U.S. General Services Administration

FINAL ENVIRONMENTAL ASSESSMENT

Richford Land Port of Entry

Richford, Vermont

September 2025

Final
Environmental Assessment
Richford Land Port of Entry
Richford, Vermont

Prepared for:

U.S. General Services Administration – Region 1
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Boston, MA 02222-1076
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FOR
RICHFORD LAND PORT OF ENTRY
RICHFORD, VERMONT

Lead Agency: U.S. General Services Administration

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ACRONYMS AND ABBREVIATIONS

APE	Area of Potential Effects
ASA	Archaeologically Sensitive Area
AST	aboveground storage tank
ASTM	American Society of Testing and Materials
BMP	best management practice
CBP	U.S. Customs and Border Protection
CREC	controlled recognized environmental condition
CWA	Clean Water Act
DEC	Department of Environmental Conservation
EA	Environmental Assessment
EISA	Energy Independence and Security Act of 2007
ESA	Endangered Species Act
GSA	U.S. General Services Administration
Hartgen	Hartgen Archeological Associates, Inc.
HRI	Historic Resources Identification
HREC	historical recognized environmental condition
IIJA	Infrastructure Investment and Jobs Act of 2021
IPAC	Information for Planning and Consultation
JD	Jurisdictional Determination
LPOE	Land Port of Entry
NEPA	National Environmental Policy Act of 1969
NRHP	National Register of Historic Places
ORC	Online Resource Center
PBS	Public Buildings Service
PEM	Palustrine Emergent Persistent
PFO	Palustrine Forested
PSS	Palustrine Scrub-Shrub
REC	recognized environmental condition
SHPO	State Historic Preservation Office
SPCC	Spill Prevention, Control, and Countermeasure
USACE	U.S. Army Corps of Engineers

USDA NRCS	U.S. Department of Agriculture, Natural Resources Conservation Service
USFWS	U.S. Fish and Wildlife Service
VDHP	Vermont Division for Historic Preservation
VTrans	Vermont Agency of Transportation

EXECUTIVE SUMMARY

The U.S. General Services Administration (GSA) New England Region (Region 1) prepared this 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) located north of the town of Richford, Vermont (the Richford LPOE). GSA prepared this EA in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 United States Code 4321 et seq.) and the GSA Public Buildings Service NEPA Desk Guide (GSA 1999). This EA discloses the direct and indirect environmental impacts that would result from the actions associated with the proposed expansion and modernization of the Richford LPOE, including site acquisition, demolition, disposal, and construction.

Purpose and Need for the Proposed Action

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

The Proposed Action is needed to bring the Richford LPOE facility into compliance with federal infrastructure and security requirements and support the mission and needs of U.S. Customs and Border Protection (CBP). The existing facility does not meet the operational needs of CBP due to its space constraints and limitations associated with its aging infrastructure.

Description of the Proposed Action and Alternatives

Under the Proposed Action, GSA would modernize and expand the Richford LPOE to meet CBP operational requirements. The Proposed Action would bring the LPOE into compliance with current federal infrastructure and security requirements and improve traffic flow, increase the efficiency of inspections of commercial and non-commercial traffic, and enhance safety and security.

The EA analyzes two alternatives, the Proposed Action Alternative and the No Action Alternative, which are described in detail in Section 2 of this EA. The Proposed Action Alternative described in this EA is considered preliminary. However, all elements of the final design would fit within the area evaluated in this EA, as described in Section 3.1. GSA and CBP would finalize the layout of the modernized LPOE upon completion of the NEPA process. Under the No Action Alternative, GSA would not construct a new Richford LPOE facility and the existing facility would continue to operate in its current condition.

Public Engagement

GSA conducted a 30-day public scoping period from September 6, 2024, to October 5, 2024, and held a public scoping meeting on September 10, 2024. GSA announced the public scoping period and meeting in the *Burlington Free Press*, *Newport Dispatch*, and *Saint Albans Messenger*

newspapers, coordinated with the Richford Town Clerk's office to distribute information about the public scoping period and meeting, and sent notification letters to stakeholders and interested parties by mail and email. The public scoping meeting was held at the Town Hall in Richford, Vermont. Stakeholders could attend the meeting in person or attend virtually via the Zoom online platform. Twelve individuals attended the meeting and eight stakeholders submitted 18 individual comments covering various themes related to the Proposed Action during the public scoping period.

The Draft EA was made available for a 30-day public review period from June 30, 2025, through July 29, 2025, and GSA held a Draft EA public meeting on Tuesday, July 15, 2025. GSA announced the Draft EA public comment period and meeting in the *Burlington Free Press*, *Newport Dispatch*, and *Saint Albans Messenger* newspapers and sent notification letters to stakeholders and interested parties by mail and email. The Draft EA meeting was held at the Town Hall in Richford, Vermont. Stakeholders could attend the meeting in person or attend virtually via the Zoom online platform. Six individuals attended the meeting, and five stakeholders submitted seven individual comments during the Draft EA public review period.

Environmental Impacts

Table ES-1 presents a summary of the potential environmental impacts associated with the Proposed Action Alternative and the No Action Alternative for the resources analyzed in this EA. Table ES-1 also identifies the proposed mitigation measures and best management practices (BMPs) that GSA would implement to minimize or mitigate potential adverse effects.

Table ES-1. Summary of Potential Impacts

Resource	No Action Alternative	Proposed Action Alternative	Mitigation Measures and Best Management Practices
Land Use and Zoning	No impacts	Direct, temporary and permanent, minor, site-specific and local, adverse impacts as a result of construction, maintenance easements, and property acquisition.	The U.S. General Services Administration (GSA) would coordinate with landowners to maintain access to their properties during and after construction. 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 in accordance with the policies and provisions in the Uniform Act, as needed.
Geology and Soils	No impacts	Direct and indirect, permanent, moderate, site-specific adverse impacts on soils as a result of excavation, grading, clearing, and increasing the impervious surface area. There would be no impact on geology.	GSA would implement best management practices (BMPs) to minimize erosion and sedimentation, including temporary seeding, use of silt fencing and sediment traps, installing gravel construction entrances/exits, and other methods as determined during detailed design. GSA would revegetate areas temporarily cleared of vegetation with regionally appropriate native plant species.

Resource	No Action Alternative	Proposed Action Alternative	Mitigation Measures and Best Management Practices
Water Resources	No impacts	Direct and indirect, temporary to short-term, minor to moderate, site-specific and local adverse impacts on surface water resources, including wetlands and streams, from construction of the Land Port of Entry (LPOE) and operation of construction equipment. Permanent, direct, moderate, site-specific, adverse impacts to wetlands as a result of the permanent removal of up to 1 acre of wetlands. Direct and indirect, temporary to permanent, moderate, site-specific adverse impacts to approximately 236 linear feet of streams as a result of construction activities and increases in impervious cover.	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. GSA would obtain the required permits and would comply with the associated permit requirements. 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 Vermont Department of Environmental Conservation. GSA would implement a Spill Prevention, Control, and Countermeasure Plan to minimize the potential for adverse effects to groundwater.

Resource	No Action Alternative	Proposed Action Alternative	Mitigation Measures and Best Management Practices
Wildlife and Habitat	No impacts	Permanent, direct, adverse impacts as a result of the permanent loss of 3.5 acres of habitat and the increase in impervious surfaces that would result in higher volumes of stormwater runoff. Direct, short-term, minor, local adverse impacts to the monarch butterfly as a result of modifying habitat adjacent to roadways and developed areas. Direct, temporary, minor, site-specific to local, adverse impacts during construction due to the noise, the presence of construction equipment and crews, and potential increases in water turbidity and pollution. There would be no impacts to threatened or endangered species because none occur in the proposed project area.	The management and mitigation measures that GSA would implement 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 or spread of invasive species. If the monarch butterfly, or any other new species that has the potential to occur in the action area, becomes listed under the Endangered Species Act (ESA) prior to implementation, GSA would consult with the U.S. Fish and Wildlife Service, in accordance with Section 7 of the ESA, to identify measures to avoid, minimize, or mitigate impacts. However, GSA would minimize effects to monarch butterfly 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 absence of nests in the proposed project area. GSA would implement other BMPs such as 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, to protect nests from construction-related disturbance.

Resource	No Action Alternative	Proposed Action Alternative	Mitigation Measures and Best Management Practices
Cultural Resources	No impacts	Direct, permanent, major, site-specific, adverse and beneficial impacts would occur if cultural resources were discovered during ground-disturbing activities. Adverse effects would occur in the unlikely event that cultural resources were damaged during discovery, and beneficial effects would occur if cultural resources were discovered and preserved. Direct, permanent, major, site-specific, adverse impacts to historic resources due to the proposed demolition of the historic LPOE building.	GSA has initiated Section 106 consultation with the Vermont State Historic Preservation Office (SHPO). 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.
Socioeconomics	No impacts	Indirect, temporary, minor, local adverse and beneficial impacts to local employment and income through potential revenue loss during closure of the Richford LPOE for construction and through increases in temporary employment during construction. Direct, permanent, moderate, site-specific, and adverse effects to private property owners whose properties would be acquired for, and impacted by, construction of the modernized LPOE. Indirect, permanent, minor, local, beneficial impacts to socioeconomics would occur due to improved efficiency and reduced wait times at the modernized LPOE.	The measures that GSA would implement for Land Use would also mitigate impacts to socioeconomics.

Resource	No Action Alternative	Proposed Action Alternative	Mitigation Measures and Best Management Practices
Traffic, Transportation and Parking	No impacts	Direct, temporary, minor, regional, adverse impacts would occur as a result of the LPOE closure during construction. Direct, permanent, minor, site-specific and local beneficial impacts would occur as a result of improved traffic flow and parking expansion.	GSA would provide alternate routes by implementing traffic detours, using traffic management personnel, posting detour signage, and coordinating with local authorities for effective traffic flow management. Non-commercial traffic would be rerouted to the Pinnacle LPOE (3.3 miles west of the Richford LPOE) or the East Richford LPOE (7 miles east of the Richford LPOE). Commercial traffic would be rerouted to use the West Berkshire LPOE (11 miles west of the Richford LPOE).
Aesthetics (including Dark Skies)	No impacts	Direct, permanent, negligible to moderate, site-specific beneficial or adverse impacts on aesthetics would occur from altering the existing landscape by replacing the existing facility with a larger, modernized facility. Whether the impact is adverse or beneficial would depend on individual preferences. No noticeable effect on dark skies.	GSA would incorporate design features to reduce light pollution and light trespass as reasonably achievable.
Solid Waste and Hazardous Materials	No impacts	Direct and indirect, temporary to long-term, negligible to minor, site-specific, adverse effects from accidental spills of hazardous materials, such as from construction vehicles, during the removal of existing fuel storage tanks, or due to the use of paints and cleaners in facility maintenance activities.	GSA would require frequent removal of solid and hazardous materials to minimize any potential runoff. GSA would require that hazardous materials be properly stored. GSA would develop and implement a Spill Prevention, Control, and Countermeasure Plan.
Utilities	No impacts	Direct, temporary, minor, local adverse impacts during construction due to potential temporary outages for adjacent property owners. Direct, permanent, moderate, site-specific, beneficial impacts to utilities due to the sustainable design, upgraded interior utilities, replacement of aging infrastructure, and improved efficiency and reliability.	GSA would require underground utilities be located and marked prior to construction. GSA would coordinate all potential outages in advance with affected parties.

Resource	No Action Alternative	Proposed Action Alternative	Mitigation Measures and Best Management Practices
Recreation	No impacts	Direct and indirect, temporary, moderate, regional adverse impacts would occur as a result of LPOE closure during construction due to detours and increased wait times for people crossing the border to recreate, along with reroutes for cyclists crossing the border. Direct and indirect, permanent, minor, regional beneficial impacts because of increased inspection efficiency and improved traffic flow for people crossing the border to recreate.	The marked detour routes that GSA would implement for Traffic, Transportation, and Parking would apply to recreational users, directing them to the next nearest LPOE.

1.0 INTRODUCTION

The U.S. General Services Administration (GSA) New England Region (Region 1) prepared this 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) located north of the town of Richford, Vermont (the Richford LPOE). Expansion and modernization of the Richford LPOE is needed to improve traffic flow, enhance security, and bring the facility into compliance with current federal facility standards for LPOEs. This EA discloses the direct and indirect environmental impacts that would result from the actions associated with the proposed expansion and modernization of the Richford LPOE, including site acquisition, demolition, disposal, and construction.

This EA has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 United States Code 4321 et seq.) and GSA's Public Building Services NEPA Desk Guide (GSA 1999).

1.1 Purpose and Need for Proposed Action

As part of a nationwide effort, GSA conducted programmatic feasibility studies for LPOEs and their operational deficiencies based on the most recent LPOE design standard. U.S. Customs and Border Protection (CBP), the primary tenant at LPOEs, participated in this effort. The Infrastructure Investment and Jobs Act of 2021 (IIJA) allocated $3.4 billion to GSA to undertake 26 major expansion and modernization projects along the northern and southern U.S. borders (GSA 2025a). Many of the country's LPOEs are outdated, long overdue for modernization, operate at full capacity, and have surpassed the needs for which they were originally designed, including the Richford LPOE.

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

The Proposed Action is needed to bring the Richford LPOE facility into compliance with federal infrastructure and security requirements and support the mission of U.S. Customs and Border Protection (CBP). The existing facility does not meet the operational needs of CBP 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 a majority of the country's 167 LPOEs. GSA Public Buildings Service (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 Standard. The feasibility studies provided alternatives to modernize and expand each LPOE, correct deficiencies, and bring them up to the current standard. The feasibility study for the Richford LPOE, conducted in 2019, identified deficiencies at the Richford 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 a variety of 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 EA. The Proposed Action Alternative described in this EA is considered preliminary. However, all elements of the final design would fit within the area evaluated in this EA, as described in Section 3.1. GSA and CBP would finalize the layout of the modernized LPOE upon completion of the NEPA process.

1.3 Existing Facilities

The existing Richford LPOE consists of a single building located on a 1.27-acre property approximately 420 feet south of the international border between the United States and Canada and connects the towns of Richford, Vermont, and Abercorn, Quebec. The LPOE is located at 705 Province Street (Vermont Route 139) (Figures 1 and 2). The LPOE processes vehicular traffic and is operational 24 hours a day, 365 days a year. Construction of the Richford LPOE was completed in 1932, and renovations have been made to the LPOE since then, including replacement of the original porte cochere in 1972 and updates to the building's windows, garage doors, and siding. The Proposed Action aims to modernize the Richford LPOE to bring the facility into compliance with current federal facility standards for LPOEs.

The LPOE property is bounded on the north by the U.S.-Canada border; on the west by forests and open fields, as well as Canadian Pacific Railway tracks; and on the east and south by privately owned parcels. The surrounding area is sparsely populated, with the nearest commercial facilities being in the town of Richford, a short distance south of the LPOE. Further information regarding land use within the surrounding area can be found in Section 3.2.

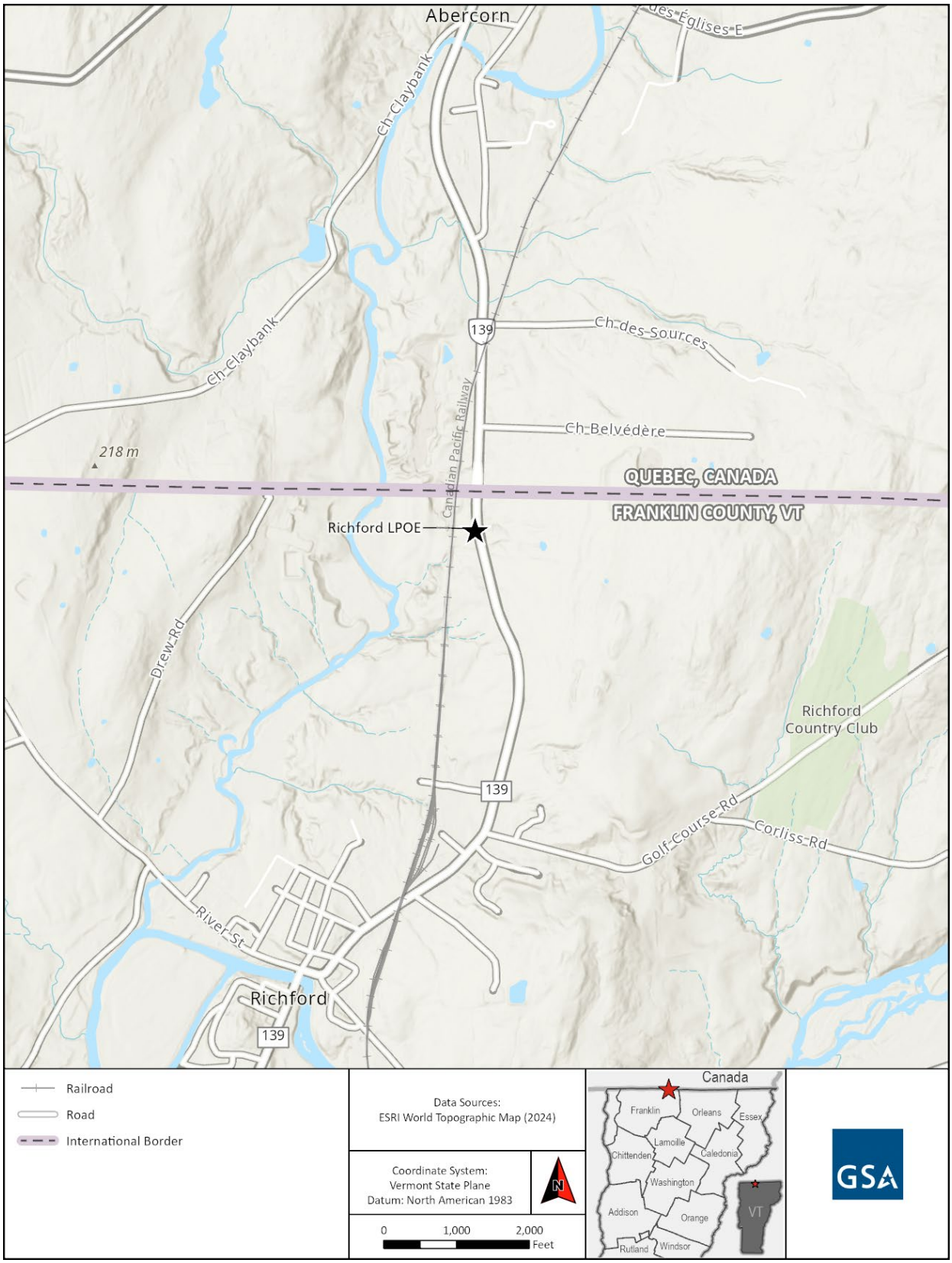

Figure 1. Project Area Vicinity

Figure 2. Existing Richford LPOE

Structural deficiencies are a key reason behind opting for demolition over renovation, as the existing building has exhibited deterioration over the course of the LPOE's operation. This has compromised the performance and integrity of the building, with visible issues such as cracking and corrosion. Furthermore, the building does not sufficiently comply with current structural and accessibility standards. In addition to physical shortcomings, the building lacks sustainable design features and is equipped with outdated mechanical systems that result in excessive energy consumption and high operational costs. These deficiencies collectively make demolition and new construction a more viable, long-term solution.

1.4 Public Engagement

1.4.1 Public Scoping

GSA conducted a 30-day public scoping period from September 6, 2024, to October 5, 2024. GSA announced the public scoping period via a notice published in the *Burlington Free Press*, *Newport Dispatch*, and *Saint Albans Messenger* newspapers. GSA also coordinated with the Richford Town Clerk's office to distribute information about the public scoping period and sent notification letters to stakeholders and interested parties by mail and email. The newspaper publications, stakeholder letters, and emails also notified stakeholders of a public scoping meeting being held to provide the opportunity for local communities, government agencies, special interest groups, and the general public to learn about and to express their thoughts regarding the Proposed Action.

A public scoping meeting was held on Tuesday, September 10, 2024, at the Town Hall in Richford, Vermont. Stakeholders could attend the meeting in person or attend virtually via the Zoom online platform. The meeting was attended by 12 individuals (six in-person and six virtual) representing a variety of stakeholder and interest groups, including local citizens and landowners, members of the business community, regional agencies, state agencies, Canadian government agencies, and other organizations. GSA staff gave a presentation on the project background, goals, and plans for community engagement and communication. The presentation also covered the NEPA process and described analysis and compliance efforts for resources such as wetlands, wildlife, and historic resources.

Eight stakeholders submitted 18 individual comments covering various themes related to the Proposed Action during the public scoping period. Comments received during the public scoping period, including during the public scoping meeting on September 10, 2024, are summarized as follows:

- The Northwest Regional Planning Commission noted that the EA should consider bicycle traffic and connectivity coming from Canada.

- Some commenters asked about construction closures. One business owner expressed concern over lack of access to their property during key operational periods during construction closures.
- The Vermont Division for Historic Preservation (VDHP) noted that they seek to continue consultation as plans become more defined in an effort to reduce the adverse impacts to the border crossing.
- Nearby landowners expressed concern over impacts the Proposed Action may have on their properties. One landowner expressed concern over the potential for changes to the LPOE to result in bright lights shining onto their property at night. Other commenters asked that GSA work to minimize impacts to their properties, expressing concerns about vegetation changes, increased traffic, road alignment changes, and privacy.
- One commenter noted concerns over traffic safety at the field entrance near the railroad tracks and emphasized the importance of clear visibility at this crossing.
- Landowners and local citizens asked about the design and location of the LPOE under the Proposed Action. Some commenters requested that the LPOE be moved more north, closer to the Canadian border, while others indicated a preference for a more southern location. Other commenters asked how large the modernized LPOE would be, compared to its current footprint. One commenter noted the importance of a clear line of sight to and from the LPOE.
- The Vermont Agency of Natural Resources noted that any impacts to jurisdictional wetlands or their buffers require a permit from the Wetland Program, with field verification of the wetland delineations prior to application, and provided additional information for compliance coordination.

Additional information about public scoping can be found in the Public Scoping Summary Report (Appendix B).

1.4.2 Draft EA Review

The Draft EA was made available for a 30-day public review period from June 30, 2025, through July 29, 2025. An electronic copy of the Draft EA was published on the GSA website.[1] A paper copy of the Draft EA was available during the public review period at the Arvin A. Brown Public Library located at 88 Main Street in Richford, Vermont. A Notice of Availability for the Draft EA announcing the availability of the document and the opening of the 30-day comment period was published in the *Burlington Free Press*, *Newport Dispatch*, and *Saint Albans Messenger*

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

newspapers. GSA also sent notification letters to stakeholders and interested parties by mail and email.

The Notice of Availability and stakeholder letters also announced a Draft EA public meeting. The meeting was held on Tuesday, July 15, 2025, at the Town Hall in Richford, Vermont. Stakeholders could attend the meeting in person or attend virtually via the Zoom online platform. Six individuals attended the meeting (two in-person and four virtual). A video recording of the meeting was posted on the GSA website. Five stakeholders submitted seven individual comments during the Draft EA public review period.

Documentation related to the Draft EA public review period, including newspaper notices, stakeholder notification letters, public meeting materials, and a full transcript of the public meeting, is provided in Appendix C. Comments on the Draft EA and GSA responses are also provided in Appendix C.

1.5 Compliance with Relevant Environmental Laws and Regulations

1.5.1 National Environmental Policy Act of 1969

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 United States Code 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. GSA's EAs and other NEPA documents are prepared in accordance with the GSA PBS NEPA Desk Guide (GSA 1999).

1.5.2 National Historic Preservation Act of 1966

The potential effects of the project alternatives on historic resources are evaluated in Section 3.6 of this EA, as required by NEPA. GSA must also identify and assess the effects its actions may have on cultural resources in accordance with Section 106 of the National Historic Preservation Act. These evaluations can be integrated under the NEPA analysis or completed separately. For this project, GSA has elected to perform these evaluations separately.

GSA has initiated Section 106 consultation with the Vermont State Historic Preservation Office (SHPO), as set forth in 36 Code of Federal Regulations 800.3. Through the Section 106 consultation process, GSA will identify impacts on cultural resources and, if necessary, negotiate measures to avoid, minimize, or mitigate adverse effects.

1.5.3 Tribal Consultation

Implementing regulations for Section 106 of the National Historic Preservation Act (36 Code of Federal Regulations part 800) require 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.

1.5.4 Clean Water Act

Section 404 of the Clean Water Act (CWA) regulates the discharge of dredged or fill material into waters of the United States, including wetlands and streams. Proposed activities are regulated through a regulatory review process and are allowed if an applicable Section 404 Permit, Section 401 Water Quality Certification, or Article 24 Freshwater Wetlands Permit is issued. 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 (JDs) to determine or confirm the presence of wetlands and streams. Because the Proposed Action has the potential to affect wetlands and streams, GSA must consult with USACE and the Vermont Department of Environmental Conservation (DEC). GSA has been in contact with USACE and Vermont DEC and conducted a site visit with representatives from both agencies to verify delineated wetland boundaries on April 16, 2024. GSA submitted a request for a preliminary JD to the USACE New England District on May 8, 2024, and USACE issued a preliminary JD on July 23, 2024. Vermont DEC provided its determination of state wetland jurisdiction and classifications via email on July 19, 2024, and provided a completed Wetland Classification Form to document its determination on December 3, 2024.

Compensatory mitigation is required under CWA Section 404 to offset any unavoidable adverse impacts that remain after all appropriate and practicable avoidance and minimization have 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.

Section 401 of the CWA requires state water quality certification or waiver for any federally permitted action involving discharges into waters of the United States 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.

Agency correspondence related to Section 401 and 404 consultations can be found in Appendix A.

1.5.5 Endangered Species Act Section 7 Consultation

Section 7 of the Endangered Species Act (ESA) requires federal agencies to consult with the U.S. Fish and Wildlife Service (USFWS) when any project or action they authorize, fund, or carry out may affect species listed as threatened or endangered under the ESA or their designated critical habitat. An official species list, issued by the USFWS New England Ecological Services Field Office, was obtained through the USFWS Information for Planning and Consultation (IPAC) system on August 13, 2024, and was most recently updated on September 9, 2025 (Appendix A). The official species list indicated that the only species of concern potentially occurring in the proposed project area is the monarch butterfly (*Danaus plexippus*). The USFWS has proposed the monarch butterfly for listing under the ESA (89 Federal Register 100662), but it is not currently listed. Therefore, no federally listed species occur in the proposed project area. Official species lists remain valid for 90 days.

Because no federally listed species occur in the proposed project area, GSA has determined that the Proposed Action would have no effect on federally listed species. No further consultation is required under Section 7 of the ESA at this time. However, if the Proposed Action is selected for implementation and the monarch butterfly or any other new species that have the potential to occur in the proposed project area become listed under the ESA prior to implementation, GSA would reinitiate consultation with USFWS in accordance with Section 7 of the ESA.

1.6 Other Agency Consultation

The Proposed Action would disturb more than 5,000 square feet of land and would therefore need to meet the requirements of Section 438 of the Energy Independence and Security Act of 2007 (EISA). Under Section 438, federal agencies are required to reduce stormwater runoff from federal development and redevelopment projects to protect water resources and to restore the redevelopment hydrology to the maximum extent possible regarding temperature, rate, volume, and duration of flow. GSA would use various stormwater management systems to meet the EISA requirements. Additional information about stormwater management under the Proposed Action can be found in Section 3.4, Water Resources.

Because the Proposed Action would permanently convert soils designated as prime farmland and farmland of statewide importance, GSA is required to consult with the U.S. Department of Agriculture, Natural Resources Conservation Service (USDA NRCS) in accordance with the Farmland Protection Policy Act. GSA completed consultation with USDA NRCS on January 16, 2025 (Appendix A).

1.6.1 Other Relevant Laws and Regulations

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

Table 1. Relevant Laws and Regulations

Statutes
Archaeological Resources Protection Act of 1979 (16 United States Code [U.S.C.] § 470aa-mm)
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. § 8231, 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. § 300, et seq.)
Inflation Reduction Act of 2022 (Public Law 117-369, 136 Statute 1818)
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
Executive Orders
EO 11593 – Protection and Enhancement of the Cultural Environment
EO 11988 – Floodplain Management
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 13690 – Establishing a Federal Flood Risk Management Standard and a Process for Further Soliciting and Considering Stakeholder Input
Other Guidance
Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 Federal Register 44716)

2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

This EA analyzes the potential impacts of two alternatives: the No Action Alternative and the Proposed Action Alternative. An overview of the Proposed Action Alternative is provided below. The illustrated Proposed Action Alternative depicted in Figure 3 is considered preliminary. However, all elements of the final design would fit within the area evaluated in this EA, as described in Section 3.1. GSA and CBP would finalize the layout of the modernized LPOE upon completion of the NEPA process.

2.1 Description of the Proposed Action

The proposed project area for the proposed modernized Richford LPOE includes the existing 1.27-acre LPOE property, parts of the surrounding properties, and portions of Vermont Route 139 directly abutting and near the property (Figure 3). The Proposed Action involves demolishing the existing LPOE building and replacing it with a newly constructed facility designed to meet updated operational and capacity requirements. The Proposed Action would help improve traffic flow, enhance security, and increase officer safety and efficiency of inspections. The proposed area of work would encompass the location of the existing Richford LPOE property, portions of the surrounding properties, and the Vermont Route 139 right-of-way.

Under the Proposed Action Alternative, GSA would acquire approximately 6.7 acres of private property and design and construct a new LPOE facility. GSA would acquire portions of privately owned land from two different landowners along Vermont Route 139, along with a portion of Vermont Route 139, and cause the displacement of a residential tenant from the house south of the existing LPOE. GSA would reestablish driveways of both landowners south of the new LPOE facility. One landowner is Pleasant Valley Farms, which manages active farmland, a gravel pit, a maple sugaring operation, and a rental residence. The other landowner is an owner-occupied residence. The optimal location and elevation of the new LPOE would require demolition of the existing historic LPOE building. Additionally, GSA would demolish the house located south of the existing LPOE and construct new roads to allow private landowners to continue to access their properties.

The exterior of the new LPOE facility would include two standard inbound lanes, one oversized inbound lane, one outbound lane, primary and secondary inspection canopies, mechanical gates and guardrails, and additional visitor and employee parking. The interior would feature garages with enclosed inspection bays, a new office work area, secure hold and inspection areas, and upgraded utilities. The new facility would also include on-site septic, stormwater retention, and snow storage areas. The new LPOE building would face the U.S.–Canada border, with its central location providing optimal surveillance of the border and inbound and outbound traffic.

Figure 3. Proposed Action Alternative

Inbound traffic entering the United States would stop for primary inspection utilizing one of the inbound traffic lanes before either being cleared for entry into the United States and resuming travel on Vermont Route 139 or being directed to the secondary inspection area. Once the soft or hard secondary inspection is complete, the traveler would either proceed south on Vermont Route 139, entering the United States, or be denied entry, returning to Canada utilizing the outbound lane, which would loop around the new LPOE building. Outbound traffic approaching the LPOE via Vermont Route 139 would utilize the one available outbound lane for primary inspection. Secondary inspection parking spaces would be provided beyond the new inspection booth. If cleared, travelers would continue into Canada via the outbound lane.

The new LPOE would conform to the GSA PBS Interim Core Building Standards, which were issued on February 24, 2025, following the recission of the GSA PBS P100 Facilities Standards. The PBS Interim Core Building Standards provide a list of mandatory laws, regulations, and codes for projects under design and construction (GSA 2025b).

During construction, the Richford LPOE would close for approximately 24 months, and commercial traffic would be diverted to the West Berkshire LPOE (approximately 11 miles west). Non-commercial traffic would utilize the Pinnacle LPOE (approximately 3 miles west) or the East Richford LPOE (approximately 7 miles east).

2.2 No Action Alternative

The No Action Alternative represents no change from current management; the analysis of the No Action Alternative provides a baseline against which the Proposed Action Alternative and other alternatives are compared. Under the No Action Alternative, GSA would not expand or modernize the Richford LPOE facility. The existing facility would continue to operate in its current condition, which does not comply with current federal infrastructure and security requirements. Therefore, the No Action Alternative would not meet the project purpose and need as described in Section 1.3. However, the potential effects of the No Action Alternative are evaluated as required under NEPA.

2.3 Alternatives Considered but Dismissed from Detailed Analysis

Throughout the project planning process, several alternatives that met the project purpose and need were considered and evaluated. Preliminary concepts were developed in late 2023 and early 2024 to address operational deficiencies at the existing LPOE and meet future CBP needs in alignment with the CBP LPOE Design Standard. GSA refined the preliminary 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 schemes, including two options that were dismissed from detailed analysis. The dismissed schemes and the rationale for their dismissal are described below.

2.3.1 Scheme 1

Scheme 1 included the exterior restoration and interior rehabilitation of the existing LPOE building and construction of a new primary inspection canopy, freestanding inspection booths, and a new two-story LPOE building south of the existing LPOE building. The interior of the new two-story building would have included three inspection bays, garages, a health and fitness area, offices, and holding facilities. The exterior would have provided two inbound lanes, two outbound lanes associated with the existing building and a secondary inspection canopy containing six booths, and visitor parking associated with the new building. The existing canopy would have been rebuilt to a smaller footprint to allow for a new canopy over the expanded Vermont Route 139 roadway with the required 18-foot clearance. Site improvements would have included new access roads west and east of the buildings, three-phase electrical service, and a new septic system. An overview of Scheme 1 is shown in Figure 4.

Scheme 1 would not meet CBP's operational goals or the requirements of the CBP LPOE Design Standard. The existing LPOE building has significant structural deficiencies that would require extensive repairs, and the existing garage floor slabs would need substantial enhancement to carry storage loads and function as storage space, the only appropriate program for those garage spaces. In addition, the existing LPOE building obscures views of the border from staff-occupied spaces, thereby creating security issues. Scheme 1 would have had the largest impact on adjacent landowners and wetlands of the preliminary alternatives considered, as the design would cover approximately 5.2 acres and would require substantial site grading. Therefore, Scheme 1 was dismissed from further consideration.

2.3.2 Scheme 2

Scheme 2 would have included the demolition of the existing LPOE building and construction of a new two-story LPOE building. Additionally, Scheme 2 would have involved the demolition of a house located on the parcel south of the existing LPOE and west of Vermont Route 139 to support LPOE expansion and provide new access roads to the property located west of the rail line. The interior of the new building would have included two new inspection bays, a garage, a health and fitness area, and holding facilities. The exterior would have included two inbound lanes, two outbound lanes, a secondary inspection canopy with three booths, and visitor parking and employee parking, with a total area of approximately 3.4 acres. An overview of Scheme 2 is shown in Figure 5.

The proposed location of the new LPOE building under Scheme 2 would not provide optimal surveillance of the border from staff-occupied spaces and the design would not allow for an attached primary inspection booth. In addition, grade changes to the west of the site would require an inefficient walk-out basement with limited opportunity for surveillance of the west side of the site. Significant retaining walls would be needed to navigate the grade changes. Therefore, Scheme 2 was dismissed from further consideration.

Figure 4. Scheme 1

Figure 5. Scheme 2

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This section describes the existing environment that may be affected by implementing the Proposed Action and serves as a baseline from which to identify and evaluate potential impacts. The description of the affected environment focuses on those resource areas that are potentially subject to impacts resulting from the Proposed Action.

3.1 Methodologies

3.1.1 Affected Environment Methodology

The affected environment summarizes the current physical, biological, social, and economic environments of the area that would be affected by the Proposed Action. The affected environment is described for each resource area but generally includes three parcels surrounding the Richford LPOE that would be directly or indirectly affected by the Proposed Action. This area, referred to as the NEPA study area, encompasses a broad geographic region that includes not only the location of the Proposed Action but also surrounding areas that could be indirectly affected by its implementation. This larger area is evaluated to fully understand the potential environmental, social, and economic impacts of the Proposed Action. However, the affected environment for some resources extends beyond the NEPA study area. For example, the geographic area of analysis for potential socioeconomic effects extends beyond the NEPA study area to encompass town- or regional-level analysis, while the affected environment for other resources, such as geology and soils and cultural resources, is generally contained within the NEPA study area. Within this study area is the proposed project area, which is more narrowly defined and refers specifically to the locations where direct alterations—such as construction, land disturbance, or infrastructure changes—would occur if the Proposed Action Alternative is carried forward.

3.1.2 Environmental Consequences Methodology

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

Types of Impacts

The terms “impacts” and “effects” are used interchangeably in this document. For the sake of this document, direct and indirect effects are defined as follows:

- **Direct effects –** Effects which are caused by the action and occur at the same time and place. In other words, direct effects are those that are caused directly and immediately by project-related activities, such as excavation of land during construction that would remove vegetation and expose soils. Most direct effects would be confined to the NEPA study area (e.g., soil disturbance), but some may extend beyond the property boundary (e.g., traffic).

- **Indirect effects –** Effects which are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable. Indirect effects may include induced changes in land use patterns or populations or effects on air quality, water resources, or other natural systems that are delayed or occur outside of the immediate NEPA study area.

Effects resulting from a proposed action can be either adverse or beneficial. Adverse effects have a negative impact on a resource, while beneficial effects have a positive impact.

Impact Intensity Thresholds

Potential impacts are described in terms of effect, duration, intensity, geographic context, and type, as applicable. Definitions for intensity thresholds for the resources analyzed in this chapter are provided in Table 2. Proposed management and mitigation measures that GSA would take to avoid, minimize, or mitigate potential adverse effects of the Proposed Action are presented in Section 5.

Impact intensity thresholds were defined as a means of describing the size of the impact and its significance. The significance of impacts was determined systematically by assessing the duration (how lasting the change is), magnitude (amount of change), and extent (how widespread the change is) of an impact. Table 2 summarizes these thresholds, which are further defined for each resource within their respective sections.

Table 2. 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 would 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 would 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 discernable 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 Richford Land Port of Entry and the National Environmental Policy Act of 1969 (NEPA) study area.
Local	Impacts extend beyond the NEPA study area, affecting the town of Richford and areas in the vicinity of the NEPA study area.
Regional	Impacts affect a larger area such as Franklin County and other nearby communities.

3.2 Land Use and Zoning

This section assesses the potential for existing land use patterns and development trends within the proposed project area to affect or be affected by the implementation of the Proposed Action. The Proposed Action would take place on parcels that include the existing LPOE and private property located east and south of the LPOE (Figure 6).

3.2.1 Affected Environment

The Richford LPOE is situated in a rural area with a diverse landscape that includes residential use, agricultural lands, and natural areas. Much of the area around the Richford LPOE is devoted to farming, including both crop and livestock operations, and maple sugar production. The town of Richford itself is a small community with a mix of residential properties. The residential areas near the LPOE are low-density, with single-family homes and small developments. Surrounding the LPOE, the land also consists of forests, natural landscapes, and mountainous terrain.

The NEPA study area covers 13.4 acres and includes portions of two privately owned parcels and the existing LPOE parcel (Figure 6). The Town of Richford zoning map indicates that the entirety of the NEPA study area consists of parcels zoned as Rural Residential, as shown in Figure 6 (Town of Richford 2024a). There are residences within and to the east and south of the study area. The majority of the parcels to the east consist of natural landscapes, including forests rich in native tree species, wetlands, and streams. A maple sugaring operation is also located to the east, and the collection facility is located along Vermont Route 139, immediately opposite of the existing LPOE. A railroad track is located immediately west of the NEPA study area. Parcels west of the NEPA study area are zoned as agricultural and are actively used for agriculture.

The area of disturbance under the Proposed Action Alternative would be approximately 4.4 acres encompassing the locations of the existing Richford LPOE property, portions of surrounding properties, and the Vermont Route 139 right-of-way (Figure 6).

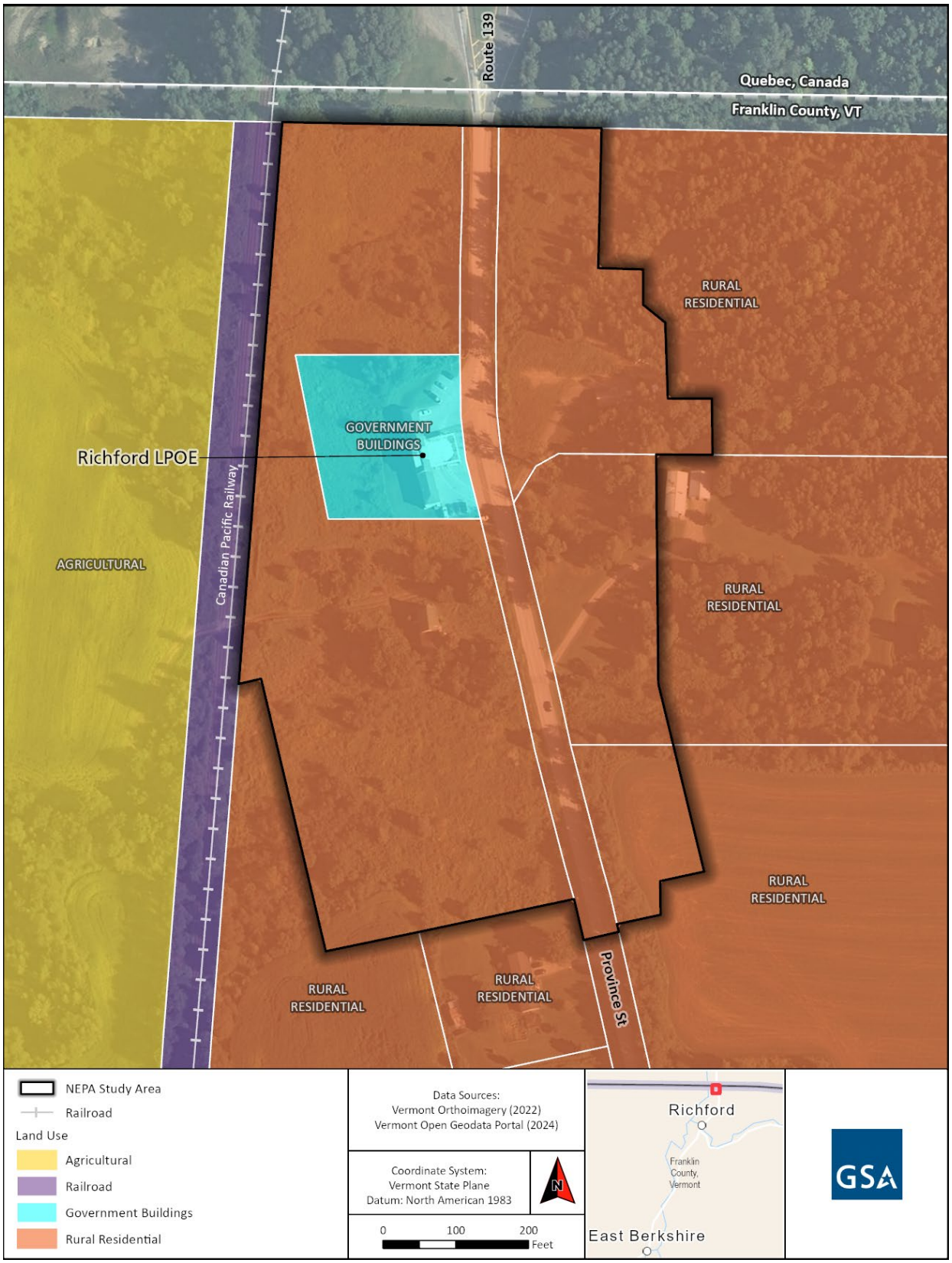

Figure 6. Land Use within the NEPA Study Area

3.2.2 Environmental Consequences

Proposed Action Alternative

Under the Proposed Action Alternative, GSA would acquire approximately 6.7 acres of privately owned land from two different landowners along Vermont Route 139, along with a portion of Vermont Route 139, for the construction of the new buildings and paved surfaces. The portions of the tax parcels acquired for the Proposed Action would be merged with the existing LPOE parcel as being identified as "Government Buildings." Once the land is developed and merged with the LPOE parcel, the change would be ongoing for the life of the facility. The remainder of the tax parcels would continue to be identified as Rural Residential. GSA would also require temporary easements across private property for use during construction. In addition to the small footprint of the project and its presence in a sparsely populated area, the Town of Richford would continue to identify the LPOE parcel as "Government Buildings," and uses and construction within these areas would be compatible with its zoning designation. Therefore, effects would be minor. Effects would be confined to the immediate area of the acquisition; however, the project may require planning at the local level and coordination with the Town of Richford's zoning and land use plans. Therefore, the Proposed Action would result in direct, temporary and permanent, minor, site-specific and local, adverse effects. After construction, the modernized and expanded Richford LPOE would continue to operate consistently with its current use.

No Action Alternative

A new Richford LPOE facility would not be constructed under the No Action Alternative. Routine repairs and maintenance of the existing facility would be conducted, and the LPOE would operate under the existing conditions. There would be no change in land use within the NEPA study area, and no impacts would occur.

3.3 Geology and Soils

This section describes effects of the Proposed Action on geology and soils in the proposed project area. Geology is the scientific study of the Earth, its composition, structure, processes, and history. Soil is a collective term for the inorganic and organic substrate covering bedrock, which supports vegetation growth and cover, in turn providing habitat and food for living organisms (USDA NRCS 2025). Geology and soil are interrelated as the type of bedrock and parent material in a region influences soil formation. The geologic processes that break down rocks, such as weathering and erosion, provide the mineral content for soils, while the landscape and climate shaped by geological forces affect how soil develops, tying soil properties directly to underlying geology in the area (AHDB 2025).

3.3.1 Affected Environment

The area of analysis for geology and soils is the NEPA study area, covering approximately 13.4 acres. Of the 13.4 acres, 1.1 acres is impervious cover, containing the footprint of the LPOE building, roadways, parking areas, and other residential structures. The 12.3 acres of pervious cover contain undisturbed forested and grass-covered land. Soils within the 1.1 acres of impervious cover have been previously affected by development associated with the existing LPOE. Expanding impervious cover through implementing pavement, sidewalks, and buildings can permanently alter soil function by preventing water infiltration, resulting in increased runoff and erosion.

Soils in the NEPA study area consist of approximately 3.8 acres of Enosburg loamy fine sand (EnB), 3 to 8 percent slopes; 4.4 acres of Colton gravelly sandy loam (CoC), 8 to 15 percent slopes; and 5.0 acres of Colton gravelly sandy loam (CoB), 3 to 8 percent slopes. A small percentage of the NEPA study area consists of Peru fine sandy loam (PeC), 8 to 15 percent slopes; and very stony Cabot silt loam (CbB), 3 to 15 percent slopes (Figure 7). Enosburg loamy fine sand is classified as prime farmland soil, if drained, and Colton gravelly sandy loam and Peru fine sandy loam are classified as farmland of statewide importance (USDA NRCS 2024). Soils in the NEPA study area vary widely in drainage class, ranging from poorly drained to excessively drained. Cabot silt loam soils as well as Enosburg loam fine sand are classified as poorly draining soils, while Colton gravelly sandy loam soils are classified as excessively drained. All soils within the NEPA study area are considered hydric with the exception of the Colton gravelly sandy loam soils.

The Richford Quadrangle covers portions of Berkshire, Richford, and Montgomery. Within the large-scale regional Northern Vermont-Southern Quebec tectonic framework, the Richford Quadrangle is located on the Cambridge-Richford-Valcourt Syncline (synclinorium) between the Enosburg Anticline (anticlinorium) to the west, and the Green Mountain-Sutton Mountain Anticlinorium to the east (Rosencrantz 1997). The NEPA study area is situated within the geological area of the Lower Cambrian rift clastics and volcanics capped by Ordovician phyllites, with the underlying bedrock consisting of schist and phyllite. Both of these are considered metamorphic rocks formed from the alteration of sedimentary rocks under heat and pressure. Schist is a medium-grained metamorphic rock, while phyllite is a foliated metamorphic rock formed from slate with fine-grained mica flakes.

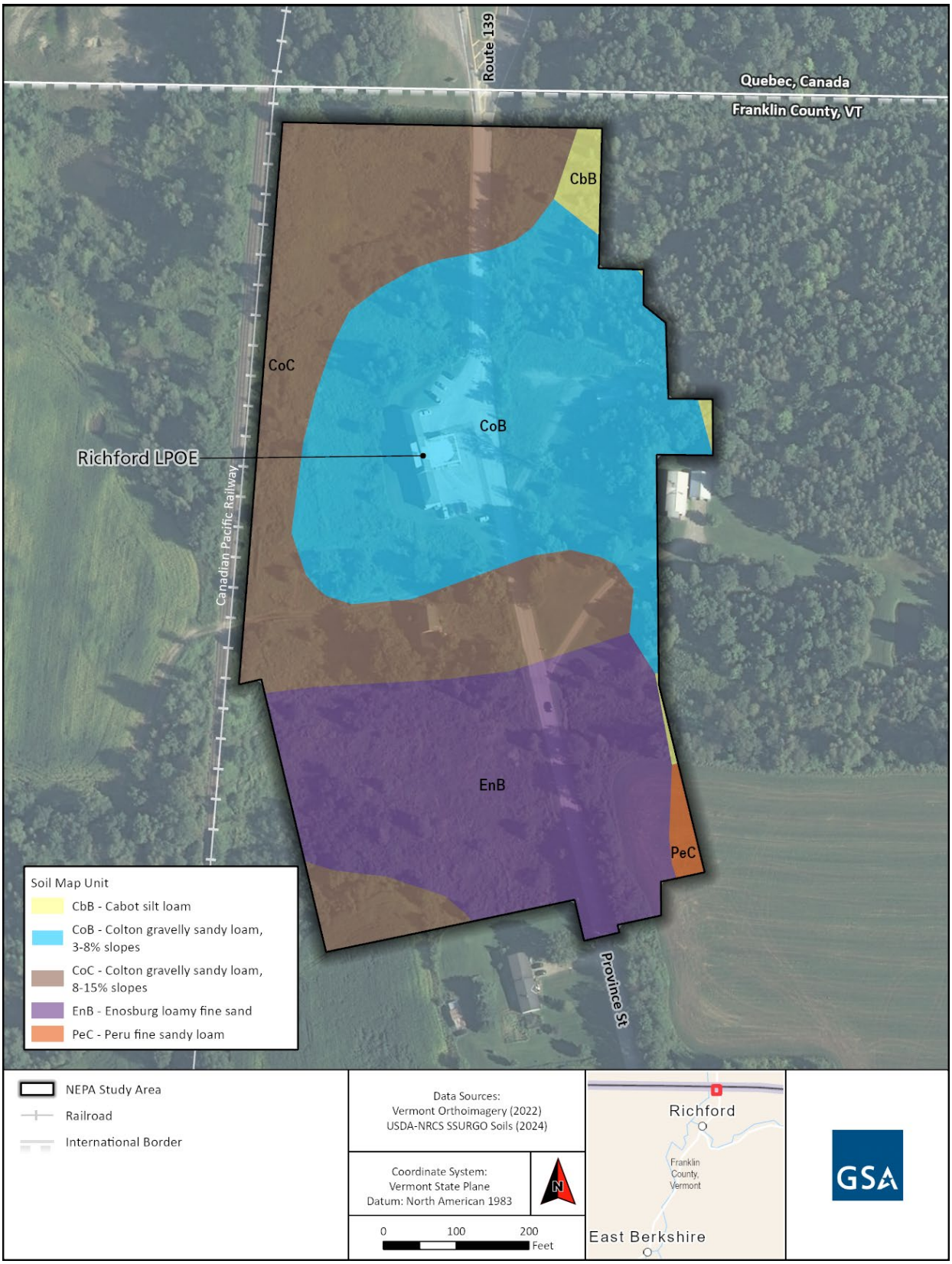

Figure 7. Soils in the NEPA Study Area

3.3.2 Environmental Consequences

Proposed Action Alternative

The Proposed Action would involve the demolition of the existing LPOE building. Demolition of older buildings can lead to contamination of soils if hazardous materials such as asbestos or lead are not properly managed. However, any hazardous waste generated or stored on site by the Proposed Action would follow necessary disposal protocols and procedures as described in Section 3.10, Solid Waste and Hazardous Materials.

The Proposed Action Alternative would involve the disturbance of approximately 4.4 acres of land through activities such as excavation, grading, and clearing during construction, which would impact soils. Of the 4.4 acres of soils that would be impacted, approximately 2.5 acres would be Colton gravelly sandy loam, 3 to 8 percent slopes; 1.1 acres would be Colton gravelly sandy loam, 8 to 15 percent slopes; and 0.8 acres would be Enosburg loamy fine sand, 3 to 8 percent slopes (Figure 8). As noted in Section 1.6, because the Proposed Action would permanently convert soils designated as prime farmland and farmland of statewide importance, GSA consulted with USDA NRCS, in accordance with the Farmland Protection Policy Act. Consultation was completed on January 16, 2025 (Appendix A).

Under the Proposed Action, the impervious area would increase from 1.1 acres to 3.5 acres, with a majority of the impervious area (3 acres) being converted into roadways/pavement. Pervious cover is generally more favorable for soil health as it aids in water absorption and erosion control (Pineo 2024). Increasing the impervious cover can alter the hydrologic cycle of landscapes and increase the demand for hydraulic flow that directly connects developed areas to receiving water bodies. The process of paving compresses the soil, reducing its porosity and ability to support plant life, leading to a decline in soils structure and health. Additionally, increasing roadway cover would ultimately lead to increased surface runoff, which can result in erosion. It is anticipated that approximately 0.5 acres of the pervious area would be designated for snow storage. However, the area needed for snow storage would vary annually depending on snowfall. Snow storage would impact the underlying soils in the form of nutrient leaching, where pollutants such as salts or fertilizers can leach into the soil through snow melt, harming the soil health and water quality (Daly and Wania 2004). Although soils would be disturbed as a result of construction, activities such as blasting that can fracture rocks, impacting their stability, would not take place; therefore, there would be no impact to geology as a result of the Proposed Action. However, grading may impact topography as it can alter the natural land contours, leading to alteration of natural drainage patterns, erosion, and sedimentation, and change in elevation.

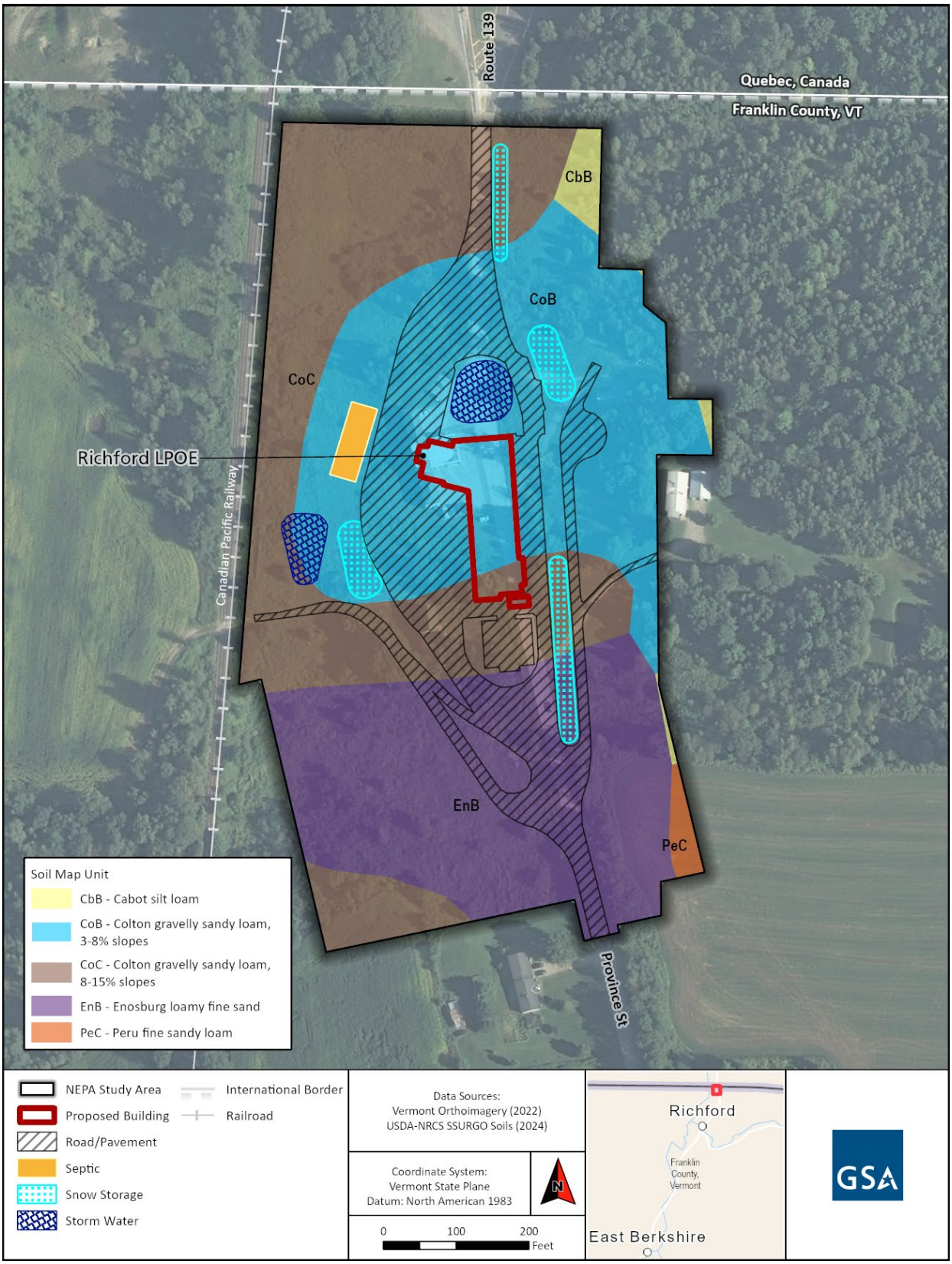

Figure 8. Soil Impacts as a Result of the Proposed Action Alternative

Erosion and sediment control measures would be developed and implemented prior to and during construction to minimize adverse impacts on soils. After construction is completed, temporarily disturbed areas would be revegetated to reduce the potential for erosion. Due to the permanent loss of soils as a result of increasing impervious cover within the NEPA study area, the Proposed Action is expected to have direct and indirect, permanent, moderate, site-specific adverse impacts to soil. Implementing the best management practices (BMPs) described in Section 5 would reduce impacts related to soil erosion. Construction activities would not affect underlying bedrock; therefore, there would be no impact on geology.

No Action Alternative

A new Richford LPOE facility would not be constructed under the No Action Alternative. Routine repairs and maintenance of the existing facility would be conducted and the LPOE would operate under the existing conditions. There would be no change to the existing conditions in the NEPA study area, and no impacts on geology and soils would occur.

3.4 Water Resources

This section discusses the affected environment and environmental consequences that would result under the Proposed Action for water resources in and near the NEPA study area, including surface waters, stormwater, wetlands, and groundwater resources.

3.4.1 Affected Environment

The NEPA study area lies within the Outlet Sutton Rivers sub watershed (Hydrologic Unit Code 043001070209), which is situated in the Richelieu basin (Hydrologic Unit Code 020100) (EPA 2024).

A wetland delineation was performed on October 19, 2023, and October 20, 2023, to determine the jurisdictional boundaries of wetlands in the vicinity of the proposed project area. Wetland boundaries were verified during a site visit with USACE and Vermont DEC on April 16, 2024. The wetland delineation covered an area totaling approximately 19.7 acres, including the entire 13.4-acre NEPA study area. Approximately 6.1 acres of wetlands were delineated during the site visit. However, only 3 acres lie within the NEPA study area. Wetland types present in the proposed area include Palustrine Emergent Persistent (PEM), Palustrine Forested (PFO), and Palustrine Scrub-Shrub (PSS). Wetlands included one PEM wetland (W01004), two PFO wetlands (W01001-C and W1003), and one PSS wetland (W01005-B). Wetlands were identified on both the east and west side of Vermont Route 139 (Figure 9).

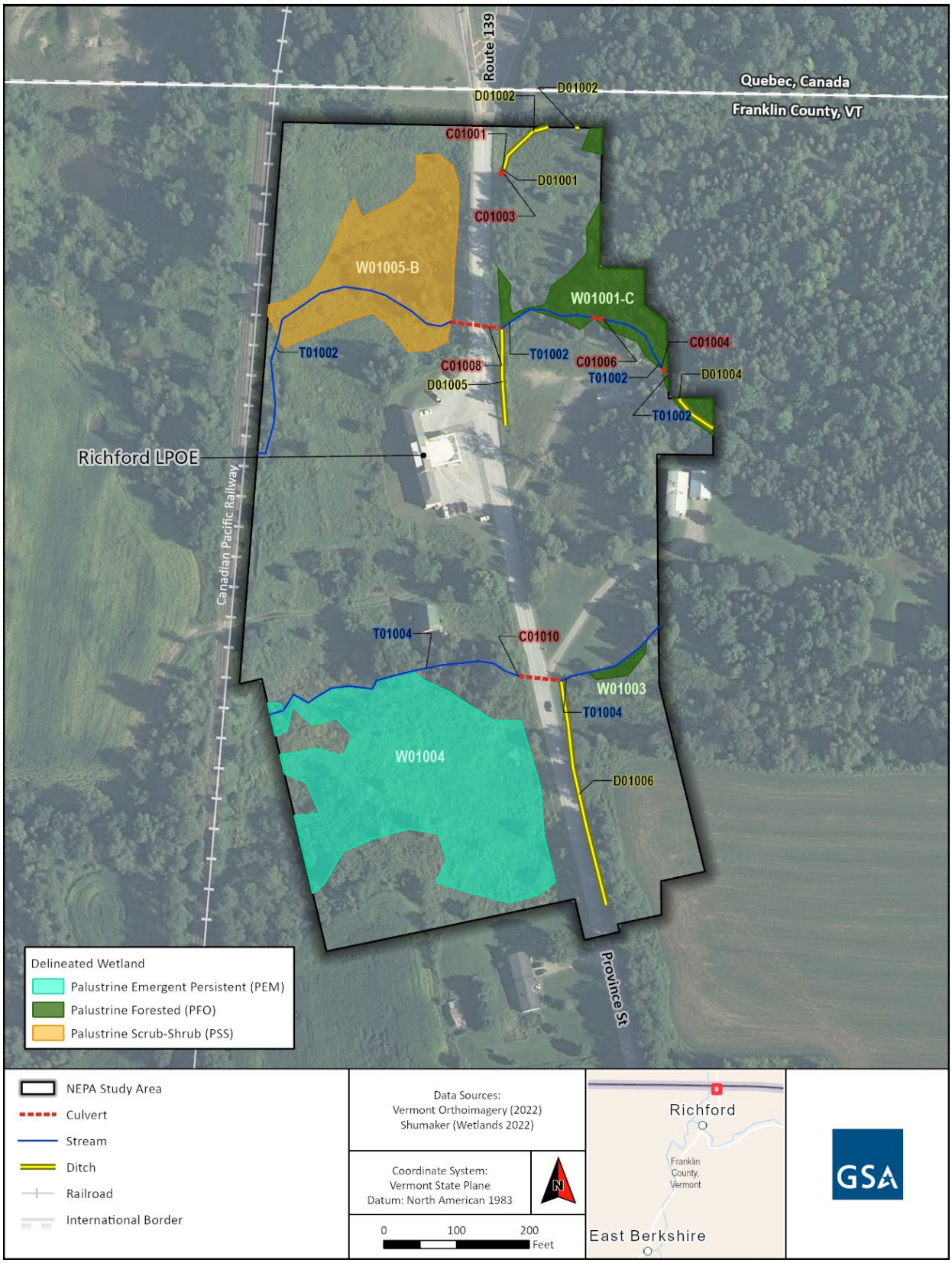

Figure 9. Water Resources in the NEPA Study Area

USACE issued a preliminary JD on July 23, 2024 (Appendix A), identifying all the delineated features listed in Table 3 as federally jurisdictional wetlands. Vermont DEC provided its determination of state wetland jurisdiction and classifications via email on July 19, 2024 (Appendix A). All the delineated features are Class II and jurisdictional under the Vermont Wetlands Rules, with the exception of one PFO feature (W01003), which is a Class III wetland. Class III wetlands are not regulated by the State of Vermont. More information regarding the coordination between GSA, USACE, and Vermont DEC can be found in Section 1.6. A summary of wetlands and water features identified during the field delineation and the amount within the NEPA study area is provided in Table 3.

Table 3. Summary of Delineated Features in the Proposed Project Area Vicinity

Feature	Vermont Wetland Class	Cowardin Code	Total Area Delineated (Acres)	Amount within NEPA Study Area (Acres)	Length within Delineated Area (Linear Feet)	Amount within NEPA Study Area (Linear Feet)
W01005-B	Class II	Palustrine Scrub-Shrub (PSS)	0.9	0.9	N/A	N/A
W01004	Class II	Palustrine Emergent Persistent (PEM)	2.2	1.7	N/A	N/A
W01001-C	Class II	Palustrine Forested (PFO)	2.9	0.4	N/A	N/A
W01003	Class III	Palustrine Forested (PFO)	<0.1	<0.1	N/A	N/A
T01002	N/A	Riverine, Intermittent (R4)	N/A	N/A	976	701
T01004	N/A	Riverine, Intermittent (R4)	N/A	N/A	1,069	536
D01001	N/A	Riverine Ephemeral (R6)	N/A	N/A	21	21
D01002	N/A	Riverine Ephemeral (R6)	N/A	N/A	132	76
D01004	N/A	Riverine Ephemeral (R6)	N/A	N/A	156	63
D01005	N/A	Riverine Ephemeral (R6)	N/A	N/A	133	133
D01006	N/A	Riverine Ephemeral (R6)	N/A	N/A	315	315
		Total	**6.1**	**3.0**	**2,802**	**1,845**

No ponds or lakes were identified within the NEPA study area. Six drainages directing water flow to two streams that flow west off the NEPA study area were delineated. All streams were intermittent, likely carrying stormwater off the NEPA study area during periods of heavy rain or snowmelt.

3.4.2 Environmental Consequences

Proposed Action Alternative

Construction activities for the modernized Richford LPOE facility, including land disturbance, clearing, and grading, would result in direct and indirect, temporary to short-term, moderate, site-specific and local adverse impacts on surface water resources, including wetlands and streams. Additional short-term, indirect, minor, local adverse impacts would potentially result from the operation of construction equipment, which would increase the potential for accidental leaks or spills of fuel, lubricants, or other materials that would contaminate nearby surface water.

The Proposed Action would permanently remove up to 1 acre of PEM and PSS wetlands, resulting in permanent, direct, moderate, site-specific, adverse impacts to wetlands (Figure 10). Permanent loss of wetlands as a result of the placement of fill would be necessary to accommodate the new LPOE building, roadways, and parking areas. Septic and snow storage areas would be placed in upland areas to avoid impacting wetlands.

Additionally, the Proposed Action would result in direct and indirect, temporary to permanent, moderate, site-specific adverse impacts to approximately 236 linear feet of streams within the NEPA study area. Under the Proposed Action, impervious cover would increase to approximately 3.5 acres, which would permanently impact approximately 66.4 linear feet of stream T01002 and 169.4 linear feet of stream T01004 (Figure 10). Increasing impervious cover would increase stormwater runoff, causing permanent, direct and indirect, minor, local, adverse impacts to water resources. However, these impacts would be minimized by incorporating stormwater bio-retention methods into the final design to manage stormwater on site using landscape features such as native grasses, forbs, and herbaceous species. In addition, stormwater design would be prepared in accordance with the 2017 Vermont Stormwater Management Manual Rule and Guidance as well as the Technical Guidance on Implementing the Stormwater Runoff Requirements for Federal Projects under Section 438 of the EISA. While adverse impacts to wetlands and delineated waterways would be unavoidable, GSA would mitigate 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 USACE and Vermont DEC.

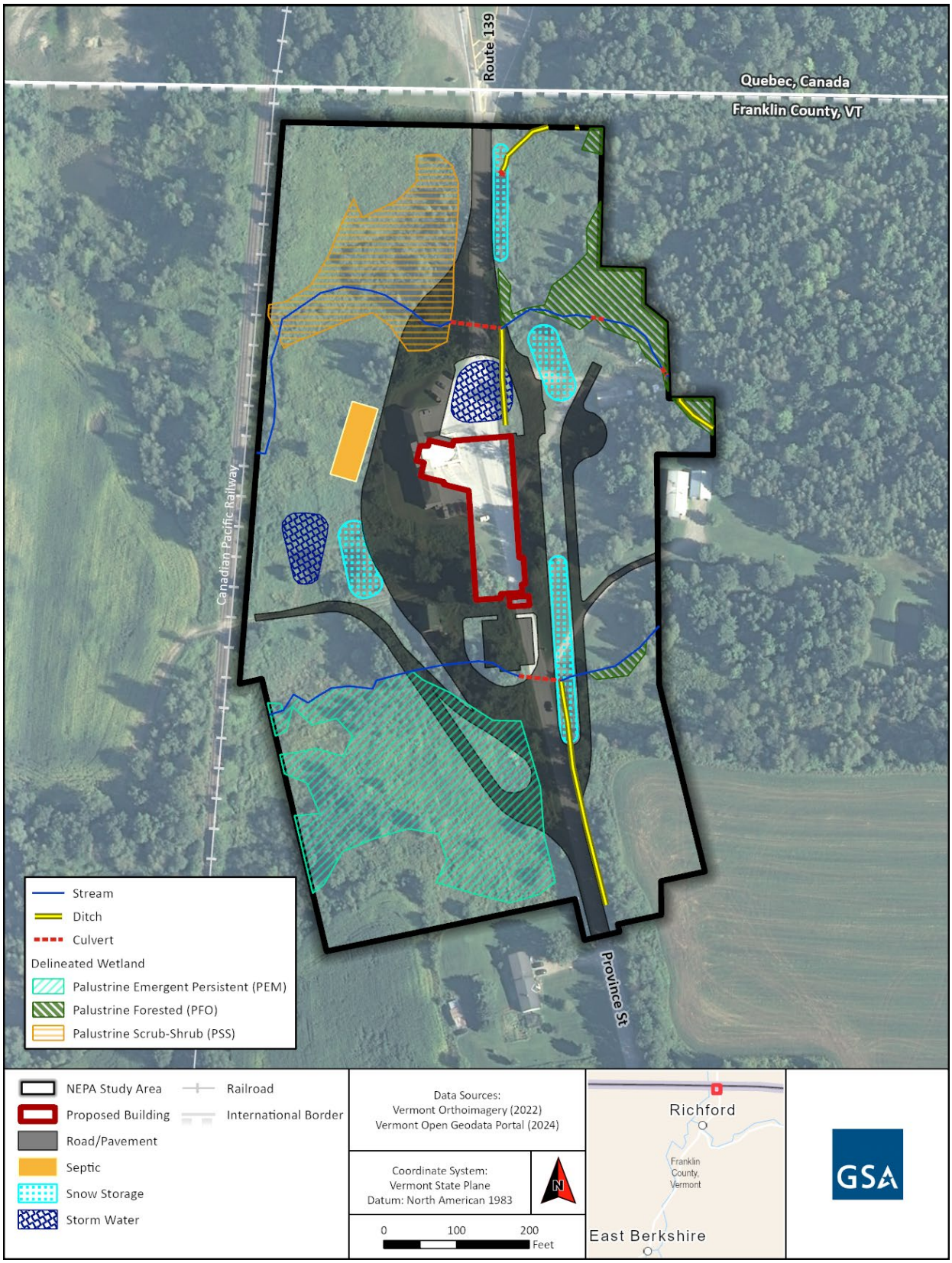

Figure 10. Wetland Impacts as a Result of the Proposed Action Alternative

In addition, GSA would implement BMPs to minimize impacts on surface water resources. 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. BMPs such as the use of drop cloths, proper storage of chemicals, and immediate treatment of spill areas with absorbents and soil removal are examples of measures that would be implemented in the event of accidental spills. GSA would obtain the required permits and would comply with the associated permit requirements. BMPs and mitigation measures are summarized in Section 5.

Under the Proposed Action, substantial earthwork would be required to prepare the site for construction of the new LPOE facilities. Due to the presence of shallow groundwater throughout the NEPA study area, contaminants could potentially seep into the groundwater following storm events, which may negatively affect groundwater quality. However, this is unlikely to drastically affect groundwater quality or availability within the NEPA study area or beyond because GSA would implement a Spill Prevention, Control, and Countermeasure (SPCC) Plan to minimize the potential for adverse effects. The SPCC Plan would be prepared prior construction. Additionally, the Proposed Action may lead to a slight reduction in groundwater recharge due to the increase in impervious surfaces which can result in reduced infiltration and increased surface runoff. Therefore, the Proposed Action would result in direct, temporary to permanent, minor, local, adverse effects to groundwater.

No Action Alternative

A new Richford LPOE facility would not be constructed under the No Action Alternative. Routine repairs and maintenance of the existing facility would be conducted and the LPOE would operate under the existing conditions. There would be no change to the existing conditions in the NEPA study area, and no new impacts on water resources would occur.

3.5 Wildlife and Habitat

This section discusses the affected environment and environmental consequences that would result under each alternative for wildlife, including special status species, and their habitat in and near the NEPA study area. Special status species include federal- and state-listed species and migratory birds.

3.5.1 Affected Environment

Of the 13.4-acre NEPA study area, 1.1 acres of the existing land cover is impervious area, leaving 12.3 acres for viable wildlife habitat. As described in Section 3.4, Water Resources, the NEPA study area contains approximately 3 acres of wetland habitat, consisting of PEM, PFO, and PSS wetlands, which provide habitat for a variety of wildlife species. The PEM wetland predominantly consists of herbaceous vegetation, including wrinkle-leaf goldenrod (*Solidago rugosa*), Canada goldenrod (*Solidago canadensis*), New England aster (*Symphyotrichum novae-*

angliae), and the invasive common reed (*Phragmites australis*). The two PFO wetlands consist primarily of red maple (*Acer rubrum*), American elm (*Ulmus americana*), green ash (*Fraxinus pennsylvanica*), and eastern hemlock (*Tsuga canadensis*). PSS wetland habitat is dominated by black willow (*Salix nigra*). Upland habitats are dominated by northern hardwood forest communities. The NEPA study area also includes two streams that flow westward off the NEPA study area.

Habitats in the NEPA study area provide suitable stopover or nesting habitat for a variety of resident and migratory birds. Migratory birds are protected under the Migratory Bird Treaty Act. According to the USFWS IPAC system, there are 10 species of migratory birds that have the potential to be present in the NEPA study area. These species are bald eagle (*Haliaeetus leucocephalus*), 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*) (USFWS 2024). Bald eagle was observed in the NEPA study area during field visits. USFWS considers all of these species to be Birds of Conservation Concern except bald eagle, which is protected under the Bald and Golden Eagle Protection Act (USFWS 2021).

The NEPA study area also provides suitable habitat for mammals, including beaver (*Castor canadensis*), chipmunk (*Tamiini*), eastern cottontail rabbit (*Sylvilagus floridanus*), eastern coyote (*Canis latrans*), gray fox (*Urocyon cinereoargenteus*), gray squirrel (*Sciurus carolinensis*), red squirrel (*Sciurus vulgaris*), moose (*Alces alces*), muskrat (*Ondatra zibethicus*), raccoon (*Procyon lotor*), red fox (*Vulpes vulpes*), striped skunk (*Mephitis mephitis*), white-tailed deer (*Odocoileus virginianus*, and woodchuck (*Marmota monax*). Wetland and stream habitats may also support amphibians (frogs and salamanders), reptiles (turtles, lizards, and snakes), and small fish. Garter snake (*Thamnophis sirtalis)*, wood frog (*Lithobates sylvaticus)*, and gray treefrog (*Hyla versicolor)* were observed during 2024 field visits. Based on a review of statewide open geodata provided via the Vermont Agency of Natural Resources, there are no known state-listed rare, threatened, or endangered species in the NEPA study area (Vermont ANR 2024).

As noted in Section 1.5, the USFWS IPAC system-generated official species list indicated that there are no federally listed species or critical habitats occurring in the NEPA study area (Appendix A). The monarch butterfly has been proposed for listing under the ESA and has the potential to occur within the NEPA study area. 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). Suitable habitat in the NEPA study area exists along the roadway and around edges of developed or previously disturbed areas. Monarch butterflies are migratory and are most likely to occur in the NEPA study area from May to October (VCE 2024). Monarch butterflies of the eastern population typically leave temperate

northern climates (such as that present in the NEPA study area) in the fall for wintering areas in Mexico (USFWS 2020).

The entirety of the NEPA study area lies adjacent to Vermont Route 139 and the Canadian Pacific Railway tracks and is subject to frequent noise and visual disturbances associated with railway and vehicular traffic. The presence of the railroad tracks and Vermont Route 139, as well as some commercial development and significant agricultural development surrounding the NEPA study area have resulted in fragmentation and slight degradation of habitat quality in the NEPA study area.

3.5.2 Environmental Consequences

Proposed Action Alternative

Under the Proposed Action Alternative, approximately 3.5 acres of the 12.3 available acres within the study area would be developed to accommodate the modernized and expanded LPOE facility, resulting in a permanent loss or modification of wildlife habitat. The Proposed Action Alternative would require removal of approximately 0.8 acres of trees, and impacts to up to 1 acre of wetlands and approximately 236 linear feet of streams. However, this would not represent a loss of high-quality habitat because the new development would be in or adjacent to currently developed or previously disturbed areas. While the lost habitat is not considered high-quality, it still represents a loss of shelter and potential food sources for species in the surrounding area. Therefore, the Proposed Action is anticipated to have direct, permanent, minor, local, adverse impacts on wildlife habitat.

Tree removal would adversely impact wildlife such as birds and mammals because trees provide shelter, nesting sites, and locations for breeding. Trees also create corridors that facilitate movement and migration for species groups such as birds and mammals. Similarly, the removal of wetland habitat would likely result in adverse impacts to wildlife and habitat because wetlands provide shelter, breeding grounds, and vital food resources to various species. Although there would be a permanent loss of wildlife habitat, the relatively small area being affected compared to the available habitat in the region would allow wildlife to continue utilizing nearby habitats. Therefore, the Proposed Action would not impact wildlife at the population level. Additionally, trees that would be removed are immediately adjacent to the existing LPOE site and Vermont Route 139 and do not provide high-quality habitat for wildlife. GSA would incorporate measures to avoid or minimize impacts to migratory birds, bald eagles, and Birds of Conservation Concern to the extent practical. 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 absence of nests in the proposed project area. Other BMPs would be implemented, such as 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, to protect nests from construction-related disturbance.

Disturbances to vegetation adjacent to roadways and developed areas would result in direct, short-term, minor, local adverse impacts to the monarch butterfly as these areas commonly provide suitable breeding (milkweed) and migratory habitat (wildflowers and other nectar sources) for the species. However, following construction, revegetation of temporary disturbance using a regionally appropriate native seed mix would help restore native vegetation and limit the potential for the introduction or spread of invasive species over the long term.

Impacts to surface water quality would also affect wildlife. Wetlands act as natural water reservoirs, helping to maintain local water tables as well as providing drinking water for all wildlife. Therefore, increases in turbidity and pollution as a result of construction would have direct, temporary, minor, local, adverse impacts on wildlife. As discussed in Section 3.4, increasing the impervious surface area would result in higher volumes of stormwater runoff, which can carry pollutants into nearby ecosystems, degrading water quality and harming aquatic and terrestrial wildlife. Impacts would be minimized by implementing measures to control soil erosion, sedimentation, and the discharge of any pollutants to surrounding water bodies, as described in Section 5. GSA would mitigate all unavoidable permanent wetland impacts in accordance with federal and state requirements as described above.

Noise and the presence of construction equipment and crews would temporarily disturb or displace wildlife, resulting in direct, temporary, minor, site-specific to local, adverse impacts. While construction would lead to an increase in noise levels beyond baseline conditions, the Richford LPOE is a relatively busy LPOE that regularly experiences noise associated with traffic and LPOE operations. Therefore, species in the surrounding areas are likely accustomed to noise and disturbances. Levels of noise and visual disturbances would return to baseline conditions after construction is complete. Wildlife that may be displaced during construction would likely move to nearby habitats that provide similar resources for shelter, food, and breeding.

Implementation of the Proposed Action would not affect any wildlife species at the population level because of the small amount of habitat that would be removed or modified and the limited quality of wildlife habitat that the site provides because of the existing development. Overall, the Proposed Action Alternative would result in direct, temporary to permanent, minor, site-specific and local adverse impacts to wildlife and wildlife habitat. No threatened or endangered species occur within the NEPA study area; therefore, there would be no impacts on threatened and endangered species. As noted in Section 1.5, if the Proposed Action is selected for implementation and the monarch butterfly, which is currently proposed for listing as a threatened species, or any other new species that has the potential to occur in the action area, becomes listed under the ESA prior to implementation, GSA would reinitiate consultation with USFWS in accordance with Section 7 of the ESA.

No Action Alternative

A new Richford LPOE facility would not be constructed under the No Action Alternative. Routine repairs and maintenance of the existing facility would be conducted and the LPOE would operate under the existing conditions. There would be no change to the existing conditions in the NEPA study area, and no new impacts on wildlife or wildlife habitat would occur.

3.6 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 associated with the past and present use of an area. A cultural resource can represent past cultures or modern-day cultures, and can be composed of physical remains, intangible traditional use areas, or an entire landscape. Buried cultural resources are usually referred to as archaeological sites.

3.6.1 Affected Environment

The potential effects of the project alternatives on historic resources are evaluated in this EA, as required by NEPA. GSA must also identify and assess the effects its actions may have on cultural resources in accordance with Section 106 of the National Historic Preservation Act. These evaluations can be integrated under the NEPA analysis or completed separately. For this project, GSA has elected to perform these evaluations separately.

GSA has initiated Section 106 consultation with the Vermont SHPO, as set forth in 36 Code of Federal Regulations 800.3. Through the Section 106 consultation process, GSA will identify impacts on cultural resources and, if necessary, negotiate measures to avoid, minimize, or mitigate adverse effects.

The NEPA study area for the proposed modernized Richford LPOE is approximately 13.4 acres and includes the existing property, parts of the surrounding properties, and portions of Vermont Route 139 directly abutting and near the properties. The Area of Potential Effects (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, which have the potential for impacts on archaeological and historic resources within the study area.

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 2024). Therefore, any archaeological deposits present are likely to be located at shallow depths.

An Archaeological Resources Assessment was conducted by Hartgen Archeological Associates, Inc. (Hartgen) in August 2024. This investigation included documentary research using the Vermont Online Resource Center (ORC), which is maintained by the VDHP, as well as consultation of historic mapping. The ORC contains an inventory of previously conducted cultural resource surveys, previously recorded archaeological sites, historic properties listed in both the National Register of Historic Places (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. This assessment resulted in the identification of eight Archaeologically Sensitive Areas (ASAs) within the APE. Five of the ASAs are located on the western side of Province Street. The remaining three ASAs are located on the eastern side of the APE within an open agricultural field in the southeast corner, along the eastern side of Province Street, and in the northeast corner.

Areas of historic sensitivity are identified based on proximity to previously documented historic archaeological sites, map-documented structures, or other documented historical activities (e.g., battlefields). The investigation also identified that four of the eight ASAs are sensitive for historic cultural materials in addition to precontact materials. These four ASAs include the area of land immediately along the border with Canada and three areas containing map-documented structures.

PAL previously conducted a cultural resources survey in September 2004 at the Richford LPOE property (PAL 2005). PAL excavated eight 50- by 50-centimeter test pits within the manicured lawn behind the existing LPOE facility in the area identified as ASA 3 by Hartgen. The survey did not identify any significant cultural materials or features.

Historic Resources

Pursuant to Section 106 of the NHPA, a Historic Resources Identification (HRI) assessment was completed to identify historic properties listed or eligible for listing in the NRHP that would be affected by the Proposed Action (Hartgen 2024). The HRI assessment included background research using the Vermont ORC, which maintains records for the VDHP, and a site visit conducted on June 25 and 26, 2024, to observe and photograph existing conditions within the

study area. The HRI assessed a 13.2-acre study area encompassing the existing Richford LPOE property, parts of the surrounding properties, and portions of Vermont Route 139 directly abutting and near the properties. The HRI identified four resources within the study area. Two resources did not meet the age requirement for NRHP evaluation, one resource was not eligible due to lack of integrity, and one resource was previously listed in the NRHP. This historic resource, the U.S. Inspection Station—Richford, Vermont (also known as the Richford Inspection Station or Richford Border Inspection Station), was listed in the NRHP in 2014 under Criterion A (Starzak et al. 2011).

The existing LPOE was built in 1932 and consists of a one-and-one-half-story, Colonial Revival-style, brick-veneer station building flanked by symmetrical one-story wings containing inspection bays. The elongated station building faces east/northeast toward Vermont Route 139. A circa-1972 metal porte cochere or inspection canopy supported on metal posts extends east from the front eave of the station over two vehicle lanes. The southbound lanes of Vermont Route 139 bend west for inspection adjacent to the building before returning to the Vermont Route 139 alignment. Because the resource occupies a sharply descending grade, the west side of the building has an exposed lower level with exterior access.

As a result of changes to the building's windows, garage doors, and siding, and the replacement of the original porte cochere, the existing Richford LPOE was not determined eligible for the NRHP under Criterion C, for architecture. However, the Richford facility retains the associative attributes required to convey significance under Criterion A, as defined in the Multiple Property Documentation Form 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 existing Richford LPOE 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:E6, F28).

3.6.2 Environmental Consequences

Proposed Action Alternative

Archaeology

The areas of disturbance for the Proposed Action Alternative, as currently designed, would intersect with two areas of archaeological sensitivity. For all areas of ground disturbance within the intersected ASAs that have not previously been surveyed, the testing methodology will be designed to identify any potentially significant archaeological and historic architectural resources not previously identified according to all Vermont SHPO standards and guidelines.

As noted in Section 1.5.2, GSA has initiated Section 106 consultation with the Vermont SHPO. Through the Section 106 consultation process, GSA will identify impacts on cultural resources and, if necessary, negotiate measures to avoid, minimize, or mitigate adverse effects.

Additional investigation is needed to determine if there are archaeological resources that would be affected by the Proposed Action Alternative. If cultural resources are discovered during ground-disturbing activities, effects would be permanent, direct, major, site-specific, and adverse or beneficial. Adverse effects would occur in the unlikely event that cultural resources were damaged during discovery. Beneficial effects would occur if cultural resources were discovered and preserved.

Historic Resources

The Proposed Action Alternative would require full demolition of the existing NRHP-listed Richford LPOE to accommodate construction of new inbound lanes and a new and larger two-story LPOE building between the inbound and outbound lanes of Vermont Route 139. The Proposed Action Alternative would result in permanent, direct, major, site-specific, adverse impacts to historic resources.

No Action Alternative

Archaeology

A new Richford LPOE facility would not be constructed under the No Action Alternative. Routine repairs and maintenance of the existing facility would be conducted and the LPOE would operate under the existing conditions. There would be no change to the existing conditions in the NEPA study area, and no impacts to archaeological resources would occur.

Historic Resources

Under the No Action Alternative, the existing Richford LPOE would continue to operate in its current condition, and GSA would neither rehabilitate the historic resource nor demolish it to build a new Richford LPOE facility. The No Action Alternative would potentially result in direct, long-term, moderate, site-specific, adverse impacts to historic resources due to potential ongoing structural deterioration.

3.7 Socioeconomics

This section describes the socioeconomic environment in the vicinity of the NEPA study area in Franklin County and in the state of Vermont. Socioeconomic areas of discussion include local and county demographic and employment information. It considers potential changes in socioeconomics during both construction and long-term operations at the LPOE.

3.7.1 Affected Environment

Demographics

Demographic characteristics of Franklin County and the state of Vermont are provided in Table 4. Overall, age demographics, minority status, level of education, and veteran status are similar between Franklin County and the state of Vermont.

Table 4. Demographics for Franklin County, Vermont

Area	All Individuals	Population Under 18 Years of Age	Population over 65 Years of Age	Minority*	High School Graduates**	Veterans
Franklin County	50,101	21.6%	16.8%	11%	91.9%	6.8%
State of Vermont	643,816	18.1%	20.3%	12%	94.2%	6.5%

Source: U.S. Census Bureau 2022a-d
* Minority populations include all races that are non-White and Hispanic populations that are White.
** Percentage of population over 25 years of age with a high school diploma or higher level of education.

Employment and Income

Franklin County and the state of Vermont employment and income characteristics are detailed in Table 5. Franklin County has a slightly lower median household income than the state of Vermont. Additionally, a higher percentage of the population in Franklin County is below the poverty level than in the state of Vermont. However, the unemployment rate in Franklin County is slightly lower than the unemployment rate in the state of Vermont.

Table 5. Employment and Income for Franklin County, Vermont

Area	Number of Households	Median Household Income	Households Below Poverty Level	Unemployment Rate (2022)
Franklin County	19,233	73,633	7.2%	2.2%
State of Vermont	265,858	74,014	5.9%	2.5%

Source: U.S. Census Bureau 2022e

Commuting Patterns

A high percentage (87 percent) of workers in Franklin County use private vehicles for commuting to work, either driving alone or in a carpool. The average commuting time in Franklin County is approximately 26 minutes (U.S. Census Bureau 2022e).

Protection of Children

Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks, requires that federal actions be assessed for health impacts to children. No schools, daycares, or other public or private facilities known to be frequently occupied by children are in the vicinity of the NEPA study area.

3.7.2 Environmental Consequences

Proposed Action Alternative

The Proposed Action Alternative would include land acquisition and construction within the study area. Under the Proposed Action Alternative, GSA would acquire portions of privately owned land from two different landowners along Vermont Route 139, along with a portion of Vermont Route 139, and cause the displacement of a residential tenant. GSA would reestablish driveways of both landowners south of the new LPOE facility. One landowner is Pleasant Valley Farms, which manages active farmland, a gravel pit, a maple sugaring operation, and a rental residence. The other landowner is an owner-occupied residence. Table 6 shows the approximate acreage required for the Project, listed by tax parcel number. GSA would work to minimize the Project's overall site acquisition area and minimize impacts to private property adjacent to the new LPOE facility. Further, GSA would coordinate with the two landowners to maintain access to their properties during and after construction.

GSA would acquire private property in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies for Federal and Federally Assisted Programs 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. There would be direct, permanent, moderate, site-specific, and adverse effects to private property owners whose properties would be acquired for and impacted by construction of the modernized LPOE.

The approximate number of acres to be acquired from each parcel under the Action Alternative are outlined in Table 6.

Table 6. Acquisition Acreage Per Tax Parcel

Parcel	Acquisition Acreage (approximate)
PS0693 (706 Province Street, South)	0.10
PS0696 (696 Province Street)	0.80
PS0693 (706 Province Street, North)	0.60
PS0693 (693 Province Street)	4.00

The Proposed Action Alternative is anticipated to result in indirect, temporary, minor, local adverse impacts to local employment and income through potential revenue loss during closure of the Richford LPOE for construction. Under the Proposed Action Alternative, the Richford LPOE would be closed for approximately 24 months. Local businesses relying on visitors traveling through the LPOE may experience decreased patronage. Commuters looking to enter or exit the United States at the Richford LPOE would have to extend their travel time and detour to another Port of Entry. Three LPOEs, Pinnacle, East Richford, and West Berkshire, are located approximately 3, 7, and 11 miles from the Richford LPOE, respectively. However, because the Pinnacle LPOE and the East Richford LPOE have shorter hours of operation (8:00 am – 4:00 pm) compared to the Richford LPOE (8:00 am – 8:00 pm), all cross-border traffic between the hours of 4:00 pm and 8:00 pm would need to use the West Berkshire LPOE, potentially resulting in additional delays.

It is unlikely that many visitors planning to visit the Richford area by passenger vehicle would be deterred by the detour. However, travelers may need to adjust travel plans to account for shorter operating hours at the Pinnacle and East Richford LPOEs or for potential delays at the West Berkshire LPOE. Visitors traveling to the town of Richford by bicycle may be deterred by longer travel times to their destinations using the available detour routes.

Commercial trucks would be diverted to utilize the West Berkshire LPOE during construction because the Pinnacle and East Richford LPOEs do not process commercial traffic. Commercial traffic may experience longer waiting times for entrance because the West Berkshire LPOE is smaller than the Richford LPOE and is accustomed to lower volumes of commercial traffic. Longer wait times at the alternate LPOEs are not anticipated to noticeably adversely impact commerce because the increased traffic congestion is not likely to deter commercial trucks from traveling across the border. Upon project completion, traffic and commuting patterns at both LPOEs are expected to resume as normal.

The Jay Peak Resort is a popular destination for skiers and acts as a significant source of economic activity in the region. Visitors to the Jay Peak Resort often travel across the U.S.-Canada border (Jay Peak Resort 2024a). Although it is unlikely that many visitors would be deterred from visiting the area due to the detour during construction, if the nearby LPOEs

identified as a detour were to experience extensive delays or closures, this may have an adverse impact on Jay Peak Resort, along with other businesses in the area.

During construction, some businesses may experience decreased patronage as visitors adjust travel plans to account for additional travel time due to detours, shorter operating hours at the Pinnacle and East Richford LPOEs, and potentially longer wait times at the West Berkshire LPOE. For example, restaurants may experience a loss of business revenue during typical dinner hours if visitors returning to Canada depart earlier to use the Pinnacle or East Richford LPOEs, which close at 4:00 pm.

During construction, direct, temporary, minor, local, beneficial impacts to local employment and income would be anticipated through increases in temporary employment associated with construction of the new LPOE. During operation, the modernized LPOE is anticipated to improve efficiency and reduce wait times for commercial vehicles and visitors traveling through the LPOE through the construction of additional lanes and service infrastructure. Overall, the Proposed Action Alternative is expected to have direct and indirect, temporary to permanent, minor, local adverse and beneficial impacts to socioeconomics.

No Action Alternative

A new LPOE facility would not be constructed under the No Action Alternative. As a result, there would be no change in employment and income because neither temporary nor permanent jobs would be created. Routine repairs and maintenance of the existing facility would be conducted and the LPOE would operate under the existing conditions. There would be no impacts to socioeconomics as a result of the No Action Alternative.

3.8 Traffic, Transportation, and Parking

This section assesses current traffic and transit elements at the Richford LPOE and evaluates how these may be affected by the construction of a new LPOE facility. It considers potential changes in traffic volume, circulation, and parking demand during both construction and long-term operations, and acknowledges public transit in the surrounding area.

3.8.1 Affected Environment

The following sections discuss existing conditions at the Richford LPOE, with a focus on public transit, the regional train network, parking, and vehicular traffic.

Public Transit

The Richford LPOE is located in a rural area of northern Vermont with limited public transportation. Green Mountain Transit, the only regional transit authority in the state of Vermont, offers transit services to the town of Richford with one route available connecting St.

Albans and Richford. The nearest stop to the Richford LPOE is situated in downtown Richford, approximately 1.5 miles south of the Richford LPOE.

There is no commuter train service in Richford. The nearest commuter train station is located in St. Albans. Situated west of the NEPA study area is the Canadian Pacific Railway, which primarily serves as a freight railway.

Parking

Ten parking spaces are provided at the Richford LPOE, with five on the north side of the building and five on the south. All parking is enclosed by the driving lanes that direct traffic into inspection booths, which can create confusing traffic patterns and potential traffic hazards. Additionally, due to the parking configuration, spaces are limited for both northbound and southbound visitors, as barricades currently separate the northern and southern parking spaces.

Traffic

According to data from the Bureau of Transportation Statistics, the Richford LPOE receives a relatively low volume of traffic compared to larger border crossings in Vermont. The Richford LPOE trails well behind both the Derby Line LPOE (located at the terminus of Interstate 91) and the Highgate Springs LPOE (located at the terminus of Interstate 89) in overall traffic volume. In 2024, a total of 92,270 vehicles crossed the Richford LPOE, comprising a diverse mix of vehicle types, including 84,318 personal vehicles and 7,952 commercial vehicles (Bureau of Transportation Statistics 2025). This port averages about 300 cars and 15 trucks per day, although it is higher in the summer and less traveled in the winter months. CBP staff commute primarily via passenger vehicle. The town of Richford's population has experienced minimal fluctuations in recent years, with a slight increase from 2,331 in 2022 to 2,337 in 2023, and a projected 2,343 in 2024 (Neilsberg 2024). This growth rate of approximately 0.26 percent annually is negligible and does not significantly impact traffic volumes at the Richford LPOE. Regardless of population trends in Richford, the Richford LPOE has seen an overall decline in number of crossings since 1996 (Bureau of Transportation Statistics 2025). Consequently, local population trends appear to have a minimal effect on border crossing operations at the Richford LPOE.

3.8.2 Environmental Consequences

Proposed Action Alternative

Under the Proposed Action Alternative, no impacts to public transit are anticipated. The Proposed Action would expand and improve parking for both visitors and employees and includes the addition of seven visitor parking spaces and 13 employee spaces, as well as three soft secondary parking spaces for additional inspections, if needed. Furthermore, the new LPOE building would offer parking for employees and one parking space for trucks, located on the east

side of the building. These changes would meet the need for facility expansion and partially address the existing issue of space constraints. Quantities and configuration are currently considered estimates that are subject to change during final design.

Under the Proposed Action Alternative, the Richford LPOE would be closed for approximately 24 months. During that time, people entering the United States at the Richford LPOE would have to extend their travel time and detour to another Port of Entry. Non-commercial traffic would be detoured to use the Pinnacle LPOE, which is 3.3 miles west of the Richford LPOE, and the East Richford LPOE, which is 7 miles east of the Richford LPOE. Commercial trucks would be diverted to use the West Berkshire LPOE during construction, which is approximately 11 miles west of the Richford LPOE, and may experience longer wait times for processing, as the LPOE is smaller and typically accustomed to lower volumes of commercial traffic. Because people would need to use other nearby Ports of Entry, traffic would likely increase at these Ports of Entry, potentially increasing wait times to cross the border. Additionally, because both the Pinnacle LPOE and the East Richford LPOE have shorter hours of operation (8:00 am – 4:00 pm) compared to the Richford LPOE (8:00 am – 8:00 pm), all cross-border traffic between the hours of 4:00 pm and 8:00 pm would need to use the West Berkshire LPOE, potentially resulting in additional delays.

The proposed improvements to the Richford LPOE would improve traffic flow and increase inspection efficiency over the long term for both commercial and non-commercial traffic by adding inbound and outbound lanes, as well as a new inspection plaza and canopy where additional secondary inspection booths would be provided. Upon completion of the Proposed Action, capacity is expected to increase for both commercial and passenger vehicles (GSA 2024). Overall, the Proposed Action Alternative is expected to have direct, temporary, minor, regional adverse impacts and direct, permanent, minor, site-specific and local beneficial impacts on traffic, transportation and parking.

No Action Alternative

A new Richford LPOE facility would not be constructed under the No Action Alternative. Routine repairs and maintenance of the existing facility would be conducted and the LPOE would operate under the existing conditions. However, not constructing the new LPOE facility would exacerbate parking issues, as the current facility lacks sufficient spaces for visitors and employees. The proposed increase in parking capacity is intended to support both visitor access and employee convenience, ultimately enhancing overall site functionality and user experience. Without these improvements, there could be continued limitations in parking availability and

reduced accessibility. Therefore, the No Action Alternative would result in direct, long-term, minor, site-specific, adverse impacts on parking.

3.9 Aesthetics (including Dark Skies)

This section assesses current aesthetics (including dark skies) at the Richford LPOE and surrounding vicinity and evaluates how aesthetics and dark skies may 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.

3.9.1 Affected Environment

The existing Richford LPOE was built in 1932 and consists of a one-and-one-half-story, Colonial Revival-style, brick-veneer station building. It is aesthetically similar to other LPOEs throughout the region and its style and appearance are typical of LPOEs that were constructed as a part of the federal building campaign from 1930 to 1943. The historic LPOE is described under Section 3.6, Cultural Resources.

The Richford LPOE follows typical modern design and lighting standards for federal buildings. The Richford LPOE is located in a relatively rural area and has a low level of light pollution. The Canadian Abercorn LPOE is visible just north of the U.S.-Canada border. There is a clear line of sight between the two LPOEs, and they share similar lighting and design features. There are few residences in the area that are visible from the LPOE. Lighting from the Richford LPOE may be visible to some surrounding residences at night, but does not have a significant impact on overall light pollution or night sky quality in the area.

The proposed project area is approximately 6 miles from the Jay State Forest and other natural areas in both the United States and Canada. The vast majority of the broader region is remote, forested, and undeveloped.

Table 7 includes Bortle Dark-Sky scale classifications, a system that measures the night sky's brightness. The LPOE is designated as a class 4.5 on the Bortle scale. A class 4.5 can be characterized as rural/suburban transition. At this scale, the sky is noticeably brighter than the surrounding terrain and the Milky Way is visible but lacks finer detail. Closer to the center of the town of Richford, light pollution domes are slightly more visible and objects on the ground are partly lit. This is because there are more lighted structures located closer together. Farther away from the LPOE, outside of the town of Richford, the Milky Way appears brighter and more detailed to onlookers. Domes of light pollution are visible along the horizon and objects on the ground are vaguely visible. North of the LPOE in Canada, bands of light pollution are apparent on the outskirts of the city of Montreal and surrounding suburbs and nearby towns. Figure 11 depicts light pollution in the town of Richford and the greater region.

Table 7. Bortle Dark-Sky Scale Classifications

Class	Description	Observing Conditions
1	excellent dark-sky site	Excellent seeing, ideal for observing faint deep-sky objects, galaxies, and nebulae.
2	rural or remote site	Very good seeing, fainter deep-sky objects are visible, but some light pollution may still be present on the horizon.
3	rural sky	Good seeing, but light pollution is still a factor.
4	rural/suburban transition	Moderate seeing, the Milky Way is still visible, but light pollution is a significant factor.
5	suburban sky	Poor seeing, the Milky Way is barely visible, and only the brightest Messier objects are visible.
6	bright suburban sky	Very poor seeing, only the brightest stars are visible, and the sky appears washed out.
7	suburban/urban transition	Extremely poor seeing, only the Moon, planets, and a few bright stars are visible.
8	city sky	Virtually no seeing, only the Moon and a few planets are visible, and the sky appears yellow or orange.
9	inner-city sky	No seeing, only the Moon and a few planets are visible, and the sky appears red or yellow.

Source: Lens Astrophotography 2024

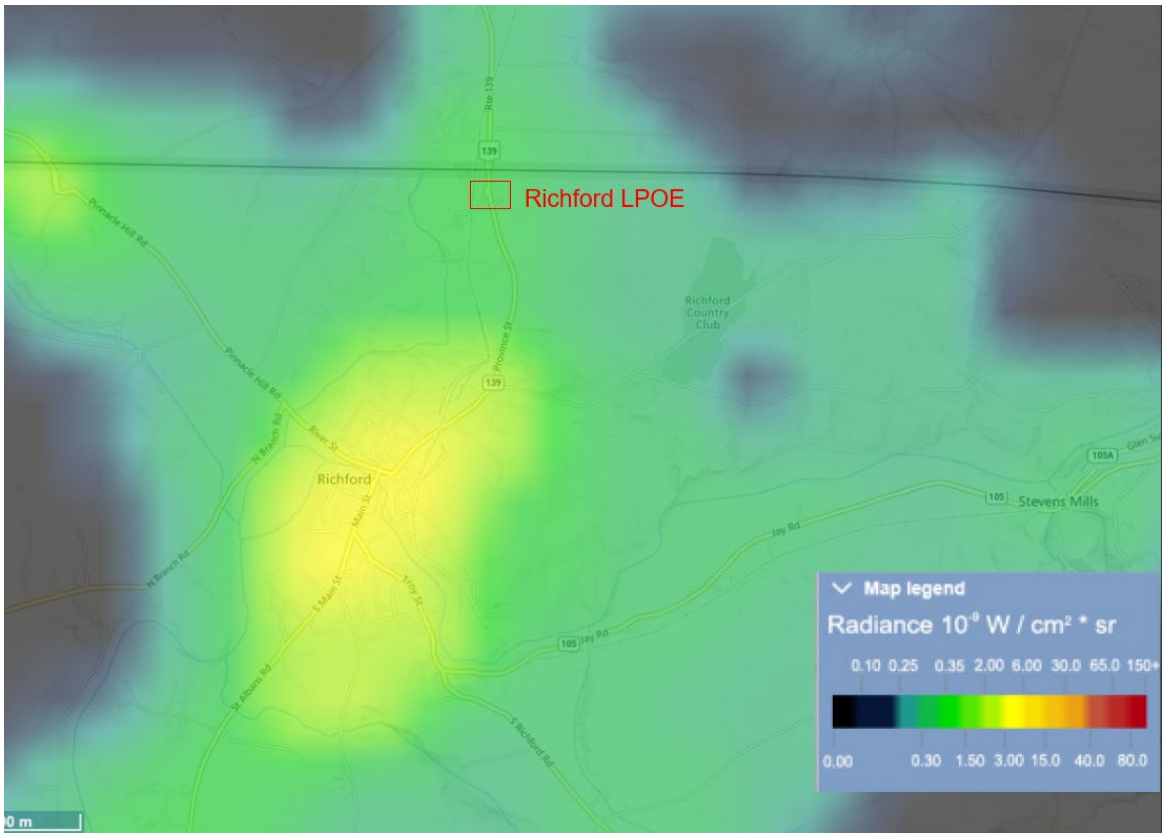

Figure 11. Light Pollution in the Project Region
Source: Clear Dark Sky 2024

3.9.2 Environmental Consequences

Proposed Action Alternative

The Proposed Action Alternative would alter the existing visual landscape by replacing the existing Richford LPOE with a larger, modernized facility. The new building would be located within and adjacent to the existing building footprint and would follow modern design and lighting standards for federal buildings. The exterior of the building would include inbound and outbound lanes, a secondary inspection canopy, and additional parking, with an overall site disturbance of up to 4.4 acres. The visual impact of the new LPOE would be consistent with the existing commercial development in the vicinity and would look dramatically different from the existing LPOE, which was constructed in 1932, though the NEPA study area would still appear relatively rural. Although the exact location, quantity, and intensity of lighting at the new LPOE would be determined during the final design process, the NEPA study area would still be categorized as rural/suburban on the Bortle scale. The improved facility would be designed to reduce light pollution and light trespass as reasonably achievable, and would be consistent with the PBS Interim Core Building Standards (GSA 2025b) and the CBP LPOE Design Standard. The Proposed Action Alternative would result in direct, permanent, negligible to moderate, site-specific beneficial or adverse impacts on aesthetics. The adverse or beneficial impact resulting from the change from the existing LPOE design to the modernized LPOE design would depend

on individual preference and perspective. Some may prefer the look of the existing LPOE, while some may prefer the look of the new modernized LPOE. Potential impacts to dark skies would be negligible.

No Action Alternative

A new Richford LPOE facility would not be constructed under the No Action Alternative. Routine repairs and maintenance of the existing facility would be conducted and the LPOE would operate under the existing conditions. There would be no change to the existing conditions in the NEPA study area. Therefore, no impacts on aesthetics (including dark skies) would occur.

3.10 Solid Waste and Hazardous Materials

The following section assesses solid waste and hazardous materials in the vicinity of the NEPA study area. It considers solid waste and hazardous materials that would be generated during demolition, construction, and long-term operation of a modernized Richford LPOE.

3.10.1 Affected Environment

A Phase I Environmental Site Assessment was completed for each of the parcels in the vicinity of the proposed project area, and site reconnaissance was conducted in November 2023. A Phase I Environmental Site Assessment was completed in October 2024 at the existing Richford LPOE and properties within the NEPA study area. The assessment was performed in accordance with the American Society of Testing and Materials (ASTM) Standard Practice for the Phase I Environmental Site Assessment Process (ASTM Designation: E1527–21) and the U.S. Environmental Protection Agency Standard Practice for All Appropriate Inquiries (40 Code of Federal Regulations part 312) under the Comprehensive Environmental Response, Compensation, and Liability Act. The main objective of the Phase I Environmental Site Assessment was to identify recognized environmental conditions (RECs) in the study area. ASTM E1527–21 defines an REC as (1) the presence of hazardous substances or petroleum products in, on, or at a property due to a release to the environment, (2) the likely presence of hazardous substances or petroleum products in, on, or at a property due to a release or likely release to the environment, or (3) the presence of hazardous substances or petroleum products in, on, or at a property under conditions that pose a material threat of a future release to the environment. A REC that has been addressed to the satisfaction of regulatory authorities and is allowed to remain in place subject to controls, is referred to as a controlled REC (CREC). A previous REC that has been addressed to the satisfaction of regulatory authorities and meets the criteria for unrestricted use without any controls, is referred to as a historical REC (HREC).

The Phase I Environmental Site Assessment assessed the likelihood of site contamination through visual observations, historical use reviews, and regulatory records. No RECs, CRECs, or HRECs were identified at the existing Richford LPOE or the portions of the properties identified for land acquisition under the Action Alternative.

The LPOE uses a garbage dumpster located on the north end of the property for waste disposal. The state of Vermont currently has one operational landfill, located in Coventry, Vermont, approximately 35 miles east of the Richford LPOE.

There are two 250-gallon fuel oil aboveground storage tanks (ASTs) and five 100-gallon propane ASTs at the existing LPOE. The ASTs appeared to be in good condition. There is likely a heating oil tank in the residence to be acquired south of the existing Richford LPOE.

3.10.2 Environmental Consequences

Proposed Action Alternative

Under the Proposed Action Alternative, the demolition of the existing Richford LPOE may require the removal and disposal of toxic materials such as lead paint and asbestos, which are likely present due to the age of the existing buildings. Throughout demolition and construction, GSA would comply with applicable federal and state laws governing the use, generation, storage, transportation, and disposal of solid and hazardous materials. It is assumed that all non-hazardous waste generated as a result of the Proposed Action Alternative would be disposed of in-state at the landfill in Coventry, Vermont. While there are no RECs, CRECs, or HRECS at the existing Richford LPOE or the portions of the properties identified for land acquisition under the Proposed Action Alternative, planned demolition and construction activities have the potential to disturb hazardous materials. Lead and asbestos, heating oil from the ASTs, and any other solid and hazardous, or non-hazardous materials encountered during demolition activities would be managed in place and disposed of in accordance with state and federal regulations.

BMPs (Table 8) would be in place to minimize the release of building materials into the environment, and minimize the chance of a spill occurring, and any potential spill or leak would be addressed in accordance with applicable laws and regulations as soon as it is noticed. BMPs would include frequent removal of solid and hazardous materials to minimize any potential runoff. Hazardous materials would be properly stored, and an SPCC Plan would be implemented. The SPCC Plan would be prepared prior to construction.

During construction, the amount of solid waste generated would not be substantial and would be easily accommodated by existing waste disposal contractors. The disposal of universal waste would follow current standards and regulations. Therefore, demolition and construction under the Proposed Action Alternative may result in direct, temporary to long-term, negligible to minor, site-specific, adverse effects from accidental spills of hazardous materials, such as from construction vehicles or during the removal of existing fuel and other storage tanks.

During operation, direct and indirect, long-term, negligible to minor, local and site-specific, adverse impacts associated with hazardous materials and waste handling associated with use of paints and cleaners in facility maintenance activities would be anticipated. All hazardous materials would be stored, used, and disposed of in accordance with applicable federal, state, and

local regulations. Solid waste generation during normal operation of the LPOE would be similar to current levels.

No Action Alternative

A new Richford LPOE facility would not be constructed under the No Action Alternative. Routine repairs and maintenance of the existing facility would be conducted and the LPOE would operate under the existing conditions. There would be no change to the existing conditions in the NEPA study area and no solid waste or hazardous materials would be generated beyond current levels. Therefore, no impacts on solid waste and hazardous materials would occur.

3.11 Utilities

This section provides an overview of the existing utility infrastructure within the proposed project area and evaluates the potential impacts that demolition and construction of a modernized LPOE may have on these systems. The analysis includes water, electricity, and telecommunications services, and considers both temporary disruptions during construction and long-term implications for utility capacity and service capability.

3.11.1 Affected Environment

The Richford LPOE is served by municipal water services provided by the Town of Richford and electricity services provided by the Vermont Electric Co-op. The building is currently served by single-phase electrical service. Heating is provided via fuel from two 250-gallon fuel oil ASTs and five 100-gallon propane ASTs. The existing LPOE has an on-site sewage system (a septic tank). The site is not connected to a municipal sewage system. The LPOE is also served by internet and telecommunications services.

3.11.2 Environmental Consequences

Proposed Action Alternative

Under the Proposed Action Alternative, the demolition of the existing LPOE building would necessitate temporary disconnection of utilities such as water, electricity, and telecommunications. Demolition may expose old utilities that may contain hazardous materials, requiring careful handling. However, GSA would comply with applicable federal and state laws governing the use, generation, storage, transportation, and disposal of solid and hazardous materials, as described in Section 3.10. For the new LPOE building, existing utility systems may need to be relocated, upgraded, or expanded to accommodate the new demand of services. For example, the existing power supply to the site would be upgraded from single to three-phase for roughly 0.8 miles. The full extent of utility relocations and upgrades would be determined during final design. Rerouting the existing utility infrastructure and connections would be coordinated with utility providers. Additionally, advanced notice of any planned outages would be provided

to all adjacent property owners. The Proposed Action would not require connection to new utility services.

The Proposed Action would be consistent with the laws, executive orders, codes, regulations, and standards listed in the PBS Interim Core Building Standards (GSA 2025b). Design concepts that would be incorporated into the new Richford LPOE would include renewable and high energy efficiency systems that would be expected to reduce on-site waste and on-site stormwater. The building would include low embodied carbon materials, wrapped in a high-performance envelope, heated and cooled by a hybrid electric and geothermal heat pump system, with supplemental site-generated power from solar panels. Additionally, the Proposed Action would include an upgraded septic system to meet current and future operational needs.

Although there would be direct, temporary, minor, local adverse impacts to utilities, the new facility would be a sustainable design, with upgraded interior utilities, including mechanical, electrical, and plumbing, improving efficiency and reliability and resulting in direct, permanent, moderate, site-specific, beneficial impacts to utilities.

No Action Alternative

A new Richford LPOE facility would not be constructed under the No Action Alternative. Therefore, aging infrastructure would not be upgraded, which would lead to increased risk of service disruptions as outdated systems are more prone to failures, leaks, or breakdowns. Over time, this can cause inefficiencies, higher maintenance costs, and reduced reliability, affecting access to essential utilities such as water, electricity, or heating fuels and leading to potential safety hazards. Routine repairs and maintenance of the existing facility would be conducted and the LPOE would operate under the existing conditions. Therefore, the No Action Alternative would result in direct, long-term, minor, site-specific, adverse impacts.

3.12 Recreation

This section discusses the affected environment and environmental consequences that would result under each alternative for recreation, which is associated with the recreation resources, activities, and opportunities available in or accessible through an area.

3.12.1 Affected Environment

The area around the Richford LPOE is rich with recreational opportunities. Bicycling, kayaking, canoeing, cross-country skiing, snowmobiling, and hiking trails are abundant in the area, along with destinations for downhill skiing, camping, hunting, and fishing (Town of Richford 2024b).

The Missisquoi Valley Rail Trail's northeastern terminus is located 2.1 miles south of the Richford LPOE at 204 Troy Street in Richford, Vermont. The 26.4-mile trail stretches between Richford, Vermont, and St. Albans, Vermont, and is used by cyclists, walkers, runners, and horseback riders. Snowmobiles also use the trail in the winter, and it is groomed by local

snowmobile clubs (Missisquoi Valley Rail Trail 2023). Cyclists were observed crossing through the Richford LPOE during site visits, heading toward the Missisquoi Valley Rail Trail.

The Vermont Agency of Transportation (VTrans) is developing a Management Plan for the Missisquoi Valley Rail Trail that is expected to enhance recreation opportunities for trail users. The Missisquoi Valley Rail Trail Management Plan will identify approaches to support management, maintenance, community connections, and economic development opportunities along the trail (VTrans 2025a). In 2021, VTrans completed their Bicycle and Pedestrian Strategic Plan, which identified strategies to expand the inclusion of bicycling and walking throughout the agency's projects and activities. The Bicycle and Pedestrian Strategic Plan's vision and recommendations emphasize promoting walking and bicycling by improving safety, connectivity, and infrastructure throughout Vermont (VTrans 2021). These ongoing and recent plans are expected to improve the existing recreation opportunities in the region.

The Northern Forest Canoe Trail, a 700-mile water trail from Old Forge, New York, to Fort Kent, Maine, passes near the Richford LPOE where the Missisquoi River runs through Richford, Vermont. There are two access points to the Northern Forest Canoe Trail in Richford, each located approximately 1.6 miles from the Richford LPOE. While the Northern Forest Canoe Trail crosses the border at the East Richford LPOE, some users of the canoe trail may drive across the U.S.-Canada border at the Richford LPOE with their canoes or kayaks to put in at the access points in Richford. (Northern Forest Canoe Trail 2023, 2024).

The Richford LPOE is also located near popular hiking, camping, hunting, fishing, and downhill skiing destinations. Jay Peak Resort, which offers downhill skiing and snowboarding, along with golf, disc golf, an ice arena, and an indoor waterpark, is a 30-minute, 22-mile drive southeast from the Richford LPOE in Jay, Vermont (Jay Peak Resort 2024b). Mont Sutton, a resort offering skiing, snowboarding, and other activities, including mountain biking, disc golf, hiking, and ziplining, is a 25-minute, 13-mile drive from the Richford LPOE in Sutton, Quebec (Mont Sutton 2025). International users of both resorts can cross the border at the Richford, Pinnacle, East Richford, and North Troy LPOEs. The Long Trail, a 272-mile trail spanning the state of Vermont and connecting to the Appalachian Trail, has its northern terminus a 21-mile drive west of the Richford LPOE (Green Mountain Club 2024).

Additional recreational opportunities, including hiking, camping, snowmobiling, and cross-country skiing, abound in the area on both sides of the U.S.-Canada border. People seeking to recreate in the region on the U.S. and Canadian sides often cross the border at the Richford LPOE.

3.12.2 Environmental Consequences

Proposed Action Alternative

The Proposed Action Alternative would result in a temporary, approximately 24-month closure of the Richford LPOE during construction. During the closure, travelers would need to cross the border at either the Pinnacle LPOE, which is 3.3 miles west of the Richford LPOE, or the East Richford LPOE, which is 7 miles east of the Richford LPOE. There would be more traffic at the adjacent LPOEs during the closure of the Richford LPOE, which would increase wait times to cross the border. However, because the Pinnacle LPOE and the East Richford LPOE have shorter hours of operation (8:00 am – 4:00 pm) compared to the Richford LPOE (8:00 am – 8:00 pm), all cross-border traffic between the hours of 4:00 pm and 8:00 pm would need to use the West Berkshire LPOE, located approximately 11 miles from the Richford LPOE, potentially resulting in additional delays.

For people driving over the border to access recreational opportunities, the impacts of needing to cross at the adjacent LPOEs would likely add a minimal amount of time and distance to their trips, given the close proximity of the Pinnacle and East Richford LPOEs. However, the detour would be more time-intensive and impactful for cyclists who cross the border on their bicycles to access the Missisquoi Valley Rail Trail. Cyclists who are rerouted at the Richford LPOE would need to travel at least an additional 3.7 miles to reach the Pinnacle LPOE and may need to adjust travel plans because of the shorter operating hours at the Pinnacle LPOE.

Users of the Northern Forest Canoe Trail who drive across the border at the Richford LPOE to put in at one of the two access points in Richford would either need to cross the border at the East Richford, Pinnacle, or West Berkshire LPOE or choose a different access point along the trail during the construction period.

During the 24-month closure, there would be marked detour routes directing recreationists to the nearest LPOE to help people plan ahead and minimize impacts on people crossing the border while recreating or to access recreation opportunities (Table 8). Following the 24-month closure of the Richford LPOE during construction, the proposed improvements to the LPOE would increase inspection efficiency and improve traffic flow for people crossing the border, including those seeking recreational opportunities. This would lead to permanent benefits for people who travel from the United States to Canada or from Canada to the United States to recreate. Overall, the Proposed Action Alternative would result in direct and indirect, temporary, moderate, regional adverse impacts as well as direct and indirect, permanent, minor, regional beneficial impacts on recreation.

No Action Alternative

A new Richford LPOE facility would not be constructed under the No Action Alternative. Routine repairs and maintenance of the existing facility would be conducted and the LPOE

would operate under the existing conditions. There would be no changes in access to recreational opportunities, and no impacts on recreation would occur.

3.13 Resources Dismissed from Full Analysis in this Environmental Assessment

The following resources have been dismissed from full analysis in this EA.

3.13.1 Air Quality

The NEPA study area is located in an attainment area for all national ambient air quality standards. The proposed modernization of the Richford LPOE would result in temporary emissions of criteria pollutants through fugitive dust and exhaust from vehicles and equipment. Construction equipment would generate fugitive dust on disturbed soils, including during grading and filling activities. Fugitive dust would affect nearby residences and businesses during construction activities. Although fugitive dust from excavation and grading and construction vehicle exhaust would occur, these emissions would be short-term in duration, occurring only during portions of the two-year construction period, and would not be expected to affect the surrounding air quality in the long term. BMPs (see Section 5, Management and Mitigation Measures) would be implemented during construction to avoid or minimize any potential effects to air quality, including implementing dust control measures, covering open equipment when conveying or transporting soil, and turning off vehicles and equipment when not in use. Emissions during the construction period would be temporary and would not be anticipated to have a noticeable effect on air quality.

Operation of the proposed new facility would not result in increased emissions compared to existing conditions because traffic volume through the Richford LPOE is not expected to increase. Additionally, sustainable design concepts that would be incorporated into the new Richford LPOE would include renewable and high energy efficiency systems. Therefore, this resource was dismissed from detailed analysis.

3.13.2 Noise

The Proposed Action would result in temporary increases in noise levels associated with construction (e.g., clearing, demolition, and construction vehicle traffic) during daytime working hours. Noise-sensitive receptors in the immediate vicinity of the NEPA study area include four residences, a maple sugaring operation, and a farm. No schools or other public or private facilities are located in the vicinity of the NEPA study area.

Increased noise would be limited to the construction period, and noise levels would return to baseline conditions after construction is complete. Noise-related disturbances would be minimized by limiting construction to daytime hours, shutting down heavy equipment when not in use, and maintaining equipment per manufacturer recommendations to minimize noise generation.

The NEPA study area receives frequent noise disturbances under baseline conditions because it is located next to railroad tracks that receive daily railroad traffic. The Proposed Action would not noticeably alter the existing acoustic environment over the long term because traffic volume through the LPOE is not expected to increase. Therefore, this resource was dismissed from further analysis in this EA.

4.0 REASONABLY FORESEEABLE ACTIONS

To identify ongoing and reasonably foreseeable actions that could overlap with impacts from the Richford LPOE modernization and expansion project, GSA coordinated with VTrans and the Town of Richford and conducted a desktop analysis. GSA considered reasonably foreseeable actions within 5 miles of the Richford LPOE.

VTrans currently lists one ongoing project in the vicinity of the Richford LPOE (VTrans 2025b, c). The St. Albans-Richford Missisquoi Valley Rail Trail project consists of resurfacing the St. Albans-Richford segment of the trail with aggregate surface, clearing trees and brush along the trail, and constructing a trail extension into St. Albans. Only a minor portion of the VTrans project would occur within 5 miles of the Richford LPOE. The VTrans project is scheduled to begin in spring 2025 and is anticipated to be completed by winter 2025.

Two planned future VTrans projects were identified (VTrans 2025b, c). The Richford Missisquoi Valley Rail Trail project would construct a 0.5-mile extension of the trail into downtown Richford, approximately 1.5 miles south of the Richford LPOE. The project is anticipated to begin in spring 2026 and is anticipated to be completed by winter 2026. The second planned project consists of improvements at the Central Maine and Quebec Railroad crossing on Eastern Avenue in Richford. This project is scheduled to begin in spring 2027 and is anticipated to be completed by fall 2027.

The reasonably foreseeable actions described above are small in scope and would not be expected to contribute adverse impacts on resources potentially affected by the Proposed Action. Planned improvements at the Central Maine and Quebec Railroad crossing on Eastern Avenue have the potential to cause temporary localized delays for local traffic. However, this action would not be anticipated to affect potential detour routes associated with the temporary closure of the Richford LPOE under the Proposed Action because Eastern Avenue is a mostly residential dead-end side street off Vermont Route 139 that would not be suitable for potential detour routes.

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. Under the Proposed Action Alternative, GSA and its contractors would implement the BMPs listed in Table 8 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 8. Best Management Practices and Mitigation Measures

Resource	Mitigation Measures and Best Management Practices
Land Use	U.S. General Services Administration (GSA) would coordinate with landowners to maintain access to their properties during and after construction. 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 in accordance with the policies and provisions in the Uniform Act, as needed.
Geology and Soils	GSA would implement best management practices (BMPs) to minimize erosion and sedimentation, including temporary seeding, use of silt fencing and sediment traps, installing gravel construction entrances/exits, and other methods as determined during detailed design. GSA would revegetate areas temporarily cleared of vegetation with regionally appropriate native plant species.
Water Resources (Surface Waters and Wetlands)	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. GSA would obtain the required permits and would comply with the associated permit requirements. 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 Vermont Department of Environmental Conservation. GSA would implement a Spill Prevention, Control, and Countermeasure Plan (SPCC) to minimize the potential for adverse effects to groundwater.

Resource	Mitigation Measures and Best Management Practices
Wildlife and Habitat	The management and mitigation measures that GSA would implement 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 or spread of invasive species. If the monarch butterfly or any other new species that have the potential to occur in the action area become listed under the Endangered Species Act (ESA) prior to implementation, GSA would consult with the U.S. Fish and Wildlife Service, in accordance with Section 7 of the ESA, to identify measures to avoid, minimize, or mitigate impacts. However, GSA would minimize effects to the monarch butterfly 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 absence of nests in the proposed project area. GSA would implement other BMPs such as 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, to protect nests from construction-related disturbance.
Cultural Resources	GSA has initiated Section 106 consultation with the Vermont State Historic Preservation Office. Through the Section 106 consultation process, GSA will identify impacts on cultural resources and, if necessary, negotiate measures to avoid, minimize, or mitigate adverse effects.
Socioeconomics	The measures that GSA would implement for Land Use would also mitigate impacts to Socioeconomics.
Traffic, Transportation, and Parking	GSA would provide alternate routes by implementing traffic detours, using traffic management personnel, posting detour signage, and coordinating with local authorities for effective traffic flow management. Non-commercial traffic would be rerouted to the Pinnacle Land Port of Entry (LPOE) (3.3 miles west of the Richford LPOE) or the East Richford LPOE (7 miles east of the Richford LPOE). Commercial traffic would be rerouted to use the West Berkshire LPOE (11 miles west of the Richford LPOE).
Aesthetics (including Dark Skies)	GSA would incorporate design features to reduce light pollution and light trespass as reasonably achievable.
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 SPCC Plan, and the SPCC Plan would be implemented.
Utilities	GSA would require underground utilities to be located and marked prior to construction. GSA would coordinate all potential outages in advance with affected parties.
Recreation	The marked detour routes that GSA would implement for Traffic, Transportation, and Parking would apply to recreational users, directing them to the next nearest LPOE.

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