

Save the Research Center from Industrial Development

The Henry A. Wallace Beltsville Agricultural Research Center, otherwise known as BARC, is a 6500 acre agricultural research facility. As of 2012 it was the largest agricultural research facility in the world. But did you know that BARC as we know it was a New Deal project?

In the 1700s BARC land was a plantation called Walnut Grange, owned by colonists and worked by enslaved persons. The land continued to be farms and woodland until purchased by the Department of Agriculture in 1910. Development greatly expanded during the 1930s. Several New Deal agencies were involved in this massive project to build a state of the art agricultural research facility. 2,238 men constructed offices and laboratories throughout the property. They built animal pens, barns and fences, as well as storage facilities and specialized experimental facilities. Under this project, a wide variety of general improvement work was done, including clearing land, installing drainage, reforestation, constructing erosion control devices, clearing stream channels, constructing secondary roads, placing water mains and many other activities. As you drive down Powder Mill Road you should be aware that the stately old laboratory buildings, the lush fields of grain, the picture perfect copses of trees and the contoured road are no accident. They reflect the landscape design and zeitgeist of the 1930s. As such BARC is as worthy of historic preservation as the New Deal buildings and Forest Preserve of Old Greenbelt.

Over the past 100 years BARC has been on the forefront of agricultural and human nutrition research. They have had many important breakthroughs, however, more importantly, their scientific findings steadily contribute to the incremental accumulation of scientific knowledge. BARC discoveries have impacted all agricultural aspects of our prosperity, and BARC scientists continue to make contributions that impact agriculture around the world. Just a few of their current research groups comprise microbial and human food safety, sustainable perennial crops, hydrology and remote sensing, animal parasitic diseases, and bee research.

Despite its agricultural mission, various agencies such as NASA and FDA have steadily chipped away at research center property. These facilities also have in general a research or informational mission. However, the Department of the Treasury is planning to build a 1,000,000 ft.² industrial plant for printing currency. They are taking 122 acres and using thousands of gallons of water per day out of Beaver Dam Creek for the manufacturing process. Aside from the 50 ft. high plant itself, there will be a steady flow of diesel armored trucks traveling on BARC roads to move money and bring supplies. There will be approximately 1600 employees working three shifts. The plant will operate 24 hrs per day and seven days a week. This facility is not in keeping with the mission of BARC. The water pollution and environmental destruction caused by this facility will be devastating to the local environment, including the many animals and plants that have been thriving in the area for the past 100 years.

The combined area of the Beltsville Agricultural Research Center and the Patuxent Wildlife Center comprises the largest undisturbed tract of forested land close to the Nation's Capital. It is home to many endangered plant and animal species. It is crossed by several migratory bird corridors. This area is known as the lungs of the mid Atlantic region.

Treasury has not adequately considered the effects of this project on the environment of BARC or on the people living in surrounding neighborhoods. What about the impact of breathing diesel fumes and construction dust 24 hours a day, both at home and in school? The building site is a quarter mile from Vansville Elementary and numerous single family homes.

As required by law, the Treasury Department has written an environmental impact statement. However, the EIS is suited to their needs, and is woefully inadequate. Many important questions have not been answered. Such as; Why did Treasury fail to consider any other less environmentally sensitive sites? Surely there are places more suitable in the area than this land. Treasury based their assessment on an ever growing need for cash. Why haven't they considered the diminishing use of cash because of the rise in non-cash payments? Have they checked for burials of enslaved persons or other archaeological artifacts? What will a lighted 10 ft perimeter fence around this high security facility look like? It certainly would not be in keeping with the other buildings on BARC. They say they will replant some trees, however It will take decades to replace the 300 large trees scheduled for removal. Why not choose a cleared site?

This printing factory is designed to put 120,000 gallons of waste water per day through the BARC East Waste Water Treatment Plant, which has had hundreds of clean water act permit violations over the past two years. The contaminated water, even if in compliance with law, will contain chromium, zinc, oils, inks and solvents that will flow into Beaver Dam Creek. The BARC eagles fish in Beaver Dam Creek. After 40 years of restoration efforts, mainly by concerned citizens, the lower Anacostia watershed is beginning to support native plants and fish. That progress is certainly imperiled.

The multicolored bat, which has been found on this property, is scheduled to be listed as endangered. Why have they made no plans to protect them? The project land is currently filled with nesting birds and animals. On the proposed property and on other areas of BARC, beginning in the 1970s, BARC scientists and volunteers built nesting boxes that saved the bluebird from extinction. Yet this year caretakers of the bluebird boxes have already been asked to remove them. The eagles nest, where three eaglets successfully fledged last fall, is also less than half a mile from the building site. Birders have observed eagles foraging on the proposed site. What will parking lots lit through the night, constant diesel and traffic fumes and construction dust do to them? Treasury has ignored these issues, and has failed to consider the impact of this project upon humans, wildlife and vegetation.

Building this facility will pollute the air and water. It will damage the local ecosystem and result in the compromised health of residents as well as death to many animals and plants. It opens the door to more industrial development on BARC. Why damage an area that is home to endangered species and natural areas that have been undisturbed for over 100 years? BARC is an environmental gem, a historic New Deal created scientific community of outstanding natural beauty. Treasury would do better to find an already industrialized site.

Paid for by Friends of the Beltsville Agricultural Research Center.

**CONSTRUCION AND OPERATION OF A CURRENCY PRODUCTION FACILITY AT
BELTSVILLE AGRICULTURAL RESEARH CENTER**

DRAFT ENVIRONMENTAL IMPACT STATEMENT

CITY OF GREENBELT’S COMMENTS

DECEMBER 14, 2020

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I. Purpose and Need

Section 102 of the National Environmental Policy Act (NEPA) requires a federal agency to include a detailed statement on the environmental impacts of the proposed action, any adverse environment effects which cannot be avoided should the proposal be implemented, and alternatives to the proposed action. 42 U.S.C. § 4332(C). To comply with Section 102, an Environmental Impact Statement (EIS) must “briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives.” 40 C.F.R. § 1502.13 (2019); *see also* 40 C.F.R. § 1502.13 (2020).¹ The Purpose and Need Statement sets the parameters for the range of alternatives that the agency will consider in the EIS. *See Citizens Against Burlington, Inc. v. Busey*, 938 F.2d 190, 195-96 (D.C. Cir. 1991). A Purpose and Need Statement must allow an EIS to be more than a “foreordained formality,” *Id.* at 196. Further, a Purpose and Need Statement premised on false or inaccurate information fails to provide a basis for “informed evaluation or a reasoned decision,” and therefore does not satisfy NEPA’s requirements. *Sierra Club v. U.S. Army Corps of Eng’rs*, 701 F.2d 1011, 1030 (2d Cir. 1983). NEPA requires that an EIS contain high-quality information and accurate analysis. *See* 40 C.F.R. §§ 1500.1(b), 1502.24 (2019); 40 C.F.R. § 1502.23 (2020).

The Purpose of the proposed Bureau of Engraving and Printing’s new Currency Production Facility (CPF) (Project) facility is to “construct and operate a new, up to 1 million square-foot CPF on a minimum 100-acre parcel of federally owned.” DEIS, ES-2. The purpose statement includes the stipulation that the site must be a minimum of 100 acres but provides no justification for this minimum acreage. The DEIS indicates that International Security Committee (ISC) security and setback requirements factor into the site area requirements, but it is not clear how this specific setback was established, and no supporting information is provided.

Additionally, the Need statement refers to the existing CPF as “obsolete” and unable “to support modern currency production”, but the 2018 Government Accountability Office (GAO) report *Bureau of Engraving and Printing: Operations for and Costs of a Future Currency Production Facility*, which is referenced throughout the DEIS, indicates that a renovation of the existing facility may address these issues, even if it is not the preferred alternative: “BEP officials have stated that if BEP does not receive [...] legal authority and funding, it will begin a renovation of the current D.C. facility.” Page 1. This indicates that the existing CPF is not operationally deficient.

¹ The Council on Environmental Quality (CEQ) recently revised its regulations implementing NEPA. *See* Update to the Regulations Implementing the Procedural Provisions of the National Environmental Policy Act, 85 Fed. Reg. 43,304 (July 16, 2020). These comments identify problems with the DEIS’s compliance with NEPA. The new regulations are also already subject to four lawsuits, and some or all of the changes may be found unlawful. *See* Compl. for Declaratory and Injunctive Relief, *California v. Council on Env’t Quality*, No. 3:20-cv-06057 (N.D. Cal. Aug. 28, 2020); Compl., *Env’t Just. Health All. v. Council on Env’t Quality*, No 1:20-cv-06143 (S.D.N.Y. Aug. 6, 2020); Compl., *Wild Va. v. Council on Env’t Quality*, No. 3:20-cv-00045-NKM (W.D. Va. July 29, 2020); Compl. for Declaratory and Injunctive Relief, *Alaska Cmty. Action on Toxics v. Council on Env’t Quality*, No. 3:20-cv-05199 (N.D. Cal. July 29, 2020). These comments raise issues with the DEIS’s compliance with both the old and new regulations and therefore cite to both regulations.

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The assumptions underlying the 100-acre parcel requirement and claim that a renovated CPF cannot support “modern currency production” are faulty, not supported by the information provided in the DEIS, and render the purpose and need fatally flawed. Previous screening criteria specified a site of a minimum 60 acres, and while the DEIS states that “standards and specifications [...] had evolved over this time,” DEIS, 2-13, it is unclear what the change is that would increase site area requirements by more than 50%. Further, the Biological Resources portion of the DEIS indicates that 21.9 acres of the site will not be utilized in the operational footprint or construction limit of disturbance (LOD). The Project Purpose and Need must be revised so that it is not premised on false or inaccurate information. A revised Purpose and Need will also require reevaluation of the alternatives developed and the associated screening criteria, as is discussed in more detail in Section III below.

II. The Future of Paper Currency

The proposed Project is based on inaccurate paper currency demand assumptions, violating NEPA’s requirement that an EIS contain high-quality information and accurate analysis. *See* 40 C.F.R. § 1500.1(b) (2019). To substantiate a future need for paper currency, the main product of the CPF, the DEIS reports that the Federal Reserve predicts demand for cash will increase over the next decade; however, this prediction was reported in early 2018, and the CPF is not planned to be fully operational until 2029 – one year past the decade-long time horizon. Additionally, the basis for the Federal Reserve’s prediction is not provided. The GAO report in which this prediction is published does not substantiate the Federal Reserve’s prediction, but rather restates it. The GAO instead outlines the “several indications that currency demand will not *substantially decline* within the next decade [emphasis added]” in the United States. There are also those who believe paper currency is becoming obsolete. For example, in an interview on November 30, 2020, when asked about the payments landscape over the next decade, Gary Cohn, former Director of the National Economic Council and chief economic advisor to the President, stated “I think cash can easily disappear. The idea of paper currency in the legitimate world is becoming more and more obsolete, and I believe it can become totally obsolete.” Additional information regarding the demand for paper currency through the anticipated life of the Project should be included in the DEIS.

III. Alternatives Considered

The Department of Treasury (Treasury) failed to consider all reasonable alternatives in the DEIS, making the alternatives analysis inadequate. The alternatives analysis is the “heart” of an EIS. 40 C.F.R. § 1502.14 (2019). NEPA requires that an agency “[r]igorously explore and objectively evaluate all reasonable alternatives” to the proposed action. 40 C.F.R. § 1502.14(a) (2019) *see also* 40 C.F.R. § 1502.14(a), (b) (2020). An agency must consider a range of alternatives “sufficient to permit a reasoned choice among the options.” *Wyoming v. U.S. Dep’t of Agric.*, 661 F.3d 1209, 1243 (10th Cir. 2011) (quoting *Ass’n Working for Aurora’s Residential Env’t v. Colo. Dep’t of Transp.*, 153 F.3d 1122, 1130 (10th Cir. 1998)); *see also Sierra Club v. Watkins*, 808 F. Supp. 852, 872 (D.D.C. 1991) (agency is required to “consider a range of alternatives that covers the full spectrum of possibilities”). The DEIS, however, fails to consider reasonable alternatives to the Project, examples of which are discussed below, and is therefore inadequate. *See Citizens for a Better Henderson v. Hodel*, 768 F.2d 1051, 1057 (9th Cir.

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1985) (“[T]he existence of a viable but unexamined alternative renders an environmental impact statement inadequate.”).

The DEIS compares the No Action Alternative with one CPF location and design. The screening process outlined in the DEIS and information contained in the Final Scoping Report demonstrate that multiple alternatives were screened out prior to and outside of the NEPA process. This precluded the required evaluation of all reasonable alternatives. The DEIS claims that the proposed action at the U.S. Department of Agriculture’s (USDA) Henry A. Wallace Beltsville Agricultural Research Center (BARC) is the only reasonable alternative that satisfies Treasury’s Propose and Need and selection criteria. The DEIS states that, “31 sites (see Figure 2.3-1) met their minimum criteria, including 25 privately owned sites (on 22 private parcels) and six federally owned sites.” DEIS, 2-13. The DEIS further explains that all but one site, the BARC site, were screened out. All private sites were screened out because they were not on federal land and five of the remaining federal sites were screened out because they did not meet one or more screening criteria. NEPA does not mandate that an EIS consider any specific project alternatives. At the same time, however, it does not allow an agency to eliminate alternatives “merely because they do not offer a complete solution” to the purpose and need of the proposed Project. *Nat. Res. Def. Council v. Morton*, 458 F.2d 827, 836 (D.C. Cir. 1972).

Treasury eliminated five of the six remaining federal site alternatives because those alternatives did not meet one or two specific aspects of the Purpose and Need of the Project, even though the agency admitted that those alternatives met other aspects and even though the BARC alternative selected failed to meet all aspects. Additionally, the rationale provided to support dismissal of these five alternatives is insufficient to provide meaningful public review and comment. The explanation of why each of these five federal sites were dismissed is explained in under one page and provides no supporting information. Treasury asks the public to simply take their word for it. The DEIS includes among the listed references a report on the initial site investigation process, *Federal Agency Initial Site Investigation and Screening*, but has not made this document available to the public, precluding public review and comment in violation of NEPA. GSA (2015). See 40 C.F.R. § 1502.21 (2019) (“No material may be incorporated by reference unless it is reasonably available for inspection by potentially interested persons within the time allowed for comment. Material based on proprietary data which is itself not available for review and comment shall not be incorporated by reference.”); 40 C.F.R. § 1501.12 (2020); see also *id.* §§ 1500.3(b), 1503.4(a), 1505.2(b) (2020). For these reasons, and those listed below, Treasury improperly eliminated alternatives that could have met some purposes of the Project.

1. **Screening criteria do not include environmental concerns.** The initial and final screening criteria listed in the DEIS does not appear to include any consideration of environmental concerns, despite Treasury’s NEPA Regulation (Treasury Directive 75-02) requiring that “The Department of the Treasury (Treasury) will consider environmental quality as equal with economic, social, and other relevant factors in program development and decision making processes.”
2. **Alternative analysis omits other site designs at Treasury’s Alternative site.** The DEIS considers only one conceptual site design at one location, and further caveats that this design is subject to change in final engineering and design. The Draft Finding of No Practicable Alternative (FONPA) submitted with the DEIS states that “Three site configurations were

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evaluated by the design team” at Treasury’s Preferred Alternative site, but it appears these have not been made available to the public, and they are not treated individually in the DEIS. The DEIS lists among the references a layout and utility study report, *Conceptual Site Layouts and Utility Study, Beltsville Agricultural Research Center*, but this report has not been made available to the public. BEP (2020b). The DEIS also fails to disclose that multiple site configurations are/have been considered by the project team. A review of the conceptual rendering provided in the DEIS reveals opportunities exist to reduce and reconfigure the proposed development to minimize impact to wetlands and waterways, cultural resources, noise levels and lighting, viewshed, etc. For example, alternative site design(s) at Treasury’s Preferred Alternative site could consider structured parking, facility of different size (e.g., meeting Treasury’s maximum versus minimum floor area), variations in facility orientation, variation in loading zone location, etc. During the public scoping period, the U.S. Environmental Protection Agency (EPA) made additional suggestions to incorporate Green Infrastructure/Low Impact Design into the design. These comments do not appear to have been addressed.

3. **Public input not considered regarding alternatives.** Various commenters, including the City of Greenbelt and the EPA, indicated during the public scoping period that additional alternatives should be considered. Because seemingly reasonable alternatives were eliminated prior to the DEIS, the public and decision-makers are unable to understand the relative impacts to the human environment of, for example, retrofitting the existing BEP facility for another fifty years (the anticipated life of the Project) or redeveloping an existing industrial site within the National Capital Region (NCR). At a minimum, the City believes it would be appropriate for Treasury to include analysis of three additional alternatives: the two federal facilities purported to have been dismissed from consideration based on size alone (the Olney Federal Support Center and the Plant Introduction Center), and the Landover Mall, which was specifically referenced in multiple comments during the scoping period. The DEIS could also include different site design proposals for Treasury’s Preferred Alternative site.

IV. Project Site Boundary

The DEIS and supporting materials provide conflicting information on the Project Site boundary. For example, the Bat Survey and the Cultural Resources Technical Memorandum Appendices show a larger project site than the figures provided in the body of the DEIS. The project site appears to have been reconfigured. If a reconfiguration has occurred during the preparation of the DEIS and background materials, this information should be clearly disclosed in the DEIS. Any impacts on analyses and findings should be identified and addressed, along with any implications for implementation of regulations, such as the Maryland Forest Conservation Law. A copy of the legal description and map of the parcel of real property to be transferred from USDA to Treasury per Section 7602(b) of the 2018 Farm Bill, including metes and bounds, should be provided with the DEIS.

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V. Region of Influence Designations

In many instances, the rationale for an identified Region of Influence (ROI) is unclear. The DEIS should provide a brief justification or re-evaluation of the ROIs identified. This is particularly true when the ROI is a simple Euclidean buffer on the project site. Examples include:

1. The ROI for **pedestrian impacts** is 0.25 miles in all directions of the project site, and the ROI for **bicycle impacts** is one mile in all directions of the project site. In this instance, it is unclear why a network analysis has not been used (especially if the intersection of Odell Road and Poultry Road is to remain closed).
2. The ROI for **Land Use** which, like the bicycle impact ROI, is a one-mile Euclidean buffer on the project site, including the area of the proposed roadway. CEQ's publication, *Considering Cumulative Effects Under the National Environmental Policy Act* (CEQ, 1997), provides possible geographic boundaries for different environmental resources. For Land Use, the geographic boundaries suggested include "Community, metropolitan area, county, state, or region." The ROI identified does not correspond to any of these suggestions and does not reflect any unified geographic area, and therefore appears arbitrary. As the project site is located in the National Capital Region and in Maryland, the City believes it would be useful to use three Land Use ROIs: 1) an NCR ROI, 2) an ROI based on relevant Maryland case law to determine a cohesive and defensible neighborhood, and 3) BARC's Central Farm. Maryland rezoning case law indicates that neighborhoods should be determined by patterns of development, physical boundaries, and existing natural features that appear to be natural breaking points.
3. The ROI provided for **Biological Resources** (including **vegetation, wildlife, and migratory birds**) is also a 1,500-foot buffer on the project site. Ecosystem, habitat, and natural connections are not addressed in this determination. More appropriate ROIs include:
 - o Vegetative Resources: Watershed, forest, range, or ecosystem,
 - o Resident Wildlife: Species habitat or ecosystem,
 - o Migratory Wildlife: Breeding grounds, migration route, wintering areas, or total range of affected population units.²

VI. Environmental Consequences and Significance

40 C.F.R. § 1502.16(a) and (b) (2019) requires that the Environmental Consequences portion of the EIS must include a discussion of both direct and indirect effects and their significance. *See also* 40 C.F.R. § 1508.1(g) (2020). Per 40 C.F.R. § 1508.27 (2019), "'Significantly' as used in NEPA requires consideration of both context and intensity". It also states, "Both short and long-term effects are relevant" in determining significance.

In many instances, it appears that significance thresholds have been defined too narrowly to allow for recognition of all significant adverse impacts, or they fail to consider component parts of the definition of "significantly" per 40 C.F.R. § 1508.27 (2019) or "effects" per 40 C.F.R. § 1502.16 (2019). For example:

² CEQ's publication, *Considering Cumulative Effects Under the National Environmental Policy Act* (CEQ, 1997). Construction and Operation of a Currency Production Facility at the Beltsville Agricultural Research Center

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1. **Significance thresholds are defined too narrowly.** This can cause adverse impacts to be overlooked. One example of this is provided in the Wildlife section of this memo (item #1); however, this issue was identified throughout the DEIS.
2. **Short-term effects are discounted.** Per 40 C.F.R. § 1508.27 (2019), “Both short and long-term effects are relevant” in determining significance; however, bike and pedestrian impacts are only identified as “significant” if they “Result in *long-term* closure or loss of sidewalks, trails, lanes, or other facilities used by pedestrians or cyclists to access frequently visited locations [emphasis added]”. The DEIS states that there would be temporary closures to the bicycle shoulder on Powder Mill Road during construction which would be restored once Powder Mill Road modifications were completed. The DEIS considers these impacts *less-than-significant*. The City believes that a more accurate assessment would identify these impacts as “short-term adverse effects”, but the significance threshold the DEIS established for pedestrian and bike facilities only recognizes the significance of long-term closures. The idea that short-term impacts are less significant appears throughout the DEIS.

Additionally, the DEIS does not consistently categorize the anticipated type (“direct” and “indirect”), and duration (“short-term” and “long-term”), but rather opts to separate environmental consequences by those incurred during “Construction” and “Operation”. This formula can inadvertently obscure impacts. For example, the DEIS recognizes that the proposed diversion and/or filling of 226 linear feet of streams will have a *potentially significant adverse impact*. The DEIS lists this under Construction impacts but does not explicitly state whether this impact is considered to be short- or long-term, direct or indirect; thus, it is later possible for the DEIS to claim, under the Operation impacts, that “in the long term, the Proposed Action would have *no impacts* to on-site surface water.” In this example, no consideration of possible direct, long-term adverse effects due to impacts to on-site streams is given.

The methodology for each technical resource area must be thoroughly examined to ensure the requirements of 40 C.F.R. §§ 1502.16 and 1508.27 (2019) are being met. Broader significance thresholds and identification of the category, duration, and intensity of impacts, similar to the methodology used in the Traffic Impact Study (TIS) submitted with the DEIS, could be used to address issues identified above. It is anticipated that this would also necessitate revisions in analyses and findings.

VII. Land Use and Zoning

The DEIS claims that the Proposed Action would result in *less-than-significant impacts* or *no or negligible impact* on land use and zoning. The City believes this to be an inaccurate characterization, based in part on inappropriate identification of the ROI. The City strongly believes the Proposed Action would result in a significant adverse impact on surrounding land uses from construction activities; a significant adverse impact on land use and local planning objectives from the conversion of agricultural land to industrial land, the reversal of many local and state land use policies, and lack of conformance with the mission of BARC; and a significant adverse impact on local zoning.

1. **The Proposed Action would not be in keeping with the general character and mission of BARC.** BARC serves the area as a critical environmental and open space resource, a National Register-eligible historic resource, a major employer, and a location for anticipated growth in

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research and development activities. The project site is located in the 2,980-acre Central Farm, BARC's oldest and largest farm. Most of the buildings and landscape of the Central Farm were developed between 1911 and 1944. The Central Farm has approximately 12 clusters of buildings situated on approximately 336 acres along with pastures, wetlands, and forested areas used for animal husbandry, production crops, animal and plant research, and wildlife management. County and state policies and regulations strongly discourage development of BARC, as its unique mission of agricultural research allows for both economic benefits and environmental preservation.

2. **The Proposed Action would not conform to R-O-S purpose or uses.** The DEIS accurately states that development on federal sites is not subject to local zoning; however, the proposed BEP facility would clearly not conform with the purpose of the R-O-S zone. The DEIS fails to provide a complete discussion of the Proposed Action in terms of the site's R-O-S zoning and intended purpose. It frequently refers to the existing zone as "Residential" (the broader category under which the R-O-S zone is situated) which does not clearly reflect the purpose and uses of the R-O-S zone.
3. **The Proposed Action would undermine established planning policies.** Many policies at the County and State level prioritize the preservation of prime agricultural land and the redevelopment of existing sites. The project site is located within the County's Priority Preservation Area (PPA), Growth Tier IV³, the *Plan Prince George's 2035 Rural* and Agricultural Policy Area, and the M-NCPPC Subregion 1 Master Plan Rural Tier⁴. Additionally, the Land Use Article § 25-211 of the Maryland Annotated Code stipulates, "If the United States Department of Agriculture sells any portion of the property known as the Beltsville Agricultural Research Center, the district council shall place and permanently maintain the land in a zoning classification of agricultural open space immediately after the transfer of the land to the buyer."
4. **The Proposed Action would establish a precedent for future actions with significant effects.** The DEIS does acknowledge that BARC is included in the County's PPA and the NCPC's regional parks and open space network, and conversion of this site to industrial land use would conflict with these policies; however, it fails to recognize the significance of the precedent that the Proposed Action would set in reversing these policies. Additionally, the City is concerned that Proposed Action would justify future actions on BARC that are inconsistent with BARC's mission. It is possible that development such as this will lead to further encroachment of incompatible uses onto BARC, such as the MAGLEV train maintenance yard. NEPA regulations require that the significance of proposed actions be based on both context and intensity, and one of the considerations in evaluating intensity is "The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration." The DEIS fails to take this into consideration.
5. **The DEIS mischaracterizes the ROI.** The analysis characterizes the ROI as an "established mixed-use community" and states that construction of the Proposed Action would be typical for the area, as "similar construction activities to the Proposed Action have occurred within the ROI

³ Growth Tier IV is the designation intended for the least intense uses under the Maryland Sustainable Growth and Agricultural Preservation Act of 2012.

⁴ The vision for the Rural Tier is the protection of large amounts of land for wooded wildlife habitat, recreation and agricultural pursuits, and preservation of the rural character and vistas that now exist.

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throughout the past several decades.” DEIS, 3-7. It proves difficult to determine what “similar construction activities” the DEIS is referencing. Based on a review of aerials, to find any non-residential development within the past 20 years in the identified ROI, one must look half a mile away from the project site on the west side of Edmonston Road. A more sensitive construction of the ROI would eliminate areas west of Edmonston Road from this analysis, thereby eliminating most if not all of the industrial and commercial uses as well.

6. **Additional documents should be provided.** To enable a more comprehensive understanding of land use planning at BARC, Treasury and USDA should make available the 1979 *Beltsville Agricultural Research Center Master Plan* and all updates, including the *1996 Master Plan Update Master Plan Report*, which is included in the DEIS reference list. Additionally, depending on the year in which this plan was last updated, BARC could consider updating the plan.

While the No Build Alternative is preferable, if the Preferred Alternative is pursued, the project should restore and/or enhance the current environmental features on the proposed site and/or mitigate CPF construction and operation through the acquisition and preservation of a comparably sized property in areas of the County currently slated for development. Additionally, the entire site should be buffered with vegetation in accordance with requirements of the Prince George’s County Landscape Manual, to ease transition between the existing residential and agricultural uses and the incompatible industrial use and to ensure the maintenance of a cohesive landscape to the maximum extent possible.

VIII. Historic Buildings and Structures

The DEIS evaluates impact to both physical effects (impacts to architectural resources within the project site itself, where building and structures could be physically impacted) and visual effects (impacts to the viewshed in which the project site is located). The City offers the following comment on the DEIS’s evaluation of historic buildings and structures:

1. **The City believes the Proposed Action would have a *significant adverse effect* on the ROI for physical effects to architectural history.** Under the Proposed Action, 23 buildings and structures that contribute to the BARC Historic District would be demolished. As the DEIS notes, the Proposed Action would result in “diminished integrity of the BARC Historic District’s design, setting, materials, workmanship, and feeling.” Despite this, the DEIS claims that the Proposed Action, including EMPs, RCMs, and BMPs, would have a *less-than-significant adverse impact* on the architectural history ROI for physical effects. The historic structures onsite are non-renewable. The significant adverse effect of the Build Alternative on the BARC Historic District *and* the individual contributing resources must be acknowledged.
2. **ROI for physical effects to architectural history must clearly include individual contributing resources to allow for an accurate assessment of impact to resources.** The City notes an inconsistency in the definition of the ROI for physical effects to architectural history and the impact assessment. The DEIS defines this ROI as “the Project Site (i.e., where buildings and structures could be physically affected)”, but later states that there is only “one architectural resource (i.e., the BARC Historic District) in the architectural history APE [ROI] for physical effects.” The ROI for physical effects to historic resources must include all historic buildings and

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structures onsite, and the impact on these resources (i.e., their demolition) must be clearly addressed in the impact assessment.

- 3. Discrepancy between DEIS significance assessment and documented significance and integrity of structures.** In terms of physical effects, the DEIS states that the No Build Alternative would result in a *significant adverse impact* on the BARC Historic District in the identified ROI “due to neglect and deterioration”. This assessment is especially concerning, considering the DEIS claims that the Build Alternative would result in a *less-than-significant adverse impact* on the BARC Historic District. This assessment that the No Build Alternative would have a greater impact than the Build Alternative lacks justification, and is inconsistent with evidence provided. While the majority of the historic buildings and structures onsite are vacant, the significance of these buildings and structures within BARC under NRHP Criteria A and C is well-documented in Maryland Inventory of Historic Places (MIHP) Determination of Eligibility (DOE) forms. Many of the structures are identified as retaining integrity, and a fair portion are identified as being in good condition. Additionally, the No Build alternative does not preclude future opportunities to address the current condition of historic buildings and structures. The DEIS would benefit from further discussion and a reconsideration of this assessment.
- 4. Significance of impact to visual effects for No Action alternative must be clarified.** Although an assessment of visual effects for the No Action Alternative does not appear to be provided, the City recommends that the continuance of the cohesive landscape and unobstructed vista and viewscape – despite the potential for deferred maintenance of vacant historic buildings within the ROI – would result in a *beneficial impact* on the ROI.
- 5. M-NCPPC concerns must be addressed.** During the DEIS public webinar held on December 2, 2020, M-NCPPC expressed concerns regarding impacts to the view from Walnut Grange, a Prince George’s County Historic Site. These concerns should be addressed in the DEIS.

The City concurs with the DEIS’s assessment that the Preferred Alternative would have a *significant adverse impact* on the visual environment: “By introducing the proposed CPF into the previously cohesive landscape, the Preferred Alternative would also obstruct vistas and viewscales from on-BARC areas outside the Project Site, primarily from the west and southwest, including from the 16 off-site (but on-BARC) contributing resources located within the architectural history APE for visual effects.” The cohesive landscape is part of the justification for the BARC Historic District’s eligibility for listing in the NRHP. As stated in the 1997/98 MHT Internal NR-Eligibility Review Form for BARC, “Because the mission of the BARC facility has remained constant over the years, the landscape also reflects a high level of integrity.” Introduction of the replacement CPF into this cohesive landscape would have a significant adverse impact. The Preferred Alternative should not be implemented.

IX. Visual Resources

The City offers the following comments/concerns about the impact analysis performed for visual resources.

- 1. Analysis does not include any area in the City of Greenbelt.** Because the northern edge of historic Greenbelt is located on a rise overlooking BARC, it is possible that the Proposed Action would have an impact on the City of Greenbelt (either the daytime or the nighttime view), specifically to those residences along Ridge Road.

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2. **DEIS does not identify full extent of building envelope.** The impact on viewshed is determined in part by the CPF main structure’s proposed setback from roadways, property boundaries, etc., but the building shown in renderings is understood to be conceptual and therefore subject to change. The full extent of the building envelope for the facility should be disclosed in the DEIS.
3. **Visual impacts to Odell Road residences.** The DEIS acknowledges that the Proposed Action will impact the residences along Odell Road. During construction (2021-2025), these residences may have unobstructed views of construction activities, and once construction activities have abated, “introduction of the proposed CPF would obstruct the historically and aesthetically valued vista/viewscape from the residences (i.e., the BARC Historic District viewscape), thereby permanently altering the character of the views from those homes.” As such, particular attention should be given to the owners and residents (owners and/or renters) of these homes. Treasury should proactively engage property owners and residents of the 34 homes along Odell Road in determining measures to be incorporated in the Proposed Action as EPMs. To mitigate the impacts of construction of adjacent residences along Odell Road, an additional EPM could be added: “Enhance landscape buffers within Forest Conservation Easements as the first step in the Sequence of Construction, to ensure maximum screening of construction activities from residential properties and roadways.”
4. **Impacts to other residences not considered.** The DEIS does not address possible impacts to additional residences that appear to be located within the ROI for visual impacts. The ROI appears to include residential dwellings at the eastern extend of Brewer Road, Cordwall Drive and Cordwall Court, and Cochran Road (Figure 3.9-2); however, these are bounded by a dashed line as opposed to a solid line. The meaning of the dashed line is not clarified within the DEIS, and impacts to these residences have not been accounted for in these analyses. The dashed line also appears at the ROI’s western boundary along Edmonston Road. The meaning of the dashed line and reason for excluding these residences from analysis should be clarified. If further evaluation indicates these residences will be impacted, Treasury should proactively involve the owners and residents be included in determination of EPMs.
5. **Security fencing not adequately addressed.** One of the mitigation measures proposed for impacts to Visual Resources is to “Ensure the permanent security fencing around the perimeter of the proposed CPF blends with the natural surroundings to the extent possible and does not present an obtrusive, visually distracting, discordant visual impact with the ROI [Region of Influence]. Use fencing that resembles residential fencing and does not appear threatening to adjacent viewers.” While the City agrees that impacts resulting from security fencing should be mitigated, the DEIS does not provide information on ISC fencing requirements and Treasury’s proposed fencing, and it fails to evaluate the visual impacts of security fencing. Requirements for fencing (height, materials, security features, etc.) should be outlined and included in the evaluation of visual impact. Security fencing should be shown in renderings provided in the Visual Resources Technical Memo. The “extent possible” to which fencing will be able to blend in with the natural surroundings should be identified and accounted for. At a minimum, the proposed mitigation should be revised to include “Consult with adjacent property owners along Odell Road to ensure fencing does not appear threatening to adjacent viewers” and included in the DEIS as an EPM.
6. **Landscape, forest conservation, and vegetative buffering not included.** To minimize visual impacts, the Proposed Action incorporates retention and enhancement of existing landscape buffers (i.e., topography and vegetation) around the periphery of Treasury’s proposed parcel “to

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obscure it from adjacent areas and maintain visual resources for off-site locations”; however, the DEIS does not include a landscape plan, a forest conservation plan, or any specific information pertaining to enhanced/additional vegetative buffering. Two forest conservation easements (FCE) exist⁵ along the northern portion of the site, but the LOD shown in the DEIS appears to disturb the FCE to the northeast. Forested areas to the east, which were included in the forest stand delineation and appear to have been previously included in the project area, may be subject to retention and preservation under the Maryland Forest Conservation Act if included in the site; however, they are no longer shown as part of the project site. No vegetative buffering appears to be proposed along the western and southern site boundaries.

7. **Prince George’s County Master Plan of Transportation and Landscape Manual not included.** Conformance to the Prince George’s County Master Plan of Transportation, and to the Prince George’s County Landscape Manual should be incorporated into the Proposed Action as an EPMs, RCMs, or BMP. To minimize visual impacts, landscape buffers should be installed on all sides of the facility, and should include a mixture of native canopy and understory trees and herbaceous cover to ensure full screening. A variety of fast-growing and slow-growing species could be used to facilitate short- and long-term screening.

X. Beaver Dam Creek and Surface Waters

One of the primary concerns raised by the City of Greenbelt during the public scoping period was “Wastewater discharge treatment and impact on Beaver Dam Creek”. Beaver Dam Creek is considered an area of critical concern as a Tier II stream. The DEIS notes that operation of the proposed CPF would produce approximately 120,000 gallons per day of wastewater, all of which would be conveyed to BARC’s East Waste Water Treatment Plant (WWTP, located 0.3 miles south of the Project Site), treated to “applicable effluent standards”, and discharged to nearby surface waters. The following issues that must be addressed in the DEIS include:

1. **The DEIS fails to provide sufficient information regarding existing WWTP facility and permit.** The DEIS does not include specifics regarding current and planned future wastewater treatment quantity and quality at BARC and the East WWTP specifically (sans CPF). The DEIS does not list BARC’s current permitted capacity. It does not provide information regarding the efficiency of the existing treatment plant and any upgrades that may be necessary to address increases in wastewater and introduction of a new industry which may generate wastewater of a different composition. The DEIS does not show the location of discharge on plans.
2. **The DEIS does not provide a comprehensive understanding of CPF wastewater composition, characteristics, and effluent standards.** The Hazardous and Toxic Materials and Waste portion of the DEIS states that “the largest amount of hazardous waste would be generated from wastewater treatment from nickel and chrome plating operations (i.e., 22,500 pounds [lbs] per year”, but the DEIS does not provide a complete breakdown of CPF wastewater composition (including anticipated material/pollutant types and amounts/proportions) and the specific effluent standards to which the water will be treated. The DEIS states that hazardous waste generated on-site would either be treated off-site prior to disposal or incinerated off-site in accordance with

⁵ Easements were established in 2014 as a mitigation measure for the Intercounty Connector Project. Construction and Operation of a Currency Production Facility at the Beltsville Agricultural Research Center

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federal and state requirements; however, the DEIS does not indicate the effectiveness of wastewater treatment. The DEIS does not provide specifics regarding types and amounts of organic and inorganic pollutants that the treated water may retain when discharged into receiving waters of Beaver Dam Creek. It is unclear whether the wastewater would retain amounts of nickel, chrome, lead, arsenic, waste solvent, corrosive waste, etc. The DEIS also does not provide the anticipated temperature or velocity of discharged waters.

3. **Insufficient evidence and lack of clarity regarding determination of *less-than-significant adverse impacts*.** The DEIS states that CPF operations would result in “*less-than-significant adverse impacts* on the flow of surface waters in the ROI, including Beaverdam Creek.” It is unclear if this statement is intended to apply only to the *flow* of surface waters, or whether it is intended to apply to the hydrologic function and quality of surface waters as well. No information is provided regarding impacts to hydrologic function. The DEIS presents insufficient information to substantiate a claim that the CPF operations would have a less-than-significant adverse impact on Beaver Dam Creek’s hydrologic function, flow, or quality.
4. **Proposed impacts to onsite surface waters draining to Beaver Dam Creek.** The Proposed Action would divert approximately 117 linear feet of intermittent stream; fill and not replace approximately 109 linear feet of a second on-site intermittent stream; and impact a portion of Wetland 4 to allow for installation of security fencing. Both of these streams drain to Beaver Dam Creek. Wetland 4 is the “largest and highest quality of [the wetlands onsite, and] is largely groundwater-fed and derived from an intermittent channel” and feeds to the intermittent stream to be diverted. The City is concerned that impacts to these streams may have down-stream effects on Beaver Dam Creek which the DEIS fails to account for.
5. **Additional EPMs should be considered.** While the No Action alternative is preferable, if the CPF proceeds to final design and engineering, as an additional EMP, Treasury should implement use of gray water systems onsite to minimize wastewater. Impact to these streams and wetland should be avoided.

XI. Stormwater

The DEIS asserts that *no or negligible adverse impacts* to stormwater are expected; however, evidence is not provided to support this claim. Without information to support this claim, it is difficult to imagine that the 29.4 acres of impervious surfaces that would be added by the Project would not have significant adverse impacts. The City offers the following comments:

1. **Regulatory requirements and stormwater proposal not included in DEIS.** The DEIS states that the Project would comply with applicable state and federal stormwater regulations (specifically “Section 438 of the EISA and EO 13508”), but it does not clarify specific regulatory requirements or provide information regarding Treasury’s proposed compliance measures. The Water Resources Technical Memorandum states, “To comply with Section 438 of the EISA, federal agencies are required to conduct an analysis of pre-development hydrology to establish a baseline condition and set design objectives for stormwater management that maintain predevelopment conditions with regard to temperature, rate, volume, and duration of flow associated with federal proposed actions.” This information must be included in the DEIS.

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2. **Compliance with regulatory requirements may be insufficient to determine significance of impact. Additional information must be provided.** The City notes that state and federal regulations do not require total quantity or quality treatment of all nutrients, but only keynote nutrients. It is conceivable that the Project could meet all federal and state requirements and still have an adverse impact. During the public scoping period, the US EPA recommended that the EIS should “outline specific measures to protect surface waters” and include in the analysis a discussion of “how the proposed stormwater management facilities protect water quality by addressing pollutants such as runoff from parking lots (including thermal impacts, heavy metals and petroleum/oils) and landscape pollutants (such as fertilizers, pesticides, bacteria, and sediment) from entering surface waters.” The DEIS does not address these concerns.
3. **Treasury plans to defer determination of stormwater requirements.** It is unclear whether Treasury has performed site-specific analysis of possible effects of increased stormwater. The DEIS states that Treasury plans to determine stormwater requirements through the proposed CPF design process. The City believes that determinations regarding stormwater cannot be deferred. To have a comprehensive understanding of the Project’s potential effects, stormwater requirements and impacts must be addressed with the DEIS, including but not limited to impacts to hydrology in terms of volume, quality, and temperature, and a complete break-out of current and anticipated nutrient and sediment loading must be provided. All calculations should be provided for the site as a whole, as well as by drainage area and watershed.
4. **Unclear if deficiencies in existing stormwater infrastructure will be addressed.** The Utilities Technical Memorandum notes that existing stormwater management capacity is “unknown; however, existing drainage is obsolete with significant inflow and infiltration issues”. The Water Resources Technical Memorandum notes that 51% of the site drains to existing stormwater management infrastructure, which drains to Indian Creek. The DEIS must provide information regarding whether the Proposed Action would address issues with existing stormwater management infrastructure. If so, specific actions must be outlined in the DEIS.
5. **Impacts of transportation mitigation are not addressed.** Per the TIS, proposed transportation mitigation will add over 340,000 square feet (i.e., approximately 8 acres) of new impervious surface for roadways. This concern is further outlined in the “Connected Actions” section of this memo.

XII. Draft Finding of No Practicable Alternative (FONPA) and Wetlands

Under Executive Order (EO) 11990, *Protection of Wetlands*, Treasury “shall avoid undertaking or providing assistance for new construction located in wetlands unless the head of the agency finds: (1) that there is no practicable alternative to such construction; and (2) that the proposed action includes all practicable measures to minimize harm to wetlands which may result from such use.”

Under EO 11990, Treasury must find that there is no practicable alternative to development within wetlands and take all practicable measures to minimize harm to or within wetlands. The Draft FONPA includes such a finding and outlines the steps Treasury will take to avoid or minimize impact to wetlands.

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The City offers the following comments pertaining to the FONPA:

1. **Treasury's FONPA for the Proposed Action does not appear warranted**, given the information in the "Alternatives Considered" portion of the City analysis, including the apparent existence of reasonable alternative sites and the extensive opportunities for redesign at Treasury's Preferred Alternative site.
2. **The mitigation outlined in the FONPA does not appear to include "all practicable measures to minimize harm"**, as required by EO 11990. The DEIS and the FONPA state Treasury's intent to apply for an exemption from mitigation requirements for wetlands under Maryland's Nontidal Wetlands Protection Program. The FONPA states that "any mitigation will be implemented as directed"; however, it is anticipated that MDE may not require mitigation, as the impact is less than 1 acre. While this may meet MDE's regulatory requirements, the implementation of mitigation only as directed – and not as a proactive harm-reduction measure – does not appear to meet the standards of EO 11990. Mitigation at a minimum 1:1 rate for emergent wetlands must be provided. The use of wetland restoration should always be the first compensatory mitigation option considered.
3. **The head of Treasury must make relevant findings.** The City notes that EO 11990 appears to require the head of the federal agency to make relevant finding; however, the FONPA includes a signature line for "Charles C. Davis, P.E. / Program Manager / Bureau of Engraving and Printing [emphasis added]".

Additional comments pertaining to wetlands generally include:

1. **Inadequate significance thresholds identified in the DEIS.** The DEIS considers a significant adverse impact to wetlands to be one that would "Fill or substantially alter more than 1 percent (i.e., 8.15 acres) of the total wetland acreage at BARC." The DEIS provides no clear justification or rationale for this significance threshold. The significance threshold must be reconsidered in terms of the stringent guidance of EO 11990, which instructs federal agencies undertaking new construction to avoid *any* impact to wetlands (regardless of size) unless no alternative exists. The FONPA recognizes that development activities impact wetlands "via the loss or degradation of their natural functional benefits such as water storage, infiltration, and filtration. These impacts extend to the intrinsic value of these resources or the benefits associated with their use, such as wildlife habitat, recreation, and aesthetic enjoyment. Wetland functions and values are also susceptible to changes in the volume, rate, and quality of stormwater discharge, particularly as influenced by the amount of impervious surface within a watershed." The DEIS does not appear to account for the significance of these impacts. The assessment that potential wetlands impacts from construction of the Proposed Action would be considered *less-than-significant impacts* must also be revised to *significant adverse impacts*.
2. **Information regarding wetland impacts are inconsistent.** The FONPA states, "The Proposed Action would permanently affect approximately 0.94 acres of wetlands and up to 2 additional acres of wetlands may be subject to temporary, construction-related effects." The DEIS does not mention an additional two acres of temporary disturbance to wetlands. The extent and duration of impact to wetlands must be clarified in the DEIS.
3. **Information pertaining to compliance with Section 404 of the Clean Water Act should be provided.** The DEIS states that the Project will comply with Section 404 of the Clean Water Act (CWA). The DEIS should clarify how the Project will comply with the CWA, which permits are

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required for the Project, whether additional public engagement is required, and any mitigation that Treasury will provide. The CWA permit must address all discharges associated with this project. All operation discharges resulting from this Project must be covered under one permit. If this project will result in the implementation of additional projects (e.g., the widening of Kenilworth Avenue to accommodate increased traffic), that must be made clear and any associated impacts should be addressed in the DEIS and covered under the same permit as the project.

XIII. Forest Retention

The Proposed Action would result in the permanent removal of vegetative communities on the Project Site, including 3.6 acres of forest, 58.4 acres of open meadow with mature trees, 0.9 acres of emergent wetlands, and 20.7 acres of agricultural land. Up to 125 of the 149 specimen trees on the project site (84%) would be removed. Despite this, the DEIS claims that “tree removal [...] would be *less than significant* on the project site and *negligible* in the context of the overall ROI.” This claim is not sufficiently justified. The proposal will adversely impact Forest Stand 2, which is identified as a high priority stand for retention due to its mature successional stage, specimen trees, and lack of invasive species. The proposal will result in the removal of the majority of specimen trees onsite, adversely impact mature vegetation. The proposal to mitigate tree removal through the Forest Conservation Act (FCA) has not been made available; it is possible that requirements are proposed to be met through off-site planting outside of the watershed or through a fee-in-lieu, neither of which would serve to minimize the impacts of tree removal onsite. The only forest clearly shown to be retained onsite is already encumbered in easement.

In December 2019, USACE prepared a forest stand delineation (FSD) to identify, delineate, and characterize forest stands and specimen trees. 188 specimen trees were identified and characterized, and four forest stands were identified and prioritized based on observed characteristics in accordance with guidance from the *Maryland State Forest Conservation Technical Manual*. Since the time of the FSD, the project site appears to have been reconfigured. As a result, the majority of the four forest stands and many of the specimen trees are located in areas that are now being identified as outside of the project site in areas not proposed to be disturbed by the Proposed Action.

It is concerning that the limit of disturbance (LOD) would impact the existing FCE in the northeast corner of the site (Figure 3.8-1). The easement documents should be provided to clarify applicable protections and responsibilities. The conflict between the LOD and the FCE should be resolved. Treasury proposes to “retain and enhance existing landscape buffers” (Table 2.2.-1). Because the existing conservation easements were established and credited as mitigation for an earlier project, their continued retention (and/or any reconfiguration, if applicable) should not be considered as mitigation toward this project, but rather as a legal obligation.

The DEIS claims “[t]he removal of specimen trees and forested areas during construction [...] would be offset by Treasury’s compliance with the FCA [Maryland Forest Conservation Act]”; however, it is unclear what measures Treasury plans to take to comply with the FCA. To substantiate these claims, the Forest Conservation Plan and Planting Plan that Treasury plans to develop should be prepared in

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accordance with the *Maryland State Forest Conservation Technical Manual* (1997) and made available with the DEIS. All applicable calculations should be made available, including net tract area (excluding forest already under easement), break-even, afforestation, and conservation thresholds. To maintain consistency with the current land use and zoning of the project site and BARC, these thresholds should be based on those required for an agricultural use, as opposed to an industrial use (which are less stringent). The plan should result in preservation and on-site planting to the maximum extent practicable. Any off-site planting should occur in the same watershed. Fee-in-lieu of planting should not be considered.

Additionally, the figures included in the FSD appendices should be revised as follows:

1. FSD maps should include all elements required by *Maryland State Forest Conservation Technical Manual*;
2. Sample points should be clearly and accurately located on the FSD map in Appendix B, to enable cross-referencing with data sheets in Appendix A; and
3. Specimen trees should be clearly and accurately located on the FSD map in Appendix C.

This will enable a more comprehensive understanding of the existing environmental resources onsite, including wetlands, streams, and steep slopes, and suggest possibilities for modification of the LOD to avoid impact to sensitive environmental features.

Further EPMs should be considered by Treasury to ensure maximum protection of priority forest and specimen trees, as follows:

- Modify the LOD associated with proposed entrance road upgrades and the proposed vehicle entry control facility to avoid diverting approximately 117 linear feet of the unnamed intermittent stream on-site, and to avoid removal of the maximum number of specimen trees in ‘Very Good’ and ‘Good’ condition.
- Because the FSD has revealed the high priority of forest stands 1, 2, and 4 (each of which is located substantially off-site and not proposed to be directly impacted by the Proposed Action), Treasury should work with BARC to protect these forest stands in their entirety by encumbering them with permanent protective easements. This would not only protect valuable forest land, but ensure a functional buffer to the east of the site into perpetuity. Additionally, as forest stands 1 and 4 have a moderate to high occurrence of invasive species, invasive management plans should be developed for these stands.

XIV. Lighting

The CPF will operate 24 hour per day, five days per week. The facility will also operate on the weekend, as needed. During the scoping period, the City of Greenbelt raised concerns regarding “The 24-hour operation of the BEP facility and associated lighting (i.e., impact on the environment/wildlife) [...]”. The DEIS states that noise and light generated at the facility would attenuate to ambient levels at approximately 800 feet. The DEIS states that Treasury’s Preferred Alternative would have potentially significant adverse impacts on nighttime lighting levels in and around the project site, and specifically for up to 34 residences along Odell Rd. The City is concerned that the CPF would also be visible at night

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from within City limits particularly along Ridge Road. During the public scoping period, a concern was raised that nighttime lighting may impact the Greenbelt City Observatory. These concerns are not addressed in the DEIS. It would be beneficial for Treasury to provide a photometric study of the site in the DEIS to address concerns regarding lighting. Compliance with the Prince George's County Code of Ordinances regulations for parking lot lighting and associated off-site impacts should be incorporated into the Proposed Action as an EPM.

While the DEIS recognizes the significant adverse impact of nighttime lighting on humans living nearby, it fails to recognize its impact on wildlife. The DEIS claims that "measures to reduce operational noise and light impacts, including using lighting fixtures that direct light to on-site areas" would minimize impacts to a *less-than-significant adverse impacts* to wildlife. This conclusion lacks justification. It is unclear why lighting would adversely affect humans but not animals, particularly those that are nocturnal. The potential impact of increased lighting on migratory birds (many of whom migrate at night and are impacted by light pollution which hides their navigational aids, the moon and stars⁶) is also not addressed. As noted earlier in the Biological Resources portion of this memo, the significance threshold used to determine the intensity of impacts to biological resources is ill-suited to accurately assess impacts of the CPF's 24-hour operations and nighttime lighting on wildlife and wildlife habitat in and near the project site. The DEIS states that "Over time, many local wildlife species would adapt to these new conditions or relocate to other areas in the ROI," indicating that the Proposed Action would have, at a minimum, a short-term adverse impact that is not being accounted for. The City's previously-raised concerns regarding lighting and nighttime operations have not been fully addressed.

The Biological Resources portion of the DEIS includes the following as an EMP, RCM, and BMP: "Incorporate noise and light abatement or shielding features into the design of the proposed CPF as identified in other resource areas (see the Noise Technical Memorandum and Visual Resources Technical Memorandum, respectively)." Therefore, it is anticipated that the following "mitigation measures" listed in the Visual Resources portion of the DEIS (the only light abatement features listed therein) will be included in the Proposed Action:

1. "Develop an exterior lighting plan for the proposed CPF that minimizes off-site light pollution, such as by using directional lighting that focuses light on areas within the project site, while still meeting site security requirements.
2. Use a spectrum of light generally perceived as more natural, such as light-emitting diode (i.e., LED), metal halide, or halogen elements.
3. Avoid high-intensity discharge (i.e., HID) or fluorescent lights (except compact fluorescent bulbs 226 that screw into standard sockets) on the exterior of buildings.

For consistency, these measures must be included as EMPs in the Visual Resources section as well. An additional EPM that should be included with the proposal is the use of full cut-offs for all exterior lighting.

⁶ Florida Atlantic University. n.d. Light Pollution Kills Birds in the Environment. Available at: <http://physics.fau.edu/observatory/lightpol-Birds.html>. Accessed December 4, 2020.

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XV. Wildlife

The DEIS claims that the Proposed Action would have *no significant adverse impacts* to biological resources (this includes vegetation, wildlife, and migratory birds). Potential impacts on biological resources from light encroachment (addressed earlier in this memo) and noise were also analyzed. The City has concerns about the assessment of impact to wildlife, including migratory birds, as offers the following comments:

1. **Inadequate significance thresholds identified in the DEIS.** The DEIS recognizes that the Proposed Action would result in the destruction of 83.6 acres of existing, vegetated wildlife habitat and the displacement and/or killing of wildlife currently living onsite; however, the DEIS claims that the Proposed Action would have a *less-than-significant adverse impact* on wildlife, as it “would not substantially reduce regionally or locally important habitat or substantially diminish a regionally or locally important plant or animal species.” This may be a result of the insufficient significance threshold used in the Biological Resources portion of the DEIS, which fails to consider impacts to species that are not “regionally or locally important”, or “federal- or state-listed species”. To provide an accurate assessment, the definition must be expanded to include potential impacts to biological resources related to impacts to vegetation, aquatic wildlife species, terrestrial wildlife species, and special status species.
2. **Failure to address impacts to aquatic wildlife and plant species onsite.** The proposal will directly impact 226 linear feet of stream (117 to be diverted; 109 to be filled and not replaced), and approximately one acre of emergent wetlands. Impacts to aquatic species due to this action must be addressed in the DEIS.
3. **Failure to address impacts to aquatic and terrestrial species offsite.** The CPF will discharge 120,000 gallons of wastewater each day into Beaver Dam Creek and will increase onsite impervious by 29.4 acres (31.2%). The analysis does not include potential impacts to wildlife and plant species in wetlands, waterways, and floodplains due to possible impacts including changes in hydrology; higher water temperatures; increased sedimentation, nutrient loading, and turbidity; increased runoff of metals (e.g., arsenic, chromium, and lead) which naturally occur at high concentrations in the soil and sediment of the project site; introduction of harmful chemicals⁷; etc. As with other analyses, impacts due to implementation of transportation mitigation are not addressed.
4. **Threatened species identified in the Environmental Condition of the Property (ECP) assessment not addressed in the DEIS.** Lists of endangered species that may be present in Prince George’s County were reviewed as part of the ECP assessment provided with the DEIS. Two threatened species were identified: The Northern long-eared bat (*Myotis septentrionalis*, also “NLEB”) and Sensitive joint-vetch (*Aeschynomene virginica*). A bat study performed in December 2019 did not identify any NLEB onsite. Information submitted with the DEIS indicates that the USFWS does not have further requirements pertaining to NLEB; however, the DEIS includes no information or analysis of Sensitive joint-vetch.
5. **DEIS does not appear to utilize all possible resources to identify species onsite.** Comments from the December 2, 2020, public DEIS webinar indicate that bird surveys have been performed by BARC staff and local volunteers. These could prove a useful resource to provide a baseline for

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analysis. Treasury should contact BARC staff running the bird surveys for assistance in further analysis. Revisions to impact determinations may be necessary.

6. **Possible impacts to migratory birds are not addressed sufficiently.** The DEIS notes that USFWS identifies 12 migratory birds with potential to occur on the project site, eight of which have specifically been reported within the designated ROI for Biological Resources. These birds are also considered Birds of Conservation Concern by the USFWS. The DEIS makes claims such as “most [migratory] birds would likely avoid the Project Site or relocate to nearby habitat areas on BARC, in the ROI, or regionally”, but provides little evidence to support such claims. Adverse impacts to migratory bird populations must be fully incorporated into the DEIS, including potential for bird migration to be impacted by additional light pollution and for migratory bird deaths to increase due to window strikes. While the No Action Alternative is preferable, if the BARC site is chosen, Treasury must commit to two revised EPMs:
 - a. “Limit or avoid all construction (~~e.g., tree removal or noise intensive activities~~) within the nesting season of migratory birds observed on the Project Site (i.e., May 1 to September 10) ~~to the extent possible.~~”
 - b. “~~Using the LEED framework, evaluate the need for~~ Implement design measures to reduce the likelihood of bird mortality from window strikes, including ~~such as~~ patterns on glass windows and use of non-reflective windows.”
7. **Treatment of the Northern Long-Eared Bat (NLEB).** The DEIS states that the Proposed Action *may affect* the NLEB (a federally-threatened species). This level of significance is not identified in the associated Technical Memorandum. It appears that because the USFWS concurred with Treasury’s determination that “any take that may occur under the Proposed Action would not be prohibited”, the possible impact to NLEB has been discounted. This logic is flawed: The fact that an action is legally permissible does not mean that it will have no adverse impact. The City finds that an impact assessment of *potentially significant adverse impact* most appropriate. The determination of significance associated with possible impacts to NLEB must be reconsidered.

XVI. Traffic and Transportation

During the public scoping period, the City of Greenbelt raised traffic- and transportation-related concerns including:

- 1) Potential road closures within the BARC campus, and impacts on motorists, pedestrians and cyclists.
- 2) Traffic impacts/safety including heavy truck traffic.
- 3) Traffic patterns and impacts on local roadways including Edmonston Road, Sunnyside Avenue and Powder Mill Road.

The City offers the following comments:

- 1) **DEIS does not clearly state which transportation mitigation measures would be implemented.**
- 2) **Wetlands near possible transportation mitigation do not appear to have been field-delineated.**

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- 3) **Potential for increased traffic on Greenbelt’s local roadways.** The City is concerned that any unmitigated short- and long-term adverse traffic impacts will result in increased (cut through) traffic on Greenbelt’s local roadways and potential adverse impact to residential neighborhoods. This concern must be addressed in the DEIS.
- 4) **DEIS fails to address safety concerns.** Although the associated Technical Memorandum recognizes traffic-related safety concerns as one of the primary concerns raised by commenters during the public scoping period, the DEIS provides no analysis of or information regarding this concern. The only mention of traffic-related or pedestrian safety is in an optional mitigation measure recommending that Treasury “Consult with WMATA regarding the opportunity to adjust Metrobus routes such that they serve the proposed CPF more effectively (e.g., instating a bus stop along the proposed CPF’s driveway), thereby reducing traffic in the local ROI by making public transit more accessible and functional for employees, and improving pedestrian safety by reducing the need for employees to walk along Powder Mill Road to access a bus stop”. Safety concerns must be addressed and appropriate EPMs must be adopted.
- 5) **Mitigation outlined in the TIS and referenced in the DEIS includes significant widening of MD-201 (Edmonston Road).** Recommendations include:
 - a. Adding a second approach through lane and receiving lane in both directions at the intersection of Edmonston Road/Sunnyside Avenue
 - b. Adding a second eastbound Powder Mill Road through lane and adding additional turn lanes at the intersection of Edmonston Road/Powder Mill RoadThe City of Greenbelt is not in favor of any street widening, particularly on Edmonston Road. The City recommends that alternative means of mitigation be employed to fully address necessary mitigation.
- 6) **Intersection of Edmonston Road and Beaver Dam road not identified for possible mitigation in the DEIS.** The TIS recognizes that mitigation at this intersection is not required, but recommends it, based on the “potential gap acceptance issues for vehicles attempting southbound left turns from Edmonston Road onto eastbound Beaver Dam Road”; however, the DEIS does not identify this intersection as experiencing a *significant adverse impact* because it has a volume of less than 100 vehicles per hour. The City believes that mitigation for this intersection which does not include widening should be reconsidered, and impacts should be fully addressed.
- 7) **Anticipated short- and long-term road closures.** The DEIS states that all or part of Powder Mill Road would be temporarily closed to construct necessary modifications, and states that one-way alternating traffic would be used to the extent practical and roadwork would be coordinated with local authorities to maintain a less-than-significant impact. Construction would also result in the closure of the striped shoulder on Powder Mill Road between Edmonston Road and the Baltimore-Washington Parkway that provides space for cyclists. The DEIS states that these closures will have a *less-than-significant impact* on local traffic and the bicycle network. It does not appear that any other short- or long-term road closures would occur; however, the DEIS does not clearly state whether CPF operational requirements are anticipated result in additional permanent road closures. The DEIS should clearly indicate whether the road closure at the intersection of Odell Road and Poultry Road is intended to persist.
- 8) **Employee travel surveys did not capture baseline data.** The survey gathered information on employees’ expected travel modes to a possible CPF located at BARC; however, it does not

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appear to have gathered information on employees' current travel mode to the CPF in Washington, DC. Establishing this baseline would provide a better understanding of Proposed Action impacts and would benefit the TIS and the DEIS.

- 9) **Baseline transit ridership data is not provided.** The DEIS does not provide data regarding the number of employees and visitors currently and historically (i.e., pre-COVID-19) arriving and departing the existing CPF by transit. This information should be provided to facilitate a better understanding of impacts to transit ridership.
- 10) **A decrease in transit ridership should be considered a significant adverse impact.** The significance threshold outlined in the associated Technical Memorandum defines a *significant adverse effect* as one that would “Interrupt an existing public transit route over the long-term without a convenient replacement” or “Cause an abrupt, unplanned change in existing transit ridership levels that would require the transit authority to alter existing operations”. BARC is significantly less transit-accessible than the existing facility, and therefore an overall drop in transit ridership is possible. However, based on the defined significance threshold, the DEIS finds that the generation of new transit trips in one direction or another would create an *adverse* impact. The transit system should be viewed holistically, and any system-wide reduction in transit ridership resulting from the Proposed Action should be conceived of as a negative impact. This could be addressed through revisions both to the significance threshold and the ROI.
- 11) **Concerns regarding truck traffic are insufficiently addressed.** The Transportation Technical Memorandum states that Treasury assumes there would be 7,278 dump trucks over the construction period (approximately one-two years). During operation, Treasury anticipates that 82 trucks would arrive and depart the CPF each week, some during the evening and midnight shifts. The DEIS states that construction traffic and construction noise would have a *less-than-significant adverse impact* on the local area. The DEIS states that truck traffic during operation of the CPF would have a *less-than-significant adverse impact* on roadways with EMPs in place. The DEIS will incorporate a number of EPMs, RCMs, and BMPs to minimize the impact of trucks, including restricting truck arrival and departures and restricting truck traffic on residential roads; however, the City is concerned that trucks traffic during construction and operation would have a noticeable adverse effect. This should be recognized in the DEIS.
- 12) **Truck traffic to be routed along Edmonston Road.** One of the EPMs, RCMs, and BMPs to address traffic impacts is to require trucks to follow existing truck restrictions on various roadways. It further instructs, “Truck traffic should be routed along Powder Mill Road, Edmonston Road/Kenilworth Avenue, and the Capital Beltway to minimize its use of collector and local roads.” The City is concerned this may have an adverse impact on Edmonston Road.
- 13) **It is unclear if visitor traffic has been accounted for in the TIS.** The TIS recognizes that the CPF would include a visitor center, but it is unclear how many visitors are expected and whether the TIS accounts for visitor traffic to the site.
- 14) **Roadway impacts incurred during this Project should be reconstructed with all master-planned bicycle and pedestrian facilities.** Since Powder Mill Road is a future location for bike lanes, the City reiterates NCPC’s earlier suggestion that new bike lanes connecting the site to the existing bike lanes on Edmonston Road should be installed. This would encourage the use of bicycles to commute to the BEP facility.
- 15) **Depiction of proposed internal circulation would be useful for informational purposes.** This would include proposed location of loading zones.

XVII. Environmental Justice

Per Title IV of the 1964 Civil Rights Act and Executive Order 12898, "...each Federal agency shall make achieving Environmental Justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations". The DEIS identifies that an EJ community of concern is present within the ROI with respect to race, and that Treasury's Preferred Alternative and the "resultant adverse environmental impacts, especially those to air, noise, and traffic, *may disproportionately affect* EJ communities of concern". The DEIS does not recommend additional mitigation measures to address these impacts, but instead states that Treasury should implement the mitigation measures recommended in the Air Quality and Transportation and Traffic sections of the DEIS. However, while air quality-related EPMs, RCMs, and BMPs are included in the Proposed Action, no additional mitigation measures are proposed in the Air Quality section. Given the possible disproportionate impact on EJ communities, the DEIS should propose additional air quality, noise, and transportation mitigation measures to further reduce impact to EJ communities.

Additionally, to better understand impact to EJ communities, the DEIS should also consider the impact to BEP employees, some of whom are potentially members of EJ communities of concern elsewhere in the region. This would include those who are transit-reliant. The DEIS would benefit from a discussion of impacts to employees who will work in the CPF and also come from low-income households, 0-1 car households, minorities, and persons with disabilities. Opportunities to provide mitigation in the form of promoting and enhancing alternative modes of transportation, which may also serve to alleviate traffic and air quality issues proposed to impact EJ communities in the area surrounding the BARC site, should be more fully explored in the DEIS. This could include installation of the planned bicycle lanes on Powder Mill Road connecting to Edmonston Road, as well as bicycle lanes along the new entry road to the facility; sidewalks from the nearest bus stop to the facility; bicycle parking and storage lockers; and shower and locker facilities in the CPF.

XVIII. Need for Additional Field Investigations

The DEIS does not provide enough information to form a comprehensive understanding of the Proposed Action's impacts. The project site, which is to be transferred from the USDA to Treasury, is identified as a 104.2-acre parcel (as described above). Under the Proposed Action, an additional 18 acres adjacent to the project site would be directly impacted by development activities associated with road improvements and modifications. Many of the analyses included in the DEIS examine impacts associated with all of the above areas; however, in some instances, supporting investigations for the 18-acre area have not been made available. For example, neither the Forest Stand Delineation (FSD) nor the Wetland Delineation include these 18 acres adjacent to the project site. Background investigations for this portion of the site must be provided with the DEIS.

XIX. Connected Actions

40 C.F.R. § 1508.25 (2019) requires that the DEIS include “connected actions”. Actions are considered to be connected actions if they: 1) automatically trigger other actions which may require environmental impact statements; 2) cannot or will not proceed unless other actions are taken previously or simultaneously; 3) are interdependent parts of a larger action and depend on the larger action for their justification.

The DEIS does not evaluate the impact of connected actions at BEP’s existing facilities once currency production is transitioned to the proposed CPF. Additionally, potential costs associated with the existing facility do not appear to be reflected in the DEIS. The 2018 GAO report states, “The ability to sell or repurpose any part of the current D.C. facility could affect the total federal costs of BEP’s actions.”

The DEIS also does not evaluate the impact of connected actions associated with possible transportation mitigation at the intersections listed in the Traffic and Transportation section of this memo. It is anticipated that these measures would result in impacts to additional off-site areas, but they are not analyzed in the DEIS. It appears that decisions regarding specific mitigation to be implemented with the Proposed Action have not yet been agreed upon. The EPMs, RCMs, and BMPs do not include the specific mitigation required to address failing intersections. Instead, a generalized list of typical intersection design measures is included in the DEIS as “mitigation measures” that Treasury *should* design and implement for the intersections anticipated to experience *significant adverse impacts*.

The DEIS does not appear to include information regarding any on-site investigation of transportation mitigation areas’ existing conditions, nor does it provide an analysis of the proposed mitigation’s impact on resources. For example, wetlands depicted in TIS mitigation figures appear to be based on Fish and Wildlife Service National Wetlands Inventory (USFWS NWI) data, without the benefit of field-verification. Field work identifying all environmental features should be completed prior to, and made available with, the DEIS. Treasury should coordinate with the County to determine which mitigation measures would be implemented under the Proposed Action. If transportation mitigation will result in impact to wetlands, the impact should be considered under the same permit as other wetlands impacts.

It is also unclear if the existing BARC East will require upgrades to address increases in wastewater and introduction of a new industry which may generate wastewater of a different composition. If upgrades or modifications are required, this action should be addressed in the DEIS.

To ensure a comprehensive understanding of the Proposed Action’s impacts, impact analyses, supporting investigations, and cost estimates should consider and treat the project site, the 18 acres on which the new entry road and associated modifications to Powder Mill Road are proposed, all areas subject to proposed traffic mitigation measures, and existing BEP facilities, at a minimum.

XX. Cumulative Effects

The assessment of Cumulative Effects is insufficient. The Cumulative Effects Technical Memorandum includes a list of projects in and around BARC, but the analysis of cumulative effects included in the DEIS appears to have been conducted from the perspective of the proposed action. Per the Council on Environmental Quality's (CEQ) *Considering Cumulative Effects Under the National Environmental Policy Act*, which is listed as an applicable guidance and regulation document in the Technical Memorandum, "Cumulative effects need to be analyzed in terms of the specific resource, ecosystem, and human community being affected. [...] Analyzing cumulative effects requires focusing on the resource, ecosystem, and human community that may be affected and developing an adequate understanding of how the resources are susceptible to effects." The methodologies used in the cumulative effects analysis for determining cause-and-effect relationships and their magnitude should be made clear in the DEIS. Any methodology used in the analysis should employ, as described in the CEQ guidance, "broad thinking about the interactions among the activities and resources that affect environmental change".

Additional analysis should be performed and justification provided for assessments pertaining to the cumulative effects of the Proposed Action and other past, present, and reasonably foreseeable future actions, particularly in terms of impact on the BARC Historic District, land use on BARC and on the surrounding community, wetlands and waterways (with particular consideration of impact to Beaver Dam Creek, Indian Creek, and impact to wetlands which falls below mitigation thresholds), wildlife and wildlife habitat (both terrestrial and aquatic), transportation, and climate change (including consideration of possible reductions in transit use and other alternative modes of travel due to project implementation), and adequate mitigation or impact-reduction measures should be proposed to address cumulative impacts of the Project. The City is particularly concerned about the proposed MAGLEV Project, the I-270 and I-495 Managed Lanes project (which was omitted from the list included in the Technical Memorandum), and the possible widening of MD-201 and the Beltway. The City of Greenbelt would be impacted by each of these projects and the total impact to the historic, cultural, and environmental resources in and around the city should be analyzed in the Project's cumulative impact analysis.

XXI. Limits of Disturbance (LOD)

The limits of disturbance appear inaccurate and insufficient. The following issues must be addressed:

1. **The LOD associated with work at the project site is shown inconsistently throughout the DEIS** (e.g., Figures 3.6-1 and 3.7-3).
2. **The LOD does not appear to provide for utility work.** The project will include utilities installation and relocation, including relocation and reconnection of an existing USDA water line around the project site, and installation of approximately one mile of new force main that would tie into the USDA's existing sanitary sewer system south of the project site. Proposed utility locations and tie-ins must be clearly located and the LOD must be adjusted to account for their installation.
3. The LOD may also need to be adjusted to account for stable outfalls and rehabilitation of impacted assets.

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4. As previously noted, **the DEIS does not account for impact due to off-site work**. No LOD is shown for transportation mitigation.

XXII. Security and Facility Requirements

The DEIS does not provide information regarding ISC security standards for the CPF. Materials referenced in the DEIS indicate that a facility risk assessment was conducted in 2015, and that requirements for integrated security have previously analyzed. The security rating of the facility, explanation of the security rating, and a detailed list of applicable ISC security standards and CPF proposed security features (including setbacks and other relevant details), should be provided. Impacts of proposed security features should be accounted for in analyses. The DEIS would also benefit from an illustration of the anticipated space utilization, printing workflow, and components.

XXIII. Operational History of Existing Facility

Comments submitted by the City of Greenbelt during the public scoping period requested that the DEIS include the “Operational history of the current BEP facility, including researching violations and enforcement issues.” For the DEIS, project site investigations were conducted to characterize the environmental conditions of the project site and identify Hazardous and Toxic Materials and Waste (HTMW) resulting from past activities conducted within 0.25 miles of the project site (the ROI for HTMW), but it appears that no equivalent investigations were conducted for the current BEP facility. The associated Technical Memorandum states only that “To determine potential HTMW impacts, Treasury analyzed the existing conditions at the Proposed Site through site investigations”. No information regarding past violations and enforcement issues at the current BEP facility has been provided. The DEIS must be amended to include this information.

XXIII. Additional Concerns

1. Concerns were raised during the December 2, 2020, virtual public webinar regarding the apparent lack of input from residents of Odell Road. Treasury should proactively engage the residents of Odell Road in the NEPA process by conducting effective outreach and providing meaningful opportunities for residents and owners to voice comments and concerns.
2. Site design elements such as lighting and fencing must be designed in a context-sensitive manner to not further degrade wildlife, vegetation, and the human environment (e.g., the residences along Odell Road), etc., and to not impact any nearby research projects being conducted at BARC. Additionally, fencing must avoid impact to the movement of wildlife.
3. Staff notes the distinction between measures that Treasury *would* conduct (EMPs, RCMs, and BMPs) and measures that Treasury *may* conduct (mitigation measures) as part of the Proposed Action. To eliminate uncertainty in the next iteration of this document, the DEIS should clearly state which “mitigation measures” Treasury *would* pursue with each alternative presented.



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February 2, 2023

Mr. Marcel Acosta, Executive Director
National Capital Planning Commission
401 Ninth Street, NW
North Lobby, Suite 500
Washington, DC 20004

**RE: Bureau of Engraving and Printing (BEP)
BARC Currency Production Facility
MRF-2022-024**

Dear Mr. Acosta:

The Prince George's County Planning Board reviewed the proposed Currency Production Facility at their regular meeting on February 2, 2023. At this meeting, the Board voted to support and transmit the recommendations as amended, listed below. A copy of the staff report is enclosed for your information.:

1. The applicant is encouraged to create a comprehensive landscape plan for the site.
2. The applicant is encouraged to provide larger landscape buffers along Powder Mill Road and Odell Road where possible.
3. The applicant is encouraged to provide signage elevations to ensure size consistency between similar signage types, and enhance visibility for visitors.
4. The applicant is encouraged to coordinate with the Prince George's County Fire Department to ensure all access areas are constructed in compliance with Fire/EMS standards.
5. The applicant is encouraged to coordinate the implementation of the transportation impact study (TIS) preliminary design with all stakeholders in an effort to build a consensus with all affected parties before adopting a final design and construction plan.
6. The transportation improvements included in the TIS should be implemented by the Federal Bureau of Engraving and Printing. The improvements identified five roadway intersections as unacceptable, and they should be implemented prior to the opening of the facility in accordance with the operating agency.

If you have any questions, don't hesitate to contact Christine A. Osei at 301-952-3313 or via email at Christine.Osei@ppd.mncppc.org.

Sincerely,

Andree Green Checkley, Esq.
Planning Director

Enclosure

- c: David Warner, Principal Counsel, M-NCPPC, Legal Department
- Katina Shoulars, Division Chief, Planning Department, Countywide Planning Division
- Bobby Ray, AICP, Planning Supervisor, Countywide Planning Division
- Christine A. Osei, Planner III, Countywide Planning Division
- Donna J. Brown, Clerk of the Council, Prince George's County Council