



U.S. DEPARTMENT OF HOMELAND SECURITY **OFFICE OF INSPECTOR GENERAL**

OIG-24-32

June 17, 2024

FINAL REPORT

Infrastructure Investment and Jobs Act Funding: CBP Must Improve Processes for Addressing Critical Repairs at CBP-owned Land Ports of Entry





OFFICE OF INSPECTOR GENERAL

U.S. Department of Homeland Security

Washington, DC 20528 | www.oig.dhs.gov

June 17, 2024

MEMORANDUM FOR: Troy Miller
Senior Official Performing the Duties of the Commissioner
U.S. Customs and Border Protection

FROM: Joseph V. Cuffari, Ph.D.
Inspector General

**JOSEPH V
CUFFARI**

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CUFFARI
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SUBJECT: *Infrastructure Investment and Jobs Act Funding: CBP Must Improve Processes for Addressing Critical Repairs at CBP-owned Land Ports of Entry*

Attached for your action is our final report, *Infrastructure Investment and Jobs Act Funding: CBP Must Improve Processes for Addressing Critical Repairs at CBP-owned Land Ports of Entry*. We incorporated the formal comments provided by your office.

The report contains one recommendation to develop and implement guidance to standardize the process of identifying, validating, prioritizing, and resolving critical repairs at CBP-owned LPOEs identified through the FCA process. Your office concurred with the recommendation. Based on information provided in your response to the draft report, we consider the recommendation resolved and open. Once your office has fully implemented the recommendation, please submit a formal closeout letter to us within 30 days so that we may close the recommendation. The memorandum should be accompanied by evidence of completion of agreed-upon corrective actions and of the disposition of any monetary amounts.

Please send your response or closure request to OIGInspectionsFollowup@oig.dhs.gov.

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Please contact me with any questions, or your staff may contact Thomas Kait, Deputy Inspector General for the Office of Inspections and Evaluations, at (202) 981-6000.

Attachment



DHS OIG HIGHLIGHTS

Infrastructure Investment and Jobs Act Funding: CBP Must Improve Processes for Addressing Critical Repairs at CBP- owned Land Ports of Entry

June 17, 2024

Why We Did This Evaluation

Pursuant to the *Inspector General Act of 1978*, as amended, the Office of Inspector General provides oversight of CBP's use of the IIJA PC&I funding. We conducted this evaluation of CBP's processes to ensure spending of IIJA PC&I funding aligns with priorities for improving CBP-owned LPOEs.

What We Recommend

We made one recommendation to improve CBP processes for identifying, validating, prioritizing, and resolving priority, critical and life safety repairs at CBP-owned LPOEs.

For Further Information:

Contact our Office of Public Affairs at (202) 981-6000, or email us at:

DHS-OIG.OfficePublicAffairs@oig.dhs.gov.

What We Found

U.S. Customs and Border Protection (CBP) spent \$60 million of *Infrastructure Investment and Jobs Act* (IIJA) procurement, construction, and improvements (PC&I) funding on six contracts in fiscal years 2022 and 2023 to modernize and improve CBP-owned land ports of entry (LPOEs). In FY 2022, CBP spent \$16 million of IIJA PC&I funding for two contracts for maintenance and repairs at CBP-owned LPOEs. In FY 2023, CBP spent \$44.5 million of IIJA PC&I funding for contracts to modernize six CBP-owned LPOEs. In FY 2024, CBP plans to use IIJA PC&I funding for contracts to include work to address outstanding priority repairs at CBP-owned LPOEs.

These contracts addressed 39 repairs CBP categorized as priority, critical and life safety repairs. We found, as a result of CBP's inconsistent processes for identifying, validating, prioritizing, and resolving repairs, 25 priority, critical and life safety repairs, including electrical and fire code violations, were not addressed. Meanwhile, CBP spent IIJA PC&I funding on repairs CBP categorized as lower priority such as painting and furniture replacements.

CBP Response

CBP concurred with our recommendation. We consider the recommendation resolved and open.



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Background

U.S. Customs and Border Protection (CBP) manages operations at land ports of entry (LPOEs), where officers perform immigration and customs functions at the U.S. border with Mexico and Canada. CBP's Office of Field Operations (OFO) operates 167 LPOEs. Of those 167 LPOEs, CBP owns and maintains 40 LPOEs.¹

In November 2021, the *Infrastructure Investment and Jobs Act* (IIJA)² appropriated \$3.85 billion to modernize and improve LPOEs. The IIJA funding was the largest capital investment made in CBP LPOEs since the *American Recovery and Reinvestment Act* (ARRA)³ invested \$420 million in LPOEs in February 2009. The IIJA appropriated funding for LPOEs in three categories:

- \$3.42 billion to General Services Administration (GSA) for construction, acquisition, repairs, and alterations to LPOEs;⁴
- \$330 million for CBP to purchase furniture, fixtures, and equipment for LPOEs; and
- \$100 million for procurement, construction, and improvements (PC&I) investments in CBP-owned LPOEs.

As required by the IIJA, on July 18, 2022, CBP developed and submitted to Congress a 5-year spending plan for the \$100 million PC&I funds. Funds are available for 5 years and must be obligated by the end of fiscal year 2026. The table⁵ on the next page summarizes CBP's spending plan for the PC&I funding and shows that CBP planned to allocate all PC&I funding in FY 2022, 2023, and 2024.

¹ See Appendix C for a list of the 40 CBP-owned LPOEs. Of the 167 LPOEs, the GSA fully owns 101, partially owns 3, and leases 19, for a total of 123; CBP owns 40 and leases 1, the National Park Service owns 2, and the U.S. Department of Agriculture/U.S. Forest Service owns 1.

² IIJA, Pub. L. No. 117-58 (Nov. 15, 2021).

³ ARRA, Pub. L. No. 111-5 (Feb. 17, 2009).

⁴ We previously reported on critical and life safety repairs that went unaddressed by CBP at CBP International Mail Facilities leased by GSA. *CBP's Management of International Mail Facilities Puts Officer Safety and Mission Requirements at Risk*, OIG-23-48, Aug. 31, 2023. The Office of Inspector General also notified CBP on July 12, 2023, that OIG initiated an audit of CBP Facility Condition Assessments which includes CBP facilities that GSA leases.

⁵ CBP's spending plan in the table below was CBP's estimate at the time CBP submitted it to Congress.



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Table. CBP IIJA PC&I Spending Plan Summary FY 2022–FY 2026

(Dollars in 1,000s)

Projects	FY 2022	FY 2023	FY 2024	FY 2025	FY 2026	Total
Repairs and Alterations	\$16,500	\$26,000	\$14,250			\$ 56,750
Major Modernization		\$10,000	\$20,000			\$ 30,000
Officer Housing		\$ 1,000				\$ 1,000
Operational Security		\$10,000	\$ 2,000			\$ 12,000
Office of Inspector General	\$ 250					\$ 250
Total	\$16,750	\$47,000	\$36,250			\$100,000

Source: OIG analysis of CBP data

The IIJA provided that [o]ne-quarter of one percent of the amounts made available [to Department of Homeland Security under the Act] be transferred to the OIG of DHS for oversight of funding provided to [DHS under the Act].⁶ Between March 2023 and February 2024, we conducted an evaluation of CBP’s processes to ensure spending of IIJA PC&I funding aligns with priorities for improving CBP-owned LPOEs.

Results of Evaluation

CBP Awarded Six Contracts Using IIJA PC&I Funding

CBP awarded six contracts using IIJA PC&I funding for a total of \$60 million. In FY 2022, CBP spent \$16 million of IIJA PC&I funding for two contracts for maintenance and repairs at CBP-owned LPOEs. In FY 2023, CBP spent \$44.5 million of IIJA PC&I funding for contracts to modernize six CBP-owned LPOEs. In FY 2024, CBP plans to use IIJA PC&I funding for contracts to address outstanding priority repairs at CBP-owned LPOEs.

CBP spent \$9.5 million of IIJA PC&I funding in FY 2022 on a contract to address building maintenance and repairs at CBP-owned LPOEs, including:

- installation of fire alarms;
- heating, ventilation, and air conditioning unit replacements;

⁶ Pursuant to the IIJA, CBP transferred \$250,000 to the DHS OIG for oversight of IIJA PC&I funding. The IIJA also provided funding for the DHS Cybersecurity and Infrastructure Security Agency’s (CISA) critical infrastructure sector activities. DHS OIG initiated an evaluation of CISA and issued the report, *CISA’s Use of Infrastructure Investment and Job Act Funds*, OIG-24-22, Apr. 18, 2024.



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- fire suppression, sprinkler system, and electrical panel repairs and/or replacement;
- water system, concrete, and asphalt repairs; and
- ballistic glass replacements.

CBP project managers monitor the progress of contracts. In the first 15 months, CBP's contractors completed 12 repairs, 42 were in progress, and 49 were not started as of December 11, 2023. CBP project managers told us the contractor is on schedule to complete all repairs during the contract period of performance.⁷

CBP also spent \$6.5 million of IIJA PC&I funding in FY 2022 on a contract to replace back up power generators at all CBP-owned LPOEs due to age, under sizing, or because they did not meet current emergency backup power needs. In the first 15 months, CBP's contractors completed generator installations at 9 of the 40 CBP-owned LPOEs. CBP project managers told us installations began in August 2023, 11 months following the contract's award, because of an approximate 1-year lead time for acquisition of generators. The approved project schedule includes approximately one generator replacement per week until all 40 generators are installed.⁸

In FY 2023, CBP awarded four contracts worth \$44.5 million of IIJA PC&I funding for modernization projects⁹ and repairs at six CBP-owned LPOEs. Modernization projects include:

- additional private vehicle inspection areas;
- installation of gates, fencing, lighting, and cameras to enhance operational security; and
- restrooms that comply with accessibility laws and standards.

The figure (on the next page) shows the six CBP-owned LPOEs selected for modernization and their locations. Under the contracts' period of performance, CBP's contractors have until August 2026 to complete the work at the six LPOEs. At the time of our fieldwork, CBP project managers told us these projects were in the design phase.

⁷ The building maintenance and repairs contract period of performance is September 30, 2022, to September 30, 2025.

⁸ The generator contract period of performance is September 26, 2022, to September 25, 2024.

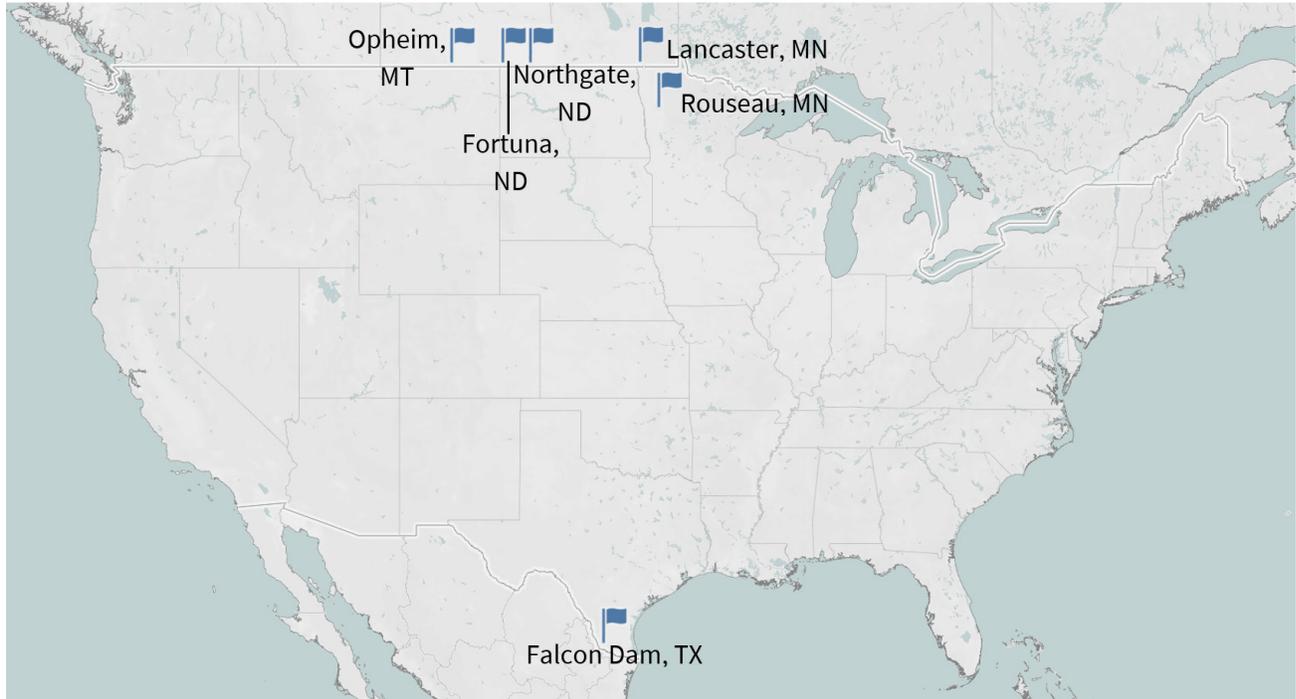
⁹ In 2019 and 2020, CBP assessed the physical design of CBP-owned LPOEs and compared the current state (what is present) against minimum design requirements (what should be present) to meet each LPOE's mission. CBP's assessments identified physical design deficiencies at some CBP-owned LPOEs including the six selected in FY 2023 for modernization projects and repairs using IIJA PC&I funding.



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Figure. CBP-owned LPOEs Selected for Modernization Using IIJA PC&I Funding, FY 2023



Source: DHS OIG

In its spending plan submitted to Congress, CBP allocated \$36 million in IIJA PC&I funding for FY 2024 enhancements at CBP-owned LPOEs. CBP shared preliminary priorities with us, which identified \$28 million in potential investments in FY 2024, to include health and life safety repairs and other priority repairs such as heating, ventilation, and air conditioning upgrades and water system and public water connection upgrades.

CBP’s Processes to Address Critical and Life Safety Repairs at CBP-owned LPOEs Did Not Consistently Ensure Resolution of Repairs

CBP spent \$60 million of IIJA PC&I funding on six contracts in FY 2022 and FY 2023 to modernize and improve CBP-owned LPOEs, but their processes for identifying, validating, prioritizing, and resolving priority, critical and life safety repairs¹⁰ (critical repairs) did not consistently ensure prompt resolution of these repairs.

¹⁰ Throughout this report, we use critical repairs to refer to ‘critical and life safety’ repairs. CBP’s Office of Facilities and Assets Management (OFAM), *Centralized Facility and Personnel Impact Reporting Policy*, Aug. 2023, defines life safety issues as, “Facility disruption impacts which limit occupants a reasonable level of safety during fire and other



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U.S. Department of Homeland Security

DHS requires¹¹ that each component complete Facility Condition Assessments (FCAs)¹² every 5-years. When we began our fieldwork in March 2023, we found that CBP complied with the DHS requirement for 35 CBP-owned LPOEs. However, CBP had not conducted FCAs for over 8 years at 5 of the 40 CBP-owned LPOEs. As a result, when it received IIJA PC&I funding in FY 2022, CBP did not have complete or the most current information¹³ on needed repairs at all 40 CBP-owned LPOEs to inform decisions on spending. For example,

- in September 2022, CBP awarded two contracts using IIJA PC&I funding to address repairs at CBP-owned LPOEs including the 5 LPOEs overdue for FCAs; and
- in August 2023, CBP awarded a contract using IIJA PC&I funding to modernize the Fortuna LPOE although the last FCA for the LPOE was completed in August 2015. CBP conducted a new FCA at the LPOE after awarding the Fortuna LPOE modernization contract.

By September 2023, CBP had met the DHS requirement and had conducted FCAs within the past 5 years for all 40 CBP-owned LPOEs and identified hundreds of repairs and deficiencies, including:

- critical repairs CBP categorized as repairs needing immediate attention, such as fire and electrical code violations or malfunctioning ventilation systems;
- potentially critical repairs that CBP determined should be addressed over a 1- to 2-year timeframe, such as panel siding and telephone systems; and
- non-critical repairs that CBP determined should be addressed over a 3- to 5-year timeframe such as worn flooring and carpeting, damaged gutters and downspouts, and repairs to asphalt paving.

The FCAs listed CBP as the entity responsible for 102 critical repairs with planned action dates to complete them “as soon as possible” or within 1 year. CBP knew about some of these critical repairs as early as 2020 but did not consistently ensure their prompt resolution by the planned

emergencies. It includes but is not limited to fire alarms, fire protection (suppression) systems, exits, and fire barriers.” CBP’s contractor that conducts and reports on facility assessments uses the International Code Council and National Fire Protection Life Safety Code. According to OFAM, CBP considers any fire protection or the Occupational Safety and Health Administration-required violations as life safety/critical.

¹¹ Instruction Manual 119-02-004-01, *DHS Real Property Facility Condition Standard*, Sept. 2023. DHS Directive 119-02, Revision Number 00, *Real Property Management Program*, December 10, 2012; DHS Instruction 119-02-001, *Real Property Manual*, July 2010; DHS Instruction 119-02-004, Revision Number 00, *Real Property Facility Condition Assessment*, July 3, 2018.

¹² FCAs assess facility conditions to identify repairs and the estimated cost of implementing the repairs. FCA findings are based on a visual inspection of the entire building (exterior and interior), all building systems, grounds abutting the building, its components, and existing building operational support systems.

¹³ The U.S. Government Accountability Office’s (GAO) *Standards for Internal Control in the Federal Government* requires management to communicate quality information throughout the entity and remediate deficiencies on a timely basis.



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action date. CBP addressed 39 of the critical repairs, but 25 other critical repairs remained unaddressed, including fire and electrical code violations related to electrical panel boards, electrical safety switches, fire alarms, and fire suppression sprinkler systems.

CBP's processes for prioritizing repairs identified as critical in FCAs did not consistently ensure prompt resolution of these repairs. For example, CBP awarded six contracts throughout FY 2022 and FY 2023 using IIJA PC&I funding to address some of these repairs. However, CBP did not prioritize the 25 unaddressed critical repairs for inclusion in the contracts. Meanwhile, CBP included in these contracts, repairs categorized as lower priorities, such as painting, LED upgrades to lighting fixtures, redesign of officer workstations, furniture replacements, and asphalt and concrete crack repairs.

CBP also did not have reliable processes for validating repairs identified as critical in FCAs. We determined that many of the repairs originally classified as critical repairs in CBP's FCAs were inaccurately categorized. During our evaluation, we requested CBP verify the status of critical repairs identified in FCAs. As a result of our request, CBP determined 38 of the 102 critical repairs were inaccurately categorized and were not critical or life safety repairs. In January 2024, CBP notified us that they re-categorized these 38 repairs to non-critical, non-priority repairs, further demonstrating CBP's processes need refinement.

CBP did not consistently ensure resolution of critical repairs using IIJA PC&I funding because CBP does not have a documented, standardized process for identifying, validating, prioritizing, and resolving critical repairs identified by FCAs. According to CBP officials, CBP is improving its processes. In September 2023, CBP established a division within the OFAM¹⁴ to oversee validation, prioritization, and resolution of FCA-identified deficiencies and initiated a review of how they identify and escalate critical repairs to leadership for awareness and corrective action.

Conclusion

CBP made considerable progress in using IIJA PC&I funding to address deficiencies at CBP-owned LPOEs through the award of contracts. CBP could improve processes for identifying, validating, prioritizing, and resolving identified critical repairs that require immediate resolution.

Recommendation

Recommendation: We recommend the Assistant Commissioner, OFAM, CBP, develop and

¹⁴ OFAM manages CBP-owned and -leased property, including CBP-owned LPOEs. OFAM provides facility services for CBP such as management and administration of leases, project management support, and assessments of the condition, function, and overall performance of existing facilities, including leading assessments of facility condition and functionality. In this role, OFAM manages the processes CBP uses to identify repairs at CBP-owned LPOEs and informs funding decisions, including spending of IIJA PC&I funding.



OFFICE OF INSPECTOR GENERAL

U.S. Department of Homeland Security

implement guidance to standardize the process of identifying, validating, prioritizing, and resolving critical repairs at CBP-owned LPOEs identified through the FCA process.

Management Comments and OIG Analysis

In response to our draft report, CBP officials concurred with our recommendation and described corrective actions to address the issues we identified. We consider the recommendation resolved and open. Appendix B contains CBP's management response in its entirety. We also received a technical comment on the draft report and revised as appropriate. A summary of CBP's response and our analysis follows.

CBP Response to Recommendation: Concur. CBP noted actions taken to address this recommendation, including the establishment of an Integrated Services Division within OFAM to centralize and enhance management and oversight of FCA processes as well as an FCA Tiger Team to assess FCA processes. In addition, OFAM will establish a comprehensive policy to include guidance on the identification, validation, prioritization, and resolution of critical repairs at CBP-owned LPOEs identified through the FCA process. Estimated completion date: September 30, 2025.

OIG Analysis: We consider these actions responsive to the recommendation, which we consider resolved and open. We will close this recommendation when CBP submits documentation that it has developed and implemented guidance for identifying, validating, prioritizing, and resolving critical repairs at CBP-owned LPOEs.



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Appendix A: Objective, Scope, and Methodology

The Department of Homeland Security Office of Inspector General was established by the *Homeland Security Act of 2002* (Pub. L. No. 107-296) by amendment to the *Inspector General Act of 1978*.

The IIJA provided that [o]ne-quarter of one percent of the amounts made available [to DHS under the Act] be transferred to the OIG of DHS for oversight of funding provided to [DHS under the Act]. Our objective was to evaluate CBP's processes to ensure spending of IIJA funding aligns with priorities for improving CBP-owned LPOEs.

To answer our objective, we coordinated with DHS OIG Office of Audits regarding prior relevant work, *CBP's Management of International Mail Facilities Puts Officer Safety and Mission Requirements at Risk*, OIG-23-48, August 31, 2023, as well as Office of Audits work on CBP Facility Condition Assessments initiated on July 12, 2023. We also reviewed prior relevant reporting by the U.S. Government Accountability Office (GAO).

We reviewed over 100 documents provided by CBP including:

- strategic resource assessments;
- investment and spending plans;
- FCAs and Facility Functional Assessments;
- DHS and CBP real property policies and guidance;
- independent government cost estimates for contracted work;
- funding justification decision memoranda;
- contractual documents for six contracts awarded by CBP;
- funding and spending data;
- project plans and progress reports; and
- other relevant documentation and data.

We used video teleconferencing and emails to interview and communicate with CBP officials (directors, section chiefs, program and project managers) regarding CBP's processes and use of IIJA PC&I funding for CBP-owned LPOEs.

We conducted fieldwork for this evaluation between March 2023 and February 2024 under the authority of the *Inspector General Act of 1978*, 5 U.S.C. §§ 401-424, and according to the *Quality Standards for Inspections and Evaluations*, issued by the Council of the Inspectors General on Integrity and Efficiency.



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DHS OIG's Access to DHS Information

During this evaluation, CBP provided timely responses to our requests for information and did not delay or deny access to information we requested.



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Appendix B:
CBP Comments on the Draft Report

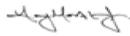
1300 Pennsylvania Avenue, NW
Washington, DC 20229



**U.S. Customs and
Border Protection**

May 20, 2024

MEMORANDUM FOR: Joseph V. Cuffari, Ph.D.
Inspector General

FROM: Henry A. Moak, Jr. 
Senior Component Accountable Official
U.S. Customs and Border Protection

SUBJECT: Management Response to Draft Report: “Infrastructure
Investment and Jobs Act Funding: CBP Must Improve
Processes for Addressing Critical Repairs at CBP-owned
Land Ports of Entry” (Project No. 23-014-ISP-CBP)

Thank you for the opportunity to comment on this draft report. U.S. Customs and Border Protection (CBP) appreciates the work of the Office of Inspector General (OIG) in planning and conducting its review and issuing this report.

CBP is pleased to note the OIG’s recognition of CBP’s use of Infrastructure Investment and Jobs Act (IIJA) procurement, construction, and improvements (PC&I) funding to modernize and improve CBP-owned land ports of entry (LPOEs) through the award of contracts. CBP manages operations at LPOEs, where CBP officers perform their dual missions to facilitate the flow of legitimate travel and trade, while also keeping terrorists and their weapons, criminals and their contraband, and inadmissible aliens out of the country. These essential missions are supported by CBP Office of Facilities and Asset Management’s (OFAM) management of CBP’s portfolio of owned and leased real property. OFAM remains committed to making improvements at LPOEs that support enhancement of processes to ensure timely identification, prioritization, and resolution of critical repairs.

The draft report contained one recommendation with which CBP concurs. Enclosed find our detailed response to the recommendation. CBP previously submitted technical comments addressing several accuracy, contextual, sensitivity, and other issues under a separate cover for OIG’s consideration.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Enclosure



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Enclosure: Management Response to Recommendations Contained in 23-014-ISP-CBP

OIG recommended that the Assistant Commissioner, OFAM, CBP:

Recommendation 1: Develop and implement guidance to standardize the process of identifying, validating, prioritizing, and resolving critical repairs at CBP-owned LPOEs identified through the FCA [facility condition assessment] process.

Response: Concur. CBP OFAM agrees with the importance of standardizing the process to identify, prioritize, and resolve critical repairs at CBP-owned facilities, including LPOEs, as identified through the FCA process. Accordingly, in fiscal year 2023, OFAM established the Integrated Services Division to centralize and enhance FCA management and oversight. OFAM is also currently evaluating the FCA program to identify challenges and opportunities to strengthen management and oversight protocols. To support this effort, OFAM established an FCA Tiger Team in March 2024 to assess current FCA operations. The Tiger Team, comprised of stakeholders across OFAM, is intended to identify program challenges and opportunities to improve the identification, prioritization, and resolution of critical repairs, while also enhancing data management procedures and controls of CBP's integrated workplace management system, TRIRIGA. The results from the FCA Tiger Team efforts are expected in May 2025.

At the conclusion of the FCA Tiger Team in May 2025, OFAM will establish a comprehensive policy, to include guidance on the identification, validation, prioritization, and resolution of critical repairs at CBP-owned LPOEs identified through the FCA process. This policy will be used in collaboration with the "OFAM Centralized Facility and Personnel Impact Reporting Policy," published in August 2023, to provide timely notification of emergent-critical facility impacts.

Estimated Completion Date: September 30, 2025.



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Appendix C: List of CBP-Owned LPOEs

Southern Border

- Antelope Wells, New Mexico
- Amistad Dam, Texas
- Falcon Dam, Texas
- Los Ebanos, Texas

Northern Border

- Bridgewater, Maine
- Easton, Maine
- Forest City, Maine
- Hamlin, Maine
- Monticello, Maine
- Lancaster, Minnesota
- Pinecreek, Minnesota
- Roseau, Minnesota
- Morgan, Montana
- Del Bonita, Montana
- Opheim, Montana
- Scobey, Montana
- Whitlash, Montana
- Wildhorse, Montana

- Willow Creek, Montana
- Pittsburg, New Hampshire
- Cannon Corners, New York
- Churubusco, New York
- Antler, North Dakota
- Carbury, North Dakota
- Fortuna, North Dakota
- Hannah, North Dakota
- Hansboro, North Dakota
- Maida, North Dakota
- Neche, North Dakota
- Noonan, North Dakota
- Northgate, North Dakota
- Sarles, North Dakota
- Sherwood, North Dakota
- Walhalla, North Dakota
- Westhope, North Dakota
- Morses Lines, Vermont
- Pinnacle Road, Vermont
- Boundary, Washington
- Frontier, Washington
- Nighthawk, Washington



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Appendix D:

Office of Inspections and Evaluations Major Contributors to This Report

Tatyana Martell, Chief Inspector

Jonathan Ban, Lead Inspector

Ashley Wilder, Inspector

Dorie Chang, Communications Analyst

Renita Caracciolo, Independent Referencer



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Appendix E: Report Distribution

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