DEPARTMENT OF THE TREASURY

FINAL FINDING OF NO PRACTICABLE ALTERNATIVE FOR CONSTRUCTION AND OPERATION OF A CURRENCY PRODUCTION FACILITY WITHIN THE NATIONAL CAPITAL REGION

1.0 Introduction

Comprised of nearly 6,600 acres of land, the Henry A. Wallace Beltsville Agricultural Research Center (BARC) is situated 10 miles northeast of Washington, DC and 20 miles southwest of Baltimore, Maryland. Just outside the Capital Beltway (i.e. Interstate I-495) BARC is bordered by the suburban community of Beltsville, the cities of Greenbelt and College Park, and by several other federal properties.

The United States Department of the Treasury (Treasury) proposes to construct and operate a new Currency Production Facility (CPF) within the National Capital Region (NCR) (Proposed Action) to replace the Bureau of Engraving and Printing's existing production facility located in downtown Washington, DC.

Under Executive Order (EO) 11988, *Floodplain Management*, federal agencies must find that there is no practicable alternative to development within the 100-year floodplain. Under EO 11990, *Protection of Wetlands,* federal agencies must avoid undertaking new construction located in wetlands unless the head of the agency finds that there is no practicable alternative to such construction. Further, Treasury must take all practicable measures to minimize harm to or within floodplains and wetlands. Treasury has determined that elements of the Proposed Action must be located within wetlands on the BARC parcel. No floodplains exist within the study area and will not be addressed in this document.

This preliminary finding incorporates the analysis and conclusions of the June 2021 *Construction and Operation of a Currency Production Facility within the National Capital Region, Final Environmental Impact Statement* (Final EIS). It is being made available to the public with the Final EIS, in accordance with both EOs.

2.0 Notice of Wetland Involvement

EO 11990 requires that each federal agency, to the extent permitted by law, "shall avoid undertaking or providing assistance for new construction located in wetlands unless the head of the agency finds: (1) that there is no practicable alternative to such construction; and, (2) that the proposed action includes all practicable measures to minimize harm to wetlands which may result from such use." The term "wetlands" means "those areas that are inundated by surface or ground water with a frequency sufficient to support and under normal circumstances does or would support a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction."

Portions of the Proposed Action would be constructed in the wetlands on the BARC parcel (see **Figure 1**). Development can impact these natural resources via the loss or degradation of their natural functional benefits such as water storage, infiltration, and filtration. These impacts extend to the intrinsic value of these resources or the benefits associated with their use, such as wildlife habitat, recreation, and aesthetic enjoyment. Wetland functions and values are also susceptible to changes in the volume, rate, and quality of stormwater discharge, particularly as influenced by the amount of impervious surface within a watershed.

3.0 Description of the Proposed Action and Discussion of Alternatives

The Proposed Action includes construction and operation of an approximately 1 million square-foot CPF within the NCR. The Proposed Action would provide a modernized, efficient facility located within the NCR to replace the over 100-year-old facility located in downtown Washington, DC.

Alternatives Selection Criteria

Treasury, through a 20-year planning process, undertook a robust, logical, and sequential site screening process described in detail in the Final EIS. Once it was determined that construction of a new facility was the best course of action, 81 potential sites were identified in the NCR that had the potential to support Treasury's initial minimum criteria for the Proposed Action, of which 31 sites met the initial criteria of adequate parcel size (i.e., 60 acres or more) and

appropriate location (i.e., within a 30-mile radius of central Washington, DC and within 10 miles of a major interstate). Of these 31 sites, only 6 were already under federal control, a follow-on requirement as described in the Final EIS, Section 2.3. The six sites were further narrowed down to a single site based on the following: location, accessibility of the site to major roadways and an international airport, availability for transfer to Treasury in a timely manner, adequate parcel size, and developability (site must not be unduly constrained to development due to terrain or other construction or use limitations).

Alternatives Subject to Further Analysis

Based on the selection criteria analysis described above, Treasury determined that only its proposed approximately 104-acre parcel in the Central Farm of BARC would meet its purpose of and need for the Proposed Action; this is Treasury's Preferred Alternative. This Preferred Alternative, as well as the No Action Alternative, were carried forward for detailed analysis.

No Action Alternative

Under the No Action Alternative, Treasury would not construct and operate a new CPF at BARC. Existing conditions at BARC would continue for the foreseeable future, and Treasury would continue operations in its existing, obsolete, owned and leased facilities. The No Action Alternative did not meet Treasury's screening criteria, but was carried forward for analysis in the EIS in accordance with National Environmental Policy Act (NEPA) requirements to provide a baseline against which impacts of the Proposed Action could be measured. Because it does not meet the purpose of and need for the Proposed Action, this alternative is not "practicable" within the meaning of EO 11990.

Preferred Alternative

The Preferred Alternative would implement the Proposed Action by constructing and operating a new CPF on the 104-acre parcel on BARC. In addition to the approximately 1 million square foot CPF, Treasury would also construct a new entrance road connecting its proposed parcel to Powder Mill Road, together with several minor modifications to Powder Mill Road in the vicinity of the intersection with the new entrance road to reduce potential impacts on traffic flow. Specifically, Treasury would install a traffic control device (e.g., a traffic light) at the intersection of Powder Mill Road and the entrance road, widen Powder Mill Road to accommodate additional lanes, and remove the existing rumble strips on the reconstructed portion of Powder Mill Road. These proposed modifications/upgrades would result in construction activities within an additional 18 acres, bringing the combined Project Site to a total of approximately 122 acres.

This alternative meets the purpose of and need for the Proposed Action. It is the only practicable alternative within the meaning of EO 11990.

Impacts and Mitigation Measures

Field investigations conducted in support of the NEPA analysis for this Proposed Action documented approximately 2.94 acres of wetlands within the 104-acre parcel and the additional 18-acre study area that will provide for traffic improvements off Powder Mill Road used to access the site. The Proposed Action would permanently affect approximately 0.94 acres of wetlands. This total wetland impact could be reduced by 0.18 acre to a total of 0.76 acre of direct impact if Treasury selects the Preferred Alternative and adopts mitigation measures recommended in the Final EIS (see below). No temporary wetland impacts would be anticipated.

Construction of the Proposed Action would place fill in Wetlands 2 and 3 (see **Figure 1**), both isolated and not regulated by the US Army Corps of Engineers (USACE) Regulatory Branch, totaling 0.73 acre. Wetland 2 falls largely within the footprint of the proposed building itself and Wetland 3 falls within the parking area.

Site constraints render avoiding impacts to these two wetlands highly impractical: an existing mandatory reforestation area associated with previous Intercounty Connector construction is located south of Odell Road within the northern portion of the study area. Wetland 4, the largest of the wetlands, is situated in the southeast corner of the Project Site. Three site configurations were evaluated by the design team, all of which incorporated on-site preservation of these two large natural features. Elements of the main design, to include the orientation of the main axis of the building, the location of a possible expansion area, and the parking lot, were considered in different layouts across the three scenarios in an effort to reduce direct impacts to wetlands and other natural features to the maximum extent practicable, while still meeting the minimum design parameters for the CPF (including a perimeter fence, patrol road, an earthen

berm along the building's production floor, and stormwater management features).

Wetlands 7 and 8, connected downstream to Beaverdam Creek by an unnamed, intermittent channel, total 0.18 acre in size and are regulated by USACE and the Maryland Department of the Environment (MDE). These wetlands are located within the project limits of disturbance (LOD) associated with improvements to the existing configuration of Powder Mill Road. Construction of the proposed security fence along the boundary of Treasury's proposed parcel could impact 0.03 acre of Wetland 4, also connected to surface waters downstream and regulated by USACE and MDE. The perimeter fence is necessary to ensure this essential building is secured and would only impact a peripheral outcrop of the wetland at its easternmost extent. Treasury has made deliberate efforts not to locate any appurtenant structures within this wetland, the largest of the on-site wetlands.

In total, the Proposed Action would impact 0.94 acre of wetlands within the Project Site (i.e., 0.11 percent of wetlands on BARC) and 0.65 acre of MDE-regulated nontidal wetland buffer. As the Proposed Action would impact less than 1 acre of isolated, nontidal wetlands, an exemption from mitigation requirements for those wetlands under Maryland's Nontidal Wetlands Protection Program may be applied for and any required mitigation will be implemented as directed.

No operational activities of the proposed CPF would encroach upon Wetlands 4 and 6 and their associated buffers. Therefore, operation of the Proposed Action would have no adverse impacts on these wetlands.

EO 11990 requires that the proposed action include "all practicable measures to minimize harm to wetland[s]." Prior to implementing projects impacting wetlands, the construction contractor would obtain coverage under applicable permits issued by USACE in accordance with the Clean Water Act (CWA). Adherence to avoidance, mitigation, and compensation measures specified in the permits would be required. These include all practicable measures available to ensure that wetland impacts are mitigated to the extent possible.

Additionally, Environmental Protection Measures (EPMs), Regulatory Compliance Measures (RCMs), and Best Management Practices (BMPs) would be incorporated into the Proposed Action to avoid or minimize impacts on these wetland resources and are collectively described, as follows:

- Incorporate a suitable diversion of the unnamed intermittent stream on-site such that it does not overlap the project LOD. This diversion would need to maintain the existing stream flow and hydrologic function of the stream to the extent practicable using a natural stream system.
- Obtain and adhere to appropriate permits (or letters of exemption) from the MDE and USACE to comply with Sections 404/401 of the CWA and comply with all BMPs established throughout this consultation process.
- Obtain a *Maryland General Permit for Stormwater Associated with Construction Activity* to manage stormwater associated with construction of the Proposed Action. Treasury would prepare and adhere to a state-approved Erosion and Sediment Control Plan and submit a Notice of Intent to meet the requirements of the federal National Pollutant Discharge Elimination System program. Treasury would also manage stormwater discharges and maintain water quality through compliance with existing total maximum daily loads.
- Comply with Maryland Tier II Antidegradation Review policies.
- Consider all Maryland Stormwater Management Controls, Environmental Site Design, and "Green Building" Alternatives, as described by MDE, during design of the proposed CPF.
- Comply with Maryland's Erosion and Sediment Control Regulations, Stormwater Management Regulations, the Maryland Stormwater Management and Erosion & Sediment Control Guidelines for State and Federal Projects, and associated technical memoranda.
- Incorporate, as required by Section 438 of the Energy Independence and Security Act, green infrastructure or low impact development measures to maintain the pre-development hydrology of the Project Site to the maximum extent technically feasible during operation, minimizing any change in the rate, volume, and temperature of stormwater discharging to off-site areas.
- Incorporate, as required by EO 13508, stormwater control BMPs to manage and reduce pollution flowing from the Project Site into the Chesapeake Bay and its tributaries.
- Submit a Federal Consistency Determination to the Maryland Department of Natural Resources (MDNR) for review and concurrence.

- Demarcate the construction LOD in the field to prevent encroachment on unpermitted surface water resources.
- Establish construction staging areas at least 100 feet away from surface water resources.
- When excavating below the groundwater table, incorporate measures that minimize potential impacts to local shallow groundwater, including dewatering these areas, preventing discharge of any water potentially contaminated during the construction/demolition process, and restoring sites to natural subsurface conditions prior to construction of the proposed CPF.

The above steps would be implemented as "mitigation by design" and are a proactive means of minimizing environmental impacts.

Additionally, Treasury has identified the following additional recommended mitigation measures that may be implemented to further reduce potential adverse impacts to wetlands:

- Design the Preferred Alternative to fully avoid Wetland 7 and/or Wetland 8 during construction (and operation) activities (e.g., by adjusting proposed entrance road and Powder Mill Road improvements).
- If not already required through the federal and/or state wetland permitting processes, mitigate wetland fills at a 1:1 ratio through on-site or off-site replacement, purchase of wetland mitigation bank credits, or payment of in-lieu fee.

Taken together, these EPMs, RCMs, BMPs, and recommended mitigation measures would avoid or minimize the loss of and impacts on wetlands at the BEP Project Site. These measures represent all practicable measures to minimize harm to wetlands.

4.0 Finding

During development of the CPF site design, Treasury considered alternatives for the site layout and sought ways to minimize impacts to resources early in the design process using information obtained from the Site Constraints Report dated December 2019 and updated in June 2020.

Treasury has made, and will continue to make, efforts to site the needed facilities entirely outside of wetlands and other regulated waters while still addressing the facility's operational needs and safety requirements. Due to the location of waters in proximity to established roadways necessary to access the site, and the need for a perimeter fence to provide security, it was determined that complete avoidance of wetlands may not feasible, although it would be duly considered during the design process. Alternatives that would entirely avoid developing in wetlands were also eliminated from consideration, for the reasons discussed above. As such, Treasury has determined there are no practicable alternatives to avoiding development within wetlands on BARC.

Following a thorough evaluation of alternate plans that would satisfy the purpose of and need for the Proposed Action, I find that there is no practicable alternative to siting elements of the Proposed Action within wetlands. Therefore, Treasury will ensure that all practicable measures to minimize harm to wetlands are incorporated into the Proposed Action.

October 8, 2021

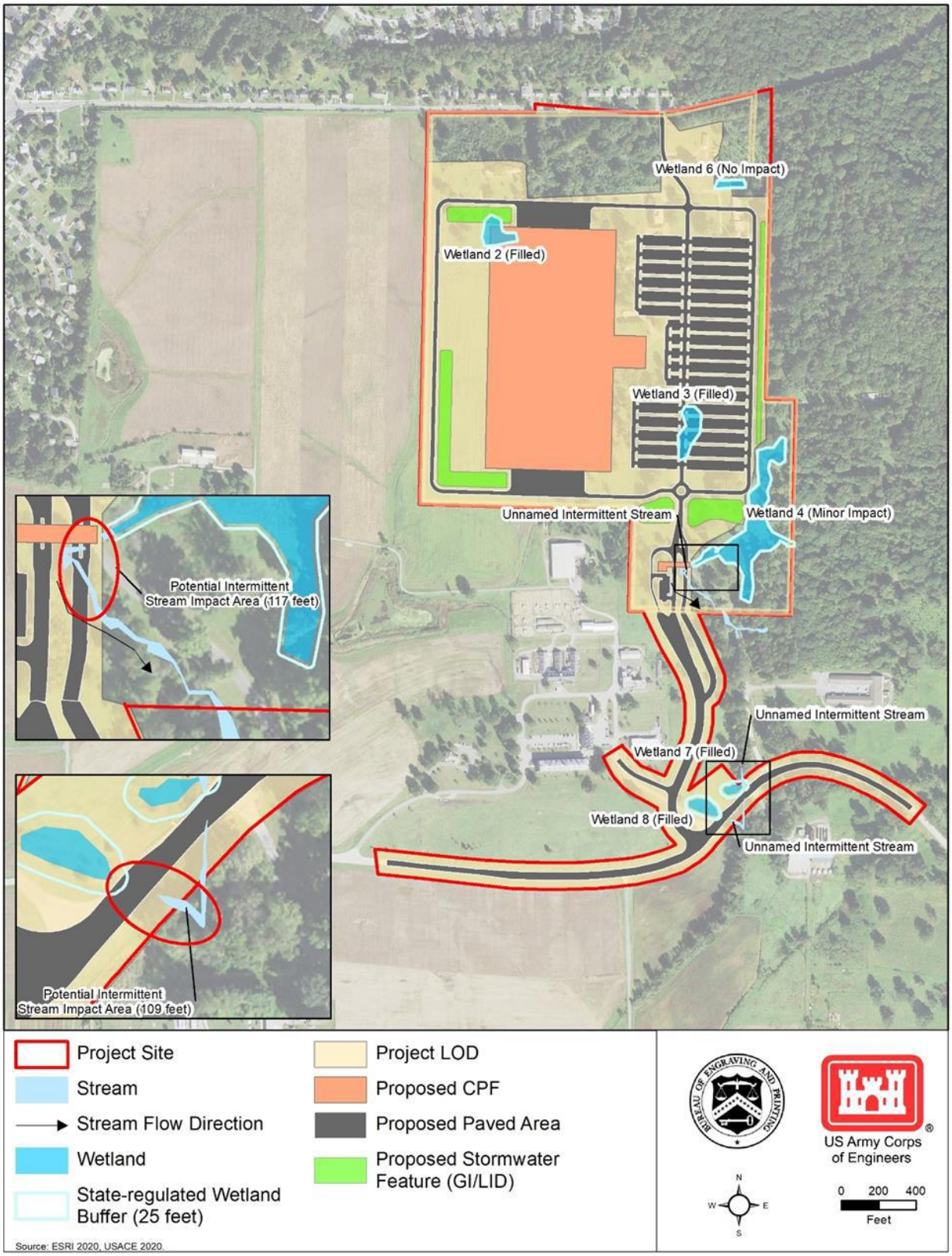
John T. Norris Digitally signed by John T. Norris Date: 2021.10.08 12:10:37 -04'00'

Date

J. Trevor Norris
Acting Assistant Secretary for Management
US Department of the Treasury

Attachments: Figure 1. Potentially Impacted Water Bodies and Proposed Stormwater Infrastructure (Figure 3.7-3 of Final EIS)

Figure 1. Potentially Impacted Water Bodies and Proposed Stormwater Infrastructure



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