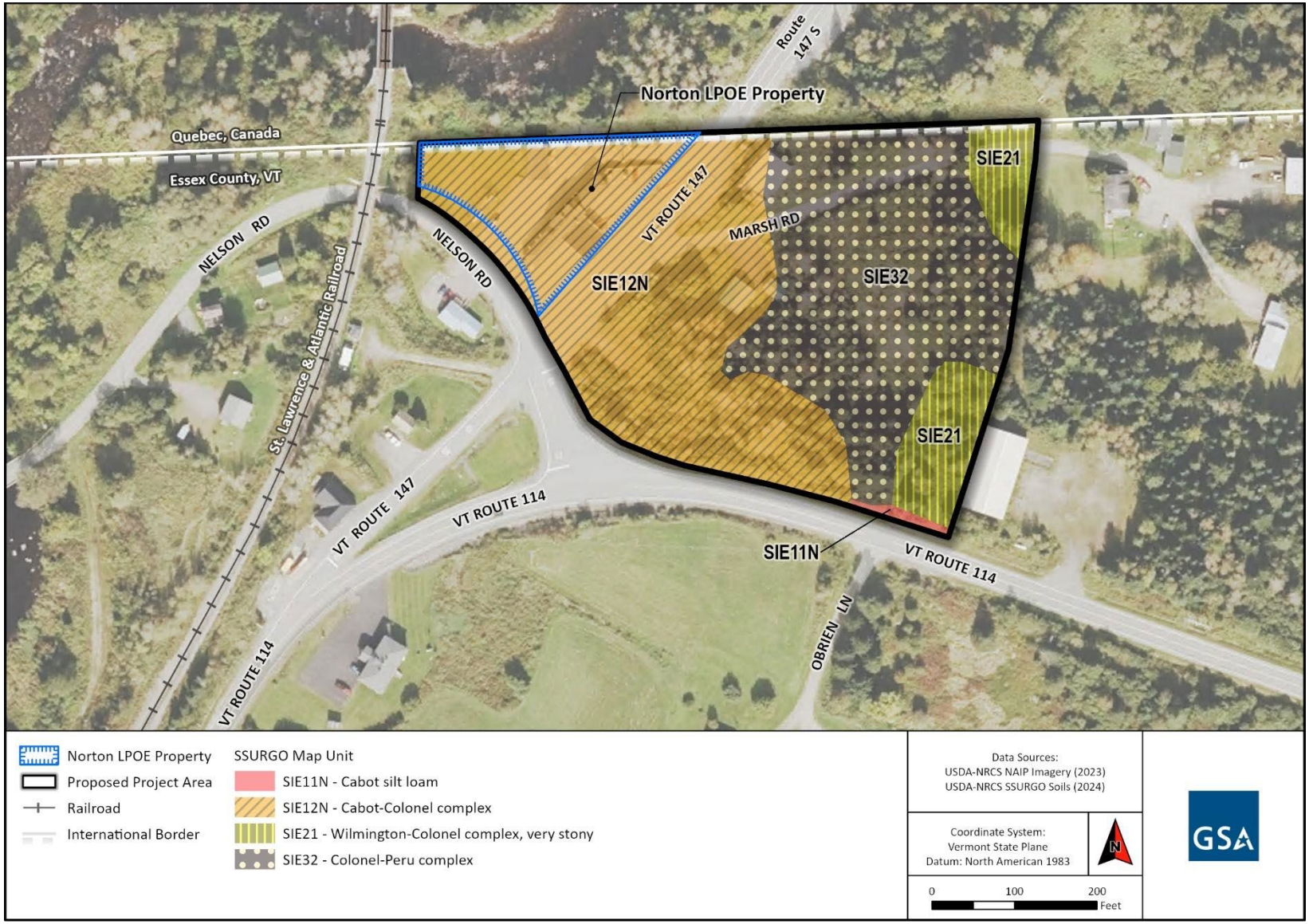

Figure 3-4. Soils in the Proposed Project Area

3.3.2 Environmental Consequences

3.3.2.1 Proposed Action Alternative

Geology

The Proposed Action Alternative would have short-term, minor, site-specific, adverse impacts on geology during demolition and construction activities within the Proposed Project Area. Construction of the new facilities and infrastructure would require excavation. However, the depth of excavation is currently unknown and would depend on the results of the geotechnical investigation and engineering report and geological hazard report to be prepared for the development in accordance with GSA PBS Interim Core Building Standards. Construction of the new facilities and infrastructure could involve some disturbance or modification of the surficial geology, but impacts would be anticipated to occur within a depth comparable to past construction of the existing LPOE facility. Construction of facilities to the current CBP LPOE Design Standards, as informed by the geological hazard report, would reduce the risk of damage to new structures and risks to LPOE staff or those transiting through the LPOE.

According to the Town of Norton Local Hazard Mitigation Plan (Town of Norton 2023), the probability of a seismic event (i.e., earthquake) occurring in the area is estimated between 1 percent and 10 percent annually (i.e., at least once in the next 100 years). However, there are no known active fault lines nearby, and Vermont is considered a low seismic hazard area. Any potential earthquakes are expected to be of low magnitude, with negligible impacts on the Proposed Project Area. Similarly, the probability of a landslide/rockslide is unlikely (less than 1 percent chance), with negligible impacts.

The Proposed Action Alternative would result in permanent, minor, site-specific, adverse alterations to topography due to grading required for construction activities, such as leveling the building pad and reconfiguring roads or drainage features. However, these changes would occur within a previously developed and relatively level area and would not substantially alter the existing landform or elevation profile. As such, overall impacts to topography would be considered permanent**,** minor, site specific, and adverse.

No further impacts to geology would be anticipated during operation of Norton LPOE under the Proposed Action Alternative beyond those described for demolition and construction.

Soils

The Proposed Action Alternative would be anticipated to result in permanent, minor, site-specific, adverse impacts to soils due to the loss of topsoil and potential increase of erosion in the Proposed Project Area. Construction under the Proposed Action Alternative would disturb a maximum of approximately 4.73 acres. This area includes the 0.83-acre operational area of the existing LPOE. This Draft EA assumes disturbance of the entire Proposed Project Area. However, it is likely that land preparation activities would require a lesser amount of

disturbance. Permanent loss of function in soils because of increasing impervious surface area would occur in areas that are converted to hard surfaces, which could result in increased water runoff and erosion.

The use of heavy equipment for site preparation and construction of buildings, roads/walkways, parking areas, and other infrastructure would require removal of vegetation, grading, excavation, and filling. Soil erosion from the use of heavy equipment could occur because of ground disturbance, leading to detachment of soils and transport of disturbed surfaces in wind and stormwater runoff. If any natural soil horizons exist, they would likely be lost during construction. Heavy equipment may compact or loosen and destroy the structure and function of organic and mineral soils during construction, reducing soil moisture and most likely resulting in increased runoff and erosion. Soil productivity (i.e., the capacity of the soil to produce vegetation) would be permanently impacted, as the surface soils would be replaced with mostly paved development.

The project would be required to obtain a Construction General Permit (CGP) or individual permit under the National Pollutant Discharge Elimination System (NPDES) program from the USEPA and have it certified by the Vermont DEC. The CGP would specify measures for stabilizing soils and minimizing soil loss during construction, which would limit impacts from soil erosion during construction. Likewise, an individual permit, if required, would include project-specific requirements to minimize impacts from soil erosion (Section 5.0 covers management and mitigation measures).

Once construction is complete and all hardscaping elements are in place, operational impacts to soils would be negligible. Most of the soil disturbance would have occurred during construction, and areas covered by buildings, pavement, or other impervious surfaces would no longer be exposed to soil-related impacts. Soils in undisturbed or restored areas may continue to support vegetation and stabilize over time, though routine site operations (e.g., vehicular traffic, snow removal, and site maintenance) could result in localized compaction or surface erosion in unpaved areas. Overall, long-term operational impacts to soils would be negligible and site specific.

3.3.2.2 No Action Alternative

The No Action Alternative would have no effects on geology, as GSA would not modernize or expand the Norton LPOE. Routine repairs and maintenance of the existing facility would continue per the current site management plan, and the Norton LPOE would operate under the existing conditions. However, the No Action Alternative would have permanent, minor, site-specific, adverse impacts to topography and soils due to erosion as GSA would not redesign the culverts.

3.4 Water Resources

This section discusses the affected environment and environmental consequences for water resources in and near the Proposed Project Area, including surface waters, stormwater, wetlands, and groundwater resources.

3.4.1 Affected Environment

The ROI for surface water resources and floodplains includes those resources existing in the Proposed Project Area and adjacent areas, including the Coaticook River. The ROI for groundwater resources includes any aquifer that underlies the Proposed Project Area.

Vermont DEC delineates the state of Vermont into 15 watershed basins and 97 wetland systems (Vermont DEC 2023). The Norton LPOE is in the Upper Connecticut (01080101) watershed, per the U.S. Geological Survey (USGS) eight-digit Hydrologic Unit Code database (USGS 2024). The watershed is part of the Lake Memphremagog, Tomifobia, and Coaticook watersheds, encompassing a total of 589 square miles in both the United States and Canada (Vermont DEC 2023). The Proposed Project Area also has groundwater wells, including gravel wells (VTANR 2024b).

3.4.1.1 Wetlands and Surface Waters

GSA conducted a wetland delineation on October 21, 2023, and April 17, 2024 (Appendix A), to determine the federal jurisdictional boundaries of wetlands identified within the Proposed Project Area. The wetland delineation covered approximately 19.85 acres, delineating one palustrine forested wetland, two streams, three roadside drainage ditches, and three culverts within the Proposed Project Area. The palustrine forested wetland (W02002) occupies the eastern portion of the Proposed Project Area, north of VT Route 114 (Figure 3-5) (WSP 2024b). Delineated features are summarized in Table 3-2. The two streams (T02001, T02002) found around the Proposed Project Area are north of VT Route 114, and both flow in the northwest direction, presumably into the Coaticook River. Two of the roadside ditches are associated with one palustrine scrub-shrub wetland (W02002) and one stream (T02002), with one culvert connecting the two ditches, which flow northwest into the southern portion of W02002. This stream (T02002) experiences flooding during storms due to culvert blockages, washing out the road and flooding the LPOE building. There have been two significant flooding events that have occurred in the last five years. Both events caused closure of the port for at least 8 hours. Numerous other smaller flooding events have caused disruptions in CBP operations, traffic patterns, and water intrusion into the LPOE building. The remaining ditches and culverts direct stormwater to the west and northwest of VT Route 147 toward the Coaticook River.

GSA conducted a site visit with USACE and Vermont DEC to verify delineated wetland boundaries on August 28, 2024, and submitted a request for a Preliminary JD on September 12, 2024. Vermont DEC issued its wetland boundary determination via email on December 2, 2024, and USACE issued a Preliminary JD on January 29, 2025 (Appendix A).

In the Preliminary JD, USACE determined that all the delineated features are federally jurisdictional based on their connectivity to the Coaticook River and its tributaries. Vermont DEC classified wetland W02002 as a Vermont Class III wetland.[7]

One parcel (447-141-10311; Figure 2-1) within the Proposed Project Area was not delineated because GSA was not able to obtain right of entry to the property. The parcel is in the southeast quadrant of the Proposed Project Area and is approximately 0.58 acres in size. Based on observations from abutting parcels and the adjacent roadway, the parcel is suspected to contain wetlands and other potentially jurisdictional features. If the Proposed Action Alternative is selected for implementation, GSA would conduct a delineation upon acquisition of the property, and coordinate with USACE and Vermont DEC to identify jurisdictional boundaries prior to project implementation.

Table 3-2. Summary of Delineated Features Within the Proposed Project Area

Feature	Latitude (Decimal Degree)	Longitude (Decimal Degree)	Cowardin Code	Area Delineated (Acres)	Length Within Delineated Area (Linear Feet)	Vermont DEC Wetland Class	USACE Jurisdictional
W02002	45.009714	-71.793175	PSS	0.33	N/A	3	Yes
T02001	45.010249	-71.79376	R3	N/A	85.88	N/A	Yes
T02002	45.010214	-71.79209	R4	N/A	412.17	N/A	Yes
D02015	45.00952	-71.79319	R6	N/A	271.92	N/A	Yes
D02017	45.01051	-71.79264	R6	N/A	129.60	N/A	Yes
D02018	45.01039	-71.79310	R6	N/A	123.35	N/A	Yes
C02008	45.010612	-71.792533	R6	N/A	57.42	N/A	Yes
C02009	45.010328	-71.793715	R6	N/A	178.76	N/A	Yes
C02012	45.010269	-71.793508	R6	N/A	115.71	N/A	Yes
Total				0.33	1,374.81		

Key: DEC = Department of Environmental Conservation; N/A = not applicable; PSS = palustrine scrub-shrub; R3 = riverine upper perennial; R4 = riverine intermittent; R6 = riverine ephemeral; USACE = U.S. Army Corps of Engineers

A drainage study was conducted in November 2024 to assess the existing stormwater pre-development conditions. Stormwater conveyance in the watershed within the Proposed Project Area consists of overland flow from the south and east of the intersection of Nelson Road and VT Route 147. Flow is channelized into a network of heavily riprapped ditches and culverts from

[7] A Vermont Class III wetland is not designated as significant under the Vermont Wetland Rules and is not subject to state regulatory protection (VTANR 2025).

12 inches to 32 inches in diameter, as well as a 36-inch box culvert. A total of 12 culverts were identified and analyzed for the study. The roadside ditches were identified as being in good condition. However, several of the culverts were partially or completely blocked with sediment, rocks, and brush, which ultimately reduces the stormwater systems' conveyance capability. In addition to damaged and blocked culverts, multiple culverts were identified as being undersized to accommodate existing and future conditions (Langan Engineering 2025).

3.4.1.2 Floodplains

A FEMA Flood Insurance Rate Map does not exist for the area that includes the Norton LPOE. The Coaticook River originates from the North Pond approximately 5 miles south of the Norton LPOE. It flows northward, crossing the United States–Canada border and joining the Massawipi River near Capelton, Quebec, approximately 25 miles north of the Norton LPOE. Based on the existing ground elevation of the Norton LPOE relative to the flood elevations, the current Norton LPOE infrastructure falls outside any potential riverine flood scenario evaluated (WSP 2024c).

A drainage study conducted in November 2024 highlighted several factors that could contribute to potential flooding in the area (Langan Engineering 2025). The Proposed Project Area, which is near the downstream end of a 19.97-acre watershed, receives off-site stormwater runoff that crosses the site on the surface in overland flow and below the surface in piped flow, ultimately discharging into the Coaticook River from five discharge points. The watershed's soil and wetland conditions create a tendency for standing water and have a very low infiltration rate and high runoff potential when thoroughly wet (Langan Engineering 2025). Road inundation, erosion, and washouts occur throughout the watershed during high-intensity precipitation (Langan Engineering 2025). Furthermore, the blocked culverts will reduce the stormwater system's conveyance capability, potentially leading to increased flooding, water pooling, and an increase in erosion in the surrounding area. There have been two significant flooding events that have occurred in the last five years. Both events caused closure of the port for at least 8 hours. Numerous other smaller flooding events have caused disruptions in CBP operations, traffic patterns, and water intrusion into the LPOE building.

3.4.1.3 Groundwater

Statewide ambient groundwater data was compiled in 2008 by USGS from available databases to monitor potential groundwater pollution sources. The Proposed Project Area overlies the northern section of Essex County, which contains gravel wells with a mean flow of 15.14 gallons per minute. The aquifer is composed of undifferentiated granitic rocks and gray phyllite, schist, quartzite, and micaceous limestone (Vermont DEC 2009), especially near Norton. Sampling results generally indicate very good groundwater quality conditions. Water levels may fluctuate due to the Norton Pond Dam flow, located approximately 6 miles south of the LPOE along VT Route 114. Fluctuating water levels in Norton Pond can influence the groundwater recharge process. When the pond's water level is high, more water may infiltrate into the surrounding groundwater system. Conversely, when the water level is low, less water may infiltrate.

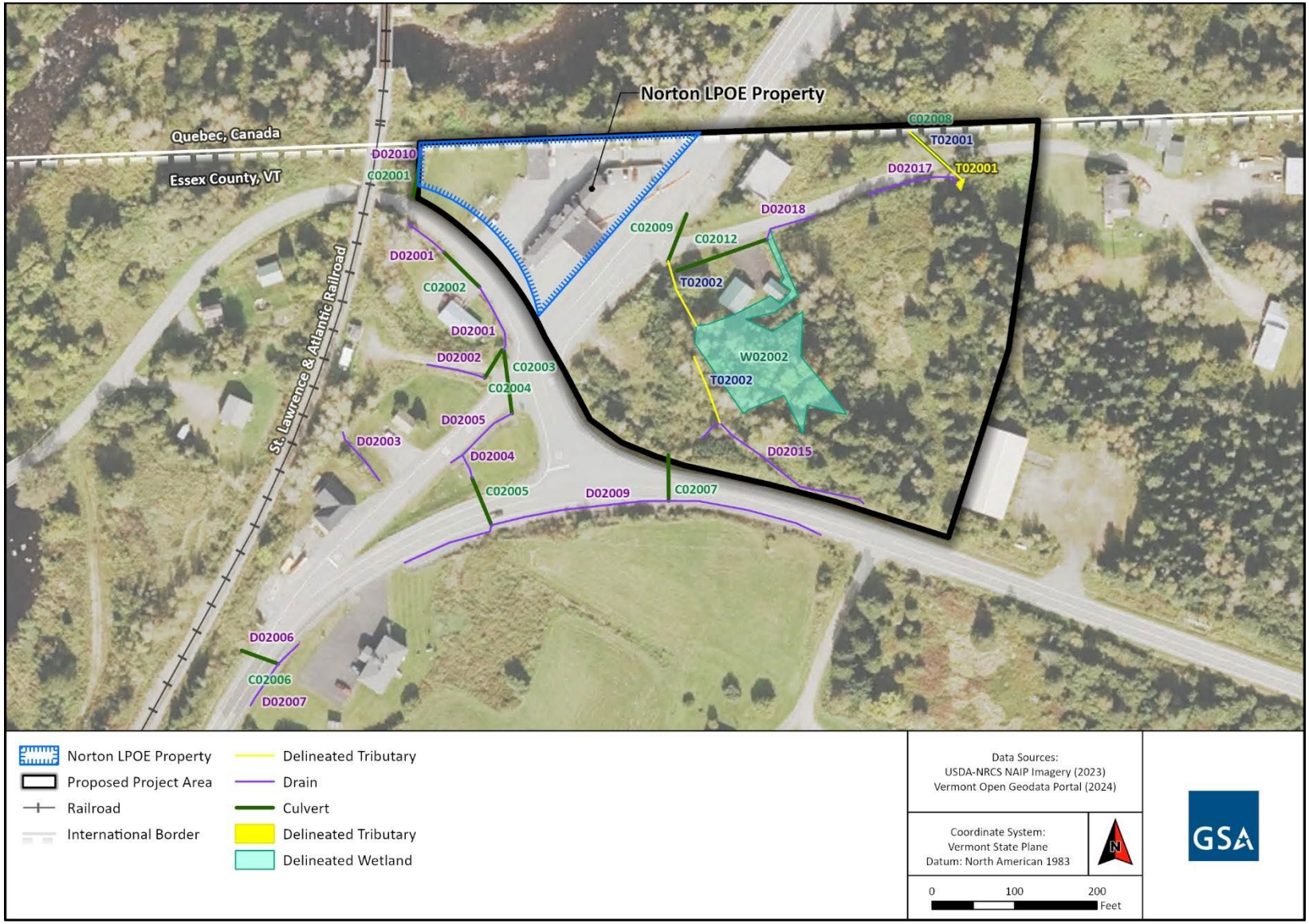

Figure 3-5. Delineated Features in and Adjacent to the Proposed Project Area

3.4.2 Environmental Consequences

3.4.2.1 Proposed Action Alternative

Wetlands and Surface Waters

Under the Proposed Action Alternative, ground-disturbing activities, such as clearing, excavating, grading, and adding impervious surface, for the new LPOE facility would result in minor, localized, short- and long-term, adverse impacts on surface water resources, including wetlands and tributaries. Construction activities would result in up to approximately 4.73 acres of ground disturbance, which would increase the potential for erosion and the transport of sediment into surrounding water resources from overland stormwater runoff. The operation of construction equipment could result in adverse impacts through increasing the potential for accidental leaks or spills of fuel, lubricants, or other materials that could contaminate nearby water resources. Minor, long-term, site-specific, adverse impacts would occur to approximately 0.33 acres of wetlands and 397 feet of tributaries because of the Norton LPOE reconfiguration and the addition of an outbound lane. Site design may additionally require the placement of fill within wetlands, which would result in a loss of habitat, water quality degradation, and an increase in erosion.

The Proposed Action Alternative could have short-term, negligible, local and regional, adverse impacts on the water quality of the Coaticook River due to land disturbance and altered drainage patterns, potentially leading to increased erosion, sedimentation, and pollutants in receiving waters. Potential impacts to the Coaticook River would be reduced by implementing the impact reduction measures and best management practices (BMPs) discussed at the end of this section.

Following construction, operational impacts to wetlands and surface waters would be minor. Most impacts (e.g., filling of wetland areas or stream channels) would occur during construction and would be subject to regulatory permitting and mitigation requirements. Once operational, the facility would include permanent impervious surfaces that may alter stormwater runoff patterns; however, with appropriate stormwater management infrastructure in place, runoff volumes and water quality would be effectively controlled. Routine operations, such as vehicle use or site maintenance, would not be expected to disturb wetlands or surface waters. Therefore, long-term operational impacts would be limited to potential changes in hydrology from increased impervious cover, which would be managed through engineered drainage systems and BMPs, as discussed below, resulting in minor, short-term, and localized impacts, if any.

GSA would mitigate potential impacts the Proposed Action Alternative may have on water resources through site design in accordance with federal and state requirements. Culverts would be upgraded to enhance water flow through channels, ensuring that stormwater is efficiently carried away from streets, properties, and infrastructure. Additionally, properly designed and maintained culverts would help stabilize the flow of water, reducing the likelihood of erosion along streambanks, roadways, and drainage channels. Upgraded catch basins would have

increased capacity to collect and direct runoff, preventing surface water from overwhelming drainage systems. The specific mitigation features to be implemented at the site would be determined during the design phase.

Under the Proposed Action Alternative, if it is determined that wetlands would need to be filled, GSA would consult with USACE and Vermont DEC to obtain all necessary permits and define mitigation requirements for the impacts to wetlands. GSA would obtain a CGP or individual permit from the USEPA through the NPDES program and have the permit certified by Vermont DEC. The conditions of the CGP would include development of a stormwater pollution prevention plan, implementation of erosion and sediment controls, and routine site inspections. Potential BMPs are outlined in Section 5.0. If required, an individual permit would include project-specific requirements to protect local water quality. Post-construction, GSA would meet the conditions of the Notice of Termination, which involves certifying that the site has been stabilized with vegetation, the drainage system is stable, and temporary BMPs have been removed. Adherence to the conditions of the NPDES permit would minimize potential impacts to surface waters.

Floodplains

The Proposed Action Alternative does not occur within the FEMA-mapped 1-percent-annual chance or 0.2-percent-annual chance floodplain. Therefore, no floodplains impacts would occur.

Because the Proposed Project Area is outside of FEMA-mapped regions, no further impacts to the floodplains would be anticipated during operation of the Norton LPOE. To mitigate future impacts from flooding, the 2024 drainage study recommended that any proposed projects at the Norton LPOE site route the off-site stormwater runoff through or around the site and replace damaged or undersized culverts (Langan Engineering 2025). Additionally, it was recommended that the riprap for the two existing pipe outfalls to the Coaticook River be regularly maintained and reinforced to mitigate erosion and washout from high-flow storm events.

Groundwater

The potential for adverse impacts from contamination of groundwater during use, removal, or replacement of a well would be negligible, as the construction, maintenance, and sealing would follow all applicable regulations. During construction, there is the potential for spills or runoff of chemicals, such as fuels, solvents, and concrete additives, that could infiltrate the soil, potentially adversely impacting groundwater. Additionally, the development of roads, buildings, parking lots, and other structures creates impervious surfaces that prevent rainwater from naturally soaking into the ground, ultimately reducing groundwater recharge. It is possible that existing groundwater monitoring wells would be replaced under the Proposed Action Alternative. Final design would determine whether removal/replacement of existing wells is required, and GSA would coordinate with Vermont DEC and other appropriate agencies to determine whether installation of new groundwater wells would be necessary in other locations.

Operations under the Proposed Action Alternative would not be anticipated to have any short- or long-term, site-specific, local, or regional, adverse or beneficial impacts to groundwater. Water usage during operation of the modernized and expanded Norton LPOE would be expected to remain consistent with current conditions, with no increased demand on local groundwater resources. Although impacts are not expected, standard protective measures would be implemented to ensure continued groundwater protection. These measures include compliance with the Spill Prevention, Control, and Countermeasure (SPCC) rule, which requires the facility to maintain an SPCC plan, as well as the use of BMPs and proper waste management procedures to reduce the potential for spills or contamination.

3.4.2.2 No Action Alternative

Under the No Action Alternative, GSA would not modernize or expand the Norton LPOE, and current facilities and infrastructure would remain. Operations would continue and routine repairs and maintenance of the existing facility would continue per the current site management plan. However, GSA would not redesign the culverts and the potential for stormwater flooding resulting from erosion, sediment, and increased sediment load would remain. The No Action Alternative would have permanent, minor, site-specific, adverse impacts to water resources.

3.5 Cultural Resources

This section discusses the affected environment and environmental consequences that would result under each alternative for cultural resources, which are associated with the human use of an area and may include archaeological sites, locations of ethnographic interest, or historic properties. A cultural resource can represent past cultures or modern cultures, and can be composed of physical remains, intangible traditional use areas, or an entire landscape.

3.5.1 Affected Environment

Section 106 of the National Historic Preservation Act of 1966 requires federal agencies to consider the effects of their activities on cultural resources, including historic and archaeological resources, and to consult with the Vermont SHPO and the Advisory Council on Historic Preservation on ways to avoid, minimize, or mitigate adverse effects on cultural resources.

The ROI for cultural resources is referred to as the Area of Potential Effect (APE). The APE defines the geographic area within which an undertaking may disturb archaeological resources, if present, or cause alterations in the character or use of historic properties, if such properties exist. An undertaking is defined as a project, activity, or program funded in whole, or in part, under the jurisdiction of a federal agency, including, among other things, processes requiring a federal permit, license, or approval (36 CFR 800.16). For this project, the undertaking is synonymous with the Proposed Action Alternative discussed in Section 2 and includes any demolition and construction activities occurring within the APE.

The Proposed Project Area for the proposed modernized Norton LPOE is approximately 4.73 acres and includes the existing Norton LPOE and parts of the surrounding properties. The APE for cultural resources includes all portions of the study area that would be directly or indirectly affected by the Proposed Action Alternative. The Proposed Action Alternative would involve both ground-disturbing and aboveground activities that have the potential for impacts on archaeological and historic resources within the study area.

3.5.1.1 Archaeology

The physical environment of an area is significant for determining the sensitivity of the APE for archaeological resources. Precontact and historic groups often favored level, well-drained areas near wetlands and waterways. Therefore, topography, proximity to wetlands, and soils are examined to determine if there are landforms in the APE that are more likely to contain archaeological resources. In addition, bedrock formations may contain chert or other resources that may have been quarried by precontact groups. Soil conditions can provide a clue to past climatic conditions, as well as changes in local hydrography. There are no alluvial, colluvial, aeolian, or fill soils present (Hartgen 2024a). Therefore, any archaeological deposits present are likely to be located at shallow depths.

Hartgen Archeological Associates, Inc. (Hartgen) conducted an Archaeological Resources Assessment in August 2024. This investigation included documentary research using the Vermont Online Resource Center (ORC), which the Vermont Division for Historic Preservation (VDHP) maintains, as well as consultation of historic mapping. The Vermont ORC contains an inventory of previously conducted cultural resource surveys, previously recorded archaeological sites, historic properties listed in both the NRHP and State Register, and properties determined eligible for listing in the NRHP. Additionally, Hartgen consulted the VDHP Environmental Predictive Model, which evaluates the precontact archaeological sensitivity of a given area, and the Vermont Archaeology Inventory Precontact Use Analysis Map Tool.

Three Archaeologically Sensitive Areas (ASAs) were identified within the APE of the Proposed Action Alternative (ASAs 1, 3, and 4). Areas of historic sensitivity, which are also documented as ASAs, are identified based on proximity to previously documented historic archaeological sites, map-documented structures, or other documented historical activities (e.g., battlefields). Hartgen's investigation also identified that ASA 3 is sensitive for historic cultural materials in addition to precontact materials (Hartgen 2024a).

Additionally, PAL conducted a cultural resources survey in May 2005 in the Norton LPOE facility property (PAL 2005). PAL excavated eight 50- by 50-centimeter test pits northwest of the existing Norton LPOE within the manicured lawn in the area identified as ASA 1 by Hartgen. The survey did not identify any cultural materials or features.

3.5.1.2 Historic Resources

Pursuant to Section 106 of the National Historic Preservation Act, a Historic Resources Identification (HRI) assessment was completed to identify historic properties listed or eligible for listing in the NRHP that could be affected by the Proposed Action Alternative (Hartgen 2024b). The HRI assessment included background research using the Vermont ORC and a site visit conducted on June 25 and 26, 2024, to observe and photograph existing conditions in the APE.

The HRI assessment identified seven resources (buildings) within or adjacent to the Proposed Project Area. Of these resources, one does not meet the age requirement for NRHP evaluation, four were not recommended eligible due to lack of integrity or significance, one resource was previously determined eligible for listing in the NRHP, and one resource is listed in the NRHP. The two historic resources are the U.S. Inspection Station—Norton, Vermont (existing Norton LPOE), and the Norton Town Hall/Former Norton Town School. Both resources are included in the analysis of the Proposed Action Alternative to address potential impacts (Figure 3-6).

The U.S. Inspection Station—Norton, Vermont (existing Norton LPOE) was listed in the NRHP (identification number 14000603) in 2014 with local significance under Criteria A and C (Paul and Starzak 2011). The existing LPOE Main Building, also known as the Norton Inspection Station or Norton Border Inspection Station, was built in 1933 and consists of a 1.5-story, Colonial Revival-style, brick-veneer station building flanked by symmetrical one-story wings containing inspection bays. The elongated station building faces southeast toward VT Route 147. A metal porte-cochere or inspection canopy supported on metal posts extends southeast from the front eave of the station over two vehicle lanes. This nonoriginal feature was built in 1974 and replaced the original porte-cochere, which had approximately the same footprint but was not as tall as its replacement. The taller canopy responded to evolving vertical clearance design standards for the interstate highway system. Due to the sloping topography, the northwest side of the building has an exposed lower level with exterior access.

The U.S. Inspection Station—Norton, Vermont (existing Norton LPOE) retains the integrity and associative attributes required to convey significance under Criteria A and C, as defined in the Multiple Property Documentation Form (MPDF) for U.S. Border Inspection Stations, within the context of "Combined Customs and Immigration Inspection at Land Crossings Along the International Borders, 1930-1943." The Norton Inspection Station demonstrates one of several plan types developed in the late 1920s by the U.S. Department of the Treasury for the first purpose-built U.S. border Inspection Stations at international land crossings. The programmatic need for standardized border inspection stations arose from the convergence of several historical trends: increased motor vehicle use and improved road access at land borders, increased illegal immigration stemming from immigration laws passed in 1917 and 1921, and increased smuggling activity during Prohibition (1920–1933) (Starzak et al. 2011).

The MPDF for U.S. Border Inspection Stations built from 1930 to 1943 includes the porte-cochere among the property type registration requirements as an associative attribute of a proper border inspection facility. In evaluating the integrity of this element, the MPDF notes that "considerations may be made in cases where the porte-cochere was modified to accommodate taller vehicles" (Starzak et al. 2011). Although the Norton Inspection Station canopy is not original, it is a historic alteration and a character-defining feature of the building (Belfast et al. 2009). The Norton Inspection Station property also includes a rubble stone retaining wall built in 1958 in combination with a new access road on the north side of the building and a new truck facility warehouse (GSA 1995). The truck facility warehouse was previously determined not eligible individually and is not a contributing element of the Norton Inspection Station (Belfast et al. 2009).

The Norton Town Hall/Former Norton Town School was determined eligible for listing in the NRHP in 2004, with local significance under Criteria A and C. Built circa 1923 on a high concrete foundation scored to resemble concrete block, the school building is a rectangular, 1.5-story, five-bay-wide, hipped-roof, vinyl-clad building with an open gabled entry porch centered in its west façade. As an intact early 20th-century, two-room schoolhouse, the building is "associated with events that have made a significant contribution to the broad patterns of our history" and embodies "the distinctive characteristics of a type, period, or method of construction" (VDHP 2004). The rehabilitation of the unfinished walkout basement level into a town hall and town clerk's office was deemed by VDHP to have no adverse effect to the historic resource in 2004 (VDHP 2004).

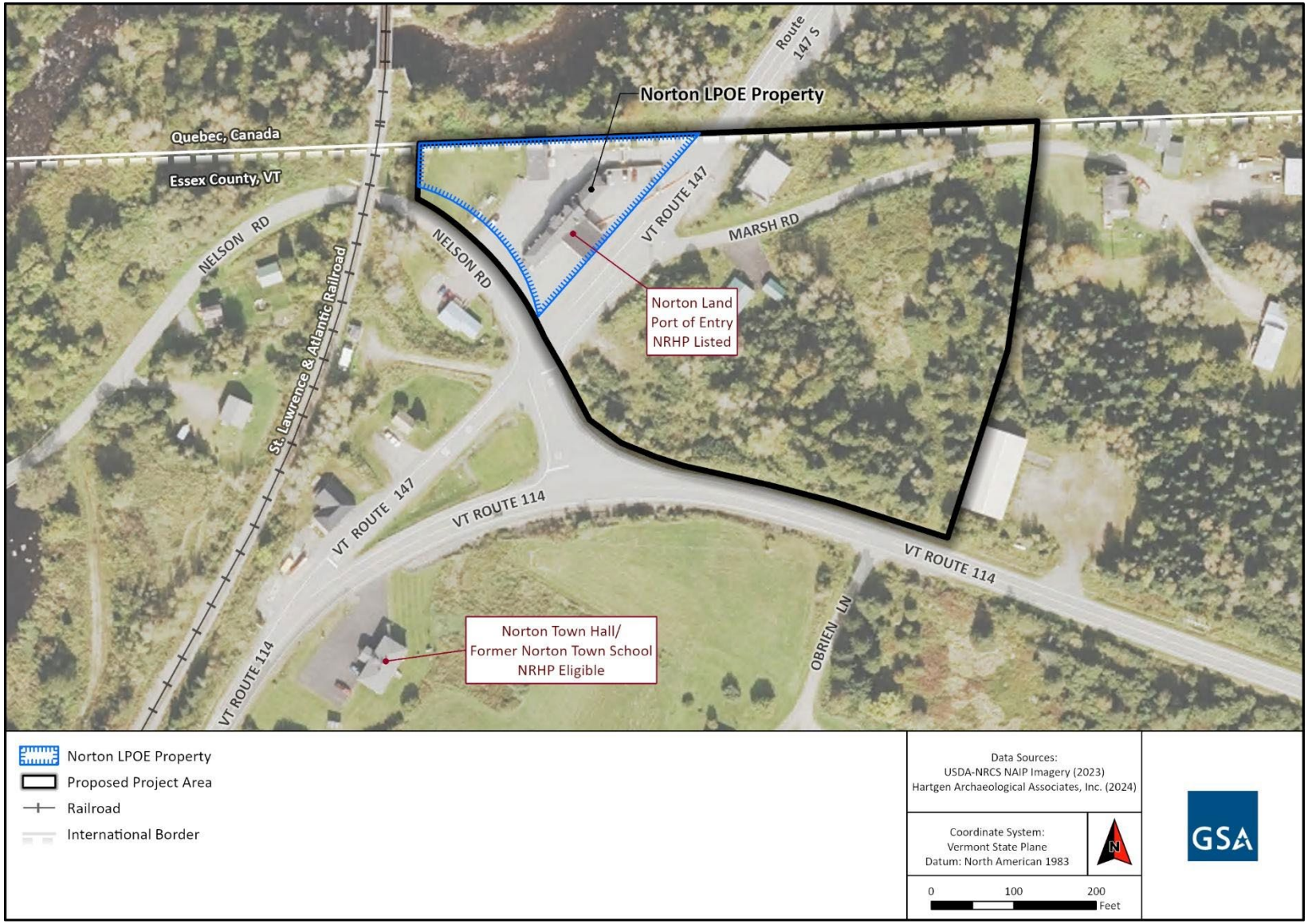

Figure 3-6. Historic Resources in or Adjacent to the Proposed Project Area

3.5.2 Environmental Consequences

3.5.2.1 Proposed Action Alternative

Archaeology

The areas of disturbance for the Proposed Action Alternative have the potential to intersect with three ASAs. To protect potential resources from inadvertent disturbance, if necessary, the APE would be fenced off with temporary fencing placed at a buffered distance of 50 feet. Additionally, all areas of ground disturbance within the intersected ASAs that have not been previously surveyed for cultural resources would be subjected to Phase 1B archaeological testing, if required, prior to any ground-disturbing activities to identify any potentially intact subsurface precontact or historic materials that may be eligible for listing in the NRHP.

Through the Section 106 process, GSA would identify impacts on archaeological resources and, if necessary, negotiate measures to avoid, minimize, or mitigate adverse effects.

In the unlikely event of a discovery of archaeological resources during construction, GSA would halt work in the immediate vicinity of the suspected archaeological resources, and work would not continue in the area of the discovery until a qualified archaeologist could inspect the find. GSA would notify the SHPO, CBP Energy and Environmental Project Management Office, and other consulting parties of the discovery and would treat any discovered materials in accordance with applicable state and federal laws.

The Proposed Action Alternative would require up to 4.73 acres of ground-disturbing activities, such as excavation, grading, and clearing during construction, which could destroy the context and integrity of any potential archaeological resources within the APE. Because of the importance of the integrity of cultural materials, the soil context surrounding materials, and their stratigraphic position within the ground, these activities could have major, permanent, site-specific, adverse effects to any archaeological resources within the APE.

Historic Resources

The Proposed Action Alternative would include the full demolition of the historic LPOE Main Building to accommodate construction of a new outbound lane and a new and larger LPOE building, introducing new visual elements into the viewshed of the Norton Town Hall/Former Norton Town School. Therefore, the Proposed Action Alternative would result in major, permanent, site-specific, adverse impacts to historic resources.

3.5.2.2 No Action Alternative

Archaeology

The No Action Alternative would have no effects on archaeological resources, as GSA would not modernize or expand the Norton LPOE. Routine repairs and maintenance of the existing facility would be conducted, and the Norton LPOE would operate under the existing conditions.

Historic Resources

The No Action Alternative would have no effects on historic resources, as GSA would not modernize or expand the Norton LPOE. GSA would not demolish the historic LPOE. Routine repairs and maintenance of the existing facility would be conducted, and the Norton LPOE would operate under the existing conditions.

3.6 Socioeconomics

This section describes the socioeconomic environment in the vicinity of the Proposed Project Area in Essex County and in the state of Vermont, with discussion of local and county demographic and employment information. This section considers potential changes to socioeconomics during both construction and long-term operations at the Norton LPOE.

3.6.1 Affected Environment

The ROI for socioeconomic analysis focuses on the populations within U.S. Census Tract 9501, block group 1, which encompasses the town of Norton and the Norton LPOE. Data is presented for Essex County and is compared to the state of Vermont. Data for Norton is included where available and appropriate. Essex County is located within the Northeast Kingdom region of Vermont, and regional socioeconomic data is provided where applicable. This section also considers the availability of temporary housing for construction workers; therefore, some of the discussion extends to areas outside of the identified ROI.

3.6.1.1 Local and Regional Economy

The Norton town center lies adjacent to the United States–Canada border in northwestern Essex County. Most Norton resident population lives along VT Route 114 and the Coaticook River.

Businesses in Norton are primarily service sector businesses, except for a logging and general contracting business. Norton contains one restaurant and two service stations with convenience stores. One dairy farm operates in Norton, and other agricultural areas are used to produce hay crops and for woodlot use and maple sugar production. These farm operations typically average 200 acres or more (Town of Norton 2019).

Norton and nearby communities are closely linked economically. Norton residents commute to other communities for work and to participate in community life, and residents of nearby communities travel to Norton for outdoor recreation opportunities. Norton residents rely

primarily on the towns of Canaan, Island Pond, West Stewartstown (New Hampshire), and Coaticook (Quebec) for most basic goods and services. Norton residents frequently travel 8 miles north to Coaticook to access food markets, hardware stores, medical care, restaurants, funeral homes, drug stores, and banks (Town of Norton 2019). In comparison, Norton residents must travel approximately 30 miles to Derby, Vermont, to access comparable goods and services on the American side of the border. Sherbooke, Quebec, a 30-minute drive north of Norton, is the nearest location for major shopping (e.g., "big-box" stores). The level of importance of many of these services in Canadian communities to Norton residents changes depending on fluctuations in the currency exchange rate (Town of Norton 2019).

3.6.1.2 Eco-Tourism

The area surrounding Norton is a destination for Vermonters and Canadians. Businesses in Norton benefit from the regional accessibility provided by the Norton LPOE and VT Route 114. VT Route 114 serves as a major route to popular outdoor recreation areas, including Burke Mountain and Kingdom Trails, about 35 miles south of the Norton town center. In the winter, VAST maintains popular snowmobile trails—these trails intersect with VT Route 114 and extend north to cross the Canadian border (Town of Norton 2019). Snowmobilers frequent the service stations and restaurant in Norton. Other recreational opportunities, such as fishing on Norton Pond or Great Averill Pond, attract visitors to the region year-round. Norton businesses provide goods and services (e.g., gasoline, food, fishing bait) that might not be immediately accessible elsewhere while visiting the local area or traveling through the Northeast Kingdom region.

3.6.1.3 Rail

The town is bisected from north to south by VT Route 114 and the SLR, which runs parallel to it. Originating out of Montreal, Quebec, the SLR operates 30.65 miles of track from Norton, Vermont, to North Stratford, New Hampshire. This railroad is one of two lines in the Northeast Kingdom region that crosses into Quebec and is therefore important for international trade. The SLR is capable of handling double-stacked carloads on its entire length. Approximately 26,000 annual carloads of SLR traffic travel through Vermont, of which approximately 2,060 carloads originate or terminate in Vermont. Freight handled consists of shipments of paper, forest products, chemicals, grain, salt, and various consumer goods. Presently, there are no passenger operations on the line (NVDA 2023).

3.6.1.4 Housing

According to the 2020 Decennial Census, there were 197 housing units in Norton, with 76 occupied units (38.6 percent). In the Northeast Kingdom region, more than one out of every five housing units is a vacant housing unit intended for "seasonal, recreational, or occasional use" (NVDA 2023). By comparison, the statewide percentage of vacant seasonal housing stock is 15.6 percent (U.S. Census Bureau 2022a). Residential development trends have favored large-lot rural residential in recent years (NVDA 2023). As Vermont becomes a more attractive destination for retirees, longtime seasonal residents may be more likely to become full-time residents.

3.6.1.5 Temporary Lodging

There are no hotels in the Norton area. Visitors to the local area can find accommodations at privately owned vacation rentals (i.e., cabins). The nearest hotel is in Island Pond, Vermont, approximately 16 miles south of Norton.

3.6.1.6 Employment and Income

Jobs are relatively scarce in the Northeast Kingdom region, and residents may commute long distances to work. Most Norton residents work in the nearby communities of Canaan and Island Pond, Vermont; and West Stewartstown and Colebrook, New Hampshire (Town of Norton 2019). Occupations in management, business, science, and arts; natural resources, construction, and maintenance; and sales and office work are most common (Table 3-3) (U.S. Census Bureau 2022b). Transportation, warehousing, and utilities are the dominant industry in the area (Table 3-4). The median household income in Norton is $49,643, which is lower than the state median household income of $74,014 (U.S. Census Bureau 2024).

Lack of employment in the local area is a driver for longer commuting times for residents. In Norton, the mean travel time to work is 32.5 minutes (U.S. Census Bureau 2022b). Norton residents rely on access to nearby communities for employment and income. Essex, Orleans, and Caledonia counties have the state's highest percentages of residents who travel greater than 50 miles in one direction to their place of work (NVDA 2023).

Table 3-3. Percentage of Population Employed by Occupation – Norton, Vermont

Occupation	Percentage of Population Employed
Management, business, science, and arts occupations	43.42
Sales and office occupations	19.74
Natural resources, construction, and maintenance occupations	18.42
Service occupations	9.21
Production, transportation, and material moving occupations	9.21

Source: U.S. Census Bureau 2022b

Table 3-4. Percentage of Population Employed by Industry – Norton, Vermont

Industry	Percentage of Population Employed
Transportation and warehousing, and utilities	23.68
Professional, scientific, and management, and administrative and waste management services	15.79
Educational services, and health care and social assistance	15.79
Agriculture, forestry, fishing and hunting, and mining	9.21
Construction	7.90
Other services, except public administration	7.90
Arts, entertainment, and recreation, and accommodation and food services	6.58
Public administration	6.58
Retail trade	3.94
Manufacturing	2.63

Source: U.S. Census Bureau 2024

3.6.2 Environmental Consequences

3.6.2.1 Proposed Action Alternative

The Proposed Action Alternative would include land acquisition and construction within the Study Area. The Proposed Action Alternative would require the acquisition of private property in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies for Federal and Federally Assisted Programs Act (the Uniform Act). GSA would notify the property owner of its intent to acquire and its appraisal obligations. GSA would determine the amount of just compensation to be offered for the private property; this amount would not be less than the fair market value established by an approved appraisal. No residential properties would be acquired. Therefore, the Proposed Action Alternative would have long-term, moderate, site-specific, adverse effects to private citizens whose property is acquired for the Project. There would be long-term, minor, localized and regional, adverse effects to socioeconomics due to the loss of real estate tax revenue from the replacement of private property with federal property.

Under the Proposed Action Alternative, the Norton LPOE would remain open during construction, providing continued access to and from adjacent Canadian communities for basic goods and services, eco-tourism, and recreational opportunities, as well as employment opportunities. There would be short-term, minor, site-specific, adverse effects to access due to lane closures, possible detours, and construction vehicles using local roads. A traffic management plan would be prepared prior to the start of construction that would outline the anticipated timing, duration, and proposed phasing of any travel lane closures, traffic detours, and mitigation measures.

Following construction, traffic patterns and access are expected to return to pre-construction conditions. In the long term, the project would improve operational efficiency at the port of entry, resulting in minor, localized, beneficial impacts for the local community, such as reduced wait times and an improved experience for travelers and employees.

3.6.2.2 No Action Alternative

The No Action Alternative would have no effects on socioeconomics, as GSA would not modernize or expand the Norton LPOE. Routine repairs and maintenance of the existing facility would continue under the current management plan, and the Norton LPOE would operate under the existing conditions. As a result, existing deficiencies—including inadequate stormwater drainage infrastructure—would persist, potentially leading to recurring temporary closures. Although the exact frequency and duration of such closures cannot be predicted, these disruptions could negatively affect local cross-border travel and community access, resulting in long-term, moderate, regional, adverse impacts to socioeconomic resources.

3.7 Traffic and Transportation

This section describes baseline conditions and evaluates environmental consequences for traffic and transportation in the Proposed Project Area. Traffic refers to vehicular traffic volumes on key roadways serving the Proposed Project Area.

3.7.1 Affected Environment

3.7.1.1 Transportation

The ROI includes VT Route 147 and VT Route 114, as well as the two town roads: Marsh Road and Nelson Road. The ROI also includes the portion of VT Route 114 that runs to the east for approximately 12.9 miles before intersecting with VT Route 141 near the Canaan LPOE facility in Canaan, Vermont, and the portion of VT Route 114 that runs to the south for approximately 16 miles before intersecting with VT Route 111, approximately 2.8 miles north of Brighton, Vermont (Figure 3-7).

VT Route 147 travels north–south through the Norton LPOE and continues into Canada as Quebec Route 147. VT Route 147 is a two-lane highway, functionally classified as a major collector. Major collectors typically have limited or controlled access and are designed to be able to handle medium to high speeds and traffic volumes (VTrans 2020). VT Route 147 connects the LPOE with the town of Norton and VT Route 114 approximately 0.12 miles south of the Norton LPOE facility. VT Route 114 connects the town of Norton to the town of Canaan, Vermont, and to the state of New Hampshire as it crosses the Connecticut River to the east. VT Route 114 connects to the towns of Island Pond and Lyndon to the south before terminating at U.S. Highway 5. Figure 3-7 illustrates the regional transportation network in the vicinity of the Norton LPOE.

Figure 3-7. Regional Transportation Network

Two town roads that connect to VT Route 147 also pass through the Proposed Project Area. Marsh Road is a 0.1-mile town road that provides access to VT Route 147 and to a few residential properties. Nelson Road is a two-lane town road bordering the existing Norton LPOE to the south and heading west underneath the SLR bridge and over the Coaticook River, leading to several private residential and agricultural properties. The existing Norton LPOE has five designated parking spots in front of and just to the north of the LPOE Main Building. Behind the LPOE Main Building to the west and just to the south of the garage is a paved area that is also used as overflow parking, which could potentially block trucks from backing into the garage area for inspections. Due to the parking configuration at the existing Norton LPOE, parking is limited for both northbound and southbound visitors.

The SLR owns the rail line to the west of the Norton LPOE facility and provides freight train access into Vermont and Quebec via the United States–Canada border. The SLR does not provide passenger train service. The SLR has one shipment facility that allows trains to transload and reload in Vermont. The facility is located in the town of Brighton, approximately 16.5 miles south of the Norton LPOE. The SLR then continues southeast into New Hampshire and continues into Maine, where it terminates south of Lewiston (Genesee & Wyoming Inc. 2024).

3.7.1.2 Traffic

Annual Average Daily Traffic (AADT) is a measure used primarily in transportation planning to estimate the mean traffic volume across all days for a year for a given location along a roadway. The Vermont Agency of Transportation (VTrans) report shows a traffic count on VT Route 147 of 52 AADT in both directions south of the Norton LPOE for 2022 (VTrans 2024a). There are no pedestrian facilities or designated U.S. bicycle routes along VT Route 147 that pass through the Norton LPOE (VTrans 2024b).

The VTrans report shows a traffic count on VT Route 114 of 586 AADT in both directions south of the Norton LPOE where it intersects with VT Route 147 in 2022 (VTrans 2024a). There are no pedestrian facilities or designated U.S. bicycle routes along VT Route 114 that pass through the town of Norton (VTrans 2024b).

Border crossing data shows that in 2023 the Norton LPOE processed 12,103 privately owned vehicles (POVs) and 5,429 commercially owned vehicles (COVs) (USDOT BTS 2024), a 26 percent increase in POV crossings and a 15 percent decrease in COV crossings from 2022. Overall, crossings were substantially higher before the COVID-19 pandemic, with 24,865 POV crossings and 11,313 COV crossings in 2019. POV border crossings are starting to increase again post-pandemic. There were 153 train crossings in 2023, a decrease from the 196 train crossings that took place in 2022, and a decrease from the 213 train crossings in 2019 (USDOT BTS 2024). Table 3-5 summarizes border crossings at the Norton LPOE from 2013 to 2023.

Table 3-5. Norton LPOE Border Crossings from 2013–2023

Year	POV Crossings	COV Crossings	Train Crossings
2013	81,080	10,827	258
2014	70,607	11,161	216
2015	43,195	11,222	212
2016	31,194	11,896	197
2017	30,711	12,556	258
2018	31,225	12,112	193
2019	24,865	11,313	213
2020	3,106	8,253	199
2021	2,144	7,429	200
2022	9,054	6,346	196
2023	12,103	5,429	153

Source: USDOT BTS 2024
Key: COV = commercially owned vehicles; LPOE = Land Port of Entry; POV = privately owned vehicles

3.7.2 Environmental Consequences

3.7.2.1 Proposed Action Alternative

The Proposed Action Alternative would require the relocation of a portion of Marsh Road. Marsh Road would no longer start at VT Route 147 but would be reconstructed to start at VT Route 114 to the southeast of the new Norton LPOE facility. Temporary disruptions to traffic could occur due to detours during construction, which could increase vehicle traffic on VT Route 114 and other roads leading to nearby LPOEs, including the Canaan and Beecher Falls LPOEs to the east. The Norton LPOE would remain open during construction; however, temporary operational changes may be necessary to ensure safety and to accommodate construction activities. These could include intermittent or short-term closures of specific areas within the Norton LPOE, which may result in the rerouting of cross-border traffic to other nearby LPOEs. Any such changes would be communicated in advance to minimize disruption to travelers, commercial traffic, and local communities. The addition of construction vehicles and workers commuting to the job site could also contribute to the increase in traffic and disruptions. Trains would continue to be inspected at the RVACIS building south of the Norton LPOE facility throughout the duration of construction. As a result, the Proposed Action Alternative would result in moderate, temporary, regional, adverse impacts on traffic and transportation during construction.

The Proposed Action Alternative would have minor, permanent, local, beneficial impacts on safety, security, and congestion at the Norton LPOE during operation. Issues related to queuing, safety, and security would be addressed to the extent possible with the modernization and expansion. The Proposed Action Alternative would not result in traffic volume impacts on VT Route 147 or VT Route 114. The processing capacity of the Norton LPOE after completion of

the modernization is projected to increase to approximately 12,000 COVs and 31,000 POVs per year (GSA 2024).

3.7.2.2 No Action Alternative

The No Action Alternative would have no effect on traffic or transportation, as GSA would not modernize or expand the Norton LPOE. There would be no effect to vehicle processing times and inspections, and temporary road closures would not be required. The Norton LPOE would operate under the existing conditions.

3.8 Visual Resources and Aesthetics (Including Lighting/Night Skies)

This section assesses current visual resources and aesthetics (including dark skies) at the Norton LPOE and surrounding vicinity and evaluates how aesthetics and dark skies would be affected by the construction and operation of a new LPOE facility. It considers potential changes in lighting, design, and overall appearance of the LPOE during both construction and long-term operations.

3.8.1 Affected Environment

The ROI for visual resources and aesthetics encompasses a 600-foot viewshed surrounding the Proposed Project Area, which consists of the LPOE Main Building and the facility garage, the highways and private residential and commercial properties surrounding the Norton LPOE facility, and the Norton Town Hall. The ROI for lighting and night skies encompasses the skies above the Norton LPOE facility and the surrounding private properties.

Aesthetic features of the Norton LPOE property are dominated by the LPOE Main Building, facility garage, and the employee/visitor overflow parking area. VT Route 147 is at-level with the Norton LPOE property. Views of the property from the south are clear starting from 600 feet away, as the highway is at an elevation above the Norton LPOE property. Beyond 600 feet south of the facility, the view becomes blocked due to a change in elevation. Views from the west along Nelson Road to its terminus at VT Route 147 are clear up to approximately 170 feet away, as the town highway is slightly lower in elevation relative to the Norton LPOE property. Views from the east traveling along VT Route 114 are screened by trees and vegetation until the junction with VT Route 147, at which point the view of the Norton LPOE facility opens to the northwest.

Visual resources include protected landscapes or features that are valued for their aesthetics and historic resources where the visual setting of the resource may change because of the project. There are no identified protected landscapes within the 600-foot viewshed of the Norton LPOE under the Proposed Action Alternative.

The Norton LPOE is in a rural, wooded area with small groups of structures for public, commercial, and residential use and many large, open fields for cattle and crop farms, which provide expansive viewsheds into the surrounding area. Aboveground utility lines run along both

VT Route 147 and VT Route 114. Natural features consist mostly of grassy and wooded rolling hills with small, scattered wetlands. The Coaticook River flows from south to north through the town of Norton and across the United States–Canada border west of the Norton LPOE and the SLR.

Light fixtures are present on the exterior of the LPOE Main Building and in parking areas on the property. The lighting fixtures help to provide safety and security at the border facility to reduce illegal crossings at night and assist with nighttime inspections. Current facility lighting is oriented downward to minimize light pollution to the surrounding area. The Norton LPOE is in a rural area of Vermont, and the surrounding area has minimal light pollution obscuring views of the night sky in the region. As the dominant light source in the region, the Norton LPOE can contribute to sky glow. Sky glow is the diffuse luminance of the night sky, apart from discrete light sources such as the Moon and visible individual stars. Sky glow in this region is more limited compared to urban areas, contributing to the dark night skies. However, even lighting with shielding or lighting that is oriented downward can contribute to sky glow.

3.8.2 Environmental Consequences

3.8.2.1 Proposed Action Alternative

Construction under the Proposed Action Alternative would have temporary, moderate, site-specific, adverse impacts to visual resources and aesthetics. Immediately following contractor mobilization and throughout the construction phase, conditions within the Proposed Project Area would be disrupted. The visual and aesthetic characteristics of this area (i.e., construction zone) would be altered by installation of temporary construction trailers, the use of equipment involved in preparing the area for development (e.g., ground clearing, grading, and excavating), the delivery and stockpiling of construction materials and equipment, internal access drives and parking areas, and similar activities. The duration of such impacts would extend for the period devoted to construction. No additional visual and aesthetic impacts would be anticipated once construction is completed.

The Proposed Action Alternative would alter the existing visual landscape by replacing the existing Norton LPOE with a modernized facility. The new Norton LPOE would be no more than two stories in height. Additionally, the improved facility would be designed to reduce light pollution and light trespass consistent with current PBS Interim Core Building Standards. However, industrial-grade lighting is required at the LPOE facility so that CBP can monitor the border at night, and additional lighting would likely be necessary. This lighting would be shielded, pointed downward at night, and have other mitigation measures, as identified in Section 5.0, to reduce direct light pollution and sky glow. There are no protected landscapes within the 600-foot viewshed that would be impacted. Therefore, because of the Proposed Action Alternative, impacts to visual resources and aesthetics, including lighting and night skies, would

be permanent, minor, site specific, and adverse in the immediate vicinity of the LPOE. BMPs and other impact-reducing factors may lower the impacts.

3.8.2.2 No Action Alternative

The No Action Alternative would have no effects on visual resources and aesthetics, as GSA would not modernize or expand the Norton LPOE. Routine repairs and maintenance of the existing facility would continue per the current site management plan, and the Norton LPOE would operate under the existing conditions. GSA and CBP would continue to implement design standards, BMPs, and mitigation measures designed to reduce the impacts of light pollution on the surrounding community.

3.9 Solid Waste and Hazardous Materials

The following section assesses solid waste and hazardous materials in the vicinity of the Proposed Project Area. It considers solid waste and hazardous materials that would be generated during demolition, construction, and long-term operation of a modernized Norton LPOE.

3.9.1 Affected Environment

The ROI for solid waste and hazardous materials is the Proposed Project Area and adjacent areas.

GSA conducted a Phase I Environmental Site Assessment within the Proposed Project Area on November 17, 2023. No Recognized Environmental Conditions (RECs) or Controlled RECs were found during the assessment. A REC is a hazardous substance or petroleum product that is present or is likely to be present on a property. Historical RECs identified during the Phase I Environmental Site Assessment include an active 550-gallon fuel oil underground storage tank at the Norton LPOE facility. Soil sampling was conducted, and no detectable concentrations of petroleum contamination were found. Sampling of the on-site water supply well was conducted, and no target volatile organic compounds were found.

Based on the Phase I Environmental Site Assessment, the Norton LPOE is assumed to generate minimal hazardous waste. No evidence of filling was observed on the Norton LPOE property, and there was no sign of wastewater discharge other than sanitary waste being generated at the Norton LPOE property. The assessment identified the presence of a septic tank, where wastewater is likely treated, and a leach field on the west side of the Norton LPOE. No indications of industrial wastewater generation or discharge were observed. Asbestos-containing materials (ACM) associated with buildings, including roofing materials and window glazing, were identified on the Norton LPOE property. Any suspected ACM identified during construction or renovation activities performed in the future are subject to applicable state and federal regulations concerning the disturbance or removal of suspected ACM.

There is one solid waste landfill site within approximately 0.5 miles of the Proposed Project Area (Norton Transfer Station). The landfill currently has more than adequate capacity for the solid waste that would be generated from the Proposed Action Alternative (VTANR 2014).

3.9.2 Environmental Consequences

3.9.2.1 Proposed Action Alternative

Demolition and construction activities would require the use of hazardous materials, such as solvents, acids, industrial caustic chemicals, and would generate hazardous wastes, which would result in short-term, negligible to minor, local, adverse impacts due to the potential increase in such materials and wastes. Contaminated soils may be encountered during excavation activities, and removal of contaminated soil would represent a long-term, moderate, local, beneficial impact to human health and safety. Any spills or releases of petroleum, oils, lubricants, hazardous materials, pollutants, or contaminants would be handled in accordance with measures outlined in an SPCC plan prepared for construction.

According to CBP and GSA standards, all nonhazardous construction and demolition waste would be recycled to the maximum extent feasible. It is assumed that all construction and operational waste generated because of the Proposed Action Alternative would be disposed of at the Norton Transfer Station. Standing solid waste could contribute to potential effects to soil and water via residual contaminant runoff due to surface water. Therefore, to mitigate contaminant runoff from solid waste, the solid waste would be removed regularly and hazardous waste separation BMPs would be administered to appropriate materials. The resulting solid waste would be removed and hauled to the Norton Transfer Station for disposal. The volume of solid waste would not be substantial and would be easily accommodated by existing waste disposal contractors. The disposal of waste would follow current standards and regulations. As such, the effects of additional solid waste would be adverse, local, long-term, and negligible, while the reduction of waste generation would be beneficial.

The operation of the modernized and expanded Norton LPOE would not involve the use, storage, or handling of hazardous materials beyond typical quantities associated with routine building maintenance (e.g., cleaning supplies). Solid waste generation during operations would be similar to current levels, and current collection and disposal at the Norton Transfer Station would continue. As such, no impacts related to hazardous materials are anticipated under the Proposed Action Alternative.

3.9.2.2 No Action Alternative

The No Action Alternative would have no effects on solid waste and hazardous materials, as GSA would not modernize or expand the Norton LPOE. Routine repairs and maintenance of the existing facility would continue under the current site management plan, and the Norton LPOE would operate under the existing conditions. Ongoing maintenance activities require hazardous

materials usage and generate negligible amounts of hazardous waste. There is the potential for spills to occur; however, measures are in place to address these risks.

3.10 Utilities

This section describes the baseline conditions for infrastructure and utility resources and assesses potential impacts on infrastructure and utilities that could result from implementing the Proposed Action Alternative and No Action Alternative. Utilities refer to the water and sewer, natural gas, electricity, stormwater, and communication systems that serve the Proposed Project Area.

3.10.1 Affected Environment

The ROI includes infrastructure and utilities used by the existing Norton LPOE and other infrastructure and utilities located within or adjacent to the Proposed Project Area.

Property development at the Norton LPOE includes, but is not limited to, an LPOE Main Building, inspection area, garage building (loading dock/inspection station), and a fenced aboveground propane tank/generator enclosure. Building heating is provided by an underground number 2 fuel oil storage tank and a geothermal well. Electrical services are provided by Vermont Electric Cooperative. An electric pole on the corner of Nelson Road and Route 147 provides three-phase power to the Norton LPOE. In the event of an electrical outage, emergency power is provided by a propane-fueled generator.

Drilled in 1933, a water supply well, which supplies the Norton LPOE with both drinking water and fire-protection water, is located beneath the LPOE Main Building. Wastewater is collected and treated in a septic tank and leach field (Griffin 1999).

At present, Norton receives landline telephone and broadband internet services from Consolidated Communications, Inc. Cable television service is not available in the town of Norton (Town of Norton 2019).

3.10.2 Environmental Consequences

3.10.2.1 Proposed Action Alternative

Modernization and expansion of the Norton LPOE would result in short-term, minor, site-specific, adverse impacts on utility infrastructure in the Proposed Project Area during construction to meet the Norton LPOE's design and operational needs. Existing infrastructure would be demolished, as necessary, and new infrastructure would be constructed to meet GSA and CBP requirements.

Construction at the Norton LPOE would have short-term, minor, local, adverse impacts on utilities from increasing demand on services. Water usage would be required for construction-related activities, such as dust suppression, soil compaction, concrete work, equipment washing, and potable uses for construction workers, resulting in an increased demand on water utilities. It

is assumed that all water for construction would be trucked in from local sources with sufficient capacity. There would also be a slight increase in demand for wastewater services from the hauling of portable toilets.

Construction at the Norton LPOE (including activities such as excavation, drilling, and other aboveground and belowground work) would have the potential to cause short-term, minor, local, adverse impacts to utility services for nearby property owners and neighboring communities. The Proposed Action Alternative may require the temporary relocation or reconnection of existing utilities, which could involve short-term service interruptions. Existing utility maps would be reviewed and, where needed, utility companies would be contacted to identify any locations where construction activities would have the potential to affect utility lines. Where feasible, protective measures would be implemented to maintain service during construction. In cases where service interruptions are unavoidable, they would be temporary, scheduled in advance, and communicated clearly to minimize disruption.

Under the Proposed Action Alternative, on-site utilities would be upgraded or replaced with newer, more modernized systems, resulting in permanent, major, site-specific, beneficial impacts to utility infrastructure. The upgrades would substantially improve service reliability, system capability, and energy efficiency, replacing aging infrastructure with modern, resilient systems capable of meeting long-term operational needs. Demand for electricity is expected to increase from the operation of the modernized and expanded Norton LPOE; however, this demand from larger facilities would be offset by a more energy efficient facility design. A new service transformer and new generators would be potentially installed to meet the estimated electricity demand and provide backup power for the entire Norton LPOE site. GSA would provide a new source of potable and non-potable water for the Norton LPOE. It is anticipated that water would be obtained from an on-site well and storage system. New utilities would be constructed or installed in accordance with applicable local and state regulations. New electrical services would be established in conjunction with the local utility company, Vermont Electric Cooperative. Fiberoptic upgrades may be required depending on the ability of the current telecommunications provider to service the modernized and expanded Norton LPOE. All communication upgrades would be contained within the Proposed Project Area.

New buildings would be designed to comply with current building codes and PBS Interim Core Building Standards. Energy and water efficiency measures would be incorporated into the design, which would minimize impacts from increased utility demands because of the expanded facility size. Although the extent of impacts on utilities would depend on overall usage and the extent of efficiency improvements, Norton LPOE operations are not anticipated to noticeably affect the ability of utility providers or on-site systems to provide service.

3.10.2.2 No Action Alternative

The No Action Alternative would have no effects on utilities, as GSA would not modernize or expand the Norton LPOE. Routine repairs and maintenance of the existing facility would be conducted per the existing site management plan, and the Norton LPOE would operate under the existing conditions.

3.11 Recreation

This section discusses the affected environment and environmental consequences for recreation resources, activities, and opportunities available in and around the Proposed Project Area.

3.11.1 Affected Environment

The ROI includes recreational resources near the Norton LPOE. Northeastern Vermont, including Essex, Caledonia, and Orleans counties, and the Eastern Townships of Quebec, Canada, define the ROI for recreational resources. Snowmobiling, skiing, snowboarding, ice skating, fishing, hunting, cycling, hiking, snowshoeing, and kayaking are some of the more popular outdoor recreational activities in the region surrounding the Norton LPOE (Vermont Vacation 2024; Eastern Townships 2024b). Many people from Quebec, Canada, cross into the United States using the Norton LPOE to access these outdoor recreational opportunities, while many people from Vermont cross into Quebec to do the same. In Vermont, recreational activities take place within the town of Norton's two state Wildlife Management Areas (WMAs) and one state forest: the Averill Mountain WMA, approximately 4 miles east of the Norton LPOE; the Bill Sladyk WMA, approximately 13 miles south of the Norton LPOE; and the Black Turn Brook State Forest, approximately 1.6 miles southwest of the Norton LPOE. Quebec draws in many residents from Vermont into its Eastern Townships region to access Parc National de Mont-Orford and ski resort, approximately 38.7 miles northwest of the Norton LPOE (Sépaq 2024), and to visit Lake Lyster Beach, approximately 8.5 miles northwest of the Norton LPOE (Eastern Townships 2024b).

VAST manages a system of snowmobiling trails in Vermont, which are open for snowmobilers from mid-December to mid-April. Trail 105A crosses the border into Quebec using the Norton LPOE (VTVAST 2024). This trail connects to Quebec's system of snowmobiling trails managed by the Quebec Federation of Snowmobile Clubs (Fédération des clubs de motoneigistes du Québec) (FCMQ 2024).

Norton Pond, a popular regional fishing destination, is approximately 7.5 miles south of the Norton LPOE on VT Route 114. The Vermont Agency of Natural Resources manages a boat ramp that provides recreational boaters with access to Norton Pond. Visitors from Quebec enter the United States via the Norton LPOE to access Norton Pond, as the Norton LPOE provides the most direct route to the pond from towns north of the United States–Canada border (VTANR 2024a). Lake Lyster is a popular lake destination in Quebec, with a beach that offers residents in

Vermont swimming, kayaking, boating, and fishing opportunities. Lake Lyster is approximately 8 miles northwest of the Norton LPOE (Eastern Townships 2024a).

The nearest ski resort to the Norton LPOE in Vermont is the Burke Mountain Ski Resort, which is approximately 36 miles south of the Norton LPOE on VT Route 114. The ski resort attracts many visitors from Quebec because it is one of the closest ski resorts in the United States to many towns just north of the United States–Canada border. The nearest ski resort to the Norton LPOE in Quebec is the Mont-Orford Ski Resort, which is approximately 40.8 miles northwest of the Norton LPOE. This resort attracts residents in Vermont seeking to explore skiing opportunities in the Eastern Townships region of Quebec (Mont-Orford 2024).

Mountain biking is a popular outdoor recreational activity in Vermont. The Kingdom Trail Association, a nonprofit organization founded in 1994, manages over 100 miles of nonmotorized, multiuse trails throughout the area around Burke, Vermont, approximately 36 miles south of the Norton LPOE (Kingdom Trails 2024). Another popular outdoor recreational activity in the area is hiking. Northern Vermont has hundreds of miles of hiking trails, and hikers access these trails during all seasons for leisure, exploration, hunting, leaf peeping (viewing fall foliage), and wildlife viewing. These mountain biking and hiking trails also attract many residents living in Quebec, Canada (Green Mountain Club 2024).

3.11.2 Environmental Consequences

3.11.2.1 Proposed Action Alternative

The Proposed Action Alternative would not require a full closure of the existing Norton LPOE during construction and therefore would not result in any long-term detours. The snowmobiling industry could experience short-term adverse impacts due to the Proposed Action Alternative, which would result in temporary, regional, and moderate to major adverse impacts to the snowmobile trail system, specifically trail 105A and its users, as the trail may need to be rerouted depending on the reconfiguration or relocation of portions of Marsh Road (VTVAST 2024). As a result of the temporary disruptions to the snowmobile trail system during construction, users would experience short-term, minor, regional, adverse impacts. These could include reduced access, limited route continuity, or inconvenience due to detours or closures during the construction period.

Access to other recreational resources in the region, such as skiing and trail locations, are not expected to be affected by the Proposed Action Alternative. Travelers will continue to access these destinations via the Norton LPOE. Should travelers opt to avoid construction at the Norton LPOE, other Canadian road networks and nearby ports may be selected. As a result, adverse impacts to these recreational areas would be short-term, negligible, and localized, if they occur at all.

Temporary impacts would cease once the modernized and expanded Norton LPOE is constructed. Shorter processing times would result in permanent, minor, beneficial impacts to those crossing the border for recreational purposes. The Proposed Action Alternative would have permanent, beneficial impacts resulting from the modernized and expanded Norton LPOE.

3.11.2.2 No Action Alternative

The No Action Alternative would have no effects on recreation resources, as GSA would not modernize or expand the Norton LPOE and temporary port closures would not be required. Routine repairs and maintenance of the existing facility would be conducted, and the Norton LPOE would operate under the existing conditions.

3.12 Wildlife and Habitat

This section discusses the affected environment and environmental consequences that would result under the Proposed Action Alternative for biological resources in and near the Proposed Project Area, including vegetation, wildlife, and special status species. Special status species include federal- and state-listed species and migratory birds.

3.12.1 Affected Environment

The ROI includes the immediate project footprint, as well as adjacent and nearby habitats that could be influenced by construction activities, changes in land use, human presence, noise, and light.

Although the Proposed Project Area consists primarily of previously developed land fragmented by roadways, buildings, and associated infrastructure, the Norton LPOE site is within a broader landscape that supports some of the most extensive and intact natural habitats in the state of Vermont. Surrounding the Proposed Project Area are large tracts of contiguous forest, wetland complexes, and upland habitats, many of which are managed as state or federally protected lands. This broader landscape provides essential habitat connectivity and supports a diverse array of native wildlife species, including threatened and endangered species.

3.12.1.1 General Wildlife and Habitat

The existing Norton LPOE and its associated infrastructure occupy a previously developed parcel that includes paved areas, buildings, maintained lawn, and access roads. As a result, the immediate project footprint offers limited high-quality habitat for wildlife. Vegetation within the developed zone is dominated by managed grasses and scattered ornamental or early successional species. Despite these disturbances, the Proposed Project Area may still provide limited foraging habitat or movement corridors for common edge-dwelling species, such as white-tailed deer (*Odocoileus virginianus*), eastern wild turkey (*Meleagris gallopavo silvestris*), eastern cottontail (*Sylvilagus floridanus*), and raccoons (*Procyon lotor*). Moose have also been observed at the existing Norton LPOE.

Around the existing Norton LPOE, the landscape transitions into a mixed northern hardwood-conifer forest, providing valuable habitat for a wide variety of wildlife, including large mammals, small mammals, migratory birds, amphibians, and reptiles (Vermont Fish & Wildlife Department 2025). Several intermittent streams and small wetlands are present in the Proposed Project Area (Figure 3-5), supporting hydrophilic vegetation and offering breeding habitat for amphibians and aquatic invertebrates. These habitats also serve as foraging grounds for birds and mammals and as stopover sites for migratory species.

Although the existing Norton LPOE site is developed and experiences regular vehicle and pedestrian activity, it is located within a broader, high-value ecological context. Several state-managed and privately conserved lands are located within approximately 5 to 10 miles of the Norton LPOE. The proximity to protected lands, such as state forests and private conservation lands, enhances the ecological integrity of the region and increases the likelihood that sensitive species could be present in the broader area, even if not within the immediate project footprint.

3.12.1.2 Federally Listed Species

As noted in Section 1.4.5, an official species list obtained from USFWS identified three federally listed species as potentially occurring within the 4.73-acre Proposed Project Area in Norton, Vermont: Canada lynx, northern long-eared bat, and monarch butterfly (USFWS 2025c; Appendix C).

The Canada lynx is listed as threatened under the ESA. The species has a low and patchy population in the contiguous United States, with the largest numbers occurring in the northern Rocky Mountains, Great Lakes, and parts of New England (USFWS 2025a). In Vermont, Canada lynx are considered rare, with occasional verified observations in Essex County and surrounding areas. Lynx rely on dense boreal forest habitats, especially spruce-fir stands with deep snow cover and a stable population of snowshoe hare (*Lepus americanus*) (USFWS 2025a). Although no critical habitat is designated in Vermont, the broader landscape surrounding the 4.73-acre Proposed Project Area consists of largely undeveloped forest and offers high-quality habitat that support lynx foraging and dispersal. However, the Proposed Project Area is fragmented and partially developed, containing existing infrastructure, residential homes, and human activity. These characteristics make the site unsuitable for regular lynx use, as the species is highly sensitive to human disturbance and typically avoids areas with residential or commercial activity (National Wildlife Federation 2025). Although the Proposed Project Area may occasionally be traversed by lynx moving through the region, no core habitat features are present within the site, and regular use by the species is unlikely.

The northern long-eared bat is listed as endangered, primarily due to severe population declines caused by white-nose syndrome. During the summer months and portions of the fall and spring, northern long-eared bats may be found roosting singly or in colonies underneath bark, in cavities or in crevices of both live trees and snags, or dead trees (USFWS 2025b). The species spends

winters hibernating in caves and mines, called hibernacula (USFWS 2025b). Although the broader region of Essex County provides suitable summer habitat, the Proposed Project Area lacks significant forested cover and is mostly developed, reducing the potential for roosting or foraging habitat.

The monarch butterfly is proposed for listing as threatened under the ESA due to population declines across North America, with key threats including habitat loss and widespread pesticide and herbicide use. Monarch butterflies occur in Vermont during the summer breeding season, typically from June through September. Monarch butterfly breeding and migratory habitat generally consists of meadows with a diversity of nectar-producing flowering vegetation and adequate abundance of milkweed (USFWS 2020). Monarch butterflies of the eastern population typically leave temperate northern climates in the fall for wintering areas in Mexico (USFWS 2020). Due to the developed nature of the Proposed Project Area, monarch butterfly habitat is likely to be minimal or absent. However, if undeveloped margins, maintained lawns, or landscape areas contain milkweed or flowering plants, the site could offer limited foraging or breeding habitat during the summer.

3.12.1.3 State-Listed Species

The Vermont Fish & Wildlife Department maintains a list of species that are classified as endangered or threatened under the Vermont Endangered Species Law (Title 10 V.S.A. Chapter 123). A review of available data from the Vermont Natural Heritage Inventory indicates that several state-listed species have been documented in Essex County and that suitable habitat for some species may occur in the broader region. Ten species of rare or very rare plants have been identified in the Border Management Unit. Three of these are listed as “threatened” by the state of Vermont endangered species statute (Title 10 V.S.A. Chapter 123). Fifty-one wildlife species found in the Border Management Unit are considered “species of greatest conservation need” in Vermont. Of these, 15 are listed as “special concern,” “threatened,” or “endangered” by the state of Vermont. However, the Proposed Project Area comprises approximately 4.73 acres and is primarily developed, with limited natural vegetation or intact ecological communities. Therefore, there is limited potential for state-listed species to occur within the project footprint.

3.12.1.4 Migratory Birds

Migratory bird species that could be seasonally present in the Proposed Project Area include the bald eagle (*Haliaeetus leucocephalus*), bay-breasted warbler (*Setophaga castanea*), black-billed cuckoo (*Coccyzus erythropthalmus*), bobolink (*Dolichonyx oryzivorus*), Canada warbler (*Cardellina canadensis*), chimney swift (*Chaetura pelagica*), evening grosbeak (*Coccothraustes vespertinus*), olive-sided flycatcher (*Contopus cooperi*), rose-breasted grosbeak (*Pheucticus ludovicianus*), veery (*Catharus fuscescens fuscescens*), and wood thrush (*Hylocichla mustelina*). These species are most likely to be present in the vicinity of the Proposed Project Area from late May through August, although some may be present earlier or later in the year (USFWS 2025c).

USFWS considers all these species to be Birds of Conservation Concern except the bald eagle, which is protected under the Bald and Golden Eagle Protection Act (USFWS 2021).

3.12.2 Environmental Consequences

3.12.2.1 Proposed Action Alternative

The Proposed Action Alternative would involve the clearing of natural vegetation and tree removal, as well as the addition of impervious surfaces, resulting in the loss of structural habitat features, such as canopy cover, understory vegetation, and downed woody debris, that provide shelter and nesting opportunities for various wildlife. The project would also result in the permanent loss of approximately 0.34 acres of wetlands and 396 linear feet of tributary channels due to the placement of fill. These changes could degrade water quality and reduce vegetation cover, thereby limiting foraging and shelter opportunities for wildlife. Such alterations would temporarily increase stress, disrupt behavior, and potentially displace individuals to adjacent habitats, leading to short-term, minor, localized, adverse impacts.

Despite these effects, the overall impact on wildlife would be expected to be limited. The affected upland habitat comprises a small portion of the larger landscape, which includes extensive and high-quality habitat available for wildlife use. The project footprint is largely developed or previously disturbed, further reducing habitat value. Long-term impacts would be anticipated to be negligible, as there is no expected substantial increase in traffic or activity levels following completion of the project, and normal ecological function is expected to resume in adjacent areas.

Impacts to federally and state-listed species would mirror those described above. Although occasional dispersal of species, such as the Canada lynx, through the region may occur, the scale and location of the Proposed Action Alternative are not expected to impede habitat connectivity or movement at the landscape level. No designated critical habitat exists within the Proposed Project Area. The northern long-eared bat may experience localized effects due to potential removal of individual roost trees within partially vegetated or edge areas, but impacts would be minor given the limited scope of tree clearing and largely developed nature of the site. Monarch butterflies may occasionally use early successional or open habitats for foraging, but such habitats are limited within the Proposed Project Area. Similarly, while the incidental loss of individual state-listed plant species could occur, the likelihood is low due to the small footprint and lack of unique or high-quality habitat features.

Migratory bird species may be temporarily disturbed by vegetation clearing and construction-related noise, vibration, and human activity, particularly during nesting or migration periods. However, these impacts would be short-term, negligible, and localized, with conditions returning to baseline following construction. Overall, while the Proposed Action Alternative would result in temporary and localized habitat loss and disturbance, it would not be expected to affect wildlife populations or species viability at a broader scale.

3.12.2.2 No Action Alternative

The No Action Alternative would have no effects on wildlife or wildlife habitat, as GSA would not modernize or expand the Norton LPOE. Routine repairs and maintenance of the existing facility would continue per the current site management plan, and the Norton LPOE would operate under the existing conditions.

3.13 Air Quality

The ROI includes the Proposed Project Area and surrounding vicinity where construction activities and vehicle emissions could measurably affect ambient air quality, generally extending up to a few miles downwind depending on local meteorological conditions. This section describes the baseline conditions for air quality in and surrounding the Proposed Project Area. The air quality of a given location is determined by the concentration of various pollutants in the atmosphere. The Clean Air Act, last amended in 1990, requires the USEPA to set standards for six criteria pollutants that can be harmful to public health and the environment. National Ambient Air Quality Standards (NAAQS) are established by the USEPA for these criteria pollutants, including ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, particulate matter of 10 microns (PM_{10}) and 2.5 microns ($PM_{2.5}$) in diameter, and lead. NAAQS represent maximum levels of background pollution that are considered safe, within an adequate margin of safety, to protect public health and welfare.

3.13.1 Affected Environment

Air quality is affected by stationary sources (e.g., urban and industrial development) and mobile sources (e.g., motor vehicles). Air quality at a given location is a function of several factors, including the quantity and type of pollutants emitted locally and regionally, and the dispersion rates of pollutants in the region. Primary factors affecting pollutant dispersion are wind speed and direction, atmospheric stability, temperature, the presence or absence of inversions, and topography. Vermont is located within an attainment area for all six criteria pollutants, including ozone, carbon monoxide, nitrogen oxides, sulfur oxide, PM_{10} and $PM_{2.5}$, and airborne lead. These pollutants do not occur within or around the Proposed Project Area at levels warranting detailed evaluation (Vermont DEC 2025a).

3.13.1.1 Clean Air Act Amendments

The Clean Air Act Amendments of 1990 place most of the responsibility to achieve compliance with NAAQS on individual states. To this end, the USEPA requires each state to prepare a State Implementation Plan (SIP). A SIP is a compilation of goals, strategies, schedules, and enforcement actions that will lead the state into compliance with all NAAQS. Areas not in compliance with a standard can be declared nonattainment areas by the USEPA or the appropriate state or local agency. To reach attainment, NAAQS may not be exceeded more than once per year.

Compliance with the NAAQS is based on data from ambient air monitoring stations located throughout the state, including monitoring stations in Underhill, Rutland, and Bennington, Vermont. The Air Quality and Climate Division within the Vermont DEC enforces air quality regulations in Vermont and monitors air quality by maintaining an air quality monitoring program (Vermont DEC 2025b).

The USEPA General Conformity Rule (40 CFR Part 93, Subpart B for federal agencies and 40 CFR Part 51 for state requirements) requires all federal agencies to ensure that any agency action or activity conforms to an approved SIP. This applies only to federal actions in nonattainment or maintenance areas. The General Conformity Rule requires analysis of total emissions of criteria pollutants, including precursors, when determining the conformity of the Proposed Action Alternative. The General Conformity Rule applies if the action's emissions are greater than 10 percent of an area's total emissions of a given pollutant and are considered "regionally significant" or if emissions exceed de minimis thresholds. If de minimis thresholds are exceeded, a conformity decision shall be made.

3.13.1.2 Local Air Quality

Air pollution originates from motor vehicles, building heating systems, manufacturing, and industrial production. Vermont's air quality is also affected by emissions that occur outside of the state, from sources such as electricity generating facilities and wildfires. The weather also plays an important role as high winds and weather fronts move pollutants out of the state, while stagnant weather systems can cause pollutants to linger and accumulate, particularly in mountain valley areas (VDEC 2025a).

The closest ambient air monitoring system to the Norton LPOE is the Underhill monitoring station at the Proctor Maple Research Center located approximately 62 miles southeast of Norton (USEPA 2025a). Currently, the entirety of Vermont, including the Proposed Project Area, is in attainment for all criteria pollutants, including ozone, carbon monoxide, nitrogen oxides, sulfur oxide, PM_{10} and $PM_{2.5}$, and airborne lead. These pollutants do not occur within or around the Proposed Project Area at levels warranting detailed evaluation (USEPA 2025b and Vermont DEC 2025a).

3.13.1.3 Emissions at Norton LPOE

The operations and maintenance of the Norton LPOE building and the use of government-owned vehicles and POVs currently contribute to the emissions in the Proposed Project Area. Such emissions are considered minor on a regional scale and remain compliant with USEPA and Vermont DEC air quality regulations.

3.13.2 Environmental Consequences

3.13.2.1 Proposed Action Alternative

Short-term construction-related fugitive dust and criteria air pollutant emissions would be generated during the proposed site preparation activities, including the demolition of the existing LPOE building and hardscaping and removal of existing landscaping. Additional construction-related emissions would result from the extension of domestic water, sewer, fire water, and electrical/communication utilities, construction of the LPOE Main Building, garage, and other support facilities, installation of site lighting, and paving of new roads, parking spaces, and laydown areas.

The heavy construction equipment fleet mix, hours of construction, and operating conditions would vary during the implementation phases of the Proposed Action Alternative. Although not currently known, the number of construction personnel and the timing of construction activities would be determined upon completion of engineering design and the selection of a contractor by CBP.

Operation of construction equipment with internal combustion engines and off-site vehicles (e.g., construction employee vehicles, delivery trucks) would result in emission of criteria air pollutants. In addition to on-site construction emissions, regional emissions would occur associated with haul truck trips for the delivery of supplies and removal of solid waste (e.g., construction and demolition debris). Nevertheless, due to the short-term nature of the proposed construction activities, combustion emissions would be considered a short-term, minor, local, adverse impact on air quality.

Temporary impacts would cease once the modernized and expanded Norton LPOE is constructed. Shorter processing times would result in permanent, regional, beneficial impacts to air quality due to lower emissions from queuing vehicles. The Proposed Action Alternative would have permanent, regional, beneficial impacts on air quality resulting from the modernized and expanded Norton LPOE.

3.13.2.2 No Action Alternative

The No Action Alternative would have no effects on air quality, as GSA would not modernize or expand the Norton LPOE. Routine repairs and maintenance of the existing facility would continue per the current site management plan, and the Norton LPOE would operate under the existing conditions.

3.14 Noise

This section describes the baseline conditions for noise in and surrounding the Proposed Project Area. Sound becomes noise when it is perceived as an interference with communication, poses a threat to everyday quality of life, damages the ability to concentrate, or is excessive or

continuous. Sound and noise levels typically are measured in decibels. The degree to which noise will disrupt an area is dependent on the perception of the people living in the affected area. Noise receptors represent noise sensitive locations, such as a residential backyard or a library (FHWA 2018). Response to noise varies depending on the type and characteristics of the noise, distance between the noise source and the receptor, receptor sensitivity, and time of day. Because the human ear is more sensitive to certain ranges of the sound spectrum, a weighted scale has been developed to more accurately measure human perception of sound. This measurement is called A-weighted decibels (dBA). The threshold of audibility is generally within the range of 10 to 25 dBA for normal hearing. The upper boundary of audibility is 135 dBA and can be painfully loud (USEPA 1981). Sounds encountered in daily life and their dBA levels are provided in Table 3-6.

Table 3-6. Common Sounds and Their Sound Levels

Sound	dBA
Quiet library, soft whispers	30
Quiet room	40
Normal conversation	60
Air conditioner at 20 feet, sewing machine	60
Vacuum cleaner, hair dryer, noisy restaurant	70
Moderate traffic	75
Heavy traffic	85
Subway, motorcycle, truck traffic, lawn mower	90–100
Garbage truck, pneumatic drill	100
Chainsaw	110
Rock band concert in front of speakers, thunderclap	120
Emergency response siren, jet takeoff	120
Jackhammer	130

Source: ResearchGate 2025
Key: dBA = A-weighted decibel

3.14.1 Affected Environment

The ROI for noise is limited to the Proposed Project Area and the adjacent environments that may be exposed to noise generated from the Norton LPOE construction and operational activities. The Proposed Project Area is adjacent to a small group of residential properties to the east and a small group of commercial, institutional, industrial, and residential properties to the south.

Noise within the ROI is generated mostly by automobile and truck traffic along VT Route 114 and VT Route 147. The closest noise sensitive receptor to the Proposed Project Area is the Norton Town Hall, approximately 200 feet south of the Proposed Project Area, while the closest noise sensitive residential receptor is approximately 260 feet south of the Proposed Project Area.

3.14.2 Environmental Consequences

3.14.2.1 Proposed Action Alternative

Noise generation due to construction would be temporary, only lasting for the duration of construction activities. Increases in noise levels would occur intermittently during construction. Noise from construction would vary depending on the type of equipment being used, the area in which the activity would occur, and the distance of the receptor from the noise source. Heavy construction equipment would be periodically used during construction; therefore, noise levels would fluctuate.

Noise generated by construction activities has the potential to quickly surpass ambient sound levels. The type and intensity of the sound is dependent on the type of construction activity taking place. Individual construction equipment typically generates noise levels of 65 to 96 dBA at a distance of 50 feet, and locations more than 1,000 feet from construction sites seldom experience significant levels of construction noise (i.e., greater than 65 dBA) (FHWA 2017).

Construction equipment noise impacts on sensitive receptors would be minor because of the minimal aggregate contribution of the construction equipment to existing ambient noise levels from traffic and the use of noise attenuation equipment to ensure that noise levels would not exceed an average of 75 dB over an 8-hour period. Construction noise from the proposed improvements to the Norton LPOE would result in short-term, minor, local impacts on the ambient noise environment.

Temporary noise impacts would cease once the modernized and expanded Norton LPOE is constructed. Daily operations would not be expected to add additional noise to the local soundscape, resulting in similar ambient noise levels to existing conditions.

3.14.2.2 No Action Alternative

The No Action Alternative would have no effects on noise, as GSA would not modernize or expand the Norton LPOE. Routine repairs and maintenance of the existing facility would continue per the current site management plan, and the Norton LPOE would operate under the existing conditions.

3.15 Unavoidable Adverse Environmental Effects

Impacts from the Proposed Action Alternative on the environment have been described in detail in the previous individual resource topics in this section. Table 3-7 provides a summary of unavoidable adverse environmental effects of the Project.

Table 3-7. Unavoidable Adverse Environmental Effects

Resource	Unavoidable Effects
Land Use and Zoning	Relocation of Marsh Road would result in a **permanent, minor, localized, adverse** shift in land use within the immediate Proposed Project Area.
Geology, Topography, and Soils	The Proposed Action Alternative would have **short-term, minor, site-specific, adverse** effects on geology during demolition and construction activities because of excavation. During construction, the effect to topography from grading would be **permanent, minor, site specific,** and **adverse.** The Proposed Action Alternative would be anticipated to result in **permanent, minor, site-specific, adverse** effects to soils due to the loss of topsoil, excavation, and grading.
Water Resources	Ground-disturbing activities, such as clearing, excavating, grading, and adding impervious surface, for the new LPOE facility, would result in **minor, short- and long-term, localized, adverse** effects on surface water resources. After construction, the long-term effects of the Proposed Action Alternative would result in small reductions of ground recharge from the addition of impervious surfaces to the Proposed Project Area. However, these **adverse** effects would be **short-term** and **negligible**.
Cultural Resources	The Proposed Action Alternative would include the full demolition of the historic LPOE Main Building, resulting in **major, permanent, site-specific, adverse** effects to cultural resources.
Socioeconomics	The Proposed Action Alternative would have **long-term, moderate, site-specific, adverse** effects to private citizens whose property is acquired for the Project. There would be **long-term, minor, localized** and **regional, adverse** effects to socioeconomics due to the loss of real estate tax revenue from the replacement of private property with federal property. There would additionally be **short-term, minor, site-specific, adverse** effects to access due to lane closures, detours, and construction vehicles using local roads.

Resource	Unavoidable Effects
Traffic and Transportation	During construction, there would be **moderate, temporary, regional, adverse** effects on traffic and transportation because of port closures, detours, and traffic delays.
Visual Resources and Aesthetics (Including Lighting/Night Skies)	During construction, there would be **temporary, moderate, site-specific, adverse** effects because construction would detract from views of the surrounding landscape. The Proposed Action Alternative would have **permanent, minor, site-specific, and adverse** impacts in the immediate vicinity of the LPOE due to lighting. Lighting would be shielded, pointed downward at night, and have other mitigation measures to reduce direct light pollution and sky glow.
Solid Waste and Hazardous Materials	Demolition and construction activities would require the use of hazardous materials, therefore resulting in **short-term, negligible to minor, local, adverse** effects.
Utilities	Existing infrastructure would be demolished, as necessary, and new infrastructure would be constructed, resulting in **short-term, minor, site-specific, adverse** effects. Construction at the Norton LPOE would have **short-term, minor, local, adverse** effects on utilities from increasing demand on services and potential disruptions.
Recreation	During construction, users would experience **short-term, minor, regional, adverse** effects because of temporary disruptions to the snowmobile trail system.
Wildlife and Habitat	Alterations of potential habitat would temporarily increase stress, disrupt behavior, and potentially displace individuals to adjacent habitats, leading to **short-term, negligible to minor, localized, adverse** effects.
Air Quality	During construction there would be **short-term, minor, local, adverse** effects due to increased emissions and fugitive dust.
Noise	During construction there would be **short-term, minor, local**, **adverse** effects due to construction activities and the use of construction equipment.

4.0 REASONABLY FORESEEABLE ACTIONS

To identify ongoing and reasonably foreseeable actions that could overlap with impacts from the Norton LPOE modernization and expansion project, GSA coordinated with VTrans, the Quebec Ministry of Transport and Sustainability, and the Town of Norton and conducted a desktop analysis to identify other actions. No potential future projects were determined to be reasonably foreseeable actions resulting from the proposed action.

5.0 MANAGEMENT AND MITIGATION MEASURES

This section summarizes the proposed management and mitigation measures to avoid, minimize, or mitigate potential adverse effects of the Proposed Action Alternative. Under the Proposed Action Alternative, GSA would implement the BMPs listed in Table 5-1 and satisfy all applicable federal, state, and local regulatory requirements associated with the design, construction, and operation of the proposed modernized LPOE. Additional management and mitigation measures may be adopted or required through ongoing agency consultations and stakeholder engagement.

Table 5-1. Best Management Practices and Mitigation Measures

Resource	Mitigation Measures and BMPs
Land Use	GSA would consider local zoning laws for construction and operation of the proposed Norton LPOE and all design requirements of the state and local governments to the extent practicable. GSA would continue coordination efforts during the design and construction processes with town and county governments, the Vermont Department of Transportation, utility providers, and other stakeholders.
Geology, Topography, and Soils	Measures to minimize erosion and sedimentation would use standard BMPs (e.g., earth walls, soil nails, riprap, and turbidity barriers), and other methods as determined during detailed design and applicable NPDES permit requirements.
Water Resources (Including Wetlands and Stormwater)	GSA would use BMPs, such as those listed in the Stormwater Manual for Vermont. This would include using infiltration or filtration practices to reduce suspended solids, phosphorus, and salts. Additionally, GSA would comply with the Vermont Water Quality Standards (Environmental Rule–Chapter 29A), which establish criteria to protect physical, chemical, and biological integrity of the state's surface waters. Any post-construction stormwater management features would be designed in accordance with the Vermont Stormwater Management Manual to ensure long-term control of runoff and water quality. GSA would consider low impact development practices, such as reducing impervious surfaces, using vegetated swales and revegetation, and use of porous pavements. GSA would develop and implement a stormwater pollution prevention plan to control stormwater runoff and pollutants, which would include erosion prevention, sediment control, and water quality protection measures. 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.

Resource	Mitigation Measures and BMPs
Water Resources (Including Wetlands and Stormwater) contd.	GSA would design and develop the project in compliance with Section 438 of the Energy Independence and Security Act of 2007 and would obtain and adhere to all required permits and standards, including those related to the National Pollutant Discharge Elimination System. GSA would mitigate potential adverse impacts to wetlands via payment of fees to a federal "in-lieu fee" program or approved mitigation bank. Compensatory mitigation would be determined by GSA in consultation with the U.S. Army Corps of Engineers and the Vermont Department of Environmental Conservation. GSA would implement a Spill Prevention, Control, and Countermeasure Plan to minimize the potential for adverse effects to groundwater.
Cultural Resources	Through the Section 106 consultation process, GSA would identify impacts on cultural resources and, if necessary, develop a Memorandum of Agreement with the SHPO to identify measures to avoid, minimize, or mitigate adverse effects. If necessary, to protect potential resources from inadvertent disturbance, GSA would require temporary fencing to be placed at a buffered distance of 50 feet (15.24 meters) around the ASAs not directly intersected by the Proposed Action Alternative. All areas of ground disturbance within the intersected ASAs would be subjected to Phase 1B archaeological testing, if required, prior to any ground-disturbing activities to identify any potentially intact subsurface precontact or historic materials that may be eligible for listing in the National Register of Historic Places. In the unlikely event of an unanticipated discovery of cultural resources during construction, GSA would halt work in the immediate vicinity of the suspected cultural resources and protect the resources. Work would not continue in the area of the discovery until a qualified archaeologist could inspect the find, and GSA would notify the SHPO and other consulting parties of the discovery and treat any discovered materials in accordance with applicable state and federal laws.
Socioeconomics	GSA would notify the property owner of its intent to acquire and its appraisal obligations. GSA would determine the amount of just compensation to be offered for the private property; this amount would not be less than the fair market value established by an approved appraisal. GSA would offer relocation assistance services, payments, and other eligible benefits to any displaced persons, per the policies and provisions in the Uniform Act, as needed. A traffic management plan would be prepared prior to the start of construction that would outline the anticipated timing, duration, and proposed phasing of any travel lane closures, traffic detours, and mitigation measures. The modernized LPOE would incorporate signage to assist travelers as to how to navigate the new roadways, including to Marsh Road.

Resource	Mitigation Measures and BMPs
Traffic and Transportation	GSA would mitigate the impacts associated with traffic during construction. Mitigation measures include minimizing construction truck movement during peak traffic hours, placing construction staging areas where they would least interfere with local traffic and parking, coordinating in advance with the appropriate traffic control agencies to ensure the safety and well-being of the traveling public, and if required, developing a construction traffic and parking management plan that minimizes traffic interference and maintains traffic flow and safety, especially along Marsh Road and Nelson Road.
Visual Resources and Aesthetics (Including Lighting/Dark Skies)	GSA would incorporate design features to reduce light pollution and light trespass as reasonably achievable, including conducting construction during daylight hours whenever possible, pointing lights downward and not toward the sky, reducing sky glow, requiring shielding for any lighting used at night, using the minimum amount of lighting required for safety and security.
Solid Waste and Hazardous Materials	GSA would require frequent removal of solid and hazardous materials to minimize any potential runoff. GSA would require that hazardous materials would be properly stored. GSA would develop and implement a Spill Prevention, Control, and Countermeasure Plan.
Utilities	GSA would require location and marking of underground utilities prior to construction. GSA would coordinate all potential outages in advance with affected parties.
Recreation	GSA would communicate with the public and potentially impacted businesses regarding construction plans.
Wildlife and Habitat	GSA implementation of management and mitigation measures for water resources would also minimize or mitigate impacts on wildlife habitat. GSA would revegetate temporary disturbance areas using a regionally appropriate native seed mix to benefit wildlife habitat by restoring native vegetation and limiting the potential for the introduction and spread of invasive species. GSA would consult with the U.S. Fish and Wildlife Service, in accordance with Section 7 of the Endangered Species Act, to identify measures to avoid, minimize, or mitigate impacts. However, GSA would minimize effects to listed species as well as their habitat to the greatest extent practicable regardless of listing status. GSA would incorporate measures to avoid or minimize impacts to migratory birds, bald eagles, and Birds of Conservation Concern to the greatest extent practicable. If evidence of migratory bird nesting is observed during site preparation (e.g., birds are seen carrying nesting material), GSA would conduct brief surveys to confirm the presence or

Resource	Mitigation Measures and BMPs
Wildlife and Habitat contd.	absence of nests in the Proposed Project Area. GSA would implement other BMPs to protect nests from construction-related disturbance, including minimizing brush clearing and tree removal to the greatest extent practicable during nesting season and establishing an appropriate buffer around any active nests, if found.
Air Quality	Air quality impacts during construction would be minimized by implementing standard construction dust control BMPs. Emissions during the construction period would be temporary and are not anticipated to have a noticeable effect on air quality.
Noise	Project-specific noise-reduction BMPs would be implemented to decrease impacts. No nighttime work would occur. During construction, equipment furnished with noise control devices (e.g., mufflers) and the use of sound barriers would result in lower sound levels than discussed under the Proposed Action Alternative section. All applicable noise laws and guidelines would be followed to reduce effects from noise produced by construction.

Key: ASA = Archaeologically Sensitive Area; BMP = best management practice; contd. = continued; GSA = U.S. General Services Administration; LPOE = Land Port of Entry; SHPO = State Historic Preservation Office

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8.0 LIST OF AGENCIES, ORGANIZATIONS, AND PERSONS CONTACTED

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U.S. Fish and Wildlife Service

U.S. Environmental Protection Agency

Federal Emergency Management Agency

U.S. Army Corps of Engineers

Canadian Government/Agencies/Organizations

Canadian Transportation Agency

Transport Canada

Canada Border Services Agency

Public Services and Procurement Canada

Quebec Ministry of International Relations and La Francophonie

Quebec Ministry of Transport and Sustainable Mobility

Ministry of the Environment, Fight Against Climate Change, Wildlife and Parks

Regional County Municipality (MRC) Coaticook

City of Coaticook

Municipality of Dixville

Regional and State Agencies

Vermont Agency of Natural Resources

Vermont Agency of Transportation

Vermont State Historic Preservation Office

Vermont Department of Labor

Vermont Department of Environmental Conservation

Vermont Agency of Commerce and Community Development

Northeastern Vermont Development Association

Essex County Natural Resource Conservation District

Regional Organizations

North County Chamber of Commerce

Essex County Sheriff's Department

Essex North Supervisory Union 19
Northlands Job Corps Center
Northeast Kingdom Collaborative
Vermont Association of Snow Travelers
Northeast Kingdom Snow Blasters
Northeast Kingdom Broadband

Local Government/Agencies/Organizations

Town of Norton
Norton Town Hall
Beecher Falls Fire Department

Elected Officials

Patrick Leahy, Former U.S. Senator
Bernie Sanders, U.S. Senator
Peter Welch, U.S. Senator
Becca Balint, U.S. Representative
Phil Scott, Governor
David Zuckerman, Former Lieutenant Governor
Molly Gray, Former Lieutenant Governor
John Rodgers, Lieutenant Governor
Russ Ingalls, State Senator
Robert Starr, Former State Senator
Randy Brock, State Senator
Robert Norris, State Senator
Josie Leavitt, Former State Representative
Michael Morgan, State Representative
Leland Morgan, State Representative
Terri Lynn Williams, Former State Representative
Paul Lefebvre, Former State Representative