Executive Director's Recommendation
Commission Meeting: April 1, 2021

PROJECT
Bureau of Engraving and Printing - Currency Production Facility
Poultry Road and Powder Mill Road
Beltsville, Maryland

SUBMITTED BY
United States Department of Defense
United States Army Corps of Engineers

REVIEW AUTHORITY
Federal Projects in the Environs
per 40 U.S.C. § 8722(b)(1)

NCPC FILE NUMBER
8243

NCPC MAP FILE NUMBER
3212.10(00.00)45284

APPLICANT'S REQUEST
Approval of comments on concept plans

PROPOSED ACTION
Approve comments on concept plans

ACTION ITEM TYPE
Staff Presentation

PROJECT SUMMARY

The United States Army Corps of Engineers (USACE), in coordination with the Bureau of Engraving and Printing (BEP), has submitted plans for a new Currency Production Facility located on a 100-acre site formerly part of the Beltsville Agricultural Research Center (BARC) near the intersection of Powder Mill Road and Poultry Road near Beltsville, Maryland. USACE is the agency contracted to lead the effort to develop this site, on behalf of BEP. USACE notes the proposed facility will provide the Department of the Treasury with an advanced, efficient, and secure space for the design and production of currency. The project consists of a 921,600 square foot building at a height of 40-50 feet, along with a series of security access control buildings at the site’s entrance off Powder Mill Road to the south. USACE states the entire project will be designed to harmonize with the surrounding agricultural setting and minimize impact to the surrounding area while supporting a highly efficient, modern, and flexible manufacturing process.

BEP is an agency within the United States Department of the Treasury. Its mission includes manufacturing United States currency as well as the research, development, testing, and evaluation of counterfeit deterrents. The BEP’s operation staff are supported by administrative and security functions and combined, consist of approximately 1,400 full-time staff. The BEP currently operates two currency production facilities in the country: one in downtown Washington, DC constructed in 1914 and another in Fort Worth, Texas, constructed in 1990. There is also a leased warehouse facility located in Landover, Maryland.

The new facility is the outcome of the BEP’s more than 20-year planning process to address deficiencies at the DC facility and modernize its operations. The BEP considered several modernization options, including renovation of the DC facility and new construction within the National Capital Region. BEP notes the studies concluded new construction, as opposed to renovation of the DC facility, would be more cost-effective and would accommodate the necessary
security procedures and setbacks. The requirements to modernize and make currency production more efficient include: a 100-acre parcel for the new facility, and the need for easy access to both highways and aviation networks. After an exhaustive search, the Beltsville Agricultural Research Center (BARC) site was found to be available with no future uses by the current owner. This 100-acre site is in the Central Section of BARC at Poultry Road and north of Powder Mill Road and south of Odell Road. In 2018, Congress passed the 2018 Farm Bill (Public Law [PL] 115-334, Title VII, Subtitle D, Section 7412) which authorized and directed an interagency land transfer of a portion of BARC from the United States Department of Agriculture to the Department of the Treasury specifically to construct and operate a CPF, subject to further site suitability evaluation.

KEY INFORMATION

- The Bureau of Engraving and Printing (BEP) is an agency within the Department of the Treasury.
- There are currently two currency production facilities in the United States, one located in Texas and one located in Washington, DC.
- BEP only evaluated sites in the National Capital Region because the unique expertise of the currency production staff requires years of study to master, and these employees currently reside in this region.
- BEP noted it evaluated many sites in the National Capital Region, both privately owned and under federal ownership before deciding on the site at BARC.
- BEP’s requirements included the need for a 100-acre site, located in the National Capital Region, easy access to the highway network, and quick access to airports.
- The proposed facility is located on a parcel that was formerly part of the Beltsville Agricultural Research Center. Congressional authorization to transfer this parcel from the US Department of Agriculture to the Department of the Treasury was included in the 2018 Farm Bill.
- The proposal includes a total 1,234 parking spaces (1,184 employee spaces and 50 visitor spaces) for 1,427 employees in three shifts and the proposed parking ratio is 1:1.1. The NCPC parking ratio for this site is 1:2.

RECOMMENDATION

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 an 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 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 TMP 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.

**PROJECT REVIEW TIMELINE**

<table>
<thead>
<tr>
<th>Previous actions</th>
<th>February 2021 – Information Presentation</th>
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<tbody>
<tr>
<td>Remaining actions (anticipated)</td>
<td>– Review of the preliminary design (Fall/Winter 2021)</td>
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</table>

**PROJECT ANALYSIS**

**Executive Summary**

NCPC staff is generally supportive of the project which includes a 921,600-square-foot facility on a 100-acre parcel within the BARC campus; however, we also acknowledge that this project will move approximately 1,500 federal jobs from the Washington, DC to Maryland. The Federal Workplace Element of the Comprehensive Plan includes policies that support maintaining a majority of the region’s federal employees within the District. While this move will not single handedly change that overall distribution, it will reduce the number of jobs in the District. NCPC staff notes the Department of Treasury’s decision to relocate to Maryland was based on the need to improve the existing currency production inefficiencies that are a result of operating in the constrained multi-floor historic site downtown.

In December 2020, staff reviewed the BEP Currency Production Facility Draft Environmental Impact Statement which evaluated two alternatives: the proposed currency production facility with associated parking and access roads and a no-build alternative. Staff comments highlighted concerns related to compliance with the NCPC parking ratio, a question about structured parking and potential impacts to transportation, vegetation, and wildlife. The comments also include
guidance regarding outreach to the local jurisdiction agencies to coordinate the proposal with planning and transportation efforts as well as to address potential community concerns. The letter is attached to this report.

Staff comments below are focused on several areas: the environment, historic preservation, transportation, and site improvements.

**Analysis**

**The Environment**

USACE provided a description of the environmental impacts associated with this project which will increase the impervious surface area, remove existing trees, impact onsite wetlands and disrupt local and migrating wildlife. USACE describes that the project will pursue a LEED silver rating and to reach this goal have included in the design such features as a green roof on 50 percent of the building, rooftop solar panels, and permeable pavement which are consistent with the Federal Environment Comprehensive Plan policies. USACE also notes the total building energy needs are estimated at 48,000 megawatt-hours per year with rooftop solar panels providing 8,790 megawatt-hours per year or 18% of the building’s total energy needs. Since non-production related energy needs are 8,600 megawatt-hours per year, the solar panels will provide 101% of these needs.

Nonetheless the proposed project significantly changes the use of the site from agricultural/institutional to industrial and will create several environmental impacts. These include:

- Increasing impervious surface area on-site from 17.3 acres to 46.7 acres increasing stormwater runoff from the site
- Filling in portions of two intermittent streams on the southern portion of the site; one of which is to allow roadway intersection improvements at Powder Mill Road.
- Potential impacts on water quality to Beaverdam Creek, which is a waterway connected to this site by two intermittent streams.
- Filling in two wetlands and impacting a third wetland on the southeastern portion of the site.
- Removing 125 of the identified 149 specimen trees on the site located in the forest and stand-alone.

In particular, staff is concerned about the amount of runoff associated with this project since it includes an increase in the amount of impervious surface area from an existing 17.3 acres to the proposed 46.7 acres. In addition, 49 percent of the site will drain south to two intermittent streams on the southern portion of the site. These streams connect to Beaverdam Creek, which the DEIS states is a Maryland designated Tier II water, indicating “…its water quality is substantially better than the minimum requirements established under Maryland’s Water Quality Standards.” (Currency Production Facility Water Resources Technical Memorandum, Nov. 2020). As such, staff requests a better understanding at preliminary review how USACE plans to meet the applicable stormwater regulations in order to minimize impacts to Beaverdam Creek.
This project also proposes to disturb two intermittent streams, one of which will be filled in to allow for the new access road approach along Powder Mill Road. While some impacts may be unavoidable to provide a safe roadway intersection, the roadway intersection aspect of the project has not been submitted for review, as it is still under development. Staff recommends this access roadway and intersection with Powder Mill Road be submitted for review at the same time the preliminary design for the proposed building is submitted.

This proposal includes the removal of 125 of the 149 specimen trees, which are defined by the State of Maryland as trees 30 inches or greater in diameter at breast height. USACE noted in the Biological Resources section of the DEIS these 125 removed trees are located in the forest and in the open meadow area on this parcel. While staff understands some trees will be impacted by this project and the DEIS describes that these trees will be replaced, the newly-approved Comprehensive Plan tree replacement policies prescribe a preserve, transplant or replace approach. It is unclear to staff if USACE explored the transplant option for trees slated to be removed. As the project will need to demonstrate its consistency with all of the Comprehensive Plan’s tree replacement policies when it is submitted for preliminary design, staff requests USACE provide a Tree Replacement Plan that includes the following information: a description of the existing forest and individual trees, a description of which trees in the forest and individually will be impacted by the development and may be eligible for transplantation, and finally how the project will meet the Comprehensive Plan’s replacement policy for forests and for individual trees.

**Environmental Recommendation:**

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**

With regard to the parking ratio, USACE is proposing one space per one production related employee and one space per two administrative employees. Overall, there are a total of 1,234 spaces with 1,184 spaces dedicated to 1,472 staff in three shifts, and 50 of the total spaces reserved for visitors and VIPs. This equates to an overall parking ratio of 1:1.1 for the new BEP facility. USACE justifies this deviation from the NCPC specified 1:2 parking ratio by noting the following:
• There are 3 shifts at this 24-hour facility.

<table>
<thead>
<tr>
<th>Shift Time</th>
<th>Staff</th>
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</thead>
<tbody>
<tr>
<td>Day shift (6:30a to 3pm)</td>
<td>1,138 staff</td>
</tr>
<tr>
<td></td>
<td>(884 production and 254 admin)</td>
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<tr>
<td>Evening shift (2:30pm to 11pm)</td>
<td>168 staff</td>
</tr>
<tr>
<td>Midnight shift (10:30pm to 7:00am)</td>
<td>166 staff</td>
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• Using WMATA is not a reliable option for this site because if production employees miss the first train (or if it is delayed) this would affect their production line.
  o Metro opens at 5:00am and the first shift (production/production support shift) need to be parked, changed into work clothes, receive any information from prior shift employees and be at their station by 6:30am.
  o There is a USDA shuttle from Greenbelt Metrorail Station.
  o Most of the staff is from southern Prince George’s County and Charles County, MD and would need to ride the entire trip on Green Line then take a bus trip to the site.
  o Cluster of staff living in Virginia would need to change trains and then take a bus which would add to the travel time.
  o The proposed BEP site is approximately two miles away from the Greenbelt Metro station and there are no dedicated sidewalks or pathways connected to the site.

• Employees will normally arrive at the site between 5:30am and 6am to give them time to get ready before their shift begins.
• Shift start and end times are set by the employee unions and would be difficult to change.
• The presses run 24 hours a day. If the 1st shift employees are not ready to go when the midnight shift is finished, BEP notes they will have to stop the presses, which causes production waste and increases production cost.

Staff has reviewed the information USACE provided regarding its deviation from the prescribed 1:2 NCPC parking ratio, however it is not clear from the submission materials why there needs to be parking provided for two shifts during the day when WMATA trains would be accessible. USACE will need to provide a Transportation Management Plan (TMP) detailing how BEP will encourage alternative commuting modes and which strategies it will use to reduce single occupancy vehicle (SOV) use. NCPC submission guidelines require the USACE provide a TMP with the preliminary design submission.

Another staff concern is this project is not consistent with the Transportation Element regarding structured parking. Transportation Element policy (T.B.5) states “Place parking in structures, preferably below ground, in the interest of efficient land use and good urban design.” This policy, included in the Comprehensive Plan, supports the efficient use of land and is good urban design as it promotes compact development. Minimizing environmental impact is also one of the main objectives. As part of this proposal, the design team is proposing:
  • trees infilled between parking bays,
  • permeable pavement at the parking spaces,
  • reinforced grass pavement,
  • micro-bioretention between parking bays or on-site roads,
• bioswales to slow stormwater runoff, and
• submerged gravel wetlands on the perimeter of the site.

Initially, USACE proposed a terraced parking option for this facility, with parking areas “overlapping” each other by using a partially below grade parking structure, but has identified the surface parking lot design as their preferred alternative for the following reasons:
• Poor on-site soil conditions that make below grade structures unfeasible
• Viewshed impacts of an above grade parking structure from Odell Road; and
• The surface parking design as proposed has the smallest environmental impact in terms of embodied carbon/greenhouse emissions compared with underground and structured parking.

Since the proposal was submitted, the USACE and their design team have conducted an in-depth environmental analysis of structured and underground parking versus the proposed enhanced surface parking option. This analysis calculates the embodied carbon/greenhouse gas emissions from construction of a new parking structure versus the embodied carbon for the proposed surface parking lot design. Embodied carbon is a relatively new term defined by the World Green Building Council as “Carbon emissions associated with materials and construction processes throughout the whole lifecycle of a building or infrastructure…”1 A summary of this analysis was recently shared with staff and it concluded the embodied carbon of structured and underground parking for this site was significantly greater than the proposed enhanced surface parking. Staff is currently evaluating the analysis and agrees that this is an important discussion. While it is important to analyze the amount of energy and resources that are used for all parking options, it is also important to look at whether surface parking is precluding a better use of the land such as compact development (which also reduces greenhouse gas emissions). This is an unusual circumstance because the surrounding land is largely agricultural.

In order to address the project’s consistency with the Comprehensive Plan’s policy on structured parking, staff believes a briefing to the Commission on the embodied carbon/greenhouse emission analysis would be beneficial prior to preliminary review.

Staff notes there are several intersection improvements associated with this project: one intersection where the facility access road connects to Powder Mill Road and six nearby intersections that the Transportation Impact Study noted will become failing intersections as a result of this project. USACE did not submit any information regarding the design of the access road as part of the concept submission, therefore staff requests USACE submit a preliminary design for the Commission’s next review. With regard to the six intersections, staff requests information regarding timing and coordination for improvements to the intersections.

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Finally, USACE noted in the proposal and in the February information presentation that there will be visitors coming to tour this new facility. USACE has not been provided any additional details about this program. Staff requests USACE provide supplemental information describing the nature and frequency of visitors arriving at this site to better understand potential impacts on the roadway network and number of visitor parking spaces needed.

**Transportation/Parking Recommendation:**

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 1:1.10 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 an 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 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 TMP 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 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 arriving and using the site and demonstrate how this might affect the transportation network.

Site improvements

Staff understands this project was submitted for concept review and there are some items that have not been designed or decided. When the project is submitted for preliminary review staff recommends USACE provide additional details regarding site lighting and loading. These issues were also raised by MNCPPC and City of Greenbelt. Staff encourages USACE to meet Dark Sky guidelines which seek to minimize light pollution off site. This is especially important here given there is minimal existing lighting at this site. Providing a viewshed analysis with photo-simulations would be also helpful to show potential impacts. The loading dock concern is really focused on what would be visible or audible from Odell Road and points north.

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

In the submission materials, the USACE notes BEP evaluated architectural resources 45 years of age or older within the architectural history area of potential effect (APE) for both physical effects and for visual effects. The site is located within the BARC Historic District, a previously identified 6,582-acre historic property. Within the site there are 22 buildings and structures that are contributing resources to this historic district and include four laboratory buildings, a residence for poultry handlers to live on site, a few sheds and storage buildings, and 13 poultry breeding houses. These buildings have been vacant for decades. No architectural resource individually eligible for listing in the National Register of Historic Places (NRHP) exists within the site.

The USACE also notes “…the site is located in the 200 Area Cluster within the Central Farm of the BARC Historic District. The area generally reflects a 1934 New Deal-era master plan by architect Delos Smith and landscape architect A.D. Taylor, which included park-like conditions, clipped lawns, formal planting areas, and trees planted on a relaxed grid to shade the poultry houses. Although the site does contain archeological areas, the proposal will not impact any area eligible for listing on the NRHP. In addition, none of the buildings on the site were found to be individually significant for listing on the NRHP. The most prominent views of the CPF site are from segments of Powder Mill Road and Odell Road. These views are characterized by BARC facilities, fields, and forests as well as power lines, poles, and a chain-link fence along the site boundary.”

The submission describes the area of potential effects for visual impacts, including from a portion of the BARC Historic District. USACE identified and photographed viewpoints of the character-defining viewsheds and landscape. The BARC Historic District's landscape generally consists of vast open space, cultivated fields, and hundreds of buildings and structures scattered throughout the facility. Contributing elements to the landscape of the BARC Historic District include major paved roads, minor service roads, field and research crops, pasture lands, seasonal ponds, forests, sustainable meadows, other landscape features, and buildings (Dwyer, 1973; PAC Spero & Company, 1998; Farris, 2017). This is representative of the architectural history APE for visual effects for the proposed CPF.

In addition, BEP conducted two Phase I archaeological surveys to identify and evaluate archaeological resources. There were three potentially eligible sites to the NRHP in the archaeological APE. BEP noted the project will avoid any potential impacts to one potentially eligible site because there are no site improvements or buildings located near it, so no further evaluation is required at that site. BEP then conducted Phase II evaluations for the two remaining sites with a potential of being adversely affected by this proposal. BEP determined neither of these sites are eligible for the NRHP based on the Phase II evaluations.

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.
CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE

Comprehensive Plan for the National Capital

This project is consistent with many policies contained within the Comprehensive Plan, however there are two policies within the Transportation Element where the project is not consistent, namely, the parking ratio and the structured parking policy. Staff analysis for these policies is described earlier in this staff report. In addition, staff requires information from the USACE regarding stormwater management, tree survey and replacement, site lighting impacts and loading impacts.

National Historic Preservation Act

Pursuant to the National Historic Preservation Act, USACE initiated Section 106 consultation for this project which contains 22 buildings and structures that are contributing to the BARC Historic District, three archeological sites and historic viewsheds. Consulting parties have agreed on developing a Memorandum of Agreement (MOA) to address the impacts from this project and mitigation is being proposed in the draft MOA which has been developed. Staff anticipates this MOA will be fully executed by this summer.

National Environmental Policy Act

Pursuant to the National Environmental Policy Act, USACE issued a Notice of Intent to prepare the Environmental Impact Statement in the Federal Register on November 15, 2019. The Treasury published a Notice of Availability (NOA) of the Draft EIS in the Federal Register on November 6, 2020. The public comment period on the Draft EIS occurred over a 45-day period from November 6, 2020 to December 21, 2020. This included a virtual public meeting held on December 2, 2020. Staff submitted a letter which is attached to this report and the FEIS is anticipated this summer.

CONSULTATION

Staff referred the project on January 11, 2021 to the Maryland Clearinghouse, the Maryland National Capital Park and Planning Commission, and the City of Greenbelt. We received responses from all of these agencies. The Maryland Clearinghouse forwarded the project to state, local and county agencies and the state agencies noted the project was in conformance with their plans. The Maryland Historic Trusted noted it was finalizing the Section 106 process through the execution of a Memorandum of Agreement which was being circulated. The Maryland National Capital Park and Planning Commission requested NCPC to submit the preliminary design referred to it as well so it can better evaluate the project.
In a letter dated, March 3, 2021, the City of Greenbelt stated its strong opposition to the project noting an incomplete DEIS analysis and the project being placed in an inappropriate site. However, it also noted if the building has to be placed at this site, then many items need to be addressed:

- Consistency of building aesthetic with the rest of the campus.
- Placement of the building on the site is close to Odell Road,
- Scale of the building is too large.
- Impacts to trees and forested area.
- Amount of additional impervious surface area and stormwater management implications.
- Reduction in limit of disturbance of entry roadway to reduce impact to unnamed intermittent stream.
- Lighting spillage from site and loading dock sound impacts on Odell Road neighbors (possibly moving loading area from the north)
- Need for pedestrian/bicycle amenities to the site from Powder Mill and in the vicinity of the site.

ONLINE REFERENCE

The following supporting documents for this project are available online at [www.ncpc.gov](http://www.ncpc.gov):

**Attachments**

- PowerPoint
- Attachment A – NCPC staff comments on Draft Environmental Impact Statement, dated December 21, 2021
- Attachment B – City of Greenbelt letter, dated March 3, 2021
Bureau of Engraving and Printing - Currency Production Facility

Poultry Road and Powder Mill Road, Beltsville, Maryland

Approval of Comments on Concept Plans

United States Army Corps of Engineers, Department of the Treasury
Project Summary

Commission Meeting Date: April 1, 2021

NCPC Review Authority: 40 U.S.C. § 8722(b)(1)

Applicant Request: Approval of Comments on Concept Plans

Session: Staff Presentation

NCPC Review Officer: Carlton Hart

NCPC File Number: 8243

Project Summary:

The US Army Corps of Engineers acting on behalf of the Bureau of Engraving and Printing (BEP), proposes to construct and operate a new Currency Production Facility (CPF) at the Beltsville Agricultural Research Center to replace its existing production facility located in downtown Washington, DC. The Washington, DC production facility (DC facility), built in 1914, has been in operation for more than 100 years. This facility has previously undergone focused renovations to support new production technology. However, as BEP’s currency production has modernized and added more complex processes and security features, the existing facilities are no longer able to support an efficient, secure, and innovative manufacturing process. The DC facility’s fundamental physical characteristics--including its age and its multi-story, multi-wing layout--inhibit the secure, efficient, and flexible production of United States currency. The current layout of the DC facility requires currency paper to travel 1.06 miles over multiple stories from start to finish; in contrast, at the Texas production facility, currency travels .42 miles in a single story.

The new facility is the outcome of the BEP’s more than 20-year planning process to address deficiencies at the DC facility and modernize its operations. The BEP considered several modernization options, including renovation of the DC facility and new construction within the National Capital Region. These studies concluded that new construction, as opposed to renovation of the DC facility, would be more cost-effective and would accommodate the necessary security procedures and setbacks. The BEP initially considered multiple sites within the NCR and evaluated them against prerequisite criteria for operating a CPF.
Project Summary

The final site screening criteria included:

• Location: The site must be within an approximately 30-mile radius of central Washington, DC (i.e., measured from the Washington Monument), allowing for proximity to BEP’s uniquely skilled workforce.

• Accessibility: A major interstate must be accessible within 10 miles of the site to transport currency safely and efficiently. The site must also be reasonably near an international airport for currency transportation by air.

• Availability: The site must be available for Treasury’s use within the required timeframe. The federal landowner must be willing to transfer the site to the Treasury or establish a land use agreement.

• Parcel Size: The site must include at least 100 acres of land of suitable configuration to construct the CPF and provide for its security/setback requirements.

• Developability: The site must not be unduly constrained to development due to terrain or other construction or use limitations.
Site Location

Location Map

BEP Currency Production Facility Site

FDA Muirkirk

Greenbelt

Bowie

Silver Spring

College Park

New Carrollton

Washington D.C.
The Washington, DC production facility (DC facility), built in 1914, has been in operation for more than 100 years.

As BEP’s currency production has modernized and added more complex processes and security features, the existing facilities are no longer able to support an efficient, secure, and innovative manufacturing process.

Approximately 300-400 personnel and a public tour will remain in a renovated Main Building.
Deficiencies of Existing Facility

**Building Inefficiencies**
- Incorrect type of space for emerging print equipment and security feature technologies
- 107 year old facility designed for antiquated production processes
- Equipment on multiple floors and in two separate buildings
- Remote material storage warehouse due to storage limitations
- Inefficient structural system for placement of larger production equipment

**Health & Safety**
- 70% of worker injuries attributed to materials handling

**Security**
- High Risk due to urban location
- Multiple vehicle and personnel entrances
- Limited setback distance from vehicle explosives
- Historic building status limits blast hardening/progressive collapse improvements
Transportation Context

Adapted from Transportation Impact Study. All boundaries approximate.
The Transportation Impact Study (TIS) was completed on 6/30/20

- 15 total intersections studied (approved by MNCPPC in Scoping Agreement)

- Study included BEP Employee Survey to identify possible future travel routes

- Impacted locations were identified for potential mitigation

- Project team will continue to assess and coordinate with local agencies in order to pursue mitigation strategies
Location
Land Use
Landforms

Major Landforms
- Primary Ridgeline
- Secondary Ridgeline
- Hillside Bottom Edge
- Ridge
- Knob
- Plateau
- Side Slopes
- Bowl

Adapted from GIS open data. All boundaries approximate.
Resources

Landscape Resources

- Jurisdictional Wetland & Buffer
- Wetland & Buffer
- Unnamed Intermittent Stream
- Specimen Trees (good or very good condition)
- Reforestation Area/Conservation Easements
- Delineated Forest Stand

Vicinity of Phase I Archeological Area

Studies, surveys, and delineations ongoing. All resource locations approximate.
Landscape Character

Cropland Looking Toward Forest
BARC Site, June 2020

Open Meadow with Tree Clusters
BARC Site, June 2020
Landscape Character

Wet Meadow
BARC Site, June 2020

Rolling Terrain / Copse of Trees
BARC Site, June 2020
Poultry Road Looking North
Site Amenity & Restoration Opportunities

Pedestrian Path, U.S. National Arboretum

Existing Stream Culvert, BARC Site, June 2020

Restored Wetland

Restored Stream
Guiding Principles
Balance: Security, Flexibility, and Efficiency

1. Security
Enhance the quality and effectiveness of security on campus and within the new facility. Design will provide best-in-class protection for manufacturing U.S. currency, its staff, and its visitors.

2. Future-proofing & Flexibility
Fabricate a state-of-the-art facility for the production of U.S. banknotes capable of accommodating rapid changes in printing technologies, processes, security threats, and shifts in future workplace.

3. Health, Wellness, & Safety
Design a new campus that meets production needs while enhancing workplace safety and quality of life for employees. Create a sense of community that embraces the 105-acre BARC site and attracts workforce talent for decades to come.

4. Institutional Identity
Build a discreet but distinctive facility that echoes the stature, security, and innovation of the U.S. banknote. Utilize the site to create a destination that invites visitors to learn about the production and history of US money. Design the building and site to blend in and communicate environmental sustainability to neighbors, visitors, and staff.

5. Operational Efficiency
Construct a high-performing and automated manufacturing facility that tracks the supply chain of materials and products, reduces Work In Progress (WIP), and utilizes building systems that are easily maintainable. Look globally at BEP’s production and beyond to shape the most efficient and cost-effective currency manufacturer worldwide.

6. Technology & Process Innovation
Provide innovative solutions to accommodate evolving technology, reduce counterfeiting threats, and protect the environment.

7. Budget Compliance
Ensure lasting value of the project by tracking and calibrating design decisions through every phase.

8. Timeliness & Schedule
Establish rapid delivery of intelligent design that is on time in every phase through to construction.

9. Sustainability & Environment
Respect the agricultural character of the site by minimizing site disturbances, reducing production waste streams, and maximizing green space. Generate sustainable campus-wide strategies to promote energy efficiency while balancing costs.

10. Workforce / Workplace
Promote BEP as a workplace of choice with shared core functions, collaboration spaces, and conferencing areas. Provide workplace and support spaces with daylight and access to nature to attract current and next generation workforce.
Initial Studies: Building Disposition

**Scheme A**
+ Site as extension of eastern forest area

**Scheme B**
+ "Main Street" circulation as unifying feature of administrative wing

**Scheme C**
+ Relationship of major program components to the site and to each other
Building Organization
Proposed Site Plan

Building
• Area - 921,600 square feet
• Height – varies, maximum is 40-50 feet

Site
• All parking spaces will utilize permeable pavement
• 50% of the main roof will be a green roof.
• Building placed to avoid wetlands (south) and forested areas (north and east)

Number of employees* 1,427

Parking Spaces 1,234

* total number of employees in 3 shifts.
Proposed Ratio

Number of employees 1,427
- Day shift (6:30a to 3pm) 1,138
  - 884 production and 254 admin
- Evening shift (2:30pm to 11pm) 168
- Midnight shift (10:30pm to 7:00am) 166

Parking Spaces 1,234
- 1,184 employee spaces
- 30 visitors spaces
- 20 VIP spaces

Parking Ratio
1,184 spaces/1,304 employees = 1.10 (parking ratio)
Parking Ratio Justification

- Site is approximately 2 miles away from Metro station and there are no dedicated sidewalks or pathways connected to the site.
- Metro opens at 5:00am and the first shift (production/production support shift) need to be parked, changed into work clothes, receive any information from other shift and at their station by 6:30am.
- Employees will normally arrive at the site between 5:30am and 6am to give them time to get ready before their shift begins.
- These start times are set by the employee unions and would be difficult to change.
- BEP told us Metro is not really an option for this site because if production employees miss the first train (or if it is delayed) or the USDA bus connecting them to the site is delayed this would affect their production line.
- As indicated by this map, most of the staff is from southern Prince George’s County and Charles County, MD and would need to ride the entire trip on Green Line then take a bus trip. And for the staff in Virginia, they would need to change trains and then take a bus which would add to the travel time and increase the possibility of being late.
- If the 1st shift employees are not ready to go when the midnight shift is finished, they will have to stop the presses, which causes production waste and increases production cost.
Preliminary Section
Site Circulation
Entrance Circulation
Entrance Facilities
Building Entrance
Interior Perspective
Current View

North Dairy Road facing Northeast

Key Plan
Proposed Concept Design

North Dairy Road facing Northeast

Key Plan
Photo-Simulation Comparison – Odell Road

Current Condition

Proposed Facility
Photo-Simulation Comparison – Odell Road
Stormwater Management

Design Requirements to be met:
- MDE Environmental Site Design (ESD)
- EISA Section 438

Design (BMP) Strategies:

- **Green Roof**
  - +/-50% of main building & out buildings

- **Rainwater Harvesting**
  - Cisterns - harvesting rooftop runoff
  - Reuse inside of building (cooling tower & gray water)

- **Permeable Pavements**
  - Permeable pavers - in parking stall areas
  - Reinforced Turf - in rarely used vehicular areas

- **Micro-bioretention**
  - Interspersed throughout site

- **Bio/Grass Swales**
  - Along access roads

- **Submerged Gravel Wetlands**
  - Topographically low corners of site
Attachment A - NCPC letter on Draft Environmental Impact Statement
December 21, 2021

Mr. Harvey Johnson  
Program Manager  
ATTN. Bureau of Engraving and Printing (BEP) Project EIS  
US Army Corps of Engineers, Baltimore District Planning Division  
2 Hopkins Plaza, 10th Floor  
Baltimore, MD 21201


Dear Mr. Johnson:

Thank you for the opportunity to review the Draft Environmental Impact Statement (DEIS) for the Bureau of Engraving and Printing (BEP) Currency Production Facility (CPF) located on a 100-acre parcel formerly part of the Henry A. Wallace Beltsville Agricultural Research Center (BARC) in Maryland. NCPC staff understands that the Department of Treasury, acting on behalf of BEP, proposes to construct and operate a new 24-hour CPF within the National Capital Region (NCR) to replace its existing production facility located in downtown Washington, DC. The Washington, DC production facility (DC Facility), built in 1914, has been in operation for more than 100 years. The DC Facility’s condition and design limit the BEP’s ability to modernize its operations and achieve its primary mission of producing increasingly technologically sophisticated US paper currency issued by the federal government.

As the federal planning agency for the National Capital Region, NCPC has a review authority over federal projects located in the national capital region (40 USC§ 8722 (b)(1)). Our interest is to ensure the plan for this new facility is consistent with policies contained within the Federal Elements of the Comprehensive Plan for the National Capital (Comprehensive Plan). We generally support the DEIS analysis of the new CPF under consideration at a former BARC site in Maryland and recognize that the Department of Treasury has studied this issue for more than 20 years “…to address the inadequacy of its current facilities in the NCR. Most recently, between 2010 and 2018, Treasury studied the current status of currency note production, how to reduce its operational footprint within the NCR, and how to modernize its currency production operations.” During this time Treasury explored various locations in the NCR, both private and public, to site this new facility. We understand that the BARC facility was eventually chosen because it met many mission requirements and was immediately available.

NCPC staff is generally supportive of the preferred alternative in the DEIS which includes a one million-square-foot facility on a 100-acre parcel within the BARC campus; however, we also acknowledge that this project will move approximately 1500 federal jobs from the District to Maryland. The Federal Workplace Element of the Comprehensive Plan includes policies that support maintaining a majority of the region’s federal employees within the District. While this move will not single handedly change that overall distribution, it will reduce the number of jobs in the District. Based on the DEIS, NCPC staff understands the Department of Treasury’s decision to relocate to Maryland was based on the need to improve the existing currency production inefficiencies that are a result of operating in the constrained multi-floor historic site downtown.
The requirements to modernize and make currency production more efficient include: a 100-acre parcel for the new facility, and the need for easy access to both highways and aviation networks. Given the change in location from the District to Maryland, NCPC will use the NEPA analysis to inform its review of the project and thereby requests that the DEIS adequately analyze impacts related to existing conditions and the proposed location. NCPC staff further note that every effort should be made to minimize impacts associated with the move to a less publicly accessible site and the change in land use at the BARC Campus. Our comments below focus on potential transportation, historic preservation, and natural resource impacts.

**Transportation**

This project, as a new industrial use in this formerly agricultural land, will necessitate an increase in the number of vehicles using local and interstate roadways in Maryland. In addition, the Department of Treasury proposes a 1,179-space surface parking lot for its employees. Treasury has generally conducted a sound transportation analysis exploring impacts to local roads and highways from employees and deliveries. This analysis also describes parking capacity at this new facility in response to NCPC’s parking ratio. The Transportation Element of the Comprehensive Plan identifies a parking ratio of one space for every two employees at facilities in the National Capital Region not near a Metrorail station, such as this proposed facility. The Department of Treasury is proposing a split parking ratio at this facility: (1) one space for each production facility employee and (2) one space per two administrative employees. The Comprehensive Plan allows deviations from the parking ratio guidelines, provided the applicant agency provides a strong rationale for the deviation. The Department of Treasury needs to request this parking ratio deviation when it submits the project for review.

Regarding commuting impacts, we recommend the DEIS include a comparison of the existing modal split from the current downtown site with the proposed modal split for the new facility to better understand the changes being proposed. This information is important to understand since the new facility will not be located near a Metrorail station and it will likely result in a change in commuter ridership and the number of single occupancy vehicles commuting to work.

It is also our understanding that the number of visitors anticipated at the facility is evolving. Initially, the Department of Treasury described that the only visitors to the facility would be VIPs. During the recent DEIS public meeting on December 2, 2020, Treasury officials described an educational component of the CPF allowing scheduled tours. As this was not expressly described in the DEIS or transportation analysis report, we are interested in understanding this more fully. In particular, please detail how many visitors are anticipated to visit this facility annually as it is unclear what impact these additional vehicles will have on the local transportation network. This should include a comparison of the CPF with similar sized facilities. Please also include a description of how this will be operated, given the existing BEP facility in Washington, DC is also used for tours.

According to the DEIS, this project will convert 46 acres (of the 100-acre site) from institutional, agricultural, and forested land into industrial use with a large 1,179-space impervious surface parking lot. As such, the Department of Treasury should do everything it can to minimize overall impacts. The Transportation and Federal Environment Elements of the Comprehensive Plan include clear policies recommending structured or below grade parking on federal campuses to reduce impacts associated with an increased impervious surface area – namely the potential for greater stormwater runoff and a potential increase in the heat island affect. In addition, a 1,179-space surface parking lot is not a welcoming/attractive entrance to this new facility. We highly recommend the Department of Treasury include an option for structured/below grade parking and the following additional analysis in the DEIS: a comparison of
environmental impacts including heat island, impervious surface, tree removal, and stormwater runoff related to a surface lot verses structured/below grade parking.

Historic Preservation

The DEIS describes the historic resources included on this campus and how the development of this new facility might affect them. The existing historic buildings on this part of BARC are contributing elements of the BARC historic district, but as they have been abandoned since the mid-1990s, they are in disrepair. These buildings have been marked for demolition. In addition, there are viewshed impacts from existing nearby historic resources within the BARC historic district. We understand that Treasury is developing a Memorandum of Agreement (MOA) pursuant to Section 106 of the National Historic Preservation Act to address the physical and visual impacts to historic resources.

As NCPC’s review of the project is not considered an undertaking for Section 106 purposes, we are not a signatory in the MOA. Given the poor condition of the existing historic buildings and inability for reuse as described in the DEIS, we would recommend Treasury explore the following mitigation in the MOA: update the historic documentation for the contributing buildings, include interpretive panels for the on-site employee trail, and/or add interpretation inside the building to be used for public visitors to the building.

Natural Resources

The DEIS describes existing conditions and proposed impacts regarding natural resources. We appreciate that the Department of Treasury and USACE developed and included tree and wildlife inventories for the proposed new CPF site. This facility will require the removal and the replacement of onsite trees. We would remind Treasury to make sure to review and follow the newly updated Tree Replacement policies in the Federal Environment Element of the Comprehensive Plan. In addition, we appreciate the DEIS describing how the building will include sustainable design strategies by attaining a LEED silver rating, installing rooftop solar panels as an alternative energy source, and meeting Section 438 of EISA using green infrastructure/low impact development measures on the campus. All these measures are supported by the Federal Elements of the Comprehensive Plan.

The DEIS states the BARC campus is a resting point for migratory birds along the East Coast of the United States, including some endangered species. The wildlife inventory does not include any permanent endangered species. Since protection of the migrating wildlife is important and this was a concern raised by several members of a local ornithological group during the public meeting on December 2, 2020, we would appreciate if Treasury could provide additional detail in the DEIS describing how this facility will mitigate wildlife impacts.

Coordination

Overall, staff understands the space requirements for this facility are significant and they limit the potential available sites in the NCR. The DEIS describes that BARC offered the only site that met the size requirements and was accessible to highways and airports. Given this a more intensive land use from the existing condition, we encourage the Department of Treasury and USACE to continue coordination with the local jurisdiction and adjacent neighborhood along Odell Road to identify additional mitigation measures to reduce the visual and transportation impacts.
These comments have been prepared in accordance with NCPC's Transportation, Environmental and Historic Preservation Policies and Procedures. We refer the Department of Treasury to NCPC's Comprehensive Plan for the National Capital to reference policies and guidelines for which this project will be evaluated against. The Comprehensive Plan and other NCPC plans/policies can be found on our website at www.ncpc.gov; hard copies are available if needed. Please feel free to contact Carlton Hart, the point of contact for this project, at 202-482-7252 or carlton.hart@ncpc.gov.

Sincerely,

Diane Sullivan

Diane Sullivan

Director, Urban Design and Plan Review Division
Attachment B - City of Greenbelt Letter
March 3, 2021

Carlton Hart
Urban Planner, Urban Design and Plan Review
National Capital Planning Commission
401 9th Street, NW, Ste. 500N
Washington, DC 20004
carlton.hart@ncpc.gov

Submitted via email to carlton.hart@ncpc.gov

Re: NCPC Project Referral - File # 8243 - Bureau of Engraving and Printing Currency Production Facility

Dear Mr. Hart:

Thank you for the opportunity to review the concept site and building plans for the proposed Bureau of Engraving and Printing Currency Production Facility (CPF) at the U.S. Department of Agriculture's Beltsville Agricultural Research Center (BARC).

The City has consistently affirmed its strong opposition to the proposed siting of BEP's currency production facility at BARC. The City continues to assert that the proposed relocation of the Currency Production Facility to the Beltsville Agricultural Research Center will have significant impacts on BARC, the human and natural environment, transportation, and the surrounding community. We would like to take this opportunity to reaffirm our opposition to Treasury's preferred location for this facility and our support of the No Build alternative.

To help convey our serious concerns with the project, we have attached our response to the Draft Environmental Impact Statement (DEIS) submitted to the U.S. Army Corps of Engineers on December 21, 2020. The City urges you to review the attachment, so you can understand how the DEIS fails to adequately evaluate and mitigate the impacts of the project. While the City maintains that the No Build Alternative is preferable, the following comments pertaining to the Concept Plan submittal are provided in response to NCPC’s request for review:

- The City continues to be concerned that Treasury failed to consider all reasonable alternatives in the DEIS, and as such, fails to consider all reasonable alternatives in the NCPC Concept Review. Further information pertaining to the City’s concerns regarding alternatives can be found in Section III of the City’s comments on the DEIS, attached.
The Concept Report fails to address the existing 1996 BARC Master Plan and discrepancies between the master plan and the current proposal. The City is concerned that the proposed development is not in keeping with the stated mission of BARC and the objectives of 1996 BARC Master Plan Update. The United States Department of Agriculture should consider updating BARC's master plan to ensure its accuracy in reflecting anticipated changes to the campus.

To provide a comprehensive view of the project in future submittals, it would be helpful for the applicant to address all areas of development in narrative and any associated calculations, including the site and the 18-acre area adjacent to the project site on which the new entry road and modifications to Powder Mill Road are proposed. Future submittals would also benefit by clearly addressing any revisions required for transportation mitigation and modification to utilities and the BARC East Wastewater Treatment Plant. A clear and comprehensive LOD should be defined.

The applicant should continue to explore opportunities to reduce the size of the CPF to minimize impact to sensitive environmental features onsite.

Further consideration should be given to building materials and architecture that will add interest to the building and that will blend with and complement the pastoral setting, as opposed to literally reflecting it.

Further consideration should be given to integrating structured parking into the design in ways that will meet project goals. For example, it may be possible to reduce the interior space for CPF operations to the minimum 800,000sf and re-allocate the excess interior space to structured parking within the shell of the main building or to building a parking structure that utilizes green walls to lessen the visual impact.

Further consideration should be given to possible modifications to the limits of disturbance (LOD) associated with the proposed entrance road upgrades to avoid diverting approximately 117 linear feet of the unnamed intermittent stream located on-site and in the area of the entry road, and to avoid removal of the maximum number of specimen trees in 'Very Good' and 'Good' condition.

Specimen trees on site should be retained during and after construction to the maximum extent possible. The City also reiterates comments detailed in Section XIII and Section IX.6 of the City's comments on the DEIS, attached.

It would be helpful for the applicant to submit copies of the jurisdictional determination (JD), forest stand delineation (FSD), and existing forest conservation easements and exhibits (or liber/folio, if applicable) to facilitate review. Additionally, the Forest Conservation Plan should be provided to reviewing agencies at the time it is submitted to Maryland Department of Natural Resources.

The City is concerned that impervious surface added for construction of the new entry road and for transportation mitigation at nearby intersections is not addressed. Per the 2020 Traffic Impact Study, proposed transportation mitigation will add over 340,000 square feet (i.e., approximately 8 acres) of new impervious surface for roadways.

The applicant should include additional information regarding compliance with applicable stormwater regulations, including impacts to hydrology in terms of
volume, quality, and temperature, and a complete break-out of current and anticipated nutrient and sediment loading for the project, as well as by drainage area and watershed. The applicant should clarify which jurisdiction will approve the stormwater management plan and sediment and erosion control plan. Additional details on concerns regarding stormwater can be found in Section XI of the City’s DEIS comments, attached.

- The concept plan depicts what appears to be a trail leading to a pavilion or overlook in the area of the large wetlands in the southeast portion of the site. Future submittals should clarify the nature of this proposal and provide details regarding any other outdoor amenities.
- The DEIS states that the applicant plans to achieve a LEED Silver rating. Future submittals would benefit by addressing the practices that would be implemented to achieve a LEED Silver rating.
- The applicant should develop a photometric plan to be reviewed during the next development review phase to address City concerns regarding lighting, as identified in Section XIV of the City’s comments on the DEIS, attached.
- Conformance with the requirements of the Prince George’s County Master Plan of Transportation and to the Prince George’s County Landscape Manual should be demonstrated.
- The applicant should explore alternative loading locations to reduce noise and visual impact to the residents of Odell Road.
- The applicant should explore ways to meaningfully and proactively engage owners and residents (including renters) of the 34 homes along Odell Road in determining mitigation measures to be incorporated in the development proposal. Further consideration should also be given to enhancing vegetative buffering to ensure maximum screening of construction activities from residential properties and roadways, as indicated in Section IX of the City’s comments on the DEIS, attached.
- Additional details regarding the agreement with the USDA to enable CPF employees to use the USDA shuttle from the Greenbelt Metrorail Station to Treasury’s proposed parcel, potentially including expanded shuttle service, which was referenced in the DEIS, should be included.
- Roadway impacts incurred during this Project should be reconstructed with all master-planned bicycle and pedestrian facilities.
- Plans for pedestrian and cyclist circulation should be developed and incorporated into the design of the site, the new entry road, and the modifications to Powder Mill Road. These plans should ensure both the safety and the comfort of the pedestrian and cyclist and minimize points of conflict with motorists.
- Serious consideration should be given to accommodations that will both enable and encourage alternative modes of transportation (pedestrian, bicycles, and electric vehicles), such as bike parking/lockers, shower facilities, and electric vehicle charging stations.
- Proposed transportation mitigation should be clarified, and all associated impacts to sensitive environmental features should be identified. Necessary field work, including wetland delineations, should be completed.
• The City is concerned that traffic impacts generated by the proposed CPF, combined with traffic impacts generated by the possible proximal siting of a Baltimore-Washington SCMaglev Trainset Maintenance Facility (2 of 3 possible TMF locations are on BARC), have the potential for significant adverse impact on traffic in and around the City. The SCMaglev is proposed to be constructed during the same timeframe as the CPF, and the SCMaglev project sponsor "has provided preliminary estimates of approximately 400 to 500 vehicle arrivals and departures on a daily basis at each of the TMF Alternatives" (Baltimore-Washington Superconducting Maglev DEIS Appendix D.2A9.4). Treasury should coordinate with the Federal Railroad Administration and other relevant parties to determine appropriate mitigation at affected intersections. The City has expressed additional serious concerns regarding traffic and transportation, as outlined in Section XVI of the City's DEIS review comments, attached.

In closing, the City urges the NCPC to join the City in its support of the No Build alternative. Thank you for the opportunity to comment. If you have any questions please contact Terri Hruby, Director of Planning and Community Development, at 301-345-5417.

Sincerely,

Colin A. Byrd
Mayor

Emmett V. Jordan
Mayor Pro Tem

Leta M. Mach
Council Member

Edward V.J. Putens
Council Member

Judith F. Davis
Council Member

Silke I. Pope
Council Member

Rodney M. Roberts
Council Member
Attachments:
City of Greenbelt DEIS cover letter
City of Greenbelt DEIS comments

c:
Senator Ben Cardin
Senator Chris Van Hollen
Majority Leader Steny Hoyer
Senator Paul Pinsky
Delegate Anne Healey
Delegate Alonzo Washington
Delegate Nicole Williams
County Executive Angela Alsobrooks
Council Member Todd Turner
Council Member Thomas Dernoga
Chairman Elizabeth Hewlett, Prince George’s County Planning Board
Greenbelt City Council
Nicole Ard, City Manager
David Moran, Assistant City Manager
Terri Hruby, Director of Planning & Community Development
Mr. Chuck Davis, BEP
Dr. Howard Zhang, BARC
Mr. Chris Bentley, BARC