The Commission:

**Recognizes** that Congress authorized the transfer of the 100-acre parcel located at the Beltsville Agricultural Research Center from the U.S. Department of Agriculture to the Department of Treasury as part of the 2018 Farm Bill.

**Notes** the USACE issued a Draft Environmental Impact Statement (DEIS) in late 2020 for the project that acknowledges there are anticipated impacts of the new facility and staff submitted a comment letter on the DEIS outlining its concerns regarding transportation, environmental, and historic preservation.

**Notes** staff referred the project to state and local agencies pursuant to NCPC’s Procedures for Intergovernmental Cooperation in Federal Planning in the National Capital Region and received comments from several Maryland state agencies, including the Maryland Department of Planning, Department of Natural Resources, Maryland Historic Trust, Maryland Department of Transportation and Maryland Department of the Environment who all noted the project’s consistency with their plans.

**Notes** the City of Greenbelt, which is located approximately 2 miles south of this proposed facility, submitted a letter stating its strong opposition to the project and questioning the site selection process and appropriateness of the preferred site.

**Notes** the Commission’s comments and recommendations below are organized by the environment, historic preservation, transportation, and site improvements.

**The Environment**

**Requests** USACE address the following in the preliminary submission:
- Conformance to applicable stormwater regulations
- Protection of the existing wetland area on the southeastern portion of the site
- Avoidance of any impacts to the unnamed intermittent stream on the southern portion of the site, described in the City of Greenbelt letter.
Finds the USACE is siting the building to minimize impacts to existing forested areas east and north of the main building; however, this project will require the removal of 125 specimen trees.

Requests USACE provide, as part of the preliminary design, a tree survey and replacement plan in conformance with NCPC’s tree replacement policies which prescribe a preserve, transplant, and replace approach.

Transportation/Parking

Notes USACE is proposing a 1:1 parking ratio for 884 production staff and a 1:2 parking ratio for 254 administrative staff, resulting in an overall 1:1.1 parking ratio which is inconsistent with the 1:2 parking ratio prescribed by the Comprehensive Plan for this site.

Notes USACE is requesting a variance from the 1:2 parking ratio stating:

- Telework is not an option for the currency production staff.
- WMATA is not a feasible mode of transportation for most of the currency production staff since the station is approximately two miles away and the facility’s first shift begins at 6:30am and the night shift ends at 11:30pm.
- Concentrations of BEP staff are located in southern Prince George’s and Charles County in Maryland and Stafford County in Virginia requiring longer WMATA commutes.
- WMATA operating hours provide no buffer for first shift employees arriving by 6:30am if the transit system is delayed.
- Production staff must be at their stations by the start of their shift or printing presses will stop, causing spoilage and increased currency production costs.
- USDA shuttles between BEP and Greenbelt Metrorail Station take 10-12 minutes and do not begin until 6:00 am.
- Shift hours are set by unions and are not easily changed.

Finds that USACE was aware of these conditions when selecting the site and should propose travel demand strategies with the submission of the Transportation Management Plan at preliminary review to improve the parking ratio.

Requires USACE to provide the following information with the Transportation Management Plan:

- Specific justification describing what a typical WMATA commute would be for the production staff from Virginia and Maryland and why this is unfeasible for these employees.
- An explanation of why the shift hours are difficult to adjust to better accommodate commuting by WMATA.
- A description of the USDA shuttle program operating between the Greenbelt Metrorail Station and BARC - including hours of operation, routes, frequency, and capacity levels during the day and how the addition of this BEP facility will impact this shuttle program.
- Strategies to minimize the single occupancy vehicle mode split such as carpooling, ridesharing, additional shuttles to the Metrorail Station, etc.
**Finds** the proposed surface parking lot of 1,184 spaces provides a space for almost every employee and conflicts with the Comprehensive Plan policy to place parking in structures, preferably below ground, in the interest of efficient land use and good urban design.

**Notes** that one of the primary objectives of efficient land use and good urban design is minimal impact to the environment.

**Notes** that BEP recently completed an in-depth environmental analysis evaluating the embodied carbon/greenhouse gas emissions for different parking alternatives for the site and believes that the proposed surface parking design is the best solution.

**Requests** USACE to brief the Commission before preliminary review on:
- the status of the Transportation Management Plan in addressing the Comprehensive Plan’s 1:2 parking ratio.
- the analysis that shows how the proposed design for surface parking is better environmentally than the structured or underground parking.

**Requires** USACE to submit the following at preliminary review:
- A roadway entrance design demonstrating how the proposed access road will connect to Powder Mill Road.
- An update on the roadway mitigation plans for the six intersections identified in the Transportation Impact Study.
- Information describing the nature and frequency of visitors and how this will impact the transportation network.

**Site Improvements**

**Requests** BEP provide a lighting plan and include renderings from Odell Road showing how this will not adversely impact the residential area at night.

**Requests** an analysis of operations at the proposed loading dock on the north side of the building, including any lighting or noise impacts on the residential neighborhood north of Odell Road.

**Historic Preservation**

**Notes** 22 contributing buildings on site (including laboratory buildings, poultry breeding houses, and a residence for poultry handlers) will be demolished for the facility and USACE will submit proposed mitigation measures as part of the Section 106 process at preliminary review.

**Julia A. Koster**

Secretary to the National Capital Planning Commission