

**RECORD OF DECISION**  
**FINAL ENVIRONMENTAL IMPACT STATEMENT**  
**for the Kenneth G. Ward (Lynden) and Sumas Land Ports of Entry**  
**Modernization and Expansion Projects**  
**Lynden and Sumas, Washington**  
**Identification Number: EISX-023-00-010-1728643103**  
**December 2024**

**ACTION**

The U.S. General Services Administration (GSA) published a Final Environmental Impact Statement (EIS) for the Kenneth G. Ward (Lynden) and Sumas Land Ports of Entry (LPOE) modernization and expansion projects in Lynden and Sumas, Washington. GSA is the lead agency for the Final EIS. The Final EIS describes the purpose and need for the projects; the Proposed Action and alternatives considered; existing environment that could be affected; and potential environmental consequences resulting from each alternative.

In accordance with the Final EIS, GSA selects the following alternatives for the modernization and expansion of the Lynden and Sumas LPOEs:

- Lynden LPOE Alternative 3 (North-South Oriented LPOE Expansion).
- Sumas LPOE Alternative 4 (Multi-Story Construction LPOE Expansion).

This Record of Decision (ROD) documents the specific components and rationale for GSA’s decision. This decision is based on the Final EIS issued on November 15, 2024; associated technical reports; comments from federal and state agencies, stakeholders, members of the public, and elected officials; and other resources contained in the administrative record. The Final EIS is available on the GSA project websites at: [www.gsa.gov/lynden](http://www.gsa.gov/lynden) and [www.gsa.gov/sumas](http://www.gsa.gov/sumas). One comment from U.S. Environmental Protection Agency (USEPA), Region 10 was received during the Final EIS 30-day waiting period from November 15, 2024 to December 16, 2024. The USEPA indicated that GSA addressed all of the USEPA comments on the Draft EIS related to information on measures to protect water resources, improve air quality, and sustainable building design to adapt to a changing climate. The USEPA comment is provided in Attachment 1. No other comments were received during the Final EIS 30-day waiting period.

**BACKGROUND**

The Lynden LPOE is located at the end of Washington State Route (SR) 539 at the U.S. – Canada border. The Sumas LPOE is located on SR 9 in the city of Sumas, Washington which is approximately 10 miles east of the Lynden LPOE. The ports are operated by the U.S. Department of Homeland Security Customs and Border Protection (CBP) and are multi-modal facilities where CBP officers inspect commercially owned vehicles (COVs), privately owned vehicles (POVs), and pedestrians.

GSA aims to deliver the best customer experience in real estate, acquisition, and technology services to the government and the American people. GSA’s mission includes the design, construction, management, maintenance, custody, and control of federal buildings, including 122 of the 167 U.S. LPOEs. GSA’s Public Buildings Service (PBS) assists federal agency customers housed in GSA facilities with their current and future workplace needs based on their specific mission requirements. CBP’s mission is to safeguard America’s borders thereby protecting the public from dangerous people and materials while enhancing the nation’s global economic competitiveness by enabling legitimate trade and travel.

**PURPOSE AND NEED**

In 2021, Congress enacted the Infrastructure Investment and Jobs Act, also known as the Bipartisan Infrastructure Law, and included \$3.4 billion for GSA to undertake 26 construction and modernization projects at LPOEs nationwide. Many of the country's LPOEs, including the Lynden and Sumas LPOEs, are outdated, long overdue for modernization, operate at full capacity, and have surpassed the needs for which they were originally designed.

The purpose of these projects is for GSA to support the CBP mission through modernizing and expanding the Lynden and Sumas LPOEs. Accomplishing this purpose would increase the functionality, capacity, operational efficiency, effectiveness, security, sustainability, and safety of the Lynden and Sumas LPOEs.

The projects are generally needed to update the current facilities at the Lynden and Sumas LPOEs, which no longer function adequately and cannot meet CBP current operational needs or Program of Requirements. The existing Lynden and Sumas LPOEs have not undergone major improvements since their construction in the late 1980s and do not have sufficient space for modernization and expansion within their current layout. Additionally, the constrained layout limits CBP's ability to incorporate new technologies as they become available. More information on the specific need for each project is included below.

**Lynden LPOE Need**

The Lynden LPOE processes a limited amount of commercial truck traffic; however, the existing facilities are inadequate and have space limitations that can cause delays in processing times and congestion in the commercial lane. Therefore, the modernized and expanded Lynden LPOE is needed to:

- meet CBP operational needs;
- optimize operational and traffic flows;
- address facility deficiencies;
- improve customer service;
- provide a comfortable and safe working environment for port personnel; and
- permit CBP flexibility to install new technology as it becomes available.

**Sumas LPOE Need**

The existing Sumas LPOE does not have enough space for efficient traffic flows, which leads to congestion and delays. Commercial vehicles do not have sufficient room to maneuver in the port, particularly when undergoing secondary inspection or moving to the non-intrusive inspection (NII) building. These inefficiencies can cause increased processing time, impede incoming vehicles, and result in increased congestion. This congestion can lead to traffic that accumulates beyond the secure inspection areas at the LPOE, which impedes the port's operations and causes traffic and safety concerns in the surrounding urban area. This is both a concern for southbound traffic into the U.S. and northbound traffic to Canada. Currently southbound COVs queue on Railroad Avenue after they have passed primary inspection but have not yet been cleared to enter the U.S. The location where COVs queue on Railroad Avenue awaiting clearance is located outside of the LPOE property, which, therefore, creates security issues. Northbound traffic to Canada does not currently have a location within the Sumas LPOE in which to queue; therefore, during peak periods traffic queues on Cherry Street in the Sumas downtown. The queued traffic on Cherry Street can gridlock the downtown area of Sumas, especially during heavy traffic periods, causing difficulties for the local population attempting to access nearby businesses. There are scheduled northbound inspections of commercial and POV traffic that occur. The existing Sumas LPOE does not contain northbound inspection infrastructure; therefore, the inspections are conducted in a parking area along Sumas Avenue. This parking area is not visible from the main port area due to existing buildings creating a safety and security issue for inspection personnel. In addition, this area along Sumas Avenue east of the port is

technically outside of the port property creating a security issue. Additionally, the Main Building at the Sumas LPOE does not have adequate space to house the required POV, pedestrian, and commercial inspection and processing operations; and there are potential security vulnerabilities due to the current layout. Therefore, the need for the modernized and expanded Sumas LPOE would be the same as the Lynden LPOE as described above. An additional need for the Sumas LPOE expansion is to provide adequate space for both northbound and southbound vehicle queuing within the port property.

### **PROPOSED ACTION AND PROJECT ALTERNATIVES EVALUATED**

GSA prepared the Final EIS for the purpose of analyzing the potential environmental impacts resulting from the Proposed Action to modernize and expand the existing Lynden and Sumas LPOEs. The Final EIS was prepared in accordance with the National Environmental Policy Act (NEPA) (42 United States Code [U.S.C.] 4321 *et seq.*), GSA Order ADM 1095.1F (*Environmental Consideration in Decision Making*), GSA PBS *NEPA Desk Guide*, and other relevant laws, regulations, and Executive Orders (EOs), including the National Historic Preservation Act (NHPA).

The projects at the Lynden and Sumas LPOEs are analyzed jointly in the Final EIS due to their proximity (approximately 10 miles) to one another. Operational changes at one of the two LPOEs could have impacts on the other LPOE, especially during construction. For this reason, GSA decided it was important to analyze the two LPOEs together to ensure that impacts are fully considered.

#### **Proposed Action**

The Proposed Action is defined as the modernization and expansion of both the Lynden and Sumas LPOEs. All action alternatives would include:

- potential land acquisition adjacent to the LPOEs;
- site preparation, including demolition and disposal of existing LPOE structures, grading, and filling;
- construction and operation of a new Main Building and other support facilities;
- addition of enclosed inspection spaces for COVs and POVs;
- enhanced accessibility; and
- improved lighting, which would be designed to minimize light pollution.

The Lynden and Sumas LPOE's proposed configurations have not been established and design considerations are ongoing. All facility and infrastructure improvements proposed under the action alternatives would be designed in accordance with applicable LPOE design standards and would incorporate a sustainable, climate-resilient, cyber-secure, and operationally efficient design. GSA would seek to meet or exceed energy and sustainability goals established by federal guidelines and policies, along with industry standard building codes and best practices. Project elements may include, but are not limited to:

- implementation of GSA's *Facilities Standards for the Public Buildings Service* (P100 Standards) and associated 2022 Addendum in facilities design, which establishes GSA's mandatory standards and criteria for GSA-owned facilities;
- mandatory standards for energy and sustainable design, historic preservation, accessibility, and other codes and standards;
- Diversion of at least 50 percent of nonhazardous construction and demolition waste from a landfill per Section 207 of EO 14057, *Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability*; and
- Consideration of renewable energy sources. GSA is evaluating the use of renewable energy technologies, which would be determined during design.

- Achieving Gold-level certification under the Leadership in Energy and Environmental Design (LEED®) green building rating system and Sustainable Sites Initiative (SITES) silver certification standards per P100 requirements.
- Compliance with the Energy Independence and Security Act (EISA) of 2007.

GSA considered two action alternatives for the Lynden LPOE and three action alternatives for the Sumas LPOE. GSA also analyzed the No Action Alternative for each LPOE, which evaluates the effects that would occur if GSA continued to operate both LPOEs under current conditions (i.e., status quo). For both the Lynden and Sumas LPOEs, the No Action Alternative was evaluated as Alternative 1. The action alternatives GSA considered are detailed in Section 2.3 of the Final EIS and are summarized below.

### **Lynden LPOE Action Alternatives Considered**

#### ***Lynden LPOE Alternative 2 – East-West Oriented LPOE Expansion***

Lynden LPOE Alternative 2 would modernize and expand the LPOE to a capacity that would allow the port to meet its current and planned future operational needs. LPOE modernization and expansion would include potential land acquisition, site preparation (full or partial demolition, grading and filling, rock excavation), and construction. GSA may fully demolish all structures, foundations, and utilities in the project area, or they may reuse existing foundations and utilities. The extent of demolition activities would be determined during design. The maximum proposed limits of disturbance for Lynden LPOE Alternative 2 would be approximately 14.5 acres.

A majority of the modernization and expansion construction activities, including staging activities, would take place within the maximum proposed limits of disturbance. The expansion to the west would primarily support new commercial operations, while the parcel to the east of Guide Meridian Road would support reconfigured northbound traffic and outbound inspection requirements.

Facility functions may be consolidated or expanded pending final design. Construction activities such as connecting to existing utilities and repairing roadway and shoulder pavement may occur outside the maximum proposed limits of disturbance. The extent of this construction activity would be determined during design. The roadway pavements and shoulders within these utility connection areas would not be subject to the project's potential land acquisition. GSA would coordinate with various stakeholders, including the Washington State Department of Transportation (WSDOT), local municipalities, and associated utility providers regarding these connections and any service outages prior to commencing construction activities.

Under Lynden LPOE Alternative 2, the new Main Building would provide an established clear line-of-sight in both the north and south directions. The larger Main Building would provide additional interior building space to better support port operational requirements and employees. A smaller building to be constructed on the east side of Guide Meridian Road would support the port's outbound commercial inspection requirements. In addition, parking and other paved surfaces would support expanded visitor (POV, bus, and pedestrian travelers), employee, and commercial vehicle parking requirements. Inspection lanes and facilities would be modernized and expanded, to include new fully operational commercial capabilities, and upgraded to handle traffic flows and improve operational efficiency.

Operations at the Lynden LPOE would be comparable to existing conditions but would be more efficient. Ongoing maintenance would be required for newly constructed facilities. The number of employees present onsite varies during peak and off-peak hours. Based on funding and resource availability, CBP may increase the current staff at the Lynden LPOE by approximately 20 personnel after the modernization and expansion project is completed.

***Lynden LPOE Alternative 3 – North-South Oriented LPOE Expansion***

Lynden LPOE Alternative 3 would include the same action as Lynden LPOE Alternative 2, with the one noted difference being the orientation of the LPOE alignment. Under Lynden LPOE Alternative 3, the new layout would be oriented north-south and located to the west and south of the existing port. This orientation option would facilitate more efficient commercial traffic flow (being in line or parallel to the proposed north-south oriented non-commercial flow) and would also generally mimic the port's existing north-south traffic flow. All other proposed work under Lynden LPOE Alternative 3, including potential development of the parcel on the east side of Guide Meridian Road, along with the other site preparation and construction, proposed number of buildings, inspection lanes, and phasing, would be the same as Lynden LPOE Alternative 2. The maximum proposed limits of disturbance for Lynden LPOE Alternative 3 would be approximately 10.3 acres.

**Sumas LPOE Action Alternatives Considered*****Sumas LPOE Alternative 2 – Feasibility Study Preferred Alternative***

Sumas LPOE Alternative 2 would modernize and expand the LPOE to a capacity that would allow the port to meet its current and future operational needs. LPOE modernization and expansion would include potential land acquisition, site preparation (full or partial demolition, grading and filling, rock excavation, and paving), and construction. GSA may fully demolish all structures, foundations, and utilities in the project area, or they may reuse existing foundations and utilities. The extent of demolition activities would be determined during design. The maximum proposed limits of disturbance for Sumas LPOE Alternative 2 would be approximately 12.6 acres. Sumas LPOE Alternative 2 would have an orientation or layout of the commercial inspection facility, including loading docks, adjoining the Main Building toward the eastern side of the LPOE. All construction activities, including staging activities, would take place within the maximum proposed limits of disturbance. Expansion to the west is not possible due to the existing BNSF railway located immediately west of the existing port. The expansion would support expanded inbound (southbound) and outbound (northbound) commercial and non-commercial operations, and significantly improve pedestrian traffic safety while traversing the port to and from the U.S.

The LPOE would include a dedicated lane for the CBP NEXUS program. The NEXUS program allows pre-screened travelers expedited processing when entering the U.S. and Canada. With the exception of the NEXUS lane, all inbound POV and outbound POV lanes would be reversible as needed for seasonal traffic patterns.

Facility functions may be consolidated or expanded pending final design. Construction activities such as connecting to existing utilities and repairing roadway and shoulder pavement may occur outside the maximum proposed limits of disturbance. The extent of this construction activity would be determined during design. The roadway pavements and shoulders within these utility connection areas would not be subject to the project's potential land acquisition. GSA would coordinate with various stakeholders, including the WSDOT, local municipalities, and associated utility providers regarding these connections and any service outages prior to commencing construction activities.

Under Sumas LPOE Alternative 2, a new Main Building, complete with an adjoining commercial inspection facility, would provide an established clear line-of-sight in both the north and south directions. The new Main Building would support port operations. The larger Main Building would also provide additional interior building space to better support port operational requirements and employees. A separate smaller building would support the port's outbound commercial inspection requirements. In addition, parking and other paved surfaces would support expanded employee, visitor (POV, bus, and pedestrian travelers), and commercial vehicle parking requirements, and would provide enhanced safety for pedestrian visitors. Inspection lanes and facilities would be expanded and upgraded to handle traffic flows and improve operational efficiency.

Operations at the Sumas LPOE would be comparable to existing conditions but would be more efficient. Ongoing maintenance would be required for newly constructed facilities. The number of employees present onsite varies during peak and off-peak hours. Based on funding and resource availability, CBP may increase the current staff at the Sumas LPOE by approximately 26 personnel after the modernization and expansion project is completed.

### ***Sumas LPOE Alternative 3 – Commercial Inspection West***

Sumas LPOE Alternative 3 would include the same action as Sumas LPOE Alternative 2, with the one noted difference being the orientation of the commercial inspection facility adjoining the proposed Main Building. Under Sumas LPOE Alternative 3, the maximum proposed limits of disturbance would be approximately 12.6 acres; however, the orientation or layout of the commercial inspection facility, including loading docks, adjoining the Main Building, would be “flipped” to the western side of the LPOE compared to Sumas LPOE Alternative 2. The Sumas LPOE Alternative 3 layout proposes to have the commercial hard secondary loading dock/garage area located on the building’s west side, compared to Sumas LPOE Alternative 2 where this area would be located on the east side. This alternative configuration would facilitate a slight adjustment of commercial and non-commercial support facilities, resulting in a potentially smaller overall building footprint. This orientation option, compared to Sumas LPOE Alternative 2, would also potentially facilitate more efficient commercial traffic flow, particularly for any agricultural/livestock vehicles requiring U.S. Department of Agriculture (USDA) inspection at the port. All other proposed work under Sumas LPOE Alternative 3, including potential land acquisition and development of the port’s east side area in support of outbound commercial inspections, along with the other site preparation and construction, proposed number of buildings, inspection lanes, and phasing, would be the same as Sumas LPOE Alternative 2.

### ***Sumas LPOE Alternative 4 – Multi-Story Construction LPOE Expansion***

Sumas LPOE Alternative 4 would include the same action as Sumas LPOE Alternatives 2 or 3; however, GSA would construct a multi-story Main Building. Operational space within the Main Building would be consolidated on multiple levels, minimizing the overall building footprint. Sumas LPOE Alternative 4 would also potentially include an employee pedestrian bridge to be constructed across Cherry Street, linking the east side parking and commercial outbound inspection facility with the west side’s Main Building and adjoining commercial inspection facility, further increasing employee safety as they traverse the port. Under Sumas LPOE Alternative 4, the maximum proposed limits of disturbance would be approximately 12.6 acres. All other proposed work under Sumas LPOE Alternative 4, including development of the port’s east side area in support of outbound commercial inspections, along with the other site preparation and construction, proposed number of buildings, inspection lanes, and phasing, would be similar to Sumas LPOE Alternatives 2 and 3.

### **Construction Sequencing Options**

GSA and CBP considered two construction sequencing options for detailed analysis in the Final EIS: Concurrent Construction Option and Sequential Construction Option. The construction sequencing options are independent of the action alternatives that are under consideration and could be implemented under any combination of selected action alternatives at the two ports. Both options would require coordination of construction activities within the ports as they are constructed. Construction sequencing options are still being evaluated and will be determined during the design-build phase.

As detailed in Section 2.3.4.1 of the Final EIS, both ports would remain open during construction under the Concurrent Construction Option. Pedestrian and POV access would be maintained through the ports but limits on the number of open processing lanes and shifting of POVs to COV lanes for limited times may be necessary. COVs may be detoured at times to other ports to permit adequate space for continued POV processing. Under the Sequential Construction Option, all traffic, pedestrians, POVs, and COVs would be detoured from the Lynden LPOE during the majority of its construction. Once the Lynden LPOE has

reopened, construction that impacts traffic would begin on the Sumas LPOE. The Sumas LPOE would remain open to pedestrians and POVs during construction to the greatest extent possible. COVs would be detoured from the Sumas LPOE to other LPOEs during portions of the construction period.

### **Environmental Consequences**

The Final EIS evaluated the potential impact on the environmental conditions from implementing the Proposed Action and alternatives including the No Action Alternative for both the Lynden LPOE and Sumas LPOE projects. Resources analyzed in the Final EIS included land use; water resources; biological resources; geology, topography, and soils; air quality, climate change, and greenhouse gases; human health and safety; infrastructure and utilities; traffic and transportation; noise and vibration; socioeconomics; and environmental justice and protection of children's health and safety. For each resource area analyzed in the Final EIS, the expected environmental consequences of the alternatives are summarized in Tables 1 and 2.

GSA identified potential past, present, and reasonably foreseeable future actions that could result in cumulative impacts when combined with the Lynden and Sumas LPOE modernization and expansion projects, as detailed in Chapter 4 of the Final EIS. The planned Sumas Avenue reconstruction project, which would be located south of the Sumas LPOE, was identified as a project with the potential to contribute a cumulative impact to local surface waters due to increased runoff from potentially increased impervious surface area. The Sumas LPOE project and the Sumas Avenue reconstruction project would both incorporate measures to minimize surface water impacts from increased impervious areas and would therefore only have the potential for negligible, long-term, local, cumulative impacts.

### **Mitigation Measures and Best Management Practices**

Under Lynden LPOE Alternative 3 and Sumas LPOE Alternative 4, GSA commits to implementing the impact reduction measures and best management practices (BMPs) specified in Table 3 to the greatest extent possible.

**Table 1. Summary Comparison of Potential Effects of Alternatives – Lynden LPOE**

Lynden LPOE Alternative 1 No Action Alternative	Lynden LPOE Alternative 2 East-West Orientation LPOE Expansion	Lynden LPOE Alternative 3 North-South Orientation LPOE Expansion
<i>Land Use</i>		
<p>No changes in land use would occur. Current facilities and infrastructure at the existing LPOE would remain unchanged. In addition, no ground or subsurface disturbance or demolition and construction activities would occur, and land acquisition would not be needed.</p>	<p><b>Construction:</b> Direct, long-term, minor, local, adverse impacts on land use, due to demolition and replacement of existing facilities. Additionally, GSA would need to acquire approximately 9.8 acres of land that currently includes farmland and a commercial business (with associated parking lot) that would be converted into buildings, paved surfaces, and landscaped areas.</p> <p><b>Operation:</b> Direct, long-term, minor, regional, beneficial impacts on land use due to increased efficiency and improved traffic flow and safety to and from the LPOE.</p>	<p><b>Construction:</b> Direct, long-term, moderate, local, adverse impacts on land use, due to demolition and replacement of existing facilities. Additionally, GSA would need to acquire approximately 5.6 acres of land that currently includes farmland commercial facilities, a commercial business (with associated parking lot), and a residence, that would be converted into buildings, paved surfaces, and landscaped areas.</p> <p><b>Operation:</b> Direct, long-term, minor, regional, beneficial impacts on land use due to increased efficiency and improved traffic flow and safety to and from the LPOE.</p>
<i>Water Resources</i>		
<p>No ground or subsurface disturbance from new facility or infrastructure construction would occur; therefore, there would be no adverse impact to water resources.</p>	<p><b>Construction:</b> Indirect, short-term, negligible, local and regional, adverse impacts to adjacent surface waters due to the potential for increased erosion, sedimentation, and pollutants to receiving waters associated with up to approximately 14.5 acres of ground disturbance. Indirect, short-term, minor, site-specific and local, adverse impacts to groundwater depending on groundwater depth-to-water due to the potential for ground-disturbing activities (including installation of a geothermal energy system) to affect groundwater flow or further degrade existing groundwater quality. No surface waters, wetlands, or floodplains occur within the project area.</p> <p><b>Operation:</b> Indirect, long-term, negligible, local and regional, adverse impacts to adjacent surface waters due to an increase in impervious surfaces resulting in increased stormwater runoff volumes. This alternative could add up to 9.5 acres of new impervious area within the project area. Adverse impacts to groundwater would not be expected during operations.</p>	<p><b>Construction:</b> Indirect, short-term, negligible, local and regional, adverse impacts to adjacent surface waters due to the potential for increased erosion, sedimentation, and pollutants to receiving waters associated with up to approximately 10.3 acres of ground disturbance. Indirect, short-term, minor, site-specific and local, adverse impacts to groundwater depending on groundwater depth-to-water due to the potential for ground-disturbing activities (including installation of a geothermal energy system) to affect groundwater flow or further degrade existing groundwater quality. No surface waters, wetlands, or floodplains occur within the project area.</p> <p><b>Operation:</b> Indirect, long-term, negligible, local and regional, adverse impacts to adjacent surface waters due to an increase in impervious surfaces resulting in increased stormwater runoff volumes. This alternative could add up to 3.5 acres of new impervious area within the project area. Adverse impacts to groundwater would not be expected during operations.</p>



LYNDEN AND SUMAS, WA LPOE MODERNIZATION AND EXPANSION PROJECTS  
 RECORD OF DECISION

**Table 1. Summary Comparison of Potential Effects of Alternatives – Lynden LPOE**

Lynden LPOE Alternative 1 No Action Alternative	Lynden LPOE Alternative 2 East-West Orientation LPOE Expansion	Lynden LPOE Alternative 3 North-South Orientation LPOE Expansion
<i>Biological Resources</i>		
<p>No ground disturbance from new facility or infrastructure construction would occur; therefore, there would be no adverse impacts on existing biological resources.</p>	<p><b>Construction:</b> Direct, short-term, minor, site-specific, adverse impacts associated with removal of vegetation during demolition and construction activities. Direct and indirect, short-term, minor, local, adverse impacts on wildlife due to temporary habitat disruption and increases in noise and human activity. With implementation of impact avoidance measures, this alternative may affect but would not likely adversely affect federally and state-protected species.</p> <p><b>Operation:</b> No additional adverse impacts to vegetation or wildlife would be expected.</p>	<p>Impacts under Lynden LPOE Alternative 3 would be the same as those for Alternative 2.</p>
<i>Geology, Topography, and Soils</i>		
<p>No ground or subsurface disturbance from new facility or infrastructure construction would occur; therefore, there would be no adverse impacts on existing geology, topography, and soils.</p>	<p><b>Construction:</b> Direct, short- and long-term, minor, site-specific, adverse impacts on geology and soils during demolition, clearing, and excavation for construction of new buildings and infrastructure, including a geothermal energy system, if implemented. Total maximum disturbance of approximately 14.5 acres. Direct, long-term, minor, site-specific, adverse impacts on topography due to vegetation removal and site grading, as required. Under this alternative, the western portion of the project area would need to be raised using large amounts of fill.</p> <p><b>Operation:</b> Direct, long-term, minor, site-specific, adverse impacts on soils due to an increase in impervious surfaces (up to 9.5 acres of new impervious area within the project area). No additional adverse impacts to geology or topography would be expected.</p>	<p><b>Construction:</b> Direct, short- and long-term, minor, site-specific, adverse impacts on geology and soils during demolition, clearing, and excavation for construction of new buildings and infrastructure, if implemented. Total maximum disturbance of approximately 10.3 acres. Direct, long-term, minor, site-specific, adverse impacts on topography due to vegetation removal and site grading, as required. This alternative would require substantially less fill material than required under Lynden LPOE Alternative 2.</p> <p><b>Operation:</b> Direct, long-term, minor, site-specific, adverse impacts on soils due to an increase in impervious surfaces (up to 3.5 acres of new impervious area within the project area). No additional adverse impacts to geology or topography would be expected.</p>

**Table 1. Summary Comparison of Potential Effects of Alternatives – Lynden LPOE**

Lynden LPOE Alternative 1 No Action Alternative	Lynden LPOE Alternative 2 East-West Orientation LPOE Expansion	Lynden LPOE Alternative 3 North-South Orientation LPOE Expansion
<b><i>Air Quality, Climate Change, and Greenhouse Gases</i></b>		
<p>No construction or changes to onsite operations would occur; therefore, there would be no changes to air quality and GHG emissions.</p>	<p><b>Construction:</b> Direct, short-term, minor, regional, adverse impacts on air quality from construction emissions. Construction activities would comply with all applicable federal, state, and local regulations relating to air quality, including any permitting and registration requirements. Direct, short-term, negligible, regional, adverse impact to GHG emissions and global climate change primarily from use of fuel in construction equipment, worker vehicles, and delivery and refuse trucks.</p> <p><b>Operation:</b> Direct and indirect, long-term, negligible to minor, regional, adverse impacts on air quality due to a likely increase in energy demand at the modernized and expanded LPOE. Reductions in wait times for POVs could lower vehicle idling emissions, partially offsetting anticipated increases. Direct, long-term, negligible, regional, adverse impact to GHG emissions and climate change due to a likely increase in energy demand and number of employees commuting to the LPOE. Reductions in wait times for POVs could lower vehicle idling emissions, partially offsetting this increase.</p>	<p>Impacts under Lynden LPOE Alternative 3 would be the same as those for Alternative 2.</p>
<b><i>Human Health and Safety</i></b>		
<p>Current facilities and infrastructure at the existing LPOE would remain unchanged; therefore, negligible adverse impacts would continue, associated with ongoing maintenance, which would require negligible amounts of hazardous materials usage and generate negligible amounts of hazardous waste, in addition to potential risks to human health and safety associated with existing conditions and current operations.</p>	<p><b>Construction:</b> Direct, short-term, minor, site-specific, adverse impacts to the health and safety of construction workers, due to the risks inherent in construction activities. Direct and indirect, short-term, negligible to minor, local, adverse impacts from hazardous materials use and waste handling due to the potential increase in such materials/wastes during demolition and construction activities, and the potential to encounter contaminated soil during excavation activities (removal of contaminated soil would represent a direct, long-term, moderate, local, beneficial impact to human health and safety). Construction would not cause demand or create hazardous conditions that would exceed the capacities of existing fire protection and emergency services.</p>	<p><b>Construction:</b> Direct and indirect, short-term, negligible to minor, site-specific and local, adverse impacts to health and safety would be the same as under Lynden LPOE Alternative 2 Likewise, removal of contaminated soil would represent a direct, long-term, moderate, local, beneficial impact to human health and safety.</p> <p><b>Operation:</b> Direct and indirect, long-term, minor to moderate, local, beneficial impacts on human health and safety would be the same as under Lynden LPOE Alternative 2. Direct and indirect, long-term, negligible to minor, local, adverse impacts could occur, as described under Lynden LPOE Alternative 2.</p>

**Table 1. Summary Comparison of Potential Effects of Alternatives – Lynden LPOE**

Lynden LPOE Alternative 1 No Action Alternative	Lynden LPOE Alternative 2 East-West Orientation LPOE Expansion	Lynden LPOE Alternative 3 North-South Orientation LPOE Expansion
	<p><b>Operation:</b> Direct and indirect, long-term, minor to moderate, local, beneficial impacts on human health and safety, as the expanded and modernized LPOE would be compliant with applicable building and safety codes, and updated configurations would improve traffic patterns and minimize the risk of accidents. Direct, long-term, negligible to minor, adverse impacts could occur, as new facilities would be located above a site of known groundwater contamination. Risk to facility occupants would be mitigated through the installation of vapor barriers beneath the building foundation, and continued groundwater monitoring and remediation with Department of Ecology oversight. Negligible to minor adverse impacts could also result from radiation emissions from inspection equipment, although operations would be conducted in accordance with all applicable standards and codes. Direct and indirect, long-term, negligible to minor, local, adverse impacts associated with hazardous materials and waste handling, due to the potential storage of petroleum and use of paints and cleaners in facility maintenance activities. All hazardous materials would be managed in accordance with applicable federal, state, and local regulations. If implemented, closed loop geothermal systems would use antifreeze, propylene glycol, or ethanol solution as a heat exchange fluid; however, regular maintenance would minimize any potential for leaks.</p>	
<b>Infrastructure and Utilities</b>		
<p>Current facilities and infrastructure at the existing LPOE would remain. The LPOE would not benefit from updated facilities and infrastructure with LEED® certification that would be designed to accommodate renewable energy sources and achieve sustainable standards.</p>	<p><b>Construction:</b> Direct, short-term, minor, site-specific, adverse impacts while existing infrastructure is demolished, and new facilities are constructed. Direct, short-term, local, negligible, adverse impacts locally due to increased demand on public utilities. Direct, short-term, minor, site-specific, adverse impacts on utility services as utility relocation and reconnection is required, due to the potential for temporary, intermittent shut offs. Construction of new utilizes would be conducted in accordance with applicable local and state regulations.</p>	<p><b>Construction:</b> Direct, short-term, minor, site-specific, adverse impacts while existing infrastructure is demolished, and new facilities are constructed. Impacts under this alternative would be higher than under Lynden LPOE Alternative 2 due to the presence of additional infrastructure in the proposed expansion area that would be demolished. Direct, short-term, negligible, adverse impacts locally due to increased demand on public utilities. Direct, short-term, minor, site-specific, adverse impacts on utility services as utility relocation and reconnection is required, due to the potential for temporary, intermittent shut offs. Construction of new</p>

**Table 1. Summary Comparison of Potential Effects of Alternatives – Lynden LPOE**

Lynden LPOE Alternative 1 No Action Alternative	Lynden LPOE Alternative 2 East-West Orientation LPOE Expansion	Lynden LPOE Alternative 3 North-South Orientation LPOE Expansion
	<p><b>Operation:</b> Direct, long-term, major, site-specific, beneficial impacts on infrastructure, as newly constructed facilities would comply with applicable GSA standards, building codes, and P100 standards, new construction is intended to meet LEED® Gold and SITES silver certification, and would support updated operational needs for CBP. New facilities, updated layout, improved inspection lanes, and updated parking lot design would improve the efficiency of processing pedestrians, COVs, and POVs, and would relieve traffic congestion. Direct, long-term, major, site-specific, beneficial impacts on utilities, due to proposed upgrades and/or replacement with more modernized systems. Direct, long-term, negligible, local, adverse impacts to public electricity and telecommunication utilities would result due to increased demand; however, much of this demand would be offset by a more efficient, sustainable facility design.</p>	<p>utilizes would be conducted in accordance with applicable local and state regulations.</p> <p><b>Operation:</b> Direct, long-term, major, site-specific, beneficial impacts on infrastructure, as newly constructed facilities would comply with applicable GSA standards, building codes, and P100 standards, new construction is intended to meet LEED® Gold and SITES silver certification, and would support updated operational needs for CBP. New facilities, updated layout, improved inspection lanes, and updated parking lot design would improve the efficiency of processing pedestrians, COVs, and POVs, and would relieve traffic congestion. Direct, long-term, major, site-specific, beneficial impacts on utilities, due to proposed upgrades and/or replacement with more modernized systems. Direct, long-term, negligible, local, adverse impacts to public electricity and telecommunication utilities would result due to increased demand; however, much of this demand would be offset by a more efficient, sustainable facility design.</p>
<b>Traffic and Transportation</b>		
<p>Under this alternative, existing issues related to traffic congestion (and related safety and security issues) would remain unchanged.</p>	<p><b>Construction:</b> Short-term, negligible to minor, adverse traffic impacts due to an increase in workers commuting to the site (approximately 10 to 15 workers per day for much of construction, with a peak of 50 to 70 workers). Under the Concurrent Construction Option, it is likely that some traffic would divert temporarily to other nearby ports. Under the Sequential Option, the Lynden LPOE would be closed during construction, requiring all traffic from the port to use an alternative location.</p> <p><b>Operation:</b> Direct, long-term, local, beneficial impacts on safety, security, and congestion at the LPOE due to improved traffic configurations. No long-term impact on traffic volumes would occur.</p>	<p>Impacts under Lynden LPOE Alternative 3 would be the same as those for Alternative 2.</p>

**Table 1. Summary Comparison of Potential Effects of Alternatives – Lynden LPOE**

Lynden LPOE Alternative 1 No Action Alternative	Lynden LPOE Alternative 2 East-West Orientation LPOE Expansion	Lynden LPOE Alternative 3 North-South Orientation LPOE Expansion
<i>Noise and Vibration</i>		
<p>No construction or changes to onsite operations would occur; therefore, there would be no new increases in noise levels or adverse impacts to the noise environment and associated vibration.</p>	<p><b>Construction:</b> Direct, short-term, minor, local, adverse noise impacts associated with construction activities. A conservative estimate assumes that noise levels would be approximately 90 dBA at 50 feet away. The closest residence likely to be present during construction is approximately 440 feet from areas where construction activities would occur. At this distance, outdoor noise levels would be approximately 73 dBA if all equipment were operating simultaneously; indoor noise levels would be approximately 54 dBA (with windows shut). These levels are below thresholds considered harmful by the USEPA and WHO. Increased traffic could also contribute to temporary, intermittent increases in noise, resulting in direct, short-term, minor, adverse noise impacts along primary transportation corridors. Regarding vibration, PPV levels do not reach the level at which structural damage could occur to non-historic structures (0.3 inches per second) or the threshold that could result in human annoyance (0.2 inches per second). Therefore, no adverse vibration impacts would occur.</p> <p><b>Operation:</b> No additional adverse impacts on noise levels or vibration would be expected.</p>	<p>Impacts under Lynden LPOE Alternative 3 would be the same as those for Alternative 2.</p>
<i>Socioeconomics</i>		
<p>No new facility or infrastructure construction would occur; therefore, there would be no impacts on existing population and housing, labor and income, the local economy, and public services within the Lynden CCD.</p>	<p><b>Construction:</b> Direct, short- to long-term, minor to moderate, local and regional, adverse impacts due to proposed land acquisition, which would impact a private farm and displace the duty-free store. GSA would provide relocation assistance for applicable stakeholders in accordance with the Uniform Act. Direct, short-term, minor, local and regional, adverse impacts to housing could result due to an influx of construction workers placing temporary, increased demand on local housing. Lodging opportunities are somewhat limited in the project area; however, 78 hotels are located within 25 miles of the Lynden LPOE.</p> <p>Under the Concurrent Construction Option, direct and indirect, short-term, minor to moderate, adverse local</p>	<p><b>Construction:</b> Direct, short- to long-term, minor to moderate, local and regional, adverse impacts similar to those discussed under Lynden LPOE Alternative 2. Land acquisition under this alternative would impact a private farm, including a residence. GSA would provide relocation assistance for applicable stakeholders in accordance with the Uniform Act. Direct, short-term, minor, local and regional, adverse impacts to housing could result, as described under Lynden LPOE Alternative 2.</p> <p>Under the Concurrent Construction Option, direct and indirect, short-term, minor to moderate, adverse local socioeconomics impacts may result as commercial traffic is redirected to other ports in the region. If travelers</p>

LYNDEN AND SUMAS, WA LPOE MODERNIZATION AND EXPANSION PROJECTS  
 RECORD OF DECISION

**Table 1. Summary Comparison of Potential Effects of Alternatives – Lynden LPOE**

Lynden LPOE Alternative 1 No Action Alternative	Lynden LPOE Alternative 2 East-West Orientation LPOE Expansion	Lynden LPOE Alternative 3 North-South Orientation LPOE Expansion
	<p>socioeconomics impacts may result as commercial traffic is redirected to other ports in the region. If travelers choose to reroute to other LPOEs, there could be indirect, short-term, negligible to minor, local, adverse impact on the Lynden economy. Under the Sequential Construction Option, the Lynden LPOE would be completely closed until construction is complete, which may result in direct and indirect, short-term, negligible to minor, local, adverse impacts as travelers utilize other LPOEs.</p> <p><b>Operation:</b> Direct, long-term, negligible to minor, local, beneficial impacts on population, labor, and earnings would result from increased staffing at the expanded and modernized LPOE (anticipated increase of 20 full-time employees to the current staff of 36). Any employee increase would result in a direct, long-term, minor, local, adverse impact on available housing. Additional personnel with school-age children could result in a direct, long-term, negligible, adverse impact on the local school system. Reduced traffic times at the expanded and modernized LPOE would have direct, long-term, minor to moderate, local, beneficial impacts on personal travel expenditures, resulting in indirect, long-term, minor to moderate, beneficial economic impacts to the Lynden CCD. Shorter wait times for tourists could result in direct and indirect, long-term, minor to moderate, local, beneficial impacts on earnings and employment within the Lynden CCD if tourists increase spending in the area. Direct and indirect, long-term, minor, local, beneficial impacts to community services due to improved roadway safety.</p>	<p>choose to reroute to other LPOEs, there could be indirect, short-term, negligible to minor, local, adverse impact on the Lynden economy. Under the Sequential Construction Option, the Lynden LPOE would be completely closed until construction is complete, which may result in direct and indirect, short-term, negligible to minor, local, adverse impacts as travelers utilize other LPOEs.</p> <p><b>Operation:</b> Impacts would be the same as under Lynden LPOE Alternative 2.</p>

LYNDEN AND SUMAS, WA LPOE MODERNIZATION AND EXPANSION PROJECTS  
 RECORD OF DECISION

**Table 1. Summary Comparison of Potential Effects of Alternatives – Lynden LPOE**

Lynden LPOE Alternative 1 No Action Alternative 1	Lynden LPOE Alternative 2 East-West Orientation LPOE Expansion	Lynden LPOE Alternative 3 North-South Orientation LPOE Expansion
<b><i>Environmental Justice and Protection of Children’s Health and Safety</i></b>		
Current facilities and infrastructure at the existing LPOE would remain; therefore, there would be no change in conditions related to minority and low-income populations or children’s health and safety.	No environmental justice communities are located within a 1-mile radius of the Lynden LPOE project area; therefore, no adverse impacts to these communities would occur during construction or operation. Additionally, there are no areas within 1 mile of the maximum proposed limits of disturbance that children may regularly visit; therefore, no adverse impacts on children’s health and safety would occur.	Impacts under Lynden LPOE Alternative 3 would be the same as those for Alternative 2.

CBP = U.S. Customs and Border Protection  
 CCD = census county division  
 COV = commercially owned vehicle  
 dBA = decibels on an A-weighted scale

GHG = greenhouse gas  
 GSA = U.S. General Services Administration  
 LEED® = Leadership in Energy and Environmental Design  
 LPOE = Land Port of Entry

POV = privately owned vehicle  
 PPV = peak particle velocity  
 USEPA = United States Environmental Protection Agency  
 WHO = World Health Organization

LYNDEN AND SUMAS, WA LPOE MODERNIZATION AND EXPANSION PROJECTS  
 RECORD OF DECISION

**Table 2. Summary Comparison of Potential Effects of Alternatives – Sumas LPOE**

Sumas LPOE Alternative 1 No Action Alternative	Sumas LPOE Alternative 2 Feasibility Study Preferred Alternative	Sumas LPOE Alternative 3 Commercial Inspection West	Sumas LPOE Alternative 4 Multi-Story Construction LPOE Expansion
<i>Land Use</i>			
<p>No changes in land use would occur. Current facilities and infrastructure at the existing LPOE would remain unchanged. In addition, no ground or subsurface disturbance or demolition and construction activities would occur, and land acquisition would not be needed.</p>	<p><b>Construction:</b> Direct, long-term, moderate, local, adverse impacts due to demolition and replacement of existing facilities. Additionally, GSA would need to acquire approximately 8.6 acres of land that currently includes commercial businesses used for shipping and receiving parcels, a closed grocery store that is currently used for small-scale book printing, a hotel/motel, a mixed-use facility, a Duty-free shop, an American Legion building, a gasoline station and mini mart, and their associated parking lots. As the project area is currently developed, land acquisition and subsequent construction would not result in land use conflicts or eliminate large portions of open space. Modification of portions of SR 9 would also occur.</p> <p><b>Operation:</b> Direct, long-term, minor, regional, beneficial impacts</p>	<p>Impacts under Sumas LPOE Alternative 3 would be the same as those for Alternative 2.</p>	<p>Impacts under Sumas LPOE Alternative 4 would be the same as those for Alternative 2.</p>
<i>Water Resources</i>			
<p>No ground or subsurface disturbance from new facility or infrastructure construction would occur; therefore, there would be no adverse impact to water resources.</p>	<p><b>Construction:</b> Indirect, short-term, negligible, local and regional, adverse impacts to adjacent surface waters due to the potential for increased erosion, sedimentation, and pollutants to receiving waters associated with up to approximately 12.6 acres of ground disturbance. Indirect, short-term, minor, site-specific and local, adverse impacts to groundwater depending on groundwater depth-to-water due to the potential for ground-disturbing activities (including installation of a geothermal energy system) to affect groundwater flow or further degrade existing groundwater quality. Direct and indirect, long-term, negligible to minor, site-specific, adverse impacts to floodplains that would be minimized through adherence to design standards and requirements related to development within floodplains. It would not be anticipated that construction would result in elevation changes within the 1-percent annual chance or 0.2-percent annual chance</p>	<p>Impacts under Sumas LPOE Alternative 3 would be the same as those for Alternative 2.</p>	<p>Impacts under Sumas LPOE Alternative 4 would be the same as those for Alternative 2.</p>



LYNDEN AND SUMAS, WA LPOE MODERNIZATION AND EXPANSION PROJECTS  
 RECORD OF DECISION

**Table 2. Summary Comparison of Potential Effects of Alternatives – Sumas LPOE**

Sumas LPOE Alternative 1 No Action Alternative	Sumas LPOE Alternative 2 Feasibility Study Preferred Alternative	Sumas LPOE Alternative 3 Commercial Inspection West	Sumas LPOE Alternative 4 Multi-Story Construction LPOE Expansion
	<p>floodplains that would increase the chance of flooding. No surface waters or wetlands occur within the project area.</p> <p><b>Operation:</b> Indirect, long-term, negligible, local and regional, adverse impacts on adjacent surface waters due to an increase in impervious surfaces resulting in increased stormwater runoff volumes. This alternative could add up to 1.8 acres of new impervious area within the project area. Adverse impacts to groundwater or floodplains would not be expected during operations. Due to a history of major flood events in this area, it is possible that operations of the modernized and expanded LPOE could be impacted by future flood events. Flooding impacts would be minimized by adherence to design standards and requirements related to development within floodplains.</p>		
<b>Biological Resources</b>			
<p>No ground disturbance from new facility or infrastructure construction would occur; therefore, there would be no adverse impacts on existing biological resources.</p>	<p><b>Construction:</b> Direct, short-term, minor, site-specific, adverse impacts associated with removal of vegetation during demolition and construction activities. Limited existing vegetation occurs within the project area. Direct and indirect, short-term, minor, local, adverse impacts on wildlife due to temporary habitat disruption and increases in noise and human activity. Existing vegetation onsite does not represent high-quality habitat for wildlife. With implementation of impact avoidance measures, this alternative may affect but would not likely adversely affect federally and state-protected species.</p> <p><b>Operation:</b> No additional adverse impacts to vegetation or wildlife would be expected.</p>	<p>Impacts under Sumas LPOE Alternative 3 would be the same as those for Alternative 2.</p>	<p>Impacts under Sumas LPOE Alternative 4 would be the same as those for Alternative 2.</p>
<b>Geology, Topography, and Soils</b>			
<p>No ground or subsurface disturbance from new facility or infrastructure construction would occur; therefore, there would be no adverse impacts</p>	<p><b>Construction:</b> Direct, short- and long-term, minor, site-specific, adverse impacts on geology and soils during demolition, clearing, and excavation for construction of new buildings and infrastructure, if implemented. Total maximum disturbance of approximately 12.6 acres. Direct, long-term, negligible, site-specific, adverse impacts on</p>	<p>Impacts under Sumas LPOE Alternative 3 would be the same as those for Alternative 2.</p>	<p>Impacts under Sumas LPOE Alternative 4 would be the same as those for Alternative 2.</p>

**Table 2. Summary Comparison of Potential Effects of Alternatives – Sumas LPOE**

Sumas LPOE Alternative 1 No Action Alternative	Sumas LPOE Alternative 2 Feasibility Study Preferred Alternative	Sumas LPOE Alternative 3 Commercial Inspection West	Sumas LPOE Alternative 4 Multi-Story Construction LPOE Expansion
on existing geology, topography, and soils.	topography due to vegetation removal and site grading as required; however, as the majority of the project area is relatively flat and previously disturbed, topography would not change substantially.  <b>Operation:</b> Direct, long-term, negligible, site-specific, adverse impacts on soils due to an increase in impervious surfaces (up to 1.8 acres of new impervious area within the project area). No additional adverse impacts to geology or topography would be expected.		
<b><i>Air Quality, Climate Change, and Greenhouse Gases</i></b>			
No construction or changes to onsite operations would occur; therefore, there would be no changes to air quality and GHG emissions.	<b>Construction:</b> Direct, short-term, minor, regional, adverse impacts on air quality from construction emissions. Construction activities would comply with all applicable federal, state, and local regulations relating to air quality, including any permitting and registration requirements. Direct, short-term, negligible, regional, adverse impact to GHG emissions and global climate change primarily from use of fuel in construction equipment, worker vehicles, and delivery and refuse trucks.  <b>Operation:</b> Direct and indirect, long-term, negligible to minor, regional, adverse impacts on air quality due to a likely increase in energy demand at the modernized and expanded LPOE. Reductions in wait times for POVs could lower vehicle idling emissions, partially offsetting anticipated increases. Direct, long-term, negligible, regional, adverse impact to GHG emissions and climate change due to a likely increase in energy demand and number of employees commuting to the LPOE. Reductions in wait times for POVs could lower vehicle idling emissions, partially offsetting this increase.	Impacts under Sumas LPOE Alternative 3 would be the same as those for Alternative 2.	Impacts under Sumas LPOE Alternative 4 would be the same as those for Alternative 2.
<b><i>Human Health and Safety</i></b>			
Current facilities and infrastructure at the existing LPOE would remain unchanged; therefore, negligible	<b>Construction:</b> Direct, short-term, minor, site-specific, adverse impacts to the health and safety of construction workers, due to the risks inherent in construction activities. Direct and indirect, short-term, negligible to minor, local,	Impacts under Sumas LPOE Alternative 3 would be the same as those for Alternative 2.	Impacts under Sumas LPOE Alternative 4 would be the same as those for Alternative 2.

**Table 2. Summary Comparison of Potential Effects of Alternatives – Sumas LPOE**

Sumas LPOE Alternative 1 No Action Alternative	Sumas LPOE Alternative 2 Feasibility Study Preferred Alternative	Sumas LPOE Alternative 3 Commercial Inspection West	Sumas LPOE Alternative 4 Multi-Story Construction LPOE Expansion
<p>adverse impacts would continue, associated with ongoing maintenance, which would require negligible amounts of hazardous materials usage and generate negligible amounts of hazardous waste, in addition to potential risks to human health and safety associated with existing conditions and current operations.</p>	<p>adverse impacts from hazardous materials use and waste handling due to the potential increase in such materials/wastes during demolition and construction activities, and the potential to encounter contaminated soil during excavation activities (removal of contaminated soil would represent a direct, long-term, moderate, beneficial impact to human health and safety). Construction would not cause demand or create hazardous conditions that would exceed the capacities of existing fire protection and emergency services.</p> <p><b>Operation:</b> Direct and indirect, long-term, moderate, local, beneficial impacts on human health and safety, as the expanded and modernized LPOE would be compliant with applicable building and safety codes, and updated configurations would improve traffic patterns and minimize the risk of accidents. Direct, long-term, negligible to minor, local, adverse impacts could also result from radiation emissions from inspection equipment, although operations would be conducted in accordance with all applicable standards and codes. Direct and indirect, long-term, negligible to minor, local, adverse impacts associated with hazardous materials and waste handling, due to the potential storage of petroleum and use of paints and cleaners in facility maintenance activities. All hazardous materials would be managed in accordance with applicable federal, state, and local regulations. If implemented, closed loop geothermal systems would use antifreeze, propylene glycol, or ethanol solution as a heat exchange fluid; however, regular maintenance would minimize any potential for leaks.</p>		
<b>Infrastructure and Utilities</b>			
<p>Current facilities and infrastructure at the existing LPOE would remain. The LPOE would not benefit from updated facilities and infrastructure with LEED® certification that would</p>	<p><b>Construction:</b> Direct, short-term, minor, site-specific, adverse impacts while existing infrastructure is demolished, and new facilities are constructed. Direct, short-term, negligible, adverse impacts locally due to increased demand on public utilities. Direct, short-term, minor, site-specific, adverse impacts on utility services as utility</p>	<p>Impacts under Sumas LPOE Alternative 3 would be the same as those for Alternative 2.</p>	<p>Impacts under Sumas LPOE Alternative 4 would be the same as those for Alternative 2.</p>

**Table 2. Summary Comparison of Potential Effects of Alternatives – Sumas LPOE**

Sumas LPOE Alternative 1 No Action Alternative	Sumas LPOE Alternative 2 Feasibility Study Preferred Alternative	Sumas LPOE Alternative 3 Commercial Inspection West	Sumas LPOE Alternative 4 Multi-Story Construction LPOE Expansion
<p>be designed to accommodate renewable energy sources and achieve sustainable standards.</p>	<p>relocation and reconnection is required, due to the potential for temporary, intermittent shut offs. Construction of new utilizes would be conducted in accordance with applicable local and state regulations.</p> <p><b>Operation:</b> Direct, long-term, major, site-specific, beneficial impacts on infrastructure, as newly constructed facilities would comply with current GSA standards, building codes, and P100 standards, would have LEED® Gold Certification at minimum, and would support updated operational needs for CBP. New facilities, updated layout, improved inspection lanes, and updated parking lot design would improve the efficiency of processing pedestrians, COVs, and POVs, and would relieve traffic congestion. Direct, long-term, major, site-specific, beneficial impacts on utilities, due to proposed upgrades and/or replacement with more modernized systems. Direct, long-term, negligible, local, adverse impacts to public electricity and telecommunication utilities would result due to increased demand; however, much of this demand would be offset by a more efficient, sustainable facility design.</p>		
<b>Traffic and Transportation</b>			
<p>Under this alternative, existing issues related to traffic congestion (and related safety and security issues) would remain unchanged.</p>	<p><b>Construction:</b> Short-term, negligible to minor, adverse traffic impacts due to an increase in workers commuting to the site (approximately 10 to 15 workers per day for much of construction, with a peak of 50 to 70 workers). Under the Concurrent Construction Option, it is likely that some traffic would divert temporarily to other nearby ports. Under the Sequential Option, the Lynden LPOE would be closed during construction, requiring all traffic from the port to use an alternative location. Even if all Lynden LPOE traffic diverted to the Sumas LPOE, SR 9 would continue to meet WSDOT level of service standard.</p> <p><b>Operation:</b> Long-term, beneficial impacts on safety, security, and congestion at the LPOE due to improved traffic configurations. No long-term impact on traffic volumes would occur.</p>	<p>Impacts under Sumas LPOE Alternative 3 would be the same as those for Alternative 2.</p>	<p>Impacts under Sumas LPOE Alternative 4 would be the same as those for Alternative 2.</p>

**Table 2. Summary Comparison of Potential Effects of Alternatives – Sumas LPOE**

Sumas LPOE Alternative 1 No Action Alternative	Sumas LPOE Alternative 2 Feasibility Study Preferred Alternative	Sumas LPOE Alternative 3 Commercial Inspection West	Sumas LPOE Alternative 4 Multi-Story Construction LPOE Expansion
<b>Noise and Vibration</b>			
<p>No construction or changes to onsite operations would occur; therefore, there would be no new increases in noise levels or adverse impacts to the noise environment and associated vibration.</p>	<p><b>Construction:</b> Direct, short-term, minor to moderate, adverse noise impacts associated with construction activities. The closest residences to the area where construction activities would occur are approximately 80 feet away. If all equipment were operating simultaneously, it is estimated that noise levels would be approximately 89 dBA outdoors and 69 dBA indoors (with windows shut) at that distance. Occupants of the Valley Community Church and Sumas City Hall may also be impacted by increased noise levels; noise levels at these locations during construction would not be expected to exceed 90 dBA outdoors and 70 dBA indoors (with windows shut) for temporary periods. These levels are below thresholds considered harmful by the USEPA and WHO. Increased traffic could also contribute to temporary, intermittent increases in noise, resulting in direct, short-term, minor, adverse noise impacts along primary transportation corridors. Regarding vibration, anticipated PPV levels do not reach the level at which structural damage to historic or non-historic structures could occur (0.1 and 0.3 inches per second, respectively) or the threshold that could result in human annoyance (0.2 inches per second). Therefore, no adverse vibration impacts would occur.</p> <p><b>Operation:</b> No additional adverse impacts on noise levels or vibration would be expected.</p>	<p>Impacts under Sumas LPOE Alternative 3 would be the same as those for Alternative 2.</p>	<p>Impacts under Sumas LPOE Alternative 4 would be the same as those for Alternative 2.</p>
<b>Socioeconomics</b>			
<p>No new facility or infrastructure construction would occur; therefore, there would be no impacts on existing population and housing, labor and income, the local economy, and public services within the Sumas CCD.</p>	<p><b>Construction:</b> Direct, short- to long-term, minor to moderate, local and regional, adverse impacts due to proposed land acquisition, which would displace at least four active businesses as well as the American Legion Post 212. GSA would provide relocation assistance for applicable stakeholders in accordance with the Uniform Act. Direct, short-term, minor, local and regional, adverse impacts to housing could result due to an influx of construction workers placing temporary, increased demand</p>	<p>Impacts under Sumas LPOE Alternative 3 would be the same as those for Alternative 2.</p>	<p>Impacts under Sumas LPOE Alternative 4 would be the same as those for Alternative 2.</p>

**Table 2. Summary Comparison of Potential Effects of Alternatives – Sumas LPOE**

Sumas LPOE Alternative 1 No Action Alternative	Sumas LPOE Alternative 2 Feasibility Study Preferred Alternative	Sumas LPOE Alternative 3 Commercial Inspection West	Sumas LPOE Alternative 4 Multi-Story Construction LPOE Expansion
	<p>on local housing. Lodging opportunities are somewhat limited in the project area; however, 50 hotels are located within 25 miles of the Sumas LPOE.</p> <p>Under the Concurrent Construction Option, direct and indirect, short-term, minor to moderate, adverse local socioeconomic impacts may result as commercial traffic is redirected to other ports in the region. If travelers choose to reroute to other LPOEs, there could be indirect, short-term, minor to moderate, local, adverse impact on the Sumas economy, which relies directly on the Sumas LPOE for economic support. Direct, short-term, negligible to minor, local, beneficial impacts could result as construction workers utilizing temporary lodging spend wages locally. Under the Sequential Construction Option, indirect, short-term, minor to moderate, local, adverse impacts could occur if travelers choose to utilize other LPOEs while the Sumas LPOE is undergoing construction.</p> <p><b>Operation:</b> Direct, long-term, negligible to minor, local, beneficial impacts on population, labor, and earnings would result from increased staffing at the expanded and modernized LPOE (anticipated increase of 26 full-time employees to the current staff of 73). Direct, long-term, minor, local, adverse impacts on available housing. Additional personnel with school-age children could result in a direct, long-term, negligible, adverse impact on the school system. Reduced traffic times would have direct, long-term, minor to moderate, beneficial economic impacts to the Sumas CCD. Shorter wait times for tourists could result in direct and indirect, long-term, minor to moderate, local, beneficial impacts on earnings and employment within the Sumas CCD if tourists increase spending in the area. Direct and indirect, long-term, minor, local, beneficial impacts to community services due to improved roadway safety.</p>		

LYNDEN AND SUMAS, WA LPOE MODERNIZATION AND EXPANSION PROJECTS  
 RECORD OF DECISION

**Table 2. Summary Comparison of Potential Effects of Alternatives – Sumas LPOE**

Sumas LPOE Alternative 1 No Action Alternative	Sumas LPOE Alternative 2 Feasibility Study Preferred Alternative	Sumas LPOE Alternative 3 Commercial Inspection West	Sumas LPOE Alternative 4 Multi-Story Construction LPOE Expansion
<b><i>Environmental Justice and Protection of Children's Health and Safety</i></b>			
<p>Current facilities and infrastructure at the existing LPOE would remain; therefore, there would be no change in conditions related to minority and low-income populations or children's health and safety.</p>	<p><b>Construction:</b> Direct, short-term, minor to moderate, local, adverse impacts on children's health and safety, as children may be present in residences or at the Sumas Elementary School located within 1 mile of the project area. Children are especially vulnerable to air pollution and increased noise levels may affect learning.</p> <p><b>Operation:</b> Direct, long-term, negligible, local, beneficial impact on children's health and safety, as operations would remain comparable to current conditions, but more efficient.</p> <p>No environmental justice communities are located within a 1-mile radius of the Sumas LPOE project area; therefore, no adverse impacts to these communities would occur during construction or operation.</p>	<p>Impacts under Sumas LPOE Alternative 3 would be the same as those for Alternative 2.</p>	<p>Impacts under Sumas LPOE Alternative 4 would be the same as those for Alternative 2.</p>

CBP = U.S. Customs and Border Protection  
 CCD = census county division  
 COV = commercially owned vehicle  
 dBA = decibels on an A-weighted scale

GHG = greenhouse gas  
 GSA = U.S. General Services Administration  
 LEED® = Leadership in Energy and Environmental Design  
 LPOE = Land Port of Entry

POV = privately owned vehicle  
 PPV = peak particle velocity  
 USEPA = United States Environmental Protection Agency  
 WHO = World Health Organization

**Table 3. Impact Reduction Measures and Best Management Practices**

Resource Area	Impact Reduction Measures
Land Use	<p>Although local governments cannot regulate or permit activities of the federal government on federally owned land, GSA will consider local zoning laws for construction and operation of the proposed LPOE and all design requirements of state and local governments to the extent practicable. This could include both the incorporation of exterior design elements to reflect the unique character of the area and the emphasis on pedestrian circulation and amenities, such as landscaped plazas and walkways, to the extent practicable and consistent with GSA design standards. To ensure minimal conflicts with land use, GSA will also continue coordination efforts during the design process with city and county governments, WSDOT, utility providers, and other stakeholders.</p>
Water Resources	<p>LEED® Gold certification for the project will include objectives for avoiding adverse impacts to water quality and minimizing risks from flooding hazards. In addition, GSA requires a minimum SITES Silver rating.</p> <p>GSA will follow the impact reduction measures and BMPs outlined in the NPDES permit. GSA will also take into account BMPs listed in the Stormwater Manual for Western Washington.</p> <p>GSA will seek to adhere to development standards provided in the city of Sumas' critical area ordinance to address current and future flood risks to the greatest extent practicable.</p> <p>A geotechnical investigation will be completed prior to construction to determine subsurface site conditions and depth to groundwater. The results of the investigation may result in the inclusion of additional measures in the project's final design to protect groundwater quality from inadvertent contamination that could occur during construction activity. Additionally, decisions related to depth of foundations and footers will not be made until the results of the investigation are available.</p> <p>GSA additionally commits to:</p> <ul style="list-style-type: none"> <li>• Developing in compliance with Section 438 of the 2007 EISA with the objective of restoring the hydrology to predevelopment conditions;</li> <li>• Considering green infrastructure and low impact development practices, such as reducing impervious surfaces, using vegetated swales and revegetation, and using porous pavements;</li> <li>• Developing an SPCC plan, as applicable; and</li> <li>• Implementing conservation measures to ensure sustainable water use during construction and operation. Such measures could include but are not limited to, use of recycled water for landscaping, xeriscaping, and water conservation education.</li> </ul>
Biological Resources	<p>General measures to reduce or avoid construction impacts on biological resources will include:</p> <ul style="list-style-type: none"> <li>• Only approved, native species will be used for revegetation. When possible, pollinator-friendly plant species will be used. These plant species will not be invasive or noxious species, and disturbed areas will be promptly restored or revegetated to the extent practicable following construction.</li> <li>• Construction equipment will be washed before and after coming to the site to the extent practicable to limit the transport of invasive species. If non-native invasive species are present in the project area, these plants will be eradicated and removed from the site before earthmoving activities begin.</li> <li>• All buildings scheduled for demolition will be inspected for nests prior to any demolition activities. Any further requirements would be determined in coordination with applicable state and federal resource agencies pending survey results.</li> <li>• If construction activities occur within the nesting periods of migratory birds that could be impacted by site work or the yellow-billed cuckoo (June to early August), surveys will be conducted for nests prior to initiating demolition or construction activities. Any further requirements would be determined in coordination with applicable federal resource agencies pending survey results.</li> </ul>



**Table 3. Impact Reduction Measures and Best Management Practices**

Resource Area	Impact Reduction Measures
	<ul style="list-style-type: none"> <li>• If milkweed plants are observed within the proposed expansion areas, they will be avoided to the extent practicable in order to reduce potential impacts to the federal candidate monarch butterfly. If avoidance is not practicable, milkweed plants will be transplanted outside of the project area. When transplanting milkweed plants, care will be taken to retain as much of the tap root as possible. Digging 4 inches away from each side of the plant will help avoid cutting the tap root. Transplanting in early spring or in late summer/late fall may also increase success.</li> <li>• If the project is determined to have potential to disturb or kill eagles, a permit under the BGEPA will be obtained.</li> </ul>
<p>Geology, Topography, and Soils</p>	<p>Measures to reduce construction impacts on geology and soil-related concerns, such as soil erosion, loss, and stability, will be addressed in the project design plans, as well as through erosion and sediment controls and site stabilization measures as specified through applicable NPDES permit requirements. Such measures would include setting up barriers and utilizing standard BMPs (e.g., earth walls, soil nails, riprap, turbidity barriers, etc.) to reduce impacts to soils or from soil erosion. Refer to Water Resources, for a discussion of additional measures that would limit impacts from soil loss as a result of erosion during construction and operations.</p>
<p>Air Quality, Climate Change, and Greenhouse Gases</p>	<p>Construction activities within the project area would generate fugitive dust (non-toxic PM) emissions. Precautions to prevent PM from becoming airborne will include:</p> <ul style="list-style-type: none"> <li>• Using water for dust control when grading roads or clearing land.</li> <li>• Stabilizing open storage piles and disturbed areas by covering and/or applying water or organic dust palliative where appropriate. This is applicable to both active and inactive sites during workdays, weekends, holidays, and windy conditions.</li> <li>• Paving roadways and maintaining them in a clean condition.</li> <li>• Covering open equipment when conveying or transporting material likely to create objectionable air pollution when airborne.</li> <li>• Promptly removing spilled or tracked dirt or other materials from other streets.</li> <li>• Installing wind fencing and phasing grading operations where appropriate and operating water trucks for stabilization of surfaces under windy conditions.</li> <li>• When hauling material and operating non-earthmoving equipment, preventing spillage, limiting speeds to 15 mph and limiting speeds of earth-moving equipment of 10 mph.</li> </ul> <p>The following source-specific controls will be considered to minimize emissions during construction activities:</p> <ul style="list-style-type: none"> <li>• Reduce unnecessary idling from heavy equipment.</li> <li>• Prohibit engine tampering to increase horsepower, except when meeting manufacturer's recommendations.</li> <li>• Lease or buy newer, cleaner equipment using the best available emissions control technologies.</li> <li>• Use lower-emitting engines and fuels, including electric, liquified gas, hydrogen fuel cells, and/or alternative diesel formulations, if feasible.</li> <li>• Have on-highway vehicles meet, or exceed, the USEPA exhaust emissions standards for model year 2010 and newer heavy-duty nonroad compression-ignition engines (e.g., nonroad trucks, construction equipment, cargo handlers, etc.).</li> <li>• Have nonroad vehicles and equipment meet, or exceed, the USEPA Tier 4 exhaust emissions standards for heavy-duty nonroad compression-ignition engines (e.g., nonroad trucks, construction equipment, cargo handlers, etc.).</li> </ul>

**Table 3. Impact Reduction Measures and Best Management Practices**

Resource Area	Impact Reduction Measures
	<p>The following administrative controls will be considered during construction:</p> <ul style="list-style-type: none"> <li>• Locate diesel engines, motors, and equipment staging areas as far as possible from residential areas and other sensitive receptors (e.g., schools, daycare centers, hospitals, senior centers, etc.).</li> <li>• Avoid routing truck traffic near sensitive land uses to the fullest extent feasible.</li> <li>• Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emissions controls for each piece of equipment before groundbreaking.</li> <li>• Reduce construction-related trips of workers and equipment, including trucks.</li> <li>• Develop a construction traffic and parking management plan, if required, that minimizes traffic interference and maintains traffic flow and safety.</li> <li>• Implement measures to minimize idling emissions from cars waiting to cross the border, such as anti-idling policies.</li> <li>• GSA will require the contractor to develop and implement a Fugitive Dust and Emission Control Plan that documents state regulatory requirements and defines the standard and operating procedures for the control measures specified in the Final EIS.</li> </ul> <p>Many of the mitigation measures for air quality identified above would also serve to reduce GHG emissions. GSA will take the following additional steps to minimize GHGs:</p> <ul style="list-style-type: none"> <li>• Use low embodied carbon concrete and environmentally preferable asphalt cement that reduce GHG emissions.</li> <li>• Recycle construction debris to the maximum extent feasible.</li> </ul> <p>The following measures will be implemented as part of LPOE building design to reduce impacts from climate change:</p> <ul style="list-style-type: none"> <li>• GSA will consider implementing modified ventilation practices (e.g. Minimum Efficiency Reporting Value 13 or higher HVAC systems) to minimize impacts to indoor air quality from prolonged wildfire events.</li> <li>• GSA will consider adopting hazard-resistant building codes to increase safety, reduce financial loss, and support rapid recovery after disasters.</li> </ul>
Human Health and Safety	<p>Measures that will limit impacts related to human health and safety during construction and operation include:</p> <ul style="list-style-type: none"> <li>• Prior to demolition, an inspection of the buildings to be demolished would be performed by a licensed asbestos inspector and a demolition application will be completed and filed with the NWCAA.</li> <li>• Water will be applied to the ground surface during construction and other soil disturbing activities as a means of dust suppression.</li> <li>• GSA will require diversion of at least 50 percent of nonhazardous construction and demolition waste from landfills per Section 207 of EO 14057, Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability.</li> <li>• All spills or releases of petroleum, oils, lubricants, hazardous materials, pollutants, or contaminants will be handled in accordance with measures outlined in a Spill Prevention and Response Plan prepared for construction.</li> <li>• GSA will develop a SPCC plan during final design for operations of each facility, assuming the facility meets the requirements to prepare a plan per 40 CFR 112.</li> </ul>

**Table 3. Impact Reduction Measures and Best Management Practices**

Resource Area	Impact Reduction Measures
	<ul style="list-style-type: none"> <li>• As a BMP, a Soil Management Plan will be prepared to address the potential for encountering areas of environmental concern (e.g., contaminated soil) during grading, excavation, or other subsurface disturbance. The Soil Management Plan will identify specific measures to address hazardous waste and materials cleanup efforts, including monitoring, handling, stockpiling, characterization, onsite reuse, export, and disposal protocols for excavated soil.</li> <li>• All personnel will follow federal regulations and standard handling procedures as specified in product Safety Data Sheets for hazardous materials.</li> <li>• All potentially hazardous wastes generated will be properly characterized, segregated, and managed onsite prior to offsite disposal.</li> <li>• If PCB-containing materials are identified onsite, appropriate abatement actions for their disposal would be implemented in accordance with regulatory requirements, and soils beneath transformers will be evaluated for evidence of releases. If present in underlying soils, appropriate actions for removal and disposal will be implemented in accordance with applicable regulatory requirements.</li> <li>• Any existing municipal (household) trash, construction debris, and other waste materials will be removed from all project areas and disposed of in accordance with applicable regulations.</li> <li>• Potentially hazardous wastes generated during project-related construction activities will be disposed of or recycled at appropriate facilities in accordance with applicable regulatory requirements.</li> <li>• Construction workers will adhere to safety standards promulgated in 29 CFR 17 to protect against workplace hazards. To minimize potential exposure or safety concerns to workers, appropriate personal protection equipment will be worn.</li> <li>• Signs, barriers, and traffic cones will be installed to direct vehicles and non-construction personnel away from the construction area.</li> </ul>
Infrastructure and Utilities	<p>GSA will coordinate with utility providers in advance of demolition and construction activities to determine the best course of action to avoid or minimize impacts, either by implementing measures to protect utility lines or by arranging for their temporary or permanent relocation.</p>
Traffic and Transportation	<p>Measures that will mitigate the impacts associated with traffic during construction include:</p> <ul style="list-style-type: none"> <li>• Minimize construction truck movement during peak traffic hours;</li> <li>• Place construction staging areas where they would least interfere with local traffic and parking;</li> <li>• Minimize impacts to pedestrians during construction activities by providing appropriate information and signage to pedestrians and motorists who are traveling through the area; and</li> <li>• Develop a construction traffic and parking management plan, if required, that minimizes traffic interference and maintains traffic flow and safety.</li> </ul>

**Table 3. Impact Reduction Measures and Best Management Practices**

Resource Area	Impact Reduction Measures
Noise and Vibration	<p>Potential construction noise impacts will be minimized to the extent practicable utilizing standard noise control measures, such as equipment noise controls (e.g., mufflers), limitations or prohibition of equipment idling, minimizing equipment usage to short periods of time to the extent possible, and limitations or prohibitions on running equipment for extended periods when not necessary. OSHA regulations (i.e., wearing hearing protection and limiting exposure) will be followed to reduce the impact of high noise levels on construction workers that could occur during construction.</p> <p>Nighttime (10 PM to 7 AM) construction activities at either LPOE will require a variance from Washington State. Nighttime construction activities at the Sumas LPOE will require a variance from the city of Sumas.</p> <p>No impact reduction measures are required for vibration as no impacts would occur.</p>
Socioeconomics	<p>Measures to reduce construction impacts described for other resource topics (particularly air quality, noise, and traffic) will also reduce adverse impacts on quality of life.</p>
Environmental Justice and Protection of Children’s Health and Safety	<p>Disproportionate impacts to communities with environmental justice concern would not occur under any of the alternatives. Therefore, no impact reduction measures are required. Measures to reduce construction impacts described for other resource topics (particularly air quality, noise, and traffic) would also reduce adverse impacts on children’s health and safety.</p>

BGEPA = Bald and Golden Eagle Protection Act  
 BMP = best management practices  
 CFR = Code of Federal Regulations  
 EIS = Environmental Impact Statement  
 EISA = Energy Independence and Security Act  
 EO = Executive Order  
 GHG = greenhouse gas  
 GSA = U.S. General Services Administration

HVAC = heating, ventilation, and air conditioning  
 LEED® = Leadership in Energy and Environmental Design  
 LPOE = Land Port of Entry  
 mph = miles per hour  
 NPDES = National Pollutant Discharge Elimination System  
 NWCAA = Northwest Clean Air Agency  
 PCB = non-polychlorinated biphenyl  
 PM = particulate matter

ROI = region of interest  
 SITES = Sustainable Sites Initiative  
 SPCC = spill prevention, control, and countermeasures  
 USEPA = United States Environmental Protection Agency  
 WSDOT = Washington State Department of Transportation

**MITIGATION MONITORING AND ENFORCEMENT PROGRAM (MMEP)**

A MMEP will be implemented to ensure that the proposed impact reduction measures and BMPs identified in Table 3 are implemented as part of the projects. The MMEP will identify the timing, responsibility, and method of implementation of the proposed measures, as well as any required monitoring and enforcement activities. As part of this program, the project contractor will be required to implement the mitigation measures arising from project activities. GSA will inspect and monitor these measures to ensure compliance. Any operational mitigation measures will be implemented through the GSA Property Management Office. The MMEP will be maintained by GSA throughout project implementation and will be included as part of the administrative record for the projects.

**DECISION**

As Regional Commissioner of GSA Northwest/Arctic Region, Public Buildings Service, it is my decision to approve Lynden LPOE Alternative 3 (North-South Oriented LPOE Expansion) and Sumas LPOE Alternative 4 (Multi-Story Construction LPOE Expansion).

**ENVIRONMENTALLY PREFERABLE ALTERNATIVES**

The environmentally preferable alternative is the alternative that best promotes the national environmental policy expressed within NEPA. In general, this refers to the alternative that will result in the least damage to the environment and best protects natural, social, and cultural resources. GSA considered the findings in the Final EIS, stakeholder input, public comments, and tenant needs at the LPOEs to determine the environmentally preferable alternatives. GSA's preferred alternatives are also the environmentally preferable alternatives and are discussed below.

GSA has identified Lynden LPOE Alternative 3 as the environmentally preferable alternative because the maximum proposed limits of disturbance would be smaller compared to Lynden LPOE Alternative 2 (10.3 acres versus 14.5 acres) and Lynden LPOE Alternative 3 would require lower quantities of fill because of the smaller project footprint and differences in elevation change across the project site.

Sumas LPOE Alternative 2 (Feasibility Study Preferred Alternative), Sumas LPOE Alternative 3 (Commercial Inspection West), and Sumas LPOE Alternative 4 (Multi-Story Construction LPOE Expansion) would be the same action and constructed within the same limits of disturbance (12.6 acres), with the only noted differences being the LPOE's potential alignment, layout, and operating efficiency. Therefore, potential environmental impacts to each of these alternatives are similar and all alternatives could be identified as the environmentally preferable alternative.

**RATIONALE FOR IMPLEMENTING THE PREFERRED ALTERNATIVES**

GSA considered the findings in the Final EIS, stakeholder input, public comments, and tenant needs at the LPOEs to determine the preferred alternatives, which are discussed below. The preferred alternatives were selected because they best meet the purpose and need of the Proposed Action, while resulting in the fewest substantial, adverse environmental consequences.

GSA's preferred alternative for the Lynden LPOE is to implement Lynden LPOE Alternative 3 (North-South Oriented LPOE Expansion). This alternative was selected because it would match the same orientation of the existing LPOE and facilitate more efficient traffic flow.

GSA's preferred alternative for the Sumas LPOE is to implement Sumas LPOE Alternative 4 (Multi-Story Construction LPOE Expansion). This alternative was selected because the operational space within the Main Building would be consolidated, and the building would use a smaller footprint within the LPOE allowing more space for other LPOE functions and increasing LPOE operational efficiency. This alternative would also add a pedestrian bridge, further increasing employee safety.


I have determined that Lynden LPOE Alternative 3 (North-South Oriented LPOE Expansion) and Sumas LPOE Alternative 4 (Multi-Story Construction LPOE Expansion) will best support CBP's mission by

LYNDEN AND SUMAS, WA LPOE MODERNIZATION AND EXPANSION PROJECTS  
RECORD OF DECISION

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bringing the Lynden LPOE and Sumas LPOE operations in line with CBP’s land port design standards and operational requirements, while addressing existing deficiencies. My decision to approve these two alternatives is based on balancing likely adverse impacts with the need to improve the operational efficiency, security, and safety for the CBP staff and cross-border travelers at the LPOEs. This decision takes into account resource concerns, the mission and program of CBP, and public interests as analyzed in the Final EIS. I have reached this decision after careful consideration of the environmental analysis of the effects of the Proposed Action, the action alternatives, and No Action Alternative for modernizing and expanding the Lynden LPOE and Sumas LPOE in concert with the needs of the federal government and other stakeholders.

Record of Decision Approval:

DocuSigned by:  
Signature:  Date: 12/17/2024  
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Lisa Pearson  
Regional Commissioner  
Northwest/Arctic Region  
Public Buildings Service  
U.S. General Services Administration

*LYNDEN AND SUMAS, WA LPOE MODERNIZATION AND EXPANSION PROJECTS*  
*RECORD OF DECISION*

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**ATTACHMENT 1: COMMENTS RECEIVED ON THE FINAL EIS**



**REGION 10**  
SEATTLE, WA 98101

December 16, 2024

Patrick Manning, Capital Project Manager  
Lynden and Sumas LPEs EIS  
U.S. General Services Administration  
Northwest/Arctic Region 10  
1301 A Street, Suite 610  
Tacoma, Washington 98402

Dear Patrick Manning:

The U.S. Environmental Protection Agency has reviewed General Services Administration's (GSA) Final Environmental Impact Statement for the Kenneth G. Ward (Lynden) and Sumas Land Ports of Entry (LPOEs) Modernization and Expansion Projects (CEQ #20240204; EPA Project Number 23-0030-GSA). The EPA has conducted its review pursuant to the National Environmental Policy Act and our review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to the EPA and requires the EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement.

The FEIS evaluates the potential environmental impacts associated with activities to modernize and expand the existing Lynden and Sumas LPOEs in Whatcom County, Washington on the U.S.-Canada border. Existing structures at both ports do not meet specified space and facility requirements of the Customs and Border Protection and lack dedicated outbound inspection infrastructure. The proposed projects will improve each port's efficiency and effectiveness by constructing new facilities. Project activities will disturb nearly 15 acres of land at Lynden LPOE and 13 acres at Sumas LPOE. For analysis of impacts from the proposed projects, GSA considered two action alternatives for the Lynden LPOE, three action alternatives for the Sumas LPOE, and a no action for each LPOE. The FEIS identifies Alternative 3 (North-South Oriented LPOE Expansion) as the preferred alternative for Lynden LPOE and Alternative 4 (Multi-Story Construction LPOE Expansion) for Sumas LPOE. Both preferred alternatives will minimize projects' footprints and result in more efficient commercial traffic flow at Lynden LPOE and operational efficiency at Sumas LPOE.

The EPA finds the FEIS addresses our Draft EIS comments. The EPA notes added clarifying information on measures to protect water resources, improve air quality, and sustainable building designs to adapt to a changing climate. In addition, the EPA offers the following recommendations for consideration in the Record of Decision for the project:



LYNDEN AND SUMAS, WA LPOE MODERNIZATION AND EXPANSION PROJECTS  
RECORD OF DECISION

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- Commit to continued consultation and meaningful engagement with affected Tribes to further explore ways to avoid, minimize, and mitigate the projects' potential impacts to these communities. Promising Practices for Environmental Justice Methodologies in NEPA reviews<sup>1</sup> and Executive Order 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All<sup>2</sup> may offer useful guidance for conducting meaningful engagement.
- Finalize the project's Fugitive Dust and Emission Control Plan and commit to implementing Washington State Department of Ecology's recommended measures to control emissions and ensure federal and state air quality standards will be met by the project.
- Carry forward proposed renewable energy actions to help minimize climate and air impacts.
- Commit to continued coordination with other federal and state agencies, Tribes, and other impacted stakeholder groups to ensure the project is implemented in a manner protective of human health and the environment. Coordination with the U.S. Fish and Wildlife Service and Washington State Departments of Ecology and Fish and Wildlife will be important due to the project's potential impacts to water, air, and biological resources.

Thank you for the opportunity to review the FEIS for this project. If you have questions about this review, please contact Theo Mbabaliye of my staff at (206) 553-6322 and [mbabaliye.theogene@epa.gov](mailto:mbabaliye.theogene@epa.gov), or me, at (206) 553-2117 or at [sturges.susan@epa.gov](mailto:sturges.susan@epa.gov).

Sincerely,

SUSAN  
STURGES

Digitally signed by  
SUSAN STURGES  
Date: 2024.12.16  
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Susan Sturges, Acting Manager  
NEPA Branch

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<sup>1</sup> [https://www.epa.gov/sites/default/files/2016-08/documents/nepa\\_promising\\_practices\\_document\\_2016.pdf](https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf). Accessed 12/9/2024.

<sup>2</sup> <https://www.federalregister.gov/documents/2023/04/26/2023-08955/revitalizing-our-nations-commitment-to-environmental-justice-for-all>. Accessed 12/9/2024.