



U.S. General Services Administration

# Environmental Impact Statement for the Kenneth G. Ward (Lynden) and Sumas Land Ports of Entry Modernization and Expansion Projects Lynden and Sumas, Washington

## Volume II – Appendix A Consultation and Coordination – PART 2 Final



November 2024

Identification Number: EISX-023-00-010-1728643103

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## ACRONYMS

<b>Acronym</b>	<b>Definition</b>
AADT	Annual Average Daily Traffic
ACM	asbestos-containing material
ADA	Americans with Disabilities Act
AG	Agriculture
APE	area of potential effect
AST	aboveground storage tank
ASTM	American Society for Testing and Materials
BC	British Columbia
BCC	birds of conservation concern
BGEPA	Bald and Golden Eagle Protection Act
BMP	best management practices
BNSF	Burlington Northern Santa Fe Railroad
BTS	Bureau of Transportation Statistics
CAA	Clean Air Act
CBP	Customs and Border Protection
CBSA	Canada Border Services Agency
CCD	census county division
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CGP	Construction General Permit
CH <sub>4</sub>	methane
CO <sub>2</sub>	carbon dioxide
COG	Council of Government
COV	commercially owned vehicle
CWA	Clean Water Act
dB	decibels
DFA	Duty Free Americas
dBA	decibels on an A-weighted scale
DOSH	Division of Occupational Safety and Health
EIS	Environmental Impact Statement
EISA	Energy Independence and Security Act
EO	Executive Order
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
GHG	greenhouse gas
GMA	Growth Management Act
GSA	U.S. General Services Administration
GWP	global warming potential
HAP	hazardous air pollutant
HSS	highways of statewide significance
HUC	Hydrologic Unit Code
IDP	Inadvertent Discovery Plan

<b>Acronym</b>	<b>Definition</b>
IECC	International Energy Conservation Code
IPaC	Information for Planning and Consultation
LBP	lead-based paint
LEED®	Leadership in Energy and Environmental Design
LPOE	Land Port of Entry
LRR	Land Resource Region
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
MLRA	Major Land Resource Area
mph	miles per hour
MPO	Metropolitan Planning Organization
msl	mean sea level
MTCA	Model Toxics Control Act
N <sub>2</sub> O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAICS	North American Industry Classification System
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NII	non-intrusive inspection
NO <sub>x</sub>	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NSPS	New Source Performance Standard
NSR	New Source Review
NWCAA	Northwest Clean Air Agency
O <sub>3</sub>	ozone
OSHA	Occupational Health and Safety Administration
PBS	Public Buildings Service
PCB	non-polychlorinated biphenyl
PDS	Program Development Study
PM <sub>2.5</sub>	very fine particulate matter 2.5 micrometers or smaller
PM <sub>10</sub>	fine particulate matter 10 micrometers or smaller
POV	privately owned vehicle
ppm	parts per million
PPV	peak particle velocity
PSD	Prevention of Significant Deterioration
PSE	Puget Sound Energy
RCRA	Resources Conservation and Recovery Act of 1976
RCW	Revised Code of Washington
ROD	Record of Decision
ROI	region of influence
SC-GHG	social cost of greenhouse gases
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SITES	Sustainable Sites Initiative

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<b>Acronym</b>	<b>Definition</b>
SO <sub>2</sub>	sulfur dioxide
SPCC	spill prevention, control, and countermeasures
SR	State Route
STIP	State Transportation Improvement Program
SWPPP	stormwater pollution prevention plan
TC	Tourist Commercial
THPO	Tribal Historic Preservation Officer
TMDL	Total Maximum Daily Load
U.S.C	U.S. Code
USDA	U.S. Department of Agriculture
U.S. DOT	U.S. Department of Transportation
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tank
VOC	volatile organic compound
vpd	vehicles per day
vph	vehicles per hour
WAC	Washington Administrative Code
WDFW	Washington Department of Fish and Wildlife
WHO	World Health Organization
WNHP	Washington Natural Heritage Program
WOTUS	Waters of the U.S.
WRIA	Water Resource Inventory Area
WSDOT	Washington State Department of Transportation
WSS	Web Soil Survey

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## A.2 SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT (NHPA)

### A.2.1 GSA Letter Sent to Nooksack Tribal Chair (December 28, 2022) – Consultation Letter



GSA Northwest/Arctic Region

28 December 2022

RoseMary LaClair, Chair  
Nooksack Tribe  
5016 Deming Road  
Deming, WA 98244

VIA ELECTRONIC MAIL to: [tdelgado@nooksack-nsn.gov](mailto:tdelgado@nooksack-nsn.gov)

Re: Land Port of Entry Stations (LPOE) - Sumas, WA and Lynden, WA

Dear Chairwoman LaClair,

As part of the unique government-to-government relationship the US Government has with the Nooksack Tribe, we are contacting you as early as possible as we look to move forward with projects at the Lynden and Sumas LPOEs. On November 6, 2021, Congress passed the Bipartisan Infrastructure Law (BIL), which included funding for redevelopment of both LPOEs. A top priority for the LPOE program is to strengthen the government-to-government relationship with sovereign Tribal Nations. We understand that Tribal sovereignty and self-governance must be the cornerstones of federal Indian relations.

Both the Sumas and Lynden facilities were originally constructed in 1988 and do not adequately serve current demand. GSA proposes to replace the existing facilities to address multiple deficiencies and provide US Customs and Border Protection the opportunity to expand operations in future years. Given the close proximity and the similar timelines of the two projects, we have grouped them together for study purposes. Below we summarize previous cultural resource studies and outline the intended consultation efforts in compliance with cultural and environmental policies for this project. As we assess the timeline and next steps for this project, we wanted to give the Nooksack Tribe the opportunity to inform the Government if this process is sufficient or if further consultation or engagement efforts are desired.

#### Previous Cultural Resources Studies

GSA conducted background research within a half mile of the existing **Sumas** LPOE and found one previously recorded historic archaeological site. Seven cultural surveys were identified, one of which was conducted on the LPOE property (historic built-environment only). Six historic property inventories were identified within one half mile and one property listed in the National Register of Historic Places; the historic United States Border Station at Sumas. The Washington Department of Archaeology and Historic Preservation (DAHP) predictive model indicates a high probability for buried cultural resources within the vicinity.

GSA conducted background research within a half mile of the existing **Lynden** LPOE and found no previously recorded archaeology sites. Eleven cultural surveys were identified, three of which

U.S. General Services Administration  
1301 A Street  
Suite 610  
Tacoma, WA 98402  
[www.gsa.gov](http://www.gsa.gov)

1

were conducted on the LPOE property. There were also three historic property inventories located within one half mile to the south on Hwy 539. There are no properties listed in or determined eligible for the National Register of Historic Places within one half mile. The DAHP predictive model indicates a moderately low to moderate probability for buried cultural resources in the vicinity.

#### **Area of Potential Effects and Studies**

In January 2023 we will begin National Historic Preservation Act (NHPA) and National Environmental Policy Act (NEPA) studies, which we expect will take approximately 18-24 months to complete. A cultural resource survey will be conducted to examine impacts to places and sites that are culturally significant to the community. Our planned NEPA analysis will result in an Environmental Impact Statement (EIS), which typically includes an assessment of potential impacts to the environment for the proposed alternatives.

#### **Future Consultation**

We look forward to engaging in meaningful consultation with the Nooksack Tribe. If you would like to participate going forward, please let me know how we can effectively facilitate communication. If you have any questions, please don't hesitate to contact me at [kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov) or 253-666-0891.

Very Respectfully,

KIMBERLY  
GANT

Digitally signed by  
KIMBERLY GANT  
Date: 2022.12.28 13:51:56  
-08'00'

**Kimberly Gant**  
Regional Historic Preservation Officer  
U.S. General Services Administration  
Public Buildings Service  
Northwest Arctic Region 10PCE  
[kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov)

cc: Trevor Delgado, THPO, George Swanaset Jr, Nooksack Cultural Resources Director  
Richard Rachow - 10PCC Melissa Hibray - 10PCC Aaron Evanson - 10PCC  
Patrick Manning - 10PCC Amy Heusser - 10PQC Kim Johnson - 10PQC  
Rick Risso - 10PQC Beth Savage - PCAB Joan Brierton - PCAB , GSA

12/28/2022 Sumas and Lynden LPOE 2



Figure 1: Sumas Border Vicinity Map



Figure 2: Lynden Border Vicinity Map

12/28/2022 Sumas and Lynden LPOE 4

## A.2.2 GSA Letter Sent to Nooksack Tribal Chair (June 13, 2023) – Consultation Letter



GSA Northwest/Arctic Region

June 13, 2023

RoseMary LaClair, Chair  
Nooksack Tribe  
5016 Deming Road  
Deming, WA 98244

VIA ELECTRONIC MAIL to: [tdelgado@nooksack-nsn.gov](mailto:tdelgado@nooksack-nsn.gov)

Re: Land Port of Entry Stations (LPOE) - Lynden and Sumas, WA

Dear Chairwoman LaClair,

In December 2022 GSA sent a letter to inform you of our intent to expand the Land Port of Entry stations located in Lynden and Sumas, WA, and to invite you to consult on the projects. We did not receive a response to our letter; however, we realize it may not be possible or desirable to respond to each request. It is our intent to keep you informed of progress regarding cultural resource investigations at the sites. In accordance with 36 CFR 800.4 GSA has established the Area of Potential Effect (APE) for each site. The entire existing LPOE sites will be disturbed and the acquisition of property at each is anticipated. The APE for each includes all parcels that may be affected by ground disturbance. Given that the proposed outcome of the projects will not be a substantial change in size, context, use, or function, we propose to survey parcels upon which construction activities may occur. Initial survey activities will include literature review and an evaluation of standing structures. We do not anticipate subsurface testing at this time.

### Future Consultation

If you would like to participate going forward, please let me know how we can effectively facilitate communication. If you have any questions, please don't hesitate to contact me at [kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov) or 253-666-0891.

Very Respectfully,

**KIMBERLY GANT** Digitally signed by KIMBERLY  
GANT  
Date: 2023.06.14 11:17:52 -07'00'

Kimberly Gant  
Regional Historic Preservation Officer  
U.S. General Services Administration  
Public Buildings Service  
Northwest Arctic Region 10PCE  
[kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov)

cc: Trevor Delgado, THPO, George Swanaset Jr, Nooksack Cultural Resources Director  
Richard Rachow - 10PCC Patrick Manning - 10PCC Rick Risso - 10PQC Beth Savage - PCAB  
Joan Brierton - PCAB , GSA

U.S. General Services Administration  
1301 A Street  
Suite 610  
Tacoma, WA 98402  
[www.gsa.gov](http://www.gsa.gov)

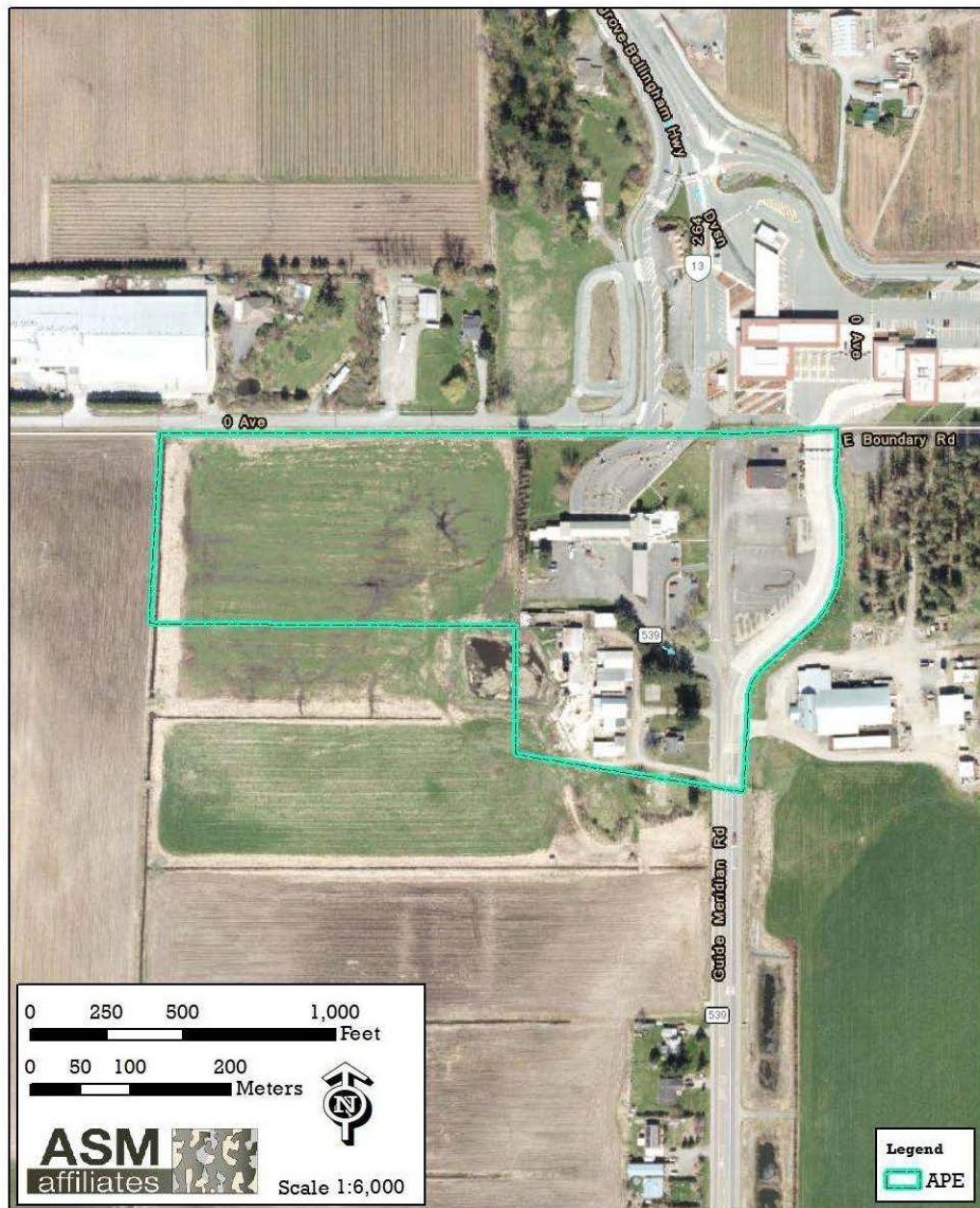


Figure 1: Lynden Border APE Map

6-13-23 Lynden and Sumas LPOE 2

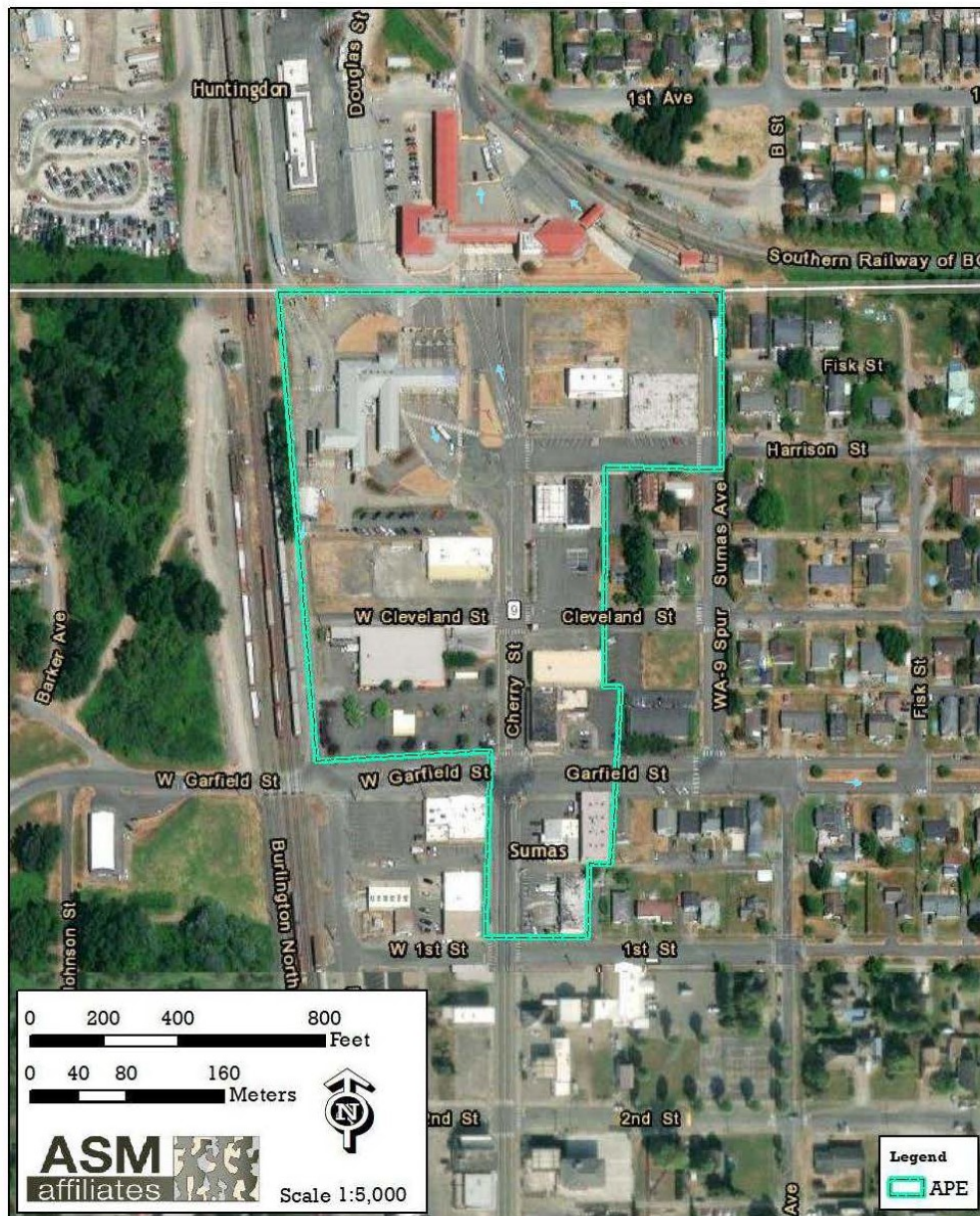


Figure 2: Sumas Border APE Map

### A.2.3 GSA Letter Sent to Colville Tribal Chairman (December 28, 2022) – Consultation Letter



Kimberly Gant - 10PCE <kimberly.gant@gsa.gov>

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#### Lynden and Sumas Land Port of Entry Projects

2 messages

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**Kimberly Gant - 10PCE** <kimberly.gant@gsa.gov> Wed, Dec 28, 2022 at 1:33 PM

To: andy.joseph@colvilletribes.com

Cc: guy.moura@colvilletribes.com

Bcc: Amy Heusser - 10PQC <amy.heusser@gsa.gov>, Beth Savage - PCAB <beth.savage@gsa.gov>, Aaron Evanson - 10PCC <david.evanson@gsa.gov>, Kim Johnson - 10PQC <kimberlym.johnson@gsa.gov>, Melissa Hibray - 10PCC <melissa.hibray@gsa.gov>, Patrick Manning - 10PCC <patrick.manning@gsa.gov>, Rick Rizzo - 10PQC <richard.rizzo@gsa.gov>, Richard Rachow - 10PCC <rick.rachow@gsa.gov>, Joan Brierton - PCAB <joan.brierton@gsa.gov>

Dear Chairman Joseph,  
I am writing to you today to introduce two additional GSA-managed projects at northern border stations. Please find our letter attached. We welcome your input now and of course going forward.

Respectfully,  
Kim Gant

--

**Kim Gant**

Regional Historic Preservation Officer (RHPO) and Regional Fine Arts Officer (RFAO)

GSA, PBS Northwest/Arctic Region

[kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov)

253-666-0891 Cell (preferred)

253-931-7092 Office

[HP IDIQ Project Request Form](#)

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 **Sumas\_Lynden Letter to Colville.pdf**  
270K

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**Guy Moura** <guy.moura@colvilletribes.com>  
To: Kimberly Gant - 10PCE <kimberly.gant@gsa.gov>

Mon, Oct 23, 2023 at 1:39 PM

No comment  
[Quoted text hidden]





GSA Northwest/Arctic Region

28 December 2022

The Honorable Chief Andy Joseph, Chair  
Confederated Tribes of the Colville Reservation  
PO Box 150  
Nespelem, WA 99155

VIA ELECTRONIC MAIL to: [andy.joseph@colvilletribes.com](mailto:andy.joseph@colvilletribes.com)

Re: Land Port of Entry Stations (LPOE) - Sumas, WA and Lynden, WA

Dear Chairman Joseph,

As part of the unique government-to-government relationship the US Government has with the Confederated Tribes of the Colville Reservation we are contacting you as early as possible as we look to move forward with projects at the Lynden and Sumas LPOEs. On November 6, 2021, Congress passed the Bipartisan Infrastructure Law (BIL), which included funding for redevelopment of both LPOEs. A top priority for the LPOE program is to strengthen the government-to-government relationship with sovereign Tribal Nations. We understand that Tribal sovereignty and self-governance must be the cornerstones of federal Indian relations.

Both the Sumas and Lynden facilities were originally constructed in 1988 and do not adequately serve current demand. GSA proposes to replace the existing facilities to address multiple deficiencies and provide US Customs and Border Protection the opportunity to expand operations in future years. Given the close proximity and the similar timelines of the two projects, we have grouped them together for study purposes. Below we summarize previous cultural resource studies and outline the intended consultation efforts in compliance with cultural and environmental policies for this project. As we assess the timeline and next steps for this project, we wanted to give the Colville Tribes the opportunity to inform the Government if this process is sufficient or if further consultation or engagement efforts are desired.

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[www.gsa.gov](http://www.gsa.gov)

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#### **Area of Potential Effects and Studies**

In January 2023 we will begin National Historic Preservation Act (NHPA) and National Environmental Policy Act (NEPA) studies, which we expect will take approximately 18-24 months to complete. A cultural resource survey will be conducted to examine impacts to places and sites that are culturally significant to the community. Our planned NEPA analysis will result in an Environmental Impact Statement (EIS), which typically includes an assessment of potential impacts to the environment for the proposed alternatives.

#### **Future Consultation**

We look forward to engaging in meaningful consultation with the Confederated Tribes of the Colville Reservation. If you would like to participate going forward, please let me know how we can effectively facilitate communication. If you have any questions, please don't hesitate to contact me at [kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov) or 253-666-0891.

Very Respectfully,

KIMBERLY  
GANT

Kimberly Gant

Regionally Historic Preservation Officer  
U.S. General Services Administration  
Public Buildings Service  
Northwest Arctic Region 10PCE  
[kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov)

Digitally signed by  
KIMBERLY GANT  
Date: 2022.12.28 13:28:11  
-08'00'

cc: Guy Moura, THPO

Richard Rachow - 10PCC Melissa Hibray - 10PCC Aaron Evanson - 10PCC  
Patrick Manning - 10PCC Amy Heusser - 10PQC Kim Johnson - 10PQC  
Rick Rizzo - 10PQC Beth Savage - PCAB Joan Brierton - PCAB

12/28/2022 Sumas and Lynden LPOE 2



Figure 1: Sumas Border Vicinity Map

12/28/2022 Sumas and Lynden LPOE 3



Figure 2: Lynden Border Vicinity Map

12/28/2022 Sumas and Lynden LPOE 4

## A.2.4 GSA Letter Sent to Lummi Nation Chairman (December 28, 2022) – Consultation Letter



GSA Northwest/Arctic Region

28 December 2022

The Honorable Anthony Hillaire, Chair  
Lummi Nation  
2665 Kwina Road  
Bellingham, WA 98226

VIA ELECTRONIC MAIL to: [anthonyH@lummi-nsn.gov](mailto:anthonyH@lummi-nsn.gov)

Re: Land Port of Entry Stations (LPOE) - Sumas, WA and Lynden, WA

Dear Chairman Hillaire,

As part of the unique government-to-government relationship the US Government has with the Lummi Nation we are contacting you as early as possible as we look to move forward with projects at the Lynden and Sumas LPOEs. On November 6, 2021, Congress passed the Bipartisan Infrastructure Law (BIL), which included funding for redevelopment of both LPOEs. A top priority for the LPOE program is to strengthen the government-to-government relationship with sovereign Tribal Nations. We understand that Tribal sovereignty and self-governance must be the cornerstones of federal Indian relations.

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Suite 610  
Tacoma, WA 98402  
[www.gsa.gov](http://www.gsa.gov)

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#### **Future Consultation**

We look forward to engaging in meaningful consultation with the Lummi Nation. If you would like to participate going forward, please let me know how we can effectively facilitate communication. If you have any questions, please don't hesitate to contact me at [kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov) or 253-666-0891.

Very Respectfully,

KIMBERLY  
GANT

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KIMBERLY GANT  
Date: 2022.12.28 10:09:40  
-08'00'

Kimberly Gant  
Regional Historic Preservation Officer  
U.S. General Services Administration  
Public Buildings Service  
Northwest Arctic Region 10PCE  
[kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov)

cc: Lena A. Tso , THPO  
Richard Rachow - 10PCC Melissa Hibray - 10PCC Aaron Evanson - 10PCC  
Patrick Manning - 10PCC Amy Heusser - 10PQC Kim Johnson - 10PQC  
Rick Risso - 10PQC Beth Savage - PCAB Joan Brierton - PCAB

12/28/2022 Sumas and Lynden LPOE 2



Figure 1: Sumas Border Vicinity Map

12/28/2022 Sumas and Lynden LPOE 3



Figure 2: Lynden Border Vicinity Map

12/28/2022 Sumas and Lynden LPOE 4



## A.2.5 GSA Initial SHPO Sumas Consultation Letter (December 20, 2022)



GSA Northwest/Arctic Region

December 20, 2022

Allyson Brooks, PhD  
Director, State Historic Preservation Officer  
Washington State Department of Archaeology & Historic Preservation  
1110 Capitol Way S, Suite 30  
Olympia, WA 98504

VIA ELECTRONIC MAIL to 106@dahp.wa.gov

Re: 2022-12-08012 - Sumas Land Port of Entry (LPOE) Expansion, Whatcom County

Dear Dr. Brooks,

The U.S. General Services Administration (GSA) is proposing to develop the Land Port of Entry (LPOE) property at Sumas, WA. On November 6, 2021, Congress passed the Bipartisan Infrastructure Law (BIL), also known as the Infrastructure Investment and Jobs Act (IIJA). On November 15, 2021, the President signed Executive Order (EO) 14052 "Implementation of the Infrastructure Investment and Jobs Act." Finally on December 13, 2021, the President signed EO 14508 "Transforming Federal Customer Experience and Service Delivery To Rebuild Trust in Government." On February 25, 2022, President Biden and GSA announced the list of major LPOE projects funded by the BIL. This list includes the Sumas LPOE.

GSA proposes to replace the existing LPOE facilities to address multiple deficiencies. In 2018, GSA and CBP completed a Feasibility Study to provide conceptual designs that intend to correct deficiencies at the property and bring the facilities up to LPOE Design Standards. The study identified a preferred alternative. GSA is currently undertaking a Program Development Study (PDS) to validate the preferred alternative and your office will be consulted as part of the study.

### Previous Cultural Resources Studies

The buildings on the current Port property were constructed in 1990. GSA conducted background research within a half mile of the existing LPOE and found one previously recorded historic archaeological site. Seven cultural surveys were identified, one of which was conducted on the LPOE property (historic built-environment only (NADB 1351431); no archaeological survey has been conducted on the property). Six historic property inventories were identified within one half mile and one property listed in the National Register of Historic Places; the historic United States Border Station at Sumas. The DAHP predictive model indicates a high probability for buried cultural resources within the vicinity.

### Area of Potential Effects and Studies

The APE has not been defined, but a vicinity map is provided below (Figure 1). The entire existing site will be disturbed and the acquisition of approximately six acres of commercial property to the south and east is anticipated. As identification of historic properties efforts commence under Section 106 and the National Environmental Policy Act (NEPA), GSA and our NEPA Cultural Resources consultant will identify additional layers of APE, including but not

limited to direct effects, visual effects, audible effects, and other indirect effects as part of their cultural resources reconnaissance and assessments. It is expected that NEPA studies will commence in early January, and a final Environmental Impact Statement will be completed and available for review in 2023-2024.

### **Future Consultation**

GSA has established that the project is an undertaking in accordance with 36 CFR 800, and invites you to participate in consultation. Simultaneous with this letter, GSA is reaching out to Indian Tribes and other parties who may be interested in this undertaking. If you have any questions, please contact me at [kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov) or 253-666-0891.

Sincerely,

 Digitally signed by  
KIMBERLY GANT  
Date: 2022.12.21  
11:20:09 -08'00'

**Kimberly Gant**  
Regional Historic Preservation Officer  
U.S. General Services Administration  
Public Buildings Service  
Northwest Arctic Region 10PCE  
[kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov)

cc: Amy Heusser - 10PQC Patrick Manning - 10PCC Aaron Evanson - 10PCC  
Melissa Hibray - 10PCC Kim Johnson - 10PQC Richard Rachow - 10PCC  
Rick Risso - 10PQC , Beth Savage - PCAB , Joan Brierton - PCAB , GSA

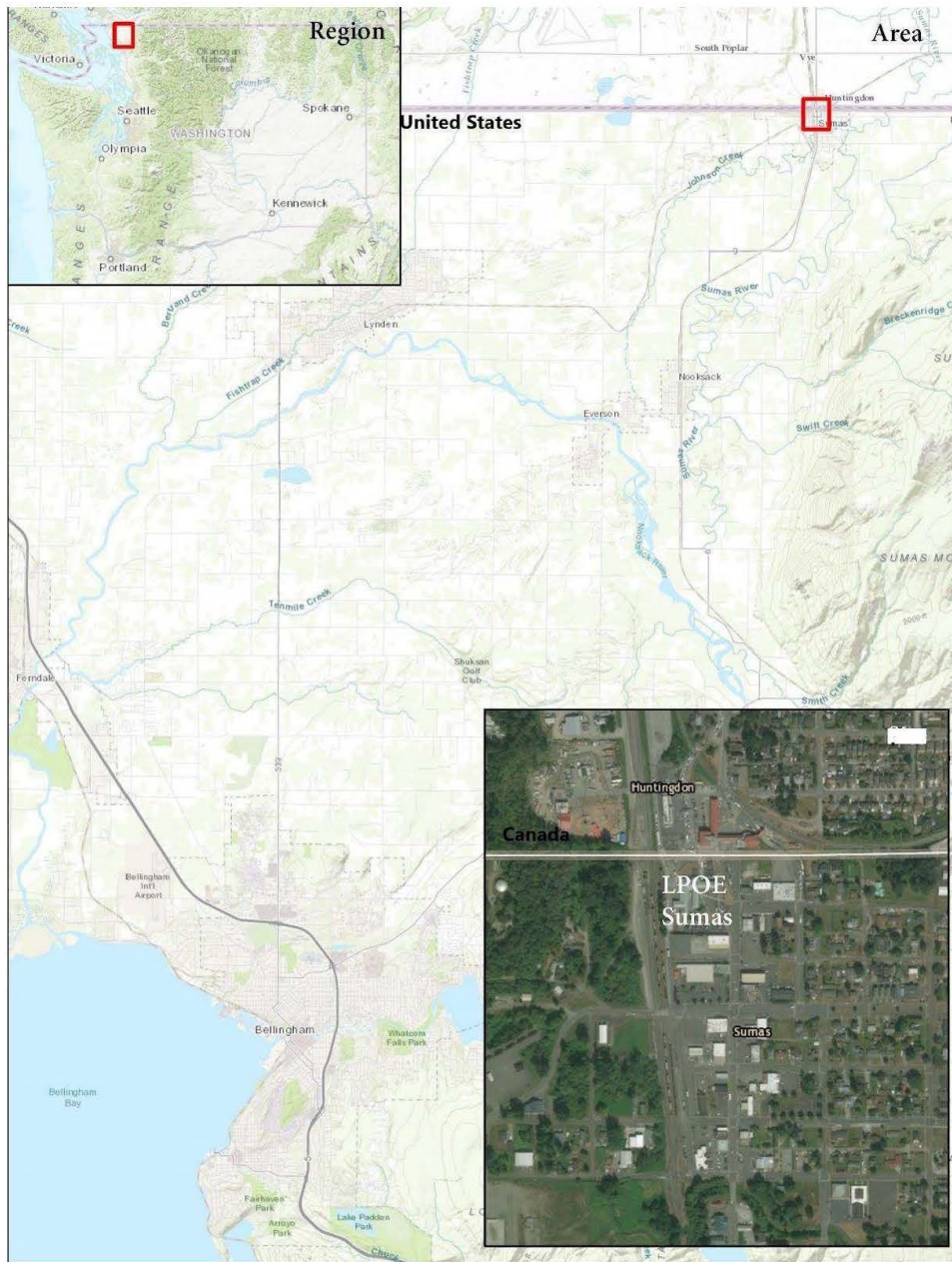


Figure 1: Sumas LPOE Vicinity Map

## A.2.6 SHPO Response – Sumas Consultation Initial Letter (December 21, 2022)



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

December 21, 2022

Kimberly Gant  
GSA NW/Arctic Region  
1301 A Street, Suite 610  
Tacoma, Washington 98402

Re: Sumas Land Port of Entry Expansion Project  
Log No.: 2022-12-08012-GSA

Dear Kimberly Gant:

Thank you for contacting our department. We have reviewed the materials you provided for the proposed *Sumas Land Port of Entry Expansion Project* at Blaine, Whatcom County, Washington.

We concur with the proposed generalized Area of Potential Effect (APE) detailed in your letter and illustrated in the attached figures. We look forward to further consultations on the definition of the APE.

We also look forward to receiving the results of your review, consultations with the concerned tribes, and the Determination of Effect.

We would also appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in compliance with the Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations 36CFR800.4.

Should additional information become available, our assessment may be revised, including information regarding historic properties that have not yet been identified. Thank you for the opportunity to comment and we look forward to receiving the report on the results of your investigations.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rob Whitlam', with a long horizontal flourish extending to the right.

Robert G. Whitlam, Ph.D.  
State Archaeologist  
(360) 890-2615  
email: [rob.whitlam@dahp.wa.gov](mailto:rob.whitlam@dahp.wa.gov)

State of Washington • Department of Archaeology & Historic Preservation  
P.O. Box 48343 • Olympia, Washington 98504-8343 • (360) 586-3065  
[www.dahp.wa.gov](http://www.dahp.wa.gov)



## A.2.7 GSA Initial SHPO Lynden Consultation Letter (December 21, 2022)



GSA Northwest/Arctic Region

December 21, 2022

Allyson Brooks, PhD  
Director, State Historic Preservation Officer  
Washington State Department of Archaeology & Historic Preservation  
1110 Capitol Way S, Suite 30  
Olympia, WA 98504

VIA ELECTRONIC MAIL to [rob.whitlam@dahp.wa.gov](mailto:rob.whitlam@dahp.wa.gov)

Re: 2022-12-07997 - Lynden Land Port of Entry (LPOE) Expansion, Whatcom County

Dear Dr. Brooks,

The Kenneth Ward Land Port of Entry, located in Lynden WA, serves the border communities of Lynden and Aldergrove, British Columbia. The Port currently operates 16-hrs a day, seven days a week, and processes POVs, buses, and pedestrians. The Port also processes a limited amount of commercial traffic under a pre-approved permit process. The US General Services Administration (GSA) proposes to expand the Port's operational efficiency and capability by adding additional POV and commercial lanes.

GSA has established that the project is an undertaking, as defined in 36 CFR 800.16(y), with the potential to affect historic properties, and invites you to participate in the consultation. The APE has not been defined, but a vicinity map is provided below (Figure 1). The majority of work will be conducted within the existing Port property, but expansion into the immediate surrounding area is also anticipated.

The buildings on the Port property were constructed in 1987. GSA conducted background research within a half mile of the existing LPOE and found no previously recorded archaeological sites. Eleven cultural surveys were identified, three of which were conducted on the LPOE property. There were also three historic property inventories located within one half mile to the south on Hwy 539. There are no properties listed in or determined eligible for the National Register of Historic Places within one half mile. The DAHP predictive model indicates a moderately low to moderate probability for buried cultural resources in the vicinity.

Simultaneous with this letter, GSA is reaching out to Indian Tribes and other parties who may be interested in this undertaking. We will also be conducting a combined Environmental Assessment for the Lynden and Sumas projects in accordance with the National Environmental Policy Act. If you have any questions, please contact me at [kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov) or 253-666-0891.

Sincerely,

KIMBERLY GANT

Digitally signed by KIMBERLY  
GANT  
Date: 2022.12.21 12:17:46  
-08'00'

**Kimberly Gant**  
**Regional Historic Preservation Officer**  
**U.S. General Services Administration**  
**Public Buildings Service**  
**Northwest Arctic Region 10PCE**  
[kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov)

cc: Amy Heusser - 10PQC Patrick Manning - 10PCC Melissa Hibray - 10PCC  
Kim Johnson - 10PQC Richard Rachow - 10PCC Rick Risso - 10PQC  
Aaron Evanson - 10PCC Beth Savage - PCAB Joan Brierton - PCAB , GSA



Figure 1: Lynden LPOE Vicinity Map

## A.2.8 SHPO Response – Sumas Consultation Initial Letter (December 21, 2022)



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

December 21, 2022

Kimberly Gant  
GSA NW/Arctic Region  
1301 A Street, Suite 610  
Tacoma, Washington 98402

Re: Lynden Land Port of Entry Expansion Project  
Log No.: 2022-12-07997-GSA

Dear Kimberly Gant;

Thank you for contacting our department. We have reviewed the materials you provided for the proposed *Lynden Land Port of Entry Expansion Project* at Lynden, Whatcom County, Washington.

We concur with the proposed generalized Area of Potential Effect (APE) detailed in your letter and illustrated in the attached figures. We look forward to further consultations on the definition of the APE.

We also look forward to receiving the results of your review, consultations with the concerned tribes, and the Determination of Effect.

We would also appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in compliance with the Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations 36CFR800.4.

Should additional information become available, our assessment may be revised, including information regarding historic properties that have not yet been identified. Thank you for the opportunity to comment and we look forward to receiving the report on the results of your investigations.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rob Whitlam', with a long horizontal flourish extending to the right.

Robert G. Whitlam, Ph.D.  
State Archaeologist  
(360) 890-2615  
email: [rob.whitlam@dahp.wa.gov](mailto:rob.whitlam@dahp.wa.gov)





## A.2.9 GSA to SHPO Sumas APE Letter (June 9, 2023)



GSA Northwest/Arctic Region

June 9, 2023

Allyson Brooks, PhD  
Director, State Historic Preservation Officer  
Washington State Department of Archaeology & Historic Preservation  
1110 Capitol Way S, Suite 30  
Olympia, WA 98504

VIA ELECTRONIC MAIL to 106@dahp.wa.gov

Re: 2022-12-08012 - Sumas Land Port of Entry (LPOE) Expansion, Whatcom County

Dear Dr. Brooks,

The U.S. General Services Administration (GSA) is proposing to develop the Land Port of Entry (LPOE) property at Sumas, WA. On November 6, 2021, Congress passed the Bipartisan Infrastructure Law (BIL), also known as the Infrastructure Investment and Jobs Act (IIJA). On November 15, 2021, the President signed Executive Order (EO) 14052 "Implementation of the Infrastructure Investment and Jobs Act." Finally on December 13, 2021, the President signed EO 14508 "Transforming Federal Customer Experience and Service Delivery To Rebuild Trust in Government." On February 25, 2022, President Biden and GSA announced the list of major LPOE projects funded by the BIL. This list includes the Sumas LPOE.

### Area of Potential Effects and Survey Methodology

In accordance with 36 CFR 800.4 GSA has established the APE and survey methodology for your review and comment. The entire existing LPOE site will be disturbed and the acquisition of approximately six acres of commercial property to the south and east is anticipated. The APE includes all parcels that may be affected by ground disturbance. The National Register-listed Sumas LPOE building will not be affected. Given that the proposed outcome of the project will not be a substantial change in size, context, use, or function, we propose to survey parcels upon which construction activities may occur. Initial survey activities will include literature review and an evaluation of standing structures.

Concurrent with our initial letter to your office, GSA contacted the Lummi and Nooksack tribes and invited them to consult on this project. To date, neither has responded. However, GSA will provide the APE and survey methodology to tribes for review and comment and will forward any responses that we receive to your office.

We look forward to receiving your response. If you have any questions, please contact me at [kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov) or 253-666-0891.

Sincerely,

**KIMBERLY GANT** Digitally signed by KIMBERLY GANT  
Date: 2023.06.13 12:49:16 -07'00'

Kimberly Gant  
Regional Historic Preservation Officer  
U.S. General Services Administration  
Public Buildings Service  
Northwest Arctic Region 10PCE  
[kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov)

cc: Patrick Manning - 10PCC Richard Rachow - 10PCC Rick Risso - 10PQC , Beth Savage - PCAB ,  
Joan Brierton - PCAB , GSA

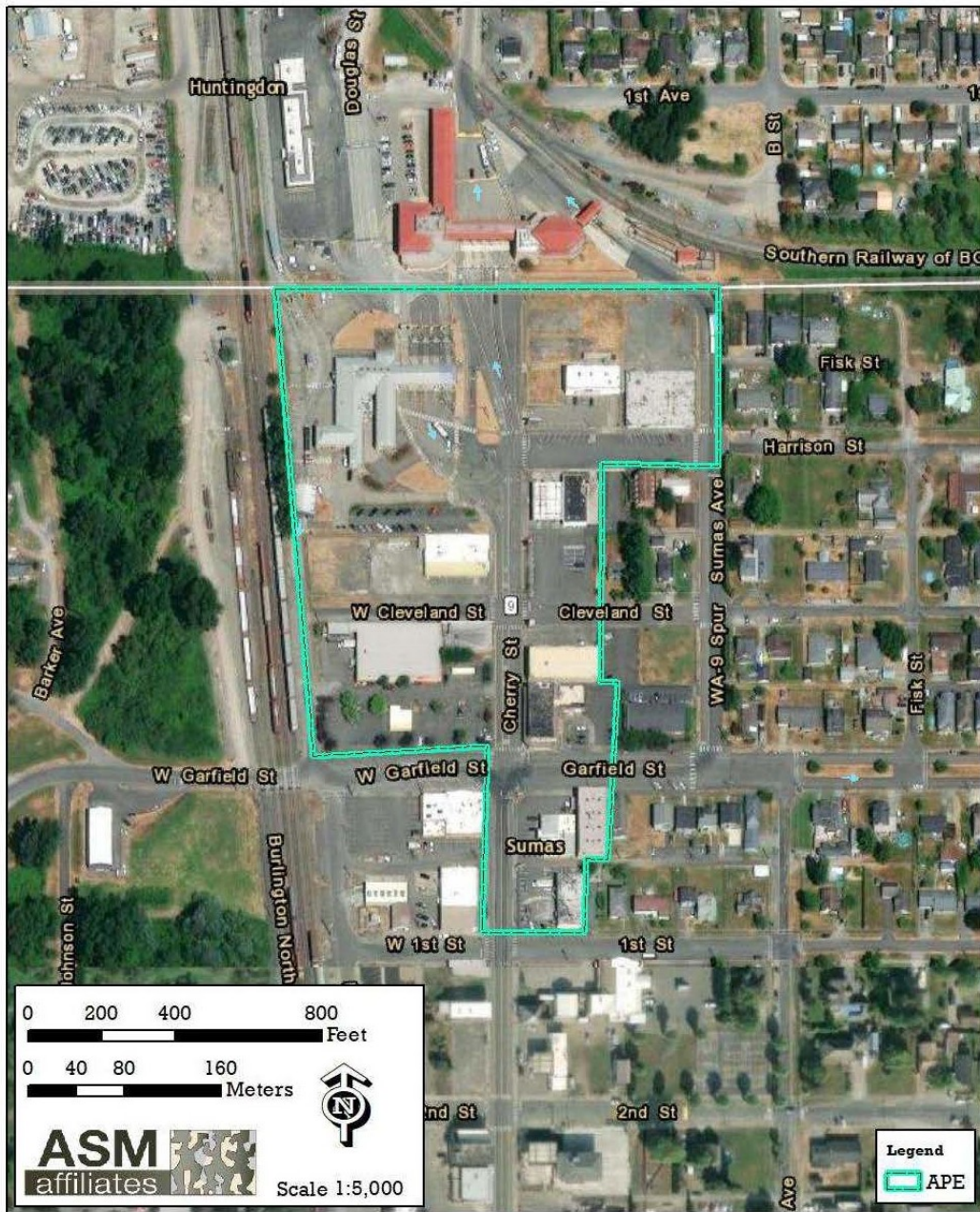


Figure 1: Sumas LPOE APE

## A.2.10 GSA to SHPO Lynden APE Letter (June 9, 2023)



GSA Northwest/Arctic Region

June 9, 2023

Allyson Brooks, PhD  
Director, State Historic Preservation Officer  
Washington State Department of Archaeology & Historic Preservation  
1110 Capitol Way S, Suite 30  
Olympia, WA 98504

VIA ELECTRONIC MAIL to [106@dahp.wa.gov](mailto:106@dahp.wa.gov)

Re: 2022-12-07997 - Lynden Land Port of Entry (LPOE) Expansion, Whatcom County

Dear Dr. Brooks,

The Kenneth Ward Land Port of Entry, located in Lynden WA, serves the border communities of Lynden and Aldergrove, British Columbia. The Port currently operates 16-hrs a day, seven days a week, and processes POVs, buses, and pedestrians. The Port also processes a limited amount of commercial traffic under a pre-approved permit process. The US General Services Administration (GSA) proposes to expand the Port's operational efficiency and capability by adding additional POV and commercial lanes.

### Area of Potential Effects and Survey Methodology

In accordance with 36 CFR 800.4 GSA has established the APE and survey methodology for your review and comment. The entire existing LPOE site will be disturbed and the acquisition of property to the south and west is anticipated. The APE includes all parcels that may be affected by ground disturbance. Given that the proposed outcome of the project will not be a substantial change in size, context, use, or function, we propose to survey parcels upon which construction activities may occur. Initial survey activities will include literature review and an evaluation of standing structures.

Concurrent with our initial letter to your office, GSA contacted the Lummi and Nooksack tribes and invited them to consult on this project. To date, neither has responded. However, GSA will provide the APE and survey methodology to them for review and comment and will forward any responses that we receive to your office.

We look forward to receiving your response. If you have any questions, please contact me at [kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov) or 253-666-0891.

Sincerely,

**KIMBERLY GANT** Digitally signed by KIMBERLY GANT  
Date: 2023.06.13 12:36:48 -07'00'

Kimberly Gant  
Regional Historic Preservation Officer  
U.S. General Services Administration  
Public Buildings Service  
Northwest Arctic Region 10PCE  
[kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov)

cc: Patrick Manning - 10PCC Richard Rachow - 10PCC Rick Risso - 10PQC , Beth Savage - PCAB ,  
Joan Brierton - PCAB , GSA

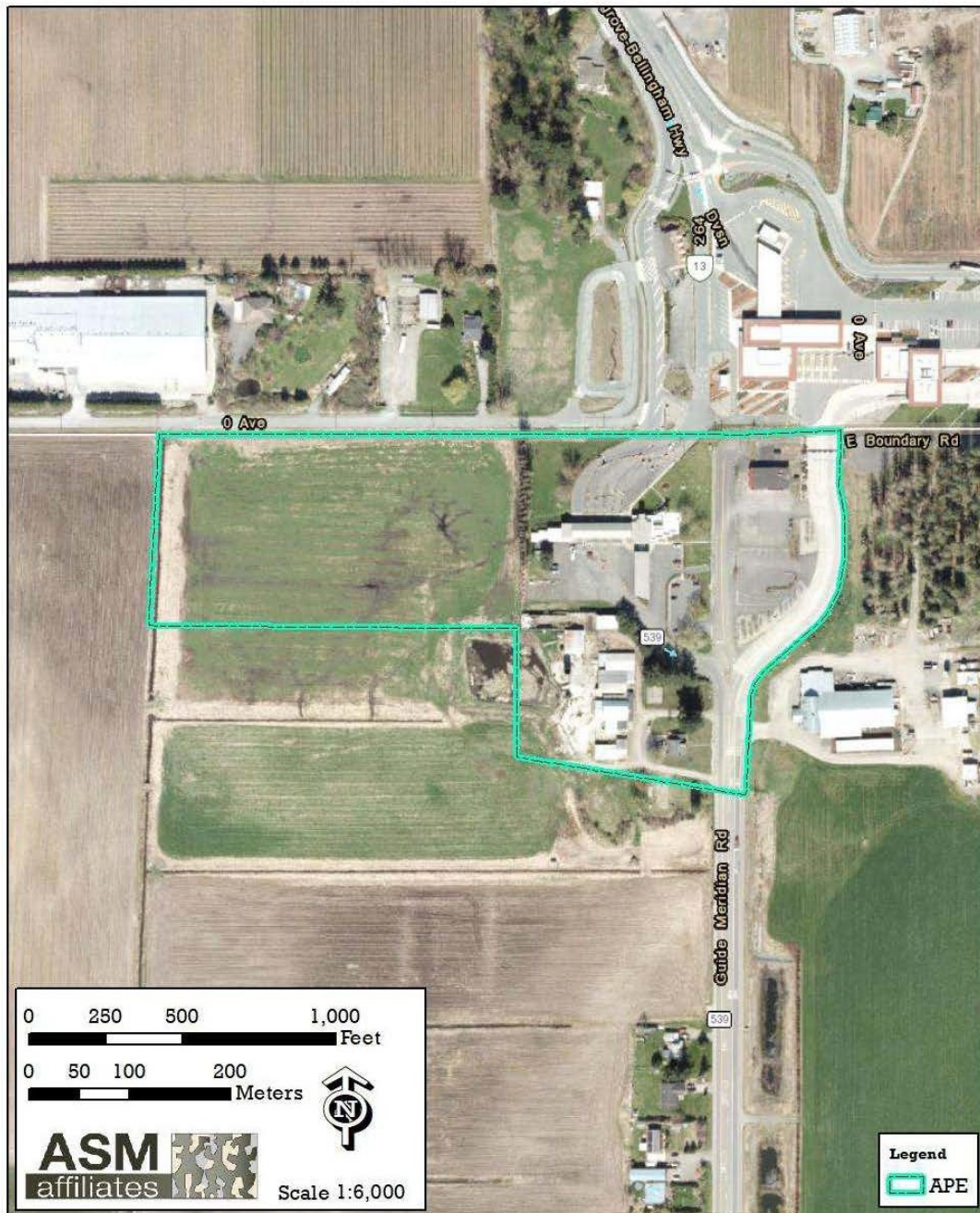


Figure 1: Lynden LPOE APE

## A.2.11 SHPO Response to Sumas APE Letter (June 14, 2023)



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

June 14, 2023

Kimberly Gant  
GSA NW/Arctic Region  
1301 A Street, Suite 610  
Tacoma, Washington 98402

Re: Sumas Land Port of Entry Expansion Project  
Log No.: 2022-12-08012-GSA

Dear Kimberly Gant;

Thank you for contacting our department. We have reviewed the materials you provided for the proposed *Sumas Land Port of Entry Expansion Project* at Sumas, Whatcom County, Washington.

We concur with the proposed generalized Area of Potential Effect (APE) detailed in your letter and illustrated in the attached figures.

We also look forward to receiving the results of your review, the professional cultural resources review, consultations with the concerned tribes, and the Determination of Effect.

We would also appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in compliance with the Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations 36CFR800.4.

Should additional information become available, our assessment may be revised, including information regarding historic properties that have not yet been identified. Thank you for the opportunity to comment and we look forward to receiving the report on the results of your investigations.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Whitlam', with a long horizontal flourish extending to the right.

Robert G. Whitlam, Ph.D.  
State Archaeologist  
(360) 890-2615  
email: [rob.whitlam@dahp.wa.gov](mailto:rob.whitlam@dahp.wa.gov)

State of Washington • Department of Archaeology & Historic Preservation  
P.O. Box 48343 • Olympia, Washington 98504-8343 • (360) 586-3065  
[www.dahp.wa.gov](http://www.dahp.wa.gov)



## A.2.12 SHPO Response to Lynden APE Letter (June 14, 2023)



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

June 14, 2023

Kimberly Gant  
GSA NW/Arctic Region  
1301 A Street, Suite 610  
Tacoma, Washington 98402

Re: Lynden Land Port of Entry Expansion Project  
Log No.: 2022-12-07997-GSA

Dear Kimberly Gant,

Thank you for contacting our department. We have reviewed the materials you provided for the proposed *Lynden Land Port of Entry Expansion Project* at Lynden, Whatcom County, Washington.

We concur with the proposed generalized Area of Potential Effect (APE) detailed in your letter and illustrated in the attached figures.

We also look forward to receiving the results of your review, the professional cultural resources review, consultations with the concerned tribes, and the Determination of Effect.

We would also appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in compliance with the Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations 36CFR800.4.

Should additional information become available, our assessment may be revised, including information regarding historic properties that have not yet been identified. Thank you for the opportunity to comment and we look forward to receiving the report on the results of your investigations.

Sincerely,

Robert G. Whitlam, Ph.D.  
State Archaeologist  
(360) 890-2615  
email: [rob.whitlam@dahp.wa.gov](mailto:rob.whitlam@dahp.wa.gov)

State of Washington • Department of Archaeology & Historic Preservation  
P.O. Box 48343 • Olympia, Washington 98504-8343 • (360) 586-3065  
[www.dahp.wa.gov](http://www.dahp.wa.gov)



## A.2.13 GSA to SHPO Sumas Historic Built Property Letter (November 14, 2023)



GSA Northwest/Arctic Region

14 November 2023

Dr. Rob Whitlam  
State Archaeologist  
Washington State Department of Archaeology & Historic Preservation  
1110 Capitol Way S, Suite 30  
Olympia, WA 98504

VIA ELECTRONIC MAIL to [rob.whitlam@dahp.wa.gov](mailto:rob.whitlam@dahp.wa.gov)

Re: 2022-12-08012 - Sumas Land Port of Entry Modernization, Whatcom County

Dear Dr. Whitlam,

In accordance with 36 CFR 800.4 the U.S. General Services Administration (GSA) has conducted a literature review and survey of the historic built environment for the above-referenced project. The survey results illustrate that there are no historic built properties within the APE and we request concurrence with this determination. In order to determine whether there are any subsurface historic properties, GSA will conduct an archaeological survey in the coming months. We will provide the results and our determination of effect following the survey.

The report and historic property inventory forms have been submitted in Wisaard. If you have any questions, please contact me at [kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov) or 253-666-0891.

Sincerely,

**KIMBERLY GANT**

Digitally signed by KIMBERLY  
GANT  
Date: 2023.11.14 14:45:03 -08'00'

Kimberly Gant, MSHP  
Regional Historic Preservation Officer  
U.S. General Services Administration  
Public Buildings Service  
Northwest Arctic Region 10PCE

U.S. General Services Administration  
1301 A Street  
Suite 610  
Tacoma, WA 98402  
[www.gsa.gov](http://www.gsa.gov)

## A.2.14 GSA to SHPO Lynden Historic Built Property Letter (November 14, 2023)



GSA Northwest/Arctic Region

14 November 2023

Dr. Rob Whitlam  
State Archaeologist  
Washington State Department of Archaeology & Historic Preservation  
1110 Capitol Way S, Suite 30  
Olympia, WA 98504

VIA ELECTRONIC MAIL to [rob.whitlam@dahp.wa.gov](mailto:rob.whitlam@dahp.wa.gov)

Re: 2022-12-07997 - Lynden Land Port of Entry Modernization, Whatcom County

Dear Dr. Whitlam,

In accordance with 36 CFR 800.4 the U.S. General Services Administration (GSA) has conducted a literature review and survey of the historic built environment for the above-referenced project. The survey results illustrate that there are no historic built properties within the APE and we request concurrence with this determination. In order to determine whether there are any subsurface historic properties, GSA will conduct an archaeological survey in the coming months. We will provide the results and our determination of effect following the survey.

The report and historic property inventory forms have been submitted in Wisaard. If you have any questions, please contact me at [kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov) or 253-666-0891.

Sincerely,

**KIMBERLY GANT**

Digitally signed by KIMBERLY  
GANT  
Date: 2023.11.14 14:54:38 -08'00'

Kimberly Gant, MSHP  
Regional Historic Preservation Officer  
U.S. General Services Administration  
Public Buildings Service  
Northwest Arctic Region 10PCE

U.S. General Services Administration  
1301 A Street  
Suite 610  
Tacoma, WA 98402  
[www.gsa.gov](http://www.gsa.gov)



## A.2.15 SHPO Sumas Determined Not Eligible Letter (November 15, 2023)



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

November 15, 2023

Kimberly Gant  
Regional Historic Preservation Officer  
US General Services Administration  
1301 A Street, Ste 610  
Tacoma, WA 98402

In future correspondence please refer to:  
Project Tracking Code: 2022-12-08012  
Property: Sumas Land Port of Entry Project  
Re: Determined Not Eligible

Dear Kimberly Gant:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. This action has been reviewed on behalf of the State Historic Preservation Officer (SHPO) under provisions of Governor's Executive Order 21-02. Our review is based upon documentation provided in your submittal.

It is our opinion that the following resources are not eligible for listing in the National Register of Historic Places:

- Property ID: 732162 Sumas American Legion
- Property ID: 732167 Barkerville Tavern
- Property ID: 732168 Lynden Department Store
- Property ID: 732171 B&B Border Inn
- Property ID: 732172 B&B Pub and Grub
- Property ID: 732173 Package Express
- Property ID: 732174 Basil's Thai

We look forward to further consultation regarding your determination of the project impact on National Register listed and/or eligible resources in the area of potential effect (APE) based on the archaeological survey. Please provide us any correspondence or comments from concerned tribes and other parties that you receive as you consult under the Governor's Executive Order 21-02 and the survey report when it is available. Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me.

Sincerely,

Maddie Levesque, M.A.  
Architectural Historian  
Maddie.Levesque@dahp.wa.gov

State of Washington • Department of Archaeology & Historic Preservation  
P.O. Box 48343 • Olympia, Washington 98504-8343 • (360) 586-3065  
www.dahp.wa.gov



## A.2.16 SHPO Lynden More Information Needed Letter (November 15, 2023)



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

November 15, 2023

Kimberly Gant  
Regional Historic Preservation Officer  
US General Services Administration

In future correspondence please refer to:  
Project Tracking Code: 2022-12-07997  
Property: Lynden Land Port of Entry Project  
Re: More Information Needed

Dear Kimberly Gant:

Thank you for contacting the Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. This action has been reviewed on behalf of the State Historic Preservation Office (SHPO) under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation provided in your submittal.

In order to complete our review, we request the following information be provided to our office:

- Please create separate HPis for each building associated with the residence. There appears to be a few agricultural outbuildings along with the residence. As stated within the WA Standards for Cultural Resource Reporting, each building/structure needs its own HPI.

Also, we appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult for this project. Our comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in conformance with Section 106.

Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me.

Sincerely,

Maddie Levesque, M.A  
Architectural Historian  
(360) 819-7203  
Maddie.Levesque@dahp.wa.gov

State of Washington • Department of Archaeology & Historic Preservation  
P.O. Box 48343 • Olympia, Washington 98504-8343 • (360) 586-3065  
www.dahp.wa.gov



## A.2.17 SHPO Lynden Determined Not Eligible Letter (November 21, 2023)



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

November 21, 2023

Kimberly Gant  
Regional Historic Preservation Officer  
US General Services Administration  
1301 A Street, Ste 610  
Tacoma, WA98402

In future correspondence please refer to:  
Project Tracking Code: 2022-12-07997  
Property: Lynden Land Port of Entry Project  
Re: Not Eligible for the National Register

Dear Kimberly Gant:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. This action has been reviewed on behalf of the State Historic Preservation Office (SHPO) under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation provided in your submittal.

First, we concur that the following properties are not eligible for listing in the National Register of Historic Places:

Property ID: 666933 Residence at 9901 Guide Meridian Rd, Lynden, WA 98264  
Property ID: 732281 Shed/Garage at 9901 Guide Meridian Rd, Lynden, WA, 98264  
Property ID: 732283 Barn at 9901 Guide Meridian Rd, Lynden, WA, 98264  
Property ID: 732284 Loafing Shed (North) at 9901 Guide Meridian Rd, Lynden, WA, 98264  
Property ID: 732285 Loafing Shed (South) at 9901 Guide Meridian Rd, Lynden, WA, 98264  
Property ID: 732286 Silo at 9901 Guide Meridian Rd, Lynden, WA, 98264

We look forward to further consultation regarding the determination of the project effect on cultural resources in the area of potential effect (APE) after receiving the archaeology report. Please provide us any correspondence or comments from concerned tribes and other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4), and the survey report when it is available. Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me.

Sincerely,

Maddie Levesque, M.A.  
Architectural Historian

State of Washington • Department of Archaeology & Historic Preservation  
P.O. Box 48343 • Olympia, Washington 98504-8343 • (360) 586-3065  
www.dahp.wa.gov



## A.2.18 GSA to SHPO Lynden and Sumas Phase I Archaeological Survey Letter (May 31, 2024)



GSA Northwest/Arctic Region

31 May 2024

Dr. Rob Whittam  
State Archaeologist  
Washington State Department of Archaeology & Historic Preservation  
1110 Capitol Way S, Suite 30  
Olympia, WA 98504

VIA ELECTRONIC MAIL to [rob.whittam@dahp.wa.gov](mailto:rob.whittam@dahp.wa.gov); [108@dahp.wa.gov](mailto:108@dahp.wa.gov)

Re: 2022-12-07997 & 2022-12-08012 - Lynden & Sumas Land Port of Entry Modernization,  
Whatcom County

Dear Dr. Whittam,

In accordance with 36 CFR 800.4 the U.S. General Services Administration (GSA) has conducted a Phase I archaeology field survey of the APEs for the Lynden and Sumas LPOE Modernization projects. No cultural resources were discovered during the survey. GSA has determined that there are no historic properties present within the APEs and we request your concurrence with this determination. Although it appears unlikely that we will uncover any cultural resources during project activities, we intend to operate under an Inadvertent Discovery Plan (IDP; attached).

The report titled *Cultural Resources Technical Addendum for the Kenneth G. Ward (Lynden) and Sumas Land Ports of Entry (LPOE) Modernization* has been submitted in Wisard. If you have any questions, please contact me at [kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov) or 253-886-0881.

Sincerely,

**KIMBERLY GANT** Digitally signed by KIMBERLY GANT  
Date: 2024.05.31 08:55:21 -0700

Kimberly Gant, MSHP  
Regional Historic Preservation Officer  
U.S. General Services Administration  
Public Buildings Service  
Northwest Arctic Region 10PCE

cc: Pat Manning, Marshall Popkin

## A.2.19 SHPO Response to Lynden and Sumas Phase I Archaeological Survey Letter (June 3, 2024)



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

June 3, 2024

Kimberly Gant  
GSA NW/Arctic Region  
1301 A Street, Ste 610  
Tacoma, Washington 98402

Re: Kenneth G. Ward (Lynden) and Sumas Land Ports of Entry (LPOE)  
Modernization and Expansion Project  
Log No.: 2022-12-07997 & 08012-GSA

Dear Kimberly Gant;

Thank you for contacting our department. We have reviewed the information you provided for the proposed *Kenneth G. Ward (Lynden) and Sumas Land Ports of Entry (LPOE) Modernization and Expansion Project*, Whatcom County, Washington.

We concur with the Determination of No Historic Properties Affected with the stipulation for an unanticipated find plan.

We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

In the event that archaeological or historic materials are found during project activities, work in the immediate vicinity should be discontinued, the area secured, and the concerned tribes and this department notified

These comments are based on the information available at the time of this review and on the behalf of the State Historic Preservation Officer in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR800. Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and a copy of these comments should be included in subsequent environmental documents.

Sincerely,

Robert G. Whitlam, Ph.D.  
State Archaeologist  
(360) 890-2615  
email: [rob.whitlam@dahp.wa.gov](mailto:rob.whitlam@dahp.wa.gov)



## A.2.20 GSA Letter Sent to SHPO Regarding Draft EIS (August 12, 2024)



U.S. General Services Administration

August 12, 2024

Robert Whitlam, Ph.D.

State Archaeologist

Washington State Department of Archaeology and Historic Preservation

P.O. Box 48343

Olympia, Washington 98504

Dear Dr. Whitlam,

The U.S. General Services Administration (GSA) Region 10 has prepared a Draft Environmental Impact Statement (EIS) to analyze the potential environmental impacts from the proposed expansion and modernization of the existing Kenneth G. Ward (Lynden) and Sumas Land Ports of Entry (LPOE) in Lynden and Sumas, Washington, in accordance with the requirements of the National Environmental Policy Act of 1969 (NEPA) and the National Historic Preservation Act (NHPA). GSA is soliciting comments on the Draft EIS, which includes a Floodplain Assessment and Statement of Findings as an appendix.

The Lynden LPOE serves as the port of entry for people and vehicles connecting Lynden, Washington to Aldergrove, British Columbia, Canada. The Sumas LPOE serves as the port of entry for people and vehicles connecting Sumas, Washington to Abbotsford, British Columbia, Canada. The projects at the Lynden and Sumas LPOEs are analyzed jointly in the Draft EIS due to their proximity (approximately 10 miles) to one another. Operational changes at one of the LPOEs could have impacts on the other LPOE, especially during construction. The Draft EIS examines the impacts on human, natural, and cultural resources from potential improvements at the LPOEs, including site expansion, demolition, and new construction.

The purpose of these projects is for GSA to support the U.S. Department of Homeland Security's Customs and Border Protection (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 Draft EIS considers two action alternatives for the Lynden LPOE, three action alternatives for the Sumas LPOE, and a "no action" alternative for each LPOE. The "no action" alternative assumes that GSA would not expand or modernize the Lynden or Sumas LPOEs and that operations would continue under the current conditions.

At the Lynden LPOE, GSA proposes to construct a Main Building and Head House, a non-intrusive inspection building, commercial inspection yard, inspection booths/canopies, staff/visitor parking, inbound and outbound inspection areas, and utility facilities, as needed. The two action alternatives differ in the direction of the LPOE expansion and the maximum proposed limit of disturbance. The option to expand the LPOE to the west and east would disturb a maximum area of approximately 14.5 acres. The other action alternative would expand the LPOE to the north and south and would impact a maximum of approximately 10.3 acres.

At the Sumas LPOE, GSA proposes to construct a Main Building, a non-intrusive inspection building, inspection booths/canopies, inbound and outbound inspection areas, hazardous materials and agriculture inspection platforms, stormwater detention area, outdoor parking and staging areas, and utility facilities, as needed. The three action alternatives differ in the potential siting of inspection facilities and construction



U.S. General Services Administration

of a single or multi-story port building. The proposed maximum extent of disturbance under any of the Sumas action alternatives is approximately 12.9 acres.

Two construction sequencing options were considered in the Draft EIS; these options are independent of the action alternatives and could be implemented with any of the action alternatives. Under the Concurrent Construction option, both ports would remain open during construction. Under the Sequential Construction option, GSA and CBP are considering the potential for a temporary closure of the Lynden LPOE. Additional details on the alternatives and the construction sequencing options being considered are provided in the Draft EIS.

The Draft EIS addresses the potential environmental impacts of the proposed alternatives on environmental resources including 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; socioeconomic; and environmental justice and protection of children's health and safety. Based on the analysis presented in the Draft EIS, impacts to all resource areas would be less than significant (i.e., negligible, minor, or moderate). Impact reduction measures are presented in the Draft EIS to reduce potential adverse effects.

The Sumas LPOE project area is located within the 1-percent-annual-chance floodplain (also referred to as the base flood or 100-year flood) and 0.2-percent-annual-chance floodplain (also referred to as the 500-year flood). In compliance with Executive Order 11988 (Floodplain Management), GSA prepared a Floodplain Assessment and Statement of Findings, addressing potential impacts on floodplains, which is included in the Draft EIS for public review and comment. As described in the Draft EIS, GSA would follow federal, state, and local regulatory compliance requirements and incorporate design standards at the Sumas LPOE to minimize impacts to floodplains.

The public is encouraged to attend and participate in an in-person, open house public hearing to be held on **September 4, 2024, from 6 p.m. to 8 p.m. PT**. The purpose of this hearing is to present the findings of the Draft EIS to the public and to solicit feedback on the analysis. The hearing will be held at the **American Legion Post 212 building at 134 Harrison St, Sumas, WA, 98295**.

The hearing will begin with a presentation and will be followed by a public comment session. GSA staff members will be available to assist the public in providing public comments. Those not able to attend in person may submit comments via e-mail or mail, as instructed below. All written or verbal comments will be treated with equal importance. All public comments received by **September 23, 2024** will be considered in the Final EIS.

Electronic comments should be sent to the Lynden and Sumas LPOE email addresses:

- [lyndenlpo@gsa.gov](mailto:lyndenlpo@gsa.gov)
- [sumaslpo@gsa.gov](mailto:sumaslpo@gsa.gov)

Written comments on this EIS should be mailed to:

ATTN: Kimberly Gant, Regional Historic Preservation Officer  
Lynden and Sumas LPOEs EIS  
U.S. General Services Administration, Northwest/Arctic Region 10  
1301 A Street, Suite 610  
Tacoma, Washington 98402

For more information or if special assistance is needed to attend and participate in the Draft EIS public hearing, please contact Kimberly Gant, GSA Region 10 Regional Historic Preservation Officer at [kimberly.gant@gsa.gov](mailto:kimberly.gant@gsa.gov) or 253-666-0891.



U.S. General Services Administration

Additional information and project updates are available on the GSA websites at: [www.gsa.gov/lynden](http://www.gsa.gov/lynden) and [www.gsa.gov/sumas](http://www.gsa.gov/sumas).

Sincerely,

**KIMBERLY GANT** Digitally signed by KIMBERLY  
GANT  
Date: 2024.08.12 07:49:29 -07'00'

Kimberly Gant  
Regional Historic Preservation Officer  
GSA | Public Buildings Service | Region 10



## A.2.21 GSA Letter Sent to Lummi Nation Regarding Draft EIS (August 12, 2024)



U.S. General Services Administration

August 12, 2024

Anthony Hillaire  
Chairman  
Lummi Nation  
2665 Kwina Road  
Bellingham, Washington 98226

Dear Chairman Hillaire,

The U.S. General Services Administration (GSA) Region 10 has prepared a Draft Environmental Impact Statement (EIS) to analyze the potential environmental impacts from the proposed expansion and modernization of the existing Kenneth G. Ward (Lynden) and Sumas Land Ports of Entry (LPOE) in Lynden and Sumas, Washington, in accordance with the requirements of the National Environmental Policy Act of 1969 (NEPA) and the National Historic Preservation Act (NHPA). GSA is soliciting comments on the Draft EIS, which includes a Floodplain Assessment and Statement of Findings as an appendix.

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The purpose of these projects is for GSA to support the U.S. Department of Homeland Security's Customs and Border Protection (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 Draft EIS considers two action alternatives for the Lynden LPOE, three action alternatives for the Sumas LPOE, and a "no action" alternative for each LPOE. The "no action" alternative assumes that GSA would not expand or modernize the Lynden or Sumas LPOEs and that operations would continue under the current conditions.

At the Lynden LPOE, GSA proposes to construct a Main Building and Head House, a non-intrusive inspection building, commercial inspection yard, inspection booths/canopies, staff/visitor parking, inbound and outbound inspection areas, and utility facilities, as needed. The two action alternatives differ in the direction of the LPOE expansion and the maximum proposed limit of disturbance. The option to expand the LPOE to the west and east would disturb a maximum area of approximately 14.5 acres. The other action alternative would expand the LPOE to the north and south and would impact a maximum of approximately 10.3 acres.

At the Sumas LPOE, GSA proposes to construct a Main Building, a non-intrusive inspection building, inspection booths/canopies, inbound and outbound inspection areas, hazardous materials and agriculture inspection platforms, stormwater detention area, outdoor parking and staging areas, and utility facilities, as needed. The three action alternatives differ in the potential siting of inspection facilities and construction



U.S. General Services Administration

of a single or multi-story port building. The proposed maximum extent of disturbance under any of the Sumas action alternatives is approximately 12.9 acres.

Two construction sequencing options were considered in the Draft EIS; these options are independent of the action alternatives and could be implemented with any of the action alternatives. Under the Concurrent Construction option, both ports would remain open during construction. Under the Sequential Construction option, GSA and CBP are considering the potential for a temporary closure of the Lynden LPOE. Additional details on the alternatives and the construction sequencing options being considered are provided in the Draft EIS.

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U.S. General Services Administration

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Sincerely,

**KIMBERLY GANT** Digitally signed by KIMBERLY GANT  
Date: 2024.08.12 07:50:07 -07'00'

Kimberly Gant  
Regional Historic Preservation Officer  
GSA | Public Buildings Service | Region 10

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