

US Department of the Treasury

Draft Environmental Impact Statement

Public Comments

November 6, 2020 - December 21, 2020



US Army Corps
of Engineers®



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Federal Agency Comments

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-----Original Message-----

From: Chris Daniel [mailto:]

Sent: Monday, November 9, 2020 10:49 AM

To: BEP-EIS <BEP-EIS@usace.army.mil>

Cc: Alexis Clark < >; Tom McCulloch < >; Christopher Wilson < >;

< >; Brighton, Nancy J CIV USARMY CEHQ (USA)

< >

Subject: [Non-DoD Source] RE: [External] Notice of Availability for the Draft Environmental Impact Statement for the proposed Replacement Currency Production Facility at the Beltsville Agricultural Research Center in Prince George's County, Maryland

To Who It May Concern,

Thank you for including the Advisory Council on Historic Preservation (ACHP) on the US Department of the Treasury's, Bureau of Engraving and Printing (BEP), notice for the Draft Environmental Impact Statement (EIS) for the proposed Replacement Currency Production Facility at the Beltsville Agricultural Research Center in Prince George's County, Maryland. It is our understanding that BEP is the lead-agency for this undertaking with the Agricultural Research Service (ARS) also participating and that the US Army Corps of Engineers (USACE), Baltimore District, is acting as a federal contracting agency. Should the BEP, as part of its responsibilities under Section 106 of the National Historic Preservation Act (NHPA) and the regulations of the ACHP, "Protection of Historic Properties" (36 CFR Part 800), reach a determination of adverse effect, in consultation with the Maryland and Washington D.C. SHPOs, tribes, and other consulting parties, please invite the ACHP to participate at that time, pursuant 36CFR800.6(a)(1). The ACHP recommends BEP utilize our Electronic Section 106 Documentation Submittal System (e106) to notify us formally of an adverse effect finding. All the information can be found on our site at: Blocked<https://www.achp.gov/e106-email-form> Additionally, Mr. Chris Wilson, is the Office of Federal Agency Programs Program Analyst assigned to BEP and Ms. Alexis Clark, the Historic Preservation Specialist assigned to ARS. Please include them on any future communication.

Sincerely,

Christopher Daniel (he/him/his)

Program Analyst

Advisory Council on Historic Preservation

401 F Street NW, Suite 308, Washington, DC 20001

(Office & Mobile)

COVID-19 and the ACHP. The ACHP staff is teleworking and available by e-mail and phone. Up to date information on Section 106 and ACHP operations can be found at Blockedhttps://urldefense.proofpoint.com/v2/url?u=http-3A__www.achp.gov_coronavirus&d=DwIF-g&c=TQzoP61-bYDBLzNd0XmHrw&r=zzAbBeA11El8yfQDm-08treReXUtR85lgbuDVdtwaiU&m=6nt6wornFmJc1xjiTb5vaftpS7umIJXPmvVfDCiCZhA&s=-_P2yG9DmKMzLA_Jd7p1qOwrp2DiAbE5aNHJP1aLwBs&e= .
e106-online section 106 documentation submittal system Blocked<https://www.achp.gov/e106-email-form>



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

December 21, 2020

Mr. Harvey Johnson
U.S. Army Corps of Engineers, Baltimore District
Programs and Project Management Division
2 Hopkins Plaza, 10th Floor
Baltimore, Maryland 21201

RE: Draft Environmental Impact Statement for the Bureau of Engraving and Printing Construction and Operation of a Replacement Currency Production Facility, Beltsville, Maryland; CEQ #20200218

Dear Mr. Johnson:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act, and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS or Study) prepared for the U.S. Department of Treasury (Treasury) for the construction and operation of a new Currency Production Facility (CPF) at the Henry A. Wallace Beltsville Agricultural Research Center (BARC) in Prince George's County, Maryland. The facility would replace Bureau of Engraving and Printing's (BEP's) current manufacturing operations in Washington, D.C. The Proposed Action would relocate the new currency project facility to the Central Farm area of BARC.

Thank you for providing the Study for our review. EPA also appreciates the consideration given to our December 13, 2019 scoping comments.

As detailed in the DEIS, the existing current production facility has numerous inefficiencies, lacks flexibility for new production processes required to support currency redesign efforts and does not comply with modern physical security standards. Treasury's need for a replacement facility is clear, but the introduction of the large industrial facility to BARC presents a number of challenges, given the mission, historic nature, and landscape of BARC.

We understand that Congress authorized the U.S. Department of Agriculture (USDA) to transfer this property to Treasury through the Agriculture Improvement Act of 2018. However, as acknowledged in the DEIS, the introduction of the proposed CPF would obstruct the "historically and aesthetically valued vista/viewscape." Further, the construction of a secure manufacturing facility in the historic agricultural research campus presents a use that does not appear to be contemplated by local planning and represents a substantial change for residents and employees. As outlined in the Land Use section and technical report, BARC is generally considered protected land and/or open space in local planning. The proposed industrial use appears to conflict with these plans and zoning. Siting such a facility at this location requires not only careful evaluation of the significance of the impacts, but also consideration of minimization of impacts.

We recognize that Treasury has evaluated measures to reduce impacts; we appreciate the incorporation of Environmental Protection Measures (EPMs), Regulatory Compliance Measures (RCMs), and Best Management Practices (BMPs) to reduce environmental effects. We also appreciate the commitment to obtain a Leadership in Energy and Environmental Design (LEED) rating of Silver for the building. We recommend consideration of additional or expanded measures and specific commitments to reduce potential effects and address local concerns. A number of opportunities exist to reduce the impact of the facility in the landscape; while the EIS indicates that sustainable features will be evaluated for building design, (such as rainwater harvesting system for reuse, rooftop solar panels, and high efficiency systems) additional details and commitments would be helpful. A few suggestions include: restoring additional habitat onsite; sharing conceptual designs that reduce visual effects with the residents in the Region of Influence; reducing the footprint of impervious areas; committing to measures to improve bike and pedestrian access; and ensuring minimal noise and light intrusion outside the site from the facility. Please see additional comments in the attached enclosure.

While the new CPF will be a state-of-the-art manufacturing facility, we recommend that innovation and cutting-edge technology be incorporated into the site design and construction methods. We suggest fully applying the principles of low impact design to limit disturbance and maximize natural infrastructure to reduce the physical and environmental footprint of the facility. Such a design would be more compatible with the mission of BARC to leverage science-based technologies for sustainable systems. We also continue to encourage ongoing community engagement and involvement to address concerns as the design moves forward.

Thank you for the opportunity to review this project and for your consideration of our comments as the EIS is finalized. We would be happy to discuss these comments at your convenience. Please feel free to contact me at 215-814-3402 or Nevshehirlian.Stepan@epa.gov. The Region 3 staff contact for this project is Carrie Traver; she can be reached at 215-814-2772 or Traver.carrie@epa.gov.

Sincerely,

BARBARA Digitally signed by
BARBARA RUDNICK
Date: 2020.12.21
18:12:35 -05'00'

for

Stepan Nevshehirlian
Environmental Assessment Branch Chief
Office of Communities, Tribes & Environmental
Assessment

Technical Comments

Construction and Operation of a Replacement Currency Production Facility DEIS

Alternatives Analysis

Several other federal properties were dismissed as they were less than 100 acres. As parcel size was a critical consideration for site selection, we recommend that the need for a minimum of 100-acre site be further discussed and supported.

The DEIS indicates that Treasury undertook a robust and sequential screening process for suitable sites. Section 2.3 presents a brief overview of that screening process. For transparency, we recommend that additional document(s) outlining the process and the sites considered be referenced or provided.

Two other potential sites were considered at BARC. The East Airfield was dismissed as “USDA identified that the site was recently proposed for another federal use that would conflict with the Proposed Action”. We recommend that this be further explained. It would also be helpful to clarify the plan or strategy used to select potential sites to be excised from BARC.

We recommend that the layout for the facility be discussed in more detail in the Final EIS (FEIS), including the building size, location of the building and parking on the site, required setbacks and constraints, alternative layouts considered, and the alignment of the new entrance road from Powder Mill Road. As discussed under Water Resources, we recommend evaluation of alternatives that minimize impacts to Waters of the US.

Land Use

Land use is an area that requires careful evaluation, as the Proposed Action would permanently convert lands from agricultural production and research to industrial manufacturing. We recommend further consideration of both the Region of Influence (ROI) and the significance of impacts for this resource.

The site is located in the Central Farm section at the northern boundary of BARC. The ROI identified for the land use analysis is the Project Site and areas within one mile. We recommend the FEIS clearly connect the ROI to land use at a local and regional scale. Specifically, we suggest evaluating the impacts in the context of the Central Farm and the adjacent properties, as part of BARC, and in the larger National Capital Region.

We note that the development of lands at BARC does not just represent loss of valuable prime farmland and farmland of statewide importance for agricultural production, but also would permanently eliminate lands for agricultural research, which is not a common use. We recommend expanding the discussion to further address the potential loss of land for agricultural experimentation.

The DEIS indicates that adverse impacts on land use and local planning objectives are less-than-significant, but the Proposed Action conflicts with both current zoning and regional plans. BARC is listed as a Priority Preservation Area and is considered “permanently preserved” in Prince George’s County Priority Preservation Area Functional Master Plan. Plan Prince George’s 2035 - Approved General Plan indicates that sprawl is a serious issue as the County experienced a 6.3 percent decrease in prime agricultural and resource lands between 2002 and 2010 and the loss continues. As described, converting the site to industrial land use would conflict with local plans and associated planning goals. While state and local agencies cannot regulate land use on federal property, the purpose of these plans is to strategically balance land use, including identifying areas to locate future development and growth and to preserve agricultural areas and open spaces. It is recommended that the FEIS acknowledge the

adverse effects and commit to approaches to minimize and mitigate or offset the impacts of the proposed land use change for the region.

As outlined in the Land Use Technical Memorandum, Treasury defined a significant adverse impact as one that would “result in a new land use that would result in discontinuation of or substantial change in existing adjacent land uses, or induced activities within the ROI, but beyond the Project Site, that are inconsistent with existing zoning designation(s).” We recommend reconsideration of this criteria, and clarification of the language and intent. It is unclear how a substantial change in existing land use at the site that conflicts with local zoning and several regional plans does not represent a significant adverse impact on the resource.

Visual Resources

As discussed, the introduction of the proposed CPF may have potentially significant adverse impacts to visual resources for residences along Odell Road and less-than-significant adverse impacts on visual resources from roadways with implementation of EPMs. We concur that mitigation measures as outlined in 3.3.3 and the EPMs in Section 2.2.4 should be implemented to reduce effects during both day and nighttime, including reducing the visual impacts from the security fencing, an exterior lighting plan that minimizes off-site light pollution, retention and enhancement of existing landscape buffers, and a design that selects materials and colors that blend with the existing visual landscape, consistent with input from cultural resource agencies.

The DEIS indicates that Treasury intends to design the proposed CPF using architectural styles that minimize potential adverse impacts to the viewshed. However, the conceptual design shown in the Technical Memorandum appears to be a large, featureless industrial building. As the design progresses, we recommend sharing an updated concept with the public that shows the planned features that will allow it to be more compatible with the existing landscape.

Noise

Section 3.5.1.3 indicates that existing sources of noise are typically associated with residential and agricultural uses, including vehicle traffic, farm equipment, and landscaping equipment. For community residents, increased noise from construction and ongoing increased traffic generally creates annoyance and an overall nuisance affecting quality of life. The increased noise can interfere with conversation or listening to television, impact learning, and disrupt sleep. As noted, differing sound exposure levels vary in terms of the level at which disturbance to individuals may occur. BARC facilities are generally not occupied during nighttime hours, so nighttime noise may be particularly intrusive. Therefore, we recommend further clarifying the measures that will be taken to reduce noise from construction and operation of the CPF and committing to specific measures where possible, particularly during the reconstruction of Poultry Road.

During operation, the DEIS states that equipment would be designed to operate at or below noise thresholds in accordance with the Prince George’s County ordinance. We recommend that the FEIS clarify the likely daytime and nighttime noise levels from the facility, including from support equipment such as emergency generators and heating, ventilation, and air conditioning units. We also recommend evaluating reducing or eliminating heavy truck shipments during late night and early morning when the noise may be disruptive to sleep.

Water Resources

Surface Waters and Water Quality

As indicated, the Proposed Action would increase impervious surface cover by 29.4 acres, comprising 38.2 percent of the Project Site. The DEIS indicates that green infrastructure or low impact development (GI/LID) measures will be used to maintain the pre-development hydrology and stormwater control BMPs will be incorporated; however, at this time only the conceptual location of stormwater facilities is shown.

The substantial increase in impervious surface cover necessitates a suite of BMPs to reduce potential impacts from stormwater discharging to the streams onsite. We encourage incorporation of LID early in the site design. We recommend evaluation of specific measures that would likely be taken to protect water quality, including limiting the disturbance area during construction and reducing the size of the building and parking areas. We continue to recommend consideration of opportunities to minimize the construction of impervious areas associated with the facility such as parking, sidewalks, and roads. Such efforts include construction of multiple floors for office structures, structured or reduced parking, and pervious pavement options for emergency access roads and sidewalk areas. We also continue to recommend specifically addressing pollutants from parking lot runoff and landscaping such as fertilizers and pesticides.

As indicated in Section 3.7.2.2, operation of the proposed CPF would produce approximately 120,000 gallons per day of wastewater that would be treated at the BARC East Wastewater Treatment Plant (WWTP) and discharged to nearby surface waters. We recommend that the potential for increased water volumes downstream of the WWTP, the specific capacity of the WWTP, and associated impacts to streams from the discharge be further supported in the Technical Memorandum.

Wetlands

Six palustrine wetlands totaling 2.94 acres were delineated on the project site. Wetland 4, 7, and 8 were preliminarily determined to be jurisdictional waters subject to regulation under the Clean Water Act (CWA) Section 404 and Wetlands 2, 3, and 6 were isolated wetlands subject to the Maryland Department of the Environment (MDE) regulation. In total, the Proposed Action would impact 0.94 acre of wetlands, including fill of Wetlands 2, 3, 7, and 8, and potential impacts to 0.03 acre of Wetland 4.

We suggest that Treasury consider requirements anticipated for the future CWA 404 permit process. Please consider the following comments from the EPA Region 3 Water Division, Wetlands Branch:

While EPA appreciates that Treasury has made deliberate efforts to minimize impacts and plans on avoiding the placement of structures within Wetland 4, we recommend evaluation of full avoidance of impacts to this wetland. Specifically, we recommend shifting the perimeter fence to avoid impacts or explaining why this is not practicable. If temporary impacts are required for construction, we recommend developing a plan specifying the BMPs and restoration measures that will be taken.

We also recommend further evaluation of avoidance and minimization of impacts to Wetland 7 and 8. The DEIS states that these wetlands are located within the project Limit of Disturbance (LOD) associated with improvements to the existing Powder Mill Road but it is unclear why it is not practicable to avoid or minimize these impacts from information provided. (E.g. could the road be shifted to avoid grading impact, or could wetlands be restored after construction?) We recommend that additional documentation be provided to support the finding that these are unavoidable impacts.

In addition, the DEIS proposes the option of modifying the LOD associated with proposed entrance road upgrades and the proposed vehicle entry control facility as an alternative to diverting 117 linear feet of stream. EPA recommends further evaluation and documentation of the alternatives for the access road to avoid and minimize this impact to the extent practicable.

Once it is determined that the applicant has taken all appropriate and practicable steps to avoid and minimize adverse impacts, compensatory mitigation is then considered. EPA recommends that a compensatory mitigation plan be developed for unavoidable impacts to jurisdictional waters. We also recommend further consultation with MDE regarding appropriate mitigation for the impacts to state-regulated wetlands and buffers.

Additionally, to determine appropriate mitigation, it would be helpful to include an assessment of the impacted wetlands' functions and quality. As part of the overall site design, we also suggest evaluating opportunities to enhance the quality and functioning of stream and wetland resources onsite or in the vicinity, including enhancing native vegetation in wetlands and/or managing invasive species.

Biological Resources

For wildlife, the selection of the ROI would benefit from consideration at multiple scales. For direct impacts to fauna such as noise and light, the ROI for biological resources (the Project Site and areas within 1,500 feet) seems logical. However, it would be more informative to consider effects to vegetation and habitat at both local and landscape scales.

We recommend that the assessment of biological resources be expanded, using more detailed data to assess and support the determination of significance and to identify appropriate minimization or mitigation measures. Specifically, we recommend that the analysis include more detail on impacts to bird species and the existing habitat onsite. Although access is restricted, BARC is clearly of interest to birders in the region. The DEIS indicates that 12 species of Birds of Conservation Concern have been observed, with 8 being reported within the ROI. There is an [eBird hotspot](#) at BARC, and 239 species have been reported to date. The Birders Guide to Maryland and D.C. includes BARC, and states that during the several annual opportunities when special permission is given to bird (the Audubon Christmas Bird Count and the Maryland Ornithological Society's Spring and Fall Counts), BARC "is highly prized" and "a highly desirable territory."

Onsite, 63.6 acres of the habitat is characterized as meadows and scattered trees, but a more detailed assessment would be helpful. Section 1.2.3.2 of the technical report states that wildlife that favor forest edge habitats include species of birds and bats. However, forest edge habitat does not appear to be discussed further. We recommend the FEIS specifically address the habitat types and vegetation in relation to species that may use the site and ROI.

We appreciate that bird collision deterrence options would be assessed during the building and design process and noise and light abatement or shielding features would be incorporated into the design of the proposed CPF.

Forest retention or reforestation areas are to be located outside of the construction LOD. Section 3.8.2. indicates that Treasury would revegetate the area disturbed during construction primarily with maintained lawn. As acknowledged, this approximately 47.3-acre area would have minimal habitat value. Instead, we recommend that Treasury propose reduction of impacts by revegetating much of this area with native species. While higher vegetation may present concerns for security, maintained

meadow areas may provide clear sight lines and pleasing aesthetics along with habitat. For example, Treasury could work with USDA and other resource agencies to design appropriate vegetation and develop a management plan for meadow areas for songbirds and pollinators. Once established, dense native vegetation will aid in stormwater management and infiltration, and will likely reduce costs associated with grounds maintenance (e.g. reduced mowing, irrigation, fertilizer, etc.)

We recommend consideration of wetland creation areas for stormwater management onsite and that the stormwater management be constructed and maintained to provide wildlife habitat value.

The FEIS would benefit from a discussion of the potential for dispersal of invasive species during construction and landscape maintenance and avoidance or mitigation actions.

Cultural Resources

The Project Site is located within the BARC Historic District. Demolition of the 22 contributing resources and construction of the proposed CPF, would result in diminished integrity of the BARC Historic District's design, setting, materials, workmanship, and feeling. It is our understanding that consultation with Maryland Historic Trust is ongoing to reduce these adverse effects to less-than-significant levels. We recommend that the FEIS be updated regarding consultation and include the draft or final Memorandum of Agreement (MOA) or Programmatic Agreement (PA).

Utilities

The DEIS indicates that existing utility infrastructure at the Project Site would be removed and replaced. We recommend clarifying if any additional tree removal, aquatic resource impacts, or other impacts to other resources are associated with these upgrades and connections.

Hazardous Wastes and Waste and Pollution Prevention

As the site plan is developed, we recommend further detail regarding hazardous waste handling be added to the Technical Memorandum, including: operational controls and plans to prevent and address potential discharges or spills during operation of the facility; training given to personnel involved in operations that involve use, storage, transport of toxic substances; and offsite treatment and disposal locations. It is important that the public have the opportunity to review pollution prevention planning, compliance with federal and state regulations, and other steps to protect human health and the environment. We recommend the FEIS specify the documents that will be available to the public and anticipated communication to notify neighbors of project developments and receive public input.

Human Health and Safety

We encourage efforts to improve pedestrian and bike access to the site and in the vicinity. Greenspaces, including bike paths, walking paths, and trails provide increased opportunities for active lifestyles as well as enhancing aesthetics and providing stormwater management benefits. Exposure to green space has positive physical and mental health benefits. We encourage maximizing opportunities to incorporate greenspace into the project area and surrounding areas to the extent feasible.

Traffic is a source of air pollution such as ozone, particle pollution, and air toxics. The health effects of mobile source air pollution affect millions of people, especially those who live near busy roads. Reduction of traffic impacts where possible, along with greenspace enhancements such as roadside vegetation can reduce impacts to local communities.

Environmental Justice

As the DEIS indicates, it appears that the ROI is an area of potential Environmental Justice (EJ) concern. We recommend that the FEIS more clearly assess the individual block groups within the ROI, in addition to summarizing the data at the ROI level. The ROI summary level data are important from a comparative baseline perspective, but it is also important to try to identify the smaller, potentially underrepresented communities that may be overlooked when assessing a wide area. For example, communities with high percentages of linguistic isolation are better identified at block group level. This type of assessment can help better tailor the community involvement and outreach strategy.

Socioeconomic Impacts

Section 3.12.2.2 indicates that nearby property values may decrease slightly as a result of the proposed CPF. We recommend further analysis of potential impacts to housing and property values for properties along Odell Road using data from similar projects.

Traffic and Transportation

It is anticipated that the majority of personnel will drive in single-occupancy vehicles, adding to congestion in the surrounding transportation network and creating the demand for a large parking area onsite. We encourage working with partners like the Washington Metropolitan Area Transit Authority to enhance public transit access to the site and to provide incentives for transit and ride sharing. We recommend developing a Transportation Management Plan for the facility to evaluate strategies to reduce use of single occupancy vehicles and encourage reduction of the need for parking.

As indicated above, we recommend incorporating pedestrian and bicycle amenities into the Preferred Alternative to provide better access to the site and as an improvement for local residents.

Cumulative Effects

We recommend that the discussion of cumulative effects (Chapter 4) include a narrative that clearly describes the expected effects from projects that are planned or likely at BARC, including the High-Speed Superconducting Magnetic Levitation System (MAGLEV) and the solar array development (Section 4.4). If MAGLEV facilities are located at BARC, a range of resources may be impacted. We suggest that the FEIS include updated information on anticipated projects, such as the planned MAGLEV corridor and maintenance yard and other reasonably foreseeable projects.

Public Involvement and Outreach

As indicated in our comments, we encourage further communication with neighbors and stakeholders throughout facility design, construction, and operation. We recommend that the FEIS include a discussion of additional community outreach efforts, including whether a communication plan will be developed.

NCPC File No. 8243

December 21, 2021

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

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

Dear Mr. Johnson:

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

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

NCPC staff is generally supportive of the preferred alternative in the DEIS which includes a one million-square-foot facility on a 100-acre parcel within the BARC campus; however, we also acknowledge that this project will move approximately 1500 federal jobs from the District to Maryland. The Federal Workplace Element of the Comprehensive Plan includes policies that support maintaining a majority of the region's federal employees within the District. While this move will not single handedly change that overall distribution, it will reduce the number of jobs in the District. Based on the DEIS, NCPC staff understands the Department of Treasury's decision to relocate to Maryland was based on the need to improve the existing currency production inefficiencies that are a result of operating in the constrained multi-floor historic site downtown.

The requirements to modernize and make currency production more efficient include: a 100-acre parcel for the new facility, and the need for easy access to both highways and aviation networks. Given the change in location from the District to Maryland, NCPC will use the NEPA analysis to inform its review of the project and thereby requests that the DEIS adequately analyze impacts related to existing conditions and the proposed location. NCPC staff further note that every effort should be made to minimize impacts associated with the move to a less publicly accessible site and the change in land use at the BARC Campus. Our comments below focus on potential transportation, historic preservation, and natural resource impacts.

Transportation

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

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

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

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

environmental impacts including heat island, impervious surface, tree removal, and stormwater runoff related to a surface lot verses structured/below grade parking.

Historic Preservation

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

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

Natural Resources

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

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

Coordination

Overall, staff understands the space requirements for this facility are significant and they limit the potential available sites in the NCR. The DEIS describes that BARC offered the only site that met the size requirements and was accessible to highways and airports. Given this a more intensive land use from the existing condition, we encourage the Department of Treasury and USACE to continue coordination with the local jurisdiction and adjacent neighborhood along Odell Road to identify additional mitigation measures to reduce the visual and transportation impacts.

These comments have been prepared in accordance with NCPc's Transportation, Environmental and Historic Preservation Policies and Procedures. We refer the Department of Treasury to NCPc's Comprehensive Plan for the National Capital to reference policies and guidelines for which this project will be evaluated against. The Comprehensive Plan and other NCPc plans/policies can be found on our website at www.ncpc.gov; hard copies are available if needed. Please feel free to contact Carlton Hart, the point of contact for this project, at 202-482-7252 or carlton.hart@ncpc.gov.

Sincerely,

Diane Sullivan

Diane Sullivan

Director, Urban Design and Plan Review Division

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State Agency Comments

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Maryland DEPARTMENT OF PLANNING

November 10, 2020

Mr. Harvey Johnson, Programs and Project Management, Planning
U.S. Army Corps of Engineers, Baltimore District
2 Hopkins Plaza, 10th Floor
Baltimore, MD 21203-1715

STATE CLEARINGHOUSE REVIEW PROCESS

State Application Identifier: MD20201106-0959

Reviewer Comments Due By: December 7, 2020

Project Description: Draft Environmental Impact Statement (EIS) and Draft Finding of No Practicable Alternative (FONPA): Proposed Action Includes Construction and Operation of a Replacement Currency Production Facility at the Beltsville Agricultural Research Center (BARC), Prince George's County, MD

Project Address: BARC Central Farm, 200 Building Cluster, Odell Road, Powder Mill Road, Poultry Road, Beltsville, MD 20705

Project Location: Prince George's County

Clearinghouse Contact: Sylvia Mosser

Dear Mr. Johnson:

Thank you for submitting your project for intergovernmental review. Participation in the Maryland Intergovernmental Review and Coordination (MIRC) process helps ensure project consistency with plans, programs, and objectives of State agencies and local governments. MIRC enhances opportunities for approval and/or funding and minimizes delays by resolving issues before project implementation.

Maryland Gubernatorial Executive Order 01.01.1998.04, Smart Growth and Neighborhood Conservation Policy, encourages federal agencies to adopt flexible standards that support "Smart Growth." In addition, Federal Executive Order 12072, Federal Space Management, directs federal agencies to locate facilities in urban areas. Consideration of these two Orders should be taken prior to making final site selections. A copy of Maryland Gubernatorial Executive Order 01.01.1998.04, Smart Growth and Neighborhood Conservation Policy is available upon request.

We have forwarded your project to the following agencies and/or jurisdictions for their review and comments: the Maryland Departments of Natural Resources, the Environment, Transportation, General Services, and Agriculture; Prince George's County; the Maryland-National Capital Park and Planning Commission in Prince George's County; and the Maryland Department of Planning, including the Maryland Historical Trust. A composite review and recommendation letter will be sent to you by the reply due date. Your project has been assigned a unique State

Mr. Harvey Johnson

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State Application Identifier #: MD20201106-0959

Application Identifier that you should use on all documents and correspondence. Please be assured that we will expeditiously process your project.

If you need assistance or have questions, contact the State Clearinghouse staff noted above at 410-767-4490 or through e-mail at sylvia.mosser@maryland.gov. Thank you for your cooperation with the MIRC process.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J Dubow', with a stylized flourish at the end.

Jason Dubow, Manager
Resource Conservation and Management

JD:SM

20-0959_NFP_NEW.docx

-----Original Message-----

From: Wilson, Brian [mailto: [REDACTED]]

Sent: Tuesday, December 1, 2020 5:00 PM

To: BEP-EIS <BEP-EIS@usace.army.mil>

Subject: [Non-DoD Source] Beltsville Currency Facility

To Whom it May Concern,

Please be advised that the proposed facility will be subject to the Prince George's County mandatory referral process once the applicant is ready to submit for formal site plan approval. Please contact Prince George's County Planning Special Projects Section for further information.

Thank you,

Brian Wilson, AICP



LARRY HOGAN
GOVERNOR

STATE OF MARYLAND
OFFICE OF THE GOVERNOR

December 7, 2020

Mr. Harvey Johnson
U.S. Army Corps of Engineers, Baltimore District
Programs and Project Management Division
2 Hopkins Plaza, 10th Floor
Baltimore, MD 21201

Re: Comments for the National Environmental Policy Act (NEPA) Draft Environmental Impact Statement (DEIS) for the proposed relocation of the Bureau of Engraving and Printing's (BEP) Currency Production Facility to the Beltsville Agricultural Research Center (BARC)

Dear Mr. Johnson:

On behalf of the State of Maryland, I write to you today in strong support of the proposed relocation of the Bureau of Engraving and Printing's replacement currency production facility to the USDA Beltsville Agricultural Research Center (BARC) located in Prince George's County, Maryland, which would move 1,600 highly skilled employees to our great state.

The additional infusion of workforce would have a significant impact on our economy, spurring additional investment in the area while supporting the County's goal of regional redevelopment. Maryland has a long history of manufacturing and is working hard to maintain and grow this industry sector. Additionally, taxpayers will benefit from the construction of a new technologically advanced facility, thereby reducing the cost of rehabilitation of the aged production facilities.

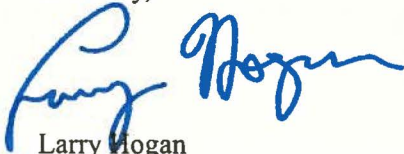
Locating the new facility on the 6,500-acre BARC campus addresses several key needs of the Bureau, including transportation and workforce. With its central location adjacent to major roads and highways as well as airports, the BARC campus offers ease of transportation of raw materials as well as finished products. In addition, this location will help retain the Bureau's highly skilled workforce and attract new workers, as 65 percent of the current workforce resides in Maryland with 43 percent living locally in Prince George's County.

We recognize the impact the federal sector has on Maryland's economy and are committed to maintaining a strong federal-state partnership. As consideration for relocation continues to move forward, Maryland's state agencies stand ready to collaborate with project stakeholders to assist in the development of a

facility that provides for the needs of the Bureau of Engraving and Printing and promotes economic development in the surrounding region, while mitigating any potential adverse impacts from the project.

Thank you for considering Maryland for the new Bureau of Engraving and Printing location. We are happy to provide support to the U.S. Army Corps of Engineers, Baltimore District throughout the development process. If you have any questions or need additional information, please reach out to Helga Weschke, Director of Federal Business Relations at the Maryland Department of Commerce (Helga.Weschke@maryland.gov).

Sincerely,



Larry Hogan
Governor

CC: Secretary Kelly Schulz, Maryland Department of Commerce
Secretary Gregory Slater, Maryland Department of Transportation
Secretary Ben Grumbles, Maryland Department of the Environment
Secretary, Jeannie Haddaway-Riccio, Maryland Department of Natural Resources
Secretary Tiffany P. Robinson, Maryland Department of Labor
County Executive Angela D. Alsobrooks, Prince George's County
Helga Weschke, Director, Federal Business Relations, Maryland Department of Commerce
David Iannucci, President and CEO, Prince George's County Economic Development Corporation



Maryland DEPARTMENT OF PLANNING

December 17, 2020

Mr. Harvey Johnson, Programs and Project Management, Planning
U.S. Army Corps of Engineers, Baltimore District
2 Hopkins Plaza, 10th Floor
Baltimore, MD 21203-1715

STATE CLEARINGHOUSE RECOMMENDATION

State Application Identifier: MD20201106-0959

Applicant: U.S. Army Corps of Engineers, Baltimore District

Project Description: Draft Environmental Impact Statement (EIS) and Draft Finding of No Practicable Alternative (FONPA): Proposed Action Includes Construction and Operation of a Replacement Currency Production Facility at the Beltsville Agricultural Research Center (BARC), Prince George's County, MD

Project Address: BARC Central Farm, 200 Building Cluster, Odell Road, Powder Mill Road, Poultry Road, Beltsville, MD 20705

Project Location: Prince George's County

Recommendation: Consistent with Qualifying Comments and Contingent Upon Certain Actions

Dear Mr. Johnson:

In accordance with Presidential Executive Order 12372 and Code of Maryland Regulation 34.02.02.04-.07, the State Clearinghouse has coordinated the intergovernmental review of the referenced project. This letter constitutes the State process review and recommendation.

Review comments were requested from the Maryland Departments of Agriculture, General Services, Natural Resources, Transportation, and the Environment; Prince George's County; the Maryland National Capital Parks and Planning Commission - Prince George's County; and the Maryland Department of Planning, including the Maryland Historical Trust. The Maryland Department of Agriculture did not have comments.

The Maryland Departments of General Services, and Natural Resources; Prince George's County; the Maryland National Capital Parks and Planning Commission - Prince George's County; and the Maryland Department of Planning found this project to be consistent with their plans, programs, and objectives.

The Maryland Department of Planning provided the following comments:

“The Draft Environmental Impact Statement is for the Bureau of Engraving and Printing, Currency Production Facility preferred location within the Beltsville Agricultural Research Center. This facility will replace the existing facility located in downtown Washington D.C., which has been deemed obsolete. The project will ultimately transition approximately 1600 personnel to the Prince George's County location. This is consistent with Plan Prince George's 2035 General Plan in regard to establishing an

Mr. Harvey Johnson

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State Application Identifier: **MD20201106-0959**

Innovation Corridor to include the Beltsville Agricultural Research Center. ‘This area has the highest concentrations of economic activity in our four targeted industry clusters and has the greatest potential to catalyze future job growth, research, and innovation in the near- to mid-term. This area is also well positioned to capitalize on the synergies that derive from businesses, research institutions, and incubators locating in close proximity to one another and on existing and planned transportation investment, such as the Purple Line.’ (<http://planpgc2035.org/202/Innovation-Corridor>).”

The Maryland National Capital Parks and Planning Commission - Prince George's County (M-NCPPC) provided the following comments:

“The U.S. Army Corps of Engineers, Baltimore District on behalf the U.S. Department of Treasury requests Clearinghouse review and endorsement of the BARC proposal for the construction of a new currency facility. As this is a Federally owned and operated property, the project is not subject to the county’s local building and grading regulations. Additionally, M-NCPPC does not have regulatory jurisdiction over activities, development or otherwise, within the boundary of the property. Staff defers to Maryland Department of the Environment and U.S. Army Corps of Engineers to ensure that all state and federal regulations are being followed and meets the regulatory standards of the Clean Water Act.”

Prince George's County provided the following comments:

“A review of floodplain maps derived from the County’s watershed studies and the FEMA [Federal Emergency Management Agency] flood insurance study reveals no delineated floodplain on the subject site. However, this review also revealed defined drainage courses for which a floodplain may exist but has yet to be determined. It’s recommended that the site developer submit the project development plan to the County’s Department of Permitting, Inspection and Enforcement (DPIE) for review and guidance on permit requirements.”

The Maryland Department of Transportation (MDOT) found this project to be generally consistent with their plans, programs, and objectives, but included certain qualifying comments summarized below.

- “Powder Mill Road is a popular route for cycling. As proposed, the Replacement Currency Production Facility does not appear to inordinately effect cyclist safety.
- The addition of bus stops (with a shelter) near the proposed printing facility should be considered for the provision of alternative modal choices for staff commuting to and from the facility.
- Because the peak hours studied of the proposed facility do not overlap with local peak-hours, proposed mitigation may be insufficient to address future build-year local peak-hour congestion.
- The site of the proposed facility is located just east of the Powder Mill Road intersection at MD 201 (Kenilworth Avenue), which is located within the limits of the MD 201 Extended/US 1 Corridor (I-95/I-495 to North of Muirkirk Road) Planning Study, a study of capacity improvements in the MD 201 and US 1 corridors. This study remains on hold pending identification to complete planning. For additional information concerning potential impacts from proposed alternatives, please contact Barry Kiedrowski, P.E., MDOT SHA [State Highway Administration] Project Management Chief, at 410-545-8769 or via email at bkeidrowski@mdot.maryland.gov.
- Comment from OE: Based on a review of the included information, the nearest identifiable asset, Powder Mill Road, lies within the proposed construction area, although MDOT SHA maintenance of Powder Mill Road ends at the Edmonston Road intersection, approximately 3,000-feet west of the proposed limits of disturbance. A traffic study included in the DEIS, however, identifies significant impacts to traffic congestion at eight intersections (Edmonston Road and Sunnyside Avenue/Beaver Dam Road, Powder Mill Road and Odell Road; Powder Mille Road and Soil Conservation

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Road/Baltimore Washington Parkway NB/SB [northbound/southbound] and Springfield Road) that fail current level of service requirements under peak conditions. No public transport services link directly to this site. Additional coordination with MDOT SHA is recommended to review changing traffic patterns, volumes and interchange needs once formal plans are developed.”

The Maryland Historical Trust stated that their finding of consistency is contingent upon the applicant's completion of the review process required under Section 106 of the National Historic Preservation Act, as follows:

“The Bureau of Engraving and Printing and the Corps of Engineers are continuing consultation with the Maryland Historical Trust and other consulting parties to complete the project's historic preservation review pursuant to Section 106 of the National Historic Preservation Act and resolve the undertaking's adverse effects on historic properties and negotiate a Memorandum of Agreement, prior to finalizing the EIS.”

The Maryland Department of the Environment (MDE) stated that their finding of consistency is contingent upon the applicant taking the actions summarized below.

1. “Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and maintained in accordance with applicable State and federal laws and regulations. Underground storage tanks must be registered and the installation must be conducted and performed by a contractor certified to install underground storage tanks by the Land and Materials Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.
2. If the proposed project involves demolition – Any above ground or underground petroleum storage tanks that may be on site must have contents and tanks along with any contamination removed. Please contact the Oil Control Program at (410) 537-3442 for additional information.
3. Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste activities and contact the Resource Management Program at (410) 537-3314 for additional information regarding recycling activities.
4. The Resource Management Program should be contacted directly at (410) 537-3314 by those facilities which generate or propose to generate or handle hazardous wastes to ensure these activities are being conducted in compliance with applicable State and federal laws and regulations. The Program should also be contacted prior to construction activities to ensure that the treatment, storage or disposal of hazardous wastes and low-level radioactive wastes at the facility will be conducted in compliance with applicable State and federal laws and regulations.
5. The proposed project may involve rehabilitation, redevelopment, revitalization, or property acquisition of commercial, industrial property. Accordingly, MDE's Brownfields Site Assessment and Voluntary Cleanup Programs (VCP) may provide valuable assistance to you in this project. These programs involve environmental site assessment in accordance with accepted industry and financial institution standards for property transfer. For specific information about these programs and eligibility, please contact the Land Restoration Program at (410) 537-3437.
6. Borrow areas used to provide clean earth back fill material may require a surface mine permit. Disposal of excess cut material at a surface mine may require site approval. Contact the Mining Program at (410) 537-3557 for further details.
7. Additional comments from the Water and Science Administration were emailed to Sylvia Mosser [enclosed].”

The State Application Identifier Number must be placed on any correspondence pertaining to this project.

Mr. Harvey Johnson
December 17, 2020
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State Application Identifier: **MD20201106-0959**

Please remember, you must comply with all applicable state and local laws and regulations. If you need assistance or have questions, contact the State Clearinghouse staff person noted above at 410-767-4490 or through e-mail at sylvia.mosser@maryland.gov.

Thank you for your cooperation with the MIRC process.

Sincerely,



Myra Barnes, Lead Clearinghouse Coordinator

MB:SM

Enclosures—MDE Additional Comments

cc:

Tony Redman - DNR
Amanda Redniles - MDE
Ian Beam - MDOT

Tania Rucci - DGS
Denise Burrell - MDA
Kathleen Herbert - PGEO

Ivy Thompson - MNCPPCP
Joseph Griffiths - MDPPL
Beth Cole - MHT

20-0959_CRR_CLS.docx

Construction Stormwater Antidegradation Checklist – Version 1.1

This checklist is intended to be used as guidance for evaluating any portion of your construction site that is located with a watershed that is identified by the Department¹ or the EPA, as a Tier II for antidegradation purposes. This Checklist² is acceptable for use in documenting your antidegradation review and ensuring protection of Tier II resources during construction. This form, or other appropriate written evaluation, may be uploaded with your NOI or provided to the Industrial Stormwater Permits Division at the Maryland Department of the Environment. The information provided to the Department addressing the antidegradation review shall be clearly marked on the erosion and sediment control (E&SC) plan and approved by the appropriate approval authority pursuant to COMAR 26.17.01.

Project Name: _____ General Permit Number (MD): _____ OR, if not available, County or State ESC Plan Identifier: _____ County: _____ Site Map # _____ Parcel # _____ Applicant Signature: _____ Date Complete: _____	
Do all Tier II watersheds impacted by the proposed activity have assimilative capacity⁽¹⁾? If the proposed activity is to a stream segment which doesn't have assimilative capacity, you will need to consult with the Department's Tier II staff on available options and list the findings here. Comments: _____ _____ _____	Yes/No
Were any waivers granted by the Approval Authority for stormwater controls for this project? For projects in Tier II watersheds, waivers need to be fully justified in light of the potential to impact water quality. A waiver that was granted that could lead to degradation would require modeling or other evidence that the lack of stormwater controls will not impact the receiving waters.	Yes/No
Verify whether you will meet the following minimum Stabilization Criteria. After initial soil disturbance or redisturbance, permanent (2011 ESC Handbook Section B-4-5) or temporary (2011 ESC Handbook Section B-4-4) stabilization is required within: <ul style="list-style-type: none"> i. Three (3) calendar days as to the surface of all perimeter controls, dikes, swales, ditches, perimeter slopes, and all slopes steeper than 3 horizontal to 1 vertical (3:1); and ii. Seven (7) calendar days as to all other disturbed areas on the project site except for those areas under active grading. 	Yes/No

¹ Use the interactive Tier II webmap located at: <https://mde.maryland.gov/programs/Water/TMDL/WaterQualityStandards/Pages/HighQualityWatersMap.aspx> to assist you. On the map, Tier II watersheds colored orange have NO assimilative capacity.

² Alternative forms may be approved by the Department, if they contain the information in this checklist.

<p>Verify Increased Inspection Frequency for activity within Tier II Watershed. For any portion of the site that discharges to a water that is identified by the Department as Tier II for antidegradation purposes, more frequent inspections are beneficial. Will you inspect at least once every four (4) calendar days?</p>	<p>Yes/No</p>
<p>Verify Piles are located outside the Stream Protection Zone. For stockpiles or land clearing debris piles composed, in whole or in part, of sediment and/or soil (2011 ESC Handbook Section B-4-8), locate the piles outside of any Stream Protection Zones.</p>	<p>Yes/No</p>
<p>Were there any E&SC exemptions to the requirements for Protections in the Stream Protection Zone below? Note: The list of potential exemptions are listed at the end of this checklist. If exemptions were applicable make sure to include them in the plan.</p> <p>Comments: _____ _____ _____</p>	<p>Yes/No</p>
<p>Have you Verified your Stream Protection Zone Considerations below? All additional controls selected in Compliance Alternative 2, to meet the Stream Protection Zone Considerations below shall be clearly marked on the erosion and sediment control (E&SC) plan and approved by the appropriate approval authority pursuant to COMAR 26.17.01. You are required to document in your E&SC plan where the natural buffer width that is retained (where you are implementing alternative 1 below) and you must document the reduced width of the buffer you will be retaining and document the additional erosion and sediment controls you will use (where you will be implementing alternative 2 below).</p> <p>Comments: _____ _____ _____</p>	<p>Yes/No</p>
<p>Stream Protection Zone Alternative 1: Provide and maintain an undisturbed natural buffer within the Stream Protection Zone (an average of 100 feet from edge of stream).</p> <p>Comments: _____ _____ _____</p>	<p>Yes/No</p>
<p>Stream Protection Zone Alternative 2: Provide and maintain an undisturbed natural buffer that is less than an average of 100 feet and is supplemented by additional erosion and sediment controls. The acceptable additional erosion and sediment controls include, but are not limited to, those listed in the 2011 ESC Handbook. Those controls are accelerated stabilization, redundant controls, upgraded controls, passive or active chemical treatment, or a reduction in the size of the grading unit. These options are provided below, which are the controls that must be considered and, once selected, implemented when construction activity occurs within these Stream Protection Zones. The local approval authorities may provide additional options that provide similar protection. Check each that apply below.</p> <p>Comments: _____ _____ _____ _____</p>	<p>Yes/No</p>

a: Accelerated Stabilization Requirements

Earth disturbance must be stabilized as soon as possible and as dictated by the approved plan (e.g., seed and mulch, soil stabilization matting, rip rap, sod, pavement):

- At a minimum, all perimeter controls (e.g., earth dikes, sediment traps) and slopes steeper than 3:1 require stabilization within three calendar days and all other disturbed areas within seven calendar days
- Accelerated stabilization (e.g., same day stabilization) may be required based on site characteristics or as specified by the approval authority

Comments: _____

b: Redundant Controls

Runoff must pass through two sediment control devices in series. The following are examples of possible combinations:

- When dewatering sump areas or sediment traps or basins, discharge sediment laden water first to a portable sediment tank and then a filter bag
- Install parallel rows of a perimeter filtering control or a combination thereof of silt fence, super silt fence, and filter logs (e.g., two rows of parallel silt fence or a row of filter log parallel to a row of super silt fence)

Comments: _____

c: Upgrade Controls

The following are examples of possible upgrades:

- Upgrade from silt fence to super silt fence
- Upgrade from temporary stone outlet structure to temporary gabion outlet structure
- Upgrade all sediment traps and basins to control additional storage volume; increase the required storage volume from 3,600 cubic feet/acre to 5,400 cubic feet/acre
- Upgrade standard inlet protection type A to type B and at grade inlet protection to gabion inlet protection

Comments: _____

d: Passive or Active Chemical Treatment

The use of chemical additives requires permit coverage and considerations related to potential aquatic toxicity. <https://mdewwp.page.link/ChemAddReview>.

Comments: _____

e: Reduction in the Size of the Grading Unit

- Require grading unit limitations to 10 acres of earth disturbance inside the Stream Protection Zone
- Require grading unit limitations to 20 acres for any earth disturbance that is adjacent to and contiguous with earth disturbances inside the Stream Protection Zone

Comments: _____

f: Prerogative of Approval Authorities

The additional controls described above for projects in Stream Protection Zones are examples of accelerated stabilization, redundant controls, upgraded controls, passive or active chemical treatment, or a reduction in the size of the grading unit. Approval authorities may use these examples as a guide when approving projects, but may also apply further erosion and sediment control measures based on local site conditions and best professional judgement.

Comments: _____

Exemptions to the requirements for Protections in the Stream Protection Zone:

- The following disturbances within the Stream Protection Zone are exempt from the requirements this guidance:- Construction approved under a CWA Section 404 permit; or- Construction of a water-dependent structure or water access areas (e.g., pier, boat ramp, trail).
- If there is no discharge of stormwater to Waters of this State through the area between the disturbed portions of the site and receiving waters, you are not required to comply with the requirements in this guidance. This includes situations where you have implemented controls measures, such as a berm or other barrier, which will prevent such discharges.
- Where no natural buffer exists due to preexisting development disturbances (e.g., structures, impervious surfaces) that occurred prior to the initiation of planning for the current development of the site, you are not required to comply with the requirements in this guidance.

Where some natural buffer exists but portions of the area within the Stream Protection Zone are occupied by preexisting development disturbances, you are required to comply with the requirements in this guidance. Clarity about how to implement the compliance alternatives for these situations is provided upon request from the Department.

- For “linear construction sites” , you are not required to comply with this requirement if site constraints (e.g., limited right-of-way) make it infeasible to implement one of the above compliance alternatives, provided that, to the extent feasible, you limit disturbances within Stream Protection Zone. You must also document in the Checklist your rationale for why it is infeasible for you to implement one of the above compliance alternatives, and describe any buffer width retained and supplemental erosion and sediment controls installed.

**Draft Environmental Impact Statement (EIS) and Draft Finding of No Practicable
Alternative (FONPA): Proposed Action Includes Construction and Operation of a
Replacement Currency Production Facility at the Beltsville Agricultural Research Center
(BARC), Prince George's County, MD**

Maryland Department of the Environment – WSA/IWPP/EASP

**REVIEW FINDING: R2 Contingent Upon Certain Actions
(MD2020 1106-0959)**

Direct any questions regarding the Antidegradation Review to Angel Valdez via email at angel.valdez@maryland.gov, or by phone at 410-537-3606.

Special protections for high-quality waters in the local vicinity, which are identified pursuant to Maryland's anti-degradation policy.

Anti-degradation of Water Quality: Maryland requires special protections for waters of very high quality (Tier II waters). The policies and procedures that govern these special waters are commonly called "anti-degradation policies." This policy states that "proposed amendments to county plans or discharge permits for discharge to Tier II waters that will result in a new, or an increased, permitted annual discharge of pollutants and a potential impact to water quality, shall evaluate alternatives to eliminate or reduce discharges or impacts." Satisfactory completion of the Tier II Antidegradation Review is required to receive numerous State permits, such as those for wastewater treatment, nontidal wetlands disturbance, waterways construction, and coverage under the general construction permit.

The Tier II review is applicable to all portions of the whole and complete project within the Tier II watershed of Beaverdam Creek 2. The review is, at a minimum, a two-step alternatives analysis process. The initial analysis considers if the activity can avoid any impacts to Tier II waters (alternative site or potentially by strategic design). The second analysis considers minimization alternatives to limit associated water quality degradation. This includes BMP considerations for erosion and sediment controls, mitigation for net loss of vital resources such as forest cover, and justification for unavoidable impacts. Under certain circumstances, MDE may require a third analysis which justifies the project based on social or economic rationale.

MDE is revising the overall Tier II review procedures by creating or updating forms to assist with the no-discharge alternatives analysis, minimization analysis, temporary impacts, and social and economic justification. Completion of these forms is required for permitting and other approvals.

[Tier II No-Discharge Analysis Form V1.2:](#)¹

1. Code of Maryland Regulations (COMAR) 26.08.02.04-1 (G(1)) states that “If a Tier II antidegradation review is required, the applicant shall provide an analysis of reasonable alternatives that do not require direct discharge to a Tier II water body (no-discharge alternative). The analysis shall include cost data and estimates to determine the cost effectiveness of the alternatives”.
2. For land disturbing projects that result in permanent land use change, this ‘no discharge’ analysis specifically evaluates the reasonability of other sites or alternate routes which could be developed to meet the project purpose, but are located *outside* of the Tier II watershed. Reasonability considerations, as applicable, may take into account property availability, site constraints, natural resource concerns, size, accessibility, and cost to make the property suitable for the project.
3. This analysis shall be performed regardless of whether or not the applicant has ownership or lease agreements to a preferred property or route.

[Tier II Minimization Alternative Analysis Form V1.1:](#)²

1. Code of Maryland Regulations (COMAR) 26.08.02.04-1 (G(3)) states that “If the Department determines that the alternatives that do not require direct discharge to a Tier II water body are not cost effective, the applicant shall: (a) Provide the Department with plans to configure or structure the discharge to minimize the use of the assimilative capacity of the water body”.
2. This form helps to ensure that water quality impacts due to the proposed project are comprehensively identified, minimized, mitigated, and justified.
3. To demonstrate that appropriate minimization practices have been considered and implemented, applicants must identify any minimization practices used when developing the project, calculate major Tier II resource impacts, consider alternatives for impacts, and adequately justify unavoidable impacts. Further water quality impact minimization such as mitigation or out-of-kind offsets may be required.

[Construction Stormwater Antidegradation Checklist - Version 1.1 :](#)³

1. This form replaces the Tier II checklist, *Enhanced Best Management Practices for Tier II Waters*, distributed in the past.

¹ https://mde.maryland.gov/programs/Water/TMDL/WaterQualityStandards/Documents/Tier-II-Forms/TierII_NoDischargeAnalysis_Form_1.2.pdf

² https://mde.maryland.gov/programs/Water/TMDL/WaterQualityStandards/Documents/Tier-II-Forms/TierII_Minimization_Form_1.1.pdf

³ <https://mde.maryland.gov/programs/Water/TMDL/WaterQualityStandards/Documents/Tier-II-Forms/AntiDegradation%20Checklist%20V1.1.pdf>

2. To complete the checklist, applicants are required to coordinate with the County or appropriate approval authority when developing construction plans and stormwater management plans.

3. Applicants are required to provide this form when seeking a NOI/DOI for coverage under the general construction permit. Other forms and documentation materials shall also be uploaded to the general construction permit site at this time.

Beaverdam Creek 2, which is located within the vicinity of the Project, has been designated as a Tier II stream. The Project is within the Catchment (watershed) of the segment. (See attached map).

Currently, there is assimilative capacity in this watershed; therefore at this time, no detailed social and economic justification is needed.

Planners should be aware of legal obligations related to Tier II waters described in the Code of Maryland Regulations (COMAR) 26.08.02.04 with respect to current and future land use plans. Information on Tier II waters can be obtained online at: <http://www.dsd.state.md.us/comar/comarhtml/26/26.08.02.04.htm> and policy implementation procedures are located at <http://www.dsd.state.md.us/comar/comarhtml/26/26.08.02.04-1.htm>

Planners should also note as described in the Code of Maryland Regulations (COMAR) 26.08.02.04-1(C), "Compilation and Maintenance of the List of High Quality Waters", states that "When the water quality of a water body is better than that required by water quality standards to support the existing and designated uses, the Department shall list the water body as a Tier II water body. *All readily available information may be considered to determine a listing. The Department shall compile and maintain a public list of the waters identified as Tier II waters.*"

The public list is available in PDF from the following MDE website: http://mde.maryland.gov/programs/Water/TMDL/WaterQualityStandards/Documents/Tier_II_Updates/Antidegradation-Tier-II-Data-Table.pdf.

The interactive Tier II webmap is located at the following website: (<https://mdewin64.mde.state.md.us/WSA/TierIIWQ/index.html>).

Direct any questions regarding the Antidegradation Review to Angel Valdez via email at angel.valdez@maryland.gov, or by phone at 410-537-3606.

ADDITIONAL COMMENTS

Stormwater

Planners should consider all Maryland Stormwater Management Controls and during Site Design the planner should consider all Environmental Site Design to the Maximum Extent Practicable and “Green Building” Alternatives. Designs that reduce impervious surface and BMPs that increase runoff infiltration are highly encouraged.

Further Information:

<http://www.mde.state.md.us/programs/water/StormwaterManagementProgram/Pages/swm2007.aspx>

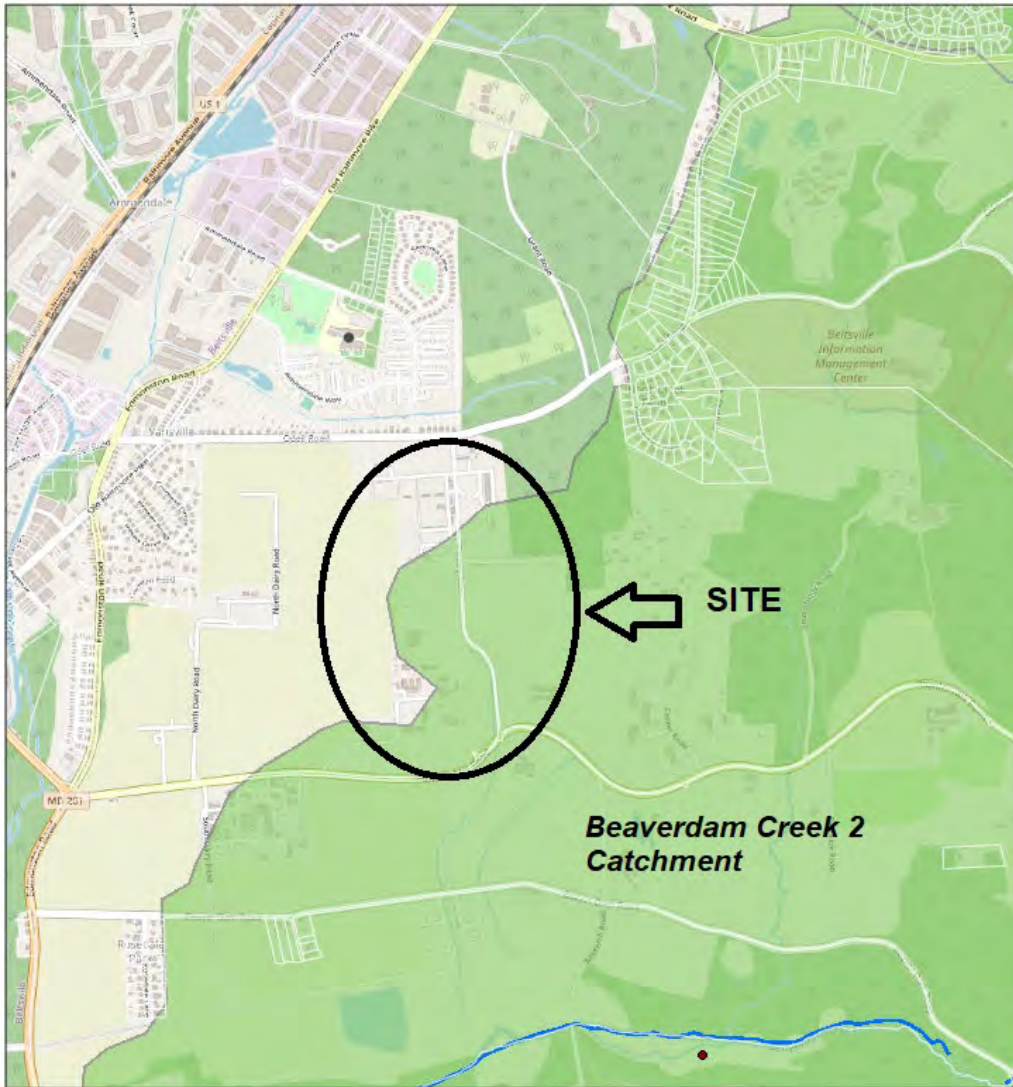
Environmental Site Design (Chapter 5):

<http://www.mde.state.md.us/programs/water/StormwaterManagementProgram/Documents/www.mde.state.md.us/assets/document/Design%20Manual%20Chapter%205%2003%2024%202009.pdf>

Redevelopment Regulations:

<http://www.dsd.state.md.us/comar/comarhtml/26/26.17.02.05.htm>

MD2020 1106-0959

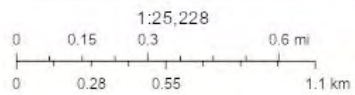


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MD_ParcelBoundaries - Parcel Boundaries

Tier II Catchments 2016

- Assimilative Capacity Remaining
- No Assimilative Capacity Remaining
- Tier II Stream Segments 2016
- Tier II Baseline Stations 2016
- Maryland County Boundaries



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Web AppBuilder for ArcGIS
MDE | Creator: Maryland Department of the Environment, Water and Science Administration (MDE WSA) | MD iMAP, MDP | Map data © OpenStreetMap contributors, CC-BY-SA |



Maryland Department of the Environment

Antidegradation Review Report Form
Alternatives Analysis – Minimization Alternatives



Purpose

This form is designed to help applicants assemble a complete Tier II Review report. This form specifically addresses calculating Tier II resource impacts, and evaluating alternatives that minimize water quality degradation from unavoidable impacts to Tier II watersheds and streams. This analysis is applicable to all areas of the **whole and complete project** within a Tier II watershed.

The Department will use this information to determine whether or not the applicant evaluated all reasonable alternatives to minimize water quality degradation. MDE may provide additional comments, conditions, or requirements, during the course of the review.

Fill in all that apply:

1. **Project Name:** _____

2. **County ESC Plan Identifier:** _____

3. **Nontidal Wetlands & Waterways Construction Tracking Number: 20206_ _ _ _**

4. **General Permit Number:** _____

5. **Other Application Type and Number:** _____

Applicant Signature: _____ **Date Complete:** _____

Background

Code of Maryland Regulations (COMAR) 26.08.02.04-1 (G(3)) states that "If the Department determines that the alternatives that do not require direct discharge to a Tier II water body are not cost effective, the applicant shall: (a) Provide the Department with plans to configure or structure the discharge to minimize the use of the assimilative capacity of the water body".

To demonstrate that appropriate minimization practices have been considered and implemented, applicants must identify any minimization practices used when developing the project, calculate major Tier II resource impacts, consider alternatives for impacts, and adequately justify unavoidable impacts. Further water quality impact minimization such as mitigation or out-of-kind offsets may be required.

Additionally, applicants are required to coordinate with the County or appropriate approval authority when developing construction plans, and incorporate additional practices as indicated by the guidance provided in the *Construction Stormwater Antidegradation Checklist*. This checklist, as well as the other portions of the Tier II Review Report are required prior to receiving many permits and authorizations from MDE.

Instructions and Notes

1. Review all of the information in this document carefully. Prepare a report to address all of the analysis required by this document. Submit all Tier II analysis and documentation together.
2. Do not leave any response blank. Please mark "N/A" for any questions or sections that are not applicable until you reach the end of the document.
3. Provide sufficient supporting documentation for narratives.
4. The level of analysis necessary, and amount of documentation that may be needed to determine if impacts have been adequately addressed, is dependent upon project size, scope, and scale of relative impacts to Tier II resources. Please develop responses accordingly.
5. Reports/responses shall be submitted in electronic format, as well as paper. Full plans are not required unless requested over the course of the review.
6. Direct any questions regarding this form to Angel Valdez at angel.valdez@maryland.gov, or by phone at 410-537-3606.

Minimization Alternative Analysis Final Documentation Checklist

- Signature & Date MDE Tier II Alternatives Analysis – Minimization Alternative form (page 1)
- Resource Impact Analysis (**Complete the analysis for each Tier II watershed affected**)
 - Tier II Stream Buffer Impacts
 - Impact Calculation
 - Impact Minimization
 - Impact Mitigation
 - Impact Justification
 - Stream Buffer Exhibit
 - Forest Cover Impacts
 - Impact Calculation
 - Impact Minimization
 - Impact Mitigation
 - Impact Justification
 - Forest Cover Exhibit
 - Impervious Cover
 - Impact Calculation
 - Impact Minimization
 - Impact Mitigation
 - Impact Justification
 - Impervious Cover Exhibit
 - Mitigation & Other Potential Requirements
 - Plans
 - Signature & Date (Page 8)
- Construction Stormwater Antidegradation Checklist

Tier II Resource Impacts

Sufficient riparian buffers, ample watershed forest cover, and lower levels of impervious cover are essential to maintaining high quality waters. This project may permanently reduce riparian buffers and forest cover, or increase impervious cover within Tier II watersheds leading to a decrease in water quality. Depending upon project specific impacts, MDE may require monitoring, additional BMPs, expanded buffers in Table 1, and other studies prior to approval. This analysis is applicable to all areas of the **whole and complete project** within a Tier II watershed.

MDE will use the following information to determine **permanent** impacts to Tier II watershed resources. Complete the analysis for each Tier II watershed the proposed project may impact.

A. Tier II Stream Buffers

1. Instructions:

- a. If no stream buffer impacts are proposed (within 100' of stream), mark this section N/A and proceed to Section B, Forest Cover.
- b. Insert the Tier II watershed name at the top of each box.
- c. "Impacted" stream segments are those disrupted by road crossings, other infrastructure, construction (ex. sewer lines), or otherwise buried
- d. Calculate buffer averages for 2(f) below on a stream segment-by-segment basis.
- e. Explain in detail alternatives considered, and any actions taken

A. Tier II Stream Buffers - - Tier II Watershed: _____		
2. Calculation of Permanent Riparian Buffer Impacts to State Regulated Waters	Linear Feet +/-	
	LEFT Bank	Right Bank
a. Combined length of on-site stream segments:		
b. Combined length of <u>EXISTING</u> , pre-development, impacted stream segments:		
c. Combined length of <u>PROPOSED</u> , post-development, impacted stream segments:		
d. Total post-development <u>impacted</u> stream segments 2(b) + 2(c) =		
e. Total post-development <u>unimpacted</u> stream segments 2(a) - 2(d) =		
f. Combined length of streams, post-development, with an average 100' buffer, based on the value in 2(e):		
g. Potential Tier II Buffer Impacts 2(e) - 2(f) =		

3. Buffer Impact Minimization:
Evaluate on-site alternatives for buffer impacts for segments identified in 2(g). Examples include minimizing ROW, narrowing paths, alternate routes for walkways, roads, crossings, etc. to avoid buffer impacts.
4. Buffer Impact Mitigation:
Mitigation or offsets can occur both on and off-site. On-site, the intent is to achieve a 100' average stream buffer width. Per segment, locate areas where impacts to the 100' buffer are unavoidable. Include those impacts in the mitigation/offset alternatives analysis. Conditions under section D shall apply. <ul style="list-style-type: none"> a) Evaluate on-site alternatives to identify areas where buffers could be expanded beyond the minimum 100' to offset areas of unavoidable buffer width constraints. b) If there are no on-site areas, evaluate off-site areas, within the Tier II watershed, where buffers could be improved, expanded, or established.
5. Buffer Impact Justification:
If there are any remaining unavoidable impacts, provide narrative justification and supporting documentation for impacts. Reasons may include existing infrastructure, clearance necessary to comply with regulation, no alternative location for stormwater management, property boundary, etc.
6. Buffer Exhibit
Prepare a Tier II Buffer Exhibit for on-site streams. Dependent upon the number of segments, multiple sheets (8 1/2" by 11") may be used. On an overview, label each segment (a, b, c...) and provide a tabular summary, per bank-segment (e.g., left bank of segment a), of average buffer width. In addition to on-site streams, the exhibit shall display the following information: <ul style="list-style-type: none"> • 100- foot riparian buffer. (symbolize with a line) • Areas where the post-construction stream buffer are +/- 100 feet. (symbolize with shading, hatches, or dots, etc.) • On-site areas where buffers could be maintained at a distance of greater than a 100' if there are unavoidable constraints in some locations. (symbolize with shading, hatches, or dots, etc.)

Table 1: Expanded Tier II Riparian Buffer

Adjusted Average Optimal Buffer Width Key (in Feet)				
	Slopes (%)			
Soils	0-5%	5-15%	15-25%	>25%
ab	100	130	160	190
c	120	150	180	210
d	140	170	200	230

B. Tier II Forest Cover	
1. Instructions:	
<ul style="list-style-type: none"> a. If there is no net forest cover loss within the impacted Tier II watershed, mark this section N/A and proceed to Section C, Impervious Cover. b. Insert the Tier II watershed name at the top of each box. c. "Potential Constraints" include forest loss due to ROW, property boundaries, regulatory requirements, etc. d. Explain in detail alternatives considered, and any actions taken 	

B. Tier II Forest Cover - - Tier II Watershed: _____	
2. Calculation of Permanent Forest Cover Impacts	Acres +/-
a. Total on-site forest cover, <u>EXISTING</u> :	
b. Total on-site forest cover, <u>POST-PROJECT</u> :	
c. Total off-site reforestation or restoration, <u>IN</u> the Tier II Watershed listed above:	
d. Permanent forest loss due to <u>potential constraints</u> :	
e. Total forest cover retained in Tier II Watershed $2(b) + 2(c) =$	
f. Total forest cover loss in Tier II Watershed $2(e) - 2(a) =$	

B. Tier II Forest Cover - - Tier II Watershed: _____	
3. Forest Cover Loss Minimization	
If 2(d) is greater than 0, or if 2(f) is a negative value, evaluate on-site alternatives for forest cover impact minimization. Examples include minimizing ROW, alternate routes for roads, crossings, etc. to avoid forest cover impacts.	
4. Forest Cover Loss Mitigation	
To achieve no net negative impact as a result of the proposed activity, the applicant shall consider alternatives to mitigate impacts 'in-kind', for forest cover loss, to the maximum extent economically feasible. Provide additional information regarding the value in 2(c). Once those options are exhausted, applicants shall evaluate out-of-kind alternatives <u>within the Tier II watershed</u> that will help offset water quality impacts. These out-of-kind alternatives include impervious cover disconnection or retrofits, stream restoration, buffer enhancement, etc.	
5. Forest Cover Loss Justification	
If there are any remaining unavoidable impacts to forest cover, provide narrative justification and supporting documentation for impacts. Reasons may include existing infrastructure, clearance necessary to comply with regulation, no alternative location for stormwater management, property boundary, etc.	
6. Forest Cover Exhibit	
On an 8 ½" by 11" sheet(s), prepare an on-site Tier II Forest Cover Exhibit. Using varying symbology, show a basic site layout relative to 2(a), 2(b), and 2(d) above. Prepare a separate exhibit regarding any off-site reforestation, or out-of-kind mitigation opportunities in accordance with Section D.	

C. Impervious Cover	
1. Instructions:	
<ul style="list-style-type: none"> a. If ESD is used to treat all new, on-site, post-construction stormwater, mark this section N/A and proceed to Section D, Mitigation and Other Potential Requirements. b. Insert the Tier II watershed name at the top of each box. c. Explain in detail alternatives considered, and any actions taken. 	

C. Tier II Impervious Cover - - Tier II Watershed: _____	
2. Calculation of Impervious Cover Increase	Acres +/-
a. Total additional (new) impervious cover, <u>POST-PROJECT</u> :	
b. Total additional (new) impervious cover treated with ESD practices, <u>POST PROJECT</u> :	
c. <i>Total impervious cover not treated with ESD practices, <u>POST-PROJECT</u>:</i> <i>2(a) - 2(b) =</i>	

C. Tier II Impervious Cover - - Tier II Watershed: _____	
3. Impervious Cover Minimization	
If 2(c) is greater than 0, evaluate on-site alternatives for impervious cover impact minimization by identifying additional areas where ESD stormwater management practices can be utilized.	
4. Impervious Cover Offsets	
Add the area-acres of remaining unavoidable impervious cover increases (not treated with ESD) to the total targeted for mitigation under Section B(4). Increases such as these can be mitigated with forest cover restoration/afforestation, or through off-site mitigation alternatives such as impervious cover disconnection or retrofits, stream restoration, buffer enhancement, etc.	
5. Impervious Cover Justification	
If there is any remaining unavoidable addition of impervious surface acreage (not treated with ESD) and which is not offset, provide narrative justification and supporting documentation for impacts. Reasons may include existing infrastructure, clearance necessary to comply with regulation, no alternative location for stormwater management, property boundary, etc.	
6. Impervious Cover Exhibit	
On an 8 ½" by 11" sheet(s), prepare an on-site Tier II Impervious Cover Exhibit. Using varying symbology, show a basic site layout relative to 2(a), 2(b), and 2(c) above. Prepare a separate exhibit regarding any off-site reforestation, or out-of-kind mitigation opportunities in accordance with Section D.	

D. Tier II Mitigation and Other Potential Requirements

1. If mitigation is necessary:

- a. In-kind mitigation shall occur at a target ratio of 1:1.
- b. In order to satisfy the requirements of the Antidegradation Review, an applicant must demonstrate that they have conducted a robust alternatives analysis, including mitigation as a means for additional minimization of unavoidable impact to Tier II resources.
- c. MDE strongly recommends pre-application meetings.
- d. Regardless of application status, prepare preliminary analysis, including:
 - i. Preliminary site search for potential properties
 - ii. Basic exploration of out-of-kind possibilities, such as restoration, impervious cover retrofit or removal, etc.
- e. Mitigation is required for unavoidable net forest cover loss.
- f. The greater the net loss, the higher the restoration target.

D. Tier II Mitigation and Other Potential Requirements

2. Mitigation Plan Components

- a. Statement of unavoidable impacts to Tier II waters. This is total loss calculated in Section A (2)h, Section A(2)i, Section B (2)f, and Section C (2)c. Identify values specifically associates with stream buffers, forest cover, and impervious cover. Tabular totals shall be broken according to resource type and Tier II watershed impacted. The accompanying narrative shall include a summary of why impacts are considered unavoidable.
- b. Preferred mitigation alternatives analysis within the impacted Tier II watershed. The order of mitigation alternatives is as follows:
 - i. In-kind, on-site
 - ii. In-kind, off-site
 - iii. Out-of-kind, on-site
 - iv. Out-of-kind, off-site
- c. Mitigation site alternative analysis. Establish site search criteria. All locations must be located within the affected Tier II watershed identified for each unavoidable impact calculated in 2(a). Tabular totals shall include the amount of mitigation/offset selected alternatives achieve. Include maps of each mitigation property.
- d. Protection Mechanism. Explain the plan proposed to ensure that all areas identified for mitigation shall be protected in perpetuity. Permittees shall be required to provide documentation in the form of covenants, landowner agreements, deed details, etc. as well as financial assurances. This shall be provided no more than 60 days after completion.
- e. Site Description. Provide site address, name of property if known, map and parcel number, and centroid coordinates in latitude/longitude. Include maps of each mitigation property. Maps shall include natural resources (i.e. existing forest cover, streams, wetlands, etc.), roads, railways, and any other important identifying features. Maps shall include natural resources (i.e. existing forest cover, streams, wetlands, etc.), roads, railways, and any other important identifying features.
- f. Planting plan: Reforestation shall incorporate optimum vegetation selection guidance provided in the *State Forest Conservation Technical Manual, 3rd edition, 1997 by Maryland Department of Natural Resources*.

D. Tier II Mitigation and Other Potential Requirements
2. Mitigation Plan Components, Continued
g. <u>Monitoring Reports</u> . Properties shall be monitored for a minimum of five years to ensure site success. Reports shall provide visuals of establishment progress, as well as narrative descriptions. Include any issues encountered, overcome, and potential changes that may be necessary to meet objectives.

D. Tier II Mitigation and Other Potential Requirements
3. Other Potential Requirements
a. <u>pH Monitoring and Corrective Action Plan</u> . Often associated with in-stream grout activities. b. <u>Compaction Management Plan</u> . Often associated with linear activities, such as pipelines. c. <u>Water Quality Monitoring and Corrective Action Plan</u> . Associated with projects with in-stream impacts. d. <u>Biological Monitoring</u> . Project requirement for complex projects with direct or significant impacts. e. <u>Hydraulic Analysis</u> . Projects may include direct or significant near-stream disturbances, such as grading, vegetative removal, watershed boundary changes, etc. f. <u>Other requirements</u> . To address unique impacts specific to the activity or site. g. <u>Social and Economic Justification</u> . Depending upon the scope of impacts to Tier II resources and streams, applicants may be required to provide additional documentation to justify the permitting of an activity that will degrade Tier II streams, on a socio-economic basis.

Applicant Signature: _____ **Date:** _____

Provide a hardcopy responses to:

Maryland Department of the Environment
Environmental Assessment and Standards Program
Antidegradation Implementation Coordinator
ATTN: Angel D. Valdez
1800 Washington Blvd
Baltimore, Maryland 21230

Provide an electronic response, by CD to the address above, or a way to download the response from secure cloud-based site, email: to Angel Valdez at angel.valdez@maryland.gov.



Maryland Department of the Environment

Antidegradation Review Report Form
Alternatives Analysis - No Discharge Alternative



Purpose

This form is designed to help applicants assemble a complete Tier II Review report. This form specifically addresses evaluating alternatives that avoid impacts to Tier II watersheds and streams. It is strongly recommended that applicants complete this analysis as early in the project planning stages as possible, during initial property site search and screening analysis of purchase and feasibility alternatives.

The Department will use this information to determine whether or not an adequate alternatives analysis was conducted, and to help determine if a reasonable alternative to the proposed activity is available. MDE may provide additional comments during the course of the review.

Fill in all that apply:

1. **Project Name:** _____
2. **County ESC Plan Identifier:** _____
3. **Nontidal Wetlands & Waterways Construction Tracking Number: 20206_ _ _ _**
4. **General Permit Number:** _____
5. **Other Application Type and Number:** _____

Applicant Signature: _____ **Date Complete:** _____

Background

Code of Maryland Regulations (COMAR) 26.08.02.04-1 (G(1)) states that "If a Tier II antidegradation review is required, the applicant shall provide an analysis of reasonable alternatives that do not require direct discharge to a Tier II water body (no-discharge alternative). The analysis shall include cost data and estimates to determine the cost effectiveness of the alternatives".

For land disturbing projects that result in permanent land use change, this 'no discharge' analysis specifically evaluates the reasonability of other sites or alternate routes which could be developed to meet the project purpose, but are located *outside* of the Tier II watershed. Reasonability considerations, as applicable, may take into account property availability, site constraints, natural resource concerns, size, accessibility, and cost to make the property suitable for the project. This analysis shall be performed regardless of whether or not the applicant has ownership or lease agreements to a preferred property or route.

Information from this analysis may be used to inform minimization analysis.

Instructions and Notes

1. Complete the analysis for each Tier II watershed impacted.
2. Review the information in this document carefully. Prepare a report to address all of the analyses required by this document. Submit all Tier II analysis and documentation at one time.
3. To help improve review efficiency and avoid delays, do not leave any response blank. Please use "N/A" for any questions or sections that are not applicable.
4. Provide sufficient supporting documentation for narratives.
5. The level of analysis necessary, and amount of documentation that may be needed to make a decision is dependent upon project size, scope, and scale of relative impacts to Tier II resources. Please develop responses accordingly.
6. Reports/responses shall be submitted in electronic format, as well as paper. Full plans are not required unless requested over the course of the review.
7. Direct any questions regarding this form to Angel Valdez at angel.valdez@maryland.gov, or by phone at 410-537-3606.

No Discharge Alternative Analysis Final Documentation Checklist

- Signed & Dated MDE Tier II Alternatives Analysis – No Discharge Alternative form (page 1)
- Qualifying Exemptions with supporting documentation
- General Project Purpose Statement with relevant definitions
- Alternative Site Reasonability Analysis
 - Results of initial site search
 - Map of alternatives relative to preferred site and Tier II streams/catchment
 - Alternative Sites Summary Analysis Table Supplementary Information (per site)
 - Detailed Narrative of Alternate Analysis Outcome
- Alternative Route Reasonability Analysis
 - Results of initial site search
 - Map of all alternatives relative to preferred route and Tier II streams/catchment
 - Alternative Sites Summary Analysis Table Supplementary Information (per site)
 - Detailed Narrative of Alternate Analysis Outcome
- Narrative rationale for final decision of reasonableness

Qualifying Exemptions

For the purposes of the no discharge analysis for land disturbing activities, extenuating circumstances may apply to projects that are developed to address a specific need, may be linked to special funding, or linked to a specific location. Supporting documentation is required before consideration. Please read the following examples and determine whether or not a given situation is applicable.

The applicant must get concurrence from MDE as to the applicability of any special circumstances prior to completing the no discharge alternatives analysis. It is at the Department's discretion to determine whether a special circumstance applies, and whether or not this applicability means that there is not a reasonable alternative that avoids the Tier II watershed.

If none of the special circumstances apply, check "**Not Applicable**".

Not Applicable

Situation 1: Project is linked to unique or special incentives for State, County, or Municipality

Example: County needs for 1000 units of low-income senior housing in legislative district 7. Documentation must include the request for proposals (RFP) or similar missive to meet the housing need, and unique benefits or incentives lost if the project is moved outside of legislative district 7.

Example: Project is located in a State Designated Priority Funding Area, State Designated Enterprise Zone, or similar area targeted by the State for economic growth, business development, or investment.

Situation 2: Project has location specific limitations

Example: College campus extension. Education capital funding limits development to sites that are within 5 miles of the main campus. Documentation should include the RFP or similar documentation.

Example: Project is taking place in an existing right of way, or using an area that is currently operational. Such projects include replacing transmission lines, expanding operations on a working farm or business center.

Situation 3: Military project (or similar) with restrictions due to national security, etc.

Example: Construct a new runway and hangar for Air Force 1. The military may identify a certain location or base where this construction shall occur due to existing facilities, support personnel, and security concerns.

Situation 4: Project has little to no resource impacts.

Example: Repair or replacement of existing structures, road resurfacing, bridge maintenance using scaffolding, General Waterways Construction Permits, habitat restoration, rehabilitation, and stabilization.

Situation 5: Project is a "Grandfathered" development, that meets the specifications within Chapter 1.2, in the *Maryland Model Stormwater Management Ordinance, June 2009 & April 2010*

Administrative waivers, extension documentation, etc. are required documentation.

Note -This exemption does not apply to linear projects like roads or pipelines. Grandfathered projects are not exempt from the minimization alternatives analysis.

General Project Purpose Statement

1. Define the overall project purpose and site selection criteria. To result in a fair and meaningful analysis for the antidegradation review the site selection criteria must fall into the following parameters:
 - a. The statement must not be so narrowly constructed as to limit the results to one site with no other possible alternatives, or
 - b. Likewise, the statement cannot be too broadly written creating too many alternatives to effectively consider.
2. Example Statements
 - a. Too Narrow: To develop a high density residential housing complex consisting of 1000 living units on a 200 acre site adjacent to the Mall of Maryland. -- The likelihood that there are multiple properties other than the desired alternative available are unlikely, and this eliminates the possibility of properties outside of the Tier II watershed.
 - b. Too Broad: To develop a residential housing complex in Charles County. -- This will yield hundreds of results, creating a burdensome and unrealistic amount of work to evaluate each alternative.**
 - c. Reasonable: To develop a residential housing complex near a major shopping center in Northern Charles County. -- This will reduce the number of available properties to a more manageable amount, while still meeting the overall purpose of providing housing near a retail center in a target geographic area. The applicant can further refine the statement by defining "near", "major shopping center", and "Northern Charles County".
3. The applicant must craft a statement that yields at least 3 available alternative properties for further evaluation.
4. The level of detail for the alternative analysis process should appropriately match the complexity of the project taking into consideration factors such as resource impacts to Tier II watersheds in terms of impervious cover, forest cover loss, riparian buffer impacts, public comment, etc. For example, the amount of documentation provided for 3 alternatives to place a single dwelling on one acre is expected to be significantly less than the documentation expected for a 300 acre mixed-use development.

**Based on comments received during the review or other mitigating circumstances, the Department may require the applicant to evaluate additional alternatives, or provide a more in-depth analysis.

Table 1: Alternative Site Evaluation Summary Analysis Table			
Evaluate each criteria listed in the left hand column for each alternative site. Populate each box with the appropriate conditions, i.e. either yes/no, or by listing one or more of the options provided (a, b, c...), such as types of utilities available at a given site.			
	Site 1	Site 2	Site 3
Availability: a. Owned by applicant b. For sale c. Special, please explain (example: remediation required)			
Sizing appropriate: a. As is b. Purchase of adjoining property/ROW required			
Accessible Utilities: a. Electric b. Water c. Sewer d. Site access (existing road/bridge, etc.). e. None			
Development Resources: a. Existing SWM b. Existing buildings/structures c. Site cleared			
Zoning: a. Appropriate b. Waiver required			
Resource Impacts: a. Streams b. Forest c. Wetlands/wetlands buffer d. 100-yr flood plain			
Cost to Acquire is Reasonable: Yes or No			

Alternative Sites Summary Analysis Table Supplementary Information:

1. Explanation of site search criteria and rationale.
 - a. Relate project requirements to the criteria in Table 1.
 - b. Include any additional critical criteria not identified in the above table.
2. Results of initial site search.
 - a. List the available sites for consideration before the applicant chose 3 for further evaluation.
 - b. Include a brief narrative description of each site.
 - c. Include a table listing basic site address, lot size, parcel and map.
 - d. Include an overview map showing sites and their relative location to the preferred property.
 - e. If available, include Real Property Search Data (From Maryland Department of Assessments and Taxation (<http://sdat.dat.maryland.gov/RealProperty/Pages/default.aspx>), or MLS (Multiple Listing Service) information.
3. Expand upon the responses in Table 1.
 - a. Include a narrative that clearly explains how the applicant determined the final 3 sites for further consideration in Table 1.
 - b. Provide basic information about each site, i.e. land use, land cover, unique features, on-site resources such as streams, wetlands, relevant geology and/or hydrology, etc.
 - c. Discuss specific resource impacts.
 - i. Include a table that further breaks down the resource impacts associated with the 3 alternative sites.
 - ii. Include a narrative that further details whether resources could be avoided. For example, an on-site stream that will most likely be crossed to accommodate site access would make that site less favorable when compared to another option.
4. Justify final site decision.

Table 1: Alternative Route Evaluation Summary Analysis Table (use for linear projects such as roads, utility lines, etc)			
Evaluate each criteria listed in the left hand column for each alternative site. Populate each box with the appropriate conditions, i.e. either yes/no, or by listing one or more of the options provided (a, b, c...), such as types of utilities available at a given site.			
	Site 1	Site 2	Site 3
Availability: a. ROW Owned by applicant b. ROW can be acquired or leased c. Other, please explain			
Accessible Utilities (i.e. where connecting infrastructure is required): a. Electric b. Water c. Sewer or pipeline d. Site access (existing road/bridge, etc.). e. None			
Zoning: a. Appropriate b. Waiver required			
Resource Impacts: a. Streams b. Forest c. Wetlands/wetlands buffer d. 100-yr flood plain			
Cost to Acquire is Reasonable: Yes or No			

Alternative Route Summary Analysis Table Supplementary Information:

1. Explanation of route search criteria and rationale.
 - a. Relate project requirements to the criteria in Table 1.
 - b. Include any additional critical criteria not identified in the above table. For example, if the purpose of the project is to improve public safety, documentation must be provided to support this claim. For a new road this may include data on accidents, visibility issues, or geometric design issues that can complicate travel.
2. Results of initial route search.
 - a. List the available routes for consideration before the applicant chose 3 for further evaluation.
 - b. Include a brief narrative description of each route.
 - c. Include a table listing route start and end addresses, parcel and map, land use (i.e. residential neighborhood, commercial district, etc.)
 - d. Include an overview map showing results and their relative location within the impacted Tier II watershed.
3. Expand upon the responses in Table 1.
 - a. Include a narrative that clearly explains how the applicant determined the final 3 sites for further consideration in Table 1.
 - b. Provide basic information about each site, i.e. land use, land cover, unique features, on-site resources such as streams, wetlands, etc.
 - c. Discuss specific resource impacts.
 - i. Include a table that further breaks down the resource impacts associated with the 3 alternative routes. For example identify the number of streams on-site, potential forest loss for site clearing, etc.
 - ii. Include a narrative that further details whether resources could be avoided. For example, an on-site stream that will most likely be crossed to accommodate site access would make that site less favorable when compared to another option. Note: In making a final decision, MDE may take into consideration whether or not the project can avoid the impact by going over it (i.e. bridge) or under it (i.e. drilling). Consider this in the resource impact evaluation. The method of crossing may be a special permit condition.
4. Justify final route decision.

Provide a hardcopy responses to:

Maryland Department of the Environment
Environmental Assessment and Standards Program
Antidegradation Implementation Coordinator
ATTN: Angel D. Valdez
1800 Washington Blvd
Baltimore, Maryland 21230

Provide an electronic response, by CD to the address above, or a way to download the response from secure cloud-based site, email: to Angel Valdez at angel.valdez@maryland.gov.



Maryland

Department of the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

December 21, 2020

Mr. Harvey Johnson
US Army Corps of Engineers (USACE) Baltimore District
Programs and Project Management Division
2 Hopkins Plaza, 10th Floor
Baltimore, MD 21201

Re: Comments on the Draft Environmental Impact Statement for the Bureau of Engraving and Printing Project

Dear Mr. Johnson:

The purpose of this letter is to convey the Maryland Department of the Environment's, Wetlands and Waterways Program's (Program), comments on the Draft Environmental Impact Statement (DEIS) for the proposed Bureau of Engraving and Printing (BEP) Project. As stated in the DEIS, the purpose of the project is to construct and operate a new currency producing facility on federally owned, available land within the National Capital Region (NCR) that is readily accessible to interstate roadways and commercial airports for transportation of US currency. The project, as described in the DEIS, will impact nontidal wetlands, the 25-foot nontidal wetland buffer, and waterways, including the 100-year nontidal floodplain and will require a Nontidal Wetlands and Waterways Permit.

The following are the Program's comments on the DEIS and are divided into four categories which track with the main elements of permit review and processing outlined in the Code of Maryland Regulations. Please note that as additional information is provided, the Program will likely have further comments relating to potential impacts to regulated resources.

Project Purpose and Need

1. Chapter 1.0 Purpose and Need for the Proposed Action, Section 1.1: The DEIS states that the expectation is for the need of currency notes in circulation to increase for the next 10 years. What is this expectation based on? What is the forecast for the currency circulation after the next 10 years? Is it expected to continue to increase, decrease or stay consistent?
2. Chapter 1.0 Purpose and Need for the Proposed Action, Section 1.4: One of the reasons given for the selection of the Beltsville Agricultural Research Center site is BEP's desire to construct the new facility in the National Capital Region because of the skilled workforce. What other locations within the National Capital Region were considered? What would be the impacts to natural resources (i.e., wetlands and waterways) at other possible locations within the National Capital Region?
3. Chapter 1.0 Purpose and Need for the Proposed Action, Section 1.4: Please elaborate on the statement "production function are spread across multiple floors and wings of the building, resulting in manufacturing processes that are inefficient and pose safety risks to staff". This is important because the Department requires avoidance and minimization of impacts to regulated resources. A multi-floor building could require less of a footprint on the ground and potentially minimize impacts to regulated areas.

Alternatives Analysis

4. Chapter 2.0 Description of Proposed Action and Alternatives, Section 2.3: This Section of the DEIS, mentions that 81 potential sites for the new BEP location were identified. Of these, 31 did not meet the minimum screening criteria, while 25 were privately owned and were dismissed from consideration because it would cost approximately \$30 - \$60 million dollars to repurpose the site. What is this repurposing cost estimate based on? Were impacts to natural resources evaluated on these properties?

Avoidance and Minimization of Impacts

5. Chapter 3.0 Affected Environment and Environmental Consequences, Section 3.7.1.2: Six palustrine nontidal wetlands have been identified in the study area. Proposed unavoidable impacts to these resources will require BEP to submit a *Joint Federal/State Application for the Alteration of Any Floodplain, Waterway, Tidal or Nontidal Wetland in Maryland* (Application) to the Program. Prior to submitting the Application, we strongly encourage BEP to request a pre-application meeting with the Program. At the pre-application meeting we can discuss avoidance and minimization of impacts to nontidal wetlands, the 25-foot nontidal wetland buffer and waterways, including the 100-year nontidal floodplain. A pre-application meeting may be requested online at:

<https://mde.maryland.gov/programs/Water/WetlandsandWaterways/Pages/PreApplicationIntroduction.aspx>

Additionally, BEP should consider presenting the project at a Joint Evaluation (JE) meeting. In addition to representatives of the Maryland Department of the Environment, representatives from other State agencies, (e.g., Maryland Department of Natural Resources, Maryland Historical Trust) and federal agencies (e.g. U.S. Army Corps of Engineers, Baltimore District, Regulatory Branch, U.S. Environmental Protection Agency, U.S. Fish and Wildlife Service) attend JE meetings and provide comments on the projects that are presented. Please visit the Program's website for more information about how to request being included on the JE meeting schedule:

https://mde.maryland.gov/programs/Water/WetlandsandWaterways/Pages/Joint_Evaluation.aspx

Please note that information on all impact avoidance and minimization efforts as well as the reasons for the impacts (e.g., lot fill, building/road construction, etc.) will need to be thoroughly discussed in the Application. All impacts to regulated resources, both permanent and temporary, will need to be quantified on a table(s) and clearly shown on impact plates. Please see comment no. 7 below regarding mitigation for permanent nontidal wetland impacts.

6. Chapter 3.0 Affected Environment and Environmental Consequences, Section 3.7.2.2: The 117 linear feet of stream to be diverted/relocated should be done in a way that results in the natural stream system with a stable dimension, pattern and profile. Additionally, further details are required regarding the statement "fill and not replace 109 linear feet of the on-site second intermittent stream".

Mitigation

7. Chapter 3.0 Affected Environment and Environmental Consequences, Section 3.7.1.2: Mitigation will be required for all permanent impacts to nontidal wetlands. Please note that in the past for similar projects, the Program has required mitigation for permanent impacts to isolated nontidal wetlands when mitigation is required for permanent impacts to connected nontidal wetlands. Therefore, when developing a mitigation proposal, please include all permanent impacts to nontidal wetlands. Please contact Ms. Kelly Neff of the Nontidal Wetlands Division's Mitigation and Technical Assistance Section to discuss nontidal wetland mitigation for the project. Ms. Neff can be reached at 410-537- 4018, 443-463-9722 or at kelly.neff@maryland.gov .

Mr. Harvey Johnson

Page 3

Water Quality Certification and Coastal Zone Consistency

8. Please be aware that assuming the U.S. Army Corps of Engineers, Baltimore District, Regulatory Branch will review the project as an Individual Permit, the Program will need to review the project for an individual Water Quality Certification (WQC) and Coastal Zone Management Act consistency determination (CZMA). on September 11, 2020, EPA updated requirements for Section 401 of the Clean Water Act, which include new requirements for project proponents. For more information on WQC or CZMA in Maryland please consult

<https://mde.maryland.gov/programs/Water/WetlandsandWaterways/PermitsandApplications/Pages/index.aspx>

Please feel free to contact me with any questions about these comments or about the regulatory review Process. I can be reached at 410-537-3766, 443-829-8127 or at amanda.sigillito@maryland.gov.

Sincerely,



Amanda Sigillito

C: Heather Nelson (Wetlands and Waterways Program)
Kelly Neff (MDE – Mitigation and Technical Assistance Section, Nontidal Wetlands Division)
Jeff Thompson (MDE – Central Region, Nontidal Wetlands Division)
William Seiger (MDE – Waterway Construction Division)

From: noreply@dma.mil <noreply@dma.mil>
Sent: Tuesday, December 22, 2020 11:35 AM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: BEP web page comments

Name Amanda Malcolm

Email

Address

(1) Line 2476 reads, "Treasury has not yet determined solid waste, telecommunication, or stormwater requirements; these will be determined through the proposed CPF design process in coordination with potential providers." This suggests that stormwater management comments are not expected.

(2) Figure 3.7.3 shows no BMPs. There is nothing in the EIS Draft that mentions specific requirements for sediment control and stormwater management approval in Maryland. The General Construction Permit is referenced but they have not cited the Maryland Stormwater Management and Erosion & Sediment Control Guidelines for State and Federal Projects. It is recommended that reference be made to MDE's sediment and stormwater regulations, guidelines, and technical procedures. The procedures presented in the Maryland Stormwater Management and Erosion & Sediment Control Guidelines for State and Federal Projects and our webpage will need to be followed.

(3) Section 3.11.1.2 Applicable Guidance states, "The EISA and EO 13508 also require agencies to maintain the pre-development hydrology of project sites and manage stormwater runoff through the consideration of GI/LID features (see Section 3.7)." In addition, MD Regulations will have to be met which in some regards could be more conservative.

**Submit
your
Comments**

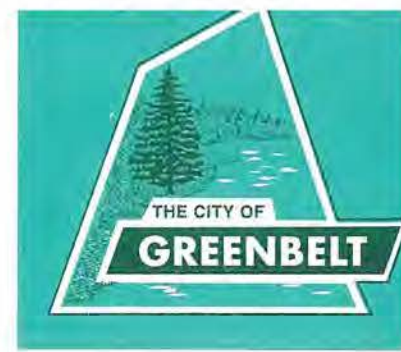
<https://mde.maryland.gov/programs/water/StormwaterManagementProgram/Pages/PlanReviewforStateandFederalProjects.aspx>

Local Jurisdiction Comments

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CITY OF GREENBELT

25 CRESCENT ROAD, GREENBELT, MD. 20770-1886



December 21, 2020

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

CITY COUNCIL
Colin A. Byrd, Mayor
Emmett V. Jordan, Mayor Pro Tem
Judith F. Davis
Leta M. Mach
Silke I. Pope
Edward V.J. Putens
Rodney M. Roberts

Submitted via email to: BEP-EIS@usace.army.mil

Dear Mr. Johnson:

The City of Greenbelt has completed its review of the Draft Environmental Impact Statement (DEIS) for the Construction and Operation of a Currency Production Facility (CPF) at the Beltsville Agricultural Research Center (BARC) (Project). The City continues to believe that the proposed relocation of the Currency Production Facility to the Beltsville Agricultural Research Center will have significant impacts on BARC, the human and natural environment, transportation, and the surrounding community. The Project DEIS does not comply with the National Environmental Policy Act (NEPA) and fails to provide the public completed and sufficient analyses. The City supports the No Action Alternative and is strongly opposed to the U.S. Department of the Treasury's (Treasury's) Preferred Alternative. As summarized below and explained throughout our comments, the Treasury must fix the faulty DEIS, provide the public with the information we have requested, and issue a Supplemental DEIS and provide the requisite additional time for public review and comment.

Despite assertions in the DEIS that "[p]ublic scoping comments are [...] addressed within each resource area discussion in the Draft EIS," the City finds that many concerns

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raised during the public scoping period have not been addressed. In many instances, the DEIS raises additional questions and concerns.

The DEIS fails to advance a reasonable range of alternatives for consideration. The information provided indicates that the DEIS has been completed to rationalize or justify decisions already made, as opposed to serving practically as an important contribution to the decision-making process. Multiple rounds of alternatives were screened out prior to engagement in the NEPA process, leading to the elimination of all alternative sites other than the BARC site. The Purpose and Need statement is too narrowly defined, and the final screening criteria outlined in the DEIS lack clear justification. The City strongly encourages Treasury to revisit the Project's Purpose and Need statement and the final screening criteria to produce a wider range of options based on rational and justifiable criteria. Additionally, to provide a fuller understanding of Treasury's decision-making process to date, Treasury should make available to the public the following documents:

- *Feasibility Study for Renovation and/or Relocation of the Washington, DC Facility* (2010)
- *Facility Strategic Alternatives Study* (2013)
- *Federal Agency Initial Site Investigation and Screening* (2015)
- *Future Workplace Recommendations Report* (2017)
- *Conceptual Site Layouts and Utility Study, Beltsville Agricultural Research Center* (2020)

To enable a more comprehensive understanding of land use planning at BARC, Treasury and USDA should also make available the 1979 *Beltsville Agricultural Research Center Master Plan* and all updates, including the 1996 *Master Plan Update Master Plan Report*.

Furthermore, while the City maintains that additional alternatives should be considered in the DEIS, the analysis and findings related to the two alternatives put forth (Treasury's Preferred Alternative and the No Action Alternative) are deficient in many aspects and raise concerns and questions about the Project. A number of these concerns and questions are related specifically to resources, including land use; historic buildings and structures; visual resources; Beaver Dam Creek and surface waters; stormwater; wetlands; forest retention; lighting; wildlife; traffic and transportation; and environmental justice. More generally, the City is concerned that the methodology employed in determining "regions of influence" and significance thresholds for many of the resources leads to incomplete assessments of effects and their significance. The limits of disturbance and the site boundary both have inconsistencies, and there is a need for additional field investigation of wetlands, forests, and wildlife. Additional information should be provided regarding facility security requirements and their effects, along with accounts of past BEP environmental violations and enforcement issues at the Washington, D.C., facility.

Finally, the City is particularly concerned that the analysis of Treasury's Preferred Alternative does not account for all Project impacts. The limits of disturbance do not include all areas that will be disturbed and the DEIS does not consider the impact of all necessary actions, including utility work and transportation mitigation. The full scope of the Project should be clarified, and all impacts resulting from all aspects of this Project must be addressed. The DEIS should clarify how the Project will comply with Section 404 of the Clean Water Act. If this project will result in the implementation of additional actions (e.g., the widening of Kenilworth Avenue to accommodate increased traffic), this must be made clear and any associated impacts should be addressed in the DEIS and covered under the same permit as the Project. Further, the assessment of cumulative effects is grossly insufficient. Additional investigation should be performed and justification provided for assessments pertaining to the cumulative effects of the Proposed Action and other past, present, and reasonably foreseeable future actions, particularly in terms of impact on the BARC Historic District, land use on BARC and on the surrounding community, wetlands and waterways (with particular consideration of impact to Beaver Dam Creek, Indian Creek, and impact to wetlands which falls below mitigation thresholds), wildlife habitat, transportation, and climate change (including consideration of possible reductions in transit use due to Project implementation), and adequate mitigation or impact-reduction measures should be proposed to address cumulative impacts of the Project. The City is particularly concerned about the proposed MAGLEV project, the I-270/I-495 Managed Lanes project, and the possible widening of MD-201 and the Beltway, but a thorough accounting of all relevant projects should be provided.

At this time, the City restates its strong opposition to Treasury's Preferred Alternative and support for the No Build Alternative. We urge Treasury to reconsider the Purpose and Need of the Project and the alternatives under consideration. We also request that a more complete investigation of all alternatives be provided with the next iteration of the DEIS. We firmly believe that BARC is an inappropriate location for the CPF, and that the location of a replacement CPF on BARC will harm BARC, our community, and the region.

If Treasury does not issue a Supplemental Environmental Impact Statement and provide the required public review and comment, the City asks that the missing information we have requested be provided and an extension of the comment period on the DEIS be granted. The City requests that additional documents and supporting materials be made available to the public, so that the public can understand and meaningfully comment on Treasury's decision-making process to date, and meaningfully inform Treasury's final decision and implementation. An extended comment period would allow time for review of documents and generation of additional comments.

Thank you for the opportunity to comment. The City's detailed comments are included as an attachment. The City urges you to review the attachment, so you can fully understand how the DEIS fails to adequately evaluate and mitigate the impacts of this project. If you have any questions please contact Terri Hrubby, Director of Planning and Community Development, at 301-345-5417.

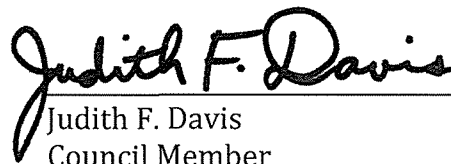
Sincerely,



Colin A. Byrd
Mayor



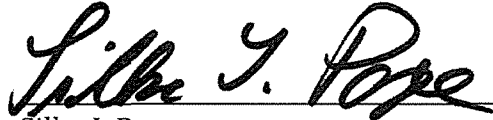
Emmett V. Jordan
Mayor Pro Tem



Judith F. Davis
Council Member



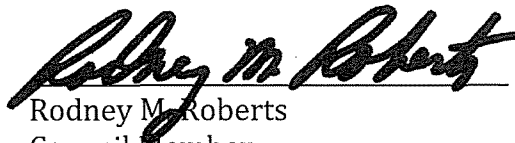
Leta M. Mach
Council Member



Silke I. Pope
Council Member



Edward V.J. Putens
Council Member



Rodney M. Roberts
Council Member

Attachment: City of Greenbelt Comments

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

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

DRAFT ENVIRONMENTAL IMPACT STATEMENT

CITY OF GREENBELT’S COMMENTS

DECEMBER 14, 2020

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City of Greenbelt

Department of Planning and Community Development

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I. Purpose and Need

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

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

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

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

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

II. The Future of Paper Currency

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

III. Alternatives Considered

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

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

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

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

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

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

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

IV. Project Site Boundary

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

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V. Region of Influence Designations

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

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

VI. Environmental Consequences and Significance

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

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

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

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

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

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

VII. Land Use and Zoning

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

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

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

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

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

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

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

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

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

VIII. Historic Buildings and Structures

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

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

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

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

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

IX. Visual Resources

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

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

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

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

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

X. Beaver Dam Creek and Surface Waters

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

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

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

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

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

XI. Stormwater

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

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

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

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

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

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

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The City offers the following comments pertaining to the FONPA:

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

Additional comments pertaining to wetlands generally include:

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

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

XIII. Forest Retention

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

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

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

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

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

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

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

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

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

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

XIV. Lighting

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

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

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

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

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

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

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

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XV. Wildlife

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

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

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

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

XVI. Traffic and Transportation

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

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

The City offers the following comments:

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

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

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

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

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XVII. Environmental Justice

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

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

XVIII. Need for Additional Field Investigations

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

XIX. Connected Actions

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

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

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

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

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

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

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XX. Cumulative Effects

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

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

XXI. Limits of Disturbance (LOD)

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

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

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

XXII. Security and Facility Requirements

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

XXIII. Operational History of Existing Facility

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

XXIII. Additional Concerns

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



Todd M. Turner
Council District 4

December 21, 2020

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

Re: Comments on the Draft Environmental Impact Statement for the Proposed Replacement Currency Production Facility at the Beltsville Agricultural Research Center in Prince George's County, Maryland – By Email

To Whom It May Concern:

Please consider these comments on the Draft Environmental Impact Statement (DEIS) for the Proposed Bureau of Engraving & Printing (BEP) Replacement Currency Production Facility (CPF) at the Beltsville Agricultural Research Center (BARC) in Prince George's County, Maryland. I am the elected member of the Prince George's County Council, 4th Council District and represent the area to the south of the proposed site, including the City of Greenbelt, the Washington Metropolitan Area Transit Authority (WMATA) Greenbelt Metrorail Station and several of the intersections impacted by the preferred alternative.

It is my understanding that the BEP has selected an unused 100-acre parcel of land at the 6,500-acre Beltsville Agricultural Research Center as its preferred location for the \$1.4 billion CPF that includes up to \$400 million of new equipment. The CPF would include a new 1 million square foot one-story facility which is projected to employ a workforce of approximately 1,600 employees working over three-shifts. According to the DEIS the current BEP production workforce, approximately sixty-eight (68) percent reside in Maryland and thirty-one (31) percent in Prince George's County.

The County has adopted, and is updating, an overall economic development policy, entitled "*A Targeted Economic Development Strategic Plan for Prince George's County*", focusing on specific development plans to advance targeted industry clusters likely to drive economic growth in the County – including additional opportunities for the Federal Government relocation and expansion. The potential relocation of the Replacement Currency Production Facility (CPF) at the Beltsville Agricultural Research Center (BARC) falls squarely within the County's economic development strategy.

With respect to the DEIS itself, I provide the following summary comments on each of the following keys impacts for the areas reviewed in the DEIS:

I. Land Use

Since the proposed property is currently zoned “Residential – Reserved Open Space” (R-O-S) under the Prince George’s County Zoning Ordinance, if the land is transferred between the U.S.D.A. and Treasury as recommended, Treasury should engage the Prince George’s County Planning Department and the County Council for a potential change to the uses and/or zoning for the property to meet the expected uses of the CPF.

II. Water Resources

The proposed project should meet and exceed all applicable County stormwater management requirements, including for both water quantity and quality as established under the County’s Erosion And Sediment Control And Stormwater Management provisions. In addition, all controls should be managed on-site and minimum impact on the identified water resources, including streams, wetlands and the Beaverdam Creek.

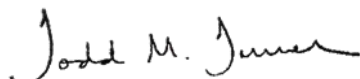
III. Traffic and Transportation

Treasury must fund and do all proposed mitigation for road, traffic signal and other improvements recommended, especially for the six (6) intersections that fail. In addition, Treasury should implement multi-modal elements, including shuttle, bicycle and pedestrian for both employees and surrounding communities, and engage WMATA is extension and/or expansion of transit service and transit/commuter benefit programs to the proposed CPF to reduce single-occupancy vehicle (SOV) usage.

The proposed Bureau of Engraving & Printing (BEP) Replacement Currency Production Facility (CPF) at the Beltsville Agricultural Research Center (BARC) in Prince George’s County is an exciting opportunity for both the County and the Federal government. However, the propose CPF must address its significant impact of the surrounding communities, as well as the environmental, economic and transportation issues, that such a project would create at the preferred location. Given the extensive public and governmental input and the extended timeline line for the planning, approval and construction, I am hopeful that all issues can be addressed appropriately going forward.

Thank you for your consideration of these comments. Please feel free to contact me if you need additional information.

Sincerely,



Hon. Todd M. Turner
Council Member – 4th District



Thomas E. Dernoga
Council Member
District 1

December 21, 2020

ATTN: Bureau of Engraving and Printing (BEP) Project EIS
US Army Corps of Engineers (USACE)
Baltimore District Planning Division
2 Hopkins Plaza, 10th Floor
Baltimore, Maryland 21201

Re: Comments to Draft Environmental Impact Statement for Bureau of Engraving and Printing Replacement Project

Dear Sir or Madam:

Thank you for the opportunity to provide comments regarding the Draft Environmental Impact Statement (EIS) for Bureau of Engraving and Printing (BEP) Replacement Project. My comments reflect the presentation, comments from my constituents at community meetings, the presentation and materials provided at the December 2, 2020 Webex Public Meeting and on the project web site.

Accuracy and Consistency of the Draft EIS. The Draft EIS and its supporting documents and presentation had multiple inconsistencies. For example, the Scoping Phase Report stated that ““nearly 100 sites and multiple funding options explored.”; yet the Draft EIS states that the “Treasury Department gathered data on 81 potential sites.” Inconsistencies were noted between the Scoping Phase Report, internal inconsistencies within the Draft EIS chapters, and inconsistencies between the report and the multiple exhibits posted on the BEP Project web page.

The initial Draft EIS summary chart posted was reviewed at a community meeting on November 9, 2020 and noted significant impact on only the two (2) streams on the proposed location, yet the current version now shows five (5) areas of significant impact. If materials are updated, they should be noted as such with the date and time along with a summary page of changes.

The Public Comments at the December 2, 2020 meeting highlighted errors in accuracy of data in the areas of wildlife. The Draft EIS noted minimal bird species in the area yet the Greenbelt Ornithological group has counted 238 diverse species on the property. A review of the associated appendices did not provide sufficient details on the methodology, collection periods, and analysis.

Accessibility to the Draft EIS. During the December 2, 2020 Public Meeting, the project staff was asked repeatedly about how to receive hard copies of the reports, or at least to have the documents available at the Department of Agriculture library for residents who did not have access to on-line computers. No answers were provided.

Residents from Odell Road and the historically African American Vansville community were noticeably absent from the December 2, 2020 Public Meeting. When asked had they been individually contacted, the project staff response was that adequate public announcement of the meeting had been provided. Since these primarily minority communities are the most directly impacted by the proposed relocation of the BEP, it is a concern that they were not given additional notification and options on how to participate.

Alternatives to the Beltsville Agricultural Research Center (BARC) property. As noted above, the Scoping Report claims to have conducted a vigorous analysis of multiple sites with the December 3, 2019 presentation stating that “nearly 100 sites and multiple funding options explored.” The Executive Summary states that, based on the purpose and need, only the 104-acre parcel at BARC met the need of the BEP. The alternatives screening process notes that of the 81 sites identified all but six were discounted almost immediately due to the new criteria of the location must be on available Federal property (the rationale given was no money has been programmed to procure property). The decision not to seek funding is not a sufficient reason to select the BARC location. The new facility will allow the closing of the Landover warehouse and the funds saved could be applied to a commercial site.

Land Use. The location of a heavy industry in a residential-open-space (R-O-S) zone and on the Beltsville Agricultural Research Center is contrary to the purpose of the proposed location. Replacing a 100+ acre agricultural property [referred to as 104 acres and 122 acres in the Draft EIS] with heavy industry to include bulk chemical storage, hazardous material, and flammable materials is a significant departure from the existing usage. Further, the proposed facility is to be 40-50 feet high (2-3 stories) which is a complete departure from existing facilities on the BARC property and industrial facilities adjacent to the BARC property in Beltsville. Yet the report characterizes this change as having a less-than-significant adverse impact to local zoning, and states that as a Federal facility, a zoning change is not required – in essence ignoring the existing zoning is a right regardless of what the County and its residents have approved.

Visual Resources. The Draft EIS identifies potentially significant adverse impacts to the 34 homes along Odell Road based on the views of the 50-foot high building and night time lighting. The Draft EIS states the proposed facility “would be a permanent feature of the visual landscape” for the residents abutting the BARC property. It is inappropriate and potentially discriminatory to dismiss the impact of the predominantly minority population abutting the BARC property.

In addition, there is no mention of the impact of the changes to the view to historical building views on the grounds. The impact on these historical building views needs to be assessed.

Air Quality. The Draft EIS analysis is based on projections and assumptions subject to change making the data in the report specious. The projected annual pollutant emissions during operation (Table 3.4-3) states the Currency Production Facility (CPF) will have a *beneficial impact* based on a reduction of VOC emissions in downtown Washington, DC. This comparison is irrelevant. The issue is what is the impact in the BARC area? Based on the data provided, the emissions would be higher than existing in the Beltsville-Laurel area today. In a different section, the Draft EIS states that emissions from operations could disproportionately affect surrounding communities of concern with the only mitigation being some traffic mitigation. The unknown impact of the air quality to the residents living along Odell Road and in Vansville is of great concern to these residents, many of whom are minorities and elderly with pre-existing medical conditions that would be negatively impacted by any degradation of the air quality. The negative air quality impact raises environmental justice concerns.

The analysis needs to recognize the documented poor local air quality. The Metropolitan Washington Council of Governments (MwCOG), through the Metropolitan Washington Air Quality Committee (MWAQC), is responsible for air quality monitoring and compliance in the metropolitan region. MWAQC is the entity certified by the Mayor of the District of Columbia and the Governors of Maryland and Virginia to prepare an air quality plan for the DC-MD-VA Metropolitan Statistical Area under Section 174 of the federal Clean Air Act Amendments of 1990. I am a current member of MWAQC and have previously served as Commission Chair. In executing its responsibilities, MWAQC coordinates air quality planning activities among MwCOG, other external committees, and the Transportation Planning Board; reviews policies; resolves policy differences; and adopts an air quality plan for transmittal to the District of Columbia, Maryland, and Virginia. The State air agencies maintain 14 air quality monitors in the region, including one at the Howard University property in Beltsville adjacent to the BARC property. MWAQC reports have long documented that the Beltsville monitor records some of the highest pollution levels in the region. Attached is the 2019 Ozone Season Summary from MWAQC (July 25, 2019) (<https://www.mwacog.org/events/2019/7/24/metropolitan-washington-air-quality-committee/>). See Slide 3 for the Beltsville ozone exceedance levels.

Traffic and Transportation. The Draft EIS studied 15 intersections surrounding the BARC property and found 8 of the 15 currently operating at failing level. Furthermore, the analysis found the pedestrian and bicycle network extremely limited and that there is no public transportation that services the proposed area of the BARC property. The construction phase will require temporary closure of part or all of Powder Mill Road - further exacerbating traffic congestion. This additional degradation of roadways during construction was deemed to be of less-than-significant adverse impact. Long-term mitigation measures of use of the USDA shuttle, adjusting signal control, changing roadway configurations, and adding new lanes are suggested with no data on impact of each and no statement of who would pay for such changes. The conclusion that there will be no impact on failing roadways puts into doubt the logic and analysis used. Any additional negative impact will be significant on already overcrowded and failing roadways.

The proposed CPF will have a surface parking lot of 1,179 spaces which assumes the majority of employees will be commuting by single-occupancy vehicles, which is not included in the analysis. There is no reference to an exception to the 3-1 parking regulation at new Federal facilities enacted during the Carter administration. Based on the existing regulation, the new CPF should be providing 533 parking spaces only. There was also no analysis of the use of permeable pavers or the use of a parking garage to minimize the parking footprint which would lessen the environmental impacts.

Environmental – Watersheds. The BARC property is home to several watersheds, including the Indian Creek and Upper Beaverdam Creek, as well as wetlands and groundwater. The Draft EIS states that the new CPF will produce an additional 120,000 gallons per day to be treated and discharged into the existing watershed. and states that this will have less-than significant impacts on the flow of surface waters (including Beaverdam Creek). The impact of this discharge, in addition to the removal of wetlands and the paving of 100 acres, was not fully analyzed in the study. The County is just completing a project to raise a section of Sunnyside Avenue (adjacent to the BARC property) that drains to the same creeks due to chronic flooding. The longstanding problem raises significant doubts of whether the Draft EIS conclusion of “no significant impact” is correct.

Environmental – Bird Studies. An analysis published in the journal “*Science*” (September 2019) documented a decline of birds in the United States by 29% over the past half-century, a catastrophic loss to ecosystems. A key issue is habitat loss. The area around the proposed site is a prime nesting area for particular bird species. Studies of some of these species have been ongoing for three decades or more and have identified more than 238 species using the proposed area. The Draft EIS found only 12 species. The Draft EIS data and its analysis need to be fully reviewed and updated to reflect or explain the differences between these studies and the findings in the Draft EIS. The potential impact of further building and removal of undeveloped land must be evaluated, and minimization practices must be implemented.

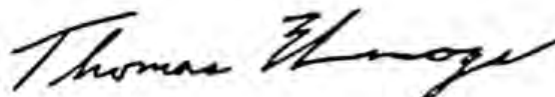
Hazardous Materials Storage and Disposal. The Draft EIS highlighted that the new facility will both store and dispose of hazardous materials. “The potential for accidental releases of HTMW would have less-than-significant adverse impacts” with the only mitigation being compliance with existing codes and regulations. This fails to account for the impact of toxic materials impacting pristine ground waters and impacts on air quality. This section of the report appeared to be proforma with no analysis of the impact of spills and releases on the existing environment, impact on agricultural research and the Department of Agriculture workforce, and the impact to adjacent residents.

Communications and Web Site. Based on constituent responses that we are still receiving, it is clear that continued dialog with regional residents should be part of the process. The posting of materials on the website is valuable but does not supersede the need for placing hard copies of the documents in the locally accessible Department of Agriculture library and holding more than one public meeting to replace personal meetings due to COVID-19 restrictions. This need was underscored during the December 2, 2020 Public Meeting during which the project staff was asked repeatedly about how to receive hard or have access to copies of the reports. No answers were provided.

Insufficient Outreach to Adjacent Residents. As noted above, the failure to do more extensive outreach to the bordering residents on Odell Road and the Vansville community raises environmental justice concerns. The consistent discounting of impacts to these communities in the Draft EIS underscored the dismissive attitude of the analysis on these primarily minority and elderly residents and may be interpreted as discriminatory behavior. I urge you to do further direct outreach to these communities and listen to their concerns regarding the relocation of the BEP to the BARC property.

Again, thank you for the opportunity to provide comments to the Draft Environmental Impact Statement. I look forward to continuing to work with you on this project. Please call me with any questions.

Sincerely,

A handwritten signature in black ink that reads "Thomas E. Dernoga". The signature is written in a cursive, flowing style.

Thomas E. Dernoga

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Non-Governmental Organization Comments

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ANACOSTIA WATERSHED SOCIETY

December 16, 2020

James R. Foster
President

Attention: Bureau of Engraving and Printing (BEP) Project EIS,
US Army Corps of Engineers (USACE) Baltimore District
Planning Division
2 Hopkins Plaza, 10th Floor
Baltimore, MD 21201

BOARD OF DIRECTORS

Elissa Feldman
Chair

Re: Comments on Proposed Bureau of Engraving and Printing Development
at the Beltsville Agricultural Research Center (BARC)

Neil Lang
Vice Chair

Via: Email to BEP-EIS@usace.army.mil

Kathryn Petrillo-
Smith
Treasurer

From: James Foster, President, Anacostia Watershed Society,
[REDACTED]

Lars Hanslin
Secretary

The Anacostia Watershed Society (AWS) is working to restore the Anacostia River to Swimmable and Fishable. Land use and management, transportation, and community impacts are areas that we are focused on to accomplish our mission. AWS appreciates the opportunity to submit these comments for review and your consideration.

Nina Albert

Donna An

Maria Earley

We are presenting comments to the proposed project that will happen in the Anacostia watershed. It is our belief that, while the impacts as presented can and should be mitigated, there is an overarching diminishment of the BARC that is not accounted for in any review. We ask that building design, transportation, and community impacts be minimized and attenuated at every decision point. Sustainable, resilient, inclusive best practices must be part of the long-term design and management of the site and operations.

Michael Lederman

Kathleen Linehan

Cynthia Quarterman

Matthew Ries

Nigel Stephens

Michael Tilchin

This project is proposed for a site previously developed as a research farm and that fact is positive compared to developing undisturbed forest land. The site does not appear to be utilized currently and seems to have reverted to meadow, some forest, and wetlands in the times since operations there ceased. While the land was impacted by past practices it does retain its agricultural connections and there are some cultural resources connected to the history and watershed.

General Counsel
David Ginsburg

*Founder and
Honorary Member*
Robert E. Boone

Constructing this project will impact those resources that no mitigation will compensate for.

From the USACE presentation of impacts: Every effort should be made to avoid these impacts and only then mitigate at minimum of 3-5 times.

- *Diversion or fill of approximately 226 linear feet of stream (potentially significant adverse impact)* Our streams have been grossly impacted in the Anacostia.
- *Permanent fill of 0.94 acre of wetlands and 0.65 acre of wetland buffer.* Existing wetlands are very important to a healthy river.
- *Potential increased stormwater volume and runoff, sedimentation, and soil contamination.* AWS is working everyday to stop pollution and requests a stronger response for any impacts to water quality.
- *Discharge of wastewater to local treatment plant.* Discussed further below.

In a complete evaluation of this proposed development, discussion of the existing footprint and operations in DC and its impact on the Anacostia River would be measured and remediation of the existing site and surrounding waterway, discharge to the public sewer system, and air would be discussed. There will be air and water quality impacts from the proposed and possible future manufacturing of cash and equivalents at the site. This might be part of the LEED assessment. We also recommend applying for the American Society of Landscape Architects Sustainable Sites Initiative for this project.

Almost 40 years ago I worked for an environmental consulting firm that conducted a large assessment of the environmental activities at the BEP facility in DC. The wastewater discharge was a slurry the color of money. The volatile organic compounds generated from the use of inks, I believe, was one of the factors that led to the discontinuance of stamp printing there. This could be a positive affect in the mass balance of this proposed move if made part of the calculation. Specifically, I believe there to be offsite contamination that resulted from operations that will need to be remediated and the river compensated as part of the Natural Resources Damage Assessment currently being conducted.

The Transportation impacts in this community need to be carefully assessed and planned. Several years ago, the Maryland Department of Transportation and CSX Railroad considered locating an Intermodal Facility at BARC. The 120-acre proposed site would have included a 1,000 truck trips per day from the Port of Baltimore. The level of impact from this proposed BEP plan is surely much less but still requires truck trips, additional paved impervious surfaces outside the project to accommodate the projects impacts years after the decision to move forward was made, and increased traffic through the BARC where wildlife has reestablished and speed limits are strictly enforced. Undoubtedly, employees, vendors, contractors and others will look for alternative routes through the farm and surrounding communities that will not be evaluated in the canned traffic analysis completed for this DEIS exercise. I know: BARC was between my home and one of my previous workplaces in Beltsville. Those additional trips in the surrounding communities do not show up as an impact on a transportation model but have a

devastating impact on those communities that includes noise, trash, speeding, accidents, reduced property values, and then road “improvements” that alter the community.

What we see time and again is the ease of land transfer from BARC to other federal facilities that does not consider the cumulative impact of the “thousand cuts” resulting from each discreet development. There is no mechanism except better planning to reduce this. Frankly, BARC is one of the largest remaining open spaces in the Anacostia watershed. While most of the watershed has been developed we take any development of land seriously when there appears to be less impactful sites for redevelopment from our perspective. I understand that owning the land and not paying for additional land makes this site more ideal on a balance sheet. I have to use a larger “Balance sheet” to argue for doing more in these times where the government can make better decisions about land use in our watershed. The Federal government owns almost 10% of the land in the Anacostia watershed. Surely there is another federal, state, county or private site that was heavily impacted that needs restoration, that would not dissect contiguous open space, and would help revitalize the River while meeting the operational criteria for selection of this site. A second cash printing site was developed in Fort Worth, TX on municipal land that was donated to attract the development.

The neighboring land use to the west is already industrial and we ask that consideration would be given to purchasing some of that poorly developed and managed industrial area as an option. This would leave land in the BARC for higher and better preservation use and remediate/restore land that has contributed much pollution to the Anacostia River for decades. An example is the impact to wetlands at the proposed site can be mitigated from a “check in the box” perspective but those wetlands are existing: the industrial park destroyed any wetlands there years ago. Locating in that industrial area would improve stormwater management there and utilize existing roads more effectively.

In conclusion, the Anacostia Watershed Society appreciates the opportunity to provide comments on the proposed BEP move to BARC. We hope that this proposed development provides co benefits to the communities and people, natural environment, and the overall watershed in the form of sustainable practices, resiliency, protection of human health and the environment, economic development, and top-level security for the site and the operations that outweigh the impacts.

For the River,

A handwritten signature in black ink that reads "James R. Foster". The signature is written in a cursive, flowing style.

James R. Foster
President



MARYLAND ORNITHOLOGICAL SOCIETY

December 20, 2020

ATTN. Bureau of Engraving and Printing (BEP) Project EIS
US Army Corps of Engineers (USACE) Baltimore District Planning Division
2 Hopkins Plaza, 10th Floor
Baltimore, MD 21201
Email: BEP-EIS@usace.army.mil

Dear Department of Treasury and Army Corps of Engineers:

The Maryland Ornithological Society (MOS) appreciates the opportunity for comment on the Environmental Impact Statement (EIS) for the Bureau of Engraving and Printing (BEP) Project.¹ MOS favors the No Action Alternative. Aside from the loss of circa 100 acres of habitat, there will undoubtedly be considerable additional harm to birds due to habitat fragmentation and disturbance, and water quality issues.

MOS's primary concern is the paucity of data used, and the inadequacy of the EIS, in regards to the project's impacts on birds and bird habitat. For example, the EIS states that US Fish and Wildlife Service identified 12 bird migrant species with the potential to occur onsite and only 8 have actually been reported from the Region of Influence (ROI) (Pages 3-37). It is unclear where these figures originate, but they are grossly inaccurate. According to publicly available information, 170 bird species have been recorded at or adjacent to the project site (see below). MOS members have been studying and documenting the bird populations of Beltsville Agricultural Research Center for many years, and there is a wealth of data for the site. For example, a formal survey of the Beltsville Agricultural Research Center (BARC) site has been ongoing for five years now. In addition, there have been two previous Maryland Breeding Bird Atlas (BBA) 5-year projects at the site, the first dating from the 1980s. A third BBA is in its first year. Furthermore, BARC is surveyed during the MOS Fall and May Counts, and is also part of the Bowie Christmas Bird Count. All of these data are readily available on eBird, an online database maintained by the Cornell University Laboratory of Ornithology² or in the Christmas Bird Count data reports (available from National Audubon).

¹ Department of Treasury, Environmental Impact Statement Draft, November 6, 2020,
https://www.nab.usace.army.mil/Portals/63/docs/BEP/DEIS/BEP_PROJECT-Draft_EIS.pdf

² <https://ebird.org/home>

As you may be aware, a recent study has shown that North America has lost 3 billion birds, 29% of its total population, since the 1970s.³ The decline is even more marked among grassland species, which are down 53% as of 2019.⁴ The BARC site provides habitat for some of these grassland species, as well as early successional habitat and forest habitat. Many of these species are also considered by the Maryland Department of Natural Resources to be Species of Greatest Conservation Need (SGCN), including American Kestrel, Blue-winged Warbler, Eastern Meadowlark, Prairie Warbler, Red-headed Woodpecker, Savannah Sparrow, Vesper Sparrow, and Yellow-breasted Chat.⁵

The data sources cited above show that 170 species of birds have been recorded from the Poultry Road area and the two closest adjacent areas, North Dairy and Zoology/Entomology Roads, all of which would be impacted by the proposed facility (Table 1). These include breeding resident species as well as neotropical and boreal migrants, including 23 species of wood warblers. All of the SGCN species noted above, save Blue-winged Warbler, have been recorded and some found to breed there. For example, Red-headed Woodpeckers have bred in the old oaks that would be removed during construction. American Kestrel, a rapidly declining species, finds BARC one of its few strongholds with a number of successful nesting pairs. The EIS also gives the inaccurate impression that migratory birds are mere transients in the ROI, but many of the migrants stay to breed and produce more offspring. The woods just east of the proposed construction hosts several species of breeding warblers, as well as thrushes, vireos, and tanagers. The fields and brushy areas support breeding Savannah Sparrows and Eastern Meadowlarks in summer, as well as wintering species such as American Pipit.

The placing of a huge industrial facility in what is now an almost undisturbed agricultural, field and woodlot habitat will not only create local disturbance, it will also result in serious habitat fragmentation. The EIS notes significant direct loss of woodland, grassland, and wetland habitat on site. But in addition, the operation of the facility will introduce noise, light, traffic and human disturbance that will

³ Rosenberg, et al, Decline of the North American Avifauna, Science, vol 366, issue 6461, pp. 120-124, 4 October 2019, <https://science.sciencemag.org/content/366/6461/120>

⁴ North American Bird Conservation Initiative, State of the Birds 2019, <https://www.stateofthebirds.org/2019/wp-content/uploads/2019/09/2019-State-of-the-Birds.pdf>

⁵ Maryland Department of Natural Resources, Maryland State Wildlife Action Plan 2015-2025, chapter 3, Maryland's Wildlife and Species of Greatest Conservation Need, pages 39-45, https://dnr.maryland.gov/wildlife/Documents/SWAP/SWAP_Chapter3.pdf

certainly have a wider impact. There is considerable research now on the negative impacts of even distant noise and light on bird breeding success.⁶ Birds are especially sensitive to noise and light, and such “sensory pollutants” must be taken into account when assessing environmental impacts of any action.

The facility could also impact more distant BARC habitats, most notably Beaverdam Creek. This is a Tier II stream with good water quality that supports spawning anadromous fish. The EIS notes that treated sewage effluent from the BEP facility will be discharged to this small body of water; in fact, the amount of permitted discharge will be increased by 60%. Beaverdam Creek is used in winter by a wide variety of waterfowl that feed on aquatic vegetation, and is also the site of an active Bald Eagle nest. There is no serious discussion of the impact of discharge of treated effluent and how it may affect birds and other wildlife

BARC is part of the last large, relatively undisturbed area of open space and habitat between Baltimore and Washington, D.C. Recognizing its importance, as a green buffer, the Maryland National Capital Parks and Planning Commission has designated BARC in its Green Infrastructure as a “Special Conservation Area.” The Green Infrastructure designation in part is due to the fact that “This complex has vast areas of open space providing ecological hubs and wildlife corridors. The site also contains a wide variety of habitats that provides extensive research opportunities. Its placement in the green infrastructure network’s evaluation area emphasizes that any future land use of the area should be carefully considered.”⁷

This designation makes the selection of this unique site for a large industrial facility inconsistent with the values identified by the public and those of the state of Maryland and the region. There is no serious rationale given other than “siting within 30 miles of Washington.” In this age of telecommuting, multiple other industrial areas in the Metro area, decreased levels of important ecosystem services, and declining open space, this is a very weak rationale for destruction of an important natural resource. This “Special Conservation Area” continues to be whittled away, to the detriment of the identified species that are there. To allow another 100 acres to be sacrificed to development would set a precedent for other

⁶ Senzaki, M., Barber, J.R., Phillips, J.N. *et al.* Sensory pollutants alter bird phenology and fitness across a continent. *Nature* **587**, 605–609 (2020). <https://doi.org/10.1038/s41586-020-2903-7>

⁷ Approved Countywide Green Infrastructure Plan, Maryland -National Capital Park and Planning Commission, Chapter 4, Green Infrastructure Network, pages 19-20, <http://www.mncppcapps.org/planning/publications/PDFs/28/4-Green%20Infrastructure%20Network.pdf>

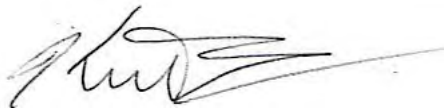
agencies, who would view the green expanses of BARC as a low-cost site for other federal buildings.

We submit that BARC is the wrong place for the new printing plant, and the BEP should seek a site that will not be detrimental to Maryland wildlife and vital green space in an otherwise developed area.

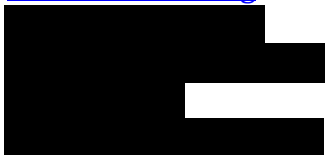
The MOS is a statewide nonprofit, volunteer organization established in 1945 and devoted to the study and conservation of birds. Currently we have 15 chapters and approximately 1,300 members. Some are scientists and naturalists, but our membership includes people of all ages and all walks of life, from physicists to firefighters, legislators to landscapers. Birding is one of the fastest growing types of outdoor recreation.

Thank you for consideration of our views, and please enter them into the permanent record.

Sincerely



Kurt R. Schwarz
Conservation Chair
Maryland Ornithological Society
www.mdbirds.org



From: Tom Taylor <[REDACTED]>
Sent: Monday, December 21, 2020 5:21 PM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: [Non-DoD Source] I support the "No Action Alternative"

Related to my comments below, I want to go on record and state my strong opposition to Treasury's Preferred alternative, and state strong support for the No Action alternative.

I also have included these comments as an attachment to this message.

Comments on BEP Draft Environmental Impact Statement

As a [REDACTED] resident and member of Beaverdam Creek Watershed Watch Group, I am concerned about negative impacts on the streams that flow through the BARC site.

An unnamed tributary of Beaverdam Creek carries surface runoff from a large part of the proposed BEP site south to Beaverdam Creek. BEP proposes to pipe wastewater from the proposed facility to the BARC wastewater treatment plant. That plant releases treated effluent directly into Beaverdam Creek.

In reference to Beaverdam Creek, the Water Resources Technical Memorandum of the EIS states:

"Beaverdam Creek has remaining assimilative capacity, which means it is able to receive additional wastewater or pollutants, in accordance with applicable TMDLs and permitting requirements, relative to current conditions while still maintaining its status as a Tier II water." (p. 6, lines 65-68)

However, the technical memorandum goes on to state the following about the overall conditions of the Anacostia Watershed, of which Beaverdam Creek is a part:

"Due to the intense development of the Anacostia Watershed, the watershed has poor ecological conditions and degraded water quality. A 2019 'report card' issued by the Anacostia Watershed Society gave the Anacostia Watershed a grade of 51 percent for overall health..." (p. 6, lines 77-79)

It makes no sense to add increased burden to one of the healthier streams when the overall watershed is rated as "degraded." This will not advance water quality improvement in the DC region.

The EIS technical memo also describes the current nature of the site as follows:

"The primarily pervious nature of the site facilitates stormwater infiltration into the ground; the site is also largely vegetated, so runoff does not contain high concentrations of pollutants or sediment." (p.7, lines 102-104)

The report then goes on to cite the proposed increase in impervious surface:

“...the Proposed Action would increase impervious surface cover on the Project Site by 29.4 acres for a total of 46.7 acres, or 38.2 percent of the Project Site. As a result, stormwater runoff volumes discharging from the Project Site to receiving waterbodies could increase, with corresponding increases in concentrations of pollutants and sediments.

As shown on Figure 3, however, Treasury would properly design, construct, and maintain GI/LID stormwater infrastructure on the Project Site that would comply with state of Maryland requirements and Section 438 of the EISA, ensuring that pre-development hydrology is maintained on-site to the maximum extent technically feasible and no significant adverse impacts related to stormwater occur. Stormwater control BMPs identified under EO 13508 would also be integrated into the Project Site design to control and reduce water pollution coming from federal facilities to protect the Chesapeake Bay and its tributaries. As such, no or negligible adverse impacts to stormwater would be expected.” (p. 12, lines 266-276)

In a time of projected significantly higher amounts of rainfall due to climate change, construction of the proposed facility would reduce the existing amount of naturally occurring filtration at the site. Though the report cites use of BMP’s “to control and reduce water pollution,” no backup data and support are provided to show how this will be accomplished specifically. Specific BMP’s also are not identified, making it difficult to assess their potential benefits in relation to the harmful effects that need to be remedied.

The technical memo cites the potential for higher stream volume as follows:

“...operation of the Proposed Action could increase water volumes downstream of the BARC East WWTP, but these increases would be minor and would result in less-than-significant adverse impacts on the flow of surface waters in the ROI, including Beaverdam Creek. (p. 12, lines 252-255)

But again, why risk some degradation of a healthy stream when the overall state of the Anacostia watershed is in poor condition, and there is no backup data that supports the above conclusion.

We also are concerned about harmful effects to wetlands at BARC. In the Draft Finding of No Practicable Alternative for Construction and Operation of a Currency Production Facility at the Beltsville Agricultural Research Center, Maryland (attached to the technical report), the report states that “approximately 0.94 acres” (about one-third) of the 2.94 acres of “wetlands identified within the Project Action Site” would be permanently affected, “and up to 2 additional acres of wetlands may be subject to temporary, construction-related effects.” (p. 2)

As the technical memo notes:

“Wetlands perform diverse hydrologic functions such as water quality improvement, groundwater recharge, pollution mitigation, nutrient cycling, and stormwater and floodwater storage. Wetlands also provide wildlife habitat and have socioeconomic benefits...” (p. 7, footnote 6)

The Greenbelt area already has suffered significant wetland loss due to previous development. In this era of climate change, habitat loss, and other ecological damage, we need to preserve and protect remaining wetlands.

Sincerely,

Tom Taylor, Member of Beaverdam Creek Watershed Watch Group



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

We hope you can accept our comments even though they are sent on December 22, 2020. Covid-19 has placed burdens on our operations that make it difficult to provide well considered comments on a prompt schedule.

Environmental Review, Inc. has reviewed the Environmental Impact Statement Draft (DEIS), and has the following comments:

Comments

1. Section 1.4 of the EIS states that the new construction of a one million square foot with a height of 40 to 50 feet would support the Treasury's long-term plan for efficient, streamlined currency production, however, the BEP has not provided an analysis of why the given space requirements were selected. Considering the Fort Worth plant (WCF) already accounts for more than 60 percent of the printing of U.S. notes, an analysis of space requirements for this facility should be conducted. This analysis should include the inventory of current plant space, the Main Building, the Annex, and the warehouse in Landover, and show how that can be accommodated in the new plant along with the space required for future needs. An analysis is important because underestimating or overestimating the plant size is an expensive error. In addition, overestimating the plant size will unnecessarily increase the environmental impact of construction and operations.
2. Section 3.1.3. There is no discussion of the extent of fuel storage on site and whether an SPCC Plan may be required for the Preferred Alternative as required under the Federal Oil Pollution Act.
3. Section 3.7.2.2 of the EIS, under Wetlands, claims that the Treasury has developed the concept site plan for the CPF in a manner that reduces potential adverse wetland impacts to the extent feasible. Table 2.2-1 which discusses environmental impact reduction procedures for water resources, however, fails to address how wetlands will be protected from fugitive dust emissions during construction of the proposed CPF. Line 1477-78 states that fugitive dust emissions would be the most likely emissions source to travel off-site. Considering Wetland #4 and Wetland #6 are within project-site boundaries, it is highly likely fugitive dust emissions will contaminate these bodies of water. This poses a hazard as increased sedimentation would alter the nutrient makeup of water as well as threaten the biomass of these wetlands. Given the construction process will occur over a period of three years, what further environmental protection measures can be put in place to mitigate the amount of fugitive dust that will settle onto these wetlands during the construction phase?

In addition, fugitive dust emissions also pose as a potential hazardous risk to children.

Lines 1562-64 state that the Vansville Recreation Center and Vansville Elementary School are approximately 1,500 feet from the project site boundary, and the Touch of Eden Daycare as approximately 1,300 feet from the site boundary. The BARC 27 location experiences wind predominantly from the south/southwest region during the spring and summer which might potentiate the risks of dust emissions reaching these schools. Particulate matter within PM 2.5 or smaller is considered dangerous as it can be absorbed by lung tissue. Due to this hazard, it is suggested that the BEP should add additional dust particle sensors near the schools during the construction phase so that children's and staff's respiratory health are not at risk.

The Phase II completed for this site identified heavy metals in the soil; albeit these appear to be at background levels. In addition, during demolition there is potential for air transport of lead, from LBP, and/or asbestos. However, there is a potential that, during the long construction period, these airborne metal particulates could be concentrated in wetlands and streams downwind via fugitive dust emissions. These may impact sensitive hydrophytic plants and aquatic species. In addition, the use history of this site as an agricultural research facility is a concern. There is a potential that underlying soils may include pesticide residue and other research-oriented contaminants which could be particulated and transported during excavation.

4. Section 3.8.2.2 of the EIS, under Wildlife, states that the construction of the Proposed Action would permanently remove approximately 83.6 acres of existing vegetated wildlife habitat within the project site. Line 1938-39 states this vegetated wildlife habitat contains numerous bird nest boxes that provide habitat for cavity-nesting bird species such as the easter blue bird (*Sialia sialis*) and tree swallow (*Tachycineta bicolor*). Line 2006-07 states that Treasury would coordinate with owners of the on-site bird nest boxes to have them relocated from the Project Site prior to construction but does not name any specific locations. What areas or regions will the on-site bird nests be relocated to? The relocation of nests should highly consider the noise levels of construction displayed in Figure 3.5-1 as birds may not settle within areas with too high of noise pollution.
5. Table 2.2-1 of the EIS states construction should be limited or avoided altogether within the nesting season of migratory birds observed between May 1 to September 10. Section ES.8, however, states that excavation activities will be conducted during late summer or early fall to minimize potential encounters of groundwater resources. As these two timelines are contradicting, how will excavation activities be limited to avoid disturbing migratory birds to the furthest extent possible? According to 3.7.2.2, excavation activities could potentially reach up to a depth of approximately 25 feet involving the demolition of existing buildings with basements and removal of underground utilities. These activities will likely involve use of loud construction vehicles and machinery which may cause large disturbance for migratory birds.

The only E and T species identified in the area is the Northern Long Eared Bat. These *chiroptera* mammals are very sensitive to loud noises also.

Sincerely,

Kobe Ramirez (Associate in California)
Environmental Reviewer
Environmental Review, Inc.
1792 Rogers Ave
San Jose, California 95112

Public Comments

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-----Original Message-----

From: Mary Ann Canter [mailto: [REDACTED]]

Sent: Monday, November 9, 2020 10:33 AM

To: BEP-EIS <BEP-EIS@usace.army.mil>

Subject: [Non-DoD Source] Comment Submission Regarding Draft EIS for BEP Project

I have read the EIS and I disagree with the statement that there are no eagles living near the proposed facility. To the contrary there is a large eagle nest on Research road which is within about one quarter mile of the proposed facility. The eagle nest has been occupied for at least thirty years if not many more. Eagles live and fledge their young most every Spring. There are also many eagles living at the Patuxent Wildlife Center, which is close and contiguous to the proposed facility. It's hard enough for an eagle to survive in the current environment, let alone in an environment with a huge manufacturing facility that operates 24 hours a day!

A manufacturing facility is not suitable to an area designated residential on land set aside for research purposes.

Mary Ann Canter

[REDACTED]

Mary Ann Canter

From: Mary Ann Canter <[REDACTED]>
Sent: Sunday, December 6, 2020 6:41 PM
To: BEP-EIS <BEP-EIS@usace.army.mil>; Keith Jahoda <[REDACTED]>
Subject: [Non-DoD Source] Fwd: Comment Submission Regarding Draft EIS for BEP Project

I wish to comment on the EIS for the proposed treasury manufacturing facility to be built on the Agricultural Research Center.

I have read the EIS and as a concerned citizen and resident of [REDACTED] I found the EIS woefully inadequate. Aside from the factual error that there are no bald eagles living near the proposed facility (there are). They have not addressed the following issues:

- What are they doing to protect the endangered northern long eared bat that lives there?
 - What are they doing to monitor and mitigate noise from the moving trucks and the production facility itself?
 - What are they doing to monitor and control light pollution from the large parking lot that will be used 24/7?
 - Have they discussed with the residents on Odell Rd. how this facility will impact their community.
 - I have heard the designated land has toxic waste on it. What will they do to clean it up?
- These were not addressed in the EIS

Mary Ann Canter
[REDACTED]

----- Forwarded message -----

From: **Mary Ann Canter** <[REDACTED]>
Date: Monday, November 9, 2020
Subject: Comment Submission Regarding Draft EIS for BEP Project
To: BEP-EIS@usace.army.mil

I have read the EIS and I disagree with the statement that there are no eagles living near the proposed facility. To the contrary there is a large eagle nest on Research road which is within about one quarter mile of the proposed facility. The eagle nest has been occupied for at least thirty years if not many more. Eagles live and fledge their young most every Spring. There are also many eagles living at the Patuxent Wildlife Center, which is close and contiguous to the proposed facility. It's hard enough for an eagle to survive in the current environment, let alone in an environment with a huge manufacturing facility that operates 24 hours a day!
A manufacturing facility is not suitable to an area designated residential on land set aside for research purposes.

Mary Ann Canter
[REDACTED]

Mary Ann Canter

--
Mary Ann Canter

-----Original Message-----

From: Mary Ann Canter <[REDACTED]>

Sent: Monday, December 21, 2020 10:47 AM

To: BEP-EIS <BEP-EIS@usace.army.mil>

Subject: [Non-DoD Source] EIS for treasury facility on BARC

Having read the woefully inadequate EIS for the proposed BEP facility, I think it is imperative that a complete assessment be completed by the Fish and Wildlife Service of the effects this building and its construction would have upon the eagles that live close to Research Rd. on the BARC Campus. This eagles nest is an integral part of the Greenbelt Community. It is visited daily in season by multiple groups and individuals from the nearby Greenbelt Homes and by bird watchers from throughout the region. Should anything happen to them there would be outcry from many and varied interested persons. Your EIS dismissed the eagles as irrelevant, however their large nest has been occupied by adults and eaglets every year within .6 miles of mainly open land. Open land is not foraging land and so the .5 mi requisite distance should be expanded to include foraging space between their nest and the proposed facility. This can only be determined by a professional raptor specialist. It is a wonder that these symbols of our nation live so close to highly developed areas and as such they may need not only safe space to forage but also specialized support to continue to live. Information about mitigation and support strategies is needed and should be included in the assessment.

Mary Ann Canter

-----Original Message-----

From: noreply@dma.mil [mailto:noreply@dma.mil]

Sent: Wednesday, November 11, 2020 3:19 PM

To: BEP-EIS <BEP-EIS@usace.army.mil>

Subject: BEP web page comments

Name John Ausema

Email Address [REDACTED]

Submit your Comments I am generally supportive of this project. Since the last in question already has decaying buildings on it, this is a reasonable use of the land.

I am concerned about impacts on bicyclists along Powder Mill Rd. The BARC area is very popular for local cyclists and all of the roads in the area get heavy cyclist use. Construction managers should think carefully about cyclist safety during construction. A wide shoulder or bike lane should be added through the new section of Powder Mill Rd, to connect to the existing wide shoulders on the road.

I think planners should also consider allowing bike/pedestrian access along the new road to the facility and along a right of way or trail on the edge (outside of) the facility to increase options for cyclist and pedestrian connections between Odell and Powder Mill roads.

There will be an increase in impervious surface from the roof and parking lot. The site should use "green infrastructure" techniques to manage stormwater rather than building large artificial retention ponds. These elements can be added between parking rows and adjacent to the lot, as well as near the building.

I would also like to see more clear information about the source of water used at the plant, and plans for treating waste water. Will water be drawn from WSSC treated water or from a local source? Will "used" water be sent to the Blue Plains or another area treatment facility, or will it be treated on site? Will those treatment plants be able to reduce discharged water to safe conditions?

thank you,

John

-----Original Message-----

From: noreply@dma.mil [mailto:noreply@dma.mil]

Sent: Wednesday, November 18, 2020 11:01 AM

To: BEP-EIS <BEP-EIS@usace.army.mil>

Subject: BEP web page comments

Name Jeff Goldman

Email Address [REDACTED]

Submit your Comments We are strongly opposed to the Bureau of Engraving and Printing constructing their 1,000,000 square foot facility within the boundary of the Beltsville Agricultural Research Center.

Prince Georges and Montgomery County Maryland have many declining and / or abandoned shopping centers and shopping malls that would be much more suitable for this type of project and wouldn't destroy our much valued and ever dwindling green space.

As examples:

- The former Landover Mall area
- The seldom used overflow parking areas for Fedex field • Forestville Plaza Shopping Center • Iverson Mall • Beltsville Industrial Park • Westfield Wheaton Mall • White Oak Shopping Center (Sears)

It would be very much preferred to re – purpose some of these declining and obsolete built upon areas as opposed to destroying more of our precious green space.

Sincerely,

Jeff and Diane Goldman

[REDACTED]

-----Original Message-----

From: T K [mailto:]

Sent: Saturday, November 28, 2020 6:11 PM

To: BEP-EIS <BEP-EIS@usace.army.mil>

Subject: [Non-DoD Source] Comment Submission Regarding Draft EIS for BEP Project

To whom it may concern,

I am writing to register my discontent with the proposed Replacement Currency Production Facility at the Beltsville Agricultural Research Center. I am a resident in [REDACTED] near BARC and would be negatively impacted by the vehicle noise and traffic. This is a wildlife refuge and is the reason I moved to this area. Please reconsider this building site.

Sincerely,

Talia Kowitt

-----Original Message-----

From: noreply@dma.mil [mailto:noreply@dma.mil]

Sent: Tuesday, December 1, 2020 10:23 PM

To: BEP-EIS <BEP-EIS@usace.army.mil>

Subject: BEP web page comments

Name Angelique Dorsey

Email Address [REDACTED]

Submit your Comments Overall I support the relocation of the currency production facilities from DC to the Beltsville Agricultural Research Center. However, I have serious concerns regarding the significant transportation impact on the surrounding subdivisions from building and operating the proposed currency production facilities at BARC. The use of Baltimore Washington Parkway (BWP) by any heavy trucks (including those used for transportation of materials and currency) should be prohibited at the Powder Mill Road (Intersection 12 and 13) or Muirkirk Road exits. The surrounding roads to these exits are already congested with residential traffic. Springfield Road (Intersection 12), which intersects with Powder Mill Road near BWP and the entrance to BARC, is a small, two lane, winding road that has various sections of low visibility. Traffic already backs up on it due to increasing use of Powder Mill Road through BARC as a cut-through to BWP. The existing character of the surrounding area is rural tier, limited development and the residents live here because of that protection. Muirkirk Road is the next north-bound exit from Powder Mill and drivers may try to use it as a back way to get to the facility by using Odell Road to access BARC through Springfield Road.

All heavy truck traffic should be required to use the Kenilworth Avenue exit off of 495 or Greenbelt Road. These roads have multiple lanes and are designed to support such use. The portion of Kenilworth Avenue that turns into Edmonston Road between Cherrywood Lane and Powder Mill Road should be widened to support the increased traffic. This can be accomplished by taking BARC land only and will relieve existing and future traffic backups caused by the narrowing of the lanes from two to one at Cherrywood Lane traffic light.

Please respect the current residents of the area and ensure the majority of the increased traffic caused by this development is directed to major transportation routes and diverted from roads that have been designed to support access to low-density development.

[REDACTED]

From: L Saffell [mailto:]
Sent: Wednesday, December 2, 2020 11:43 AM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: [Non-DoD Source] Comment Submission Regarding Draft EIS for BEP Project

Please acknowledge receipt and attentive reading of this comment.

I see NO evidence of consideration with local input of alternative sites such as the OFTEN-mentioned old **Landover Mall** location. I note that several good local comments and even good federal agency comments are without official project responses, which tells us a great deal about the nature of the project as a whole.

A BARC site location fails in so many ways: adds to existing transportation problems; negatively impacts irreplaceable natural resources; radically alters the nature of the site and surrounding communities both human and non-human; and the process appears (from the OUTSIDE) to have been largely devoid of consideration of real community engagement or dialogue.

It is NOT too late or too far along in development to reconsider this project and I urge same.

Cordially,

Linda Saffell

The site plan does not show how the site would be graded or how the stormwater would be handled in sufficient detail to determine if the small green spots shown are adequate to handle a million sf of impervious surface without damaging the downstream watershed. This project will have downstream effects on Anne Arundel County and the Chesapeake Bay. Ellicott City is a casualty of this type of flawed analysis. Any person of common sense could have predicted that Ellicott City would be affected by the complete paving over of its upstream watershed but the evaluation process did not require the developer to prove otherwise. Each project evaluated in isolation may not show the full impact yet cumulative impacts can be predicted and should be studied. We can learn from this horrific failure of foresight and should do so for this project. Increasingly frequent severe rainstorms need to be considered. Climate change is real. That the NEPA format does not require evaluation of future climate conditions is a defect of NEPA but is certainly something that needs to be considered for responsible decision making. Stormwater is not even an impact topic in this EIS.

The visual resources analysis is completely inadequate. The views show no change. There would be significant changes to the roads and to the topography in order to create a flat development site. These changes are not depicted. The before and after images offer no basis for evaluating this impact.

Sincerely,
Carolyn Mitchell

From: noreply@dma.mil <noreply@dma.mil> **Sent:**
Wednesday, December 2, 2020 9:53 PM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: BEP web page comments

Name Vijay Parameshwaran

Email Address [REDACTED]

Submit your Comments

I read through this draft EIS, and several aspects of it, and its creation, are extremely disappointing to me. Here they are below:

- 1) It says that there is minimal to no impact for environmental justice issues, but it does not address the fact that there is the Vansville unincorporated community that is mostly ethnic minority, who would be affected by the construction, chemicals, and traffic.
- 2) The EPA has cited the Bureau of Engraving and Printing for non-compliance in use of hazardous chemicals, and there is no mention (apart from a brief statement on "safe storage") on how the chemicals will be treated before release into the water; additionally, no plans are made for water cleaning/treatment before being released into the fields. This can put potentially dangerous chemicals in a pristine area that is the BARC site, as well as negatively affect the health of the people, flora, and fauna at the site.
- 3) In addition to potential contamination of the BARC fields, the Patuxent Wildlife Refuge is adjacent, so that could very well be contaminated by environmental damage.
- 4) It seems like there are deliberate attempts to keep the voices of Greenbelt residents out of this process. The City Council, despite their efforts as the voice of the people, are given no say in the process. A stakeholder meeting in December 2019 was not publicized (maybe by intent), and despite COVID-19, the EIS timeline was not changed.
- 5) A proper laboratory facility/site that has the infrastructure and controls to handle chemical processing should be chosen, not a pristine agricultural site. There are industrial park areas in PG County that would be more ideal candidates, and would provide a lot more oversight.
- 6) Because of COVID-19, this EIS process should be moved six months, so that we can participate more thoroughly in the review before pushing forward with this project.

From: noreply@dma.mil <noreply@dma.mil>
Sent: Thursday, December 10, 2020 6:34 PM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: BEP web page comments

Name	Mark Middlebusher
Email Address	[REDACTED]

Submit your Comments

To whom it may concern:

I reviewed the online version of the Traffic Impact Statement (all 876 pages!) related to this project.

1. I could not review Figure 4-6 located on page 44 as it was all black! Please change this and post an updated version. Another option is to send me a corrected page so I may review.

2. While the traffic studies may have been done according to professional guidance, I still recommend that MD 201 between Cherrywood Lane and Sunnyside Avenue should be widened to 4 lanes from its existing 2 lanes (as initially noted in comment #17 - page 213). I understand the reasonings provided in the Final Resolution, but feel like once the future traffic increases with this project, the impacts during that section will be dramatic. As a local resident, I see the current demands of this bottleneck whenever I travel down that road.

For those employees who chose to drive MD295 North coming to work, when a wreck occurs on MD295, the most feasible alternative for them will be to take MD 201 North. (those workers from Quadrant 3 - page 224). This will increase the traffic counts on this section of the road tremendously.

I recommend that the project take another look at this part of the project and reassess the impacts.

If the decision is still "No", I recommend the project write a letter to MD SHA and PGC DOPW justifying their reasoning.

Thank you.

From: noreply@dma.mil <noreply@dma.mil>
Sent: Tuesday, December 15, 2020 2:07 PM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: BEP web page comments

Name	Deanna Dawson
Email Address	[REDACTED]
Submit your Comments	<p>The proposed facility’s night-time lighting was mostly addressed as to its effect on residences along Odell Road. It’s a concern too to Greenbelt residents and others who long have taken advantage of BARC’s relatively dark skies as a locale for ‘star-gazing’. I urge that to the extent possible lighting around the facility be directed downwards rather than upwards. This will also benefit nocturnally migrating birds in spring and fall, who seek dark places to land before dawn and can be confused by night lights.</p> <p>The bird nesting season was considered with regard to land clearing and construction. This should apply also to building demolition (i.e. do with care, and outside the nesting season), since some birds likely nest or roost within buildings with open doors or windows or with holes in the roof. Note that even vultures are protected by the Migratory Bird Treaty Act, and they do provide a service, by cleaning up road-killed animals, which likely will be more common with more vehicles on Powder Mill Road.</p> <p>I’m also concerned about the noise and fumes of increased traffic on Powder Mill Road. Arrangements for additional bus and shuttle service, plus incentives for riders, should definitely be made to reduce traffic, and the size of the parking lot—nearly as large as the building! I hope that the footprint can be reduced somewhat. And I hope that the large building will accommodate solar panels on the roof (or parking lot if the size isn’t reduced).</p> <p>It sounds like there will be a large amount of wastewater generated in the production process. What will be the source of the water—was that mentioned in the DEIS?</p> <p>The DEIS adequately addresses my other concerns. It makes me sad, though, to see more of our federal open space turned into an industrial site, no matter how carefully it’s done.</p>

[REDACTED]

From: [REDACTED] <[REDACTED]>

Sent: Thursday, December 17, 2020 2:32 PM

To: BEP-EIS <BEP-EIS@usace.army.mil>

Subject: [Non-DoD Source] US Department of the Treasury Environmental Impact Statement Draft November 6, 2020

Dear Sir or Madam,

My comments on the subject document are attached. Thank you for the opportunity to provide comments.

Debbie McKinley

[REDACTED]

US DEPARTMENT OF THE TREASURY
 ENVIRONMENTAL IMPACT STATEMENT DRAFT
 NOVEMBER 6, 2020

REVIEW COMMENTS

ITEM	REFERENCE	COMMENT	ACTION
	General	In many instances, no reasoned basis is provided for conclusions reached in either the Draft Environmental Impact Statement (DEIS) or the supporting technical memoranda. The lack of these reasoned bases is a deficiency in the DEIS and should be corrected in the Final EIS.	
	General	In many instances, no reasoned basis is provided for the determination of the regions of influence (ROIs) utilized in the various analyses. The lack of these reasoned bases is a deficiency in the DEIS and should be corrected in the Final EIS. Merely stating what ROI was used is insufficient.	
	General	In some instances, information supportive of conclusions reached is not contained in either the DEIS, supporting technical memoranda, or other supporting documents. For example, neither the <i>Final Phase II Investigation Report, 104-Acre Parcel of Land Surrounding Poultry Road</i> (SIA-TPMC, LLC, 2020a) nor <i>Final Environmental Condition of Property Report 104-Acre Parcel of Land Surrounding Poultry Road</i> (SIA-TPMC, LLC, 2020b) as accessed through the Bureau of Engraving and Printing (BEP) Replacement Project website (https://www.nab.usace.army.mil/Home/BEP-Replacement-Project/) contain any appendices	

ITEM	REFERENCE	COMMENT	ACTION
		<p>and, thus, no geological profiles or soil or well boring logs. No field data sheets or analytical laboratory reports were provided in the two reports. Neither the DEIS nor supporting technical memoranda contained any soil boring or well logs and no geologic profiles were presented. The lack of necessary supporting information is a deficiency that should be corrected in the Final EIS.</p>	
	General	<p>In many instances, the environmental effects associated with the three buildings that are still in use within the Project Site (BARC's Wildlife Office and two poultry buildings) for both the No Action and Preferred Alternatives are not addressed. For completeness, the environmental effects on these three buildings for each of the identified resources (e.g., land use, visual resources, air quality, etc.) should be addressed for both the No Action and Preferred Alternatives. The lack of these analyses is a deficiency in the DEIS and should be corrected in the Final EIS.</p>	
	General	<p>In many instances, the environmental effects associated with the BEP Main Building and the BEP Annex Building for both the No Action and Preferred Alternatives are not addressed. For completeness, the environmental effects on these three buildings for each of the identified resources (e.g., land use, visual resources, air quality, etc.) should be addressed for both the No Action and Preferred Alternatives. The lack of these analyses is a deficiency in the DEIS and should be corrected in the Final EIS.</p>	

ITEM	REFERENCE	COMMENT	ACTION
	Executive Summary	Any revisions made to subsequent sections in response to comments should be reflected in the Executive Summary.	
	Table 2.2-1, Air Quality, Construction	For completeness, water spray should also be used to minimize fugitive dust emissions.	
	Table 2.2-1, Air Quality, Operation	For completeness, air emissions control equipment installed to reduce emissions of metals, volatile organic compounds (VOCs), greenhouse gasses, and other constituents should be addressed.	
	Table 2.2-1, Noise, Construction, Last Bullet	For clarity, the meaning of “off-site” as used in the context in which this term is used in the sentence should be explained. Does offsite mean beyond Beltsville Agricultural Research Center (BARC) boundaries? For completeness, the term “off-site” should be clarified.	
	Table 2.2-1, Noise, Construction, Last Bullet	It would appear that requiring construction-related heavy trucks to access the Project Site through BARC would increase impacts to noise-sensitive receptors on BARC. For completeness, the best management practices (BMPs) that will be employed to minimize impacts to noise-sensitive receptors on BARC itself should be addressed. <i>Note: This comment assumes the term “off-site” means beyond BARC boundaries.</i>	
	Table 2.2-1, Noise, Operation, First Bullet	For clarity, the meaning of “off-site” as used in the context in which this term is used in the sentence should be explained. Does offsite mean beyond BARC boundaries? For completeness, the term “off-site” should be clarified.	

ITEM	REFERENCE	COMMENT	ACTION
	Table 2.2-1, Noise, Operation, First Bullet	It would appear that requiring operation-related heavy trucks to access the Project Site through BARC would increase impacts to noise-sensitive receptors on BARC. For completeness, the BMPs that will be employed to minimize impacts to noise-sensitive receptors on BARC itself should be addressed <i>Note: This comment assumes the term “off-site” means beyond BARC boundaries.</i>	
	Table 2.2-1, Noise, Operation, Last Bullet	For completeness, the BMPs that will be employed to reduce or avoid interior noise should be identified.	
	Table 2.2-1, Geology, Topography, and Soils, Construction	It is not clear from the information presented how the stormwater management activities discussed will reduce potential adverse environmental impacts on the geology and topography on the project site. For completeness, the Environmental Protection Measures (EPMs) that will be undertaken to reduce potential adverse environmental impacts resulting from altering the geology and topography of the Project Site should be addressed.	
	Table 2.2-1, Geology, Topography, and Soils, Operation	For completeness, the EPMs that will be undertaken over the life of the project to minimize erosion and sedimentation from the revegetated areas should be addressed.	
	Table 2.2-1, Water Resources, Construction, Seventh Bullet	It appears “or” should be “on” in this sentence. Please correct.	

ITEM	REFERENCE	COMMENT	ACTION
	Table 2.2-1, Water Resources, Construction	For completeness, the BMPs that will be employed to maintain the existing hydrologic function of the wetland in the southeast corner of the Project Site to the extent practicable should be addressed.	
	Table 2.2-1, Water Resources, Operation	For completeness, the EPMs that will be undertaken to maintain the existing stream flow and hydrologic function of the stream over the life of the project should be addressed.	
	Table 2.2-1, Water Resources, Operation	For completeness, the EPMs that will be employed to maintain the existing hydrologic function of the wetland in the southeast corner over the life of the project should be addressed.	
	Table 2.2-1, Water Resources, Operation	For completeness, the BMPs that will be employed to manage and reduce pollution flowing from the Project Site into the Chesapeake Bay and its tributaries over the life of the project should be addressed.	
	Table 2.2-1, Water Resources, Operation	For completeness, the BMPs that will be employed to maintain any detention or retention ponds and green infrastructure/low-impact development (GI/LID) techniques such that they function optimally over the life of the project should be addressed.	
	Table 2.2-1, Water Resources, Operation	For completeness, the BMPs that will be employed to comply with the existing discharge permit issued by the Maryland Department of the Environment (MDE) for the BARC East Wastewater Treatment Plant (WWTP) over the life of the project should be addressed.	

ITEM	REFERENCE	COMMENT	ACTION
	Table 2.2-1, Water Resources, Operation	For completeness, the BMPs that will be employed to stay within the design capacity of the BARC East WWTP over the life of the project should be addressed.	
	Table 2.2-1, Water Resources, Operation	For completeness, the EPMs that will be employed to conserve, reuse, and recycle potable water supplied by WSSC to the central chilled water and hot water plant over the life of the project should be addressed.	
	Table 2.2-1, Water Resources, Operation	For completeness, the BMPs and regulatory compliance measures (RCMs) that will be employed regarding the onsite wastewater treatment facility that will collect and recycle wiping solution and potentially plating line water over the life of the project should be addressed.	
	Table 2.2-1, Biological Resources, Operation	For completeness, the EPMs that will be employed to maintain the biological health and function of the existing stream and southeast corner wetland over the life of the project should be addressed.	
	Table 2.2-1, Utilities, Construction	For completeness, the Miss Utility requirements to give notice at least two full business days prior to the day work is to begin should be addressed.	
	Table 2.2-1, Utilities, Operation	For completeness, the Miss Utility requirements to give notice at least two full business days prior to the day work is to begin should be addressed.	
	Table 2.2-1, Hazardous and Toxic Materials	For completeness, the specific BMPs that will be employed to minimize impacts from accidental releases or potential discharge of Hazardous and	

ITEM	REFERENCE	COMMENT	ACTION
	and Waste, Construction	Toxic Materials and Waste (HTMW) should be identified.	
	Table 2.2-1, Hazardous and Toxic Materials and Waste, Construction	For completeness, the specific BMPs and RCMs associated with spill and leak prevention and response procedures should be identified.	
	Table 2.2-1, Hazardous and Toxic Materials and Waste, Operation	For completeness, the specific BMPs and RCMs that will be employed to reduce the generation of HTMW over the life of the project should be identified.	
	Table 2.2-1, Hazardous and Toxic Materials and Waste, Operation	For completeness, the specific BMPs and RCMs that will be employed to recycle HTMW over the life of the project should be identified.	
	Table 2.2-1, Hazardous and Toxic Materials and Waste, Operation	For completeness, the specific BMPs that will be employed to minimize impacts from accidental releases or potential discharge of HTMW should be identified.	
	Table 2.2-1, Hazardous and Toxic Materials and Waste, Operation	For completeness, the spill and leak prevention and response BMPs and RCMs that will be employed over the life of the project should be addressed.	
	Table 2.2-1, Hazardous and Toxic Materials	For completeness, the release reporting and clean up BMPs and RCMs that will be implemented over the life of the project should be addressed.	

ITEM	REFERENCE	COMMENT	ACTION
	and Waste, Operation		
	Table 2.2-1, Hazardous and Toxic Materials and Waste, Operation	For completeness, the HTMW transportation and disposal BMPs and RCMs that will be implemented over the life of the project should be addressed.	
	Table 2.2-1, Human Health and Safety, Construction	For completeness, the BMPs and RCMs associated with the Occupational Safety and Health Administration (OSHA) compliance should be addressed or the text revised to clarify that the actions presented will comply with OSHA.	
	Table 2.2-1, Human Health and Safety, Construction	For completeness, the need for environmental monitoring and associated BMPs and RCMs that will be implemented should be addressed.	
	Table 2.2-1, Human Health and Safety, Operation	For completeness, the BMPs and RCMs associated with OSHA compliance over the life of the project should be addressed or the text revised to clarify that the actions presented will comply with OSHA.	
Line 989		No mention is made of the status of BARC's Wildlife Office and two poultry buildings under the No Action Alternative. Would the US Department of Agriculture (USDA) continue to operate these buildings? What would happen to the unused 200 Area buildings under the No Action Alternative? For completeness, the future of the 200 Area buildings under No Action Alternative should be addressed.	

ITEM	REFERENCE	COMMENT	ACTION
	Lines 992-994	Unlike the description of the Preferred Alternative, the description of the No Action Alternative is presented in a biased manner by using descriptors such as “deficient”, “inefficient”, “less secure”, and “higher risk”. The No Action Alternative should be described in an objective manner as is done for the Preferred Alternative. The word “deficient” as well as the last sentence should be deleted.	
	Line 1002	The statement that the parcel is unused appears inconsistent with the previous statement that three buildings are still in use within the parcel: BARC’s Wildlife Office and two poultry buildings. These two statements should be reconciled.	
	Table 3.1-2, Geology, Topography, and Soils, Geology	No justification is provided for the assertion that no impacts to geology are anticipated because no excavation is proposed beyond 25 feet below ground surface (bgs). As defined in the Technical Memorandum, Lines 7 and 8, geology refers to the structure and configuration of both surface and subsurface features. Per both the <i>Final Phase II Investigation Report, 104-Acre Parcel of Land Surrounding Poultry Road</i> and <i>Final Environmental Condition of Property Report 104-Acre Parcel of Land Surrounding Poultry Road</i> , the geology at BARC consists of Lower Cretaceous sediments of the Potomac Group, which consists of the Patuxent, the Arundel, and the Patapsco Formations. The Patuxent and Patapsco Formations are composed primarily of sand and gravel. The Property lies on the Patuxent Formation. Soil borings and temporary groundwater monitoring wells were installed on	

ITEM	REFERENCE	COMMENT	ACTION
		<p>the Parcel, yet both reports identified above as accessed through USACE BEP website did not contain any appendices and, thus, no geological profiles or soil or well borings logs. Therefore, no documentation is provided to support the assertion that no impacts to geology are anticipated. Information should be included in the DEIS to support this statement. Merely stating there are no impacts does not make it a reality.</p>	
	<p>Lines 1133-1135</p>	<p>The reasoned basis for this determination is not provided. As defined, less-than significant adverse impacts would not exceed the significance thresholds specified for the resource area. What are the specific significance thresholds against which the land use impacts under the No Action Alternative are compared to arrive at the stated determination? What are the expected adverse impacts on land use anticipated due to the continued deterioration of existing facilities and why specifically are these impacts less-than significant? A reasoned basis for this determination should be provided.</p>	
	<p>Lines 1146-1147</p>	<p>The specific ways nearby land uses would be affected by construction should be clearly identified for completeness.</p>	
	<p>Lines 1147-1149</p>	<p>The specific ways land use impacts on nearby public areas will be mitigated by obstructing views of the construction area should be identified for completeness. The mitigation measure of temporary privacy fencing would appear to mitigate visual resources rather than land use.</p>	

ITEM	REFERENCE	COMMENT	ACTION
	Lines 1149-1151	Although similar construction activities to the Proposed Action have occurred within the ROI, construction of the Proposed Action does not appear to be typical for BARC. This more localized impact on BARC should be addressed for completeness.	
	Lines 1161-1162	Although Treasury's operational activities in its proposed parcel may be consistent with other industrial facilities in the ROI in terms of intensity, the intensity of Treasury's activities does not appear to be typical for BARC. This more localized impact on BARC should be addressed for completeness.	
	Section 3.3	The number and location of viewpoints appears inadequate to fully evaluate the visual impacts of the Preferred Alternative. No viewpoints associated with the BARC buildings located along Animal Husbandry Road or North Dairy Road are addressed.	
	Line 1235	No basis for the assertion that the most prominent views of the Project Site occur along short segments of Odell Road and Powder Mill Road is provided. Why are these views considered more prominent than those from the BARC buildings along Animal Husbandry Road? The viewpoint from the BARC buildings has the potential to be more prominent than the viewpoint along Powdermill Road (see Viewpoint 6). A reasoned basis for the assertion should be provided.	

ITEM	REFERENCE	COMMENT	ACTION
	Figure 3.4-2	<p>The use of different ROIs for the air quality analysis is unclear and confusing. It was stated that the ROI for the air quality analysis is Prince George's County and the NCR, yet the ROI identified previously is as shown in this figure. Additionally, the evaluation of impacts on sensitive receptors is based on the ROI shown in the figure. For clarity and completeness, the basis for utilizing two separate ROIs should be explained and justified.</p>	
	Lines 1438-1440	<p>Disagree with the stated determination and reasoning. The buildings would not remain in their current condition over time but would continue to deteriorate further. Any hazardous (e.g., asbestos, lead from lead-based paint, mercury, PCBs, pesticides, herbicides, laboratory chemicals and various petroleum-based products) or other materials (e.g., fugitive dust) contained in the buildings may be released as buildings collapse and materials degrade. This degradation would, therefore, generate new air pollutant emissions. For completeness, the DEIS should address the potential for toxic and hazardous air pollutant (HAP) and fugitive dust emissions to occur in the future due to building deterioration.</p>	
	Lines 1454, 1455	<p>This statement appears misleading. While the Proposed Action would have a beneficial impact on air quality within Prince George's County and the NCR, the Proposed Action would have a negative impact on air quality in the ROI shown in Figure 3.4-2.</p>	

ITEM	REFERENCE	COMMENT	ACTION
	Lines 1579, 1580	This statement appears misleading. For those BARC buildings south-southwest of the project site, the minimal vegetation present and topography would not appear to help to block construction noise during a normal daytime construction shift. Thus, it is unclear how the estimated maximum sound levels experienced by receptors at and within these BARC buildings can be assumed to be below 75 dBA. A reasoned basis for the assertion as it applies to the nearby BARC buildings should be presented.	
	Lines 1646, 1647	Disagree that the No Action Alternative would have no impact on soil resources. As the buildings deteriorate, there would appear to be the potential for used oils, PCBs, asbestos, lead, mercury, pesticides, herbicides, and laboratory chemicals to be released into the environment and to result in soil contamination (see Final Environmental Condition of Property Report 104-Acre Parcel of Land Surrounding Poultry Road). The presence of these chemicals in soil may affect the ability to reuse these soils.	
	Lines 1659-1660	BARC's municipal separate storm sewer system (MS4) permit contains a goal of achieving a 20-percent reduction of impervious surface area by 2025 (see <i>Demolition of 22 Buildings at the Henry A. Wallace Beltsville Agricultural Research Center, ARS 2020</i>). It is not clear how increasing the impervious surface cover on the Project Site by 29.4 acres is compatible with this goal. Please clarify the compatibility of increasing the impervious surface cover with the stated goal.	

ITEM	REFERENCE	COMMENT	ACTION
	Line 1684	It would appear that maintenance and/or revegetation measures may need to be implemented in order to ensure that no exposed soil would occur on the Project Site. The need for such an ECM should be addressed for completeness.	
	Lines 1827-1829	No supporting information is provided for this conclusion. No discharge data are provided for the receiving wastewater treatment plant (WWTP) to support the assertion that 120,000 gallons per day (GPD) of wastewater discharges would be a minor increase in the existing flow of Beaverdam Creek. No flow data for Beaverdam Creek are provided. No hydraulic calculations are provided showing the capacity of the Beaverdam Creek streambed and no calculations are provided to show that an additional 120,000 gpd discharge would be a minor increase and would result in less-than-significant adverse impacts on the flow of Beaverdam Creek. The information identified above should be provided. Merely stating increases would be minor does make it a reality.	
	1839-1842	BARC's MS4 permit contains a goal of achieving a 20-percent reduction of impervious surface area by 2025 (see <i>Demolition of 22 Buildings at the Henry A. Wallace Beltsville Agricultural Research Center, ARS 2020</i>). It is not clear how increasing the impervious surface cover on the Project Site by 29.4 acres is compatible with this goal. Please clarify the compatibility of increasing the impervious surface cover with the stated goal.	

ITEM	REFERENCE	COMMENT	ACTION
	Figure 3.11-1	For completeness, the sanitary sewer that conveys wastewater from buildings within and surrounding the Project Site to the USDA WWTP should be shown in the figure. Also, the potential connection to the sanitary sewer should be shown in the figure.	
	Table 3.11-1	No documentation is provided to support the assertion that the USDA owned and operated WWTP has sufficient capacity. What is the design capacity of the WWTP? What is the current wastewater inflow to the WWTP? What is the anticipated total inflow (BARC facilities plus the CPF) to the WWTP under the Preferred Alternative? Documentation should be provided to show the WWTP does, in fact, have sufficient capacity to accept the CPF wastewater discharge.	
	Section 3.11.2.2	It is not clear why onsite wastewater treatment is not discussed in this section. Is this treatment not considered a utility? If not discussed in this section, suggest a reference to Section 3.13 be added to the text.	
	Line 2478	The anticipated environmental impacts of the construction of the approximately one mile of new force main to tie into the USDA's existing sanitary sewer system south of the Project Site should be discussed for completeness.	
	Lines 2488-2491	The fate of stormwater resulting from the decoupling the stormwater and sanitary sewer systems is not addressed under Section 3.7.2. For completeness, the fate of the stormwater that would no longer be routed through the sanitary	

ITEM	REFERENCE	COMMENT	ACTION
		sewer system should be addressed as an environmental impact of the Preferred Alternative.	
	Lines 2737-2738	This statement is misleading. Per the Final Environmental Condition of Property Report, the age of the existing buildings within the Project Site likely contain lead-based paint, PCBs, asbestos-containing materials (ACM), petroleum-related products, and mercury and PCBs in fluorescent lights and ballasts. Also present may be electrical waste in the form of electrical cabinets, microscopes, computers, and monitors; refrigerants in air conditioning units; and miscellaneous laboratory chemicals. Therefore, although the USDA does not use hazardous materials or generate hazardous waste at the Project Site, hazardous materials and/or hazardous waste are present on the Project Site. The environmental condition of the Project Site as it relates to hazardous and toxic materials and waste (HTMW) should be fully presented.	
	Section 3.13.2.1	If pesticides, herbicides, and laboratory chemicals could potentially have been disposed of via the sanitary sewer, would not these substances be released to the surrounding soil as the sewer lines deteriorate? As the buildings deteriorate, would not these released substances potentially migrate into the storm and/or sanitary sewer systems and then into the surrounding soils as the lines deteriorate? The fate of the HTMW present within the project site should be addressed for completeness.	

ITEM	REFERENCE	COMMENT	ACTION
	Lines 2749-2752	<p>The determination of a less-than-significant adverse impact is unclear. Treasury defined a significant adverse impact as one that would result in an increase in the potential for soil, surface water, or groundwater contamination within the ROI that could increase human health or ecological risk. The continued release of existing contaminants into the environment by deteriorating buildings would result in an increase in the concentration of these contaminants in soil, surface water, or groundwater above existing concentrations. Any increase in contaminant concentrations would in and of themselves increase in the potential for soil, surface water, or groundwater contamination. Additionally, any increase in contaminant concentrations would in and of themselves increase human health or ecological risk above those risks currently present. Given the foregoing, it is not clear why the continued disintegration of the existing buildings would not result in a significant adverse impact. Significant impacts cannot be ruled out because no information is provided on the volume of lead-based paint, ACM, and other HTMW present within the Project Site that could potentially be released. Thus, the possibility exists that projected future concentrations of contaminants in soil, surface water, and groundwater would result in a significant adverse impact. A reasoned basis for the determination of a less-than-significant-impact rather than a significant impact should be provided.</p>	

ITEM	REFERENCE	COMMENT	ACTION
	Lines 2781-2782	The DEIS should identify the chemicals that will be treated by the onsite plant, identify the type or types of wastewater treatment processes proposed for installation and why these processes were selected, discuss the expected treatment efficiencies of these processes, discuss the expected discharge concentrations for each of the chemicals to be treated, and discuss how these discharge concentrations compare to local, state, and federal standards.	
	Section 3.14.2.1	No discussion is provided regarding how the continued deterioration of the BARC buildings within the Project Site and the presence of hazardous materials and/or substances in these buildings could pose a potential human health and safety risks. The populations (e.g., maintenance workers, security personnel) that would be potentially exposed to hazardous substances and physical hazards as the buildings deteriorate are not identified. The means by which these populations may be exposed to both chemical (inhalation, direct contact, etc.) and physical hazards (e.g., maintaining the building structure and maintaining security) are not identified. In considering health and safety risks at other deteriorating buildings on BARC, BARC determined that the safety, security, and maintenance risks would be substantial. BARC also determined that the deteriorating buildings pose a safety and health risk to workers due to their structural condition and the presence of potentially hazardous materials and that these building conditions would make maintaining	

ITEM	REFERENCE	COMMENT	ACTION
		security on BARC (see the <i>Demolition of 22 Buildings at the Henry A. Wallace Beltsville Agricultural Research Center, ARS 2020</i>). A discussion of how the continued deterioration of the BARC buildings within the Project Site and the presence of hazardous materials and/or substances in these buildings could pose a potential human health and safety risks should be presented for completeness.	
	Section 5.0	Any revisions made to previous sections in response to comments should be reflected in this section.	
<i>End of comments.</i>			

From: Gretchen Schock <[REDACTED]>
Sent: Thursday, December 17, 2020 4:09 PM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: [Non-DoD Source] Proposed BEP in Greenbelt

As a local small business located in Old Greenbelt, within Roosevelt Center, I am excited to see new business being brought into the area especially the Bureau of Engraving. My father, Randall Schoch, was an engraver with the Bureau, he has since retired. But memories of touring the facilities as a child hold a special place for me. I look forward to welcoming your staff into our wonderful community of Greenbelt.

Best of luck!

Gretchen Schock
owner of Bee Yoga Fusion

--

Gretchen Schock
Owner of Bee Yoga Fusion Studio, ERYT-500hr Yoga Instructor, Personal Trainer and Health & Life
Coach: www.BeeYogaFusion.com
[REDACTED]
Coaching Blog: www.gretchenschock.com

From: Al Burgoon <[REDACTED]>
Sent: Friday, December 18, 2020 10:56 AM
To: Douglas Bolt <[REDACTED]>
Cc: BEP-EIS <BEP-EIS@usace.army.mil>; Kiki Theodoropoulos <[REDACTED]>
Subject: [Non-DoD Source] Re: A few wording changes

Doug, thanks for the edits.

Malissa, please use this version of Doug instead of my original version. Be aware that there are several excel pages accessible at the bottom of the one document.

Regards,

Al Burgoon

On Thu, Dec 17, 2020, 1:57 PM Al Burgoon <[REDACTED]> wrote:

Good. Thanks. Al

On Thu, Dec 17, 2020, 12:59 PM Doug Bolt <[REDACTED]> wrote:

Al,

My few suggested changes are included in the clip below.

doug

My comments concern a bald eagle nest located to the east of Research Road at position: 39.02415 – 76.87600. I and others have observed bald eagles nesting and breeding there for about 15 years. The location is about 3000 feet from the intersection of Powder Mill Rd. and Poultry Road, which is the BEP facility's proposed site.

We have a club called BARCBird, which met monthly to go birding over that period. We started collecting data on the actual birds in 2011 (see the excel file attached). Meetings have been suspended during Covid.

BARCBird is composed of BARC employees and a few other bird enthusiasts.

Woodie Martin of National Wildlife Service banded eaglets on several occasions about 2013 -2015. The bald eagles have bred successfully in most years during that time span.

We saw eagles at almost every meeting of BARCBird.

The eagles feed on fish, turtles, and other birds. They would range over large areas, including the proposed location of the new BEP Facility. We would observe them flying and perching over the sewage pond and open fields to the west of the nest site.

There is also a great blue heron rookery about 1000 ft. further east of the eagle nest.

The area to which I refer is a National Research Forest.

I worked at the Beltsville Agricultural Research Station in Building 306 and National Agricultural Library from 1981 off and on until 2006 when I retired.

--

Doug Bolt

Google Maps Research Rd



Imagery ©2020 Commonwealth of Virginia, Maxar Technologies, Sanborn, U.S. Geological Survey, USDA Farm Service Agency, Map data ©2020 200 ft



Research Rd

Maryland



Directions



Save



Nearby



Send to your phone



Share

2011-2012 Data

Bird/Date	1-Dec	17-Feb	16-Mar	18-May	15-Jun	20-Jul	17-Aug	21-Sep	19-Oct	16-Nov
blue-gray gnatcatcher										
goldfinch						10				
purple finch								1	10	
red-eyed vireo										
white eyed vireo								1		

KEY

H- heard but not seen

2013 Data

Bird/Date	18-Jan	13-Feb	15-Mar	17-May	21-Jun	20-Sep
bald eagle	2		2	3		2
red shouldered hawk	1		3	1		1
Osprey				1		
red tailed hawk	1		3			1
Goshawk						
Cooper's Hawk						
Northern Harrier	1					
Merlin						
kestrel			4		1`	
Turkey Vulture	1		8		1	
Black vulture						2
Great Horned Owl			1			
fish crow	1		yes	yes		
American crow	12		yes	yes		20
starlings	30		200	yes		
Redwing Blackbird			1	12	8	20
common grackles				4		40
meadowlark				1		
cardinal	10		2	5	6	
blue jay	10		5	yes		
American Robin	5		1	2		
mockingbird	4		2	6	8	20
yellow billed cuckoo				1	2	
brown thrasher				1	1	
Carolina chickadee	5		1	1		
tufted titmouse						
white throated sparrow	10		3			
white crowned sparrow	1					
song sparrow						
savannah sparrow						
tree sparrow	2					
Lincoln's sparrow	1					
grasshopper sparrow				maybe		
chipping sparrow						
Eastern towhee						
house sparrow						
eastern bluebird	1		6	4	5	
blue grosbeak						
Tundra swan						
American coot	30		12			
Ring necked duck			12			
mallard	4		6	4		10
black duck			2			
northern shoveler						1
Canada goose	5		6	25		
snow geese						

2013 Data

Bird/Date	18-Jan	13-Feb	15-Mar	17-May	21-Jun	20-Sep
gadwall	4		4			
lesser scaup			12			
buffelhead						
red headed duck						
Wood duck			6	7	5	
Ruddy Duck	4		4			
Long tailed duck						
American Widgeon			6			
Green Winged Teal						
cormorant, double crested						
pie billed grebe						
horned grebe			1	1		
red necked grebe						
eared grebe						
ring billed gull						
herring gull						
great blue heron	1		1			
green backed heron					1	
Greater Yellowlegs				3		
Lesser Yellowlegs				6		6
killdeer			2			
solitary sandpiper						1
sandpipers						
Spotted Sandpiper				3		
Least Sandpiper				20		
Semipalmated Sandpiper				12		
Semipalmated Plover				3		
doves	50		3	15		30
pigeons					4	
Carolina Wren	1H		1	2		2H
house wren						
Brown Creeper						
Downy woodpecker	12		6	4		
Northern Flicker	3					
red bellied woodpecker	6		5			
pilliated woodpecker			1			
red headed woodpecker						
palm warbler						
black throated blue warbler						
magnolia warbler				1		
redstart						
common yellowthroat				1	6H	
barn swallow			2	8	8	
tree swallow	1		20	15	12	
chimney swift						
orchard oriole				4	4	

2013 Data

Bird/Date	18-Jan	13-Feb	15-Mar	17-May	21-Jun	20-Sep
Baltimore oriole					2?	
indigo bunting				6	1	
cedar waxwing						
eastern phoebe			1		1	1
acadian flycatcher				1		
kingbird					1	
glue-gray gnatcatcher				3		
goldfinch				2		
purple finch						
Red-eyed Vireo				2		
white eyed vireo				1		

KEY

H- heard but not seen

2014 Data

Bird/Date	21-Feb	21-Mar	18-Apr	18-Jul	15-Aug	17-Oct	21-Nov	19-Dec
bald eagle	1	2	3*	1		2	2	
red shouldered hawk						2		2
Osprey								
red tailed hawk		1	1	1			4	1
Goshawk			0.5					
Cooper's Hawk			0.5			1		
Sharp Shinned Hawk								1
Northern Harrier		1				1		
Merlin								
kestrel		1		1	4	2		
Turkey Vulture					1	2	2	
Black vulture					4			
Great Horned Owl								
Barred Owl								
fish crow								1
American crow	20	20				3	200	300
starlings				6				15
Redwing Blackbird	5		1	2		16		8
common grackles	2							
meadowlark		15	1					
cardinal	3		1	8				
blue jay	2	1	5			2	1	5
American Robin		12		2	6		4	1
mockingbird		2		6	5	4		3
yellow billed cuckoo				1H				
brown thrasher								1
Carolina chickadee						4	4	
tufted titmouse			1			2		
white throated sparrow							12	8
white crowned sparrow								
song sparrow		6						6
savannah sparrow			5					
Baird's sparrow								
tree sparrow								
Lincoln's sparrow								
grasshopper sparrow								
chipping sparrow				2				
Eastern towhee								1
house sparrow								
eastern bluebird			5	6	2		6	1
blue grosbeak								
rose breasted grosbeak						1		
Tundra swan			1**					1
American coot	10	20	8			3	6	6
Ring necked duck	5	2	3					
mallard	12	1	1		1		2	8

2014 Data

Bird/Date	21-Feb	21-Mar	18-Apr	18-Jul	15-Aug	17-Oct	21-Nov	19-Dec
red headed woodpecker			2					
palm warbler						2		
black throated blue warbler						1		
black and white warbler						1		
yellow rumped warbler						3		
magnolia warbler								
Northern parula								
redstart								
common yellowthroat								
barn swallow		4						
tree swallow					1			
rough winged swallow								
chimney swift				6		25		
orchard oriole								
Baltimore oriole								
indigo bunting				1H				
cedar waxwing								
eastern phoebe		1				2		1
acadian flycatcher								
flycatcher spp.						1		
kingbird				4				
glue-gray gnatcatcher					2			
goldfinch				2		15	1	2
house finch							25	
purple finch								
Red-eyed Vireo				2				
white eyed vireo			2					
kinglet, red crowned						3	2	
Lousiana waterthrush								
wild turkey								
scarlet tanager								
summer tanager								
ruby throated hummingbird								

KEY

H- heard but not seen

* 2 babies on 4/21

** on 4/21

2015 Data

Bird/Date	17-Apr	15-May	19-Jun	17-Jul	20-Nov	18-Dec
bald eagle	2	2	1			1
red shouldered hawk						
Osprey						
red tailed hawk			1			
Goshawk						
Cooper's Hawk						
Sharp Shinned Hawk				1		
Northern Harrier					1	
Merlin						
kestrel				1		
Turkey Vulture		2	2		20	
Black vulture						
Great Horned Owl						
barred owl		H				
fish crow						
American crow		4	2	1	40	30
starlings	20	20		30	1	
Redwing Blackbird	5	10	2	20	1	
common grackles			3			
meadowlark				1		
cardinal			5	2	2	
blue jay						2
American Robin	2	10	3	7		
mockingbird	1	1	2	5		1
yellow billed cuckoo		1	1			
brown thrasher						
Carolina chickadee	3		1		3	
tufted titmouse	2				2	
white throated sparrow	4				4	5
white crowned sparrow						
song sparrow	2					
savannah sparrow	5					
baird's sparrow	1?					
tree sparrow						
Lincoln's sparrow						
grasshopper sparrow				10		
chipping sparrow	2	1				
Eastern towhee					1H	2
house sparrow	1					
eastern bluebird						
blue grosbeak				2		
rose breasted grosbeak		1				
Tundra swan						
American coot	3				15	12
Ring necked duck	1	1	2		1	1
mallard	1	1			8	2

2015 Data

Bird/Date	17-Apr	15-May	19-Jun	17-Jul	20-Nov	18-Dec
black duck					4	1
northern shoveler	1					10
Canada goose	2	2			30	
snow geese						
gadwall	3				8	20
lesser scaup						
buffelhead					4	
red headed duck						
Wood duck		5	6	1	6	
Ruddy Duck					10	
Long tailed duck						
Pintail						
American Widgeon						
Green Winged Teal					2	5
cormorant, double crested						
pie billed grebe						
horned grebe						
red necked grebe						
eared grebe						
ring billed gull						
herring gull						
great blue heron				2		
green backed heron						
blue winged teal	2					
Greater Yellowlegs						
Lesser Yellowlegs						
killdeer		1		2		
solitary sandpiper		1				
sandpipers						
Spotted Sandpiper		3				
Least Sandpiper		6				
Semipalmated Sandpiper		5				
Semipalmated Plover						
doves	2		5	2		
pigeons				7	20	10
Carolina Wren			6	2H	1	
house wren						
Brown Creeper						
Downy woodpecker		1			2	
hairy woodpecker						
Northern Flicker						2
red bellied woodpecker					2	
pilliated woodpecker		1				
red headed woodpecker						
palm warbler						
black throated blue warbler						

2015 Data

Bird/Date	17-Apr	15-May	19-Jun	17-Jul	20-Nov	18-Dec
black and white warbler		h				
yellow rumped warbler	3					
magnolia warbler						
Northern parula			4			
redstart						
common yellowthroat			1H	1H		
barn swallow		4		5		
tree swallow	20	12	2	10		
rough winged swallow				3		
chimney swift			3			
orchard oriole		3		4		
Baltimore oriole						
indigo bunting		1		1H		
cedar waxwing			5			
eastern phoebe		2		2		
acadian flycatcher		1				
flycatcher spp.			1			
kingbird						
glue-gray gnatcatcher	3		4			
goldfinch	2	5		10	1	
house finch	5					
purple finch						
Red-eyed Vireo		h				
white eyed vireo						
kinglet, red crowned					2	
Louisiana waterthrush	2					
wild turkey		1				
scarlet tanager			1			
summer tanager						
ruby throated hummingbird			1			

KEY

H- heard but not seen

Total species observed

23

2016 Data

Bird/Date	15-Jan	18-Mar	15-Apr	17-Jun	19-Aug	21-Oct
bald eagle	1	1	2	1	1	1
red shouldered hawk			2			
Osprey						
red tailed hawk	1			1		1
Goshawk						
Cooper's Hawk						
Sharp Shinned Hawk		1			1	
Northern Harrier	1					
Merlin						
peregrine falcon						1
kestrel			1		3	1
Turkey Vulture	3	3	8	4	1	1
Black vulture						
Great Horned Owl						
barred owl						
fish crow						
American crow	10	6	4		2	20
starlings	30	6	4	10	10	6
Redwing Blackbird			5	1	10	1
rusty blackbird	2					
common grackles						
meadowlark			2			
cardinal		1	4	2		
blue jay	2	1	1			
American Robin		12	10	1		
mockingbird			2			
yellow billed cuckoo						
brown thrasher						
Carolina chickadee		1	5			
nuthatch, white breasted	1	1	1			
tufted titmouse						
white throated sparrow	4	1	5			
white crowned sparrow						
song sparrow			3		1h	6
savannah sparrow						
baird's sparrow						
tree sparrow						
sparrow, field						1
Lincoln's sparrow						
grasshopper sparrow						
chipping sparrow						
Eastern towhee	2					2
house sparrow			2			
eastern bluebird			7	2	1	4
blue grosbeak				2		
rose breasted grosbeak						

2016 Data

Bird/Date	15-Jan	18-Mar	15-Apr	17-Jun	19-Aug	21-Oct
Tundra swan						
American coot	8	8	6			
Ring necked duck		6				
mallard	12	2	6			2
black duck						
northern shoveler	8	10	4			
Canada goose			3		2	
snow geese						
gadwall	6	1	4			
lesser scaup		1				
buffelhead	1	1				
red headed duck		1				
Wood duck	2	5	4		2	
Ruddy Duck	1	6	2			3
Long tailed duck						
Pintail						
American Widgeon						
Green Winged Teal		1	4			2
cormorant, double crested						
piebilled grebe						
horned grebe						
red necked grebe						
eared grebe						
ring billed gull						
herring gull						
great blue heron						
green backed heron						
blue winged teal			12			
Greater Yellowlegs						
Lesser Yellowlegs						
killdeer			1			16
solitary sandpiper			1			
sandpipers						
Spotted Sandpiper						
Least Sandpiper						
Semipalmated Sandpiper						
Semipalmated Plover						
doves	1				25	1
pigeons						
Carolina Wren						
house wren						
Brown Creeper						
Downy woodpecker						
hairy woodpecker	1					
Northern Flicker	1		1			
red bellied woodpecker	1	1				

2016 Data

Bird/Date	15-Jan	18-Mar	15-Apr	17-Jun	19-Aug	21-Oct
pilliated woodpecker						
red headed woodpecker						
palm warbler			1			
black throated blue warbler						
black and white warbler						
yellow rumped warbler						
magnolia warbler						
Northern parula						
redstart						
common yellowthroat						
barn swallow						
tree swallow		8	20	10		
rough winged swallow						
chimney swift					1	
orchard oriole						
Baltimore oriole						
indigo bunting				H		
cedar waxwing						
eastern phoebe			1			
acadian flycatcher						
flycatcher spp.						
kingbird						
glue-gray gnatcatcher		8				
goldfinch						
house finch						
purple finch						
Red-eyed Vireo					1H	
Vireo, blue headed						
white eyed vireo						
kinglet, red crowned			1			
kinglet, golden crowned						12
Louisiana waterthrush			1			
wild turkey		1				
scarlet tanager						
summer tanager						
ruby throated hummingbird						

KEY

H- heard but not seen

Total species observed

2017 Data

Bird/Date	17-Feb	17-Mar	21-Apr	19-May	16-Jun	20-Oct
bald eagle	2	2	2	2		1h
red shouldered hawk	2					1h
Osprey						
red tailed hawk	1					
Goshawk						
Cooper's Hawk		1				
Sharp Shinned Hawk						
Northern Harrier						
Merlin						
peregrine falcon						
kestrel		2				1
Turkey Vulture	10			1		2
Black vulture						1
Great Horned Owl						
barred owl			1	1		
fish crow						2
American crow	200	1				1
starlings		12		5		0
Redwing Blackbird		2	2	5	2	2
rusty blackbird						2
common grackles						
meadowlark						6
cardinal	5	2		1	3	1
blue jay	2					8
American Robin		8		2		
mockingbird	1	2			1	1
yellow billed cuckoo						
brown thrasher		1				
Carolina chickadee	4	4				
nuthatch, white breasted	4	3				
tufted titmouse	6			1		
white throated sparrow	4	14				2h
white crowned sparrow						
song sparrow	1					6
savannah sparrow						
baird's sparrow						
tree sparrow						
sparrow, field	1					
Lincoln's sparrow						
grasshopper sparrow						
chipping sparrow					2h	
Eastern towhee	2	8	2	1	2h	2h
house sparrow						
eastern bluebird	1			2	1	6
blue grosbeak					2	
rose breasted grosbeak						

2017 Data

Bird/Date	17-Feb	17-Mar	21-Apr	19-May	16-Jun	20-Oct
Tundra swan						
American coot						
duck, farm		1				
Ring necked duck	1					
mallard	12	12				
black duck		2				
northern shoveler		8				
Canada goose				6		
snow geese						
gadwall	2					
lesser scaup						
buffelhead						
red headed duck						
Wood duck				2	1	
Ruddy Duck						
Long tailed duck						
Pintail						
American Widgeon	6					
Green Winged Teal	10	6				
cormorant, double crested						
piebilled grebe						
horned grebe						
red necked grebe						
eared grebe						
ring billed gull						
herring gull						
great blue heron						
green backed heron						
blue winged teal						
Greater Yellowlegs						
Lesser Yellowlegs						
killdeer						
solitary sandpiper						
sandpipers						
Spotted Sandpiper						
Least Sandpiper						
Semipalmated Sandpiper						
Semipalmated Plover						
doves	15			2		
pigeons	50					
Carolina Wren						1h
house wren						
Brown Creeper						
Downy woodpecker	3					
hairy woodpecker						
Northern Flicker	1	1				2

2017 Data

Bird/Date	17-Feb	17-Mar	21-Apr	19-May	16-Jun	20-Oct
red bellied woodpecker	1	2		1		1h
pilliated woodpecker		1				
red headed woodpecker	2					
palm warbler						
black throated blue warbler						
black and white warbler						
yellow rumped warbler						4
magnolia warbler						
Northern parula						
redstart						
common yellowthroat				3		
barn swallow						6
tree swallow			8		6	2
rough winged swallow						
chimney swift						
orchard oriole						
Baltimore oriole				1	4	
indigo bunting				1h		
cedar waxwing						
eastern phoebe		6		1		6
acadian flycatcher						
flycatcher spp.						
kingbird						
glue-gray gnatcatcher			2		1	
goldfinch					1	2
house finch						
purple finch						
Red-eyed Vireo						
Vireo, blue headed						
white eyed vireo						
kinglet, red crowned						
kinglet, golden crowned						
Louisiana waterthrush						
wild turkey		10	1			
scarlet tanager						
summer tanager						
ruby throated hummingbird						
eastern wood peewee				1		

KEY

H- heard but not seen

Total species observed

27

2018 Data

Bird/Date	20-Apr	15-Jun	17-Aug	21-Sep
bald eagle	3	3		
red shouldered hawk				
Osprey				
red tailed hawk				
Goshawk				
Cooper's Hawk				2
Sharp Shinned Hawk				
Northern Harrier			2	
Merlin				
peregrine falcon				1
kestrel	1		4	3
Turkey Vulture	3	4		
Black vulture	2			
Great Horned Owl				
barred owl				
fish crow			1	
American crow	2	4	1	
starlings, European	15	2	15	
Redwing Blackbird	10	4		
rusty blackbird				
common grackles				
meadowlark		3		
cardinal		1		
blue jay				
American Robin	8	2		
mockingbird			1	1
yellow billed cuckoo				
brown thrasher				
Carolina chickadee				
nuthatch, white breasted				
tufted titmouse		1		
white throated sparrow				
white crowned sparrow				
song sparrow				
savannah sparrow				
baird's sparrow				
tree sparrow				
sparrow, field				
Lincoln's sparrow				
grasshopper sparrow			1	
chipping sparrow				
Eastern towhee	1h			
house sparrow				
eastern bluebird	3	2	1	
blue grosbeak				
rose breasted grosbeak				

2018 Data

Bird/Date	20-Apr	15-Jun	17-Aug	21-Sep
Tundra swan				
American coot				
duck, farm				
Ring necked duck	4			
mallard	2	1	5	
black duck				
northern shoveler				
Canada goose				
snow geese				
gadwall				
lesser scaup				
buffelhead	5			
red headed duck	4			
Wood duck	4		16	
Ruddy Duck				
Long tailed duck				
Pintail				
American Widgeon				
Green Winged Teal				
cormorant, double crested				
piebilled grebe				
horned grebe	1			
red necked grebe				
eared grebe				
ring billed gull				
herring gull				
great blue heron				
green backed heron				
blue winged teal	4			
Greater Yellowlegs				
Lesser Yellowlegs				
killdeer				
solitary sandpiper				
sandpipers				
Spotted Sandpiper				
Least Sandpiper				
Semipalmated Sandpiper				
Pectoral Sandpiper			2	
Semipalmated Plover				
doves	4	6	12	30
pigeons	20			
Carolina Wren				
house wren				
Brown Creeper				
Downy woodpecker				
hairy woodpecker				

2018 Data

Bird/Date	20-Apr	15-Jun	17-Aug	21-Sep
Northern Flicker				
red bellied woodpecker				
pilliated woodpecker	1			
red headed woodpecker				
palm warbler	2			
black throated blue warbler				
black and white warbler				
yellow rumped warbler	1			
magnolia warbler				
Northern parula				
redstart				
common yellowthroat				
barn swallow	5	2	5	
tree swallow	11	10		
rough winged swallow	2			
chimney swift	8			
orchard oriole				
Baltimore oriole				
indigo bunting			4	
cedar waxwing			1	
eastern phoebe	1h	2		
acadian flycatcher				
flycatcher, great crested		2		
flycatcher spp.				
kingbird		2		
glue-gray gnatcatcher	1			
goldfinch			3	
house finch				
purple finch				
Red-eyed Vireo				
Vireo, blue headed				
white eyed vireo				
kinglet, red crowned				
kinglet, golden crowned				
Louisiana waterthrush				
wild turkey				8
scarlet tanager				
summer tanager				
ruby throated hummingbird			1	
eastern wood peewee				

KEY

H- heard but not seen

Total species observed

From: Kiki Theodoropoulos <[REDACTED]>
Sent: Saturday, December 19, 2020 11:52 AM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Cc: [REDACTED]; [REDACTED]
Subject: [Non-DoD Source] Comments on Draft EIS Proposed BEP Facility at Beltsville, Maryland

Thank you for the opportunity to comment on the Bureau of Engraving and Printing's (BEP) draft environmental impact statement (DEIS) for a new currency production facility at the Henry A. Wallace Beltsville Agricultural Research Center (BARC). Am providing comments covering three areas:

Lack of Transparency of Site Selection Discussion

The DEIS lacks transparency in how BARC was selected as the preferred alternative. While the DEIS is responsive to EPA scoping comments (see January 2020 BEP Scoping Report) to include a list of sites examined for the facility relocation, there is no explanation as to why 100 acres was the deciding criterion for BARC. Numerous comments cited in BEP's January 2020 Scoping Report requested information on how BEP concluded that BARC was the best alternative. According to the DEIS, Treasury evaluated 81 potential sites against its minimum criteria for siting such a facility; criteria included parcel size (i.e., 60 acres or more) and location (i.e., within a 30-mile radius of central Washington, DC, and within 10 miles of a major interstate). Treasury eliminated from consideration the 25 privately owned sites and focused on the six federally owned sites. However, there is no explanation in the DEIS or in any analysis linked to the DEIS as to how Treasury changed its parcel size criterion from 60 to 100 acres. Two of the six sites were on parcels of at least 80 acres. In addition, the Biological Resources discussion in the DEIS states that 21.9 acres of the site will not be used in the operational footprint or construction limit of disturbance, further raising a question as to why the additional 20 acres were critical to site selection.

Hoping that I would possibly find an explanation relevant to the change in criteria in the September 2015 siting study (GSA, *Federal Agency Initial Site Investigation and Screening*), which is cited in the 2018 Government Accountability Office (GAO) report (GAO, *Bureau of Engraving and Printing: Options for and Costs of a Future Currency Production Facility*, GAO-18-338, May 2018) mentioned in the DEIS and in the DEIS itself, I sent an email to BEP to try and acquire the study, because it is not available in the DEIS. Not receiving a reply from BEP, I contacted GAO and was told that BEP had marked the study "Agency Sensitive." Although the 2015 siting study is cited in the references in BEP's January 2020 Final Scoping Report, a link to it is not provided, although links to other studies are earlier in the report. Instead, the Project Background moves directly from a discussion of the six federally owned properties, including BARC, identified through the site screening process to a discussion of the 2018 Farm Bill authorizing and directing an interagency land transfer of a portion of BARC from the USDA to the Treasury.

Moreover, no final siting study is mentioned in either the Final Scoping Report or the DEIS that discusses an analysis of alternatives of the six federally owned sites on which Treasury focused. All we are left with is the thin discussion in the DEIS, which appears to reject most of the sites for being on parcels of less than 100 acres. This is hardly an analysis of alternatives that follows best practices (See GAO, *DOE AND NNSA Project Management: Analysis of Alternatives Could Be Improved by Incorporating Best Practices*, GAO-15-37, Dec. 2014). For example, there is no mention in the DEIS of an entity independent of the analysis of alternatives process reviewing the extent to which all best practices have been followed. Surely if BEP had engaged an independent entity to review its analysis of alternatives, the review would have been cited in the DEIS as the 2018 GAO review (GAO-18-338), which concurred with BEP's decision that new construction was the best, most cost-effective solution, was cited. The lack of transparency concerning the selection of BARC as the preferred alternative in any of the documents that BEP has made available to the public for comment is concerning and not consistent with the spirit of a public comment process.

Shortcomings in the Air Quality Discussion

The DEIS does not include in the Air Quality discussion the potential adverse impact on air quality of the vehicles that will drive to and from the proposed facility during construction and later during operation, although it acknowledges that vehicular traffic will significantly impact the region of influence. The DEIS includes further analysis of the potential impact of the construction and operation of the proposed facility on air quality in an attached technical memorandum. The technical memorandum describes the existing air quality in the proposed facility's region of influence as well as measures to reduce potential adverse air quality effects from such construction and operation. Another technical memorandum describes traffic and transportation in the region of influence, potential traffic and transportation impacts that could result from the proposed facility, and measures to reduce potential adverse traffic and transportation effects. Treasury assumes there would be 7,278 dump truck trips over the entirety of the construction period. Although these trips would be distributed throughout the construction phase, they would primarily occur during the first 2 years of construction, when the dump trucks would be disposing of demolition materials and delivering construction materials. The technical memorandum states that while construction traffic would likely contribute slightly to traffic volume and congestion on local roadways, it would be temporary, minor compared to existing daily traffic, and would not lead to a lasting or permanent degradation of traffic operations. However, there is no discussion of how 7,278 dump truck trips would contribute to the degradation of local air quality during construction.

Moreover, the DEIS states that the proposed facility would operate 24 hours a day. Because of the decreased accessibility of the proposed facility to public transit compared to the BEP DC facility, there would be an increase in the number of employees driving. According to the DEIS, this increase in traffic from commuters and trucks (e.g., deliveries) would have significant adverse impacts on traffic in the local region of influence in 2029 (i.e., when the proposed facility becomes operational). According to the analysis in the traffic and transportation technical memorandum, of the 1,427 employees at the proposed facility, 1,138 would work during the day shift (i.e., 6:30 a.m. to 3:00 p.m.). The remainder would be almost equally dispersed over the evening and midnight shifts. The memorandum estimates that 88 percent of day shift employees would drive to work, and while not discussed, presumably, 100 percent of evening and midnight shift employees. In addition, the technical memorandum states that approximately 82 trucks (i.e., 27 box trucks and 55 semi-trucks) would arrive at and depart from the proposed facility weekly for shipments and deliveries.

While the DEIS discusses the adverse impact on roadways due to an increase in traffic from commuters and trucks, including long queues and failures at most of the 15 intersections studied in the region of influence, there is no discussion of how the increase in traffic may affect air quality from additional car and truck exhaust. Given that Treasury plans the temporary closure of some roadways (e.g., Powder Mill Rd.), where presumably traffic would idle at least some of the time, further increasing the production of car and truck exhaust, some analysis linking the effects of traffic and transportation to potential adverse impacts seems warranted.

Omissions in Biological Resources Discussion on Bald Eagles

The DEIS states that there is “one special status species, the bald eagle, is not subject to further analysis as no suitable habitat for this species is present within the region of influence.” In addition, the biological resources technical memorandum states that the closest bald eagle’s nest is located approximately 0.6 mile to the south of the project site. The eagles have resided there for about 15 years. While bald and golden eagles (and their nests) are no longer federally listed as endangered (since 2007) or listed by the state of Maryland (since 2010), they are protected under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act (Eagle Act). Both laws prohibit “take” and possession of eagles, their parts, nests, and eggs. Both acts prohibit intentional injury, harassment, and death. Under the Eagle Act, “take” also includes disturbance and unintentional (incidental) take. According to the U.S. Fish and Wildlife Service (FWS), disturbance includes immediate impacts, such as loud noises around the nest that may cause eagles to abandon their eggs or young chicks. Disturbance may also happen if humans change the landscape around the eagle nest.

According to FWS, bald eagles stay on their territory (roughly 1 to 6 square miles) year-round. Therefore, the proposed facility is part of the eagles’ foraging area. However, BEP did not do additional analysis and excluded eagles from its discussion of biological resources even though the construction of the proposed facility would likely disrupt their foraging area. For example, the filling in of wetlands on the proposed project site, the diversion or fill of two streams, and the removal of 3.6 acres of forest would presumably affect the eagles’ foraging area. The May 2007 FWS *National Bald Eagle Management Guidelines* state that disruption, destruction, or obstruction of roosting and foraging areas can negatively affect bald eagles. Disruptive activities in or near eagle foraging areas can interfere with feeding, reducing chances of survival. The FWS guidelines state that during the breeding season, bald eagles are sensitive to a variety of human activities. The FWS guidelines provide recommendations to mitigate activities that have temporary impacts, such as the use of loud machinery, fireworks displays, or summer boating activities, recommending seasonal restrictions. These types of activities can generally be carried out outside of the breeding season without causing disturbance. If there is construction of a 1 or 2 story building, with project footprint of more than half an acre closer than 1 mile from an eagle’s nest and can be seen from the nest, as in the case of the proposed facility, the FWS guidelines recommend the installation of landscape buffers.

BEP has an opportunity to include in the Final EIS at least some discussion of the effects of its planned actions on the foraging areas of eagles nesting within 0.6 mile of the proposed facility. More importantly, BEP still has time to make some modifications in its plans that may help mitigate the potential adverse impacts of construction on the existence of the eagles consistent with FWS guidance.

Kiki Theodoropoulos
[REDACTED]

From: noreply@dma.mil <noreply@dma.mil>

Sent: Saturday, December 19, 2020 6:12 PM

To: BEP-EIS <BEP-EIS@usace.army.mil>

Subject: BEP web page comments

Name clara kuehn

Email Address [REDACTED]

Thank you for the opportunity to comment on the Draft environmental impact statement (DEIS). I am a long-time resident of [REDACTED].

I am very much concerned with the potential siting of an industrial facility on the Beltsville Agricultural Research Center (BARC). In this regard, the Parks and Open Space Element of the Federal Elements of the National Capital Planning Commission (NCPC) Comprehensive Plan for the National Capital includes BARC as part of the National Capital Region park and open space system. (Federal Elements, Parks and Open Space Elements at 3-4.) BARC is specifically identified as an example of a campus that “functions as a natural habitat area.” (Id. at 3.) The Federal Environmental Elements state that the federal government should “[d]iscourage development or significant alteration of areas used by wildlife, including migratory wildlife.” (Federal Elements, FE.H.2).

Land Use and Zoning

The Federal Elements include specific directives to agencies to “preserve and maintain ... open space on federal campuses that support wildlife habitat” (Federal Elements, POS.B.6) and “[c]onserve portions of federal campuses ... that add significantly to the open space system” (Federal Elements, POS.D.11). Not only is the BARC parcel in question recognized as part of the open space system by the NCPC, it is currently zoned “reserved-open-space.”

The claim in the DEIS that the siting of an industrial facility on this property would have “less than significant” or “no negligible impact” on land use and zoning can only be understood as willful blindness. An industrial facility is patently incompatible with reserved-open-space zoning and with open space supporting wildlife habitat. The construction and operation of such a facility subverts regional land use policies (as evidenced by the suggested “mitigation” of obtaining a zoning reclassification to “industrial”) and can only encourage similar uses leading inexorably to degradation of the remaining open space on the BARC campus -- contrary to federal policy directing agencies to preserve and maintain these spaces.

Although the DEIS specifically acknowledges that BARC “is included in Prince George’s County Priority Preservation Area and the NCPC’s regional parks and open space network” and “[c]onverting Treasury’s proposed parcel to industrial land use would conflict with these local policies and associated planning goals,” it dismisses these concerns by myopically focusing on counting agricultural acreage. The invocation of “mixed” land uses west of Edmonston Road is singularly unhelpful as those properties are not part of BARC, are not part the open space network, and are not subject to reserved open space zoning.

Submit your Comments

Wetlands

The DEIS asserts that wetlands impacts are “less than significant” because it would comply with certain permitting requirements. However, the DEIS also states that the Treasury would seek an exemption from mitigation requirements under Maryland’s nontidal wetlands protection program because it would impact only 0.94 acres of the approximately 3 acres of on site wetlands. But the Federal Environmental Elements of NCPC’s Comprehensive Plan for the National Capital Region strongly suggests that federal agencies hold themselves to a higher standard. Specifically, with regard to wetlands, Federal Elements FE.E.1 states that the federal government should:

Protect the physical and ecological functions of wetlands and riparian areas with priority in the following order:

1. Avoid development of areas that contain wetlands, including isolated wetlands, or on sites that will impact the quality and health of nearby wetlands.
2. Minimize the impacts to wetlands by reducing the area of disturbances. If construction in a wetland is necessary, utilize the highest standard in project development requirements to minimize adverse impacts.
3. Replace wetlands that are lost or degraded as a result of site development.

How can it be that adverse impacts on one-third of a parcel’s wetlands that arise from a federal agency’s willful failure to meet these higher standards can still be deemed “less than significant” adverse impacts?

Surface Water

The DEIS states that the 120,000 gallons per day of wastewater produced by the operation of the proposed industrial facility would be treated at BARC’s east wastewater treatment plant (WWTP). It goes on to state that the WWTP has sufficient permitted capacity, and, consequently, there would be less than significant adverse impacts to the receiving surface waters, including Beaverdam Creek. The DEIS does not detail the existing permitted capacity or any restrictions in the permit on the contents of wastewater flowing into the plant from a new industrial user. It seems unlikely that an NPDES permit for a WWTP would allow the treatment plant to accept a new industrial user without some constraints on the materials in the new industrial user’s waste stream. (See Permit No. 15-DP-2525 (NPDES MD0020842) section II.14). The lack of discussion of the WWTP existing permit and the waste stream from the new industrial facility makes the conclusion of “less than significant impacts” a bald assertion, rather than the result of a reasoned analysis.

Lack of Alternatives

The DEIS presents only a binary choice -- build on BARC or don't build at all. This presentation enhances Treasury's "need" for the facility over the environmental impacts associated with Treasury's decision to construct and operate the facility on BARC. It puts a thumb on the scale, devaluing the negative impacts that flow from Treasury's already-determined-decision to build at this particular location rather than any other site. The DEIS attempts to correct for this failure to meet its obligation to present a suite of alternatives by describing a "screening analysis". But describing a decision that has already been taken does not allow for public input on the decision. Rather than an opportunity for public comment, this kind of back-filling presents an epic agency rationalization. That this is a rationalization, rather than an analysis, is shown by the unexplained changes to the criteria for site selection (for example, initially requiring a 60-acre site, and later requiring a 100-acre site).

Clara Kuehn

[Redacted]

[Redacted]

From: philip aronson <[REDACTED]>
Sent: Sunday, December 20, 2020 10:13 AM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: [Non-DoD Source] Comment On BARC DEIS

The impact of additional traffic on already heavily congested local roads is a major concern. The DEIS studies 15 intersections identified in the local region of influence (ROI) and finds that several of them will have failing levels of service (LOS). Other intersections in the study area will have failing and increased queue lengths. It neglects, however, to consider the likely impacts on other nearby roadways. Roads such as MD 193, US Route 1, and Kenilworth Avenue have not been adequately studied. These roads are already highly congested and will be used by employees living in nearby neighborhoods to reach the project site. The local ROI should be extended west to US Route 1 and south to MD 193 to capture the signalized intersections along these routes for analysis. The most recent traffic data from the Metropolitan Washington Council of Governments should be utilized. Also, the proposed site is not directly accessible by public transportation.

The College Park area has three streams that will be impacted by the project: Indian Creek, Little Paint Branch and Paint Branch. As many neighborhoods in the City lie within the 100-year floodplain, the increases in impervious surface from the project and changes to groundwater and hydrology, elevate the risk for increased flooding. The BARC is home to several watersheds including the Indian Creek and Upper Beaverdam Creek. The DEIS states that there will be permanent fill of 0.94 acres of wetlands and 0.65 acres of wetland buffer, as well as the potential for increased storm water volume and runoff, sedimentation, and soil contamination. The potential impacts to these watersheds need to be considered in detail to show the impacts on local streams. Additional floodplain modeling for this watershed must be done at this time to understand the full impacts and offer mitigation strategies. It cannot wait until later in the design phase. I am also concerned that local water quality will be negatively affected.

The area around the proposed site is a prime nesting spot for certain bird species, and BARC has been studying some of these for many decades. The loss of undeveloped land with the construction of one million square feet of new development will have a negative impact on these bird species. Further study is needed to evaluate these impacts and to recommend minimization practices that can be implemented.

The DEIS is not clear about the energy sources to be used in the facility. The use of solar and geothermal should be prioritized. The DEIS should also include information on waste produced and how this waste will be managed at the facility. It should describe options for recycling, and specific processes to ensure that hazardous waste is kept separate from normal waste with appropriate safeguards in place for disposal, monitoring and tracking.

Also, the DEIS needs to include the water and sewer requirements for the facility and the impact on the existing system. It should include information on any special systems required to handle the by-products of the printing and engraving process to ensure that chemicals or other toxic by-products are not entering the sewer system.

In general, more information is needed on the overall environmental impact of the 24-hour operation of the proposed facility, especially regarding lighting and heavy truck requirements. A minimum of LEED Silver certification of the facility is imperative.

Finally, I live within walking distance of BARC and I am concerned about the potential negative impact on BARC as an institution given its stature as a premier agricultural research facility with paramount importance to our country and farm economy. The research done at BARC has been, and is why, the United States is a leader in food production and agricultural innovations.

Sincerely,
Philip S. Aronson
[REDACTED]

From: Sara Alpay <[REDACTED]>
Sent: Sunday, December 20, 2020 10:49 PM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: [Non-DoD Source] Comment on Proposed BEP-EIS

To Whom It May Concern:

I am writing to express my opposition to the proposed Bureau of Engraving and Printing (BEP) plan to move its industrial and production operations from D.C. to the Beltsville Agricultural Research Center which borders the town of Greenbelt, MD. The industrial money-making factory will have many detrimental effects on our community and environment. The environmental impact statement done by the U.S. Army Core of Engineers states very clearly that there is the potential for "significant adverse effects" particularly in terms of our water resources, traffic, noise and light pollution. Please reconsider these plans as it will at best diminish the quality of life here and at worst result in serious environmental degradation as well potential health risks for both people and wildlife from polluted waste water and other toxic substances.

Sara Alpay

From: Vickie Fang <[REDACTED]>

Sent: Sunday, December 20, 2020 11:43 PM

To: BEP-EIS <BEP-EIS@usace.army.mil>

Subject: [Non-DoD Source] My objection to the Proposed construction and operation of US mint on USDA land in Greenbelt

The site for the proposed mint is the home of several bald eagles, which are protected from disturbance by the Migratory Bird Act of 1918 <https://www.fws.gov/laws/lawsdigest/migtrea.html> and The Eagle Act, <https://www.fws.gov/midwest/eagle/history/protectations.html#bgepa>. Both of these laws forbid activities that would impair the birds' "ability to forage, nest, roost, breed or raise young."

The Environmental Impact Statement addresses the issue of protecting the eagles in the following manner:

Construction: Less-than-significant adverse impact on forest resources and vegetation from the conversion of vegetated land to developed land; less-than-significant adverse impacts on wildlife from habitat loss and displacement; "may affect" determination for the federally threatened NLEB; no effect on any other federal- or state- listed special status species; less-than-significant adverse impact on migratory birds.

Operation: Negligible adverse impacts to vegetation; less- than-significant adverse impacts on wildlife from changes in ambient noise and light levels; no effect on federal- or state-listed special status species; less-than-significant adverse impact on migratory birds from an increase in ambient noise and light levels and the potential for window strikes. (E-5)

No further explanation is given as to how the eagles will be protected from the construction and operation of a large industrial plant that operates 24 hours a day, when address the issues outlined in the National Eagle Management Guideline. <https://www.fws.gov/northeast/ecologicalservices/eaglenationalguide.html> should be addressed to ensure the safety of the protected birds who nest on the property. Specifically, the statement is deficient in the following ways:

I. The area for the proposed construction is an open field will no visual barriers between the nests and the proposed factory. Nothing has been proposed to block the sight of the plant and its construction from the bird's view, despite the fact that the sight of the human activity is one of the key ways in which the eagles' ability to nest, breed, and raise young is disturbed.

Two factors most influence an eagle's response to human activity:

1. The activity's visibility from the eagle nest and;
2. The regular occurrence of similar activities near the nest. (National Eagle Management Guidelines, USFWS)

Bald eagles fear humans at all times, but will tolerate much less disturbance during the nesting season, than at other times of the year. A nesting pair will seek isolation, and any human interference, if prolonged, may drive the birds away from the nest. (Eagle Nature Foundation) http://eaglenature.com/eagle_facts.php

The proposed industrial plant would not only impose the sights (and sounds) of human activity on the birds, it would do so 24 per hours a day, every day.

II. There is nothing in the EIS which allows for the cessation of activities during periods of particular sensitivity for the eagles. Particular care must be taken during certain phases of the eagles' life as outlined by the US Fish & Wildlife Service. <https://www.fws.gov/midwest/eagle/Nhistory/NestChron.html#nesting>

III. Fish is the primary food of bald eagles. <https://www.nationaleaglecenter.org/eagle-diet-feeding/> There is only the statement that the runoff of heavy metals, including nickel and arsenic, into the creek will be adequately treated, but the issue of whether these heavy metals will affect the marine life on which the eagles prey has not been addressed.

Vickie Fang



From: Vickie Fang <[REDACTED]>
Sent: Monday, December 21, 2020 9:23 PM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: [Non-DoD Source] Comments on Draft Environmental Impact Statement

We are very concerned about the the November 2020 Draft Environmental Impact Statement for two reasons. The first is that the important topics of wildlife protection, stormwater runoff, and wetland replacement are addressed through the use of conclusory statements without transparency as to how those conclusions were reached. Our second concern is that at least three important issues were not addressed at all: 1) whether mounds of dirt at the staging areas will be kept adequately covered in case there is a major storm; 2) whether there will be a paleontologist on site to review the dinosaur bones that will almost certain be uncovered, and 3) whether there will be any sort of review of and protection for the anadromous stream that runs through the site.

Lack of Transparency

I. How protected and endangered species and species of concern will be accommodated.

E-10 states as follows:

the US Army Corps of Engineers, Baltimore District

219 (USACE) is acting as the federal contracting agency and is conducting site-specific studies to ensure

220 compliance with other environmental laws, including Sections 401 and 404 of the federal Clean Water Act,

221 Section 7 of the federal Endangered Species Act, and the Maryland Forest Conservation Act.

However, the actual effects of the construction appear to have been studied on only a single species of bat. As other comments have explained, the bald eagles nesting at the site are protected by law, and we can find nothing in this report which addresses the many harmful effects that this construction is likely to have on the birds.

The report further states:

210. Migratory birds use BARC, including the Project Site, as seasonal feeding ground, breeding ground, or for

1958 temporary stop-over during migration (USFWS, 2020a). The USFWS identifies 12 migratory birds with the

1959 potential to occur on the Project Site; these birds are also designated as [Birds of Conservation Concern](#)

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1960 (BCCs¹⁸) (USFWS, 2020b). All 12 migratory birds have been observed on BARC, although only eight have

1961 been specifically reported within the ROI (Cornell Lab of Ornithology, 2020).

We can find nothing on how the construction will affect these migrating birds or even what those birds are. Furthermore, we are only told the Army Corp of Engineers is conducting studies. We do not have information as to the credentials of the ornithologists conducting the studies. In order to satisfy the requirements of an impact statement, we must have the name of the person or group performing the study and the actual data produced by those studies.

II. Stormwater Runoff

If possible, the sections pertaining to stormwater runoff are even less informative than the sections on protected species. Although the report is littered with references to “best management practices,” obtaining permits (or getting exemptions from them), as well as the optimistic goal of obtaining “a silver LEED rating,” there is almost no explanation as to how the conclusion of “no impact to geography, topography, or soils” and “no impact to water resources” has been reached. In order to be transparent as to how the tons of stormwater that will have been polluted by this construction will be managed, this report needs to include the following: specific information on the filtration system to be used, data on sedimentation, and data on accumulation rates.

III. Replacement of Wetland

It appears from the report that the existing plan is to replace lost wetland on a one to one basis; however, in order to balance the pollution caused by the construction, the site will require additional wetland. The simple listing of acreage bypasses the key point that the land must continue to function as a wetland in the same way it did before. For this report to be transparent and complete, we need an analysis of how the site currently serves the larger environment and what must be done for it to continue to do so once a large industrial plant is constructed there. This information should identify who is doing the analysis and what data the analysis generated.

Issues not Addressed

I. Soil runoff from staging areas.

The report states that staging areas will be located at least 100 feet from surface water (p. 2-7). However, it does not state that the large piles of soil at those areas will be secured in anyway. Given that we now live in a world of increasing rainfall and increasingly intense storms (<https://www.gfdl.noaa.gov/global-warming-and-hurricanes/>), it is incumbent upon the agency to secure large mounds of soil and anything else that could be harmful to the surface water in the event of a major storm. This report lacks an explanation of how soil runoff from staging areas will be secured in the event of a major storm.

II. Paleontological Concerns

The proposed site for the mint is also a recognized site of significant dinosaur fossil discovery. No provision has been made for what will be done when construction unearths dinosaur or other fossils. This report lacks the name of a paleontologist who will be on site for the dig, and it lacks an explanation for how fossils will be handled.

III. Anadromous Stream Analysis

Herrings have been sighted in waters on the site, making the creeks anadromous streams. This report lacks any analysis of how these anadromous streams will be protected.

Because of its natural beauty, and its environmental and historical significance, this site is very important to us. Butch and Beth Norden live within walking distance of the land and have been hiking it and driving through it for decades with their children and, now that the children are grown, by themselves. They are helping to raise a grandchild who lives near them in Greenbelt and hope to take him to see its bald eagles and many other natural beauties. Together with Vickie Fang, who lives nearby in Prince George's County, they take a keen interest in any development on this land.

Sincerely,

Butch Norden (aquatic biologist retired from MDNR) [REDACTED]
Beth Norden, Ph.D., (entomologist retired from The Smithsonian) [REDACTED]
Vickie Fang, J. D. (retired trial lawyer) [REDACTED]

From: Suzette Agans <[REDACTED]>
Sent: Monday, December 21, 2020 9:01 AM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: [Non-DoD Source] BEP Site

To Whom it May Concern,

The proposed site for the BEP Facility in Beltsville, MD may be an underutilized federal site, it is however a site that needs careful consideration. These considerations include, traffic, fish and wildlife, water and human impacts. If building this facility is to occur, then standards should be higher than enforced by law or regulation to ensure impacts are reduced to practically null. I am sure many others including the City of Greenbelt will be sharing with you the negative impacts of the proposed build. There are benefits to building it at the proposed site, but the designers and builders of this facility should ensure the benefits outweigh the negative impacts. To calculate the cost of building it and maintaining the site, ecosystem services costs need to be included in the costs and the current report updated to reflect the newer accurate costs and shared with the public.

Sincerely,

Suzette Agans
[REDACTED]

Jeff Shenot



December 21, 2020

US Army Corps of Engineers, Baltimore District Planning Division
2 Hopkins Plaza, 10th Floor
Baltimore, MD 21201

Re: Comments on Treasury's BEP Project DEIS

Thank you for the opportunity to participate in the NEPA process and comment on your Draft EIS. I hope the US Department of the Treasury (Treasury) will either select the No Action Alternative based on public input, or issue a Supplemental EIS based on public input. The Draft EIS in its current state is an extraordinarily bad example of an adequate NEPA analysis, and is lacking data that would support the conclusions made in the document.

I have been a government regulatory wildlife biologist and regulatory specialist most of my career (over 30 years), but I am submitting these comments on my own behalf and the comments do are not reflective of any agency I have worked at. I have prepared over 100 NEPA documents as either the writing team lead, agency rep (for documents prepared by a contractor), or agency senior resource specialist. I have also reviewed and edited 100s of NEPA documents as a regulatory reviewer for agency clearance. I can say based on extensive experience that this document is one of the worst I've ever seen based on the paucity of data used to support its conclusions.

The DEIS has substantially inadequate descriptions of affected resources, and analysis of the environmental consequences of the

proposed actions on those resources. This inadequacy begins with the site selection criteria and screening process used, which were developed in 2015-16. The screening criteria used are not adequately proven by the DEIS to be “reasonable”, or even required to achieve the purpose and need.

Starting with criteria #1 (location): “As the seat of the federal government and where Treasury’s current and uniquely skilled workforce resides, the NCR is a strategic and necessary location for Treasury’s operations. As such, the site must be within an approximately 30-mile radius of central Washington, DC (i.e., measured from the Washington Monument).” As all federal agencies in the NCR learned this year due to Covid, that statement is not supported based on current operating capabilities and standards for the federal government in the NCR. With only a few exceptions, nearly all of the 250,000+ federal workers in the NCR were required to telework due to Covid, and have effectively been doing so for about 8 months now.

There is no justification provided why Treasury’s new BEP would have to be within a 30-mile radius of the Washington Monument for its workforce to do their “uniquely skilled” work. By requiring a site to be within a 30-mile radius of the Washington Monument, Treasury is effectively ignoring many potential sites that could be not only more strategic but also way more cost effective. Even if Treasury insisted on staying within 30 miles, commercial real estate is at the highest vacancy level now since the 2008 great recession (the most recent data I can find available shows its down 40% from the quarterly average <https://wtop.com/business-finance/2020/10/office-leasing-in-d-c-falls-to-lowest-level-since-the-great-recession/>). Let’s be real here, Treasury should look at this from a post-Covid, 2021 perspective, not a 2015 one. There have been major changes in the NCR facilities landscape and workforce operations, and this Draft EIS

should describe and adequately evaluate this but there is not even a mention of it.

Bottom line regarding siting, there are very likely to be numerous affordable and strategic locations in the general DC region that have not been considered adequately, which flaws this NEPA document from the start. I recommend that Treasury should not use this criterion, and should develop new criteria based on current federal agency capabilities and cost-benefit factors. I also recommend the site should be within 10 miles of one of the 3 major international airports in the region (IAD, DCA and BWI).

The inadequacy of data used is most obvious in the Affected Environment and Environmental Consequences (chapter 3). This is where “the rubber hits the road” for any NEPA document, but the content quality and level of detailed information Treasury provided in this DEIS would be considered thin at best for an average EA; but this is an EIS and it is entirely inadequate for an EIS.

To start with, a glaring deficiency is section 3.1.2 Resource Areas Dismissed from Further Analysis; it identifies Socioeconomics and Environmental Justice as an issue that is not significant or was covered elsewhere. The rationale provided is bizarre, for undescribed reasons this determination is based on EO 13045 (Protection of Children): “All activities would occur on land currently owned by the USDA, which would be transferred to Treasury; children are not present at the Project Site. During both construction and operation of the Proposed Action, Project Site access would be controlled to prevent unauthorized access, including that of children; if unauthorized personnel are identified on-site, activities would cease until the situation is resolved.” It is unclear how this summary was made, but it is obvious to anyone who lives or works near the proposed BEP site that the adjacent communities’ citizens and private residences will dramatically be affected by the proposed action. Even

if you are not from around here, based on aerial imagery it appears this community may be a classic example of a community potentially in need of environmental justice evaluation.

More importantly to me, as a wildlife biologist, is the inadequate descriptions of Biological Resources and evaluation of potential impacts to them. The most egregiously inadequate descriptions in the Affected Environment are:

1) Wildlife (lines 1936-1940):

"Wildlife species in the ROI are those common to semi-rural/suburban areas in central Maryland. Wildlife habitat in the ROI includes forest, open meadows, agricultural fields, emergent wetlands, and surface water. Additionally, the Project Site contains numerous bird nest boxes that provide habitat for cavity-nesting bird species such as eastern bluebird (*Sialia sialis*) and tree swallow (*Tachycineta bicolor*). Hunting is generally restricted within the ROI due to proximity to developed lands."

2) Migratory Birds (lines 1957-1961)

"Migratory birds use BARC, including the Project Site, as seasonal feeding ground, breeding ground, or for temporary stop-over during migration (USFWS, 2020a). The USFWS identifies 12 migratory birds with the potential to occur on the Project Site; these birds are also designated as Birds of Conservation Concern (BCCs18) (USFWS, 2020b). All 12 migratory birds have been observed on BARC, although only eight have been specifically reported within the ROI (Cornell Lab of Ornithology, 2020)."

And the most inadequate analysis provided in the Environmental Effects are:

1) Wildlife (lines 2002-2014)

"During construction, wildlife would be displaced from the Project Site into adjacent areas in the ROI; wildlife within the ROI would be disturbed by both construction noise and wildlife moving from the

Project Site to adjacent areas. Less mobile species on the Project Site could be killed by construction equipment. As the Project Site does not include areas critical to wildlife movement, wildlife habitat fragmentation would be negligible. Treasury would coordinate with the owner(s) of the on-site bird nest boxes to have them relocated from the Project Site prior to construction. Relocation would occur during the non-nesting period for bluebirds and tree swallows. Overall, wildlife habitat loss associated with the Preferred Alternative would not contribute to any appreciable decline in wildlife populations in the ROI. All other potential impacts to wildlife from construction would be localized and occur on a temporary basis. As such, construction of the Preferred Alternative would result in less-than-significant adverse impacts on wildlife. The Proposed Action would not substantially reduce regionally or locally important habitat or substantially diminish a regionally or locally important plant or animal species.”

2) Migratory Birds (lines 2037-2048)

"Construction of the Proposed Action could impact migratory birds in the ROI from site disturbance, particularly if construction would occur between May and September. However, most birds would likely avoid the Project Site or relocate to nearby habitat areas on BARC, in the ROI, or regionally. Therefore, construction of the Preferred Alternative would result in less-than-significant adverse impacts on migratory birds with implementation of EPMs and RCMs identified in Section 2.2.4.

Potential impacts on migratory birds from operation of the Proposed Action would be like those described above for wildlife.

Additionally, there could be occasional migratory bird mortality resulting from window strikes; however, the proposed CPF's windows would comprise a small percentage of the overall building surface area. Bird collision deterrence options would be assessed during the building and design process using the LEED framework

and implemented as appropriate. Overall, operational activities would have less-than-significant adverse impacts on migratory birds."

There are only 4 lines of text describing affected wildlife that is present in the area of potential impact (other than T&E species, which it only identified 1 species - Long Eared Bat; I will not comment on that since it is up to US DOI and MD DNR to do that). Likewise, there are only 12 lines provided for analysis of consequences of construction and operations. This would be an adequate evaluation of potential impacts to wildlife for a typical small proposed action that would be expected in an EA (i.e., building a new bridge over a stream on Powder Mill Road). But this is an EIS, and it is grossly inadequate given the significant natural resources present in this area and the potential impacts from both construction and operations.

The Migratory Birds section misleads and misinforms readers. It says FWS identified 12 bird species (but does not identify which) with the potential to occur onsite, and says only 8 have actually been reported from the ROI. Let that sink in.... It cites FWS ' landmark report (2008 BCC) to identify birds of concern, which I assume this means the 12 referred to are listed by the report. This is misleading to the reader since the Draft EIS doesn't explain the context of that report. More importantly, I know there are close to 200 species of birds that have been documented BARC approximately in the last decade, and this information is readily available from public sources yet it is not provided in this document. I am certain the Maryland Ornithological Society and local Audubon chapters can provide Treasury with additional site-specific bird resource data upon request.

The EIS identifies 149 specimen trees that would have to be removed. This is a huge number of specimen trees for a project in the NCR! Most old individual mature trees are important habitat for wildlife and provide multiple functions ecologically. Despite the old

abandoned buildings scattered in the proposed ROI, the current land use there is a wonderful blend of habitat comprised of mature trees encompassed within an old pasture, and it's adjacent to a forest on one side and BARC crop research area on the other. Anyone who has looked for birds more than once, knows that edge habitats are the greatest areas of diversity and this particular area at BARC has one of the greatest uses by birds of anywhere on BARC. Yet the DEIS states: "As the Project Site does not include areas critical to wildlife movement, wildlife habitat fragmentation would be negligible". This is a grossly undocumented conclusory statement.

I have huge concerns regarding the long term adverse operational impacts (noise, night light, human disturbances, building collisions, etc). The potential impacts from this to biological resources are almost completely dismissed, and conclusively summarized as less than significant without any substantive evaluation. Constructing and operating an industrial facility in agricultural, field and wooded habitats will result in substantial and possibly significant habitat fragmentation. That is the purpose of doing a NEPA analysis but this document fails to do so and its conclusory determinations are unsupported.

From what I hear, operations of the proposed new BEP could adversely impact Beaverdam Creek by releasing treated sewage effluent (a permit is required but presumably could be obtained), and the volume will be increased by 60%. How is an increase of 60% less than significant? I know Beaverdam Creek is used by many species of wildlife, and there is an active Bald Eagle nest close by. Yet the DEIS has very little data or evaluation of these water resource impacts.

In summary, I urge Treasury to either:

- Prepare a Supplemental EIS with adequate resource descriptions and impact evaluations as I described, or

- Select the No Action alternative and start over the process by developing new site selection criteria, based on existing 2021 federal agency operating standards and protocols as I mentioned in my comments.

Thank you-

Jeff Shenot

From: noreply@dma.mil <noreply@dma.mil>

Sent: Monday, December 21, 2020 12:01 PM

To: BEP-EIS <BEP-EIS@usace.army.mil>

Subject: BEP web page comments

Name	Msabah Sange v
Email Address	[REDACTED]
Submit your Comments	Cultural resources

[REDACTED]

From: noreply@dma.mil <noreply@dma.mil>
Sent: Monday, December 21, 2020 12:05 PM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: BEP web page comments

Name	Jennifer Kalmanson
Email Address	[REDACTED]
Submit your Comments	<p>As someone who commutes through BARC to get to work, I am concerned that there won't be enough public transit options to accommodate the increased traffic for the repurposed facility. It's too bad that the Purple Line isn't going far north enough to accommodate planned growth. If the Green Line can't be extended through to Columbia, Ellicott City, and points north, with stops along the way for BARC, then the only other viable option would be increased bus service to the area. Without these extra transit options, this new planned use could have terrible impacts on prevailing traffic patterns.</p> <p>Thanks for taking the time to consider these impacts.</p> <p>Respectfully, Jenny Kalmanson</p>

[REDACTED]

From: noreply@dma.mil <noreply@dma.mil>
Sent: Monday, December 21, 2020 12:14 PM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: BEP web page comments

Name Lucy Carter

Email Address [REDACTED]

Submit your Comments

I have lived by the BARC "farm" for 22 years. The rural beauty is one of the reasons we bought a home here, sandwiched between the Patuxent Wildlife Refuge and the BARC fields, pastures, barns and woodlands. Relocating an engraving and printing plant onto the BARC land would ruin the area.

I am appalled the area was even considered. Why does Prince George's County have to bear any more industrialization of its rural areas? We are already fighting location of the MAGLEV project near our home and now this.

Certainly the old plant may need modernization but it can be done without destroying one of the few working farms in suburban Prince George's County. Additionally, the agricultural research going on at BARC will be even more important as we face global warming and the destruction of food-producing land and small farms.

Please leave the BARC site intact and refurbish the money-making plant where it is or find a site that won't destroy our precious rural lands.

[REDACTED]

From: noreply@dma.mil <noreply@dma.mil>
Sent: Monday, December 21, 2020 2:45 PM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: BEP web page comments

Name	Marcia Van Horn
Email Address	[REDACTED]

Submit your Comments

Dr. Lawrence Zeleny, retired BARC scientist, placed his trail's first bluebird box in 1965 right outside his office. Then every week from March to September he would faithfully examine 60 boxes along a 10 mile meandering route. Thirteen years later, in 1978, Larry founded the North American Bluebird Society, an education, conservation, and research organization whose purpose was to promote the preservation of cavity nesting species that were in decline. Now, there are thousands of members who build boxes, teach scouting groups how to build boxes and care for birds and habitat. Dr. Zeleny's nest box trail, featured in National Geographic, may well be the longest running, continuously monitored trail in the country. It's historic and it's on the BARC property. Three of us took over the trail from him shortly before his death 25 years ago. It has tripled in size, and the area of Poultry Research Road, then and now, has, by far, been the most successful site on the 7,000 acre BARC property. It is ideal bird habitat, park-like grassland, dotted with trees, ideal forest edge. Hawks, owls, deer, flying squirrels, rabbits, and songbirds thrive here. Our 20 nest boxes never have a vacancy. It is here where our personal research allowed us to determine the ideal nest box for forever hotter summers. After 24 years, in 2019, our research enabled us to create a climbing predator guard that has stopped 100% of climbing predators like raccoons and snakes without harming anything. This has never been done consistently. Poultry Research Road is a fantastic research site for us. In 2019, on this road alone, we produced 99 new bluebirds and 38 new tree swallows, a record for us. The young were well fed and continued to stay after leaving the nest because the insect population is so numerous here. In a recent study of the cavity nesting Carolina Chickadee, it was determined that 5,000 insects were consumed per clutch of hatchlings. This year, 2020, we fledged over 100 birds again in 27 nest attempts. That is a lot of insects consumed. That's because Poultry Research Road is ideal habitat for birds and insects.

A study published in 2019, in the journal Science, concluded habitat connectivity enhances diversity. Fragmentation of ecosystems leads to loss of biodiversity in the remaining habitat patches but retaining connecting corridors can reduce these losses. They concluded "restoring habitat connectivity may thus be a powerful technique for conserving biodiversity, and investment in connections can be expected to magnify conservation benefit."

There is a benefit to not breaking up BARC green space. The 2018 Agriculture Bill signed by President Trump makes EQIP, THE ENVIRONMENTAL QUALITY INITIATIVE PROGRAM a priority, including the promotion of habitat conservation. The National Resources Conservation Service has an office here at BARC on Beaver Dam Road. One of their programs is to increase wildlife habitat on farms. The land on Poultry Road is ideal for studying forest edge species, crop pollinators, and conservation bio-control buffers. This land can be utilized now and in the future for agricultural research and this can only be achieved without severely altering the current landscape.

Also, the grassland of Poultry Research Road is distinct and acts as a carbon sink. In an August 19th, 2020 article in the Washington Post, Storing Carbon in the Prairie Grass, it was stated, "as part of photosynthesis, plants pull carbon dioxide from the atmosphere and store it in their stems, leaves and roots. Unlike trees, grasslands store most of their carbon underground, in their roots and the soil. And that makes them more reliable carbon sinks than forests." And, "land that has not been tilled or overgrazed has the potential to sequester the most carbon," said Hal Collins, a microbiologist with the Agricultural Research Service of the Department of Agriculture. "One acre of pristine prairie can store about five tons of carbon," he said.

This month, five of America's largest conservation organizations called for bipartisan solutions to the crisis facing our native grasslands including passage of a new North American grasslands conservation act. This would invest in conserving and restoring our native grasslands for ranchers, wildlife, and future generations.

There has been a steep reduction of acres in the Department of Agriculture's Conservation Reserve Program (CRP), run by the USDA Farm Service Agency. Over the last 13 years this decline has negatively impacted wildlife populations and soil health. Preserving these critical landscapes can address climate change, support wildlife, and restore waterways. Presidents of the National Wildlife Federation, Pheasants Forever and Quail Forever, National Wild Turkey Federation, Congressional Sportsmen Foundation, and Theodore Roosevelt Conservation Partnership conclude restoring grasslands is the main tenet of any comprehensive climate strategy. "Grasslands enrolled in the conservation reserve program already sequester an average of 49 million tons of greenhouse gases annually (equivalent of taking 9 million cars off the road each year), while reducing flooding and erosion during extreme weather events."

Poultry Research Road is excellent, yet diminishing, grassland and forest edge habitat. The almost 7,000 acres of BARC itself is the last large open green space between Washington and Baltimore. The United Nations just declared the next 10 years as the decade of ecosystem restoration. Loss of this particular site, (especially to a building far larger than anything on the east campus), within this green space, will have an adverse effect by disrupting this forest edge and grassland conservation corridor. Rather than fundamentally changing this habitat, we should conserve and restore it for future research and for its local and planetary benefit.

Marcia and Robert Van Horn
[REDACTED]

From: noreply@dma.mil <noreply@dma.mil>
Sent: Monday, December 21, 2020 3:19 PM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: BEP web page comments

Name Joshua Carter

Email Address [REDACTED]

Submit your Comments I feel that retrofitting the existing treasury with environmentally friendly fixtures will vastly reduce the environmental cost compared to constructing an entirely new facility. The CO2 emissions required for the bricks, mortar, glass, metal, and other construction materials is vastly underestimated. In addition, having a strong agricultural research department is very important with a growing population such as the United States'. BARC has already suffered sizable land losses to the NASA Goddard facility, and losing more space will negatively impact their operations. In addition, the construction and emissions from the proposed treasury facility may negatively affect their studies, causing inaccurate data. The construction will also cause unnecessary increases to traffic in the area- the Baltimore/Washington parkway, kenilworth/Edmonston, and the beltway are already congested, and this construction will increase traffic through increased commuters and potential road shutdowns during construction.

[REDACTED]

From: noreply@dma.mil <noreply@dma.mil>
Sent: Monday, December 21, 2020 3:39 PM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: BEP web page comments

Name	Melissa Daston
Email Address	[REDACTED]
Submit your Comments	<p>Your report and attachments, though voluminous, were lacking in data, riddled with internal inconsistencies, and showed a deplorable lack of a consistent research methodology and analysis. If submitted in one of my University of Maryland classes, it would be graded as a D+.</p> <p>Specific issues:</p> <p>1) Accessibility to the DRAFT EIS was limited to the web site making it a challenge for those with no to limited computer access due to closure of libraries due to COVID-19. It was also published in English only. This issue disproportionately impacts the predominantly minority and elderly population on properties that abut or are within 1/2 mile of the proposed BEP facility. When directly challenged during the public webex regarding accessibility and a suggestion that hard copies be placed in the open Department of Agriculture library in Beltsville, there was no response.</p> <p>2) Impacts. There are significant differences between the Scoping Report and the Draft EIS on negative impacts to the community. These inconsistencies are not noted or highlighted as changes.</p> <p>3) Air Quality is a major concern. The report says that downtown DC air would improve but that is something a first grader might say. The failure to address the impact of increased emissions in an area well documented by multiple Federal agencies as suffering from high VOCs underscores the shoddy and superficial nature of your report.</p> <p>4) Traffic. Any local resident, in non-COVID time, can tell you that the roads surrounding and through the BARC are bumper to bumper Northbound, Southbound, East, and West from 5:30am until 9:30am in the mornings and from 3:30pm until 7:00 pm in the evenings. Needless to say, the 8 failing intersections you noted will most likely become 15 out of 15 failing intersections if the facility is built. While you note the failure of intersections, the lack of alternative transportation, and the need for improvements you did not state who will be responsible for these -- the Federal government or the local elderly and disadvantaged population.</p>

5) Physical facility and Zoning. The physical facility a massive 1 million square foot, 40 to 50 foot high INDUSTRIAL facility is absolutely inappropriate usage for a rural agriculturally open-space zoned area. To capriciously state that the desires of the residents of Prince George's County for this to be zoned R-O-S will be changed by waving a wand by the Federal government is arrogant and inappropriate. The days plantation masters telling elderly, poor, and minorites that this will be good for them are over. Certainly adjustments to the design including lowering the height to 1-story with offices in an underground floor would be more appropriate and less offensive.

The new Federal mandate require an minimum of an 80-foot security setback which is not met based on the houses located on Odell Road and the graphic you provided in the Draft EIS.

The design also fails to incorporate the 3-1 parking enacted under the Carter Administration for all Federally owned facilities. With a population of 1,600 workers there should be less than 550 spaces or 1/3 of what is noted to be in compliance with Federal law.

There was no mention of a visitor center, gift shop or tours to replace those currently given. I highlight of many visits to Washington DC. Will this require additional square footage and taking of more land?

6) Environmental Impacts. Building a industrial plant that includes toxic material storage and effluent in a pristine agricultural area boggles the mind. The Draft EIS consistently under estimated the number of bird species that have been documented, noted that 120,000 gallons of waste water dumped into pristine creeks and ground water will not create a future Superfund cleanup or further flooding which plagues the area. Nor was there any mention on impacts to existing well water that services this minority population. Another example of discriminatory treatment and negative social justice.

I'm sure others will give you further comments on the environmental impacts. I'll end here by stating that the choice of BARC for any industrial usage is inappropriate. Failure of the Bureau of Engraving and Printing to program the required funding to build on other than "free" Federal land is not the responsibility of the residents of Prince George's County nor is it a reason to plunk the BEP on the BARC. If the situation is as dire as stated in the Draft EIS, Congress or the Department of Treasury has the resources to find a better and more fitting location such as the former commercial site at the intersection of the Beltway and Route 202.

From: noreply@dma.mil <noreply@dma.mil>
Sent: Monday, December 21, 2020 5:14 PM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: BEP web page comments

Name

karen I have lived 3 blocks from BARC my entire life... 63 years. Having BARC as a neighbor was a wonderful experience growing up as a child. There were numerous outings learning about plants, nutrition, livestock seeing the inside of a cow, the Beltsville turkey. Too many firsts to list. BARC's Success and BARC's 1st were Beltsville's Success. My childhood friends parents were the scientists researches studying the impact of droughts, or shorter growing seasons, how to grow plants and livestock in adverse conditions. Learning to appreciate the benefit of such vast open space in an increasing urban area. Unfortunately since my 20's BARC has been under attack. I have watched politicians from both parties chip away at the CROWN JEWEL of Beltsville, Prince George's County and Maryland. Different programs have been moved to other parts of the country. This has put the remainder of BARC at risk. Every 7-10 years someone wants to move all of BARC from Beltsville. We are having this discussion because the site under consideration lost the previous Research Program was moved to another state. Leaving the land and the buildings vacant. As President of the Beltsville Citizen's Association I have worked with Congressman Hoyer to keep BARC here everytime someone has wanted to sell off all or some of BARC! I support BARC wanting to partner with the Bureau of Engraving and Printing. If the land continues to sit vacant it leaves all of BARC at risk. There have been comments about traffic....funny thing is those raising traffic as a concern are the same people who have fought Maryland 201 extended from Greenbelt to Laurel for years. The result is rush hour is now 3 hours in the morning and 3 hours in the evening with cars sit idling at the various traffic lights along Edmonston / Maryland 201. Construction Technology has also changed which will help with the emission concerns from the new facility. I want BARC to stay in Beltsville!!! If sharing some of their land with another Federal agency gives BARC stability I am in favor. If BARC is declared surplus who knows what will happen. To those who are opposed to this proposal I say " Be careful what you wish for...."
Karen Coakley Life long [REDACTED] Resident coakley

Email Address

[REDACTED]

Submit your Comments

I have lived 3 blocks from BARC my entire life... 63 years. Having BARC as a neighbor was a wonderful experience growing up as a child. There were numerous outings learning about plants, nutrition, livestock seeing the inside of a cow, the Beltsville turkey. Too many firsts to list. BARC's Success and BARC's 1st were Beltsville's Success. My childhood friends parents were the scientists researches studying the impact of droughts, or shorter growing seasons, how to grow plants and livestock in

adverse conditions. Learning to appreciate the benefit of such vast open space in an increasing urban area.

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I want BARC to stay in Beltsville!!! If sharing some of their land with another Federal agency gives BARC stability I am in favor. If BARC is declared surplus who knows what will happen. To those who are opposed to this proposal I say " Be careful what you wish for...."

Karen Coakley
Life long [REDACTED] Resident

From: [REDACTED] <[REDACTED]>

Sent: Monday, December 21, 2020 5:53 PM

To: BEP-EIS <BEP-EIS@usace.army.mil>

Subject: [Non-DoD Source] EIS BPE BARC

As a resident of [REDACTED], I would like to make the following comments regarding this project.

1: The report mentions the "proposed retainment" of the forest buffer". It was the communities understanding that this forest buffer would be kept in place. Without this buffer, the noise and light impact on our neighborhood will be greatly increased. This buffer is also home to abundant wildlife.

2: Sound: The report mentions calculations regarding how far sound from the facility will carry and impact the community. As a resident of 20 years, I would like to emphasize that average dB ratings do not apply in a normal way to this area. Sound travels extremely far and loud due to the lay of the land. We are in somewhat of an echo chamber here. Noise from the facility will likely be much more intrusive than the calculations suggest. As an example, the train noise from the tracks along route 1 can be heard very loudly in the neighborhood, especially on the second floor of our homes. If we can hear that, I assure you that overnight truck deliveries and HVAC systems will also be a constant problem. We do appreciate the discussion of removing the rumble strips. It is greatly appreciated, but overnight truck deliveries will have a larger than negligible impact on the quality of life.

3: Light: Even considering the efforts mentioned in the report to lessen the light impact on the area, it will still have a very negative impact. Light pollution is an ever increasing problem for both people and wildlife.

It is still my hope that BEP and BARC will reconsider using this location for the new facility.

Sincerely,

[REDACTED]

From: Albert Klein <[REDACTED]>
Sent: Monday, December 21, 2020 9:30 PM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: [Non-DoD Source] Comments

I would like to submit the following comments concerning the Draft of the BEP-EIS:

1. I oppose the relocation of the BEP to the BARC as this facility does not meet the current zoning for this site.
2. This site is a natural habit and sanctuary for wildlife which will significantly be impacted by a manufacturing type facility.
3. Traffic along Powder Mill Road is significant now during morning and evening rush hours and will only be increased and probably occur throughout the day and even during the night with this type of 24-hour facility operation.
4. Heavy vehicles including semis and employee traffic will have a major impact on the surface condition of Powder Mill Road.
5. The exhaust emissions from the diesel type trucks and increased employee vehicles will also have a major impact on the clean air in this and surrounding areas.
6. Minimal public transportation for the 1600 employees that will be working at this facility.
7. The treatment of the discharge to the existing drainage systems does not appear to be adequate.
8. As economies evolve it appears evident that the need for paper money will substantially decrease as has occurred during the current pandemic. The future need for this facility may not even exist.

As a [REDACTED] I believed that the surrounding area would always be maintained as a natural Greenbelt Space. I do not believe a 24-hour 365 Days a Year facility operation such as the BEP is appropriate for this proposed site.

I appreciate the opportunity to submit my comments.

Thank you, Albert Klein



Virus-free. www.avast.com

From: Ben Fischler <[REDACTED]>

Sent: Monday, December 21, 2020 10:09 PM

To: BEP-EIS <BEP-EIS@usace.army.mil>

Subject: [Non-DoD Source] Comments on Bureau of Engraving and Printing (BEP) Project DEIS

I am writing in support of the **NO ACTION ALTERNATIVE**. The proposed BARC building site is inappropriate for this project as it is part of the existing agricultural research facility. The only reason that the BARC building site is being considered is that BARC has been chronically underfunded, however the solution to this problem is to properly fund the agricultural research our nation needs. Building a 100-acre industrial facility there would preclude use of this land for agricultural research once the funding issue is resolved. Section 3.6.1.3 of the DEIS documents that “the Project Site contains approximately 59.3 acres of prime farmland and 27.2 acres of farmland of 1636 statewide importance”; we can not afford to destroy this resource.

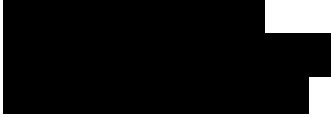
It is important to note that during the DEIS public hearing on December 2, 2020, nobody spoke in favor of the preferred alternative while many flaws in this DEIS were commented on. Since that meeting the City of Greenbelt has issued detailed comments on the DEIS, which also support the no action alternative.

The DEIS did not address the comments I submitted during the scoping public comment period. In those comments I stated my concern that the NEPA process is being drawn too narrowly for this project. Although we were told at the December 3, 2019, scoping meeting that over 100 sites have been examined, the DEIS only considered the BARC site and a no-action alternative. The DEIS does not provide information on the full set of over 100 sites examined. It is very unusual for an EIS to only consider one build alternative, as this EIS is doing. Additional alternative building sites should have been fully analyzed and evaluated in the DEIS. One alternative building site that should have been included is the location of the former Landover Mall, which is the right size for the BEP needs and is located adjacent to major highways.

The comments I submitted during the scoping public comment period also noted that concerns have been raised about wastewater disposal from this site, including questions about hazardous and toxic materials and the level of treatment of the wastewater. At the December 3, 2019, scoping meeting the answer provided was that existing clean water laws will be complied with. BEP should be committing to exceeding the minimal requirements of existing clean water laws, given the high quality of the local Beaverdam Creek watershed and its contribution to the challenged Anacostia River watershed. However, the DEIS presents plans based on the opposite commitment. The Water Resources Technical Memorandum presented in support of the DEIS states that “Beaverdam Creek has remaining assimilative capacity, which means it is able to receive additional wastewater or pollutants, in accordance with applicable TMDLs and permitting requirements, relative to current conditions while still maintaining its status as a Tier II water.” (p. 6, lines 65-68), then goes on to state that the overall condition of the Anacostia Watershed is characterized by “poor ecological conditions and degraded water quality” (p. 6, lines 77-79). So, the DEIS is proposing the illogical approach of adding increased burden to one of the healthier streams when the overall watershed is rated as “degraded.” This alone argues for the no action alternative.

During the DEIS public hearing on December 2, 2020, commenters questioned why the adjacent Vansville community was not directly informed about the EIS process and specifically that hearing. The DEIS itself defines the Vansville residences along the north side of Odell Road as an “EJ” (environmental justice) community, yet no effort was specifically directed to engaging this community in the EIS process. The review of this DEIS is incomplete without real engagement with this adjacent community.

Benjamin Fischler



From: Robert Grumbine <[REDACTED]>
Sent: Monday, December 21, 2020 11:16 PM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Cc: [REDACTED]
Subject: [Non-DoD Source] Comments on November 2020 Draft EIS

I am quite concerned about the November 2020 Draft EIS. There are two families of reason for concern.

First is the general lack of detail. Many items are dismissed by 'feasible'. ex: lines 1664-6 "These design features would retain pre-development hydrology on the Project Site to the maximum extent technically feasible and minimize water pollution, including from sedimentation (see Section 3.7)." But section 3.7 does not state what results are considered feasible. Technology can restore much -- for a price. But nothing is stated as to how much money will be committed to this restoration (or in the many other items that will be pursued to 'feasible' extents), nor the results that will be achieved/required.

The concern about lack of detail is amplified by the fact that a crucial reference link -- EISA section 438 -- is broken. There is little benefit to asserting compliance with a standard that is not made available.

The second major realm of concern is that as a frequent runner through the BARC, I appreciate just how important water is in that area, not least for the wildlife it supports, including eagles, and the generally slow drainage or episodically swampy areas through the area. Those waters are good for the insects, birds, and then the birders who come to the area.

The water management plan, especially storm water, is exceedingly vague and not in accord (at least) with EO 13508. Insofar as anything quantitative may be inferred, it is only backwards looking -- flood plains as determined by FEMA (2016), which use only past observations. But EO 13508 promotes considering climate change effects in the Chesapeake Bay watershed, which the draft EIS notes this construction is in. The draft EIS ignores impacts of changing rainfall levels (6c) and the potential impacts of more severe storms (6e), noted in EO 13508.

Even if the planned storm water and wastewater treatment plans were sufficient to avoid damage to the Chesapeake under past climate conditions, which nothing has been presented to support, there is no reason to believe that those plans will respond sufficiently to the climate that will be experienced over the life of this plant. In particular, it has long been known in the meteorological community that rainfall events are becoming more severe in MD (e.g. Karl and Knight, Bulletin of the American Meteorological Society, 1998), and the scientific support for this has only grown in the interim. See, for example, the 4th National Climate Assessment, released in 2018 by the US Global Change Research Program.

Just looking at the map, it appears (figure 3.7-3) that the proposed 'stormwater feature's are comparable in size to the wetland 2,3, and parts of 4, that will be filled (lost). Numbers should be provided to area, depth, reserve capacity. In any case, many acres (1179 capacity parking lot in addition to the building itself) of impervious surface are being introduced and little or no net new stormwater / wetland area or capacity is being introduced. It is therefore highly implausible that there will be 'no or negligible adverse impacts' as claimed (line 1848).

More than merely the water path, the contents of the water running off the newly impervious surface is not mentioned as to treatment and impact on local ecosystems down to the Chesapeake Bay. No mention is made of the ability of the stormwater treatment approach to cope with parking lot material runoff (hydrocarbons, heavy metals, plastics, ...), even for the current climate.

Regarding current climate, the EIS never defines what climate values are used -- a critical point especially for storm water. The EISA 438 is nonrestrictive as to methods at the planning tool or preliminary design stage (table 19), and no mention is made of what methods are used in the Draft EIS. As only one is considered suitable for later stage planning, it is important to know what has been done. Further, 438 is ambiguous as to how much data must or may not be used. e.g., in calculating 95th percentile rainfall event (pg 22), it mentions only a minimum of 10 years. It does not mention that no more than NN (some number) may be used. Given the changing climate, going back 70 years will give a misleading idea (too low) even of current 95th percentile rain events.

NCDC is noted (in 438) as a data source to use; they are now NCEI. Climate normals are recalculated every decade, in the X1 years, (2011, 2021, 2031, ...). Even if appropriate use was made of current climate normals in the Draft EIS, they will be obsolete before this message is read. Much less, with climate change, for the operating life of this plant.

I note that I only particularly addressed the water because that is an area I know something about professionally. Since the report is so vague and implausible in this area I do know something about, I must also be concerned about other areas that seemed unlikely to be true -- such as no impact on historical, biological, archeological, or paleontological concerns.

And a certain frustration: I have worked professionally with people who are or were in the USACE, and this report is nothing like the high quality work I am used to seeing.

Sincerely,
Robert Grumbine, Ph.D. (Geophysical Sciences)



From: Ross Geredien <[REDACTED]>
Sent: Monday, December 21, 2020 11:46 PM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: [Non-DoD Source] Bureau of Engraving and Printing (BEP) Project EIS

Colonel John T. Litz
District Engineer
U.S. Army Corps of Engineers - Baltimore District

Dear Mr. Litz,

I am writing in regards to the draft Environmental Impact Statement (EIS) for the Dept. of the Treasury, Bureau of Engraving and Printing (BEP) Replacement Currency Production Facility Project at the Beltsville Agricultural Research Center (BARC). I am a resident of [REDACTED] and a member and volunteer for the Maryland Ornithological Society. I regularly perform volunteer bird surveys on the BARC property and have become familiar with its natural resources over the past several years. It is truly a unique tract of land in the DC-Baltimore metropolitan region and even within the Northeast Corridor. The proposed action would be an inappropriate use for the site, and the draft EIS is severely deficient in many aspects so as to justify a rating of EO-3 at best.

The BARC is an under appreciated institution. It is the U.S. Dept of Agriculture's (USDA's) largest research facility and has great potential for the future as a center for globally significant research in sustainable agriculture and climate adaptation research. USDA's willingness to transfer land to the Dept of Treasury is a symptom of the lack of maintenance and investment in such research. But building a massive industrial facility creates a perverse incentive for the BARC and is contrary to the Center's mission of providing the American public "...with an exceptionally talented, highly interdisciplinary scientific community....and leverage these resources to envision, create, and improve knowledge and technologies that enhance the capacity of the nation - and the world - to provide its people with the health crops and animals; clean and renewable natural resources; sustainable agricultural systems; and agricultural commodities and products that are abundant, high-quality, and safe."

The Draft EIS failed to identify all potential federal sites that meet the proposed projects criteria. One such site that was egregiously omitted, for example, is the GSA's 229-acre parcel at 11600 Springfield Rd. in Beltsville, where the Dept of State and the Central Intelligence Agency Special Collections Service have facilities. The Dept of Defense (DOD) has numerous tracts of land in the DC metro region, some of which are over 1,000 acres. Fort Meade currently houses multiple agencies and has several large open areas on its northeast side that meet the size requirements of the proposed action. Perhaps these were dismissed early on, but the EIS must state why these sites were rejected, as they are within the study area.

The Draft EIS has no alternatives analysis and fails to meet the spirit of the requirements of EPA's NEPA regulations at 40 CFR 1508. While no explicit requirement for the number of alternatives is specified in the regulations, it is generally accepted that at least two action alternatives should be proposed. To be considered robust, an EIS should present more than one alternative besides the no-action alternative to demonstrate that adequate options were evaluated. The draft EIS provides a false binary choice in this regard. As mentioned earlier, the EIS failed to consider other federal properties in the study area. Other options besides federal land transfer could also have been evaluated, such as leasing of federal lands, or dividing up the CPF operations to multiple smaller facilities (new or existing) in the region. Another alternative that is not even mentioned would have been to retain some aspect(s) of the current facility while moving other operations to a smaller, new facility. No mention or consideration of such reasonable, practicable alternatives, and the lack of rationale provided as to why such alternatives would not meet the project need, demonstrates that the alternatives analysis is severely lacking and therefore should be reworked and republished for public comment.

Chapter 3 of the draft EIS is also severely lacking. Several other commenters, including the Maryland Ornithological Society, have commented on the abundant bird life documented at the BARC site, including the parcel(s) specifically under prospect for the CPF. This area is a savannah habitat that is quite unique in the region. The landscape on the 11000-acre BARC represent a diverse mosaic of vegetation and habitat types. The biological resource section is woefully inadequate. As mentioned, other commenters have submitted data for well over 100 bird species that have been documented on the site. This greatly contradicts the "12" species of migratory birds mentioned on line 1958 of the draft EIS. Other than citing USFWS and MD Natural Heritage Program data for listed species, there is no mention or description of any methodologies or surveys conducted to inventory the biological diversity on the site.

Compounding the inadequacy of the biological inventory is the omission of a major known proposed action in the cumulative effects analysis Section 4. That project is the MAGLEV high-speed rail, which would also run through the BARC as well as the adjacent Patuxent Refuge and would occupy a footprint of several hundred acres. The cumulative impact of these two projects together would be huge, greatly transforming the character of the BARC from one of the largest tracts of biologically diverse, undeveloped land in the region to that of an industrial zone. The draft EIS states that the action would displace wildlife and other biological resources, however, no mitigation is proposed. The EIS also says that significant impacts to EJ communities would result, and again no mitigation is proposed. There are majority African American and minority communities in nearby Greenbelt, MD that would be adversely impacted by this and by other proposed and existing projects, and these all must be taken into account when assessing proper mitigation measures.

Because of the aforementioned, along with other, environmental concerns and deficiencies of the draft EIS, I recommend that the EIS be reworked to include more alternatives, stronger cumulative effects analysis, and more inventory data and information of existing resources, and then re-distributed for public comment. The EIS as it currently is is inadequate and should result in an adequacy rating of 3 with Environmental Objections (EO) as the impact rating.

Respectfully submitted,

Ross Geredien

A black rectangular redaction box covering the signature area.

From: noreply@dma.mil <noreply@dma.mil>
Sent: Wednesday, December 23, 2020 9:18 AM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: BEP web page comments

Name	Shelby
Email Address	[REDACTED]
Submit your Comments	No facilities should be built on BARC land. It's primarily a nature preserve and that should not be altered. It's more important for that land to be preserved for nature and to maintain Maryland's environment and ecological diversity. There are so many other paces to put this building, so put it somewhere else where there is already infrastructure for a building, parking, cars driving to and from work, and hundreds of workers.

[REDACTED]

From: noreply@dma.mil <noreply@dma.mil>
Sent: Wednesday, December 23, 2020 12:44 PM
To: BEP-EIS <BEP-EIS@usace.army.mil> **Subject:**
BEP web page comments

Name	Mary Roary
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Email Address	[REDACTED]
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Submit your Comments	This is unacceptable and so unfair. I just bought my house a little over 2 years ago and I certainly didn't buy it for it to be across the street from traffic, noise, environmental pollutants, and other unforeseen issues. This is a beautiful quiet residential neighborhood not a business district. Please do not allow this to happen. Many thanks for your serious consideration.
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[REDACTED]

From: Jeanette Helfrich <[REDACTED]>
Sent: Wednesday, December 23, 2020 9:57 PM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Cc: Home <[REDACTED]>; Pat Myers <[REDACTED]>; [REDACTED]
Subject: [Non-DoD Source] Comments on BARC - move to Greenbelt from downtown DC

Thank you for the opportunity to respond to concerns involving the move of the Bureau of Engraving from downtown DC to the Beltsville Agricultural Center.

I would like to make several comments:

1. This seems generally like a logical and sensible move and I hope you continue to follow all state, local, and federal guidelines and communicate with your neighbors.
2. Please conserve the environment and do your best to promote clean water and clean air. When I worked downtown for 25 years at DOE, I often walked near your plant and I could smell the ink (not unpleasant) but I hope you will do your best to not pollute the air from your ink and paper products.
3. Please promote recreational opportunities near your new plant. Please allow as many biking and hiking trails as possible, with appropriate road crossings and traffic lights. Please upgrade roads as necessary. Commuting by bicycles is very important for your staff, and also for the neighborhoods around you.
4. This comment is intended to apply to all federal facilities: please promote trails for biking and hiking on all of your properties. I cannot see why security, especially since 9/11/011, would preclude recreational trails on federal property. Near where I live on [REDACTED], we used to be able to run and exercise on the roads on the federal property but can do so no longer. I feel the security is unnecessary at this level. The public should be able to recreate on public property. Please pass this comment on to GSA and other federal facilities.
5. Please set up communication levels with community involvement around you to discuss issues of concern with the community, especially traffic, hiking, biking, commuter busing, clean air and clean water. Please do not you set yourselves up as a stovepipe that is non-communicative with the surrounding neighborhoods and businesses. Please continue to have email lists and communication with the neighborhood advisory groups surrounding the agricultural center and city and county agencies. Please communicate closely with the elected local officials to take local concerns into account.
6. Moreover, please be a good neighbor and help promote good transportation possibilities in the area around you, including railways in the Beltsville and Laurel areas, providing links to Metro rail and Metro Bus services. This is both for the purpose of your staff, your neighbors, and your constituents. Thank you.

Regards,

Jeanette Helfrich and John Rayner,
Homeowners and avid cyclists and hikers

--

Jeanette Helfrich and John Rayner

[REDACTED]

=====

From: Magdalena Scarato <[REDACTED]>
Sent: Thursday, December 24, 2020 10:17 AM
To: BEP-EIS <BEP-EIS@usace.army.mil>
Subject: [Non-DoD Source] Bureau of Engraving and Printing (BEP) Plan

To Whom It May Concern:

I am writing to express my opposition to the proposed Bureau of Engraving and Printing (BEP) plan to move its industrial and production operations from D.C. to the Beltsville Agricultural Research Center which borders the town of Greenbelt, MD. The industrial money-making factory will have many detrimental effects on our community and environment. The environmental impact statement done by The Army Corps of Engineers states very clearly that there is the potential for "significant adverse effects" particularly in terms of our water resources, traffic, noise and light pollution.

Please reconsider these plans as it will at best diminish the quality of life here and at worst result in serious environmental degradation as well potential health risks for both people and wildlife from polluted wastewater and other toxic substances.

Thank you,
Magdalena Scarato

[REDACTED]

Public Meeting Comments

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IN RE:

REPLACEMENT CURRENCY PRODUCTION FACILITY
AT THE BELTSVILLE AGRICULTURAL RESEARCH CENTER
DRAFT ENVIRONMENTAL IMPACT STATEMENT

PUBLIC WEBINAR

HELD ON
WEDNESDAY, DECEMBER 2, 2020
6:00 P.M.

12420 MILESTONE CENTER DRIVE
GERMANTOWN, MARYLAND 20876



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IN RE:
REPLACEMENT CURRENCY PRODUCTION FACILITY
AT THE BELTSVILLE AGRICULTURAL RESEARCH CENTER
DRAFT ENVIRONMENTAL IMPACT STATEMENT
PUBLIC WEBINAR
HELD ON
WEDNESDAY, DECEMBER 2, 2020
6:00 P.M.

MS. KELLAR: Hello. My name is Jennifer, and I am the facilitator for today's call. As a reminder, this call is being recorded to maintain a record of the discussion and public comments received. Your participation in this call indicates your consent to be recorded.

This public webinar will discuss the Draft Environmental Impact Statement, or Draft EIS, for the U.S. Department of the Treasury's Proposed Replacement Currency Production Facility within the National Capital Region, which is the greater Washington, D.C., area. Treasury is pursuing this proposed action on behalf of the Bureau of Engraving and Printing, or BEP, which is a bureau within Treasury.

This PowerPoint presentation will be

1 posted online within the next couple of days. If
2 you do not have internet access, we recommend
3 grabbing a pen and paper to write down relevant
4 information during this presentation, such as the
5 mailing address.

6 Additionally, we have ensured that this
7 meeting is accessible to all parties. Relevant
8 information is included in the visual and verbal
9 presentations. Please note that we also have
10 American Sign Language translators, Levi Myers and
11 Felicia Pickering, present for today's call.
12 Throughout the presentation, the translator's video
13 will be pinned at the top of the list of
14 participants in the WebEx platform. We recommend
15 using the Side-by-Side WebEx view to see both the
16 PowerPoint and the translator. Finally, a written
17 transcript of today's meeting will also be posted on
18 the project website for your reference.

19 Treasury is conducting this webinar during
20 the 45-day public comment period for the Draft EIS.
21 The public comment period began on November 6th when
22 Treasury published in the Federal Register and local
23 newspapers a Notice of Availability of the Draft EIS
24 for public review and comment. The public comment
25 period will end on December 21st, 2020.

1 In light of the restrictions on public
2 gatherings due to the COVID-19 pandemic, we are
3 hosting this two-hour webinar in lieu of a
4 traditional, in-person public meeting. Similar to a
5 traditional public meeting, this webinar will
6 include a brief presentation, including a
7 PowerPoint, of the National Environmental Policy
8 Act, or NEPA, process, Treasury's proposed action
9 and the results of the Draft EIS, as well as an
10 opportunity for members of the public to provide
11 comments on the Draft EIS.

12 Because the proposed action would also
13 require construction in up to 0.94 acre of wetlands,
14 Treasury prepared and published a Draft Finding of
15 No Practicable Alternative, or FONPA, in accordance
16 with Executive Order 11990. Today's webinar is also
17 an opportunity for the public to comment on this
18 Draft FONPA.

19 Please note that while we will be taking
20 public comments on the Draft EIS and Draft FONPA
21 during this webinar, we will not be responding to
22 comments or questions at this time. All relevant
23 comments and questions received today will be
24 addressed appropriately in the Final EIS, which is
25 expected to be completed in Spring 2021. We will

1 review the procedures for submitting comments in a
2 few minutes at the beginning of the comment
3 opportunity.

4 First, I would like to note the project
5 website and the materials that have been provided
6 online for public review. For those who cannot see
7 the PowerPoint, the project website is
8 <https://www.nab.usace.army.mil> -- that's m-i-l --
9 /home/bep-replacement-project/. If you Google BEP
10 Replacement Project, it should be the first result.
11 On the project website, we have provided numerous
12 materials for the public to read, including most
13 importantly the Draft EIS. In addition, we have
14 provided supporting analyses, background reports,
15 project-specific studies, and informational posters
16 summarizing the project.

17 Finally, I would like to point you to our
18 online reading room, which we have established to
19 recreate a traditional in-person open house. This
20 reading room contains a virtual display of the
21 project posters and other materials in an easy-to-
22 use online medium. The link to this reading room is
23 <https://bep-eis.consultation.ai/>. You can also
24 access this online reading room through the main
25 project website.

1 If you do not have internet access, you
2 may request hard copies of relevant materials to be
3 mailed to you. You can make this request during the
4 public comment opportunity during this call or by
5 mailing your requests to the address we are about to
6 provide.

7 The Draft EIS for Treasury's proposed
8 Currency Production Facility has been prepared in
9 accordance with NEPA to evaluate the potential
10 environmental and socioeconomic impacts of the
11 proposed action.

12 Under NEPA, an EIS is used to identify
13 potential significant impacts that could result from
14 a federal action. To do this, federal agencies
15 identify significance thresholds for potential
16 impacts to each resource area studied, which are
17 described in the Draft EIS. At a high level,
18 significant impacts are generally those with serious
19 consequences on a resource area, which are obvious
20 or readily noticed by an observer. We'll discuss
21 the potential for the proposed currency production
22 facility to have significant impacts a little later.

23 Preparing an EIS is a multi-step process,
24 and public involvement is a critical component. The
25 NEPA process for this project officially began with

1 Treasury's publication of a Notice of Intent, or
2 NOI, to Prepare an EIS in the Federal Register on
3 November 15, 2019. This NOI initiated a 30-day
4 scoping period, during which Treasury held a Public
5 Scoping Meeting for the proposed action on December
6 3rd, 2019, at the Beltsville Agricultural Research
7 Center. Some of you likely attended that meeting.
8 We thank you for your continued participation.

9 The 30-day scoping period was the first
10 opportunity for stakeholders to comment on the
11 proposed action. Treasury engaged federal, state,
12 and local government leaders; Native American
13 Tribes; nongovernmental organizations; and members
14 of the public to gauge topics of regulatory and/or
15 public concern. Treasury summarized the public
16 scoping results, including your comments, in the
17 Public Scoping Report that is available on the
18 project website.

19 Over the last year since the scoping
20 meeting, Treasury used the scoping results and
21 independent research to prepare a Draft EIS that
22 describes the proposed action, evaluates potential
23 environmental and socioeconomic impacts, including
24 both adverse and beneficial impacts, and identifies
25 practical mitigation measures that Treasury could

1 implement to reduce potential adverse impacts.

2 As mentioned earlier, the Draft EIS is
3 currently available for a 45-day public comment
4 period, which began on November 6th and will end on
5 December 21st, 2020. This is the second and final
6 public comment opportunity.

7 Following the Draft EIS public comment
8 period, Treasury will prepare and publish the Final
9 EIS, which will appropriately address all comments
10 received on the Draft EIS. Treasury currently
11 anticipates publishing the Final EIS in Spring 2021.
12 Thereafter, Treasury will publish its Record of
13 Decision, which will announce its decisions
14 regarding whether to implement the proposed action
15 and which mitigation measures it will implement to
16 reduce potential adverse impacts. The Record of
17 Decision will be published no sooner than 30 days
18 after the Final EIS is published, currently
19 anticipated for Summer 2021.

20 We will now provide a brief background and
21 overview of the proposed action. Treasury --
22 Treasury currently prints paper money at two
23 production facilities, one in downtown Washington,
24 D.C., and one in Texas. The D.C. facility was
25 constructed in 1918 and has now operated for over

1 100 years. Its condition, configuration, and
2 location limit the BEP's ability to modernize its
3 operations through renovation.

4 Treasury needs the proposed action because
5 the D.C. facility is effectively obsolete. It
6 cannot support the BEP's current and future mission
7 of producing increasingly technologically
8 sophisticated U.S. paper currency, cash. And
9 contrary to some popular beliefs, studies show that
10 the demand for cash is expected to continue to rise
11 in the future, despite the increasing prevalence of
12 digital payments. Based on more than 20 years of
13 research and planning, Treasury, as well as the
14 Government Accountability Office, have determined
15 that replacing the D.C. facility with a new currency
16 production facility is the best, most cost-effective
17 solution to overcome the limitations of the D.C.
18 facility.

19 The purpose of the proposed action,
20 therefore, is to construct and operate a new,
21 approximately one-million-square-foot currency
22 production facility on a parcel of land that meets
23 the BEP's size and location requirements.

24 To meet this purpose and need, Treasury
25 evaluated over 80 potential locations in the

1 National Capital Region based on a set of very
2 specific requirements for screening criteria for the
3 proposed currency production facility. These
4 requirements included location, size, accessibility,
5 availability, and developability and are detailed in
6 the Draft EIS.

7 After a thorough analysis, Treasury
8 determined that only the Beltsville Agricultural
9 Research Center, or BARC, met the specific site
10 requirements for the proposed currency production
11 facility. The proposed project site is located on a
12 104-acre parcel on BARC between Powder Mill Road and
13 Odell Road at the intersection of these roads with
14 Poultry Road. This site primarily consists of
15 cropland, open meadows with scattered trees, and
16 approximately 20 abandoned and deteriorating
17 buildings formerly used for poultry research.

18 The Agriculture Improvement Act of 2018,
19 commonly known as 2018 Farm Bill, specifically
20 authorized the U.S. Department of Agriculture, or
21 USDA, to transfer this parcel to the BEP.

22 Under the proposed action, the USDA would
23 transfer ownership of this parcel to Treasury.
24 Treasury would then construct an approximately one-
25 million-square-foot production facility and

1 associated employee parking. Treasury would also
2 construct a new entrance road to this parcel from
3 Powder Mill Road, which would require constructing
4 several improvements to Powder Mill Road as well.
5 Existing forested buffers of this site to the east
6 and north, such as those along Odell Road, would be
7 retained onsite.

8 A very preliminary conceptual design
9 layout of the proposed action is shown on the
10 PowerPoint and in the Draft EIS. This design is
11 intended to improve reader understanding of the
12 proposed action and facilitate the environmental
13 impact analysis. Please note, however, that it
14 could change as the design process progresses.

15 If Treasury decides to implement the
16 proposed action, it would complete the design and
17 permitting process between 2021 and 2022. Treasury
18 anticipates that the proposed Currency Production
19 facility would achieve a LEED Silver certification
20 by incorporating various green infrastructure, low
21 impact development, and other sustainability
22 features, such as solar panels, into the design.
23 Treasury would also follow all regulatory
24 requirements and implement numerous voluntary
25 environmental protection measures intended to

1 proactively reduce potential adverse impacts to the
2 resources onsite and to the local community. These
3 measures are detailed in the Draft EIS.

4 Construction of the proposed action would
5 then occur between 2022 and 2025, after which the
6 BEP would incrementally transition its production
7 personnel, equipment, and operations from the D.C.
8 Facility to the new facility by 2029. In total,
9 approximately 1,600 employees would work at the new
10 facility. Treasury anticipates that the lifespan of
11 the new facility would be at least 50 years.

12 Treasury evaluated two alternatives in the
13 Draft EIS, which are the Preferred Alternative and
14 the No Action Alternative.

15 The Preferred Alternative includes
16 implementing the Proposed Action at BARC as
17 described in the Draft EIS. This alternative would
18 address the purpose of and need for the proposed
19 action, which is that Treasury's existing D.C.
20 Facility is no longer able to meet the BEP's
21 Currency Production mission and must be replaced.

22 Under the No Action Alternative, Treasury
23 would not implement the Proposed Action at BARC and
24 will continue operations in its existing deficient
25 D.C. Facility to the extent possible. The USDA

1 would continue to own and operate the proposed
2 project site at BARC. The No Action Alternative
3 would not achieve the purpose of and need for the
4 proposed action, but was retained for detail
5 analysis to provide a comparative baseline against
6 which to analyze the potential effects of the
7 Preferred Alternative.

8 The Draft EIS analyzes the potential
9 impacts of the Preferred Alternative and No Action
10 Alternative on the following 13 resource areas:
11 Land use; visual resources; air quality; noise;
12 geology, topography, and soils; water resources;
13 biological resources; cultural resources; traffic
14 and transportation; utilities; socioeconomic and
15 environmental justice; hazardous and toxic materials
16 and waste; and human health and safety.

17 Of these 13 resource areas, the Draft EIS
18 identified potential significant adverse impacts to
19 five of them. The Preferred Alternative could
20 significantly and adversely impact visual resources,
21 water resources, cultural resources, traffic and
22 transportation, and environmental justice
23 communities.

24 Significant visual resources impacts could
25 result from an increase in nighttime lighting levels

1 at the project site and to residences along Odell
2 Road that would be able to see the facility.
3 Significant water resources impacts could result
4 from the diversion or fill of approximately 227
5 linear feet of onsite streams. Significant cultural
6 resources impacts could result from adverse viewshed
7 impacts on the BARC Historic District. And
8 significant traffic impacts could result from
9 increased traffic at six nearby intersections, which
10 are identified in the Draft EIS. Since these
11 traffic impacts would occur in an area with large
12 minority populations, they could also result in
13 significant adverse environment justice impacts.

14 For comparison, the No Action Alternative
15 would have significant adverse impacts on two
16 resource areas: Cultural resources and traffic and
17 transportation. Please note that these impacts
18 would result from the continuation of existing
19 conditions. Treasury would have no role in these
20 impacts.

21 Significant cultural resources impacts
22 could result from the continued deterioration of
23 onsite abandoned buildings, which are contributing
24 resources to the BARC Historic District.

25 Significant traffic impacts could result from

1 increased traffic at two nearby intersections, as
2 shown in the Draft EIS.

3 Other than these significant adverse
4 impacts, all impacts would be negligible, less-than-
5 significant adverse, or beneficial.

6 We realize that this is a very brief
7 overview of the Draft EIS and encourage you to
8 review the Draft EIS and other materials posted on
9 the project website to gain a better understanding
10 of the Proposed Action, alternatives, and potential
11 impacts on environmental resources.

12 With that, we will transition into the
13 public comment opportunity for today's webinar,
14 starting with the ground rules.

15 As a reminder, this call is being recorded
16 to maintain a record of the discussion and of the
17 comments received during the meeting. Your
18 participation in this call indicates your content --
19 consent to be recorded. Felicia, would you like to
20 take over?

21 **MS. PICKERING:** Yeah. Thank you. Can you
22 pin me --

23 **MS. KELLAR:** Yeah.

24 **MS. PICKERING:** Thank you.

25 **MS. KELLAR:** Okay. We're just switching

1 ASL interpreters.

2 Okay. Great. The procedures for
3 providing a comment during this meeting will be as
4 follows: All callers are currently muted. If you
5 would like to make a comment, please hit the Raise
6 Hand button on the WebEx meeting. You may need to
7 click on the three dots at the bottom of the screen
8 view to view the Raise Hand feature. This will let
9 us know to unmute your line. Each commenter will be
10 unmuted for up to three minutes to state your
11 comment. I will give a 30-second warning before
12 your time ends.

13 If you are not using the WebEx platform,
14 such as those who have only called in by phone,
15 there is no Raise Hand option. Therefore, we will
16 unmute your lines individually and ask if you would
17 like to make a comment. If you have no comment, you
18 can simply -- simply state, "No comment." We will
19 do that following going through the raised hands.

20 At the beginning of your comment, if you
21 wish to be identified, please state your name,
22 affiliation, and contact information (phone and
23 email). If you are a member of the general public
24 and wish to remain anonymous, you may state that
25 instead.

1 As another reminder, all comments or
2 questions provided tonight will be transcribed and
3 addressed appropriately in the Final EIS. Treasury
4 will not be providing responses tonight.

5 If you would prefer to submit a comment in
6 writing rather than verbally during this meeting,
7 there are three methods by which you can do this:
8 On the project website; by emailing BEP-
9 EIS@usace.army.mil; or by mailing a letter to
10 Attention: Bureau of Engraving and Printing Project
11 EIS, U.S. Army Corps of Engineers, Baltimore
12 District Planning Division, 2 Hopkins Plaza, 10th
13 Floor, Baltimore, Maryland 21201. All comments must
14 be submitted or post-marked by December 21st, 2020,
15 when the public comment period ends, to ensure
16 equitable consideration in the Final EIS.

17 We are now ready to take comments from
18 audience members who have called in. Please hit the
19 Raise Hand button on WebEx to notify us that you
20 would like to be called upon. I know we have a long
21 list of participants, so I'll be scrolling and --
22 and looking for any raised hands.

23 Okay. I'll give it a few more moments,
24 and then we can turn our attention to those who have
25 dialed in by phone. And I'll just check each one to

1 see if there are any comments there. But I'll give
2 it a couple more minutes for any raised hands.

3 **MR. DAVIS:** Hey, Jennifer. This is Chuck
4 Davis. I don't see the Raise Hand button. I'm
5 wondering if that's something you have to implement.

6 **MS. STOLL:** Yeah. I don't see it either.

7 **MS. KELLAR:** Okay. I see it on -- on my
8 end. Let's see.

9 **FEMALE SPEAKER:** It's not here either.

10 **MS. STOLL:** Yeah. You go to the three
11 dots, and you don't get that as an option.

12 **MS. KELLAR:** All right. Well, that's a
13 twist. Okay. Well, I'm not sure that we'll be able
14 to troubleshoot that in real time. I think that our
15 best bet in that case is to go through the list.
16 I'll call on folks, and if you have a comment, we'll
17 give you the opportunity to provide it.

18 Okay. I'm just going to go through in
19 alphabetical order. And Taylor, who is handling
20 muting and unmuting, will unmute you if you are
21 unable to unmute yourself.

22 The first user is AK. If you have a
23 comment, you're welcome to speak up now.

24 **(No audible response.)**

25 **MS. KELLAR:** Okay. The next user is

1 Albert Klein. Any comment?

2 (No audible response.)

3 MS. KELLAR: Okay. Amanda Malcolm?

4 MS. MALCOLM: The only comment I have is
5 that this site is located in Tier (inaudible).

6 Thank you.

7 MS. KELLAR: I'm sorry. Can you repeat
8 that? I -- I lost the last part.

9 MS. MALCOLM: Yeah. I just wanted to note
10 that the location, the site location, is in Tier II
11 watershed.

12 MS. KELLAR: Tier II watershed. Okay.

13 Thank you. Amanda Sigillito? Sorry.
14 (Inaudible).

15 MS. SIGILLITO: That's quite all right. I
16 have no comments at this time.

17 MS. KELLAR: Okay. Thank you. Amy Guise?

18 MS. GUISE: No comment.

19 MS. KELLAR: Thank you. Andrew Barthel?

20 MR. BARTHEL: No comment.

21 MS. KELLAR: Thank you. Benjamin Obenland?

22 MR. OBENLAND: No comment.

23 MS. KELLAR: Thank you. Beverly Russell?

24 (No audible response.)

25 MS. KELLAR: Okay. Cal Mather?

1 **MR. MATHER:** No comment.

2 **MS. KELLAR:** Thank you. Okay. Now I'm to
3 call-in users. I'll go through the digits. I've
4 got the first six, so we'll see if that works, and
5 you can identify yourselves by that. The first one
6 is 301641.

7 **(No audible response.)**

8 **MS. KELLAR:** Okay. We've got a 301741.

9 **(No audible response.)**

10 **MS. KELLAR:** 410212?

11 **(No audible response.)**

12 **MS. KELLAR:** 703447?

13 **(No audible response.)**

14 **MS. KELLAR:** 301275?

15 **(No audible response.)**

16 **MS. KELLAR:** 301580?

17 **(No audible response.)**

18 **MS. KELLAR:** Okay. Thanks for your
19 patience. I know it's -- this is challenging to go
20 through numbers. We're back to names. I've got
21 Carla.

22 **(No audible response.)**

23 **MS. KELLAR:** How about Carlton Hart?

24 **MR. HART:** Yeah. Carlton Hart with NCPC.

25 We don't have any comments at this point, but we

1 will be submitting comments by the -- the deadline
2 in -- at the end of the month.

3 **MS. KELLAR:** Thank you.

4 **CARLA:** This is Carla. I don't have any
5 comments at the moment.

6 **MS. KELLAR:** Okay. Thank you. Sorry I
7 didn't give you enough time there to chime in.

8 **CARLA:** (Inaudible).

9 **MS. KELLAR:** Carrie Traver?

10 **MR. SHENELL:** Hello. Can you hear me?

11 **MS. KELLAR:** Yes.

12 **MR. SHENELL:** Oh, I was having a technical
13 difficulty. This is 301580.

14 **MS. KELLAR:** Yes. Go ahead.

15 **MR. SHENELL:** Sorry. I tried to respond
16 when you prompted. But it's -- Jeff Shenell is my
17 name, and I will also be providing written comments.

18 But for now, I'm not representing any
19 organization. I'm just speaking on my own behalf.

20 And I've been using the site for over 20
21 years for watching wildlife, bird watching, and that
22 sort of thing in the public areas and also
23 participating in some of the wildlife research
24 that's been done in the last four to five years,
25 specifically the birds. But that's just as an

1 individual.

2 There -- there is a huge amount of
3 wildlife that is, you know, mostly locally important
4 based on the habitat values that are there, and
5 there's a lot of resources that I think should have
6 been covered in your -- in your draft document. The
7 amount of information is mostly inadequate in terms
8 of the Biological Resources section, and the
9 impacted environmental and the environmental
10 consequences, the analysis.

11 There is -- you know, really, I -- I've
12 been working with NEPA for over 20 years, and I
13 would consider this document to be mostly inadequate
14 in the information that you provided. It -- it --
15 it's -- it's more on the level of environmental
16 assessment. And even for something that simple, it
17 would be considered, in my opinion, to be grossly
18 inadequate. It literally only got about 4 to 10
19 lines of information in the Wildlife section and --
20 and the migratory birds. And the information is
21 basically, I -- I think, just dismissed in -- in --
22 in the sense that it's not considered to be
23 significant. But your conclusory statement are --
24 are not documented by any of the information you
25 presented.

1 So you -- you need more information on the
2 actual resources in the affected area, and you need
3 more analysis on those resources, or at least some
4 documentation of how you're drawing your conclusions
5 of no significant impacts.

6 And I think, by and large, there's a lot
7 of information available to you that I -- I'm quite
8 baffled as to why it wasn't provided in this
9 document. The -- the --

10 **MS. KELLAR:** Thirty -- you're at the
11 thirty-second -- thirty-second mark.

12 **MR. SHENELL:** So I'll provide some more
13 information to you in written comments. I also --

14 **MS. KELLAR:** Thank --

15 **MS. PICKERING:** -- was concerned about the
16 site you've chosen, and there's no justification as
17 to why that's the only site.

18 **MS. KELLAR:** Okay. We're at -- we're at
19 three minutes. Thank you for your comment.

20 **THE REPORTER:** And Ms. Kellar, this is the
21 court reporter. Just to -- a reminder for the
22 participants to state their name and spell it if
23 they wish to be in the record. Also, if everyone
24 can mute their audio if they're not speaking. Thank
25 you.

1 **MS. KELLAR:** Thank you. Okay. So we were
2 at Carrie Traver -- Traver.

3 **(No audible response.)**

4 **MS. KELLAR:** Charlene Williams.

5 **(No audible response.)**

6 **MS. KELLAR:** Cheryl East.

7 **MS. EAST:** Hello. This is Cheryl East.

8 And I actually work in a building right
9 near where the proposed site is going to be, and I
10 commute to work every day from St. Mary's County.
11 And I'm concerned about the extra traffic on the
12 one-way roads on Powder Mill Road and the condition
13 of the roads and if there's going to be any
14 improvements made or expansions. Thank you.

15 **MS. KELLAR:** Thank you. Chizo Irechukwu.

16 I'm sorry, I'm probably butchering your
17 name. First name is C-h-i-z-o?

18 **MS. IRECHUKWU:** Yes. Hi, Jennifer. It's
19 Irechukwu. I have no comments at this time.

20 **MS. KELLAR:** Thank you.

21 **THE REPORTER:** Sorry. Can you please
22 state your name and spell it? Thank you.

23 **MS. IRECHUKWU:** Sure. It's Chizo, C-h-i-
24 z-o, last name I-r-e-c-h-u-k-w-u, Irechukwu.

25 **MS. KELLAR:** Thank you. Christine Osei?

1 **MS. OSEI:** This is Christine with Prince
2 George's County Planning. I don't have any comments
3 at this time.

4 **MS. KELLAR:** Thank you. Dan Laird?

5 **(No audible response.)**

6 **MS. KELLAR:** David Kacka -- Kacka?

7 **MR. KACKA:** No comments.

8 **MS. KELLAR:** Thank you. Debbie McKinley?

9 **(No audible response.)**

10 **MS. KELLAR:** Okay. I've got DH.

11 **DH:** No comments. Thank you.

12 **MS. KELLAR:** Thanks. DK Lewis?

13 **(No audible response.)**

14 **MS. KELLAR:** Elaine Shell?

15 **(No audible response.)**

16 **MS. KELLAR:** Ethan?

17 **(No audible response.)**

18 **MS. KELLAR:** Eugene Jones?

19 **(No audible response.)**

20 **MS. KELLAR:** Eva Falls?

21 **MS. FALLS:** No comment.

22 **MS. KELLAR:** Thank you. Eve Schumen?

23 **MS. SCHUMEN:** Hi. Eve Schumen from

24 Senator Chris Van Hollen's office. No comment.

25 **MS. KELLAR:** Thank you. Basca (phonetic)?

1 (No audible response.)

2 MS. KELLAR: Francis Young?

3 (No audible response.)

4 MS. KELLAR: Gail Mackiernan?

5 MS. MACKIERNAN: Yes. Gail Mackiernan.

6 I'll -- do you have the spelling of my
7 name? You probably need it; don't you? The last
8 name is spelled M-a-c-k-i-e-r-n-a-n. The first name
9 is Gail, G-a-i-l.

10 I'm on the Maryland Ornithological
11 Society's State Conservation Committee. I'm also
12 retired from the EPA Chesapeake Bay Program and the
13 University of Maryland Sea Grant Program. So my
14 primary interest is not only in the natural
15 resources, but also in the hydrology of the region
16 and the potential impact of this on the receiving
17 waters of Beaverdam Creek.

18 I realize I need to look at this EIS a
19 little bit more. I'm concerned about the amount of
20 effluent treatment. Effluent would be almost
21 doubling the permitted amount of Beaverdam Creek
22 from this facility and also filtration replacement
23 of infiltrating meadows and woods with impervious
24 (inaudible).

25 So I will make comment and send them

1 Friday. Thank you.

2 **MS. KELLAR:** Thank you. George Myers?

3 **(No audible response.)**

4 **MS. KELLAR:** I've got Griener, P.

5 **MS. GRIENER:** No comment.

6 **MS. KELLAR:** Thank you. Holly Simmons?

7 **MS. SIMMONS:** Hi. Holly Simmons with City

8 of Greenbelt. I have no comment at this time.

9 **MS. KELLAR:** Thank you. Howard Zhang?

10 **MR. ZHANG:** This is -- this is Howard

11 Zhang. I'm the Center Director of BARC. No

12 comment.

13 **MS. KELLAR:** Okay. Thank you. I actually

14 see some hands raised. So I'm going to skip to the

15 raised hands, and then we will come back to the

16 alphabetical list. But I do see that that is --

17 that function is working for some. So just a

18 moment. Melissa Daston, I see your hand is up.

19 **MS. DASTON:** (Inaudible).

20 **THE REPORTER:** Stop. Stop. Please repeat

21 your statement and your name. Thank you.

22 **MS. DASTON:** (Inaudible).

23 **MS. KELLAR:** I'm sorry, Melissa. We're --

24 we're having an issue with your audio. It's coming

25 through garbled.

1 **MS. DASTON:** (Inaudible).

2 **THE REPORTER:** Let the record reflect the
3 speaker was inaudible. So either they can repeat
4 their statement, or it will be stricken from the
5 record.

6 **MS. KELLAR:** Okay. We'll give you a few
7 moments, Melissa, and then we'll come back. I see
8 Michael Hartman's hand is raised.

9 **MR. HARTMAN:** Yes. First of all, I want
10 to thank the interpreters for interpreting, doing a
11 good job. If you go back to the slide on adverse
12 impact, I'm confused about something. Is it
13 possible to go back a couple of slides? No, no.

14 Keep going. No, you went back too far.

15 Oh, yeah, yeah, yeah. That's it. Yep.

16 All right. The No Action Alternative, I'm not --
17 I'm not understanding how there could be cultural
18 resources adverse impact --

19 **THE REPORTER:** Mr. Hartman?

20 **MR. HARTMAN:** -- by not doing anything.

21 You mentioned something about the
22 buildings themselves. But it seems to me if you
23 just tore down the buildings that are a problem, you
24 don't have to deal with the Bureau of Engraving and
25 Printing building to fix that.

1 And I'm very concerned about traffic on
2 Powder Mill Road and other access areas that people
3 use during the week to get into Greenbelt. I'm -- I
4 live in Greenbelt. My name is Michael Hartman, and
5 I live in Greenbelt. And I'm very concerned about
6 the impact on the studies you did not do on
7 Greenbelt because people could take a shortcut from
8 the BW Parkway if they didn't want to take Powder
9 Mill Road or if they're coming north.

10 Anyway, so those are my comments, and I
11 will make others in writing to the website. Thank
12 you.

13 **MS. KELLAR:** Okay. Let's go back to
14 Melissa Daston. Melissa?

15 **MS. DASTON:** (Inaudible).

16 **MS. KELLAR:** Well, same (inaudible).

17 **UNIDENTIFIED FEMALE:** Can you provide her
18 a phone number to call in?

19 **MS. KELLAR:** There is a phone number
20 option when you -- when you go to the WebEx
21 invitation. I don't have it at my fingertips.

22 **THE REPORTER:** Can the last speaker please
23 identify themselves for the record?

24 **UNIDENTIFIED FEMALE:** That was just
25 audience participation, no record. The person --

1 **MS. KELLAR:** Well --

2 **UNIDENTIFIED FEMALE:** -- before that, can
3 you enter that --

4 **MR. HARTMAN:** I did. I did.

5 **UNIDENTIFIED FEMALE:** -- Michael Hartman.

6 **MR. HARTMAN:** Yeah, I did. Thank you.

7 **MS. KELLAR:** Thank you. Okay.

8 **MR. ROBERTS:** I'm --

9 **MS. KELLAR:** Recognizing the -- I'm sorry?

10 **MR. ROBERTS:** I'm trying to raise my hand,
11 but I don't see any way to actually raise it on the
12 --

13 **MS. KELLAR:** Okay. You can go ahead and
14 state your name, please.

15 **MR. ROBERTS:** This is Rodney Roberts with
16 the Greenbelt City Council.

17 **MS. KELLAR:** Okay.

18 **MR. ROBERTS:** Yeah. My --

19 **MS. KELLAR:** Go ahead.

20 **MR. ROBERTS:** -- comments were that this
21 project is inappropriate for the farm. This is an
22 industrial use of a farm area. And the amount of --
23 amount of wastewater and the effluent that would
24 dumped into Beaverdam Creek is -- is unacceptable.
25 I mean, that -- that creek cannot handle what is

1 being proposed to go into it. And that's going to
2 have a very big impact on not only Beaverdam Creek,
3 but down the stream from Beaverdam Creek and the
4 Indian Creek and down into the Anacostia and -- and
5 on down. So this project is being sited in the
6 wrong place. It should not be on BARC at all.

7 So I have other comments, but I won't say
8 them all right now because, obviously, I can't say
9 them all in three minutes. But thank you for giving
10 me a chance to speak.

11 **MS. KELLAR:** Of course. Thank you.

12 **MS. STOLL:** Excuse me. Can he identify
13 himself again?

14 **MS. KELLAR:** That was Rodney Roberts.

15 **MR. ROBERTS:** With the Greenbelt City --

16 **MS. STOLL:** Thank you.

17 **MR. ROBERTS:** -- Council.

18 **MS. KELLAR:** Okay. I don't see any other
19 raised hands. I recognize that some folks are
20 having an issue locating that. I'm going to go back
21 to the alphabetical listing. Last name is Grigsby.

22 Any comment?

23 **MR. GRIGSBY:** No comments.

24 **MS. KELLAR:** Thank you. Jeff Schunot?

25 **(No audible response.)**

1 **MS. KELLAR:** Jeff Karms?

2 **JEFF:** Sorry. This is Jeff. I -- I
3 previously gave you comments on -- on my phone, 301-
4 --

5 **MS. KELLAR:** Okay.

6 **JEFF:** -- 580, et cetera.

7 **MS. KELLAR:** Great. Thank you.

8 **JEFF:** Thank you.

9 **MS. KELLAR:** Jennifer Stabler?

10 **MS. STABLER:** Hi. This is Jennifer
11 Stabler, S-t-a-b-l-e-r. I'm with the Prince
12 George's County Planning Department. I'm in the
13 Historic Preservation section. (Inaudible) Grange is
14 a county historic (inaudible), so we'd kind of be
15 concerned about the viewshed from the -- from Walnut
16 Grange to the proposed construction. So it would be
17 -- it would be helpful to have a view -- a viewshed
18 study.

19 And I'm also curious whether the -- the
20 buildings that are proposed to be removed are going
21 to be reported on a Maryland Inventory of Historic
22 Properties form. I haven't read through the entire
23 document yet, so that may be in there.

24 And then I'll be commenting separately on
25 the impacts of the archaeological resources. But we

1 will also submit written comments at a later time.

2 That's it.

3 **MS. KELLAR:** Thank you. Jim Wink?

4 **MR. WINK:** No comment.

5 **MS. KELLAR:** Okay. I see we've got a John
6 Doe.

7 **(No audible response.)**

8 **MS. KELLAR:** Jose Lopez?

9 **(No audible response.)**

10 **MS. KELLAR:** Joseph Ruocco?

11 **MR. RUOCCO:** No comment.

12 **MS. KELLAR:** Karen Mathis?

13 **MS. MATHIS:** No comment.

14 **MS. KELLAR:** Thank you. Katherine Welton?

15 **(No audible response.)**

16 **MS. KELLAR:** Kenneth Shallop (phonetic)?

17 **(No audible response.)**

18 **MS. KELLAR:** Okay. I've got L. Saffell --
19 Saffell.

20 **MS. SAFFELL:** Linda Saffell, Last name is
21 S-a-f-f-e-l-l.

22 I acknowledge the comments of the previous
23 commenters. I also want to buttress the comments of
24 the EPA on the EIS. I think the project is
25 inappropriate for the site. I'll be submitting my

1 written -- written comments in the future, too.

2 Thank you.

3 **MS. KELLAR:** Thank you. Okay. Just give
4 me a moment. Lauren Nelson?

5 **MS. NELSON:** No comments.

6 **MS. PICKERING:** Jennifer, we're going to
7 switch interpreters. So can you pin Levi, please?
8 Thank you.

9 **MS. KELLAR:** Yes. Okay. Levi, can you
10 say something? And then I can get, you know ...

11 **MR. MYERS:** It's Levi here.

12 **MS. KELLAR:** Okay. There you are. Okay.
13 All set. Thank you. All right. I think I called on
14 Lauren Nelson. Leia Arnold?

15 **(No audible response.)**

16 **MS. KELLAR:** Lisa?

17 **(No audible response.)**

18 **MS. KELLAR:** Lydia Washington?

19 **MS. WASHINGTON:** No comment.

20 **MS. KELLAR:** Thank you. M. Holt?

21 **(No audible response.)**

22 **MS. KELLAR:** Marcia Van Horn?

23 **(No audible response.)**

24 **MS. KELLAR:** Maria?

25 **(No audible response.)**

1 **MS. KELLAR:** Martha Tomecek?

2 **MR. CAVIGELLI:** Hello. Can you hear me?

3 **MS. KELLAR:** Yes. Go ahead.

4 **MR. CAVIGELLI:** Hi. I am Martha Tomecek's
5 husband, and --

6 **MS. KELLAR:** Okay.

7 **MR. CAVIGELLI:** -- she's here with me.
8 And we -- we share the same opinions, so I'll be
9 speaking. My name is Michel Cavigelli. That's M-i-
10 c-h-e-l, last name C as in Charlie, a-V as in
11 Victor, i-g-e-l-l-i.

12 I am both -- we are both BARC employees,
13 and we are both Greenbelt residents. And as a BARC
14 employee, one of my duties is to chair what is
15 called the Ecology Committee. And one of our
16 projects is to have volunteer bird watchers access
17 this site to be able to meet the federal requirement
18 that we know what kind of biological diversity is on
19 the site. And so we have basically been able to
20 have volunteers meet this requirement for us by
21 allowing them access to the site.

22 And from that project, we know that there
23 are at least 238 species of birds found at the BARC
24 site, which is basically a hot spot in -- what's
25 called a hot spot in PG County. The site where the

1 BEP is projected to be is a unique environment in
2 that it's kind of a savannah. So there are
3 certainly species that are there that are not
4 elsewhere on this site. We know that it is a -- it
5 is a very good spot for woodpeckers, hawks. There's
6 been a painted bunting out there seen. So it's
7 attracted rare species, and so it's a pretty unique
8 site.

9 And so I would just refer back to Jeff
10 Schunot's comment and just repeat that, that it's --
11 that it's surprising how the wildlife portion is
12 just dismissed. And when I look at the footprint of
13 this project, it's just amazing how it's basically
14 the whole area is wiped out and put into impermeable
15 surfaces, which doesn't make any sense given how
16 close the -- it is to the -- the cleanest creek in
17 all of PG County, which is Beaverdam Creek, which is
18 where the -- the effluent would -- which is where
19 the water drains into. So that just doesn't make
20 any sense to me, and I'll be taking a closer look at
21 the Environmental Impact Statement and commenting on
22 that.

23 And I know that my supervisor's
24 supervisor, Howard Zhang, is listening. So I'll --
25 I'll just reach out to him and ask him -- that I'd

1 like to speak to him about this -- this project, in
2 general.

3 And I -- with that, I'll just leave it at
4 that. Thank you.

5 **MS. KELLAR:** Thank you. Okay. Michael
6 Tyse?

7 **MR. TYSE:** No comment. Journalist.

8 **MS. KELLAR:** Thank you. Michelle Garcia?

9 **(No audible response.)**

10 **MS. KELLAR:** Okay.

11 **MS. GARCIA:** Hello?

12 **MS. KELLAR:** Oh, go ahead, Michelle. Yes.

13 **MS. GARCIA:** Hi. My name is Michelle
14 Garcia, and I just want it noted for the record I'm
15 Chief of Staff to Council Member Tom Dernoga, who's
16 the Prince George's County council member for
17 District 1, which has BARC and the property that
18 we're speaking about today.

19 The council member had to step off. He
20 also was in attendance for the record. And that's
21 Dernoga, D-e-r-n-o-g-a. And I'm Michelle Garcia, G-
22 a-r-c-i-a. Thank you.

23 **MS. KELLAR:** Thank you. MJS?

24 **(No audible response.)**

25 **MS. KELLAR:** Monica Delong?

1 (No audible response.) MS. KELLAR: NK?

2 (No audible response.)

3 MS. KELLAR: Olahar L.?

4 OLAHAR: No comment.

5 MS. KELLAR: Thank you. Ross Geredien?

6 MR. GEREDIEN: Hello. Can you hear me?

7 MS. KELLAR: Yes.

8 MR. GEREDIEN: Hi. Yes. My name is Ross
9 Geredien, G-e-r-e-d-i-e-n. You need my address?

10 (No audible response.)

11 MR. GEREDIEN: Hello?

12 MS. KELLAR: (Inaudible) to provide it.

13 MR. GEREDIEN: Sure. So it's 9008 48th
14 Place in College Park, Maryland 20740.

15 So as a resident of College Park -- and
16 I'm also a volunteer surveyor for the aforementioned
17 biodiversity and avian surveys at the park -- I have
18 some significant concerns about the habitat loss and
19 also some of the data and information that seem to
20 be informing the EIS. In particular, of note, the
21 number of 12 species of migratory birds is, as
22 Michel previously mentioned, highly inaccurate.

23 I'm also concerned about your cumulative
24 effects analysis. And it seems to be very lacking
25 in any quantitative measures, particularly with

1 respect to the amount of habitat that will be
2 permanently lost in terms of the footprint of the
3 project. Once that is gone, it is gone. There is
4 no mitigation proposed for that habitat loss, and
5 there's also no quantification of the amount of
6 impermeable surface in the watershed with respect to
7 other current and existing proposed projects, such
8 as the MOGLab. This is a known existing proposed
9 project, and there's no mention of it here in the
10 cumulative effect analysis.

11 So I'm also going to be submitting written
12 comments in much more detail.

13 **MS. KELLAR:** Thank you. Scott Phillips?

14 **MR. PHILLIPS:** No comment. Thanks.

15 **MS. KELLAR:** Thank you. Solar Jack?

16 **MR. LIPART:** This is ...

17 **MS. KELLAR:** Hello?

18 **(No audible response.)**

19 **MS. KELLAR:** You're on mute.

20 **MR. LIPART:** I can't unmute myself.

21 **MS. KELLAR:** You are unmuted. You're
22 good. We can hear you now. Taylor, can you unmute
23 Solar Jack?

24 **MR. LIPART:** This is John Lipart --

25 **MS. KELLAR:** Okay. We hear you. Thank

1 you.

2 **MR. LIPART:** -- Chair of the Greenbelt
3 Green Team. And I've got three brief comments.

4 It was mentioned earlier that there's
5 going to be a greater need for cash currency. And I
6 just want to mention that Gary Cohn, Former Director
7 of the National Economic Council, just said on
8 Bloomberg TV yesterday, "I think cash can easily
9 disappear. I mean, the idea of paper currency in
10 the legitimate world is becoming more and more
11 obsolete, and I believe it can become totally
12 obsolete."

13 Second thing is I agree with Councilman
14 Rodney Roberts and another person that opposed this
15 project because it's out of compliance with the
16 existing zoning regulations, and I don't think an
17 industrial operation like this would even go for the
18 exception that the classification allows for "a
19 limited range of public recreational and
20 agricultural uses." It doesn't seem like an
21 industrial operation like that being proposed fits
22 into that category.

23 The third comment is that Michael Hartman
24 and someone else mentioned about traffic problems,
25 transportation problems. In the technical

1 background for the DEIS, it mentioned that there
2 were, I think, 12 different intersections that would
3 have significant adverse impacts. And it mentioned
4 that all but one then would not have those impacts
5 if remediation was done. But that's -- but it
6 didn't say when -- what those improvements or
7 remediation was. So we're supposed to take for
8 granted that, oh, geez, they know the answer to fix
9 all the problems to make transportation work well?

10 I think that was -- that was totally
11 lacking there. Thank you.

12 **MS. KELLAR:** Thank you. Stashia Fore?

13 **(No audible response.)**

14 **MS. KELLAR:** T. Hruby?

15 **(No audible response.)**

16 **MS. KELLAR:** Tom Sgroi, S-g-r-o-i?

17 **(No audible response.)**

18 **MS. KELLAR:** Tony Lopacki?

19 **MR. LOPACKI:** No comment.

20 **MS. KELLAR:** Thank you. Okay. That brings
21 us to the end of our list. I'll just open it up one
22 last time, and I'll give you a moment to take
23 yourself off mute. Did I miss anyone?

24 **MS. HRUBY:** Can I -- can you hear me?

25 **MS. KELLAR:** Yes.

1 **MS. HRUBY:** Yeah. This is Terri Hruby,
2 City of Greenbelt, T-e-r-r-i, last name H-r-u-b-y.

3 The Greenbelt City Council, I just wanted
4 to note, will be discussing this on December 14th
5 and will be submitting formal comments at that time.

6 **MS. KELLAR:** Thank you. Okay.

7 **MR. ORLEANS:** Hello?

8 **MS. KELLAR:** Hello. Yes? Is there one
9 more comment?

10 **MR. ORLEANS:** Hello? Orleans, Greenbelt.

11 Yes. I thought this was casual -- more
12 casually run tonight. I guess I might have thought
13 you were just reading down the names of people who
14 had clocked in. But you did not read mine, so I'll
15 take this opportunity to speak for a minute.

16 There would be lots of reasons to oppose
17 this, and I do oppose this for all of those reasons.

18 I think I, without having had a chance to
19 look at the EIS, or Draft EIS -- and I am not one
20 who can read it on my telephone, which is the only
21 (inaudible) arrange a copy either --

22 **THE REPORTER:** Wait.

23 **MR. ORLEANS:** -- a hard copy can be made
24 available to all those interested in reading it,
25 could at least be placed somewhere on BARC property

1 where one could go and in a safe setting, but not
2 (inaudible).

3 One of the main reasons to oppose this is
4 --

5 **THE REPORTER:** Please stop. Please repeat
6 your comment.

7 **MR. ORLEANS:** -- is something that I
8 suspect is not in the Draft. I don't know what
9 comments have been made about it made about tonight.
10 Hello?

11 **MS. KELLAR:** I'm sorry. You were -- you
12 were cutting out.

13 **MR. ORLEANS:** (Inaudible) reason to oppose
14 this --

15 **MS. KELLAR:** You were cutting out, and the
16 court reporter asked if you could repeat that part.
17 I'm sorry.

18 **THE REPORTER:** Please state your name and
19 spell it for the record and repeat your comment, as
20 it was cutting out and I couldn't -- was unable to
21 unmute. So thank you.

22 **MR. ORLEANS:** Bill -- Bill Orleans, O-r-l-
23 e-a-n-s.

24 I'm not someone who's had the opportunity
25 to see the Draft EIS, would wish a copy could be

1 made available to me and anyone else who wanted one,
2 or at least since the libraries are closed, one
3 placed on BARC, maybe the library there where, in a
4 safe setting, people could go and take a look at it
5 on paper rather than on their small cell phone
6 screen.

7 There would be lots of reasons to oppose
8 this, citing the Bureau of Engraving and Printing,
9 and I endorse all those reasons. But there's one I
10 think maybe has not been considered, and that is,
11 for years -- for many years -- there have been
12 interests, some sitting in Congress, who have wanted
13 to bust up BARC, who wanted to relocate not just
14 economic research service and many other elements
15 that are situated at the Beltsville farms elsewhere.

16 And I see this, frankly, as a proposal
17 emanating from that history to use it as a federal
18 campus for all manner of this and that, and it
19 should be opposed for that reason.

20 BARC could exist as an agricultural
21 research center. There have been -- I can't
22 quantify the number of improvements that could be
23 cited from research done there, but there has been
24 many. And I'd like to think that, in the future
25 where there certainly will be a need for

1 agricultural research, BARC also could be used to
2 center -- invite Future Farmers of America in for an
3 internship once a year where they could see
4 firsthand the nature of agricultural research being
5 conducted and, indeed, have the opportunity as
6 future farmers to take advantage of Beltsville's
7 proximity to Washington, D.C., and have the
8 opportunity to go in and lobby Congress about what's
9 in the interest of Future Farmers of America.

10 I would appreciate an answer to the
11 question if maybe a hard copy can be placed in the
12 library at BARC so that those of us who would like
13 to make time to go read it there would have that
14 opportunity; that is, if one can't be mailed to me.
15 I haven't got an answer to that question.

16 **MS. KELLAR:** Thank you for your comment.

17 **MR. ORLEANS:** Can there be an answer to
18 the question if a hard copy will be placed at BARC
19 so that those of us who can't read it can go there
20 and have a chance to read it there?

21 **MS. KELLAR:** I made a note of your name,
22 and we'll get back to you offline. I don't have an
23 answer to your question right now. Thank you.

24 **MR. KABIR:** Hi.

25 **MS. KELLAR:** Yes.

1 **MR. KABIR:** Yeah. Hi. My name is Fazmul
2 Kabir, F-a-z-m-u-l, last name Kabir, K-a-b-i-r. I
3 am -- I am with the City Council, City of College
4 Park. We may submit a written comment by December
5 21st from the City Council.

6 **MS. KELLAR:** Okay.

7 **MR. KABIR:** That's my comment. Thank you.

8 **MS. KELLAR:** Thank you. Okay. Seeing no
9 other raised hands and not hearing any other
10 comments --

11 **MS. MACKIERNAN:** Yes. This is Gail
12 Mackiernan again. This is not a comment on the EIS.
13 But if I could make a short comment, I am surprised
14 -- or I'm puzzled as to why there has not been any
15 input from the residents of Odell Road, who would be
16 among the most affected. I assume they have been
17 apprised of this project. Have -- have materials
18 been sent to their homes?

19 **MS. KELLAR:** Thank you for your comment.
20 The meeting was advertised, and I think that the
21 public has been made aware.

22 **MS. MACKIERNAN:** Well, I know that when we
23 had a similar project, not as large, but proposed
24 near my mother's home, she also got something in
25 writing specifically telling her she was within X

1 number of meters or yards of this project and she
2 should be aware of it. I -- I think you really need
3 to do an outreach because it is a matter of
4 environmental justice. It is in more low-income
5 area, and I think, you know, possibly these people
6 shouldn't be overlooked. Okay. Thank you.

7 **MS. KELLAR:** Thank you.

8 **MS. SAFFELL:** This is Linda Saffell. I
9 second Gail's comment.

10 **MS. KELLAR:** Thank you.

11 Okay. We would like to thank you all for
12 your interest in the Draft EIS and your
13 participation in today's call. As a reminder, you
14 may submit comments until December 21st, 2020, via
15 email. The address is BEP-EIS@usace.army.mil; via
16 U.S. mail to Bureau of Engraving and Printing,
17 Project EIS, U.S. Army Corps of Engineers, Baltimore
18 District Planning Division, 2 Hopkins Plaza, 10th
19 Floor, Baltimore, Maryland 21201. Or you can
20 comment through the project website at
21 <https://www.nab.usace.army.mil/home/>
22 I'm sorry. That's bep-replacement-project/.

23 This concludes today's call. As a
24 reminder, this presentation will be posted on the
25 project website within the next few days for future

1 reference. Thank you for participating, and have a
2 nice remainder of your evening. We appreciate your
3 participation.

4 **UNIDENTIFIED FEMALE:** Thank you.

5 **MS. KELLAR:** Thank you.

6 **UNIDENTIFIED FEMALE:** Thank you.

7 **(WHEREUPON, the Public Webinar was**
8 **concluded at 8:00 p.m.)**

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1 CERTIFICATE

2
3 I, Monica DeLong, do hereby certify that I
4 reported all proceedings adduced in the foregoing
5 matter and that the foregoing transcript pages
6 constitutes a full, true and accurate record of said
7 proceedings to the best of my ability.

8
9 I further certify that I am neither related
10 to counsel or any party to the proceedings nor have any
11 interest in the outcome of the proceedings.

12
13 IN WITNESS HEREOF, I have hereunto set my
14 hand this 16th day of December 2020.

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17 

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19 _____
20 Monica DeLong
21 WA CCR#3489
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Comment Number	Page Number	Line Number	Comment
1	13	4	"detail" should be "detailed"
2	14	13	"environment" should be "environmental"
3	14	22	"the" should follow "deterioration of"
4	19	14	"(Inaudible)" should be "Butchering it."
5	21	10	"Mr. Shenell" should be spelled "Mr. Shenot"
6	21	12	"Mr. Shenell" should be spelled "Mr. Shenot"
7	21	15	"Mr. Shenell" should be spelled "Mr. Shenot"
8	21	16	"Mr. Shenell" should be spelled "Mr. Shenot"
9	22	7	"mostly" should be "grossly"
10	22	13	"mostly" should be "grossly"
11	23	12	"Mr. Shenell" should be spelled "Mr. Shenot"
12	23	15	"Ms. Pickering" should be "Mr. Shenot"
13	25	6	Two instances of "Mr. Kacka" should be spelled "Mr. Kaczka"
14	25	7	"Mr. Kacka" should be spelled "Mr. Kaczka"
15	25	22	"Schumen" should be spelled "Shuman"
16	25	23	"Schumen" should be spelled "Shuman"
17	25	25	"Basca (phonetic)" should be "Fazka"
18	26	2	"Francis" should be "Frances"
19	26	20	"effluent treatment. Effluent would be" should be replaced with "effluent, treated effluent, that would be"
20	26	24	"(inaudible)" should be "surfaces"
21	30	12	"--" should be "screen."
22	30	23	"be" should follow "that would"
23	31	15	This line should follow Line 16 (Ms. Stoll)
24	31	24	"Schunot" should be spelled "Shenot"
25	32	1	"Karms" should be spelled "Karns"

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Comment Number	Page Number	Line Number	Comment
26	32	2	"Jeff" should be replaced with "Mr. Shenot"
27	32	6	"Jeff" should be replaced with "Mr. Shenot"
28	32	8	"Jeff" should be replaced with "Mr. Shenot"
29	33	16	Based on sign-in data, this name is spelled correctly.
30	34	14	"Leia" should be spelled "Leigha"
31	34	20	"Holt" should be spelled "Hult"
32	36	10	"Shunot's" should be spelled "Shenot's"
33	37	6	"Tyse" should be spelled "Theis"
34	37	7	"Tyse" should be spelled "Theis"
35	38	1	"Ms. Kellar: NK?" should start on a new line
36	38	3	"Olahar" should be spelled "Olijar"
37	38	4	"Olahar" should be spelled "Olijar"
38	38	17	"park" should be "BARC"
39	39	8	"MOGLab" should be "MAGLEV"
40	45	15	"I haven't got an answer to that question." should read "Can I have an answer to that question."

Comments based on audio recording and sign-in data.

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