

APPENDIX M:
PUBLIC AND AGENCY COMMENT RESPONSE MATRIX

Comment #	Comment # by Reviewer	Commenter ID#	Primary Comment Type	Secondary Comment Type	Comment	Response to Comment	Name	Organization (if applicable)
001	001	001	Federal & State Listed Species	Bats & Butterflies	I see the project was screened by the Corps using IPaC, and got northern long-eared bat (endangered), monarch butterfly (candidate), and tricolored bat (TCB, proposed endangered) on the species list. No updates to share at this time, but we are expecting TCB listing decision and additional Section 7 tools for bats to become available sometime this summer.	Acknowledged. BEP will recoordinate with USFWS if there are changes to guidance or uplisting of species.	Ray Li	USFWS
002	002	001	Federal & State Listed Species	Monarch Butterflies	The Service encourages Federal partners to consider voluntary actions to support monarch conservation. Possible actions might include establishing and maintainin pollinator habitat along roadside and utility right-of-ways.	The following text has been added to the SEA: "As design progresses, BEP would incorporate pollinator habitat in utility rights-of-way and roadways where possible." See Section 4.8.1.1.	Ray Li	USFWS
003	001	002	Transportation	Emergency Response	The United State Park Police has primary law enforcement jurisdiction along the Baltimore Washington Parkway and serves as the primary full-service law enforcement partner of BARC, operating through a Law Enforcement Assistance Agreement (LEAA)/Memorandum of Understanding (MOU). It is clear that the scope of this project will affect both the Baltimore Washington Parkway as well as the BARC in various ways pertaining to the modification of existing infrastructure as well as emergency response time from both USPP and other resources.	BEP is following guidance from USDA BARC regarding the removal of rumble strips, as it is the agency with jurisdiction on Powder Mill Road. The CPF Access Road includes signalization and a reduced speed limit from 35 to 25 mph on Powder Mill Road between West Animal Husbandry Road and Research Road, increasing vehicular safety. BEP will ensure vehicular safety on Powder Mill Road throughout the construction duration to the best of their ability by utilizing temporary traffic control measures.	Lt. Matthew Manning	NPS
004	002	002	Transportation	Emergency Response	The proposed actions at the interchange of the Baltimore Washington Parkway and Powder Mill Road should not have a significant impact on law enforcement or other emergency services response times in the area.	Acknowledged.	Lt. Matthew Manning	NPS
005	003	002	Transportation	Traffic Signal	Furthermore, the creation of signalized intersections at the bottom of the respective ramps and reconfiguration of the ramps and approaches on Powder Mill Road in creating dedicated turning and through lanes should assist greatly with mitigating motor vehicle collisions that occur at these intersections, particularly during peak travel times.	Acknowledged.	Lt. Matthew Manning	NPS
006	004	002	Transportation	Emergency Response	The proposed erection of traffic signals and repainting lane lines should not have a major impact on response times.	Acknowledged.	Lt. Matthew Manning	NPS
007	005	002	Transportation	Emergency Response	As the work on BARC is far more extensive, this most likely will cause increased response times, for other emergency response resources traversing through the property, depending on the actual scope at any given time.	BEP will continue to coordinate with the USPP and other emergency responders to update them on the construction timeline.	Lt. Matthew Manning	NPS
008	006	002	Transportation	Emergency Response	Powder Mill Road is a heavily trafficked major east-west roadway that cuts through the property linking the College Park/Beltsville area to the Laurel/Bowie area. As such, Prince George's County Fire Department utilizes it while responding to motor vehicle crashes, medical emergencies, fires and other emergencies, not only for incidents on the Baltimore Washington Parkway, but in the greater area as well.	Acknowledged. The following text was added to the SEA: "Letters were sent to emergency services including the Beltsville Police Department, Beltsville Volunteer Fire Department, and NPS United States Park Police (USPP) on April 1, 2024 to request input regarding the potential effects of the project on emergency services and schools. Of the services contacted, only the USPP responded on April 25, 2024. Please refer to Appendix A for coordination letters and the response from USPP. The letter from USPP states “the proposed actions at the interchange of the Baltimore Washington Parkway and Powder Mill Road should not have a significant impact on law enforcement or other emergency services response times in the area.” While the activities on BARC are more extensive and would likely cause increased response times for other emergency response resources traveling through the property, USPP states that “unless responding to a specific incident on the BARC property, USPP resources will not be affected in responses to areas on primary jurisdiction.” BEP will continue to communicate with emergency services throughout construction. " See Section 4.17.1.1.	Lt. Matthew Manning	NPS
009	007	002	Transportation	Emergency Response	However, unless responding to a specific incident on the BARC property, USPP resources will not be affected in responses to areas on primary jurisdiction.	Acknowledged.	Lt. Matthew Manning	NPS
010	008	002	Transportation	Emergency Response	It is imperative that traffic is permitted to flow along this corridor with as minimal interruptions as possible at any given time to ensure timely fire and EMS response.	Acknowledged. Added the following statement: "BEP will continue to communicate with emergency services throughout construction." See Section 4.17.1.1.	Lt. Matthew Manning	NPS
011	009	002	Transportation	Emergency Response	The same can be said about the Edmonston Road corridor between Greenbelt and Beltsville. USPP does not primarily traverse this corridor unless there is a specific call for service or while conducting a security check of the BARC property. The scope of the project in this area should not have a major impact on USPP operations.	Acknowledged.	Lt. Matthew Manning	NPS
012	010	002	Transportation	Rumble Strips	One additional area that is concerning is the planned removal of the rumble strips that are currently present along Powder Mill Road between the Baltimore Washington Parkway and Poultry Road. These traffic control devices were installed at the behest of USPP officials in the early to mid-2000s due to the proclivity for motor vehicle crashes in this corridor due to high speeds and the extremely curvy geometry of the roadway in this section. It certainly warrants further discussion of whether this is the best course of action if the removal of these rumble strips will again result in higher speeds and increased motor vehicle crashes or if another speed reduction strategy is needed, given the soon to be increased volume of traffic in the area.	Acknowledged. As the traffic mitigation design progresses, safety measures will continue to be evaluated. BEP will follow direction from USDA BARC regarding the removal of rumble strips, as they are the agency with jurisdiction on Powder Mill Rd.	Lt. Matthew Manning	NPS
013	001	003	Process	Time Extension Request	The Maryland Chapter of the Sierra Club is writing to request an extension of the comment period for the Bureau of Engraving and Printing Traffic and Utilities Mitigation Supplemental Environmental Assessment (EA). The EA is to evaluate potential environmental effects associated with the implementation of traffic, utility, and construction-related improvement measures associated with the proposed BEP replacement currency production facility in Beltsville, Maryland.	The comment period was originally from April 30, 2024 - June 2, 2024. On May 28, 2024 it was announced via NOA, stakeholder emails, and the BEP Replacement Project website that the comment period was extended to June 21, 2024. The extension was provided and communicated with the Maryland Chapter of the Sierra Club. This information can be found in Section 5.1 of the Final SEA.	Paula Posas	MD Chapter of the Sierra Club
014	002	003	Process	Page Numbers	The project document under review states that "This EA will be tiered from BEP's 2021 EIS, and the analyses included in the EIS will be incorporated into this EA by reference." This document is over 600 pages and the BEPS 2021 EIS is 316 pages.	The number of pages in the EIS exceeds 316 pages when considering the 14 tech reports and	Paula Posas	MD Chapter of the Sierra Club
015	003	003	Process	Communication	We note in the EA document that there is a lack of clarity about when the comment period is (see the below excerpt from the EA page 5-1). 3217 Public participation opportunities with respect to this EA and decision-making on the Proposed 3218 Action are guided by TD 75-02. A Notice of Availability (NOA) of the Draft EA and FONSI was 3219 published in the newspapers of record (listed below), announcing the availability of the Draft EA 3220 for review on [DATE TBD]. The NOA invited the public to review and comment on the Draft EA. 3221 The public and agency review period ended on [DATE TBD].	Understood and an extension of the Public Comment Period was provided.	Paula Posas	MD Chapter of the Sierra Club

016	004	003	Process	Communication	The EA document is also not clear about where comments should be submitted. No email address for comment submission appears to have been provided. If this request is not being sent to the correct contact emails now, please forward to the appropriate email address or addresses.	Acknowledged and corrective actions were taken to receive comments.	Paula Posas	MD Chapter of the Sierra Club
017	005	003	Process	Communication	The meeting materials likewise also do not indicate where to submit comments or the precise dates of the 30-day review period. What appears to be the 30-day comment period for this project included 10 days of weekend, multiple days of Easter and Passover, and Memorial Day Weekend. And many groups, including the Maryland Chapter of the Sierra Club, only belatedly learned that there was an open comment period.	Stakeholder invitations to both public meetings and each poster displayed at the meetings included the BEP Replacement Project website address "for more information" which included the email and physical addresses to send comments. All NEPA projects include a minimum 30-day comment period for scoping and drafts. Both Easter and Passover had ended by the start of the comment period on April 30, 2024. With the extension, the comment period included 37 weekdays. The NOA was published in the Washington Post and Greenbelt News Review and the Draft SEA was made available for review on the BEP Replacement Project website and at two local libraries and a community center.	Paula Posas	MD Chapter of the Sierra Club
018	006	003	Process	Communication	Some of the areas to be impacted, including Beaverdam Creek and surrounding areas, are of concern to our members, and they would like the opportunity to review the documents and make comments. They also have expressed project-related traffic and safety concerns.	Acknowledged.	Paula Posas	MD Chapter of the Sierra Club
019	007	003	Process	Time Extension Request	The public, stakeholders, and local groups have something to contribute with their insights, knowledge, and comments. The Bureau of Engraving and Printing and the U.S. Army Corps of Engineers are charged with supporting meaningful public engagement and participation, and the new project documentation requires time to read and understand. Given the points made above, sufficient time has not been granted for comments on this project.	A community meeting and public meeting was held and the standard 30-day comment period was extended for the public meeting. A list of agencies and individuals contacted since the publication of BEP's 2021 EIS is provided in Appendix J. This Proposed Action addresses many of the comments received during the scoping period for the EIS.	Paula Posas	MD Chapter of the Sierra Club
020	008	003	Process	Time Extension Request	Therefore we request an extension of the comment period by 30 days to allow for meaningful public participation and comment. Please reply with any notification of an extension as soon as possible so we can communicate it to members and partner groups.	The public comment period was extended and the MD Chapter of the Sierra Club was notified.	Paula Posas	MD Chapter of the Sierra Club
021	001	004	Transportation	General	NCPC has an advisory review authority for the portions of the project located on federal land in the environs pursuant to the National Capital Planning Act (40 U.S.C. § 8722(b)(1)). NCPC approved the final site and building plans for the BEP project on October 5, 2023. At that time, the Commission understood that the off-site traffic and utilities mitigation as recommended by the Traffic Impact Study (TIS) and in the BEP Environmental Impact Statement (EIS) would be reviewed separately. The proposed off-site work identified in the TIS and BEP EIS as mitigation for the proposed facility includes various improvements to the surrounding roadway network and intersections to reduce traffic congestion and the utility infrastructure improvements, such as wastewater treatment, necessary to accommodate the new facility. NCPC staff understands the Draft Supplemental EA evaluates the impacts of these mitigation measures.	Acknowledged.	Diane Sullivan	NCPC
022	002	004	Utilities	General	The Supplemental Draft EA illustrates two alternatives for sanitary sewer connection to the Washington Suburban Sanitary Commission (WSSC) treatment plant. Alternative 1 is the preferred alternative and proposes a connection at the north end of the project site, across Odell Road and Alternative 2 proposes a connection at the southwest corner of the BEP site and continues southwest through the BARC property until it meets the intersection of Edmonston and Powder Mill Roads. The Supplemental EA demonstrates that Alternative 1 has the least potential impact on water resources, vegetation, greenhouse gas emissions, habitat, air quality, and noise. Therefore, staff concurs with the Draft Finding of No Significant Impact (FONS!) in advancing Alternative 1.	Acknowledged.	Diane Sullivan	NCPC
023	003	004	Transportation	Bicycles	The Draft Supplemental EA demonstrates coordination with agency stakeholders and the public in development of the topics to be analyzed in the Supplement EA and refinements to the proposed traffic mitigation and utility plans. Staff notes that coordination with the public, Prince George's County, the City of Greenbelt, and the National Park Service, amongst others, is essential to the development of the Supplemental EA, the Commission's future review of the site plans, and the success of the project overall. In particular, Prince George's County and the City of Greenbelt have commented previously regarding bicycle infrastructure improvements within the project limits, which is of interest to NCPC as bicycle utilization was identified as a Transportation Demand Management (TDM) strategy in the BEP project approval.	Acknowledged. BEP will continue to coordinate with NCPC and Prince George's County.	Diane Sullivan	NCPC
024	004	004	Transportation	Bicycles	The approved Transportation Management Plan (TMP) for the BEP project provides anticipated modal split goals at the time of full-occupancy in 2031, for the short-term (5 years), and the long-term (10 years). The TMP anticipates that two percent of employees will utilize bicycle, motorcycle, pick-up/drop off, and/or walking as a commute mode in 2031, with an increase to five percent in 10 years through support of improvements to bicycle infrastructure in Prince George's County. The 2009 Countywide Master Plan of Transportation for bikeways and trails identifies a planned bike route (shared-use road) on Edmonston Road and planned bikes lanes on Powder Mill Road. The County is currently in the process of updating the Countywide Master Plan of Transportation and that document will examine both the roadway and bicycle network. The final document will provide recommendations for bicycle improvements within the vicinity of the future BEP facility.	Acknowledged. BEP will continue to coordinate with NCPC and Prince George's County.	Diane Sullivan	NCPC
025	005	004	Transportation	Bicycles	The County's update to its Master Plan of Transportation is timely and staff encourages coordination between the County and BEP regarding bicycle infrastructure on Edmonston and Powder Mill Roads as BEP's off-site plans include traffic improvements on both roads. Edmonston Road is a primary connection to the Greenbelt Metrorail Station and improved bicycle infrastructure would support bicycling as a TDM strategy as identified in the TMP. Further, extending the bicycle infrastructure improvements onto Powder Mill Road would enhance that connection as the primary entrance to the BEP facility is located on Powder Mill Road. Staff understands that the full length of Powder Mill and Edmonston Roads are not included in the scope of this project. However, including bicycle infrastructure in the off-site traffic and utility mitigation plans would support the goals of the approved TMP to enhance the mobility and transportation options available to BEP employees; to reduce emissions associated with employees using SOVs to commute to the facility; and to minimize the impact of the facility relocation on the surrounding roadway network.	Acknowledged BEP is a committed community partner within the Beltsville region.	Diane Sullivan	NCPC

					As such, the Supplemental EA and subsequent site plan submissions to NCPC should analyze and reflect the impact of incorporating the County's bicycle infrastructure recommendations for Edmonston and Powder Mill Roads on the scope of work, project timeline, and the use of bicycling as a commute mode.	Acknowledged. BEP is a committed community partner within the Beltsville region.		
026	006	004	Transportation	Bicycles			Diane Sullivan	NCPC
					Policies related to tree canopy and vegetation in the Comprehensive Plan encourage preservation and protection of existing trees, especially those that measure 31.85 inches in diameter (100 inches in circumference) or greater; transplantation of healthy, native, or non-invasive trees when practicable; and replacement of trees when removal is necessary. Per the Comprehensive Plan, the quantity of replacement trees necessary to mitigate tree removal is calculated based on a formula for individual trees which considers the tree species rating, tree condition, and the size of the tree collectively. For forest stands, the recommended replacement rate is a minimum of one acre planted for every one acre removed.	Acknowledged. BEP will comply with the FCA and NCPC's tree clearing requirement.		
027	007	004	Vegetation	Trees			Diane Sullivan	NCPC
					The Draft Supplemental EA indicates impacts will occur to vegetation on federal land, including BARC and the BW Parkway. The Draft Supplemental EA also indicates that mitigation would be compliant with the Maryland Forest Conservation Act and a Forest Conservation Plan would be developed if required. While the Maryland Forest Conservation Act may be applicable, staff notes that NCPC's tree preservation and replacement policies as outlined in the Comprehensive Plan shall apply to portions of the project located on federal property. As such, the Supplemental EA should include NCPC's tree preservation and replacement policies when referencing mitigation for tree removal.	Acknowledged. BEP will comply with the FCA and NCPC's tree clearing requirement. Text was updated as follows: "Mitigation would be in compliance with the NCPC's tree preservation and replacement policies, as outlined in the Comprehensive Plan for the National Capital, and Maryland Forest Conservation Act, and a Forest Conservation Plan would be developed if required" See Section 4.8.1.1.		
028	008	004	Vegetation	Trees			Diane Sullivan	NCPC
					The future site plan submissions to NCPC for review should demonstrate compliance with NCPC's tree preservation and replacement policies as outlined in the Comprehensive Plan and NCPC's Submission Guidelines. A copy of NCPC's Tree Preservation and Replacement Policy Resource Guide is attached to this letter for your reference.	Acknowledged. BEP will comply with the FCA and NCPC's tree clearing mitigation requirement.		
029	009	004	Vegetation	Trees			Diane Sullivan	NCPC
					As noted above, the off-site traffic and utility mitigation improvements located on federal land are subject to the review of NCPC. It is staff's understanding that preliminary plans for the proposed project will be submitted to the Commission in mid-2024 for review. The plans will then be referred by NCPC to the state and local agencies for a 60-day comment period, followed by a 30-day period for NCPC staff to review the comments and complete its review of the project and prepare it for Commission action. The preliminary plan submission should address the topics above, including tree preservation and replacement and coordination with public and agency stakeholders. A summary of the Commission's interest in each review stage and an outline of submission content can be found online at https://www.ncpc.gov/guidelines . If possible, NCPC encourages aligning the Commission's review with the public comment opportunities available through the NEPA process, including the review of the Draft Supplemental EA.			
030	010	004	General	Process		Acknowledged.	Diane Sullivan	NCPC
					The Environmental Assessment for traffic, utilities, and construction for the Bureau of Engraving and Printing's Currency Production Facility (CPF) raises several concerning issues about how the infrastructure around the site is designed.	Acknowledged.		
031	001	005	Utilities	General			Vijay Parameshwaran	
					The removal of the rumble strips on Powder Mill Road causes a serious traffic and safety hazard on that stretch of road. It is extremely easy for vehicles to exceed speed limits on it, and front visibility is low due to curves in the road. When combined with a significant amount of bicycle and pedestrian usage on that road, there's a strong likelihood of a fatal accident happening. This danger will only be intensified by the presence of the CPF commuter traffic and large trucks hauling materiel to and from the building.	Acknowledged. BEP will follow direction from USDA BARC regarding the removal of rumble strips, as they are the agency with jurisdiction on Powder Mill Rd. The CPF Access Rd. includes signalization and a reduced speed limit from 35 to 25 mph on Powder Mill Rd. between West Animal Husbandry Rd. and Research Rd., increasing vehicular safety. BEP will ensure vehicular safety on Powder Mill Rd. throughout the construction duration to the best of their ability by utilizing temporary traffic control measures.		
032	002	005	Transportation	Rumble Strips			Vijay Parameshwaran	
					The proposed Washington Gas line is puzzling, as the newsletter reports promote the CPF building as being an example of "green infrastructure" and "low impact" development. If the electricity would come from rooftop solar and installed Pepco electrical lines, what would the need for gas lines be? Would there be some combustion process happening as a part of the production activities, and how would carbon emissions be impacted?	Details regarding construction and operation of the proposed CPF are not within the scope of this SEA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.		
033	003	005	Utilities	Electricity			Vijay Parameshwaran	
					The supporting documentation states that the construction and the operation of the CPF "may affect" the northern long-eared bat. This requires more investigation, as it looks like the suggested next step is an Interim Consultation Framework. Although the northern long-eared bat was addressed, the monarch butterfly (<i>Danaus plexipus</i>) was not; it should be, as it is a protected species under the Endangered Species Act.	Details regarding construction and operation of the proposed CPF are not within the scope of this SEA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.		
034	004	005	Federal & State Listed Species	Bats & Butterflies			Vijay Parameshwaran	
					Alternatives 1 and 2 for the EA detail the proposed work to construct the sewer line for the WSSC system to be connected to the Blue Plains Advanced Wastewater Treatment Plant, but there is an open question as to if all industrial waste produced by the CPF would be pre-treated and sent through the sewage lines to WSSC, or some of it would be containerized and moved off-site by trucks. Which one is it? Or is it a combination of the two? The original EIS had suggested the latter as the solution, but this was before the decision was made to shift the water handling from Beaverdam Creek to WSSC lines. Although it is promising that the project does recognize the need for WSSC water handling, it remains an open question to see if the chemicals generated by the CPF processes can be handled directly by WSSC, which was never addressed in the original EIS.	As stated in the SEA, BEP would pre-treat all industrial wastewater to WSSC limitations in-house prior to discharge into the WSSC system.		
035	005	005	Utilities	Wastewater			Vijay Parameshwaran	
					Additionally, a major concern in the development and feedback in the original EIS was in the water of Beaverdam Creek. Although mitigation attempts were made in this EA with the planned WSSC connection, there is still surrounding water on the site with eight wetlands, six stream reaches, the two wells east of Poultry Road, and the planned bioswale area. Given that chemicals handling was never properly addressed for the CPF, these water regions are in danger of being polluted, especially the bioswale as its function serves for collecting runoff water.	Details regarding construction and operation of the proposed CPF are not within the scope of this SEA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.		
036	006	005	Water Resources	Surface Waters & Water Quality			Vijay Parameshwaran	

037	007	005	General	Traffic Signal	The entrance area to the CPF from Powder Mill Road looks as if it has to be entirely redone (new gravel road for well access, repaving Sheep Road, constructing a new entrance between Animal Husbandry Road and Poultry Road, removal of a segment of Poultry Road), and judging from the map, would significantly change the ecosystem of what is currently a simple turnoff from Powder Mill Road to Poultry Road. This far exceeds the stated intent of “intersection improvements” within traffic mitigation.	Acknowledged. Impacts to natural resources were documented in the SEA.	Vijay Parameshwaran	
038	008	005	Cultural Resources	Cultural Resources	Given that BARC is now being evaluated under the category of being a part of the National Register of Historic Places (NRHP), and that it and the Baltimore-Washington Parkway are designated as “cultural landscapes”, this calls into question the motivation for developing that land for the BEP. Why would this even be a consideration for development?	BEP has sought ways to minimize and avoid potential adverse effects to the BARC Historic District through consultation with Maryland Historic Trust (MHT) and other consulting parties through the Section 106 process. Examples of how the NRHP eligible landscape features have been considered: All construction laydown areas will be restored upon the completion of construction to minimize effects to BARC’s landscape. The proposed sewer and gas lines will be installed below ground to not disrupt the landscape’s appearance. The above ground utilities will be installed on poles similar in height and appearance to those utility poles already in use throughout BARC to minimize any potential visual impacts. New utility poles will be installed within existing utility corridors. The function of BW Parkway, Powder Mill, and Edmonston as major transportation routes through the historic districts for the public will be retained. While some individual trees may be impacted, no existing forest stands will be removed from the setting. No existing streams/water features will be removed/significantly redirected.	Vijay Parameshwaran	
039	009	005	General	General	In light of these concerns with regard to the Transportation and Utilities EA, the best decision to be made is to move the CPF to another part of Prince George’s County that is already within a developed industrial area (designated Industrial Employment IE or Industrial Heavy IH by the MNCPPC). This allows for transit of personnel and materiel to and from the facility easily by already-established highways and WMATA light rail/bus lines. Since already-established industrial areas would be there, any connection to utilities such as power and water/sewage would already be there, and would be appropriately adjusted for handling dangerous chemicals. Since construction of the CPF has not started yet, this is the perfect time to move the current design to a new location and make some adaptations to the new site. This would be beneficial to BARC for its environmental health and a renewed purpose for agricultural research, while still having a CPF in the County to continue its mission.	Details regarding construction and operation of the proposed CPF are not within the scope of this SEA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.	Vijay Parameshwaran	
040	001	006	General	General	The City Council reviewed the BEP Draft Environmental Assessment (EA) for Traffic and Utilities Mitigation at a regularly scheduled meeting on May 29, 2024. As you are aware, the City has consistently opposed the relocation of this facility and continues to do so. Despite the City’s opposition, the Department of the Treasury has made the decision to relocate to the Beltsville Agricultural Research Center (BARC). Therefore, these comments are offered in order to improve the overall project and help mitigate its impacts on the residents of Greenbelt.	Acknowledged. Details regarding construction and operation of the proposed CPF are not within the scope of this SEA	Emmett Jordan	Greenbelt City Council
041	002	006	General	Process	As the Applicant has further developed the project over the last few years, they have addressed many of the previous comments provided by the City in late February and early March of 2021, mostly notably a reduction in parking, improved on-site pedestrian and bicycle circulation, and revised building materials.	Acknowledged.	Emmett Jordan	Greenbelt City Council
042	003	006	Transportation	General	Of greatest concern to the City is the proposed widening of MD 201/Edmonston Road. The Draft EA proposes widening MD 201/Edmonston Road from approximately 0.2-miles south of Sunnyside Avenue to just north of Powder Mill Road. Project number 12 in Table 4-1 of the Draft EA, “Ongoing and Reasonably Foreseeable Future Developments”, cites the National Capital Region Transportation Planning Board (NCR TPB) for a Maryland Department of Transportation (MDOT) widening project along 4.5 miles of MD 201 from the Beltway to the Intercounty Connector. However, this project, formerly known as “MD 201 Extended”, was removed from the most recent Maryland State Consolidated Transportation Program (CTP), FY 2024-2029. Additionally, MDOT has not resubmitted its long-range plan project, labeled with project ID CE1204, for inclusion in NCR TPB’s Visualize 2050 version of the National Capital Region Transportation Plan (NCRTP) expected to be approved in 2025. The City also questions the functionality of MD 201/Edmonston Road narrowing to two (2) lanes from four (4) just north of Cherrywood Lane and then widening back out to four (4) lanes, as indicated in the figures provided in the Draft EA.	Acknowledged. Cumulative impact analysis was updated and revised as follows: "The Greenbelt City Council stated that the "MD 201 Extended" was removed from the most recent Maryland State Consolidated Transportation Program, fiscal year (FY) 2024-2029. As a result, the MD 201 Extended project is not further analyzed in the SEA." See Table 4-1, project number 12. Please see the EIS for the roadway mitigation design discussion	Emmett Jordan	Greenbelt City Council
043	004	006	Transportation	Bicycles	Concerning active transportation, the Circulation element of USACE’s Final Site and Building Report submission to NCPC (August 2023) stated in the Detailed Strategies of the required Transportation Management Plan (TMP) that the project would include the following “Bicycle Support”: • Support improvement of bicycle infrastructure in Prince George’s County and expand transit subsidy to include bicycle commute; • Prince George’s County Bicycle Master Plan proposes improved bicycle infrastructure near BEP CPF; and • Master Plan includes bike lanes on Edmonston Road (MD 201), Powder Mill Road, Odell Road, Beaver Dam Road, and Springfield Road.	Acknowledged. BEP is a committed community partner within the Beltsville region and Prince George’s County.	Emmett Jordan	Greenbelt City Council
044	005	006	Transportation	Bicycles	Other than stating that “[p]roposed improvements [along Edmonston Road] include accommodations to become more bicycle friendly”, the Draft EA does not directly address or indicate that the Proposed Action will include previously supported improvements for pedestrians and bicyclists.	Acknowledged. Bicycle improvements will continue to be considered as design progresses within the limits of the Proposed Action for the traffic improvements.	Emmett Jordan	Greenbelt City Council
045	006	006	Transportation	General	The City anticipated that the Draft EA would address needed vehicle, pedestrian, and bicycle improvements along Edmonston Road, the Powder Mill Road frontage, and all other intersections identified for mitigation, and that roadway impacts incurred during this project would be reconstructed with all Prince George’s County master-planned bicycle and pedestrian facilities, as identified in the current Countywide Master Plan of Transportation. Those planned facilities include: • Powder Mill Road: Designated bike lanes along MD 212 through BARC • Odell Road: Designated bike lanes between Muirkirk Road and Edmonston Road/Old Baltimore Pike • Beaverdam Road: Designated bike lanes between MD 210 and Springfield Road • Springfield Road: Designated bike lanes between Odell Road and MD 564	Acknowledged. BEP is a committed community partner within the Beltsville region and Prince George's County. Bicycle improvements will continue to be considered as design progresses within the limits of the Proposed Action for the traffic improvements.	Emmett Jordan	Greenbelt City Council

					Overall, the Draft EA’s acute focus on easing vehicular level of service (LOS), while only tangentially addressing the need for safe active transportation infrastructure, is concerning. By not addressing the opportunity to improve the targeted roadways to also include previously planned pedestrian and bicycle infrastructure, the Draft EA appears to fall short of the previous assurances in the Transportation Management Plan (TMP) and Transportation Demand Management (TDM) strategies included in the Final Site and Building Report as presented to NCPC and the public in August 2023.	Acknowledged. BEP is a committed community partner within the Beltsville region and Prince George's County. Bicycle improvements will continue to be considered as design progresses within the limits of the Proposed Action for the traffic improvements.		
046	007	006	Transportation	Bicycles			Emmett Jordan	Greenbelt City Council
047	001	007	Transportation	Traffic Signal	If the plan [is] to have 4 lanes on Edmonston Rd then we need a signal traffic light to get to our homes and work on Beaverdam. You'll be killing us if you don't put [a] traffic light at Beaverdam Rd!	The January 2024 community meeting provided an opportunity to understand the Beaverdam Road situation. In turn, BEP has provided this coordination with the State and County: After the local community meeting on January 17, 2024, SHA, PG County, amd USACE met on February 6, 2024, to discuss the safety concerns raised about the MD-201/Edmonston Rd. intersection at Beaver Dam Rd. SHA and PG County recommended that turn lanes be included in the design of the Proposed Action. From a traffic modeling perspective, there are not enough vehicle counts to justify a light at the Edmonston/Beaver Dam intersection. See Section 4.14 Transportation for more detail.	Public Meeting commenter #1	
048	001	008	Transportation	Traffic Signal	If you don't get us a traffic light at Beaver Dam Rd it's gonna be bad for all of us. Real bad! I live on Rosedale Lane for 25 yrs not [counting] years when I was little. It's beautiful here. What's gonna happen now?	The January 2024 community meeting provided an opportunity to understand the Beaverdam Road situation. In turn, BEP has provided this coordination with the State and County. After the local community meeting on January 17, 2024, SHA, PG County and USACE met on February 6, 2024, to discuss the concerns raised about the MD-201/Edmonston Rd. intersection at Beaver Dam Rd. SHA recommended that turn lanes be included in the design of the Proposed Action. From a traffic modeling perspective, there are not enough vehicle counts to justify a light at the Edmonston/Beaver Dam intersection. See Section 4.14 Transportation for more detail.	Public Meeting commenter #2	
049	001	009	Transportation	Traffic Signal	I am requesting the consideration of a traffic control measure, specifically a stop light or roundabout, at the intersection of Beaver Dam and Edmonston. This intersection is already difficult, particularly if turning south off Beaver Dam. Implementing a stop light or roundabout would benefit the safety of the Rosedale neighborhood.	The January 2024 community meeting provided an opportunity to understand the Beaverdam Road situation. In turn, BEP has provided this coordination with the State and County. After the local community meeting on January 17, 2024, SHA, PG County and USACE met on February 6, 2024, to discuss the concerns raised about the MD-201/Edmonston Rd. intersection at Beaver Dam Rd. SHA recommended that turn lanes be included in the design of the Proposed Action. From a traffic modeling perspective, there are not enough vehicle counts to justify a light at the Edmonston/Beaver Dam intersection. See Section 4.14 Transportation for more detail.	Connor Turley	
050	001	010	Transportation	Traffic Signal	Need a light at Beaver Dam and Edmonston.	The January 2024 community meeting provided an opportunity to understand the Beaverdam Road situation. In turn, BEP has provided this coordination with the State and County. After the local community meeting on January 17, 2024, SHA, PG County and USACE met on February 6, 2024, to discuss the concerns raised about the MD-201/Edmonston Rd. intersection at Beaver Dam Rd. SHA recommended that turn lanes be included in the design of the Proposed Action. From a traffic modeling perspective, there are not enough vehicle counts to justify a light at the Edmonston/Beaver Dam intersection. See Section 4.14 Transportation for more detail.	Mike Boone	
051	001	011	Transportation	Powder Mill Bridge	I'm concerned about the Powder Mill Bridge. It is very narrow. New striping will be the entire answer. Will your trucks be going over it? During construction and during running of BEP?	The January 2024 community meeting meeting concerns were raised to SHA. SHA held a follow up meeting on 6 February 2024 to discuss visibility concerns along Powder Mill Road at the crossing over the CSX railroad tracks. A work order was sent to the SHA District 3 Construction Team to address the condition of pavement markings on the Powder Mill Road bridge between Edmonston Road and U.S. 1 and to install edge lines on Powder Mill Road between Cook Road and U.S. 1 in order to enhance lane markings and provide reference points for residents when driving at night and during inclement weather. These improvements will be completed before the start of this Project and the CPF construction	Kathy Bartolomeo	
052	002	011	Climate Change & Greenhouse Gas	Emissions	Offset of GHG - how will it be mitigated, especially with all the diesel trucks in construction and also trucks used daily/nightly.	The SEA evaluated impacts to GHG and identified potential mitigation to reduce production of GHGs during construction.	Kathy Bartolomeo	
053	003	011	Transportation	General	It is a shame a site was not selected that was closer to mass transit.	Details regarding construction and operation of the proposed CPF are not within the scope of this SEA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.	Kathy Bartolomeo	
054	004	011	Hazardous & Toxic Materials & Waste	General	Where do[es] the toxic waste go?	Hazardous and toxic materials and waste was evaluated in Section 4.16 of the SEA.	Kathy Bartolomeo	
055	001	012	Transportation	Traffic Signal	No esta claro como funcionara la interseccion de Edmonston y Beaver Dam Road. Seria bueno por cuestiones de seguridad la instalacion de un traffic light. El trafico en las horas pico (rush hours) es muy posado para girar tanto a la derecha como a la izquierda.	The January 2024 community meeting provided an opportunity to understand the Beaverdam Road situation. In turn, BEP has provided this coordination with the State and County. After the local community meeting on January 17, 2024, SHA, PG County and USACE met on February 6, 2024, to discuss the concerns raised about the MD-201/Edmonston Rd. intersection at Beaver Dam Rd. SHA recommended that turn lanes be included in the design of the Proposed Action. From a traffic modeling perspective, there are not enough vehicle counts to justify a light at the Edmonston/Beaver Dam intersection. See Section 4.14 Transportation for more detail.	Luis Saldivar	
056	001	013	Process	Time Extension Request	The EA document was released for public review at the end of April, with a deadline of June 2. This gives approximately one month for us to read and process a document that is approximately 650 pages long. It would be prudent to extend the comment period by another month in order to be able to have a good comment and feedback.	Acknowledged and an extension of the Public Comment Period was provided.	Vijay Parameshwaran (public meeting comment)	
057	001	014	Water Resources	Surface Waters & Water Quality	Please provide results of Tier II Antidegradation Review.	The Tier II Antidegradation Review will be completed during the permitting phase and prior to construction.	Marian Dombroski	

						<p>The January 2024 community meeting provided an opportunity to understand the Beaverdam Road situation. In turn, BEP has provided this coordination with the State and County.</p> <p>After the local community meeting on January 17, 2024, SHA, PG County and USACE met on February 6, 2024, to discuss the concerns raised about the MD-201/Edmonston Rd. intersection at Beaver Dam Rd.</p> <p>SHA recommended that turn lanes be included in the design of the Proposed Action.</p> <p>From a traffic modeling perspective, there are not enough vehicle counts to justify a light at the Edmonston/Beaver Dam intersection.</p>		
058	001	015	Transportation	Traffic Signal	Need light at Beaver Dam and Edmonston. I have seen at least a dozen accidents and more cars will make it more dangerous than ever. Please just put a light in.	See Section 4.14 Transportation for more detail.	Robert Hofstetter	
						<p>The January 2024 community meeting provided an opportunity to understand the Beaverdam Road situation. In turn, BEP has provided this coordination with the State and County.</p> <p>After the local community meeting on January 17, 2024, SHA, PG County and USACE met on February 6, 2024, to discuss the concerns raised about the MD-201/Edmonston Rd. intersection at Beaver Dam Rd.</p> <p>SHA recommended that turn lanes be included in the design of the Proposed Action.</p> <p>From a traffic modeling perspective, there are not enough vehicle counts to justify a light at the Edmonston/Beaver Dam intersection.</p>		
059	001	016	Transportation	Traffic Signal	We need a traffic light at Edmonston Rd and Beaver Dam Rd. It's awful all this.	See Section 4.14 Transportation for more detail.	Elva Brocht/Roy Brocht	
						<p>The January 2024 community meeting provided an opportunity to understand the Beaverdam Road situation. In turn, BEP has provided this coordination with the State and County.</p> <p>After the local community meeting on January 17, 2024, SHA, PG County and USACE met on February 6, 2024, to discuss the concerns raised about the MD-201/Edmonston Rd. intersection at Beaver Dam Rd.</p> <p>SHA recommended that turn lanes be included in the design of the Proposed Action.</p> <p>From a traffic modeling perspective, there are not enough vehicle counts to justify a light at the Edmonston/Beaver Dam intersection.</p>		
060	002	016	Transportation	Traffic Signal	4 lanes is real bad for us to get to our homes. We need a light to get to Beaver Dam Rd from Edmonston.	See Section 4.14 Transportation for more detail.	Elva Brocht/Roy Brocht	
						<p>The January 2024 community meeting provided an opportunity to understand the Beaverdam Road situation. In turn, BEP has provided this coordination with the State and County.</p> <p>After the local community meeting on January 17, 2024, SHA, PG County and USACE met on February 6, 2024, to discuss the concerns raised about the MD-201/Edmonston Rd. intersection at Beaver Dam Rd.</p> <p>SHA recommended that turn lanes be included in the design of the Proposed Action.</p> <p>From a traffic modeling perspective, there are not enough vehicle counts to justify a light at the Edmonston/Beaver Dam intersection.</p>		
061	001	017	General	General	I live on Cochran Road, just over the hill from the proposed site for the proposed Bureau of Engraving and Printing printing plant on the USDA Agricultural Research Farm. I want you to know that I am 1000% totally opposed to locating a printing plant on the USDA Farm. I have lived here many years, as have many of my neighbors. Every neighbor I have talked to on Cochran Road was completely unaware of this looming change and they were shocked and unhappy when I told them about this plan. We have chosen to live where we do, adjacent to the Farm, because it is a quiet and very beautiful area.	<p>Acknowledged.</p> <p>Details regarding construction and operation of the proposed CPF are not within the scope of this SEA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.</p>	Carol Camero	
						<p>Acknowledged.</p> <p>Details on numbers of trucks for the construction and operation of the CPF was outlined in the EIS and are not part of the scope of the SEA.</p>	Carol Camero	
062	002	017	Transportation	General	Locating a printing facility, much less a 24-hour production plant, on the Farm, is completely unacceptable, unwanted and a very bad idea. We do not want Kenilworth Avenue/Edmonton expanded to a multilane highway. We do not want Powder Mill Road expanded to accommodate truck traffic. Moreover, the road expansion is totally unwarranted and uncalled for, since (as I was told at the recent public meeting) the projected vehicle traffic was 24 trucks per day.	<p>Acknowledged.</p> <p>Details on numbers of trucks for the construction and operation of the CPF was outlined in the EIS and are not part of the scope of the SEA.</p>	Carol Camero	
						<p>Acknowledged.</p> <p>Details regarding construction and operation of the proposed CPF are not within the scope of this SEA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.</p>	Carol Camero	
063	003	017	General	General	Rather than steal acreage from the USDA, and make all of these undesired changes to the Farm and the surrounding access roads, please relocate your project to an existing industrial area, of which there are many around the Washington/Maryland/Virginia area. There are industrial sites in Beltsville, if that is where you think you need to be - but there are hundreds of additional industrial sites all across the DMV that already have the power and water infrastructure needed for your operation and are well suited for your traffic needs.	<p>Acknowledged.</p> <p>Details regarding construction and operation of the proposed CPF are not within the scope of this SEA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.</p>	Carol Camero	
						<p>Acknowledged.</p> <p>Details regarding construction and operation of the proposed CPF are not within the scope of this SEA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.</p>	Carol Camero	
064	004	017	General	General	I believe the reason that you want to build your facility on the Ag Farm is because you, like us residents, have discovered the sublime beauty of the area and fancy a commute to this wonderful farm site. But, in doing so, you are destroying/devouring that which you have already admired. An industrial printing plant belongs in an industrial park area and not on the Ag Farm. Whose could have thought otherwise?	<p>Acknowledged.</p> <p>Details regarding construction and operation of the proposed CPF are not within the scope of this SEA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.</p>	Carol Camero	
						<p>Acknowledged.</p> <p>Details regarding construction and operation of the proposed CPF are not within the scope of this SEA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.</p>	Carol Camero	
065	006	017	General	General	I beg you to halt this misguided project, change direction, and do the right thing: locate your printing facility where it belongs, in an industrial-zoned area. I worked at a printing facility for the Washington Post for many years, and I am very familiar with the impact of such a facility. Please alter course and do the right thing.	<p>Acknowledged.</p> <p>Details regarding construction and operation of the proposed CPF are not within the scope of this SEA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.</p>	Carol Camero	
						<p>Acknowledged.</p>	Carrie Traver	EPA
066	001	018	General	General	We agree that of the two action alternatives presented for the sanitary sewer line, the Preferred Alternative has fewer impacts and would be environmentally preferable. We support selection of Alternative 1 to reduce impacts to streams and wetlands, trees, water quality, habitat, and other sensitive resources.	<p>The following text was added to the SEA: "The permanent WSSC easement width would be 25 feet total and the temporary construction easement would range from 25 feet to 60 feet wide. The temporary construction easement would include area for laydown." See Sections 2.1.1 and 2.1.3.</p>	Carrie Traver	EPA
						<p>The following language was added to the SEA, "Prior to construction, the Government would require the contractor to develop a noise suppression plan and monitoring program for the Proposed Action." See Section 4.4.1.1.</p>	Carrie Traver	EPA
067	002	018	Utilities	General	For clear analysis of both potential impacts and opportunities for avoidance, we recommend including width of construction and maintained right of ways (ROWS) for the sewer line.	<p>The noise suppression plan and monitoring program are not part of this SEA.</p>	Carrie Traver	EPA
						<p>The following language was added to the SEA, "Prior to construction, the Government would require the contractor to develop a noise suppression plan and monitoring program for the Proposed Action." See Section 4.4.1.1.</p>	Carrie Traver	EPA
068	003	018	Noise	Suppression Plan	As stated on p 3-5 and shown in Figure 3-10, residences are located in close proximity (within 50 feet) to Odell Road, Edmonston Road, Ellington Drive, and the sanitary sewer alignment for Alternative 1. Section 4.4 indicates that a noise suppression plan would be prepared by BEP or its contractors to identify ways to minimize noise impacts to surrounding residents and businesses during construction activities. The EA indicates that a significant impact would occur if noise levels for sensitive receptors exceed 85 dBA with the plan.	<p>The following language was added to the SEA, "Prior to construction, the Government would require the contractor to develop a noise suppression plan and monitoring program for the Proposed Action." See Section 4.4.1.1.</p>	Carrie Traver	EPA
						<p>The noise suppression plan and monitoring program are not part of this SEA.</p>	Carrie Traver	EPA
069	004	018	Noise	Suppression Plan	The EA concludes "With implementation of these impact-reduction measures and others listed in Section 0, short-term noise impacts would be less than significant." However, the only specific measure indicated in the EA to reduce noise impacts is "Conduct work on weekdays during standard daylight working hours." (Table C-1). We recommend indicating likely components of the noise suppression plan or other measures that will be taken (mufflers, barriers, etc.).	<p>The noise suppression plan and monitoring program are not part of this SEA.</p>	Carrie Traver	EPA

070	005	018	General	Suppression Plan	As the EA does not include information regarding the plan, to inform affected residents EPA suggests that they be provided with information regarding the noise suppression plan and/or given a chance to provide input in the future.	<p>The following language was added to the SEA, "Prior to construction, the Government would require the contractor to develop a noise suppression plan and monitoring program for the Proposed Action." See Section 4.4.1.1.</p> <p>The noise suppression plan and monitoring program are not part of this SEA.</p>	Carrie Traver	EPA
071	006	018	General	Suppression Plan	As a best practice, we recommend providing a staffed phone number for noise or other construction concerns to nearby properties. A construction monitor may be helpful to respond to such complaints.	<p>The following language was added to the SEA, "Prior to construction, the Government would require the contractor to develop a noise suppression plan and monitoring program for the Proposed Action." See Section 4.4.1.1.</p> <p>The noise suppression plan and monitoring program are not part of this SEA.</p>	Carrie Traver	EPA
072	007	018	Environmental Justice	General	Section 3.11 includes data from several screening tools. It would be helpful to clearly state if it has been determined that the 5 listed block groups are communities with environmental justice concerns based on this data and/or public input. We note that while the Climate and Economic Justice Screening Tool (CEJST) did not identify disadvantaged communities, the specific purpose of the CEJST is to target Justice40 investment benefits .	<p>Section 3.11.1 does include a summarized statement regarding the way each of the screening tools identified the EJ ROI. In the Final SEA, this sentence has been added to the start of Section 3.11: "Based on the methodology described below, the five BGs included in the EJ ROI were determined to represent communities with EJ concerns for the purposes of this SEA."</p>	Carrie Traver	EPA
073	008	018	General	Local Benefits	We appreciate the inclusion of outreach materials and a description of efforts to date. We recommend the Final EA be updated to indicate how feedback from the local residents and other stakeholders has or will be used to inform the design of the project and mitigation measures.	<p>The comments received from local residents and other stakeholders, including both public meetings, are included and addressed as appropriate in this matrix and throughout the Final SEA.</p>	Carrie Traver	EPA
074	009	018	General	General	Community comments do not appear to be listed in the appendices; we recommend including this in the final EA and also suggest providing further detail regarding the public meetings on January 17th and May 13th, 2024, including the number of participants, major concerns expressed, how they were addressed, etc.	<p>Community comments and a response matrix for the 17 January 2024 meeting are in Appendix K in the Final SEA. Meeting details and community comments for the 13 May 2024 meeting are in Appendix L in the Final SEA. A response matrix for public and agency comments received during the public comment period are in Appendix M in the Final SEA.</p>	Carrie Traver	EPA
075	010	018	General	General	Overall, we continue to recommend employing a range of best management practices to reduce the potential for adverse impacts on nearby residents. Continued outreach to the surrounding community to inform appropriate mitigation measures is essential.	<p>Public engagement and outreach will continue for the duration of the project primarily via the BEP Replacement Project website at https://www.nab.usace.army.mil/BEP/ and through the quarterly newsletters.</p>	Carrie Traver	EPA
076	011	018	Environmental Justice	General	Table 3-13 is titled "Low Income Population in the EJ ROI Block Groups Compared to State and U.S." but the third column is labeled as "Less Than High School Education." Please revise for clarity.	<p>Thank you for the correction. Table 3-13 was removed as the educational attainment data was in Table 3-11 and the poverty data was in Table 3-14 in the Draft SEA.</p>	Carrie Traver	EPA
077	012	018	Health & Public Safety	General	As outlined in Section 3.12, children "may suffer disproportionately from environmental health risks." However, children's health is not clearly addressed in the EA. While children are not expected to be present in the work zone, except as vehicle passengers (4.13.1.1), a number of residences are in proximity to the construction areas. Section 4.13 should more clearly address impacts such as noise, dust, and diesel emissions to children that may reside in the vicinity.	<p>The SEA was revised as follows to more clearly describe lack of impacts to children near roadway and sewer construction: "While children would not be directly exposed to construction zones except as passengers in vehicles, children living in residences adjacent to construction zones may be indirectly affected by noise, dust, and emissions from construction activities. These impacts would be less than significant due to implementation of impact-reduction measures listed in Appendix B. For additional information on potential impacts due to noise, dust, and emissions from construction, please refer to Sections 4.4 and 4.5." See Section 4.13.1.1.</p>	Carrie Traver	EPA
078	013	018	Climate Change & Greenhouse Gas	Emissions	We appreciate the inclusion of estimates of greenhouse gas (GHG) emissions and the social cost of carbon in the EA. However, both Sections 3.5.3 and 4.6 state that the Project's contribution to climate change would be negligible or unmeasurable at a regional or global level. While we agree GHG emissions from the Proposed Action appear to be relatively small, please note that the January 9, 2023 CEQ interim guidance on GHG and Climate Change indicates that stating emissions from a proposed Federal action represents only a small fraction of global emissions is not a useful way to evaluate the project's contributions to climate change as "this approach does not reveal anything beyond the nature of the climate change challenge itself—the fact that diverse individual sources of emissions each make a relatively small addition to global atmospheric GHG concentrations that collectively have a large effect." Instead, we recommend identifying measures that will be taken to minimize GHG emissions or enhance climate resiliency as encouraged by the CEQ guidance.	<p>Section 4.6.1.1 of the SEA has been updated to explain how the following measures to minimize GHG emissions would be incorporated into construction of the Proposed Action outlined in the SEA:</p> <ul style="list-style-type: none">- Use of Tier 4 engines for construction machinery will be recommend.- Minimize idling to 5 minutes or less will be recommended.- Use low-sulfur diesel or biodiesel when possible.- Recycled asphalt pavement (RAP) will be utilized where safe to do so.- Prepare final design to minimize tree removal and replant where possible,- Use LED lights for all temporary construction lighting, where safe to do so,- Utilize locally-sourced materials to reduce transportation emissions where applicable as recommended.	Carrie Traver	EPA
079	014	018	Water Resources	Surface Waters and Water Quality	As described, the surface water resources in the project area include Indian Creek and Beaverdam Creek and their tributaries, which are tributaries to the Anacostia River. Beaverdam Creek is designated as a high quality (Tier II) stream and Indian Creek and its extensive riparian wetlands have been mapped as providing significant habitat. The EA would benefit from expanded analysis to indicate how water quality protection will be achieved.	<p>Acknowledged.</p> <p>A Tier II Antidegradation Permit will be secured during permitting process to ensure water quality protection.</p>	Carrie Traver	EPA
080	015	018	Water Resources	Stormwater	The proposed work for the Baltimore-Washington Parkway would include the conversion of approximately 0.2 acre of roadside grass to pavement, but no other estimates of impervious area appear to be included in the EA. While we understand it is early in the design process, and BARC is evaluating options to reduce impervious surfaces, it would be helpful to estimate the increase in maximum impervious area for all components of the project, including the area to be added in the floodplain.	<p>Acknowledged. The following text was added to the SEA: "The total increase in impervious surface includes approximately 7.5 acres. The breakdown is as follows: 0.2 acres for the Baltimore-Washington Parkway; 2.1 acres for the CPF Access Road and Well Access Road Area; and 5.2 acres for Edmonston Road Area. " See Section 4.7.1.1.</p>	Carrie Traver	EPA
081	016	018	Water Resources	Stormwater	To support decision-making, it would be helpful to identify conceptual locations of stormwater management practices as early as possible so that additional impacts to Waters of the US could be avoided, including discharges that may adversely impact wetlands.	<p>Acknowledged.</p> <p>BEP will comply with MDE stormwater regulations and this will be completed during the permitting process.</p>	Carrie Traver	EPA
082	017	018	Water Resources	Stormwater	Section 3.6.4 indicates that none of the sites associated with this project have existing stormwater management systems. Given the proximity of Edmonston Road and Powder Mill Road to Indian Run and its wetlands, it is critical to ensure that stormwater will not cause additional adverse effects. While detailed engineering and permitting will occur at a later date, we recommend including a conceptual plan or committing to a range of BMPs to protect the Indian Run watershed. We also suggest indicating how BEP intends to meet the requirements of the Tier II review, including the no-discharge alternatives analysis.	<p>Acknowledged.</p> <p>The following language was added to the SEA, "BEP will use Environmental Site Design practices including, but not limited to submerged gravel wetlands, micro-bioretenion, and/or swales to the maximum extent practicable in accordance with the 2000 Maryland Stormwater Design Manual." See Section 4.7.1.1.</p> <p>Appropriate stormwater management BMP measures will be further defined during the permitting actions associated with the Proposed Action including a Tier II Antidegration Review through Maryland Department of the Environment.</p>	Carrie Traver	EPA
083	018	018	Water Resources	Floodplains	Section 4.7.1.1 indicates that the "minor expansion" of the existing roadway along Edmonston Road would have less than significant impacts to the adjacent 100-year floodplain, but it unclear how this has been assessed. We recommend indicating the information evaluated to support this conclusion. Further, we recommend fully considering potential impacts on flooding, which may be exacerbated by climate change, in this analysis.	<p>The design team is looking at options to completely avoid any impact to the floodplain. If impacts to the floodplain cannot be avoided based on the LOD that were analyzed in the SEA, the required coordination and additional floodplain impact modeling will be completed in coordination with the required regulatory agencies.</p>	Carrie Traver	EPA
084	019	018	Water Resources	Wetlands	The EA indicates that proposed traffic and utility improvements associated with Alternative 1 would likely impact Wetlands 1, 3, 4-b, and 8, resulting in approximately 0.5 acre of wetland impact within the Project Area. The EA lacks analysis of potential impacts, minimization, and mitigation of wetlands and their functions.	<p>As Design progresses, wetland minimization measures and avoidance will be evaluated. In addition, mitigation measures will be further defined during the permitting actions associated with the Proposed Action.</p>	Carrie Traver	EPA

085	020	018	Water Resources	Wetlands	Based on Table 3-4 and the wetland delineation report, Wetlands 1, 3, and 4 are palustrine forested wetlands associated with Indian Run tributaries. All are Cowardin class PFO1E, indicating wetlands with broad-leaved deciduous vegetation and a seasonally flooded/saturated water regime. These wetlands appear to be associated with the floodplain and mapped Forest Interior Dwelling Species (FIDS) habitat, suggesting important water quality, floodwater attenuation, and habitat functions.	Acknowledged.	Carrie Traver	EPA
086	021	018	Water Resources	Wetlands	“Wetland 4-b” as shown on Figure 3-11, appears to be delineated as WUS-4, a stream, in the wetland delineation. Please clarify this impact.	Figure has been revised for consistency with the wetland delineation report.	Carrie Traver	EPA
087	022	018	Water Resources	Wetlands	Wetland 8 at the intersection of Powder Mill and Animal Husbandry Road is connected to WUS-4 via a culvert. It is classified as a palustrine emergent wetland with a seasonally flooded/saturated water regime (PEM1E). While the dominant vegetation observed was Typha latifolia and Juncus effusus, the delineation notes that “A few bald cypress (Taxodium distichum) were growing on the perimeter.” It would be helpful to clarify if impacts to Taxodium distichum will be avoided.	Acknowledged. Wetland mitigation measures and avoidance and minimization measures will be further defined during the permitting actions associated with the Proposed Action.	Carrie Traver	EPA
088	023	018	Water Resources	Wetlands	Impacts to Wetland 2 appear to be proposed from the figures but are not discussed. It is unclear if a jurisdiction determination has been made, but the wetland delineation indicates that jurisdiction of the wetlands has not been verified by USACE or Maryland Department of the Environment (MDE.) Regardless of jurisdictional status, the EA should address impacts to this resource and its functions, if proposed.	Acknowledged. Wetland mitigation measures and avoidance and minimization measures will be further defined during the jurisdictional determination and permitting actions associated with the Proposed Action.	Carrie Traver	EPA
089	024	018	Water Resources	Wetlands	It would be helpful to include a figure that shows the location of the data points in the Wetland Determination Data Forms.	Data points for Wetland Determination Data Forms have been added to Figure 3-11.	Carrie Traver	EPA
090	025	018	Water Resources	Wetlands	Section 4.7.1.1 states “All these impacts would be completely mitigated according to 404(b)(1) guidelines and State 401 Water Quality Certification, as outlined in Section 1.4.6, resulting in no net loss of wetland quantity or quality. For that reason, the impact is considered less than significant.” We note that the Clean Water Act (CWA) 404(b)(1) guidelines stress avoidance and minimization of impacts to special aquatic sites, such as wetlands.	Acknowledged. Wetland mitigation measures and avoidance and minimization measures will be further defined during the jurisdictional determination and permitting actions associated with the Proposed Action.	Carrie Traver	EPA
091	026	018	Water Resources	General	Consistent with CWA 404(b)(1), we recommend fully assessing ways to reduce potential direct and indirect impacts to aquatic resources through design, such as shifting alignments or use of retaining walls to reduce fill slope impacts.	Acknowledged. This will be addressed as design progresses and through the wetland permitting process.	Carrie Traver	EPA
092	027	018	Water Resources	Surface Waters & Water Quality	The discussion of streams also concludes that impacts would be less than significant because they would be mitigated. We recommend fully evaluating stream impacts and indicating ways direct, indirect, and cumulative impacts could be avoided or reduced, and what type of mitigation is expected.	Acknowledged. This will be addressed as design progresses and through the wetland permitting process.	Carrie Traver	EPA
093	028	018	Water Resources	Wetlands	While stream and wetland mitigation may offset impacts, future mitigative actions do not address the potential for impacts, nor is it clear how no net loss will be achieved as a mitigation plan has not been provided. It is currently unclear how the loss of forested riparian wetlands would be completely mitigated considering that temporal loss of resources associated with the fill of forested wetlands is likely.	Acknowledged. Temporal loss of forested riparian wetlands will be acknowledged and discussed as a cumulative impact in the SEA. Revised text as follows: "Implementation of Alternative 1, concurrent with proposed developments, would result in temporal loss of forested wetlands in combination with other past, present, and reasonably foreseeable future actions. Impacts from the Proposed Action and other proposed developments would be mitigated in accordance with MDE and USACE requirements and would ultimately result in less than significant temporal loss of forested wetlands, once mitigation is completed." See Section 4.7.1.2. BEP will comply with all state and federal regulations associated with impacts to forests and wetlands. Impacts will be addressed through the permitting process	Carrie Traver	EPA
094	029	018	Water Resources	Surface Waters & Water Quality	Section 4.7 list several parameters for a significant adverse impact to water resources, including an impact that would: “Permanently alter, dam, divert, or redirect more than 200 linear feet of a jurisdictional stream segment; or alter hydrological connections to WUS...” However, the EA lists impacts in area, not linear feet, and the hydrological connections do not appear to be discussed. Inclusion of this information in the EA would be helpful.	Acknowledged. Labeling of water resources was revised for consistency with the Wetlands Report. See Figure 3-11 and Sections 3.6 and 4.7. SEA was updated to include impacts to water resources in linear feet as well as surface area. See Section 4.7.1.1. Added the following clarification regarding surface water impacts: "These impacts are provided as a worst-case estimation of potential impacts, based on a conservative estimation of the project area. It is fully expected that as design progresses. the LOD will become more narrowly defined and resulting impacts avoided or minimized." See Section 4.7.1.1. Added the following clarification regarding WUS-1: "WUS-1 is connected downstream to Indian Creek through a surface hydrologic connection, as observed during field investigations documented in Table 3-2 of the report in Appendix C." See Section 3.6.1.	Carrie Traver	EPA
095	030	018	Water Resources	Wetlands	As the impacted streams and wetlands are connected to each other, maintaining connectivity and avoiding hydrological impacts is an important consideration and should be fully evaluated for both wetlands and streams.	Acknowledged. The following text was added to the SEA, “WUS-1 is connected downstream to Indian Creek through a surface hydrologic connection, as observed during field investigations documented in Table 3-2 of the report in Appendix C.” See Section 3.6.1. BEP will comply with all state and federal regulations associated with impacts to streams and wetlands. Impacts will be addressed through the permitting process.	Carrie Traver	EPA
096	031	018	Biological Resources	Wildlife	Passage for aquatic, semi-aquatic, and terrestrial species should be evaluated and incorporated into the project, where possible. The March 21, 2023 CEQ Guidance for Federal Departments and Agencies on Ecological Connectivity and Wildlife Corridors indicates that federal agencies should promote greater connectivity across a variety of habitats to sustain biodiversity and enable wildlife to adapt to fluctuating environmental conditions. Consistent with the intent of this guidance, we recommend that the EA consider ways to support and improve habitat connectivity such as upgrading road culverts to improve passage for aquatic life and other fauna.	Acknowledged. BEP is conducting floodplain study which will be utilized as design progresses. The floodplain study will not be complete prior to the SEA being completed. Culvert upgrades will also be considered as design progresses. The following text was added to Section 4.8.1.1: "In accordance with the March 21, 2023, CEQ Guidance for Federal Departments and Agencies on Ecological Connectivity and Wildlife Corridors, ecological connectivity and wildlife corridors will be considered as design progresses to the extent practicable."	Carrie Traver	EPA
097	032	018	Water Resources	Surface Waters & Water Quality	Overall, the EA should fully assess impacts to streams and wetland functions and indicate how such impacts may be offset in the watershed to prevent a loss of resource.	The SEA analyzed the potential surface water and wetland impacts as a result of the current limits of disturbances (LOD) associated with the SEA Proposed Action. As the design progresses the LOD will be refined and potentially reduce any current proposed impacts to surface water and wetlands. Any impacts to surface water and wetlands are considered less than significant and would be mitigated according to 404(b)(1) guidelines.	Carrie Traver	EPA

098	033	018	Vegetation	Trees	An estimated 3.92 acres of trees will be removed for Alternative 1, with additional impact expected for Alternative 2. In addition to the habitat associated with the stream and wetlands, the upland forest appears to include both mature trees and mast producing species such as oak and hickory, which are associated with high habitat value.	Acknowledged.	Carrie Traver	EPA
099	034	018	Vegetation	Special Status Species - FIDS	Section 3.7.3 briefly states that the impacted forested areas may provide FIDS habitat. However, 4.8.1.1 does not address potential impacts to FIDS habitat, such as impacts from fragmentation and edge effects. We recommend this be evaluated in the EA.	Language was added to the SEA that includes the potential of impacts to FIDS species from habitat fragmentation and edge effects: "While the Proposed Action could adversely affect FIDS habitat due to increased habitat fragmentation and edge effects, all potential FIDS habitat within the LOD comprises the forest perimeter (within 300 feet of the existing forest edge). As such, the impact of the Proposed Action on FIDS habitat would be minimal as all impacts would be to the existing forest edge. Impacts to potential FIDS habitat would be finalized as design progresses and would be minimized to the extent practicable. Site design measures and mitigation, if required, would adhere to guidelines established by the Critical Area Commission's "Guide to the Conservation of Forest Interior Dwelling Birds in the Chesapeake Bay Critical Area." As such, adverse effects to FIDS habitat are anticipated to be negligible." See Section 4.8.1.1.	Carrie Traver	EPA
100	035	018	Vegetation	Trees	Section 4.8.1 concludes "These trees would be mitigated in a sufficient manner to result in a less than significant impact" to migratory birds. However, where and how such mitigation would occur is unclear. Based on the EA, it is unknown if a Forest Conservation Plan would be developed, and tree replacement is not included in Table C-1. Similar to forested wetlands, temporal loss will occur even if trees are fully replaced. We recommend fully evaluating potential impacts and committing to appropriate mitigation, if necessary.	BEP will comply with state regulations and NCPC requirements for tree replacement. As design progresses, mitigation will be refined.	Carrie Traver	EPA
101	036	018	Vegetation	Trees	The text in 4.8.2.1 should be revised. Lines 2316-2317 states "Impacts to forested habitat would be less than under Alternative 1, at approximately 1.0 acre..." We assume that "less" is an error as this is inconsistent with the other text.	The text is correct as is, because the sewer alignment under Alternative 2 passes through agricultural land on BARC, and would impact up to 1 acre of forested habitat. The alignment for Alternative 1 encompasses forested habitat north of Odell Road, and up to 1.7 acres would be impacted. The preceding sentence states that Alternative 2 may have greater vegetation impacts is because the sewer alignment is longer compared to Alternative 1; however, because the land is agricultural, most impacts would be to grasses and groundcovers.	Carrie Traver	EPA
102	037	018	Vegetation	Invasive Species	Given the currently low percentage of invasive species in Forest Stands 1, 2, 3, and 4 and the colonization and spread of invasive species from the edge effect, we recommend BEP commit to measures to actively control invasive plant species to prevent them from degrading the adjacent forest and wetlands.	Acknowledged. BEP will not have jurisdiction over this property once the project is built. Any invasive species management will occur through USDA BARC, MDT SHA or Prince George's County.	Carrie Traver	EPA
103	038	018	Hazardous & Toxic Materials & Waste	ACM Plan	Additional information could clarify Section 4.16. 4.16.1.1 indicates "Prior to the construction of traffic and utilities mitigation features, asbestos-containing materials (ACM) could be encountered during site preparation..." We recommend explaining the expected potential for encountering ACM and the proximity to residences, as well as any specific measures that would clearly minimize impacts.	Asbestos-cement, or Transite, may have been used in sanitary sewer drain piping or other insulated construction components both above-ground and below, including both residential and commercial applications. MDE recommends wet methods and PPE for removal; however, if the ACM is friable it must be removed by a licensed asbestos contractor. Revised text as follows: "Prior to the construction of traffic and utilities mitigation features, asbestos-containing materials (ACM) could be encountered during site preparation due to the potential presence of asbestos-containing pipe in aging underground utilities (WSSC 2024). Despite their proximity, the potential presence of ACM would not impact residents near the proposed WSSC connection north of Odell Road because asbestos contained in cement is not typically friable and does not impact air quality unless the cement is crushed or pulverized (MDE 2015a). MDE recommends wet methods and personal protective equipment for removal of ACM; however, if the ACM is friable it must be removed by a licensed asbestos contractor (MDE 2015b)." See Section 4.16.1.1.	Carrie Traver	EPA
104	039	018	Hazardous & Toxic Materials & Waste	General	The EA indicates that "Where feasible, the traffic and utilities mitigation Project Area would avoid AOCs with ongoing RAs, and construction would not interfere with NPL actions or investigations." Please clarify where potential impacts to Areas of Concern may occur.	There do not appear to be any active AOCs within the Project Area. The following text was removed "Where feasible, the traffic and utilities mitigation Project Area would avoid AOCs with ongoing RAs, and construction would not interfere with NPL actions or investigations." and updated to state "There are no active AOCs within the Project Area." See Section 4.16.1.1.	Carrie Traver	EPA
105	040	018	General	General	Appendix A includes a number of figures that clarify the activities and impact areas; however, it would be helpful to include many of these figures in the EA with the narrative. Please note that figures and tables do not count toward page limits.	Figures were added to the document as separate pages so that they do not count against page limits	Carrie Traver	EPA
106	001	019	General	General	The relocation and construction of the CPF causes severe impacts to the Beltsville Agricultural Research Center (BARC), the watersheds, and communities, and raises several issues about how the infrastructure around the site is designed.	Details regarding construction and operation of the proposed CPF are not within the scope of this EA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.	Pat Jackman	Maryland Coalition for Responsible Transit
107	002	019	Cumulative Impacts	Transportation	The MCRT is a nonprofit that evaluates transportation projects for social equity, environmental impacts, economic viability, and community accessibility. Why are we responding? You no doubt are aware of the Superconducting Magnetic Levitation Train Project (SCMaglev) and its plan to locate a 180-acre train maintenance facility on the BARC. This would cause severe cumulative impacts from all nonagricultural projects located on the BARC.	The Superconducting Magnetic Levitation Train Project (SCMaglev) website states that the project is on pause as of August 2021. See B-W SCMaglev Project Home Page (baltimorewashingtonscmaglevproject.com). No additional analysis of the SCMaglev project is included in the SEA.	Pat Jackman	Maryland Coalition for Responsible Transit
108	003	019	Cumulative Impacts	General	The MCRT and many environmental groups participated in the comment periods for the CPF and were present at the BEP Draft EA for Traffic and Utilities Mitigation at the May 13, 2024, meeting. We are opposed to the relocation of this facility to the BARC because of the cumulative environmental and community impacts. In an area with limited greenspace, allowing one industrial facility in the BARC could serve as a precedent for other industrial uses.	Acknowledged.	Pat Jackman	Maryland Coalition for Responsible Transit
109	004	019	Transportation	General	The Draft EA tool does not contain enough detail to sufficiently address the extensive environmental impacts. A Supplemental Environmental Impact Statement (EIS) would in-depth address such issues as construction impacts to archeological sites; the increased transportation-caused air quality emissions, related health impacts, and increased use impacts to local roads; climate change impacts with increased rainfall patterns; water quality impacts for Beaver Dam Creek; and wildlife and protected species impacts. A Supplemental EIS could do more to require that the CPF and related traffic and mitigation work are designed to reduce noise impacts and improve bicycle, pedestrian access, and traffic intersection safety. It is anticipated that any roadway impacts incurred during this project would be reconstructed with all Prince George's County master-planned bicycle and pedestrian facilities, as identified in the current Countywide Master Plan of Transportation.	Acknowledged. Pursuant to the National Environmental Policy Act of 1969 (Title 42, United States [U.S.] Code, 30 4321-4370f), as amended; regulations of the Council on Environmental Quality (40 Code of Federal Regulations 1500-1508) BEP has prepared a supplemental EA to evaluate potential environmental effects associated with the implementation of traffic, utility, and construction. These traffic, utility, and construction-related measures were developed to address recommendations from the construction and operation of the replacement CPF, which was analyzed in the Final Environmental Impact Statement (EIS) for the Construction and Operation of a CPF within the National Capital Region (NCR) (Treasury 2021a). The SEA is being completed to determine if there are any significant impacts of the Proposed Action.	Pat Jackman	Maryland Coalition for Responsible Transit

110	005	019	Water Resources	General	Specifically, the protected Beaver Dam Creek (Tier II Waterway) and Anacostia Watershed, and ultimately Chesapeake Bay, will be affected by the construction and stormwater runoff. The USACE still must apply to the Maryland Department of the Environment (MDE) for a Tier II Water Quality Certification (WQC) to prove that the waterways are not at risk of pollution. Prior comments and concerns regarding the use of the BARC systems to filter the CPF waste and release it into Beaver Dam Creek were the reason that the Washington Suburban Sanitary Commission (WSSC) will now process all the water. The EA (Alternatives 1 and 2) described the proposed work to construct the sewer line for the WSSC system to be connected to the Blue Plains Advanced Wastewater Treatment Plant. It is not clear whether all industrial waste produced by the CPF would be pretreated and sent through the sewage lines to the WSSC or whether some of it would be containerized and moved offsite by trucks. Which one is it? Or is it a combination of the two? Of great concern is understanding if the chemicals generated by the CPF processes can be handled directly by the WSSC, an issue never addressed in the original EIS.	All wastewater will be pre-treated on-site and discharged to WSSC infrastructure. BEP will meet effluent limits provided by WSSC through their permitting process. All materials considered hazardous waste will be containerized and shipped off-site.	Pat Jackman	Maryland Coalition for Responsible Transit
111	006	019	Cumulative Impacts	Surface Water & Water Quality	The MCRT is aware that, in 2023, the SCMaglev project sponsor (Baltimore-Washington Rapid Rail) withdrew its application for Tier II WQC because their technical approaches, plans, and documentation were deemed inadequate by the MDE. Will the USACE's application include the cumulative impacts from multiple construction projects planned for the BARC? There are still surrounding waters on the site—eight wetlands, six stream reaches, the two wells east of Poultry Road, and the planned bioswale area. Given that chemicals handling was never properly addressed for the CPF, these water regions are in danger of being polluted, especially the bioswale, as its function is to collect runoff water.	Details regarding construction and operation of the proposed CPF are not within the scope of this SEA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region. Added BARC projects to cumulative impacts analysis, see Table 4-1.	Pat Jackman	Maryland Coalition for Responsible Transit
112	007	019	Cultural Resources	Cultural Resources	The BARC is being evaluated under the category of National Register of Historic Places. Both the BARC and the Baltimore-Washington Parkway are designated as “cultural landscapes.” This is a critical reason the MCRT continues to oppose developing this land for the BEP.	Both BARC and the BW parkway are eligible for the National Register of Historic Places as historic districts. They are also cultural landscapes. Potential impacts to these historic districts from the proposed traffic and utility improvements was considered (see Section 4.9 within this SEA). The Maryland Historical Trust concurred with BEP, USDA, and NPS that the proposed undertaking will have no adverse effect on historic properties via a letter dated April 23, 2024. Details regarding construction and operation of the proposed CPF are not within the scope of this SEA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.	Pat Jackman	Maryland Coalition for Responsible Transit
113	008	019	General	General	The MCRT agrees with and supports the Draft SEA comments made by the City of Greenbelt, the Sierra Club, and Save BARC advocates. The USACE faces a continuing challenge—to justify to the community the reasons for their insistence on locating an industrial project, along with other proposed nonagricultural projects, on the BARC. We feel the best decision to be made is to move the CPF to another part of Prince George's County that is already within a developed industrial area (designated Industrial Employment IE or Industrial Heavy IH by the Maryland-National Capital Park and Planning Commission).	Details regarding construction and operation of the proposed CPF are not within the scope of this SEA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.	Pat Jackman	Maryland Coalition for Responsible Transit
114	001	020	Water Resources	Wetlands	General comment: Any impacts to nontidal wetlands and/or the nontidal wetland buffer should be first avoided and then minimized, and mitigation will be required for any unavoidable permanent impacts to nontidal wetlands over 5,000 square feet.	Acknowledged. This will be addressed as design progresses and through the wetland permitting process.	Danielle Spendiff	MDE
115	002	020	General	General	Page S-2 & 2-2: Please include justification on the need for a 7.5 acre laydown area south of the CBF site, as well as the existing land use of this site.	The laydown area would be used for the CPF construction and other improvements other than off-site roadway improvements, see Section 2.1.1. The current land use of the laydown area is Agricultural. Please refer to Figure 3-1 for a map of land use in the ROI.	Danielle Spendiff	MDE
116	003	020	Water Resources	Stormwater	Page 1-3: A reference is included for the Erosion and Sediment Control Standards and- Specifications but not the Stormwater Manual; both are incorporated by reference in COMAR.	Added a reference to the Stormwater Manual in the table and References section.	Danielle Spendiff	MDE
117	004	020	Water Resources	General	Page 2-3: Bioswales typically run parallel to paved surfaces but one is noted west of the CPF site; it is unclear why access clearing would be needed for the bioswale	The purpose of the cleared bioswale maintenance access is to be able to access and maintain a planned bioswale, see Section 2.1.1.	Danielle Spendiff	MDE
118	005	020	Cumulative Impacts	General	Page 4-4: The MAGLEV project is being proposed by a private entity (Baltimore Washington Rapid Rail). The table indicates that FRA and MDOT are proposing the project.	See comment 107.	Danielle Spendiff	MDE
119	006	020	Water Resources	Floodplains	Page 4-19: If a portion of this project is located in a mapped Federal Emergency Management Agency (FEMA) 100-year floodplain, tidal or nontidal, notification of the appropriate local government and the state National Floodplain Insurance Program (NFIP) coordinator at MDE (Mr. Dave Guignet) of the proposed work and the impacts to the FEMA floodplain is required. If the proposed work/construction activity changes or alters the FEMA 100-year boundaries or elevations, the project proponent is fully responsible for and required to contact FEMA and apply for a Conditional Letter of Map Amendment (CLOMR), which may necessitate a separate hydrologic and hydraulic study (determined by FEMA) before construction, and to complete the FEMA Amendment process with a Letter of Map Amendment or Revision (LOMR) after construction is completed. This includes coordinating and informing the local government/community throughout the process.	The design team is looking at options to completely avoid any impact to the floodplain. If impacts to the floodplain cannot be avoided based on the limits of disturbance that were analyzed in the SEA, the required coordination and additional floodplain impact modeling will be completed in coordination with the required regulatory agencies.	Danielle Spendiff	MDE
120	007	020	Water Resources	Stormwater	Page 4-20, Line 2173: This should be rephrased to negligible impacts to “existing stormwater conveyance systems”.	Revised as recommended.	Danielle Spendiff	MDE
121	008	020	Topography & Soils	Hydrology	Page 4-20, Line 2177: Please identify the underlying hydrologic conditions (D soils or high groundwater?)	The SEA evaluated soils' hydrologic conditions based on the NRCS soil survey for this area. Further geotechnical analysis will be completed as design progresses and is warranted.	Danielle Spendiff	MDE
122	009	020	Water Resources	Stormwater	Page 4-20, Line 2180: Rainwater harvesting and pervious paving are not appropriate for public roadways. LID features are not adequate for addressing State SWM requirements. ESD as well as 10-yr and 100-yr peak management will be required for this project.	Acknowledged. Sentence was updated to state that Proposed Action will meet MDE ESD requirements.	Danielle Spendiff	MDE
123	010	020	Water Resources	Stormwater	Page 7-2: Citation to be added: Maryland Department of the Environment [MDE]. 2009. Maryland Stormwater Design Manual, October 2000, Revised May 2009. Retrieved from: https://mde.maryland.gov/programs/water/StormwaterManagementProgram/Pages/stormwater_design.aspx	Added citation.	Danielle Spendiff	MDE
124	011	020	Water Resources	General	Appendix B, Area C, BW Parkway (multiple areas): Please provide drainage area maps for the project. These are needed in order to provide justification for the use of bioswales to manage the 100-year storm in multiple areas. The determination of whether bioswales are sufficient will be made after drainage maps are made available. (comment applies to Pages B-23, B-37, B-51, B-65, B-79, B-93, B-107, B-121, B-135, & B-149)	Acknowledged. Design is ongoing and this information will be provided to MDE during the permitting process.	Danielle Spendiff	MDE
125	012	020	General	General	Appendix B, Page B-197: Please clarify the meaning of “with existing structures with remaining capacity”	BEP will coordinate with MDE to clarify this comment during the Tier II review process.	Danielle Spendiff	MDE

						Acknowledged. The design team is looking at options to completely avoid any impact to the floodplain. If impacts to the floodplain cannot be avoided based on the limits of disturbance that were analyzed in the SEA, the required coordination and additional floodplain impact modeling will be completed in coordination with the required regulatory agencies.		
126	013	020	Water Resources	Floodplains	Appendix C, Page C-2: FEMA considerations are missing from the “Water Resources” Impact Topic		Danielle Spendiff	MDE
127	014	020	Water Resources	Coastal Zone	Appendix E, Coastal Zone Management Act Federal Consistency Determination: MDE notes that a formal determination regarding consistency with Maryland’s Enforceable Policies will be requested at the time of submission of a Joint Permit Application. Please provide completed Enforceable Policy Checklists to assist with this determination once requested.	Acknowledged.	Danielle Spendiff	MDE
128	001	021	General	General	Rodney Roberts and Mary Ann Canter oppose the U.S. Department of the Treasury’s (“Treasury”) wrongheaded decision to site its new, industrial Currency Production Facility (“Facility” or “CPF”) in the Beltsville Agricultural Research Center (“BARC”), and especially in a primarily agricultural and rural area of the BARC, where it will negatively impact the Maryland public and the environment.	Acknowledged.	Rodney Roberts & Mary Ann Canter	
129	002	021	General	General	We and others in the Greenbelt and Beltsville area continue to object to the proposed placement of the Facility in the BARC. The viewshed following construction would be significantly degraded. Based on the proposed plans, the BARC entrance from Edmonston Road onto Powder Mill Road would lead past stately old buildings and old red brick university-type buildings on a hill to the left and a dairy farm on the right, but at the entrance to the Facility a visitor would see a large, high fence extending behind the old buildings, high security gates, and a very large, very modern, white, rectangular block building. The design of this building is a different architectural style from the buildings next to it, perhaps giving the visitor the feeling that they have just arrived at a very modern prison. The viewshed would be dramatically altered from farmland, field, and forest to modern industrial sprawl. Treasury should never have selected this bucolic location for its Facility. Moreover, the Facility’s modern industrial look and mission would diminish BARC’s integrity as a historic district.	Details regarding construction and operation of the proposed CPF are not within the scope of this EA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.	Rodney Roberts & Mary Ann Canter	
130	003	021	General	General	Before a decision is made to approve the Facility and related traffic and utility mitigation work and before construction begins, Treasury must complete a supplemental environmental impact statement (“EIS”) that fully evaluates environmental impacts. There have been significant changes to the Facility since the final EIS was released, including design and project decisions to reroute wastewater and divert stormwater, which require a supplemental EIS. The public and the decisionmaker should not be forced to consider alternatives based on hidden and/or outdated information. The current decision to supplement the EIS with an EA that addresses only impacts from the proposed utility and traffic mitigation rather than addressing the environmental impacts from the Facility and the utility and traffic mitigation (collectively, “Project”) is misleading to the public and the decisionmaker.	No substantial changes have been made to the Proposed Action to construct and operate the CPF that was evaluated in the EIS. The SEA evaluates the refinement of the traffic mitigation measures that were identified in the EIS and changes made to the proposed utility corridors.	Rodney Roberts & Mary Ann Canter	
131	004	021	General	General	Further, the Draft EA does not include a true no action alternative. Rather, the so-called “no action” alternative in the Draft EA consists of building the Facility but not constructing the traffic mitigation and utilities. This choice is nonsensical because the Facility’s utility connections must connect to something. The Draft EA states that, under the no action alternative, “current sanitary sewer, electric, gas, and telecommunications service lines would not adequately support the new [Facility].” Draft EA at 2-4. The Draft EA should be revised to analyze a “no action” alternative that consists of constructing neither the Facility nor the traffic and utilities mitigation.	Please refer to the EIS and Record of Decision for the no action alternative for the CPF. The SEA no action alternative is based on the utility and traffic improvements for the Proposed Action.	Rodney Roberts & Mary Ann Canter	
132	005	021	General	General	The final EIS (“FEIS”) released in 2021 was deficient. It failed to adequately analyze impacts to environmental justice, air quality, Beaverdam Creek, and traffic, among other impacts. The City of Greenbelt and others identified these flaws in their comments on the draft and final EIS and we refer the Agencies to those thoughtful letters. The Draft EA continues this pattern and fails to sufficiently analyze the environmental impacts of the proposed utility and traffic mitigation or evaluate the cumulative impacts of the Project.	and revised as follows: Water Resources:“Implementation of Alternative 1, concurrent with proposed developments, would result in temporal loss of forested wetlands in combination with other past, present, and reasonably foreseeable future actions. Impacts from the Proposed Action and other proposed developments would be mitigated in accordance with MDE and USACE requirements and would ultimately result in less than significant temporal loss of forested wetlands, once mitigation is completed. Construction of Alternative 1 concurrent with proposed developments, including the overlapping construction period for the CPF and proposed utilities, could increase stormwater runoff in the vicinity; however, adherence to mitigation measures listed in Appendix B would be required to protect water resources during construction. Long-term implementation of Alternative 1 would increase impervious surfaces within the ROI. The additional impervious area would result in a collective increase in stormwater runoff that would cause soil erosion and sedimentation. BEP’s incorporation of stormwater management features and practices into the design would minimize the Proposed Action’s contribution towards adverse cumulative effects. Therefore, the Proposed Action would have a less than significant contribution to cumulative impacts.” See Section 4.7.1.2. Air Quality: “Further, construction of the sewer line extension from Odell Road would occur over a one-month period when the CPF is under construction between approximately 2025 and 2027. The cumulative emissions from constructing the sewer line extension together with those from constructing the CPF would not exceed the de minimis thresholds or change attainment status of criteria pollutants. Construction of the roadway improvements would be completed prior to 2031 when CPF operation is anticipated to begin; therefore, there would be no cumulative emissions from the Proposed Action Alternative 1 and CPF operation.” See Section 4.5.1.2.	Rodney Roberts & Mary Ann Canter	
133	006	021	Air Quality	Emissions	While we appreciate the Draft EA providing estimates of air emissions from construction of the traffic and utilities mitigation proposed alternatives, there remain significant flaws in these estimates that prevent the Agencies from making an informed decision, in violation of the National Environmental Policy Act (“NEPA”).	Acknowledged. Air emission calculations were updated for the SEA Proposed Action based on the latest project schedule for the CPF and the traffic mitigation upgrades, see Tables 4-2 and 4-4. The proposed schedule for constructing the roadway upgrades outlined in the SEA for the Proposed Action does not overlap construction or operation of the CPF; as a result, these activities do not have overlapping emissions. The proposed schedule for the utility extension has a short overlap with the CPF construction and these overlapping emissions have been analyzed in the SEA and do not exceed regulatory thresholds.	Rodney Roberts & Mary Ann Canter	
134	007	021	Air Quality	Emissions	As noted above, the Draft EA problematically addresses air quality impacts from the traffic and utility mitigation work only, when a supplemental EIS for the entire Project is needed. This is particularly problematic for air quality issues that are presented in a segmented and confusing way. For example, the FEIS projected harmful criteria pollutant emissions based on construction of the Facility between 2023 and 2025, with operation to begin in 2026. FEIS at 3-19. This schedule is no longer possible. The Draft EA suggests the Facility will become fully operational in 2031 or 2032, Draft EA at 4-35, which would require Facility construction in 2027 and 2028.	Air emission calculations were updated for the SEA Proposed Action based on the latest project schedule for the CPF and the traffic mitigation upgrades. See Tables 4-2 and 4-4.	Rodney Roberts & Mary Ann Canter	

135	008	021	Air Quality	Emissions	The Draft EA projects additional emissions of these same harmful criteria pollutants from the traffic and utility mitigation work, also in 2027 and 2028. Yet, the FEIS and the Draft EA both stop short of analyzing human health harms from these emissions based on claims that the (separately) estimated annual emissions are below regulatory thresholds. Draft EA at 4-11 to 1-12, 4-14 to 4-16; FEIS Air Quality Technical Memorandum at 12-13, 16. It is irrational at best and misleading at worst to artificially divide and then separately estimate air emissions of the same pollutants that will be released by both aspects of the Project at the same time. Instead, the Agencies must evaluate the health impacts from the combined projected emissions because emissions from the Facility's construction and traffic and utility construction will be occurring simultaneously and harming the local community, including nearby residents and students and teachers at the Vansville Elementary School.	Air emission calculations were updated for the SEA Proposed Action based on the latest project schedule for the CPF and the traffic mitigation upgrades. See Tables 4-2 and 4-4.	Rodney Roberts & Mary Ann Canter	
136	009	021	Air Quality	Emissions	By treating these emissions separately, the Draft EA and FEIS unlawfully obscure the impacts of the combined emissions. For example, the Draft EA estimates 5.063 tons/year of NOx emitted from traffic and utility construction in 2028, Draft EA at 4-16, while the FEIS previously estimated 19.06 tons/year of NOx emitted from Facility construction in 2023, FEIS at 3-19. The NEPA documents do not clarify when these additional air emissions will occur. Treasury must disclose to the public when the Facility construction emissions will be released and how those emissions combined with the emissions from the traffic and utility mitigation work compare to regulatory thresholds.	Air emission calculations were updated for the SEA Proposed Action based on the latest project schedule for the CPF and the traffic mitigation upgrades. See Tables 4-2 and 4-4.	Rodney Roberts & Mary Ann Canter	
137	010	021	Air Quality	Emissions	Regardless, the human health harms from Project emissions, compared to a baseline of not building in that location, must be evaluated. This evaluation is particularly important as NOx is an ozone precursor, and the area is in nonattainment with the National Ambient Air Quality Standard ("NAAQS") for ozone.	See the BEP CPF EIS for evaluation of the no action alternative for not locating the CPF at proposed location. The SEA's no action alternative would not generate emissions above existing levels because the roadway and utility upgrades would not be constructed. Air emission calculations were updated for the SEA Proposed Action based on the latest project schedule for the CPF and the traffic mitigation upgrades.	Rodney Roberts & Mary Ann Canter	
138	011	021	Air Quality	Emissions	A supplemental EIS is further needed to address: Human health impacts from all the increased air emissions, particularly to sensitive and vulnerable populations nearby, including at the nearby Vansville Elementary School. Treasury cannot hide behind compliance (or noncompliance) with the NAAQS to ignore these impacts in the Draft EA and FEIS. The U.S. Environmental Protection Agency ("EPA") has repeatedly explained that impacts from these pollutants are linear, occurring at levels below the NAAQS. See, e.g., Reconsideration of the National Ambient Air Quality Standards for Particulate Matter, 89 Fed. Reg. 16,202 (March 6, 2024) (attached). And there are well-established methods to quantify the costs of additional emissions, which Treasury must utilize or explain why it cannot. See, e.g., id.1 Does Treasury believe that the increased air emissions from the proposed traffic and utility construction, Facility construction, and Facility operation would cause no negative health impacts to nearby populations, including students at the Vansville Elementary School? Such a belief would be mistaken, as the attached document shows. Yet the Draft EA and FEIS conclude there would be less-than-significant adverse impacts from increased air emissions without any discussion of those harms, thus implying those harms would not occur. If that is Treasury's belief, it should be stated explicitly. The public and the decisionmaker have a right to know if the Project would harm local children.	Air emission calculations were updated for the SEA Proposed Action based on the latest project schedule for the CPF and the traffic mitigation upgrades. See Tables 4-2 and 4-4.	Rodney Roberts & Mary Ann Canter	
139	012	021	Air Quality	Emissions	The projections of PM10 emissions from Facility construction and operation must be corrected and combined with PM10 emissions from construction of the traffic and utility mitigation work. The FEIS's PM10 emission projections are projected to be identical or nearly identical to the smaller PM2.5 emissions (projecting that there will be no increase in emissions of particulate matter between 2.5 microns and 10 microns), FEIS at 3-19, 3-20, but this assumption is unsupported. Moreover, the Draft EA estimates the traffic and utilities construction will cause 25 to 34 times more PM10 emissions than the demolition, grading, and construction of the Facility and parking lot, despite the scale of the work being smaller. Compare id. with Draft EA at 4-14 and 4-15. The Facility's PM2.5 and PM10 emissions must be revaluated and combined with the traffic and utility mitigation emissions, and the human health impacts of those total emissions also must be explicitly evaluated.	Air emission calculations were updated for the SEA Proposed Action based on the latest project schedule for the CPF and the traffic mitigation upgrades. Additionally, the PM10 and PM2.5 emissions for the Proposed Action were originally estimated using a model that assumed the Proposed Action total area to be graded during construction (approximately 10 acres) would remain exposed for the entire duration of construction (approximately 21 months). The model was corrected by using the equivalent acres per day to calculate the estimated PM10 and PM2.5 emissions during grading, consistent with the EIS. The updated PM10 and PM2.5 emissions are below 1.5 tons per year for constructions activities for the Proposed Action outlined in the SEA. The updated emissions estimates are presented in Table 4-2 and 4.4.	Rodney Roberts & Mary Ann Canter	
140	013	021	Air Quality	Emissions	Treasury must explain the basis for dividing the proposed 10-month road construction period between late 2027 and early 2028. Road construction typically starts in the spring. The artificial division of construction emissions into two calendar years conceals impacts from the construction that would be evident if it were considered over one year.	Air emission calculations were updated for the SEA Proposed Action based on the latest project schedule for the CPF and the traffic mitigation upgrades. Additionally, the PM10 and PM2.5 emissions for the Proposed Action were originally estimated using a model that assumed the Proposed Action total area to be graded during construction (approximately 10 acres) would remain exposed for the entire duration of construction (approximately 21 months). The model was corrected by using the equivalent acres per day to calculate the estimated PM10 and PM2.5 emissions during grading, consistent with the EIS. The updated PM10 and PM2.5 emissions are below 1.5 tons per year for constructions activities for the Proposed Action outlined in the SEA. The updated emissions estimates are presented in Table 4-2 and 4.4.	Rodney Roberts & Mary Ann Canter	
141	014	021	Air Quality	Emissions	The final EA should include updated ambient air monitoring station measurements from nearby monitors, compared to the NAAQS, for 2023, as the FEIS did for 2019. See FEIS Air Quality Technical Memorandum at 8. It is not useful to rely on five-year-old data.	Air emission calculations were updated for the SEA Proposed Action based on the latest project schedule for the CPF and the traffic mitigation upgrades. Additionally, the PM10 and PM2.5 emissions for the Proposed Action were originally estimated using a model that assumed the Proposed Action total area to be graded during construction (approximately 10 acres) would remain exposed for the entire duration of construction (approximately 21 months). The model was corrected by using the equivalent acres per day to calculate the estimated PM10 and PM2.5 emissions during grading, consistent with the EIS. The updated PM10 and PM2.5 emissions are below 1.5 tons per year for constructions activities for the Proposed Action outlined in the SEA. The updated emissions estimates are presented in Table 4-2 and 4.4.	Rodney Roberts & Mary Ann Canter	
142	015	021	Air Quality	Emissions	Treasury must also consider how the increased air emissions will exacerbate human health harms from recent and expected-to-continue harmful air quality caused by wildfires.	Acknowledged. It is reasonable to expect that MDE would announce a human health advisory should it be necessitated by a future wildfire. Should MDE announce a human health advisory due to a wildfire impacting USDA BARC, then the roadway and utility construction activities for the Proposed Action outlined in SEA could temporary cease until MDE lifts the advisory. As a result, estimated emissions from the Proposed Action would not cause MDE to issue a health advisory associated with a wildfire.	Rodney Roberts & Mary Ann Canter	
143	016	021	Air Quality	Emissions	While the Draft EA claims there is a less than significant cumulative air quality impact, it is not possible to make such a determination without evaluating the above issues. How can Treasury know the cumulative air impacts when it has not looked at the full Project's air emissions?	The schedule for construction and operation of the CPF has been updated since the EIS was completed. The SEA includes updated emissions estimates based on the updated schedule. The proposed schedule for constructing the roadway upgrades outlined in the SEA for the Proposed Action does not overlap construction or operation of the CPF; as a result, these activities do not have overlapping emissions. The proposed schedule for the utility extension has a short overlap with the CPF construction and these overlapping emissions have been analyzed in the SEA and do not exceed regulatory thresholds that would otherwise warrant further analysis. The Proposed Action emissions do not increase above a regulatory threshold when considered on a cumulative basis with other projects analyzed in the SEA.	Rodney Roberts & Mary Ann Canter	

144	017	021	Climate Change & Greenhouse Gas	General	In its scoping comments on the Draft EA, the EPA noted that the Council on Environmental Quality (“CEQ”) released climate change guidance in 2023 that encourages agencies to properly address and quantify greenhouse gas emissions. See Draft EA at B-190. This guidance requires agencies to evaluate climate impacts in their NEPA analyses and evaluate them from a local, regional, and statewide perspective, rather than dismissing them as globally insignificant. The CEQ Guidance calls agency statements that impacts of a project are insignificant on a global scale “not useful.” The Corps should follow CEQ guidance when addressing climate change impacts.	Climate Change and Greenhouse Gas impacts were addressed in the Draft SEA using in Air Conformity Applicability Model (ACAM) GHG SCC model per 32 CFR Part 989 and is consistent with EPA methodology. While estimated project-related GHG emissions can be quantified, the direct impacts of such emissions on global climate change cannot be determined based on available science. There is no evidence that would indicate that the emissions from a project the size of the Proposed Action would directly or indirectly affect the global climate, other than contributing to cumulative GHG emissions.	Rodney Roberts & Mary Ann Canter	
145	018	021	Climate Change & Greenhouse Gas	Process	We appreciate the Draft EA’s estimated quantification of the costs of additional GHG emissions from the traffic and utility construction (~\$114,000). Draft EA at 4-17 and 4-18. However, the Agencies should use the costs from EPA’s Report on the Social Cost of Greenhouse Gases: Estimate Incorporating Recent Scientific Advances, or explain why it choose not to incorporate the best available information. Importantly, quantifying the costs for this small portion of the Project, while refusing to do so in the FEIS for construction and operation of the Facility, presents a misleading picture and lacks any justification. Before moving forward, Treasury must quantify the costs associated with the Project’s greenhouse gas (and other air) emissions and use the latest cost figures. If the public and the decisionmaker knew the actual impact of these combined emissions, they might not wish to move forward with the Project.	Climate Change and Greenhouse Gas impacts were addressed in the Draft SEA using the Air Conformity Applicability Model (ACAM) GHG SCC model using methodology in "Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide Interim Estimates under Executive Order 13990," released by the Interagency Working Group on Social Cost of Greenhouse Gases (IWG SC GHGs) in February 2021 and is consistent with EPA methodology.	Rodney Roberts & Mary Ann Canter	
146	019	021	Climate Change & Greenhouse Gas	General	In addition, in its guidance, CEQ encourages agencies to evaluate estimates of greenhouse gas emissions and “ensure[e] that proposed actions and alternatives consider appropriate resilience measures, environmental justice issues, and existing State, Tribal, or local adaptation plans.” Yet, the Draft EA does not discuss how the proposed actions address anticipated increases in precipitation due to climate change nor discuss whether local adaptation plans may be adversely impacted by the proposed increases in impervious surfaces.	The design for stormwater management complies with MDE’s requirements as outlined below: - Stormwater Management The project will be analyzed with the latest state and federal regulations as it relates to rainfall intensity data. The latest update data was the “NOAA Atlas 14” which is historical precipitation data that follows the most recent recorded rainfall patterns in the area. The stormwater management facilities will be designed to manage the mandated rainfall intensities per the Atlas 14 data. - Stormwater management -10 year quantity control: The 10-year and 100-year post-development peak discharges will be designed to be below the respective pre-development (i.e., current existing conditions) peak discharge flow rates, as required by MDE. The project will meet MDE’s quantity management requirement.	Rodney Roberts & Mary Ann Canter	
147	020	021	Utilities	Wastewater	The Draft EA contains no analysis of water quality impacts from the Project’s wastewater discharges, despite a significant change in the Project since the FEIS: the Agencies now propose to discharge 120,000 gallons per day of wastewater through the Blue Plains Wastewater Treatment Plant (“WWTP”) and then to the Potomac River. See, e.g., Draft EA at S-2. While we wish to make clear that we appreciate this change because it lessens harm to Beaverdam Creek, both by avoiding the non-compliant BARC WWTP and by routing the Facility’s wastewater discharge elsewhere, we nevertheless believe the Agencies must analyze the water quality impacts of this revised plan so that they have a concrete basis for their decision to make this change.	At this time, the BEP is in discussions with WSSC to develop constituent discharge standards that will be part of a WSSC issued System Discharge Permit. BEP will install an in-house industrial wastewater treatment system that meets or exceeds all WSSC discharge standards. As the WSSC constituent discharge standards are unknown at this time, a more detailed quality analysis cannot be accomplished at this time.	Rodney Roberts & Mary Ann Canter	
148	021	021	Utilities	Wastewater	The FEIS evaluated the water quality impacts of the Project’s planned discharge of wastewater to the BARC East WWTP and then to Beaverdam Creek. FEIS at 3-35 to 3-36. Based on the assumption the Facility would use the BARC East WWTP, the FEIS concluded that there would be a less-than-significant adverse impact on surface water flow from wastewater discharge. FEIS at 3-37. While that evaluation was insufficient and the conclusion incorrect, now that Treasury has changed its plans, that evaluation and conclusion no longer describe the Project’s environmental impacts. Neither the FEIS nor the Draft EA contain any evaluation or conclusion about the water quality impacts of the Project from discharges through the Blue Plains WWTP. And it is not possible for Treasury to make a finding of no significant impact to water quality from the Facility’s wastewater discharges without having done any analysis of those discharges. A supplemental EIS that addresses these impacts must be released for public review and comment before a decision is made or construction begins.	At this time, the BEP is in discussions with WSSC to develop constituent discharge standards that will be part of a WSSC issued System Discharge Permit. BEP will install an in-house industrial wastewater treatment system that meets or exceeds all WSSC discharge standards. As the WSSC constituent discharge standards are unknown at this time, a more detailed quality analysis cannot be accomplished at this time.	Rodney Roberts & Mary Ann Canter	
149	022	021	Utilities	Wastewater	The Draft EA claims that discharging wastewater to the BARC East WWTP was screened from further analysis during design progression based on that WWTP’s non-compliance status and public concern for local water quality. What does “during design progression” mean? The final EA should be more specific. When did Treasury become aware of this non-compliance and public concern? Why was BARC East the only wastewater alternative evaluated in the FEIS?	“During design progression” is a statement made to summarize the design process, where licensed architects and engineers design the best solution to meet requirements. During this process, agency and stakeholder engagements occur to better understand existing conditions and appropriate proposed design options. During one of these engagement meetings to discuss permitting actions with MDE, Treasury became aware of BARC’s WWTP non-compliance. The BARC WWTP was the only wastewater alternative evaluated in the FEIS because Treasury was given no indication during pre-planning utility studies that BARC’s WWTP was in non-compliance. Treasury’s intent was to route wastewater to the BARC WWTP due to efficiencies of operations gained when multiple Federal Agencies work together.	Rodney Roberts & Mary Ann Canter	
150	023	021	Utilities	Wastewater	Presumably, Treasury is also aware of compliance issues at the Blue Plains WWTP. See Blue Plains Wastewater Treatment Plan Detailed Facility Report, https://echo.epa.gov/detailed-facility-report?fid=110029030144 (attached) (documenting Clean Water Act violations during eight of the last 12 quarters, as well as Clean Air Act and Resource Conservation and Recovery Act violations). Puzzlingly, those issues are not disclosed in the Draft EA. Public concern for local water quality remains high regarding the Potomac River, Anacostia River, and Chesapeake Bay, waters that have improved dramatically in recent years through the efforts of many individuals and entities but waters that are still in need of improvement. Treasury must evaluate whether its increased and changed wastewater discharge through the Blue Plains WWTP will impact that facility’s ability to comply with the Clean Water Act. And that evaluation must include consideration that the Blue Plains WWTP is operating on an expired but stayed Clean Water Act permit and will need a new permit that will likely come with more stringent limits.	As stated in the SEA, BEP would pre-treat all industrial wastewater to WSSC standards in-house prior to discharge into the WSSC system.	Rodney Roberts & Mary Ann Canter	
151	024	021	Utilities	Wastewater	While the Draft EA implies that the Blue Plains WWTP has the capacity to handle the additional wastewater from the Facility, Draft EA at 3-22, the Draft EA includes no evaluation of the capacity of the existing sewer mains nearby and the sewers used to convey the Facility’s projected additional 120,000 gallons per day of wastewater for approximately seventeen miles. It also does not disclose any impacts to other sewer users. It does not address whether the sewers are separated from stormwater conveyances or whether there is a chance the Facility’s wastewater will be combined with stormwater, leading to potential overflows.	WSSC has identified the acceptable connections points into their system. These connection points were the basis for the sewer alternatives evaluated in the SEA.	Rodney Roberts & Mary Ann Canter	

					<p>The Draft EA at various points states that the Blue Plains WWTP is the WWTP used by Treasury’s existing facility in Washington, DC. See, e.g., Draft EA at 2-2. To the extent the Agencies believe this excuses evaluation of water quality impacts, such a belief is mistaken. A proper evaluation in a supplemental EIS must consider how much wastewater is currently being discharged versus how much will be discharged with the new Facility, what the composition of the wastewater will be (given the different processes that will be used), what path the wastewater takes to get to the WWTP, etc. If there are truly no differences, the Agencies should say so. Moreover, has the current Washington, DC currency production facility had any noncompliance issues with its pretreatment permit? Regardless, this information needs to be evaluated in a supplemental EIS.</p>	<p>At this time, the BEP is in discussions with WSSC to develop constituent discharge standards that will be part of a WSSC issued System Discharge Permit. BEP will install an in-house industrial wastewater treatment system that meets or exceeds all WSSC discharge standards. As the WSSC constituent discharge standards are unknown at this time, a more detailed quality analysis cannot be accomplished at this time.</p>	<p>Rodney Roberts & Mary Ann Canter</p>	
153	026	021	Utilities	Wastewater	<p>The Draft EA states Treasury will pre-treat industrial wastewater to WSSC standards in-house prior to discharge into the sewer system. Draft EA at S-2. Yet there is no evaluation or discussion of what those standards are, how they will be met, what will be removed from the wastewater, what will remain, and what Treasury would do with the extracted (potentially toxic) waste from the wastewater.</p>	<p>As stated in the SEA, BEP would pre-treat all industrial wastewater to WSSC standards in-house prior to discharge into the WSSC system. BEP and WSSC are still coordinating to identify the required pre-treatment standards</p>	<p>Rodney Roberts & Mary Ann Canter</p>	
154	027	021	Utilities	Wastewater	<p>These deficiencies require that Treasury not move forward with the Project without a new water quality analysis.</p>	<p>As stated in the SEA, BEP would pre-treat all industrial wastewater to WSSC standards in-house prior to discharge into the WSSC system.</p>	<p>Rodney Roberts & Mary Ann Canter</p>	
155	028	021	Federal & State Listed Species	Bats	<p>Several federally and state protected bats live in Prince George’s County, including in and near the proposed Facility. In surveys conducted in June 2019 for the proposed Facility, a research wildlife biologist detected four bat species on the site: big brown, eastern red, hoary, and the tricolored bat.</p>	<p>Acknowledged.</p>	<p>Rodney Roberts & Mary Ann Canter</p>	
156	029	021	Federal & State Listed Species	Bats	<p>The Northern Long-Eared Bat is already listed under the Endangered Species Act (“ESA”) as federally endangered, and the tri-colored bat (<i>Perimyotis subflavus</i>) is proposed to be listed as a federally listed endangered species based on widespread threats to the species. Regardless of their differing listing status both of these bats need protection.⁸ The U.S. Fish and Wildlife Service (“FWS”) identified forest removal as negatively affecting the tri-colored bat and “mortality resulting from the loss of summer roosting and foraging habitat, winter hibernacula, or both may compound the impacts from [white nose syndrome].”⁹ In addition, FWS has noted that bats can emerge early from their winter hibernacula because of hibernacula disturbance or from impacts of white nose syndrome, <i>Pseudogymnauscas destructans</i>, and such early emergency can pose particular risks to the bats.</p>	<p>Acknowledged. BEP will recoordinate with USFWS if there are changes to guidance or uplisting of species.</p>	<p>Rodney Roberts & Mary Ann Canter</p>	
157	030	021	Federal & State Listed Species	Bats	<p>While the tri-colored bat is not yet federally listed as an endangered species under the ESA, FWS recently issued voluntary consultation guidance for the tri-colored bat, https://www.fws.gov/species/tricolored-bat-perimyotis-subflavus, suggesting that a decision to protect the tri-colored bat –already long overdue–is imminent. To ensure that these bats are not adversely impacted by the Project, Treasury and the Corps should ensure that their proposed plans are consistent with new guidance on impacts to bats.</p>	<p>Acknowledged. BEP will recoordinate with USFWS if there are changes to guidance or uplisting of species.</p>	<p>Rodney Roberts & Mary Ann Canter</p>	
158	031	021	Federal & State Listed Species	Bats	<p>According to the Draft EA, the Agencies consulted with FWS on the proposed traffic mitigation and utilities work on January 23, 2024, before FWS issued its voluntary guidance. While FWS addressed impacts to the Northern Long Eared Bat, it concluded that the activities as proposed were “not likely to adversely affect” that bat because “tree removal is minimal (3.92 acres of trees will be removed) and no maternity roosts or hibernacula are present within the project area.” See Draft EA at App’x B, at B-1-B-2.</p>	<p>Acknowledged. The April 8, 2024 guidance from USFWS extended the Interim Consultation Framework and Standing Analysis for the NLEB through November 30, 2024. BEP will continue to comply with USFWS requirements regarding the bat species.</p>	<p>Rodney Roberts & Mary Ann Canter</p>	
159	032	021	Federal & State Listed Species	Bats	<p>This letter did not address impacts to the tri-colored bat. FWS’s failure to list the tri-colored bat by the ESA statutory deadline should not be compounded by a decision to approve the overall Project despite anticipated impacts to bats. In FWS’s voluntary guidance, the recommended conservation measures include avoiding impacts to suitable roost trees proximate to an acoustic location of a tri-colored bat during winter months when they are hibernating and during the pup season. The pup season for both the Northern Long Eared Bat and the tri-colored bat is May 15 – July 31 in Maryland. The Corps should not undertake the proposed 3.92 acres of tree removal until the tri-colored bat’s status under the ESA has been determined and, if it is listed as a federal endangered species, the Corps must comply with FWS’s guidance and avoid critical tree removal. In the Draft EA, the Corps has stated that “[a]ny tree clearing would occur outside the active season for both the NLEB and tricolored bat,” Draft EA at 4-22, C-2 (describing mitigation measures including avoid tree removal from April 1 through November 14). These statements should be reviewed to ensure they are consistent with any updated FWS guidance released this summer and, if consistent, those conditions must be made mandatory in any decision document for the Project.</p>	<p>Acknowledged. BEP will recoordinate with USFWS if there are changes to guidance or uplisting of species.</p>	<p>Rodney Roberts & Mary Ann Canter</p>	
160	033	021	Federal & State Listed Species	Bats	<p>The Draft EA must also evaluate the Project’s impacts to bats from lighting. The Corps’ responses to the FWS’s questions for its Information for Planning and Consultation acknowledge that the proposed actions described in the Draft EA will include lighting choices that could impact federally protected bats. For example, the Corps responded “yes” to the question of whether the action “include[s], or is it reasonably certain to cause, the use of artificial lighting within 1000 feet of suitable northern long-eared bat roosting habitat?” and “no” to the question of whether bat-protective lighting would be used. Draft EA at App’x F at F-8. However, the Draft EA does not consider adverse impacts to bats from these choices. It also does not address overall lighting impacts from the Project. Instead, the Draft EA glosses over bat impacts by deferring to the FWS’s conclusion that the traffic and utilities mitigation work would not be likely to adversely affect the NLEB, without fully discussing proposed impacts to the bat (and not addressing the tri-colored bat) nor including impacts from lighting. Impacts from lighting choices must be addressed and appropriately minimized.</p>	<p>Lighting impacts were evaluated on the CPF in the FEIS. All lighting impacts associated with roadway improvements and utility corridors would be temporary and only during construction.</p>	<p>Rodney Roberts & Mary Ann Canter</p>	

161	034	021	Water Resources	Stormwater	The Agencies must fully analyze impacts to Beaverdam Creek from increased impervious surface and runoff during construction and after Project completion. Although the Draft EA states that Treasury would wait until substantial completion of the new Facility to begin roadway improvements, the roadway improvements are planned to be completed prior to the new Facility becoming fully operational in 2031 or 2032. Draft EA at 4-35. This timing means that the Draft EA should have analyzed stormwater impacts from ongoing construction of the Facility together with the construction impacts from the traffic and utilities mitigation work.	The cumulative impact analysis for water resources in the SEA has been modified to address the latest construction period: "Construction of Alternative 1 concurrent with proposed developments, including the overlapping construction period for the CPF and proposed utilities, could increase stormwater runoff in the vicinity; however, adherence to mitigation measures listed in Appendix B would be required to protect water resources during construction. Long-term implementation of Alternative 1 would increase impervious surfaces within the ROI. The additional impervious area would result in a collective increase in stormwater runoff that would cause soil erosion and sedimentation. BEP's incorporation of stormwater management features and practices into the design would minimize the Proposed Action's contribution towards adverse cumulative effects." See Sections 4.7.1.2 and 4.7.2.2.	Rodney Roberts & Mary Ann Canter	
162	035	021	Water Resources	Surface Water & Water Quality	The Agencies must also carefully analyze whether Beaverdam Creek has assimilative capacity to absorb additional pollutants and impacts from the work proposed in the Draft EA.14 Available sampling data from the Maryland Biological Stream Survey shows that Beaverdam Creek may already be significantly degraded (with measured index of biological integrity scores well below the 3.00 threshold), suggesting that Beaverdam Creek has no assimilative capacity to absorb additional pollutants or impacts. Based on this data, Maryland Department of the Environment should deny any forthcoming water quality certification application to prevent further degradation of an already impacted Tier II watershed.	Acknowledged. A Tier II review Antidegradation Review by MDE will occur.	Rodney Roberts & Mary Ann Canter	
163	036	021	Water Resources	General	The Draft EA proposes at least minor widening of Kenilworth/Edmonston Road to address some of the seven intersections proposed for improvements. See, e.g., Draft EA at 4-19, 4-31, and Project Overview Map (Draft EA at PDF 656). This road is currently a local road used by Beltsville and Greenbelt residents and should not be transformed into a feeder road for the Interstate System. The City of Greenbelt has already stated its opposition to any street widening, particularly on Edmonston Road. See FEIS at 9-112 (summarizing the City's comments). In addition, portions of Edmonston/Kenilworth Road lie within a floodplain, Draft EA at 4-20, and so impacts from widening must be reduced to avoid creating adverse stormwater impacts, particularly given the changing rainfall patterns noted below.	Acknowledged. The design team is looking at options to completely avoid any impact to the floodplain. If impacts to the floodplain cannot be avoided based on the limits of disturbance that were analyzed in the SEA, the required coordination and additional floodplain impact modeling will be completed in coordination with the required regulatory agencies.	Rodney Roberts & Mary Ann Canter	
164	037	021	Cumulative Impacts	Process	Finally, any potential widening of Kenilworth Road must be carefully analyzed cumulatively with the National Capital Region Transportation Planning Board's proposal to widen the Kenilworth/Edmonston Road to four lanes from the Beltway to the Intercounty Connector.15 See Draft EA at 4-5 (describing the proposed widening).	Acknowledged. The cumulative impacts from this NCR TPB were analyzed in the EIS and in the SEA in Table 4-1, project number 12. No revisions are warranted.	Rodney Roberts & Mary Ann Canter	
165	038	021	Water Resources	Wetlands	We urge the Agencies to reduce wetland impacts and impacts to trees. Like EPA, we agree that where impacts cannot be avoided the Agencies must assess the impacted wetlands' functions to prioritize avoidance and to assess appropriate mitigation. See Draft EA at B-189 (EPA scoping comments). The plans for the Facility already include proposed destruction of wetlands. The traffic and utilities mitigation designs should aim to avoid further wetland impacts and to mitigate them fully.	Acknowledged. BEP is committed to avoidance of impacts to trees and wetlands where possible. Where impacts cannot be avoided, BEP will coordinate as required with regulatory agencies to implement required mitigation.	Rodney Roberts & Mary Ann Canter	
166	039	021	Vegetation	General	In the Draft EA, the Agencies propose some measures to mitigate the negative effects of building the 1,000,000 square foot Facility in the BARC, yet major problems remain. Building a Facility that takes up over 100 acres would involve the destruction of farmland designated as being of statewide importance, destruction of forest with over 100 specimen trees, and habitat loss. The Draft EA analyzes utilities and traffic mitigation projects that would lead to additional forest cover removal and possibly impact an additional 18 specimen trees in the areas proposed for traffic mitigation. See Forest Stand Delineation App'x C (Specimen Tree List) which is included in the Draft EA App'x D (Wetland Delineation and Forest Stand Delineation Reports). We urge the Corps to retain specimen trees to the maximum extent possible, particularly those which are in good condition.	Acknowledged. BEP will comply with the FCA and NCP's tree mitigation requirement.	Rodney Roberts & Mary Ann Canter	
167	040	021	Water Resources	Floodplains	The Agencies must also consider the impacts of the Project together with possible impacts on flooding from increasing impervious surface, especially given anticipated increased heavy rainfalls due to regional climactic shifts. Instead, in the Draft EA the Agencies only analyze areas that are categorized as floodplains and potential impacts based on floodplain designations that are based on historic rainfall patterns and not predictive of future Maryland rainfall patterns or future flood (and water contamination) risk. See, e.g., Draft EA at 3-8 (describing FEMA floodplains which are based on historical data); 4-19 – 4-20 (describing floodplain conversion to pavement and impacts to stormwater). Maryland rainfall patterns of the past several years have exacerbated impacts to water quality from stormwater runoff and those realities must be fully addressed in the final EA and in updated floodplain maps.	The design for stormwater management would comply with MDE's requirements as outlined below: -Stormwater Management The project will be analyzed with the latest state and federal regulations as it relates to rainfall intensity data. The latest update data was the "NOAA Atlas 14" which is historical precipitation data that follows the most recent recorded rainfall patterns in the area. The stormwater management facilities will be designed to manage the mandated rainfall intensities per the Atlas 14 data. -Stormwater management -10 year quantity control: The 10-year and 100-year post-development peak discharges will be designed to be below the respective pre-development (i.e., current existing conditions) peak discharge flow rates, as required by MDE. The project will meet MDE's quantity management requirement. Revised SEA as follows: "Furthermore, the project will be analyzed with the latest state and federal regulations as it relates to rainfall intensity data. The latest update data was the "NOAA Atlas 14" which is historical precipitation data that follows the most recent recorded rainfall patterns in the area. The stormwater management facilities will be designed to manage the mandated rainfall intensities per the Atlas 14 data. The 10-year and 100-year post-development peak discharges will be designed to be below the respective pre-development (i.e., current existing conditions) peak discharge flow rates, as required by MDE. The project will meet MDE's quantity management requirement." See Section 4.7.1.1.	Rodney Roberts & Mary Ann Canter	
168	041	021	Water Resources	General	Additionally, the Agencies must strive to use the most up-to-date traffic data, including understanding changed traffic patterns post-2020, to ensure that environmental impacts are minimized, including reducing the amount of additional impervious surface from the Project.	Acknowledged.	Rodney Roberts & Mary Ann Canter	
169	042	021	Transportation	General	Finally, the Draft EA includes no discussion of the estimated 45,000 visitors that are expected to visit the CPF each year. The draft EA does not explain how the previously planned 30 parking spaces for visitors would be sufficient to accommodate the 100+ visitors anticipated each day or how those visitors would impact traffic volume.	Details regarding construction and operation of the proposed CPF are not within the scope of this EA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.	Rodney Roberts & Mary Ann Canter	
170	043	021	Cumulative Impacts	General	In the Draft EA there are so many instances when proposed activity is described as having "insignificant impact" or "too trivial or minor" or indirect impact. However, the cumulative impact of all these so-called minor impacts will be damaging to the BARC and surrounding communities and must be fully analyzed together with the additional impacts described above.	BEP revisited the cumulative impact section of the SEA.	Rodney Roberts & Mary Ann Canter	

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180	008	022	Air Quality	Emissions	As others have noted the EIS's PM10 emission projections are projected to be identical or nearly identical to the smaller PM2.5 emissions, EIS at 3-19, 3-20, but this assumption is unsupported. Moreover, the Draft EA estimates the traffic and utilities construction will cause 25 to 34 times more PM10 emissions than the demolition, grading, and construction of the Facility and parking lot, despite the scale of the work being smaller. Compare id. with Draft EA at 4-14 and 4-15. The Facility's PM2.5 and PM10 emissions must be revaluated and combined with the traffic and utility mitigation emissions, and the human health impacts of those total emissions must be evaluated.	The PM10 and PM2.5 emissions for the Proposed Action were originally estimated using a model that assumed the Proposed Action total area to be graded during construction (approximately 10 acres) would remain exposed for the entire duration of construction (approximately 21 months). The model was corrected by using the equivalent acres per day to calculate the estimated PM10 and PM2.5 emissions during grading, consistent with the EIS. Additionally, emissions estimates in the SEA for the Proposed Action have been updated to reflect the schedule and Proposed Action project elements.	Paula Posas	MD Chapter of the Sierra Club
181	009	022	Air Quality	Emissions	The final EA (or as noted above, final supplemental EIS) should include updated ambient air monitoring station measurements from nearby monitors for 2023, compared to the NAAQS, see FEIS Air Quality Technical Memorandum at 8, and also disclose what health impacts could be expected at those concentrations.	The SEA includes available updated ambient air monitoring station measurements from nearby monitors for 2023, compared to the NAAQS.	Paula Posas	MD Chapter of the Sierra Club
182	010	022	Air Quality	Emissions	The final EA must include anticipated air quality impacts together with the proposed CPF's air quality impacts.	The phasing of the roadway construction does not overlap the CPF construction or operation phases; as a result, these activities do not have overlapping emissions. The proposed schedule for the utility extension has a short overlap with the CPF construction and these overlapping emissions have been analyzed in the SEA and do not exceed regulatory thresholds. Impacts from emissions estimated for the Proposed Action outlined in the SEA are presented in Section 4.5.	Paula Posas	MD Chapter of the Sierra Club
183	011	022	Cumulative Impacts	Emissions	While the draft EA claims there is a less than significant cumulative air quality impact, it is not possible to make such a determination without evaluating the above issues. The Corps has not disclosed the cumulative air impacts because it has not looked at the full air emissions.	The phasing of the roadway construction does not overlap the CPF construction or operation phases; as a result, these activities do not have overlapping emissions. The proposed schedule for the utility extension has a short overlap with the CPF construction and these overlapping emissions have been analyzed in the SEA and do not exceed regulatory thresholds. Impacts from emissions estimated for the Proposed Action outlined in the SEA are presented in Section 4.5.	Paula Posas	MD Chapter of the Sierra Club
184	012	022	Climate Change & Greenhouse Gas	Emissions	Council on Environmental Quality ("CEQ") climate change guidance encourages agencies to properly address and quantify greenhouse gas emissions. The Corps should follow this guidance. The Corps should likewise quantify the costs of total greenhouse gas emissions from the combined CPF and traffic and utilities mitigation work based on EPA's Report on the Social Cost of Greenhouse Gases: Estimate Incorporating Recent Scientific Advances. Those costs should be shared with the public and decisionmakers and taken into account in decision making.	Social Cost of Carbon [Greenhouse Gas] was included in the SEA for the traffic and utilities improvements, but not the CPF. CEQ Climate Change guidance for Social Cost of Greenhouse Gases came out after the ROD was signed for the CPF. The Air Coformity Applicability Model (ACAM) method followed EPA guidance.	Paula Posas	MD Chapter of the Sierra Club
185	013	022	Transportation	General	Moreover, the Corps must evaluate the impacts of the CPF and the traffic and utilities mitigation work compared to existing State, Tribal, or local adaptation plans. For example, as part of its plans to reduce greenhouse gas emissions, Maryland Department of Transportation is updating its bicycle and pedestrian master plan, and that plan must be considered when proposing changes to roadways. Similarly, the EIS and Draft EA should, but do not, discuss how local adaptation plans may be adversely impacted by the proposed increases in impervious surfaces.	MDOT SHA reviewed an earlier version of the Draft SEA and provided comments. See Appendix M. BEP will be a new neighbor in the community and would coordinate and support State and local bicycle and pedestrian plans where able.	Paula Posas	MD Chapter of the Sierra Club
186	014	022	General	General	In April 2024, the federal government issued a final rule on building energy performance for federal buildings. The current federal standards for building energy performance require buildings to be designed in 2025 to have a 90% reduction in fossil fuel-generated energy consumption compared to a similar building in 2003. This also is consistent with the State of Maryland's plans to phase out fossil fuel use in large buildings over 35,000 sq ft and have them achieve net zero direct emissions by 2040. Although the proposed CPF is not covered by the state's building energy performance standards, the Corps and Treasury should ensure that the proposed CPF serves as a model for Maryland and is designed in consideration of federal and state standards, to reduce its energy consumption and its climate footprint.	Details regarding construction and operation of the proposed CPF are not within the scope of this EA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.	Paula Posas	MD Chapter of the Sierra Club
187	015	022	Transportation	General	In addition, the Corps and Treasury should commit to providing electric car charging stations at the CPF parking lot to encourage further electrification in addition to the 16 stalls proposed in materials made available by the National Capital Planning Commission in October 2023. Maryland has a goal to develop electric vehicle (EV) "alternative fuel corridors," by placing two public charging stations capable of charging four EVs simultaneously no more than 50 miles apart. The CPF should help Maryland exceed this goal by either creating public charging stations outside the security perimeter of the CPF or by subsidizing public EV charging stations nearby.	Details regarding construction and operation of the proposed CPF are not within the scope of this EA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.	Paula Posas	MD Chapter of the Sierra Club
188	016	022	Utilities	Wastewater	The Draft EA reveals a significant change since the EIS. The Corps and Treasury now propose to discharge 120,000 gallons per day of wastewater through the Blue Plains Wastewater Treatment Plant ("WWTP") and then to the Potomac River, instead of discharging that wastewater through the BARC East WWTP and then to Beaverdam Creek.	Acknowledged.	Paula Posas	MD Chapter of the Sierra Club
189	017	022	Utilities	Wastewater	This means that the law requires a supplemental EIS that addresses these impacts to be released for public review and comment before a decision is made or construction begins. In addition, the Corps should address the compliance issues at the Blue Plains WWTP revealed in EPA's ECHO report for the existing currency production facility and whether those issues are likely to be exacerbated by wastewater discharges from the proposed CPF.	At this time, the BEP is in discussions with WSSC to develop constituent discharge standards that will be part of a WSSC issued System Discharge Permit. BEP will install an in-house industrial wastewater treatment system that meets or exceeds all WSSC discharge standards. As the WSSC constituent discharge standards are unknown at this time, a more detailed quality analysis cannot be accomplished at this time.	Paula Posas	MD Chapter of the Sierra Club
190	018	022	Utilities	Wastewater	Any potential impacts from new pollutants that would be discharged from the CPF and are not currently discharged by the existing currency production facility in Washington, D.C., should be considered, and any noncompliance issues with the current facility's pretreatment permit must be evaluated in a supplemental EIS.	At this time, the BEP is in discussions with WSSC to develop constituent discharge standards that will be part of a WSSC issued System Discharge Permit. BEP will install an in-house industrial wastewater treatment system that meets or exceeds all WSSC discharge standards. As the WSSC constituent discharge standards are unknown at this time, a more detailed quality analysis cannot be accomplished at this time.	Paula Posas	MD Chapter of the Sierra Club
191	019	022	Water Resources	Wastewater	While Sierra Club supports the change to avoid discharging wastewater into Beaverdam Creek, we share others' concerns that the Corps must analyze the water quality impacts of this revised plan to adequately support its decision to construct and operate the expanded CPF at this location.	At this time, the BEP is in discussions with WSSC to develop constituent discharge standards that will be part of a WSSC issued System Discharge Permit. BEP will install an in-house industrial wastewater treatment system that meets or exceeds all WSSC discharge standards. As the WSSC constituent discharge standards are unknown at this time, a more detailed quality analysis cannot be accomplished at this time.	Paula Posas	MD Chapter of the Sierra Club

192	020	022	Cultural Resources	Cultural Resources	The proposed CPF and related traffic and utilities mitigation work is within the BARC Historic District including the Central Farm and protections under the National Historic Preservation Act (“NHPA”) Section 106 process must apply. Yet, the Draft EA explains that the Bureau of Engraving and Printing completed archeological surveys only within the Limit of Disturbance for the proposed project. The Phase 1 and Intensive Phase 1 Archeological Survey for the project (prepared in November 2022) stated that “[p]roposed designs for the traffic improvements are ongoing, but no formal concept designs have been developed due to schedule delays.” As the designs develop, the Bureau of Engraving and Printing must ensure that they complete surveys for the areas that may be impacted.	Archaeological surveys were completed by BEP to identify historic properties within the proposed Area of Potential Effect (APE). As potential LODs were identified by the design team, archaeological surveys were completed by the project team to identify archaeological sites and historic properties that could be affected by the proposed undertaking (2022 and 2023). Though no formal concept designs were available at the time, the design team has since incorporated the survey findings into their plans. Should the LODs change/expand, additional surveys will be completed, and 106 consultation will be reopened.	Paula Posas	MD Chapter of the Sierra Club
193	021	022	Cultural Resources	Cultural Resources	We note that the Phase I Archeological Survey of 2022 evaluated an area that appears less extensive than the work proposed in the Draft EA. The gaps in the survey need to be remedied. The Draft EA states that the BARC and the BW Parkway are cultural landscapes. See Draft EA at 1-6. A “cultural landscape” is a term of art under the NHPA and to comply with the Act, the Corps must evaluate the impacts of the proposed work on viewsapes, natural features, and topographical features. These features do not seem to be adequately analyzed in the Phase 1 Archeological Survey or in the Draft EA and must be fully considered.	The archaeological surveys only evaluated potential impacts specifically to archaeological resources- not viewsheds, landscapes, historic districts, or the built environment. These other resources were considered during the larger Section 106 consultation conversations with the consulting parties. The BW Parkway was not included in the archaeological surveys for this project as it had already been surveyed previously by the NPS, so that data already existed for the team to reference. No National Register archaeological sites along the BW Parkway fall within the project LOD. Please refer to correspondence in Appendix A with MHT and consulting parties dated March 14, 2024, for additional discussion of potential impacts to historic property viewsheds and landscape features.	Paula Posas	MD Chapter of the Sierra Club
194	022	022	Cultural Resources	Cultural Resources	The assumption in the EA that the only NHPA Section 106 impacts are on archaeological or architectural resources within the BARC is premature. Instead, the determination of effects must be made in consultation with the Advisory Council on Historic Preservation, the Maryland Historical Trust, and any other consulting parties, as part of the Section 106 process for this undertaking. We also note that determination of eligibility lists many contributing features including, but not limited to architectural and archeological resources, including roads, meadows, and forests. The potential effect on these contributing resources must also be considered.	In accordance with 36CFR800, the Section 106 consultation process was followed concurrently to NEPA. Consulting parties included MHT, Tribes, MNCPPC, NCPC, and Anacostia Heritage Trails. Other federal agencies that participated/informed in the Section 106 process include- Federal Highway, USDA, and NPS. MHT serves as the MDSHPO. As BEP determined that there would be no adverse effect to historic properties and the MDSHPO concurred (36CFR 800.5 (c)(1)), the ACHP was not formally notified. <i>The ACHP was previously notified during the consultation for the main facility where was an adverse effect MOA was completed. The ACHP declined to participate. Once executed, that MOA was filed with ACHP, as required.</i> While BEP made the formal 'no adverse effect' determination, USDA and NPS concurred with this conclusion. Impacts to eligible historic district landscape features, such as roads, streams, and agricultural fields, were considered in addition to archaeological sites and built resources during the consultation process.	Paula Posas	MD Chapter of the Sierra Club
195	023	022	Cultural Resources	Cultural Resources	As the attached Surplus Demolition Building determination from 2021 explains: “The entire 6582-acre Beltsville Agricultural Research Center (BARC) Historic District was determined eligible for the National Register of Historic Places under Criteria A and C as the US government’s central agricultural resource facility since the early 20th century. Contributing resources of the historic district include buildings, strictures, major paved roads, including Powder Mill Road, minor service roads, field and research crops, pasture lands, seasonal ponds, forests, sustainable meadows, and other landscape features, and buildings.”	BEP has sought ways to minimize and avoid potential adverse effects to the BARC Historic District through consultation with MHT and other consulting parties. Examples of how the NRHP eligible landscape features have been considered: All construction laydown areas will be restored upon the completion of construction to minimize effects to BARC’s landscape. The proposed sewer and gas lines will be installed below ground to not disrupt the landscape’s appearance. The above ground utilities will be installed on poles similar in height and appearance to those utility poles already in use throughout BARC to minimize any potential visual impacts. New utility poles will be installed within existing utility corridors. The function of BW Parkway, Powder Mill Road, and Edmonston Road as major transportation routes through the historic districts for the public will be retained. While some individual trees may be impacted, no existing forest stands will be removed from the setting. No existing streams/water features will be removed/significantly redirected.	Paula Posas	MD Chapter of the Sierra Club
196	024	022	Cultural Resources	Cultural Resources	Sierra Club requests to be considered a consulting party for the CPF’s Section 106 process.	While the Section 106 consultation is now closed for this part of the project, if the project should change and consultation be reopened, the Sierra Club will be added as a consulting party for this project and all future related proposed undertakings.	Paula Posas	MD Chapter of the Sierra Club
197	025	022	Cultural Resources	Cultural Resources	Some of the Draft EA’s effects determinations for impacts to archeological sites are based on assumptions that the Corps and Treasury will avoid certain impacts or undertake certain actions. Those commitments must be enshrined in an eventual finding of no significant impact (FONSI) (provided that the other issues and other deficiencies are also addressed) or amended Record of Decision (ROD) and in bidding documents and construction contracts. Those commitment must include, but should not be limited to:	BEP made the Section 106 effect determination based on existing data, consulting party comments, and survey data. Language in the FONSI was reviewed and updated as needed to account for any commitments or mitigative measures.	Paula Posas	MD Chapter of the Sierra Club
198	026	022	Cultural Resources	Cultural Resources	No architectural or structural historic properties that contribute to the BARC Historic District will be directly impacted by the proposed work (they will be avoided).	This is accurate; should that change, Section 106 consultation would be reopened.	Paula Posas	MD Chapter of the Sierra Club
199	027	022	Cultural Resources	Cultural Resources	The portions of 18PR90, 18PR91, and 18PR92 that have not been subjected to additional survey by Bureau of Engraving and Printing (BEP) will be avoided during construction.	The unsurveyed portions of the sites will be avoided during construction. If the proposed LOD should change or expand to the east further into these sites, additional survey work will be completed and the Section 106 consultation will be reopened.	Paula Posas	MD Chapter of the Sierra Club
200	028	022	Cultural Resources	Cultural Resources	The project will avoid site 18PR1127.	BEP has confirmed with MHT’s records that 18PR1127 is not a historic property (“historic properties” as defined in 36 CFR 800.16).The site does not currently fall within the project LOD and no impacts to the site are anticipated. If the project’s LOD should change to include the site, NPS and MHT will be consulted.	Paula Posas	MD Chapter of the Sierra Club
201	029	022	Water Resources	General	The traffic lights and any stormwater bioswale features will be within the BW Parkway boundary.	Acknowledged	Paula Posas	MD Chapter of the Sierra Club
202	030	022	Water Resources	Stormwater	In close coordination with the National Park Service (NPS), any stormwater features will be designed to minimize their appearance on the landscape by using bioswale features with native plantings to retain green space. The edges of the bioswales will be “feathered” with plantings historically present along the Parkway to make the stormwater features less noticeable and in keeping with the NPS’ cultural landscape plan for the Parkway.	Acknowledged and BEP is incorporating these measures into the landscape design.	Paula Posas	MD Chapter of the Sierra Club
203	031	022	Cultural Resources	Cultural Resources	Any roadway signage will be in keeping with other signage present throughout the historic district.	Acknowledged. BEP coordinated signage during the Section 106 process under the CPF EIS. As a result, the signage will be in keeping with what is already present within the BARC Historic District.	Paula Posas	MD Chapter of the Sierra Club
204	032	022	Land Use	Cultural Resources	All laydown areas will be restored to their original agricultural use upon the completion of construction, minimizing effects to BARC’s setting.	Correct, all laydown areas will be restored.	Paula Posas	MD Chapter of the Sierra Club
205	033	022	Utilities	General	The proposed sewer and gas lines will be installed below ground.	Correct, sewer and gas lines will be installed below ground.	Paula Posas	MD Chapter of the Sierra Club
206	034	022	Utilities	General	The above ground utilities will be installed on poles similar in height and appearance to those utility poles already in use throughout BARC to minimize any potential visual impacts.	Correct, above ground utilities will be installed on poles similar in height and appearance to those utility poles already in use throughout BARC.	Paula Posas	MD Chapter of the Sierra Club
207	035	022	Utilities	General	New utility poles will be installed within existing utility corridors.	Correct, new utility poles will be installed within existing utility corridors.	Paula Posas	MD Chapter of the Sierra Club
208	036	022	Transportation	Rumble Strips	The removal of the rumble strips along Powder Mill Road will restore the rural agricultural setting and feeling for motorists passing through BARC.	Acknowledged.	Paula Posas	MD Chapter of the Sierra Club

209	037	022	Cultural Resources	Cultural Resources	This list must also be supplemented with the similar commitments to avoid impacts to historical properties from the EIS and original ROD. Additionally, the final EA must clarify what programmatic agreement or other agreement is governing the Section 106 process for this site and what procedures apply for inadvertent discoveries or unanticipated finds. Furthermore, the Corps and Treasury must carefully review the recommendations and conclusions of the Phase 1 Survey to ensure that all recommendations are followed.	BEP will comply with stipulations within the 106 MOA signed for the primary facility (consultation for this was completed concurrently with completion of the EIS) and 36CFR 800.13; recommendations proposed in the Phase I have been accepted and incorporated into the design plans.	Paula Posas	MD Chapter of the Sierra Club
210	038	022	Federal & State Listed Species	bats	Several federally and state protected bats in Prince George's County have been identified near the proposed CPF including four bat species: big brown, eastern red, hoary, and the tricolored bat.	Acknowledged.	Paula Posas	MD Chapter of the Sierra Club
211	039	022	Federal & State Listed Species	bats	Sierra Club has been closely following the status of the Northern Long-Eared Bat (NLEB) that is already listed under the Endangered Species Act (ESA) as federally endangered, and the tri-colored bat (Perimyotis subflavus), proposed to be listed federally as an endangered species based on widespread threats to the species. Forested areas provide summer roosting and foraging habitat for these species. The Corps and Treasury must ensure that these be preserved as part of construction of the CPF and related traffic and utilities mitigation work to ensure the continued existence of these bats.	Acknowledged. BEP will recoordinate with USFWS if there are changes to guidance or uplisting of species.	Paula Posas	MD Chapter of the Sierra Club
212	040	022	Federal & State Listed Species	bats	Fish and Wildlife Service (FWS) recently issued new, draft, voluntary consultation guidance for the NLEB and tri-colored bat. According to the Draft EA, the last consultation on the proposed traffic mitigation and utilities work was in January 2024, which is before FWS issued its voluntary guidance, so additional consultation is crucial. Sierra Club urges the Corps to ensure that their proposed plans for construction and operation of the CPF and for the traffic and utilities mitigation work are consistent with FWS's new guidance on impacts to bats and that the Corps engage a biologist to survey for bats and then reconsult with FWS as necessary under the ESA to ensure that the proposed work does not further imperil these species.	Acknowledged. BEP will recoordinate with USFWS if there are changes to guidance or uplisting of species.	Paula Posas	MD Chapter of the Sierra Club
213	041	022	Cumulative Impacts	Stormwater	The roadway improvements proposed in the Draft EA would be completed while the CPF is still not yet fully operational. Draft EA at 4-35. The Draft EA should have analyzed stormwater impacts from ongoing construction of the CPF together with the construction impacts from the traffic and utilities mitigation work.	Utility mitigation work, CPF access road construction, and the BARC well access road improvements will occur during construction of the CPF. Traffic mitigation work for the off-site roadway improvements will occur after the construction of the CPF, but before the CPF is fully operational. Cumulative impact analyses for water resources have been updated as follows: "Construction of Alternative 1 concurrent with proposed developments, including the overlapping construction period for the CPF and proposed utilities, could increase stormwater runoff in the vicinity; however, adherence to mitigation measures listed in Appendix B would be required to protect water resources during construction. Long-term implementation of Alternative 1 would increase impervious surfaces within the ROI. The additional impervious area would result in a collective increase in stormwater runoff that would cause soil erosion and sedimentation. BEP's incorporation of stormwater management features and practices into the design would minimize the Proposed Action's contribution towards adverse cumulative effects." See Section 4.7.1.2.	Paula Posas	MD Chapter of the Sierra Club
214	042	022	Water Resources	Stormwater	In addition, in a change from the EIS, the Draft EA states that all stormwater at the CPF will be retained and reused on site. ²⁶ More details about this plan and how the plan will accommodate increased and more intense rainfall events must be disclosed.	The following sentence: "Potential impacts would be minimized using green infrastructure and low impact development features established in Section 438 of the EISA, such as those planned for the adjacent BEP project, including "rainwater harvesting, pervious paving, and micro-bioretenention" as a part of the proposed CPF plan to retain and reuse 100-percent of stormwater on-site (M2182 NCPPC 2023)." will be revised to the following: "Potential impacts would be minimized using green infrastructure, low impact development features, and environmental site design established in Section 438 of the EISA and required by MDE for a federal projects located in Prince George's County."	Paula Posas	MD Chapter of the Sierra Club
215	043	022	Water Resources	Surface Waters & Water Quality	Moreover, the Corps must also carefully analyze whether Beaverdam Creek and other nearby surface waters can absorb additional pollutants and impacts from the traffic and utilities work proposed in the Draft EA and why that stormwater cannot be retained onsite. The proposed work should avoid impacts to Beaverdam Creek and Indian Creek to protect water quality and habitat. This includes performing a full Tier II analysis of impacts to those waters and evaluating remaining assimilative capacity as required by the Maryland Department of the Environment. The Maryland Department of Natural Resources has occurrence data that shows that Beaverdam Creek specifically supports rare, threatened and endangered odonates, fish and plants, and those species and their habitat must be protected.	A Tier II Antidegradation Review will occur during the permitting process.	Paula Posas	MD Chapter of the Sierra Club
216	044	022	Water Resources	Stormwater	The Corps and Treasury must ensure that construction companies follow all stormwater-related requirements related to construction and operation to reduce impacts to those waters. These conditions, including the Corps and Treasury's commitment to reuse and retain all stormwater at the CPF site, should be included in the FONSI or amended Record of Decision issued once the EA is finalized. Moreover, the Corps and Treasury should include stormwater monitoring and treatment requirements in any construction contract issued by the Corps or Treasury.	BEP will require contractors to comply with all state and federal regulations related to stormwater management.	Paula Posas	MD Chapter of the Sierra Club
217	045	022	Water & Natural Resources	General	The Corps and Treasury must select design alternatives that reduce wetland impacts and impacts to forested areas as well as individual trees. The Baltimore-Washington Parkway, which is included in the proposed work under the Draft EA currently provides a forested corridor that "serves as a dispersal corridor for wildlife. The forest reduces habitat fragmentation, protects plant and animal species against increased urbanization, and reduces potential impacts from climate change. The forested buffer along the parkway assists with the protection of regional species and enhances biodiversity." In addition the Parkway forested areas serve "as an increasingly important corridor for wildlife, from forest dwelling species to migratory birds." The Corps and Treasury should do more to avoid impacts to the Parkway's forested areas.	Acknowledged. BEP has continued to coordinate with NPS regarding proposed improvements to the BW Parkway throughout the planning process.	Paula Posas	MD Chapter of the Sierra Club
218	046	022	Water Resources	wetlands	The EPA has suggested that wetland functions must be assessed to allow for appropriate mitigation. We join those comments and urge the Corps to mitigate all lost wetland functionality.	Impacts to wetlands will be further addressed in the permitting process.	Paula Posas	MD Chapter of the Sierra Club
219	047	022	Vegetation	Trees	The proposal for both the CPF and related traffic and utilities mitigation work currently includes cutting down forested acres which engenders critical habitat loss. The Corps and Treasury must continue to refine their proposed work to avoid forest removal where possible and to mitigate any tree cover loss with at least a five-to-one ratio of trees replaced to those lost.	BEP will comply with all state and federal regulations regarding tree clearing	Paula Posas	MD Chapter of the Sierra Club

220	048	022	Climate Change & Greenhouse Gas	General	<p>The Draft EA does not sufficiently acknowledge the changes in Maryland’s rainfall patterns due to climate change. When the Corps and Treasury propose a project like the CPF and related traffic and utilities mitigation work with anticipated increased impervious surface impacts, it must include an analysis in its NEPA documents of those impacts, considering the changed rainfall intensity and patterns and the knock-on impacts to nearby surface and groundwater, and do everything it can to avoid increases in impervious surface.</p>	<p>The design for stormwater management would comply with MDE’s requirements as outlined below:</p> <p>-Stormwater Management</p> <p>The project will be analyzed with the latest state and federal regulations as it relates to rainfall intensity data. The latest update data was the “NOAA Atlas 14” which is historical precipitation data that follows the most recent recorded rainfall patterns in the area. The stormwater management facilities will be designed to manage the mandated rainfall intensities per the Atlas 14 data.</p> <p>-Stormwater management -10 year quantity control:</p> <p>The 10-year and 100-year post-development peak discharges will be designed to be below the respective pre-development (i.e., current existing conditions) peak discharge flow rates, as required by MDE. The project will meet MDE’s quantity management requirement.</p> <p>Revised SEA as follows: "Furthermore, the project will be analyzed with the latest state and federal regulations as it relates to rainfall intensity data. The latest update data was the “NOAA Atlas 14” which is historical precipitation data that follows the most recent recorded rainfall patterns in the area. The stormwater management facilities will be designed to manage the mandated rainfall intensities per the Atlas 14 data. The 10-year and 100-year post-development peak discharges will be designed to be below the respective pre-development (i.e., current existing conditions) peak discharge flow rates, as required by MDE. The project will meet MDE’s quantity management requirement." See Section 4.7.1.1.</p>	Paula Posas	MD Chapter of the Sierra Club
221	049	022	Noise	Suppression Plan	<p>The Draft EA could do more to require that the CPF and related traffic and mitigation work are designed to reduce noise impacts. The final EA should include specific benchmarks for the required noise-suppression plan. Communities impacted by the traffic and construction and operation of the CPF should also not have to endure any more ongoing noise impacts than absolutely necessary.</p>	<p>Details regarding construction and operation of the proposed CPF are not within the scope of this EA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.</p> <p>Prior to construction, Government will require contractor to develop noise suppression plan and monitoring program for the Proposed Action in the SEA. The noise suppression plan and monitoring program are not part of this SEA.</p>	Paula Posas	MD Chapter of the Sierra Club
222	050	022	General	General	<p>Finally, as for archeological and stormwater impacts, in general, required mitigation measures, permits, and impact plans, must be memorialized in the FONSI or amended Record of Decision. For example, the Draft EA includes several mitigation measures, including required permits, in the Mitigation Measures Table in Appendix C. Relevant conditions from those measures, permits, state and federal requirements, and required planning documents must also be explicitly included in bidding documents and construction contracts to ensure compliance.</p>	<p>Mitigation measures will be included in the FONSI.</p> <p>Relevant conditions, permits, requirements, mitigation measures and planning documents will be provided to the contractors.</p>	Paula Posas	MD Chapter of the Sierra Club
223	051	022	General	Wildlife	<p>Sierra Club joins our local partners to oppose siting the CPF in the BARC. In an area with limited greenspace, allowing an industrial facility into the BARC is like opening a Pandora’s Box. Allowing one industrial facility in the BARC could serve as a precedent for other industrial uses in an area that provides much needed contiguous wildlife habitat. Further fragmentation of this essential green space would go against state and federal land preservation goals.</p>	<p>Details regarding construction and operation of the proposed CPF are not within the scope of this EA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.</p>	Paula Posas	MD Chapter of the Sierra Club
224	052	022	Water & Natural Resources	General	<p>The Maryland Department of Natural Resources’ Wildlife and Heritage Service identified declines in extensive, unbroken forested area as a key reason for declines in Forest Interior Dwelling Species in Maryland and strongly encourages conservation of that habitat. Building the CPF in the BARC threatens to disrupt more habitat, to adversely impact water quality in key Maryland streams, and to impact nearby communities.</p>	<p>Details regarding construction and operation of the proposed CPF are not within the scope of this EA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.</p>	Paula Posas	MD Chapter of the Sierra Club
225	053	022	General	General	<p>Private corporations are likely eyeing the proposed CPF and hoping to site their own industrial facilities there. Sierra Club urges the Corps and Treasury to reconsider their plans and propose another location in Prince George’s County for the CPF on a remediated brownfield.</p>	<p>Details regarding construction and operation of the proposed CPF are not within the scope of this EA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.</p>	Paula Posas	MD Chapter of the Sierra Club
226	054	022	Transportation	General	<p>The Draft EA proposes to widen Powder Mill Road through the BARC and the southern part of Edmonston/Kenilworth Road to the Beltway, which are already highly trafficked roads. The additional traffic from workers using these roads while constructing the CPF and undertaking the related traffic and utilities mitigation work, and from the commuters who will eventually work at the CPF, threaten to change the character of these roads. Moreover, they will add unwanted traffic congestion, greenhouse gas emissions, and other air pollution to these areas, as discussed above. All of those impacts must be fully analyzed in the Draft EA.</p>	<p>See the EIS and Record of Decision regarding comments associated with construction and operation of the CPF. Transportation impacts associated with constructing the roadway and utilities upgrades are addressed in the SEA.</p>	Paula Posas	MD Chapter of the Sierra Club
227	055	022	Transportation	Emergency Response	<p>Furthermore, this additional traffic will impact emergency response times in the area. Beltsville and Greenbelt are relatively small communities and their fire stations like many others have had issues with staffing. The Draft EA must address how adding traffic to these roads will affect the ability of fire stations and other first responders to address emergencies.</p>	<p>BEP coordinated with USDA BARC, emergency responders, local homeowner associations and schools on the Proposed Action and received positive feedback about removal. Only USPP responded with concern regarding removing rumble strips. As the traffic mitigation design progresses, safety measures will continue to be evaluated. BEP will follow direction from USDA BARC regarding the removal of rumble strips, as they are the agency with jurisdiction on Powder Mill Rd.</p>	Paula Posas	MD Chapter of the Sierra Club
228	056	022	Hazardous & Toxic Materials & Waste	General	<p>The Draft EA does not address the current or likely increased runoff of 6PPD-Q that the CPF and traffic and utility mitigation work will cause. 6PPD-q is created by the interaction of a tire manufacturing chemical (6PPD) and the environment as tire particles are released, found on roads, parking lots, and in stormwater. It poses lethal effects to trout and other fish species present in the watershed, and emerging science points to toxicity in mammals and risks to human health as well. The draft EA fails to evaluate the effects or potential practices to mitigate its harms. Before adding extensive impervious surface that will be used by cars and trucks, the Agencies should sample area waterbodies, compare 6PPD and 6PPD-q concentrations to EPA’s recently published screening values, and evaluate how the increased surface and tire traffic will impact those values.</p>	<p>BEP will adhere to any compliance testing required by State or Federal regulations under the Proposed Action of the SEA.</p>	Paula Posas	MD Chapter of the Sierra Club
229	057	022	General	Local Benefits	<p>The Corps and Treasury should guarantee that the local community benefits from jobs in construction and at the new CPF once it is operational by ensuring that Prince George’s County residents have priority access to jobs created. The Governor of Maryland, Wes Moore, recently signed an executive order to promote workforce development in state projects. Treasury and the Corps should use Maryland’s example as a model for the CPF and ensure that all contracts signed for the CPF promote workforce development, apprenticeship programs, and local hiring, particularly in high unemployment areas. The Corps and Treasury must ensure in their contracting that the construction and operation of the CPF as well as related traffic and utilities mitigation projects provide an opportunity to improve the well-being of Marylanders.</p>	<p>Federal government adheres to the Federal Acquisition Regulations (FAR) to acquire supplies and services with appropriated federal funds.</p>	Paula Posas	MD Chapter of the Sierra Club

230	058	022	Transportation	General	<p>Any intersection and roadway improvements should also be designed to satisfy “complete streets” goals. This means the designs should include additional bus stops to allow for multi-modal transit, accommodate new separated walking and biking paths, and include curb bump outs to allow safer pedestrian movement. Maryland Department of Transportation recently released a state-wide policy that aims to reduce traffic deaths and “ensure that a range of safe options for multimodal transportation, including active transportation, are prioritized throughout all phases of project development.” Those principles of encouraging bike lanes, pedestrian pathways, and accessible transit must be applied to the projects proposed by Treasury and the Corps related to the CPF.</p>	<p>Acknowledged.</p> <p>Adding pedestrian pathways is outside of Treasury’s jurisdiction. Treasury does not own any property along Edmonston Rd. or Powder Mill Rd. and would require Congressional approval to grant Treasury the authority for any improvements outside of improving the vehicular level of service (LOS) identified in the Transportation Impact Study (TIS). In accordance with BEP’s Transportation Management Plan (TMP) submitted to the National Capital Planning Commission (NCP), BEP is committed to working with USDA to implement local shuttle bus service(s) to enhance connection to public (rail) transit.</p>	Paula Posas	MD Chapter of the Sierra Club
231	059	022	Transportation	General	<p>Roadway pedestrian fatalities spiked in the early 2020s nationwide and Maryland alone saw 600 roadway deaths in 2023. Maryland is recommitting to road safety and agencies responsible for projects on Maryland roads should also commit to making Maryland’s roadways safer. Relevant to the CPF and related traffic and utilities mitigation work, this commitment should include improving culverts and other infrastructure to create wildlife corridors and minimize vehicle strikes.</p>	<p>Acknowledged.</p> <p>Adding pedestrian pathways or wildlife corridors is outside of Treasury’s jurisdiction. Treasury does not own any property along Edmonston Rd. or Powder Mill Rd. and would require Congressional approval to grant Treasury the authority for any improvements outside of improving the vehicular level of service (LOS) identified in the Transportation Impact Study (TIS). However, BEP will comply with federal, state, and county stormwater and floodplain requirements and will improve culverts as needed.</p>	Paula Posas	MD Chapter of the Sierra Club
232	060	022	Transportation	General	<p>Additionally, in designing these projects, the CPF must be based on recent traffic data, including data post-2020, to ensure that the roadway improvements address Marylanders’ current commuting and daily needs rather than addressing the traffic patterns of the past decades. This analysis should include pre-construction crash data and animal strike data to understand what intersections and roadway sections need to be improved to reduce those issues. The Corps and Treasury should also commit to post-construction traffic data monitoring to ensure that the fixes were effective.</p>	<p>Acknowledged.</p>	Paula Posas	MD Chapter of the Sierra Club
233	001	023	Transportation	Rumble Strips	<p>One of the anticipated impacts of the preferred alternatives BEP discusses is the removal of all rumble strips on Powder Mill Road between MD201/Edmonston Road and the Baltimore-Washington (BW) Parkway, which “would reduce noise levels and noise complaints from BARC employees and the community.” Therefore, this action purports to have a long-term, beneficial impact on noise levels. The EA asserts that these roadway improvements will not diminish the integrity of the historic district but will make the historic district safer for the public accessing BARC and will restore the rural agricultural setting and feeling for motorists passing through BARC. However, BEP’s conclusion that rumble strip removal will make Powder Mill Rd. safer seems overly rosy, particularly as there is no discussion as to its basis or the fact that motorists on BARC often exceed the posted speed limits even with rumble strips; what will be the effect when the rumbles are removed?</p>	<p>Acknowledged.</p> <p>BEP will follow direction from USDA BARC regarding the removal of rumble strips, as they are the agency with jurisdiction on Powder Mill Rd. The CPF Access Rd. includes signalization and a reduced speed limit from 35 to 25 mph on Powder Mill Rd. between West Animal Husbandry Rd. and Research Rd., increasing vehicular safety. BEP will ensure vehicular safety on Powder Mill Rd. throughout the construction duration to the best of their ability by utilizing temporary traffic control measures.</p>	Kiki Theodoropoulos	
234	002	023	Transportation	Rumble Strips	<p>The International Road Assessment Programme (iRAP), the umbrella program for Road Assessment Programs worldwide working to save lives and prevent serious injuries on the world’s roads, states the primary purpose of rumble strips is as a road safety feature to alert inattentive and impaired drivers of unintentional lane drift and upcoming road changes through noise and vibration; these road changes include curving roads such as on Powder Mill Rd. on BARC. Whenever a vehicle’s tires drive over a series of raised or recessed rumble strips, the unevenness causes substantial vibrations felt inside the car and a loud noise often heard by nearby neighborhoods and inside the vehicle.</p>	<p>Acknowledged.</p>	Kiki Theodoropoulos	
235	003	023	Transportation	Rumble Strips	<p>Yes, driving over rumble strips may be noisy, but rumbles also protect motorists from crossing the center line, given the many curves and intersections of Powder Mill Rd, and joggers and cyclists, who can often be seen riding on BARC. For example, according to the Federal Highway Administration, 11 states and 1 national study have analyzed the effectiveness of center line rumbles in reducing crashes. These studies concluded that crossover crashes were reduced 18 to 64 percent, with most studies showing 40 to 60 percent reductions. BEP’s conclusion that removing the rumble strips will increase roadway safety on Powder Mill Rd. seems implausible, particularly given that the number of vehicles accessing BARC would increase dramatically by BEP’s own assessment. For example, BEP’s final environmental impact statement (EIS) states that there would be an estimated 7,278 dump truck trips over the entirety of the CPF’s construction period. Because of the decreased accessibility of the proposed facility to public transit compared to the BEP facility in Washington, D.C., the number of employees driving personal vehicles would increase, with almost 1,300 more cars on the road in Beltsville daily. In addition, the EIS states that there would be approximately 82 heavy duty diesel trucks, including semis, arriving at and departing from the CPF weekly for shipments and deliveries. Struggling to see how the safety of motorists and cyclists on Powder Mill Road will not be negatively affected by the removal of rumble strips with the simultaneous increase of heavy duty trucks.</p>	<p>BEP will follow direction from USDA regarding the removal of rumble strips, as they are the agency with jurisdiction on Powder Mill Rd. The CPF Access Rd. includes signalization and a reduced speed limit from 35 to 25 mph on Powder Mill Rd. between West Animal Husbandry Rd. and Research Rd., increasing vehicular safety. BEP will ensure vehicular safety on Powder Mill Rd. throughout the construction duration to the best of their ability by utilizing temporary traffic control measures.</p>	Kiki Theodoropoulos	
236	001	024	Natural Resources	General	<p>(A) B-203 MDE statement: “...our remote analysis suggests that the forested area on this property contains Forest Interior Dwelling Species (FIDS) habitat, especially for birds.” I tend to disagree. I’ve placed nest boxes on this site for 30 years and continue to do so as I have been granted a permit by Treasury for the open space at the site. It’s not a forested site. It’s open space dotted with trees and attracts birds other than FIDS. There are other areas at BARC which are FIDS areas. The open space on the BEP site, should remain open meadow/wetland dotted with the current large, old native trees. The area under these trees, I believe should follow an Integrated Vegetation Management plan from the EPA. In the past, prior to the Intercounty Connector choosing BEP for tree planting to replace those lost for road construction, a native meadow was planted among the large native trees at the northwest corner of Poultry Research Road. Once these new trees were planted at the site, stewardship for the site stopped, so invasive weeds and trees took over and the meadow was no more. This has happened at numerous sites throughout BARC. The BEP site can be a model for the rest of BARC if the open areas can be maintained and cared for.</p>	<p>Acknowledged.</p>	Marcia Van Horn	

					(B) As far as noise goes, I'd like to request that noise at the site, once in operation, be minimized as much as possible. (1) Air conditioners, heat pumps, etc. should not emit excess noise and if there is a way to help block the sound emitted, that would be good, so as not to disturb the wildlife and to aid in their communication with each other. (2) Outdoor amplified communication, like one might here at a school parking lot or Home Depot, should be minimized. (3) Per Maryland Transportation Section 22-402: "A person may not use on the exhaust or "tail pipe" of a motor vehicle any extension or other device to cause excessive or unusual noise." With 3 shifts at BEP, motor vehicle exhaust noise and large Bass speakers might disturb wildlife at all hours of the day. This excessive noise is against the law in Maryland and perhaps BEP security can make sure workers follow the law. (4) Large speed bumps will create more noise than is necessary. These should be kept lower.	Acknowledged. Details regarding construction and operation of the proposed CPF are not within the scope of this SEA; please refer to the Final EIS for the Construction and Operation of a CPF within the National Capital Region.	Marcia Van Horn	
237	002	024	Noise	General				