



## Information Presentation

Commission Meeting: February 4, 2021

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**PROJECT**

**Bureau of Engraving and Printing -  
Currency Production Facility**

Poultry Road and Powder Mill Road  
Beltsville, Maryland

**SUBMITTED BY**

United States Army Corps of Engineers, and  
Bureau of Engraving and Printing

**PRESENTER**

Carlton Hart

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**NCPC FILE NUMBER**

8243

**NCPC MAP FILE NUMBER**

3212.10(00.00)45264

**REVIEW AUTHORITY**

Advisory  
per 40 USC 8722 (b)(1)

The United States Army Corps of Engineers (USACE), in coordination with the Bureau of Engraving and Printing (BEP), submitted a proposed new Currency Production Facility for concept review at the Commission's April 2021 meeting. The purpose of this Information Presentation is to introduce the Commission to the new BEP Currency Production Facility (CPF), its purpose, and the goals of the project. NCPC staff submitted a comment letter to USACE on the Draft EIS for the project in December 2021. A copy of that letter is attached to this report for reference.

BEP is an agency within the United States Department of the Treasury. Its mission includes manufacturing U.S. 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 these consist of approximately 1,600 full-time staff. The BEP currently operates two currency production facilities in the country: (1) one in downtown Washington, DC constructed in 1914 and (2) another in Fort Worth, Texas, constructed in 1990. There is also a 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 located 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.

USACE is the agency contracted to lead the effort to develop this site, on behalf of BEP. USACE notes the proposed CPF will provide the Department of the Treasury with an advanced, efficient, and secure space for the design and production of currency. The project will consist of a primary building with a footprint of approximately one million square feet and a height of 40-50 feet, along with a series of security access control buildings at the site entrance off Powder Mill Road to the South. 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.

Staff met with the USACE and BEP representatives for over a year to understand this project and to relay NCPC's comprehensive plan policies as they began initial site planning. Recently staff reviewed the BEP Currency Production Facility Draft Environmental Impact Statement which evaluated two alternatives: a new currency production facility with associated parking and access roads and a no build alternative. Staff comments on the Draft EIS are primarily focused on conformance with the Workplace, Transportation, Historic Preservation, and Environment Elements of the Comprehensive Plan. The staff comment letter highlights concerns related to:

- Compliance with the parking ratio since the 24-hour production facility will need a parking waiver;
- The proposed surface parking lot which is not aligned with the Comprehensive Plan's policy to construct 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.

Next steps include the review of the concept design for this facility at the Commission's April 2021 meeting. Staff referred this project to the state and local agencies in January for their comments. USACE anticipates the EIS will be finalized with a signed record of decisions (ROD) during the summer 2021. The preliminary design submission is scheduled for Fall 2021 and the final design submission will likely be in 2022.

ATTACHED:

- NCPC staff comments on the BEP Currency Production Facility Draft Environmental Impact Statement – Dated December 21, 2020

## PROJECT TIMELINE

<b>Previous actions</b>	<b>None</b>
<b>Remaining actions</b> (anticipated)	– Approval of preliminary site and building plans (Fall 2021) – Approval of final site and building plans (Spring 2022/)

NCPC File No. 8243

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

RE: NCPC comments on the Draft Environmental Impact Statement for the Bureau of Engraving and Printing, Currency Production Facility

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](http://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](mailto:carlton.hart@ncpc.gov).

Sincerely,

*Diane Sullivan*

Diane Sullivan

Director, Urban Design and Plan Review Division