US Department of the Treasury

Environmental Impact Statement

Draft

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US Army Corps of Engineers ®

Abstract Page

Lead Agency:	US Department of the Treasury
Title of Proposed Action:	Construction and Operation of a Currency Production Facility at the Beltsville Agricultural Research Center
Designation:	Draft Environmental Impact Statement
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Abstract: The United States (US) Department of the Treasury (Treasury) proposes to construct and operate a new Currency Production Facility at the Henry A. Wallace Beltsville Agricultural Research Center (BARC) to replace the Bureau of Engraving and Printing's (BEP's) existing production facility located in downtown Washington, DC (Proposed Action). The BEP is a bureau within Treasury. The Agriculture Improvement Act of 2018 (Public Law 115-334, § 7602; 132 Stat. 4490, 4825-26 [2018]) authorized the US Department of Agriculture to transfer a parcel of land on BARC to Treasury for this purpose. Thereafter, funding for the Proposed Action was made available by the 2019 Department of the Treasury Appropriations Act (Public Law 116-6, Division D, Title I, § 127; 133 Stat. 13, 149 [2019]). This Draft Environmental Impact Statement (EIS) examines the potential environmental impacts of the Proposed Action and its considered alternatives. The environmental resource areas analyzed in the EIS include: land use; visual resources; air quality; noise; geology, topography, and soils; water resources; biological resources; cultural resources; traffic and transportation; utilities; socioeconomics and environmental justice; hazardous and toxic materials and waste; and human health and safety. The No Action Alternative would result in significant adverse impacts to cultural resources and traffic and transportation; the Proposed Action (i.e., Preferred Alternative) would result in significant adverse impacts to visual resources, water resources, cultural resources, traffic and transportation, and environmental justice. The Draft EIS identifies recommended mitigation measures to reduce potential adverse impacts.

EXECUTIVE SUMMARY

ES.1 Introduction

The United States (US) Department of the Treasury (Treasury) has prepared this Draft Environmental Impact Statement (EIS) in accordance with the National Environmental Policy Act of 1969, as amended (NEPA; 42 US Code [USC] 4321 *et seq*.); the Council on Environmental Quality (CEQ) NEPA Regulations (40 Code of Federal Regulations [CFR] 1500-1508), and Treasury's NEPA Regulation (Treasury Directive [TD] 75-02).

ES.2 Digital Environmental Impact Statement

Pursuant to 40 CFR 1500.1(c), 40 CFR 1500.7(a)(3), Executive Orders (EO) 13766 and 13087, and recent CEQ memoranda and guidance (e.g., March 6, 2012), Treasury has streamlined this EIS while still satisfying the requirements of the regulations. To accomplish this goal, improve understanding, and expedite the NEPA process, this written document is accompanied by a "Digital EIS," or digital display of relevant data at https://www.nab.usace.army.mil/home/bep-replacement-project. Should the reader not have internet access, please contact the personnel listed on the **Abstract Page** of this EIS and accommodations will be made to provide you with hardcopies of relevant information requested.

ES.3 Background

Treasury, acting on behalf of the Bureau of Engraving and Printing (BEP), proposes to construct and operate a new Currency Production Facility (CPF) (Proposed Action) 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.

The Proposed Action is the result of Treasury's more than 20-year planning process 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.

Treasury conducted several studies concerning the Proposed Action:

- Chief Financial Officer Performance and Accountability Report (BEP, 2017)
- Bureau of Engraving and Printing 2018-2022 Strategic Plan (BEP, 2018a)
- Treasury Strategic Plan 2018-2022 (Treasury, 2018b)
- Audit and evaluation reports (Treasury, 2019a)
- Summary of Capital Investments (Treasury, 2019b)
- Agency Financial Report (Treasury, 2019c)

These studies considered several possible scenarios to achieve these objectives, including renovation of the DC Facility and new construction within the NCR. Treasury concluded that construction of a new replacement CPF, as opposed to renovation of the DC Facility, was the most efficient and cost-effective option; new construction would best enable Treasury to achieve its mission while saving taxpayers money. In 2018, the Government Accountability Office (GAO) concurred with Treasury's finding that new construction was the best, most cost-effective solution (GAO, 2018).

Additional details concerning Treasury's site selection process are described in this EIS, including how Treasury ultimately determined that implementing the Proposed Action at the US Department of

Agriculture's (USDA) Henry A. Wallace Beltsville Agricultural Research Center (BARC) is the only reasonable alternative that satisfies Treasury's purpose and need and meets Treasury's site selection criteria.

ES.4 Purpose and Need

The **purpose** of the Proposed Action is to construct and operate a new, up to 1 million square-foot CPF on a minimum 100-acre parcel of federally owned, available land within the NCR that has ready access to interstate roadways and commercial airports for transportation of US currency.

The Proposed Action would provide Treasury with a modern, scalable, sufficiently sized production facility within the NCR that meets Treasury's needs. Treasury's continued presence within the NCR would support and sustain its mission over the long-term, resulting in more efficient, streamlined currency production. It would also allow Treasury to retain its current, uniquely skilled workforce, now and in the future. The facility would improve the health and safety of Treasury's personnel and allow the BEP to comply with federal facility security standards (ISC, 2016). Over the long-term, the Proposed Action would reduce Treasury's federal footprint within the NCR by up to approximately 30 percent (in compliance with EO 13327, Office of Management and Budge [OMB] Memorandum 2015-01, and Presidential Memorandum DCPD201000483) by enabling Treasury to discontinue use of two of its three existing facilities in the NCR.

The **need** for the Proposed Action is to replace Treasury's obsolete DC Facility that is neither able to support modern currency production nor support Treasury's current and future mission. The condition, configuration, and location of the DC Facility severely limit Treasury's ability to modernize the DC Facility through renovation (GAO, 2018). The Proposed Action would replace the operationally deficient DC Facility with a smaller, strategically located, state-of-the-art CPF within the NCR. Treasury's production operations would be co-located on a single floor in an appropriately sized, reconfigurable workspace that provides flexibility to respond to economic or technological changes.

ES.5 Description of the Proposed Action

Ultimately, based on the Proposed Action's purpose and need, Treasury's site selection criteria, and the statutory authority provided by the Agriculture Improvement Act of 2018 (Public Law 115-334, § 7602; 132 Stat. 4490, 4825-26 [2018]) and the 2019 Department of the Treasury Appropriations Act (Public Law 116-6, Division D, Title I, § 127; 133 Stat. 13, 149 [2019]), Treasury determined that an approximately 104-acre parcel at BARC (Treasury's proposed parcel) was the only reasonable alternative.

As such, the Proposed Action (and the Preferred Alternative) would construct and operate an up to 1 million square-foot CPF on Treasury's proposed parcel at BARC. The CPF would range in height from approximately 40 to 50 feet above ground level. The Proposed Action would be implemented over an approximately nine-year period, after completion of the NEPA analysis and signing of the Record of Decision (ROD), anticipated to be published in approximately July 2021.

The 100 percent design of the proposed CPF is anticipated to be complete in 2021. The new CPF would be equipped with state-of-the-art technology to automate and track currency manufacturing and operate with greater efficiency. Work production flows would be flexible and reconfigurable to avoid disruptions of work in progress and respond to changing priorities during transition from the DC Facility to the proposed new facility. The Proposed Action would also include ample, strategically located storage and administrative space to support currency manufacturing. The CPF design would include numerous features to increase sustainability and provide environmental benefits, potentially including reduced air quality emissions, increased use of renewable energy sources, and minimization of stormwater discharges.

Construction of the Proposed Action would begin in 2021 or 2022. Construction would include site preparation activities, including demolition, clearing, grading, and leveling; installation of site utilities,

erosion control measures, and security measures; final grading; paving of roads and parking areas; construction of the proposed facility; landscaping; and commissioning.

Once the CPF is constructed, Treasury would gradually transition personnel and operations from the DC Facility in phases from approximately 2025 to 2029. Currency manufacturing at the DC Facility would be phased out. The DC Facility would likely be renovated to function as the BEP's administrative headquarters and support various other Treasury functions; however, this is not considered part of the Proposed Action and would be analyzed under separate NEPA documentation, when appropriate. Treasury would likely transfer its other DC Facility asset, the Annex Building located across the street from the Main Building, to the General Services Administration as surplus federal property, and discontinue its warehouse lease in Landover, Maryland. However, the plans for these facilities have not been finalized.

Treasury would incorporate Environmental Protection Measures (EPMs), Regulatory Compliance Measures (RCMs), and Best Management Practices (BMPs) into the Proposed Action to proactively mitigate potential adverse environmental impacts through "mitigation by design." Mitigation measures are recommended in this EIS for potential adverse impacts that would not be sufficiently reduced through these incorporated measures.

ES.6 Alternative Screening Process

As described in this EIS, Treasury, through its 20-year planning process, undertook a robust, logical, and sequential site screening process to narrow the number of alternative sites that would meet Treasury's requirements. Through this screening process, and ultimately enabled by the Agriculture Improvement Act of 2018 and the 2019 Department of the Treasury Appropriations Act, Treasury narrowed its focus to a single site at BARC. This process is described in detail in this EIS. In accordance with 40 CFR 1402.14(d), this EIS analyzes the Preferred (i.e., Proposed Action) Alternative at BARC and the No Action Alternative.

ES.6.1 No Action Alternative

Under the No Action Alternative, Treasury would not construct and operate a new CPF at BARC. The USDA would continue to own Treasury's proposed parcel. Treasury would continue operations in its existing, obsolete, owned and leased facilities. This would result in the continuation of inefficient, less secure, and higher risk operations that do not meet Treasury's current and future mission requirements.

While the No Action Alternative would not satisfy the purpose of and need for the Proposed Action, this alternative is retained to provide a comparative baseline against which to analyze the effects of the Proposed Action (i.e., Preferred Alternative), as required under the CEQ regulations (40 CFR 1502.14[d]). The No Action Alternative reflects the *status quo* and serves as a benchmark against which the effects of the Proposed Action can be evaluated.

ES.6.2 Preferred Alternative

Treasury proposes to construct and operate the Proposed Action on an approximately 104-acre, federally owned, unused parcel within BARC (i.e., Treasury's proposed parcel) as summarized in **Section ES.5** and detailed in this EIS.

In addition to the main CPF within Treasury's proposed parcel, Treasury would construct a new entrance road connecting its proposed parcel to Powder Mill Road. Treasury would also construct several minor modifications to Powder Mill Road in the vicinity of the intersection with the new entrance road (e.g., widening Powder Mill Road and installing a traffic control device). The proposed entrance road and Powder Mill Road modifications would require construction activities in an additional approximately 18-acre area, bringing the combined Project Site (i.e., Treasury's proposed parcel plus the areas of the entrance road and Powder Mill Road modifications) to a total of approximately 122 acres.

ES.7 Major Conclusions of the Impact Analysis

The EIS analyzes the potential impacts of the Preferred Alternative and No Action Alternative on the following 13 technical resource areas: land use; visual resources; air quality; noise; geology, topography, and soils; water resources; biological resources; cultural resources; traffic and transportation; utilities; socioeconomics and environmental justice (EJ); hazardous and toxic materials and waste (HTMW); and human health and safety. These impacts are summarized in **Table ES-1**. The Proposed Action has no potential to affect other resource areas not analyzed in this EIS.

Table ES-1: Summary of Potential Environmental Impacts on Evaluated Resource Areas[1]

Resource Area	No Action Alternative	Preferred Alternative
Land Use	Less-than-significant adverse impact on land use in Region of Influence (ROI) from existing buildings falling into disrepair; no impact to zoning.	*Construction:* Less-than-significant adverse impact on surrounding land uses from construction activities. *Operation:* Less-than-significant adverse impacts on land use and local planning objectives from the conversion of agricultural land to industrial land; no or negligible impact from new development in response to the proposed CPF; less-than-significant adverse impact to local zoning.
Visual Resources	Less-than-significant adverse impact to residences along Odell Road from deteriorating buildings.	*Construction:* Negligible adverse impacts for motorists; less-than-significant adverse impacts to residences along Odell Road due to views of construction activities; no impact to nighttime lighting levels. *Operation:* Less-than-significant adverse impacts to views from roadways; **potentially significant adverse impacts** to viewscapes from residences along Odell Road; negligible adverse impacts along Powder Mill Road from a new traffic control device; **potentially significant adverse impacts** on nighttime lighting levels for residences along Odell Road.
Air Quality	No impact on air quality.	*Construction:* Less-than-significant adverse impacts from criteria pollutant, fugitive dust, and greenhouse gas (GHG) emissions; negligible adverse impacts from hazardous air pollutant (HAP) emissions. *Operation:* Beneficial impacts from a reduction in volatile organic compound (VOC) emissions relative to the DC Facility; less-than-significant adverse impacts from non-VOC criteria pollutant emissions; no impact from fugitive dust emissions; less-than-significant adverse impacts from HAP and toxic air pollutant emissions; no perceptible change in regional impact from GHG emissions as new GHG emissions from proposed CPF would be offset by reduction of GHG emissions from DC Facility.
Noise	No impact on noise environment.	*Construction:* Less-than-significant adverse impacts on noise-sensitive receptors from construction activities. *Operation:* Negligible adverse impacts on noise levels from operational equipment and daytime vehicle and truck traffic; less-than-significant adverse impacts on sensitive receptors around the Project Site from nighttime truck traffic traveling through BARC; beneficial impacts to noise-sensitive receptors from the removal of rumble strips on Powder Mill Road.

Resource Area	No Action Alternative	Preferred Alternative
Geology, Topography, and Soils	No impact to geology, topography, or soils.	*Construction:* No or negligible adverse impact to soils from vegetation removal and compaction; no impact to geology or topography. *Operation:* No or negligible adverse impact from stormwater runoff; no significant impact to designated farmland soils; no impact to geology or topography.
Water Resources	No impact on water resources.	*Construction:* **Potentially significant adverse impact** on two intermittent streams from diversion and permanent fill; no or negligible adverse impacts on surface waters from erosion and sedimentation; no or negligible adverse impact on stormwater from ground disturbance; less-than-significant adverse impacts on wetlands from permanent fill; less-than-significant adverse impact on groundwater from excavation and potential contaminant mobilization; no adverse impact to the coastal zone. *Operation:* Less-than-significant adverse impact on surface water flow from wastewater discharge; no impact to on-site surface water from withdrawals or in-water work; no or negligible adverse impact to stormwater from changes in Project Site hydrology; no impact on wetlands; no impact to groundwater quality; negligible impact on groundwater supply; no adverse impact to the coastal zone.
Biological Resources	Minor beneficial impact on biological resources from reduced human activity at the Project Site.	*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 northern long-eared bat (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.
Cultural Resources	No impact on archaeological resources. **Significant adverse impact** on the BARC Historic District and its contributing resources due to building neglect and deterioration.	*Construction:* No impact to one potentially National Register of Historic Places-eligible archaeological site; less-than-significant adverse impacts on previously unknown archaeological sites if discovered during construction; less-than-significant adverse impact from the demolition of 22 contributing resources to the BARC Historic District. *Operation:* No impact on archaeological resources; **significant adverse impact** on the visual environment from the demolition of buildings and structures within the BARC Historic District and introduction and operation of the proposed CPF into the previously cohesive landscape.
Traffic and Transportation	Treasury would have no impact on traffic or transportation. However, regional background growth of the area would result in:	*Construction:* No impact on roadways in the regional ROI; less-than-significant adverse impact on traffic in the local ROI from construction worker commutes; less-than-significant adverse impact to local traffic from temporary closures on Powder Mill Road; no impact to parking or the pedestrian network; less-than-significant adverse impact

Resource Area	No Action Alternative	Preferred Alternative
	Less-than-significant adverse impacts on traffic and public transit and negligible impacts on pedestrian and bicycle facilities in the regional ROI. **Significant adverse impact** (continued from current conditions) on one intersection in the local ROI from failing level of service (LOS) and beneficial LOS impacts to two intersections. Less-than-significant adverse impact to intersections from longer queue lengths in ROI, except for **significant adverse impacts** (continued from current conditions) on two intersections; and beneficial impacts at one intersection.	to the bicycle network; negligible adverse impact to public transit from increased ridership. *Operation:* Negligible adverse impact on roadways in the regional ROI; no impact from increased truck traffic in the regional ROI; less-than-significant adverse impact from increased truck traffic in the local ROI; less-than-significant adverse impact to local traffic during congested periods; less-than-significant adverse impacts to intersections due to longer delays; **significant adverse impacts** to six intersections from a failing LOS; less-than-significant adverse impacts to intersections due to longer queue lengths; **significant adverse impacts** to one intersection from failing queue lengths; no impact to parking; minor adverse impact to the pedestrian and bicycle network; negligible adverse impacts to public transit from increased ridership.
Utilities	No impact on utilities.	*Construction:* No impact on utility supply or to non-BARC end users; negligible adverse impacts from temporary service disruptions of natural gas and water utilities; beneficial impact to BARC from improved utility efficiency. *Operation:* Negligible adverse impacts on utility demand and availability from increased usage.
Socioeconomics and Environmental Justice	No impact to the socioeconomic environment or EJ communities.	*Construction:* Beneficial impacts on the overall socioeconomic character of surrounding communities; no significant changes to socioeconomic conditions; no disproportionate impacts on EJ communities of concern from air quality, noise, and traffic and transportation. *Operation:* Beneficial impacts on communities from an increase in local revenues and spending; less-than-significant adverse impact on total employment and total earnings; no or negligible impacts on property values or labor force characteristics; less-than-significant adverse impacts on community services; less-than-significant disproportionate impacts on EJ communities from air emissions; no disproportionate impacts on EJ communities from noise; **significant adverse impacts** on EJ communities from increased traffic.
Hazardous and Toxic Materials and Waste	Less-than-significant adverse impact from existing buildings falling into disrepair.	*Construction:* Less-than-significant adverse impact from accidental release of HTMW; beneficial impact from removal and off-site disposal of regulated building materials. *Operation:* Less-than-significant adverse impacts from the potential accidental release from the use, handling, or storage of HTMW; less-than-significant adverse impact on the types and quantities of waste generated and Treasury's ability to manage these wastes.

Resource Area	No Action Alternative	Preferred Alternative
Human Health and Safety	Less-than-significant adverse impact from the continued use of the DC Facility and the inability to address safety and security risks, specifically for Treasury staff.	*Construction:* No or negligible adverse impacts on construction worker safety from normal construction activities; less-than-significant adverse impact from inherent construction risks and potential for accidents; no or negligible adverse impacts from intentionally destructive acts. *Operation:* Beneficial impact on health and safety for Treasury staff from more efficient production flows, a reduction in the potential for worker accidents, and improved passive and active security measures; less-than-significant adverse impact from the potential for intentionally destructive acts.

1. In the "No Action Alternative" and "Preferred Alternative" columns**, bold typeface** identifies potentially significant adverse impacts.

ES.8 Summary of Mitigation Measures

The Proposed Action includes the EPMs, RCMs, and BMPs. These measures are incorporated into the Proposed Action to reduce environmental effects through "mitigation by design." These measures are *not* considered mitigation measures in this EIS as they are proactive measures that would reduce effects by incorporation under the Preferred Alternative.

For resources that could still be adversely impacted even with implementation of the EPMs and RCMs, Treasury identified additional mitigation measures that could be implemented to further reduce these impacts, where feasible. Mitigation measures designed to avoid, minimize, rectify, reduce, or compensate for any potential significant impacts are identified below in accordance with 40 CFR 1508.20.

Land Use:

- Although not required, obtain a zoning reclassification of Treasury's proposed parcel from the Prince George's County Planning Department's Development Review Division from "Residential: to "Industrial."

Visual Resources:

- 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 within the ROI. Use fencing that resembles residential fencing and does not appear threatening to adjacent viewers.
- 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.
- Use a spectrum of light generally perceived as more natural, such as light-emitting diode (i.e., LED), metal halide, or halogen elements.
- Avoid high-intensity discharge (i.e., HID) or fluorescent lights (except compact fluorescent bulbs that screw into standard sockets) on the exterior of buildings.

Water Resources:

- As an alternative to diverting approximately 117 linear feet of the unnamed intermittent stream on-site, modify the limits of disturbance associated with proposed entrance road upgrades and the proposed vehicle entry control facility to avoid this stream.

- Conduct excavation activities at the Project Site when the groundwater table is seasonally lower (e.g., late summer or early fall) to minimize potential encounters with this resource.

Biological Resources:

- Apply voluntary conservation measures to reduce potential impacts to the NLEB, as identified in the NLEB Programmatic Biological Opinion. These measures may include avoiding tree removal activities within the NLEB pup season (June 1 to July 31) and/or the active season (April 1 to October 31).
- Construct and maintain the proposed stormwater management features to provide as much wildlife habitat value as possible.

Cultural Resources:

- Plant native and habitat-appropriate trees and vegetation on the Project Site that would limit views of the proposed CPF from portions of the BARC Historic District outside the Project Site (including from the 16 off-site, but on-BARC, contributing resources), as well as plant additional native and habitat-appropriate trees and vegetation along the northern and western boundary of the Project Site to obscure lines-of-site from these areas.
- Design the proposed CPF using architectural styles that minimize potential adverse impacts to the viewshed.

Traffic and Transportation:

- Design and implement mitigation measures for six intersections based on the ***Transportation Impact Study***.
- In consultation with local planning authorities, implement traffic-calming devices (e.g., speed bumps), reduce speed limits, and/or create pedestrian/bicycle lanes along roadways in the local ROI, such as Powder Mill Road. Rumble strips should be avoided, if feasible, as the existing rumble strips on Powder Mill Road have generated noise complaints from both the surrounding community and BARC employees.
- Incorporate pedestrian/bicycle amenities into the Preferred Alternative during the design process.
- Consult with the Washington Metropolitan Area Transit Authority regarding the opportunity to adjust Metrobus routes such that they serve the proposed CPF more effectively (e.g., installing 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.

Hazardous and Toxic Materials and Waste

- Characterize soils during excavation, particularly in the vicinity of Buildings 252 and 254, and route any contaminated soils for proper disposal in accordance with applicable regulations.

ES.9 Areas of Controversy

Based on scoping comments received, stakeholders are most concerned, in order of importance, about: traffic and transportation, land use, water resources, biological resources, Alternatives Considered/Proposed Action/Purpose and Need, hazardous and toxic materials and waste, cumulative effects, air quality and climate change, socioeconomics and EJ, public participation, visual resources and light pollution, utilities, noise, and cultural resources. Public scoping comments are summarized and addressed within each resource area discussion in this Draft EIS (DEIS).

ES.10 Agency Roles and Responsibilities

In accordance with TD 75-02, Treasury is the Lead Agency and decision-maker concerning this Proposed Action. Within this EIS, Treasury is used to refer to the US Department of the Treasury in its entirety, including the BEP, which is a bureau within Treasury.

The USDA is supporting the NEPA process by coordinating activities at BARC and sharing internal data relevant to the Proposed Action. Additionally, Treasury is working closely with relevant federal, state, and local agencies, as well as Native American Tribes, with purview over the Proposed Action throughout this NEPA process.

In addition, concurrent with this NEPA process, the US Army Corps of Engineers, Baltimore District (USACE) is acting as the federal contracting agency and is conducting site-specific studies to ensure compliance with other environmental laws, including Sections 401 and 404 of the federal Clean Water Act, Section 7 of the federal Endangered Species Act, and the Maryland Forest Conservation Act.

ES.11 Public Participation

Treasury has been engaging with local government leaders concerning the Proposed Action since 2017. Treasury published a Notice of Intent (NOI) to prepare this EIS in the *Federal Register* on November 15, 2019. Publication of the NOI initiated a 30-day scoping period during which Treasury solicited comments from the public; federal, state, and local agencies and organizations; and Native American Tribes. The public scoping period for this EIS was conducted from November 15 through December 15, 2019 and included a public scoping meeting held on December 3, 2019. Treasury prepared a Public Scoping Report that details Treasury's public outreach during this period and the comments received from stakeholders.

Treasury has made this DEIS available for public review and comment. Per 40 CFR 1506.10, the public comment period initiated with the US Environmental Protection Agency's publication of the Notice of Availability (NOA) of the DEIS in the *Federal Register* on November 6, 2020 and will conclude after 45 days on December 21, 2020.

Treasury published the DEIS NOA in local media and notified each entity on the Distribution List of the availability of the DEIS. These notifications included information on where the public could obtain or review a copy of the DEIS, provided information concerning the DEIS Virtual Public Meeting, identified multiple ways the public could submit comments, and identified that comments must be received or postmarked by December 21, 202 to be considered during preparation of the FEIS.

The DEIS is also available on the project's website at https://www.nab.usace.army.mil/home/bep-replacement-project. The public may provide comments on the DEIS directly through this website as well.

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Acronym List

ACHP	Advisory Council on Historic Preservation
ACM	Asbestos-containing material
ACS	American Community Survey
AOC	Area of Concern
APE	Area of Potential Effects
AQCR	Air Quality Control Region
ARS	Agricultural Research Service
BARC	Henry A. Wallace Beltsville Agricultural Research Center
BCC	Birds of Conservation Concern
BEP	Bureau of Engraving and Printing
bgs	below ground surface
BMP	Best Management Practice
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulation
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CO_{2e}	Carbon Dioxide equivalent
CPF	Currency Production Facility
CWA	Clean Water Act
CZMA	Coastal Zone Management Act
CZMP	Coastal Zone Management Program
dBA	A-weighted decibel
DC Facility	Washington, DC production facility
DEIS	Draft Environmental Impact Statement
DOE	Determination of Eligibility
DOT	Department of Transportation
ECOP	Environmental Condition of Property
EIS	Environmental Impact Statement
EISA	Energy Independence and Security Act
EJ	Environmental Justice
EO	Executive Order
EPM	Environmental Protection Measure
ESA	Endangered Species Act
ESA	Environmental Site Assessment
ESCP	Erosion and Sediment Control Plan
FCD	Federal Consistency Determination
FCP	Forest Conservation Plan
FDA	Food and Drug Administration
FEIS	Final Environmental Impact Statement

FEMA	Federal Emergency Management Agency
FPMO	Facility Project Management Office
FPPA	Farmland Protection Policy Act
FSD	Forest Stand Delineation
FY	Fiscal Year
GAO	Government Accountability Office
GHG	Greenhouse Gas
GI/LID	Green Infrastructure/Low Impact Development
gpd	gallons per day
GSA	General Services Administration
HAP	Hazardous Air Pollutant
HID	High-Intensity Discharge
HTMW	Hazardous and Toxic Materials and Waste
HVAC	Heating, Ventilation, and Cooling
I	Interstate
IPaC	Information for Planning and Consultation
ISC	Interagency Security Committee
LBP	Lead-based paint
LED	Light-Emitting Diode
LEED	Leadership in Energy and Environmental Design
LOD	Limits of Disturbance
LOS	Level of Service
M	million
MCL	Maximum Contaminant Level
MCPP	Mecoprop
MD	Maryland (State Route)
MDE	Maryland Department of the Environment
MDNR	Maryland Department of Natural Resources
Metro Area	Washington-Arlington-Alexandria Metropolitan Area
MFCA	Maryland Forest Conservation Act
MHT	Maryland Historical Trust
M-NCPPC	Maryland-National Capital Park and Planning Commission
MOA	Memorandum of Agreement
MS4	Municipal Separate Storm Sewer System
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NB	Northbound
NCPC	National Capital Planning Commission
NCR	National Capital Region
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NLEB	Northern long-eared bat
NOA	Notice of Availability

NOI	Notice of Intent
NO_x	Nitrous Oxides
NPDES	National Pollutant Elimination Discharge System
NPS	National Park Service
NRCS	Natural Resource Conservation Service
NRHP	National Register of Historic Places
O_3	Ozone
OEHS	Office of Environment, Health, and Safety
OMB	Office of Management and Budget
OSHA	Occupational Health and Safety Administration
PA	Programmatic Agreement
PBS	Public Building Service
PCB	Polychlorinated biphenyl
Pepco	Potomac Electric Power Company
PL	Public Law
PM	Particulate Matter
POV	Privately-owned vehicle
PPE	Personal Protective Equipment
PTE	Potential to Emit
RCM	Regulatory Compliance Measure
REC	Recognized Environmental Condition
RFK Stadium	Robert F. Kennedy Memorial Stadium
ROD	Record of Decision
ROI	Region of Influence
R-O-S	Reserved Open Space
SB	Southbound
SHPO	State Historic Preservation Office(r)
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
SOV	Single-Occupant Vehicle
TAP	Toxic Air Pollutant
TD	Treasury Directive
TMDL	Total Maximum Daily Load
Tpy	tons per year
Treasury	United States Department of the Treasury
UFC	Unified Facilities Criteria
ULSD	Ultra-low sulfur diesel
US	United States
USACE	United States Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service

UST	underground storage tank
UV	Ultraviolet
VOC	Volatile Organic Compound
WCF	Western Currency Facility
WHS	Wildlife Heritage Service
WIP	Watershed Implementation Plan
WMATA	Washington Metropolitan Area Transit Authority
WOUS	Waters of the United States
WQS	Water Quality Standards
WSSC	Washington Suburban Sanitary Commission
WWTP	Wastewater Treatment Plant

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1.0 Purpose of and Need for the Proposed Action

1.1 Introduction

The United States (US) Department of the Treasury (Treasury), Bureau of Engraving and Printing (BEP), is responsible for producing US currency notes (i.e., paper money). Within this document, Treasury is defined to include the US Department of the Treasury in its entirety, including the BEP.

Treasury proposes to construct and operate a new Currency Production Facility (CPF) (Proposed Action) 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. Although non-cash payment options have become more widely available, the number of US currency notes in circulation increased by 43 percent from 2008 to 2016, and the Federal Reserve predicts that the demand for cash will continue to rise over the next 10 years (GAO, 2018).

The NCR, shown in **Figure 1.2-1**, includes Washington, DC; Montgomery and Prince George's Counties, Maryland; Arlington, Fairfax, Loudoun, and Prince William Counties, Virginia; and all cities and towns included within the outer boundaries of these counties. As the seat of the federal government, the NCR is a strategic and necessary location for Treasury's operations. It is also home to Treasury's existing, uniquely skilled workforce and where most training programs are in place to certify its current and future workforce. Relocation of this workforce and training capability to outside of the NCR is cost-prohibitive and would impact Treasury's mission. The locations of Treasury's current facilities within the NCR are also shown in **Figure 1.2-1.**

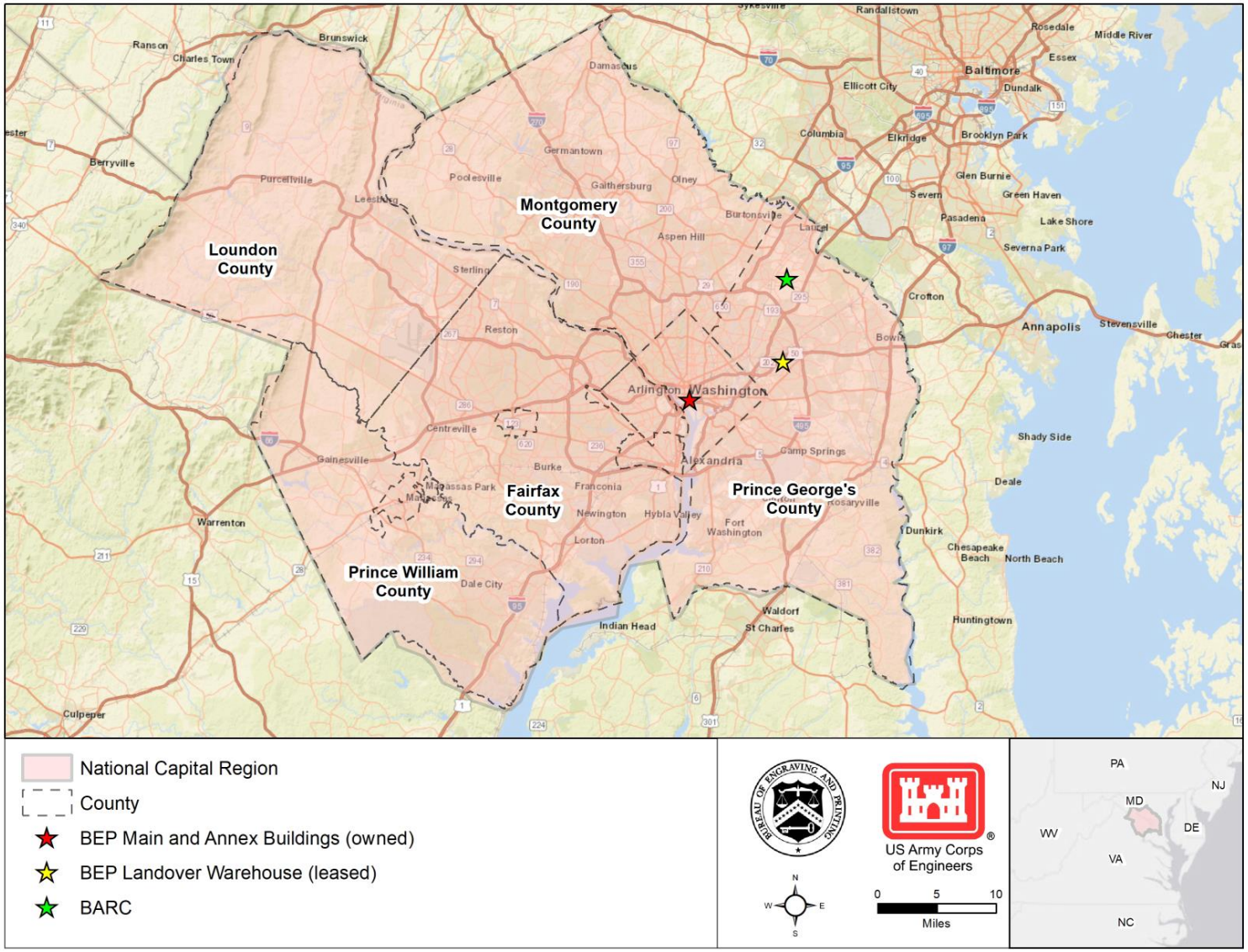
As required by the National Environmental Policy Act of 1969, as amended (NEPA; 42 US Code [USC] 4321 *et seq*.); the Council on Environmental Quality (CEQ) NEPA Regulations (40 Code of Federal Regulations [CFR] 1500-1508), and Treasury's NEPA Regulation (Treasury Directive [TD] 75-02), this Environmental Impact Statement (EIS) analyzes the potential environmental, cultural, and socioeconomic impacts of the Proposed Action and its considered alternatives.

This EIS evaluates potential effects to the natural and human environments within the Proposed Action's Region of Influence (ROI). This EIS informs decision-makers, regulatory agencies, and the public about this federal proposal and its potential environmental effects, prior to Treasury deciding whether to implement the Proposed Action and recommended measures that would mitigate potential adverse effects. Treasury will codify its decision in a Record of Decision (ROD) following the completion of the Final EIS (FEIS).

1.2 Digital Environmental Impact Statement

Pursuant to 40 CFR 1500.1(c), 40 CFR 1500.7(a)(3), Executive Orders (EO) 13766 and 13087, and recent CEQ memoranda and guidance (e.g., March 6, 2012), Treasury has streamlined this EIS while still satisfying the requirements of the regulations set forth in **Section 1.1**.

To streamline this EIS, improve understanding, and expedite the NEPA process, this written document is accompanied by a "Digital EIS," or digital display of relevant data which can be found on the project website. This Digital EIS is referenced within this written document, as appropriate; combined, these data presentations clearly convey relevant and required information to inform the public and decision-makers.



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454 **Figure 1.2-1: Regional Location Map**

To further render this document more concise, links are provided to online data sources to which the reader can refer for more information. In addition, appendix material has been placed on the project website instead of being included within this document.

Should the reader not have internet access, please contact the personnel listed on the **Abstract Page** of this EIS and accommodations will be made to provide you with hardcopies of relevant information requested.

1.3 Background

1.3.1 Treasury (Bureau of Engraving and Printing)

The BEP's mission includes manufacturing US currency notes; research, development, testing, and evaluation of counterfeit deterrents; and development of production automation technologies. The BEP's operations are also supported by administrative and security functions. The BEP's DC operations employ approximately 1,600 full-time staff.

Treasury currently operates two currency production facilities: (1) the DC Facility; and (2) a facility in Fort Worth, Texas, constructed in 1990. The DC Facility consists of two components: (1) the BEP Main Building, located at 301 14th Street Southwest; and (2) the BEP Annex Building, located at 300 14th Street Southwest. The Annex Building is used to store materials necessary to operate the Main Building of the DC Facility. The DC Facility is also supported by a BEP-leased warehouse in Landover, Maryland that receives truck shipments and stores additional materials (see **Figure 1.2-1**). These NCR facilities, however, are inefficient and collectively unable to provide Treasury with a modern currency production capability.

Treasury's Fort Worth production facility, the Western Currency Facility (WCF), began operating in the early 1990s to provide redundant, reliable currency production in the event of any disruption of operations at the DC Facility. Treasury intended the WCF to produce approximately 25 percent of US currency notes each fiscal year (FY); however, due mostly to operational deficiencies at the DC Facility, the average currency throughput at the WCF is now 60 percent or more of Treasury's total annual production.

1.3.2 Project History

The Proposed Action is the result of Treasury's more than 20-year planning process 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.

Treasury conducted several studies concerning the Proposed Action:

- Chief Financial Officer Performance and Accountability Report (BEP, 2017)
- Bureau of Engraving and Printing 2018-2022 Strategic Plan (BEP, 2018a)
- Treasury Strategic Plan 2018-2022 (Treasury, 2018b)
- Audit and evaluation reports (Treasury, 2019a)
- Summary of Capital Investments (Treasury, 2019b)
- Agency Financial Report (Treasury, 2019c)

These studies considered several possible scenarios to achieve these objectives, including renovation of the DC Facility and new construction within the NCR. Treasury concluded that construction of a new replacement CPF, as opposed to renovation of the DC Facility, was the most efficient and cost-effective option; new construction would best enable Treasury to achieve its mission while saving taxpayers money. In 2018, the Government Accountability Office (GAO) concurred with Treasury's finding that new construction was the best, most cost-effective solution (GAO, 2018).

1.4 Purpose and Need

The **purpose** of the Proposed Action is to construct and operate a new, up to 1 million square-foot CPF on a minimum 100-acre parcel of federally owned, available land within the NCR that has ready access to interstate roadways and commercial airports for transportation of US currency.

The Proposed Action would provide Treasury with a modern, scalable, sufficiently sized production facility within the NCR that meets Treasury's needs. Treasury's continued presence within the NCR would support and sustain its mission over the long term, resulting in more efficient, streamlined currency production. It would also allow Treasury to retain its current, uniquely skilled workforce, now and in the future. The facility would improve the health and safety of Treasury's personnel and allow Treasury to comply with federal facility security standards (ISC, 2016). Over the long term, the Proposed Action would reduce Treasury's federal footprint within the NCR by up to approximately 30 percent (in compliance with EO 13327, Office of Management and Budget [OMB] Memorandum 2015-01, and Presidential Memorandum DCPD201000483) by enabling Treasury to discontinue use of two of its three existing facilities in the NCR.

The **need** for the Proposed Action is to replace Treasury's obsolete DC Facility that is neither able to support modern currency production nor support Treasury's (and specifically the BEP's) current and future mission. The condition, configuration, and location of the DC Facility severely limit Treasury's ability to modernize the DC Facility through renovation (GAO, 2018), rendering modernization of existing facilities an untenable long-term solution. Within the DC Facility, production functions are spread across multiple floors and wings of the building, resulting in manufacturing processes that are inefficient and pose safety risks to staff. Fragmented storage across multiple facilities exacerbate these inefficient work production flows. Further, the location of the DC Facility does not allow Treasury to comply with modern physical security standards (e.g., security setback distances) in accordance with Interagency Security Committee (ISC) standards (ISC, 2016), and does not allow trucks easy access to the facility. The latter has resulted in Treasury leasing a warehouse in Landover, Maryland (see **Figure 1.2-1**) to receive truck shipments and store additional materials.

The Proposed Action would replace the operationally deficient DC facilities with a smaller, strategically located, state-of-the-art CPF within the NCR. Treasury's production operations would be co-located on a single floor in an appropriately sized, reconfigurable workspace with flexibility to respond to economic or technological changes. Treasury determined that a new CPF of up to 1 million square feet would be required to replace currency production at the DC Facility and modernize its operations (BEP, 2017).

1.5 National Environmental Policy Act Process

NEPA requires federal agencies to consider the potential environmental impacts of their proposed actions on the human environment. Preparation of an EIS is required for "major Federal actions significantly affecting the quality of the human environment" (42 USC 4332[C]). As a federal agency, Treasury must comply with NEPA, as well as the related regulations set forth in **Section 1.1**. The Proposed Action is, by definition, a major federal action requiring an EIS (40 CFR 1508.18).

An EIS identifies the potential environmental impacts of a proposed federal action prior to the proposing federal agency making any decision to implement the action. The EIS takes an interdisciplinary approach to project evaluation; documents objective consideration of reasonable alternatives; identifies mitigation measures to avoid or reduce adverse environmental impacts; and provides an avenue for public and agency participation in the decision-making process (40 CFR 1502.1). The EIS also documents and supports compliance with other applicable environmental statutes, regulations, and EOs.

Following the publication of a Notice of Intent (NOI) to prepare an EIS in the *Federal Register*, the proposing federal agency conducts a 30-day public scoping period (see **Section 1.10**). A Draft EIS (DEIS) is then prepared based, in part, on comments received during the scoping period. The DEIS is the first formal step

that documents the environmental analysis of the Proposed Action and is made available for a 45-day public comment period. A public comment meeting occurs within that 45-day period. Following the DEIS public comment period, the federal agency considers substantive comments and prepares the FEIS; the FEIS is then made available for a 30-day public review period.

Following completion of the FEIS review period and consideration of any additional comments received, the federal agency prepares a ROD. The ROD summarizes the Government's decision, identifies the Environmentally Preferable Alternative, selects the alternative that will be implemented, and summarizes the potential environmental impacts of that alternative. The ROD also formalizes any mitigation measures that the Government will implement.

The stakeholder Distribution List for this NEPA process is provided in **Section 8.0**. This list is updated throughout the NEPA process as additional stakeholders are identified. Members of the public have been invited to be included on this list at the public scoping meeting, as well as through the project website. Members of the public may be added to this list by request at any time during this NEPA process. For privacy reasons, however, members of the public are not included on the version of the Distribution List included in this DEIS.

1.6 Scope of the Environmental Impact Statement

The geographic scope of this EIS includes areas that could experience meaningful impacts from the Proposed Action, in terms of *context* and *intensity* (40 CFR 1508.27). This area is referred to as the Proposed Action's ROI and is specific to each resource area considered.

In accordance with NEPA and CEQ regulations, the EIS focuses on resource areas within the ROI potentially subject to significant effects. Based on the results of internal and external scoping conducted as part of this NEPA process, and as further detailed in the Public Scoping Report, the following resource areas are evaluated in this EIS: land use; visual resources; air quality; noise; geology, topography, and soils; water resources; biological resources; cultural resources; traffic and transportation; utilities; socioeconomics and environmental justice (EJ); hazardous and toxic materials and waste (HTMW); and human health and safety.

This EIS addresses the potential effects of the Proposed Action and its considered alternatives on each of these resource areas. **Section 3.0** of the EIS presents information on the existing condition of each resource area within its appropriate ROI, as well as the environmental impact analysis and recommended mitigation measures. Cumulative effects are described in **Section 4.0**.

Resource areas eliminated from further consideration, as well as the rationale for eliminating those resource areas, are presented in **Section 3.1**. These resource areas include air space, floodplains, mineral/energy resources, and protection of children.

1.7 Agency Roles and Responsibilities

In accordance with TD 75-02, Treasury is the Lead Agency and decision-maker concerning this Proposed Action. The US Army Corps of Engineers, Baltimore District (USACE) is the federal contracting agency for this EIS. Treasury is working closely with relevant federal, state, and local agencies, as well as Native American Tribes, with purview over the Proposed Action throughout this NEPA process. Copies of the letters sent to each entity invited to participate in this NEPA process and any responses received are included in the Public Scoping Report.

This EIS also serves as documentation of Treasury's compliance with Section 106 of the National Historic Preservation Act (NHPA) (16 USC 470). Section 106 of the NHPA requires that federal agencies consider the potential effects of their undertakings on historic properties and afford the Advisory Council on Historic

Preservation (ACHP) an opportunity to comment on the undertaking. Additionally, consultation with the appropriate State Historic Preservation Office (SHPO), in this case the Maryland Historical Trust (MHT), and federally recognized Native American Tribes (see **Section 1.9**) affiliated with the ROI is conducted through the NEPA process. Therefore, this EIS will be used to comply with the NHPA.

Further, concurrent with this NEPA process, USACE is conducting site-specific studies to ensure compliance with other environmental laws, including Sections 401 and 404 of the federal Clean Water Act (CWA), Section 7 of the federal Endangered Species Act (ESA), and the Maryland Forest Conservation Act (MFCA). Specifically, USACE is conducting the following studies related to the Proposed Action:

- Waters of the US (WOUS) survey, including wetlands
- MFCA Forest Stand Delineation
- Northern Long-Eared Bat (NLEB) Survey
- Phase I and II Archaeological Investigations
- Architectural Evaluation, including a Determination of Eligibility (DOE) for historic properties and structures
- Phase I and II Environmental Baseline Surveys
- Topographic Survey
- Geotechnical Investigation
- Transportation Impact Study

Information from these analyses and associated review and approval processes is presented in this EIS.

1.8 Decision to be Made

This EIS informs decision-makers and the public of the potential environmental effects of the Proposed Action and its considered alternatives prior to making a federal decision to move forward with any alternative. As identified in **Section 1.5**, the public is able to provide input on the Proposed Action, alternatives, relevant issues, and resource areas of concern at certain periods during the NEPA process, enabling Treasury to make a fully informed decision. This EIS also identifies measures that Treasury could implement to minimize adverse environmental effects as required by NEPA, CEQ regulations, and TD 75-02.

During this NEPA process, Treasury is responsible for deciding which Alternative(s) to consider for full analysis within this EIS, and which Alternative, if any, may be used to implement the Proposed Action. As part of deciding whether to implement the Proposed Action, Treasury will decide which Alternative is the Environmentally Preferable Alternative, which Alternative may be implemented (i.e., the Selected Alternative), and which mitigation measures to implement. These decisions will be made based on Treasury's thorough analysis completed in this EIS and will be documented in the ROD.

1.9 Consultation with Federally Recognized Native American Tribes

Treasury is consulting with federally recognized Native American Tribes determined to have ancestral ties to the ROI pursuant to 40 CFR 1501.7(a)(1); NEPA; and the Native American Graves Protection and Repatriation Act (NAGPRA). Treasury invited Tribes to participate in the NEPA and NHPA Section 106 processes as Sovereign Nations per EO 13175 (*Consultation and Coordination with Indian Tribal Governments*). Treasury identified seven federally recognized Native American Tribes: the Delaware Nation, Oklahoma; Delaware Tribe of Indians; Seneca-Cayuga Nation, New York; Oneida Nation of New

York; Onondaga Nation, New York; St. Regis Mohawk Tribe, New York (formerly the St. Regis Band of Mohawk Indians of New York); and Tuscarora Nation of New York.

Treasury sent letters to these Tribes to initiate consultation in November 2019 and January 2020, and provided Tribes with the Draft Phase I Archaeological Surveys in January 2020 and September 2020. The Delaware Nation, Oklahoma responded on November 11, 2019 with a recommendation to conduct a cultural resources survey for the proposed undertaking, and the Oneida Nation of New York responded on September 28, 2020 with a statement of no concern or comment. No other Tribes have responded to date. Treasury will continue to consult with these Tribes throughout the NEPA and NHPA Section 106 processes. A record of related written communication with Tribes is included in ***Cultural Resources Technical Memorandum***.

1.10 Public Participation

Treasury invites public participation in the NEPA process. Consideration of the views and information of all interested persons promotes open communication, provides additional information and public concerns to decision-makers, and enables better decision-making. All agencies, organizations, and members of the public that have a potential interest in the Proposed Action are invited to participate in the decision-making process.

Throughout this process, the public may obtain information on the status and progress of the Proposed Action and EIS from the project website.

During the DEIS and FEIS public review periods, written comments may be emailed to USACE – Baltimore District at BEP-EIS@usace.army.mil or mailed to ATTN: BEP Project EIS, United States Army Corps of Engineers, Baltimore District Planning Division, 2 Hopkins Plaza, 10th Floor, Baltimore, Maryland 21201. Comments may also be posted to the project website directly at https://www.nab.usace.army.mil/home/bep-replacement-project/. Treasury will only respond to public comments during specified, formal public comment and review periods.

1.10.1 Public Scoping Process

Treasury has been engaging with local government leaders concerning the Proposed Action since 2017. Treasury published an NOI to prepare this EIS in the *Federal Register* on November 15, 2019. Publication of the NOI initiated a 30-day scoping period during which Treasury solicited comments from the public and federal, state, and local agencies and organizations, as well as Native American Tribes. Accordingly, the public scoping period for this EIS was conducted from November 15 through December 15, 2019. Treasury prepared a Public Scoping Report that details Treasury's public outreach during this period and the comments received from stakeholders.

In addition to publishing the NOI in the *Federal Register*, Treasury published an advertisement announcing the initiation of the NEPA process and the public scoping meeting in the following newspapers:

- *Greenbelt News Review*, on November 14, 2019
- *Washington Post*, on November 15, 2019
- *Prince George's Sentinel*, on November 21, 2019
- *Beltsville News*, on November 23, 2019

Finally, Treasury emailed or mailed a letter announcing the beginning of the NEPA scoping process, the public scoping meeting, and how to submit comments on November 14, 2019 to all stakeholders on the Distribution List. The public scoping meeting was held on December 3, 2019. For more information regarding this meeting, please refer to the Public Scoping Report.

1.10.2 Public Scoping Comments

Treasury received 415 distinct comments during the public scoping period. Based on scoping comments received, stakeholders are most concerned, in order of importance, about: *Traffic and Transportation, Land Use, Water Resources, Biological Resources, Alternatives Considered/Proposed Action/Purpose and Need, Hazardous and Toxic Substances, Cumulative Effects, Air Quality and Climate Change, Socioeconomics and Environmental Justice, Public Participation, Visual Resources and Light Pollution, Utilities, Noise, and Cultural Resources*. For further information, please refer to the Public Scoping Report.

Public scoping comments are summarized and addressed within each resource area discussion in **Section 3.0** of this DEIS.

1.10.3 Draft EIS Public Review Process

Treasury has made this DEIS available for public review and comment. Per 40 CFR 1506.10, the public comment period initiated with the US Environmental Protection Agency's (USEPA) publication of the Notice of Availability (NOA) of the DEIS in the *Federal Register* on November 6, 2020 and will conclude after 45 days on December 21, 2020.

Treasury published the NOA of the DEIS in the same manner as it published the NOI (see **Section 1.10.1**). These notifications included information on where the public could obtain or review a copy of the DEIS, provided information concerning the DEIS Virtual Public Meeting, identified multiple ways about how comments could be submitted, and identified that comments must be received or postmarked by December 21, 2020 to be considered during preparation of the FEIS. The DEIS is also available on the project website. Public comments may be made directly through this website as well.

2.0 Description of Proposed Action and Alternatives

2.1 Introduction

The following sections describe the Proposed Action, Treasury's screening criteria and process, and alternatives dismissed and retained. The No Action Alternative, as required by 40 CFR 1502.14(d), is described.

2.2 Description of the Proposed Action

The Proposed Action includes construction and operation of an up to 1 million square-foot CPF within the NCR. The CPF would range in height from approximately 40 to 50 feet above ground level. The Proposed Action would be implemented over an approximately nine-year period in the following general sequence, which could vary based on contractual requirements, after completion of the NEPA analysis and signing of the ROD (i.e., anticipated in approximately July 2021). This sequence is discussed further in the subsections that follow and includes the following primary phases and approximate timeframes:

1. Complete the 100 percent design to meet operational, security, and safety standards, and obtain required regulatory permits (2021).
2. Construct the facility (2022-2025).
3. Transition personnel and production operations to the completed facility (2025-2029).

The duration of the Proposed Action includes design, construction, equipment installation, acceptance testing to support full operations, and the sequenced transition of personnel into the completed facility (short-term). It also includes the operational life of the Proposed Action, anticipated to be 50 years (long-term).

2.2.1 Design

The new CPF would be equipped with state-of-the-art technology to automate and track currency manufacturing and operate with greater efficiency than the current DC Facility. Work production flows would be flexible and reconfigurable to avoid disruptions of work in progress or respond to changing priorities, including as staff are transitioned to the new facility. The Proposed Action would also include ample, strategically located storage and administrative space to support currency manufacturing. For comparative purposes, Treasury's WCF in Fort Worth, Texas, constructed in 1990, is shown in **Figure 2.2-1**. Please note this image is provided to enhance understanding; however, this facility's appearance and the Proposed Action's appearance would be different (e.g., the Proposed Action would maintain a large forest buffer).

The new CPF would include office, manufacturing, and warehouse space constructed in accordance with the Department of Defense Unified Facilities Criteria (UFC) standards. The office area portion of the CPF, as well as the building envelope, would consist of two or three stories equipped with standard utility systems. Outdoor views and daylight would be available to at least 90 percent of the office floors.

Figure 2.2-1: Western Currency Facility in Fort Worth, Texas

The manufacturing floor would be designed to support light and heavy manufacturing loads, as appropriate. Manufacturing areas would be situated on a single, ground floor by machine type, configured to reduce equipment movement constraints, and organized by function (i.e., support functions would link to specific operational functions). This portion of the CPF would be designed to provide flexibility in the manufacturing process as US currency demand fluctuates and new technologies are researched, tested, and introduced over time. Space would be set aside in each production line for this purpose and building access points and roads would be designed to align with manufacturing areas to permit the movement of production equipment or work in progress. Noise abatement devices would also be incorporated into the design to absorb and reduce the movement of sound throughout the manufacturing areas and reduce or prevent exterior noise.

The new CPF would provide a wide range of storage space to support Treasury's mission. Warehouse areas would be designed and located based upon material types and usage, as well as other factors such as security or environmental considerations. For example, some currency papers and inks require storage in a secure environment and some manufacturing processes result in waste material with specific storage requirements.

Other infrastructure that Treasury would incorporate into the Proposed Action includes, but is not limited to, the following:

- Power substation for distributing power to the facility
- Central chilled water and hot water plant
- Central compressed air and vacuum pump plant
- Wastewater treatment facility to collect and recycle wiping solution and potentially plating line water treatment
- Fire suppression water storage and booster pump house (if needed)
- Bulk chemical storage area

- Hazardous material storage and flammable material storage areas
- Site curbs/containment basin(s) to contain chemical spills
- Centralized paper trim collection system(s)
- Exhaust and air quality abatement systems

The Proposed Action would include a multi-component security system, employing both active (e.g., surveillance cameras and notification systems) and passive (e.g., well-defined and controlled entry and exit areas) deterrents. New security technologies to manage vehicle and staff access and monitor the site and facility would be installed. Natural barriers, such as trees and topography, retained on the Project Site would augment physical barriers and provide additional levels of protection. The design of the Proposed Action would meet all applicable federal facility security requirements, including site setbacks for security structures, vehicle inspection areas, parking areas, maintenance and storage sheds, and fencing. Field-of-view security requirements would be met.

Utility systems would include electricity, water, sanitary sewer, and fiber optic systems and services sufficient to support CPF operations. Humidification would be conducted in all printing areas, vaults, paper storage areas, and circulation areas where work in progress would be located. Additionally, dedicated exhaust systems would be installed throughout the CPF, as appropriate.

With a goal of achieving a Leadership in Energy and Environmental Design (LEED) rating of Silver, the building and building systems would be designed in accordance with sound engineering practices and with lifecycle energy cost and conservation considerations. For example, the following sustainable features would be evaluated for incorporation into the CPF's design:

- High efficiency chilled water plant and hot water plant
- Heating plant boilers that use waste heat to preheat incoming water
- Use of heat recovery chillers to offset heating load using waste heat from process cooling
- Solar thermal domestic water heating and high efficiency, natural gas-fired, condensing style water heaters
- Demand-controlled ventilation and indoor air quality monitoring
- Energy-efficient humidification and lighting systems
- Wiping solution recycling system
- Low-flow plumbing/piping fixtures
- Rainwater harvesting system for reuse
- Rooftop solar panels

Overall, high efficiency equipment and systems for heating and cooling, humidification, and lighting would reduce the amount of energy required to operate the CPF. The CPF design would also include a building automation system to manage and optimize the CPF's electrical and mechanical systems.

2.2.2 Construction

Construction of the Proposed Action would begin in 2021 or 2022 with site preparation activities such as building demolition and removal of existing infrastructure (e.g., existing roads, utilities), as required. This would be followed by clearing, grading, leveling, and similar earthwork, avoiding important environmental resources to the extent feasible. Next, site components, including the CPF, subsurface utility infrastructure,

roadways, and parking areas would be constructed in accordance with the final design. Finally, the CPF and associated facilities would be completed and the grounds would be landscaped.

2.2.3 Operation

Once the CPF is constructed, Treasury would gradually transition personnel and operations from the DC Facility in phases from approximately 2025 to 2029. The transport of large pieces of equipment and entire production processes would occur in phases to minimize potential disruptions to Treasury's production and distribution operations. The sequence and nature of this transition is not currently known. When completed, however, approximately 1,600 employees would work at the new CPF in three shifts; most employees (approximately 1,200) would work the day shift, anticipated to be from 6:30 a.m. to 3:30 p.m. on Monday through Friday; the remaining 400 employees would likely work from either 2:30 p.m. to 11:30 p.m. or 11:00 p.m. to 7:00 a.m. on Monday through Friday in approximately equal proportions. Overtime work on weekends could also occur when necessary.

Currency manufacturing at the DC Facility would be phased out. The DC Facility would likely be renovated to function as the BEP's administrative headquarters and support various other Treasury functions; however, this is not considered part of the Proposed Action and would be analyzed under separate NEPA documentation. Treasury would likely transfer the Annex Building to the General Services Administration (GSA) as surplus federal property, and discontinue its warehouse lease in Landover, Maryland. However, the plans for these facilities have not been finalized.

2.2.4 Environmental Impact Reduction

In support of this EIS, USACE is conducting site-specific studies in accordance with federal and state requirements (see **Section 1.7**). The results of these studies will inform the design process and allow Treasury to avoid important and sensitive environmental resources on the Project Site to the maximum extent feasible. This would include establishment of setbacks and buffers and integration of important environmental features into the Proposed Action, including retained forest areas and wetlands. Data from these studies and descriptions of associated regulatory (i.e., permitting) processes are presented for relevant resource areas throughout **Section 3.0**.

Treasury would incorporate Environmental Protection Measures (EPMs), Regulatory Compliance Measures (RCMs), and Best Management Practices (BMPs) into the Proposed Action to proactively minimize environmental impacts and comply with applicable environmental regulatory requirements. As used in this EIS, these terms are defined as follows:

- **EPMs** are non-regulatory measures that Treasury would conduct in order to reduce potential adverse environmental impacts (e.g., conducting construction activities outside the migratory bird breeding season).
- **RCMs** are compliance measures that Treasury is required to conduct in accordance with applicable laws and regulations (e.g., consultation with federal agencies under the ESA, NHPA, etc.).
- **BMPs** are practices specifically identified by regulatory agencies as such in regulations or permits (e.g., air quality, noise).

These measures would be implemented as required components of the Proposed Action to provide "mitigation by design." These are not mitigation measures; mitigation measures are recommended to further reduce impacts, but are not required or incorporated into the Proposed Action (see **Section 5.5**). EPMs, RCMs, and BMPs are presented in **Table 2.2-1**.

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Table 2.2-1: EPMs, RCMs, and BMPs Incorporated into the Proposed Action

Resource Area	Construction	Operation
Land Use	• Execute the land transfer of Treasury's proposed parcel from the US Department of Agriculture (USDA) to Treasury. • Route construction access from Powder Mill Road north onto Poultry Road and avoid transporting construction materials or operational traffic along Odell Road to avoid impacts to residential land uses along this road. • Install privacy fencing along Odell Road and around the proposed entrance road during construction to minimize views of construction activities.	• Maintain professionally landscaped grounds around the proposed CPF and the forested border between the facility and Odell Road during operation.
Visual Resources	• Install privacy fencing along Odell Road and the proposed entrance road during construction to further minimize views of construction activities.	• Design the proposed CPF in a manner consistent with Treasury's project-specific Memorandum of Agreement (MOA) or Programmatic Agreement (PA) for cultural resources, reducing potential adverse visual effects, if feasible (e.g., by selecting materials and colors that blend with the existing visual landscape). • Retain and enhance existing landscape buffers (i.e., topography and vegetation) around the periphery of Treasury's proposed parcel to obscure it from adjacent areas and maintain visual resources for off-site locations.

Resource Area	Construction	Operation
Air Quality	• Comply with the Maryland Department of the Environment's (MDE's) vehicle idling requirements by turning off equipment and vehicles when not in use. • Use ultra-low sulfur diesel (ULSD), propane, or natural gas as a fuel source in equipment and vehicles to the extent possible to minimize sulfur dioxide (SO_2) emissions. • Cover beds of dump trucks while they are in transport to minimize fugitive dust emissions. • Cover unpaved roads with gravel to minimize fugitive dust emissions. • Locate equipment and staging zones as far as practicable from sensitive receptors (e.g., on the southern portion of the Project Site). • Obtain the appropriate permits for CPF construction and operation from the MDE.	• Properly maintain fuel-burning equipment by monitoring and maintaining the equipment according to manufacturer specifications. • Implement current and planned projects for air emission reductions as practicable, such as replacing nickel plate electroforming with laser engraving, chromium electroplating with an emission-free physical vapor deposition plating process, using ultraviolet (UV)-cured inks which have a low Volatile Organic Compound (VOC) content, using electricity from renewable energy sources, and continuing to conduct comprehensive air emission and greenhouse gas (GHG) analyses. • Maintain and adhere to the appropriate operating permits from the MDE for the proposed CPF.
Noise	• Prepare and submit a noise-suppression plan to Prince George's County, before construction, that identifies the most appropriate and reasonably available noise-suppression equipment, materials, and methods (e.g., use of temporary sound barriers or acoustic curtains) to reduce noise levels during construction. • Require construction workers to wear appropriate protective gear during loud activities in accordance with Occupational Safety and Health Administration (OSHA) safety requirements to prevent hearing damage or other adverse impacts. • Require construction-related heavy trucks to access the Project Site through the Beltsville Agricultural Research Center (BARC) to minimize impacts to off-site noise-sensitive receptors.	• Require operation-related heavy trucks to access the Project Site through BARC to minimize impacts to off-site noise-sensitive receptors. • Install noise-generating support equipment (e.g., emergency generators and heating, ventilation, and air conditioning [HVAC] units) inside the proposed CPF or within adjacent enclosures; operate such equipment in accordance with the Prince George's County Noise Ordinance. • Fully enclose currency production equipment within the proposed CPF in a manner that reduces or avoids exterior noise.

Resource Area	Construction	Operation
Geology, Topography, and Soils	• Obtain a *Maryland General Permit for Stormwater Associated with Construction Activity* to manage soil erosion, sedimentation, and compaction associated with construction of the Proposed Action. Treasury would prepare a state-approved Erosion and Sediment Control Plan (ESCP) and submit an NOI to meet the requirements of the federal National Pollutant Discharge Elimination System (NPDES) program. • Incorporate stormwater design features and management practices, such as detention or retention ponds and green infrastructure/low-impact development (GI/LID) techniques into the Proposed Action that would minimize the potential for soil erosion and sediment transport during operation. • Adhere to the site-specific ESCP and implement BMPs in accordance with the Manual for Erosion and Sediment Control in Maryland (MDE, 2011).	• Revegetate temporarily disturbed areas as soon as possible to minimize erosion and sedimentation. • Maintain stormwater management features throughout the life of the project to ensure long-term functionality to original design standards.
Water Resources	• Incorporate a suitable diversion of the unnamed intermittent stream on-site such that it does not overlap the project limits of disturbance (LOD). This diversion would need to maintain the existing stream flow and hydrologic function of the stream to the extent practicable. • Obtain and adhere to appropriate permits (or letters of exemption) from the MDE and USACE to comply with Sections 404/401 of the CWA and comply with all BMPs established throughout this consultation process. • Obtain a *Maryland General Permit for Stormwater Associated with Construction Activity* to manage stormwater associated with construction of the Proposed Action. Treasury would prepare and adhere to a state-approved ESCP and submit an NOI to meet the requirements of the federal NPDES program. Treasury would also manage stormwater discharges and maintain water quality through compliance with existing total maximum daily loads (TMDLs). • Incorporate, as required by Section 438 of the Energy Independence and Security Act (EISA), GI/LID measures to maintain the pre-development hydrology of the Project Site to	• Obtain and adhere to the requirements of *a Maryland General Permit for Discharges of Stormwater Associated with Industrial Activity* to regulate the quantity and quality of stormwater runoff generated by operation of the proposed CPF. Alternatively, in coordination with the USDA, Treasury may amend the NPDES Municipal Separate Storm Sewer System (MS4) Phase II General Permit that currently covers BARC operations to include the proposed CPF. • Maintain and continue to comply with the existing discharge permit issued by the MDE for the BARC East Wastewater Treatment Plant (WWTP).

Resource Area	Construction	Operation
	the maximum extent technically feasible during operation, minimizing any change in the rate, volume, and temperature of stormwater discharging to off-site areas. • Incorporate, as required by EO 13508, stormwater control BMPs to manage and reduce pollution flowing from the Project Site into the Chesapeake Bay and its tributaries. • Submit a Federal Consistency Determination (FCD) to the Maryland Department of Natural Resources (MDNR) for review and concurrence. • Demarcate the construction LOD in the field to prevent encroachment or unpermitted surface water resources. • Establish construction staging areas at least 100 feet away from surface water resources. • When excavating below the groundwater table, incorporate measures that minimize potential impacts to local shallow groundwater, including dewatering these areas, preventing discharge of any water potentially contaminated during the construction/demolition process, and restoring sites to natural subsurface conditions prior to construction of the proposed CPF.	
Biological Resources	• Implement pre-construction activities, such as pruning and/or fertilizing, as specified in the Forest Conservation Plan (FCP) to ensure retained specimen tree health. • Limit or avoid 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. • Coordinate with owner(s) of bird nest boxes to relocate nest boxes during the non-nesting period for the bluebird and tree swallow prior to construction.	• Implement the FCP/Planting Plan as required by the MFCA. Forest areas identified as retention, reforestation, or afforestation areas in the FCP would be placed under a long-term protection agreement (e.g., a conservation easement or similar framework). • Comply with the applicable provisions of the CWA, Section 438 of the EISA, and EO 13508 to control and manage erosion and minimize discharge, such as the preparation of a site-specific ESCP and incorporation of GI/LID design features and techniques. • Revegetate disturbed areas with native species. • Incorporate noise and light abatement or shielding features into the design of the proposed CPF as identified in other resource areas.

Resource Area	Construction	Operation
		• Using the LEED framework, evaluate the need for design measures to reduce the likelihood of bird mortality from window strikes, such as patterns on glass windows and use of non-reflective windows.
Cultural Resources	• Continue to consult with the MHT and other interested (consulting) parties, including federally recognized Tribes, throughout the Proposed Action planning process. • Execute and implement a project-specific MOA or PA, pursuant to 36 CFR 800.6(c) and 800.14(b)(1). The agreement document would be implemented in accordance with stipulations in order to include the effect of the undertaking on historic properties. This would include negotiation between the signatories on measures to avoid, minimize, or mitigate the adverse effects on historic properties throughout the design and construction of the proposed CPF. Pursuant to 36 CFR 800.6(a)(1), Treasury would invite the ACHP to participate in the development of the MOA or PA. • In the event of an unanticipated discovery of an archaeological resource during construction, suspend ground-disturbing activities in the vicinity of the resource and have a cultural resources specialist meeting the Secretary of the Interior's *Professional Qualification Standards* (36 CFR 61) determine if an Unanticipated Discovery Plan should be developed and implemented. Treasury would consult with the MHT and other interested parties, including federally recognized Tribes, regarding the inadvertently discovered resource(s) and comply with Section 106 of the NHPA and other applicable regulations.	• None.

Resource Area	Construction	Operation
Traffic and Transportation	• Establish construction activity hours such that construction workers and trucks would not travel during the peak hours of the local ROI (i.e., 7:45 to 8:45 a.m. and 5:00 to 6:00 p.m.). • Implement an agreement with the USDA to enable construction workers to use the USDA shuttle from the Greenbelt Metrorail Station to the Project Site, potentially including expanded shuttle service. • Restrict trucks from traveling on roads proximal to residences (e.g., Odell Road) to the extent possible; construction access to the Project Site should be limited to Poultry Road to the south of the Project Site. • Consult with local planning authorities regarding all proposed construction activities within the Powder Mill Road right-of-way.	• Require trucks to follow existing truck restrictions on regional and local roadways, such as the restriction of commercial trucks on portions of the Baltimore-Washington Parkway. 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. • Schedule truck arrivals and departures during daytime hours, but outside of the typical peak hours (i.e., 7:45 to 8:45 a.m. and 5:00 to 6:00 p.m.) in the local ROI, to the extent possible. • Restrict trucks from traveling on roads proximal to residences (e.g., Odell Road) to the extent possible; operational access to the Project Site would be limited to Powder Mill Road, south of the Project Site. Odell Road would only be used as an emergency exit from the proposed CPF. • Implement an agreement with the USDA to enable CPF employees to use the USDA shuttle from the Greenbelt Metrorail Station to Treasury's proposed parcel, potentially including expanded shuttle service.
Utilities	• Minimize utility disruption to end users by implementing efficient construction sequencing of utility modifications. • Provide advance notice to potentially affected end users of any anticipated disruption to allow for adequate planning. • Obtain all required permits before any proposed utility work commences and adhere to permit conditions. • Consult with utility providers throughout the design process regarding utility supply and efficient infrastructure options to support the Proposed Action.	• Achieve a Silver LEED rating to maximize resource efficiency and minimize utility demands. • Incorporate GI/LID design features in accordance with Section 438 of the EISA to maintain the pre-project hydrology of the Project Site to the extent practicable, and incorporate stormwater control best management practices in accordance with EO 13508 to minimize the strain on stormwater infrastructure.
Socioeconomics and Environmental Justice	• Implement the impact-reduction measures described for Air Quality, Noise, Visual Resources, and Traffic and Transportation.	• Implement the impact-reduction measures described for Air Quality, Noise, Visual Resources, and Traffic and Transportation.

Resource Area	Construction	Operation
Hazardous and Toxic Materials and Waste	*Pre-Construction* • Survey buildings slated for demolition to determine presence of regulated building materials that would need to be removed or encapsulated prior to demolition activities. • Transport removed regulated building materials and contaminated soil to off-site, federally approved waste management facilities. • Contract USEPA- and Maryland-licensed workers to conduct all survey and removal actions in accordance with applicable USEPA, MDE, and Department of Transportation (DOT) regulations. *Construction* • Implement construction BMPs to minimize impacts from accidental releases or potential discharge of construction materials and equipment. • Implement spill and leak prevention and response procedures, including maintaining a spill kit at the Project Site. • Report releases of regulated quantities of petroleum-based fluids to Treasury and the MDE; clean up releases according to applicable state regulatory requirements. • In the event of an unexpected discovery of a HTMW concern, cease operations in that area until further characterization is performed and the HTMW is properly managed.	• Store and secure hazardous materials in appropriate, sealed, and labeled containers in marked cabinets, lockers, tanks, and storage areas. • Incorporate hazardous material and waste reduction initiatives in accordance with the BEP's "Reducing Environmental Impacts" memorandum.

Resource Area	Construction	Operation
Human Health and Safety	• Ensure that first aid-qualified personnel and appropriate supervisory personnel are always present on the Project Site during construction. • Conduct regular safety meetings during construction activities to identify potential hazards. • Prepare and adhere to a site- and project-specific health and safety plan identifying the location and travel routes to the nearest hospital/emergency room and urgent care center during construction. • Require all supervisory personnel to review and familiarize themselves with the project health and safety plan. This plan would be maintained on-site throughout construction. • Require supervisory personnel, including qualified safety professionals, to be present on-site each workday to monitor work protocol, worker safety, and the potential for accidents during construction. • Place cleanup kits strategically throughout the Project Site for use in the event of an accidental spill or release, particularly of a hazardous material such as fuel, to ensure that spilled materials and their potential impacts are contained to a small area and do not have the opportunity to migrate off-site.	• Prepare and adhere to a site- and project-specific health and safety plan identifying the location and travel routes to the nearest hospital/emergency room and urgent care center during operation. • Require all supervisory personnel to review and familiarize themselves with the project health and safety plan. This plan would be maintained at the proposed CPF throughout operation. • Require supervisory personnel, including qualified safety professionals, to be present at the proposed CPF each workday to monitor work protocol, worker safety, and the potential for accidents during operation. • Continue to provide applicable health and safety training to Treasury personnel, particularly personnel using and handling hazardous materials and hazardous waste. • Continue to review and assess potential security threats and adjust security measures accordingly.
Cumulative Effects	• Implement the impact-reduction measures identified for each resource area to the extent practicable; no specific impact-reduction measures are proposed for cumulative effects. • Coordinate with state regulators, local regulators, and construction contractors to alleviate the potential for future cumulative conflicts during construction.	• Implement the impact-reduction measures identified for each resource area to the extent practicable; no specific impact-reduction measures are proposed for cumulative effects. • Coordinate with state regulators and local regulators to alleviate the potential for future cumulative conflicts during operation.

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2.3 Alternatives Screening Process

NEPA requires all reasonable alternatives to be explored and evaluated objectively (40 CFR 1500.2[e]). Alternatives not found to be reasonable do not need to be evaluated; however, the rationale for their lack of reasonableness must be briefly provided in the EIS.

As described in **Section 1.3.2**, Treasury has considered new CPF construction as a modernization option for more than a decade. During this process, in approximately 2014, Treasury gathered data on 81 potential sites in the NCR that could support construction of a new CPF. Treasury then evaluated each of these 81 potential sites against their minimum criteria for siting such a facility. At that early stage, these 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).

Of these 81 potential sites, Treasury identified 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[1] (GSA, 2015). In late 2015, Treasury determined that only a site on a federally owned property was reasonable for two primary reasons:

1. Acquiring or leasing a privately owned property in the NCR would cost substantially more (i.e., approximately $30-60 million [M]) than re-purposing a portion of existing federally owned property in the NCR (i.e., $5-10M).
2. Federal directives order federal agencies to prioritize the reduction of federal real property assets, whenever feasible. These directives include EO 13327, *Federal Real Property Management* (2004); OMB Memorandum 2015-01, *Reduce the Footprint;* and Presidential Memorandum DCPD201000483, *Disposing of Unneeded Federal Real Estate* (2010).

Beginning in late 2015, and based on property acquisition costs, federal requirements, and their initial minimum screening criteria, Treasury eliminated from consideration the 25 privately owned sites and focused on the six federally owned sites. These six sites represented potential reasonable alternatives for further consideration by Treasury at that time (GSA, 2015).

These six federally owned sites included both vacant sites and built sites that potentially could be renovated to meet Treasury's purpose and need. In 2016, Treasury established a Facility Project Management Office (FPMO) for the sole purpose of further screening reasonable federal sites and overseeing the planning and eventual development of a new CPF. The FPMO refined the operational criteria for the proposed CPF to meet current standards and specifications, which had evolved over this time. This refinement further honed the screening criteria that Treasury applied to their site review process, as described in **Section 2.3.1**.

[1] The 25 privately owned sites were located on 22 distinct private properties. The six federally owned sites were located on six distinct federal properties.

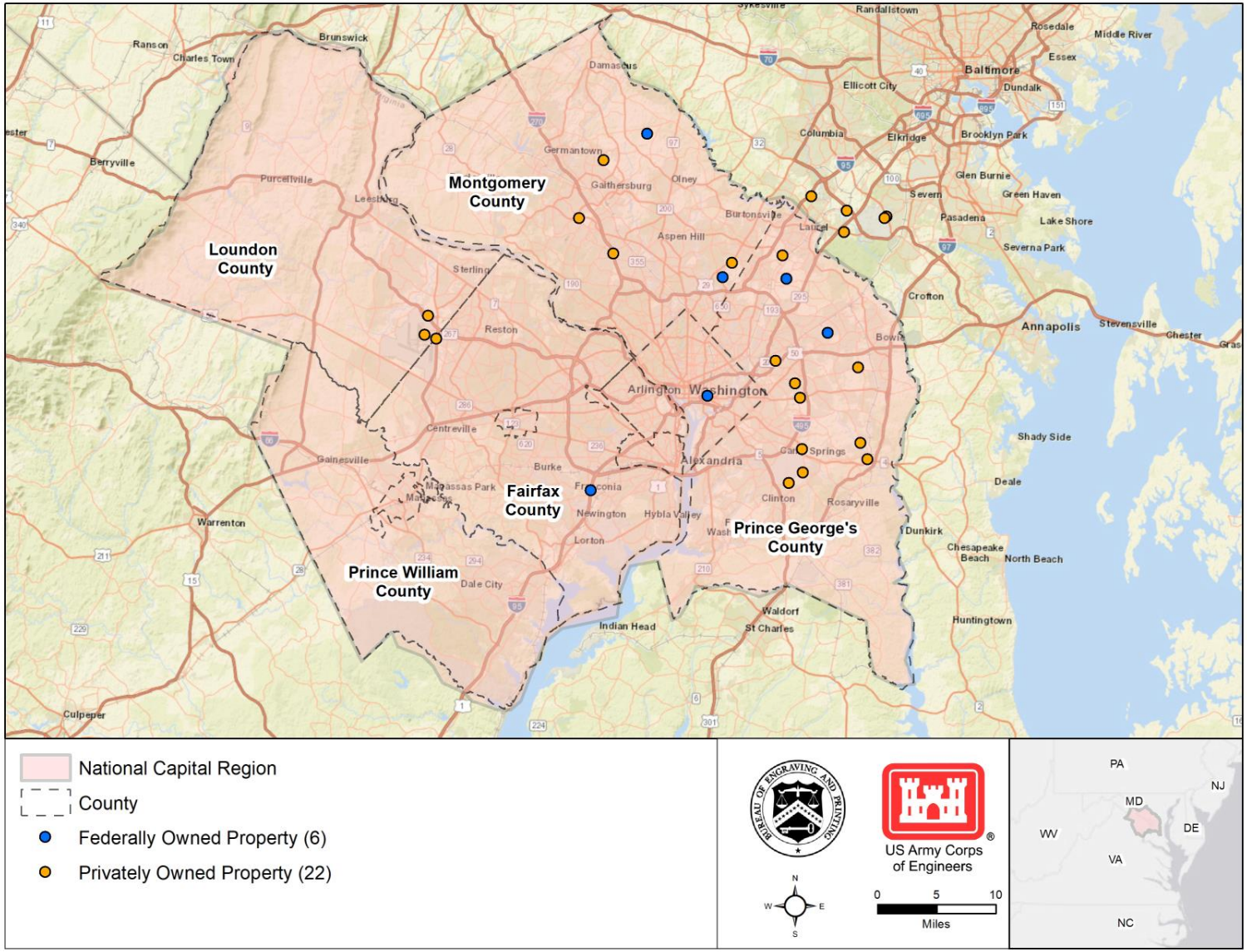


Figure 2.3-1: Potential Sites that met Treasury's Minimum Criteria

2.3.1 Site Screening Criteria

Treasury's final site screening criteria are listed below. A site must meet these criteria and achieve the purpose of and need for the Proposed Action (see **Section 1.4**) to be considered a reasonable alternative.

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).
2. **Accessibility.** A major interstate must be accessible within 10 miles of the site to transport currency safely and efficiently. The site must also be reasonably near an international airport for currency transportation by air.
3. **Availability.** The site must be available for Treasury's use within the required timeframe. The federal landowner must be willing to transfer the site to Treasury or establish a land use agreement.
4. **Parcel Size.** The site must include at least 100 acres of land of suitable configuration to construct the CPF and provide for its security/setback requirements.
5. **Developability.** The site must not be unduly constrained to development due to terrain or other construction or use limitations.

2.3.2 Alternatives Considered but Dismissed from Detailed Analysis

Through this screening process, Treasury eliminated the following five (of the six total) federal sites.

2.3.2.1 Robert F. Kennedy Memorial Stadium

Robert F. Kennedy Memorial Stadium (RFK Stadium), located at 240 East Capitol Street, Washington, DC, is a multi-purpose stadium built in 1961. It is situated on 80 acres of land near the west bank of the Anacostia River, about 2 miles east of the US Capitol building. This former sports venue is owned and operated by a quasi-public organization under a long-term lease agreement from the National Park Service (NPS) which owns the land. The DC Government is seeking a mixed-use redevelopment of the site and plans to demolish the stadium by 2021. Treasury considered reuse of this site to support the Proposed Action; however, the site is less than 100 acres in size and the lease with the NPS is subject to development restrictions that would preclude uses required by Treasury. Therefore, this alternative was dismissed.

2.3.2.2 Olney Federal Support Center

The Olney Federal Support Center, located at 5321 Riggs Road, Gaithersburg, Maryland, is an underground facility owned by the Federal Emergency Management Agency (FEMA). The Center functions as a multi-purpose data network facility situated beneath an 81-acre parcel of land, the site of the former Nike missile launch facility. Treasury considered this site to support the Proposed Action; however, the site is less than 100 acres in size. Therefore, this alternative was dismissed.

2.3.2.3 White Oak Campus

The Food and Drug Administration (FDA) owns and operates the 670-acre White Oak Campus. Located at 10903 New Hampshire Avenue, Silver Spring, Maryland, the Campus is comprised of FDA laboratories, offices, and support facilities. Working with the GSA, the FDA is implementing a development program to consolidate the previously fragmented campus, which theoretically could make land available for the Proposed Action. The consolidation project is anticipated to be completed in 2021. Treasury considered

the White Oak Campus to support the Proposed Action; however, the FDA was not amenable to a land transfer (FDA, 2020). Therefore, this alternative was dismissed.

2.3.2.4 Plant Introduction Center

The USDA Plant Introduction Center was one of four federal stations established to receive plant materials into the US for testing and evaluation. The Center, developed from 1919 to 1937, is situated on an L-shaped, 70-acre parcel of land at 11601 Old Pond Road, Glenn Dale, Maryland, near the intersection of State Roads 450 and 193. Treasury considered reuse of this site to support the Proposed Action; however, it is less than 100 acres in size. Therefore, this alternative was dismissed.

2.3.2.5 GSA Warehouse

Located at 6801 Loisdale Road, Springfield, Virginia, the 1.3 million square-foot Springfield Warehouse is a federal surplus property owned by the GSA. The warehouse is on 70 acres of land south of the confluence of roadways near the Springfield Mall, referred to as the “mixing bowl” due to severe traffic congestion. Treasury considered this property to support the Proposed Action. However, the site is less than 100 acres and was unavailable due to an existing federal tenant not amenable to relocation. Therefore, this alternative was dismissed.

2.3.3 Beltsville Agricultural Research Center

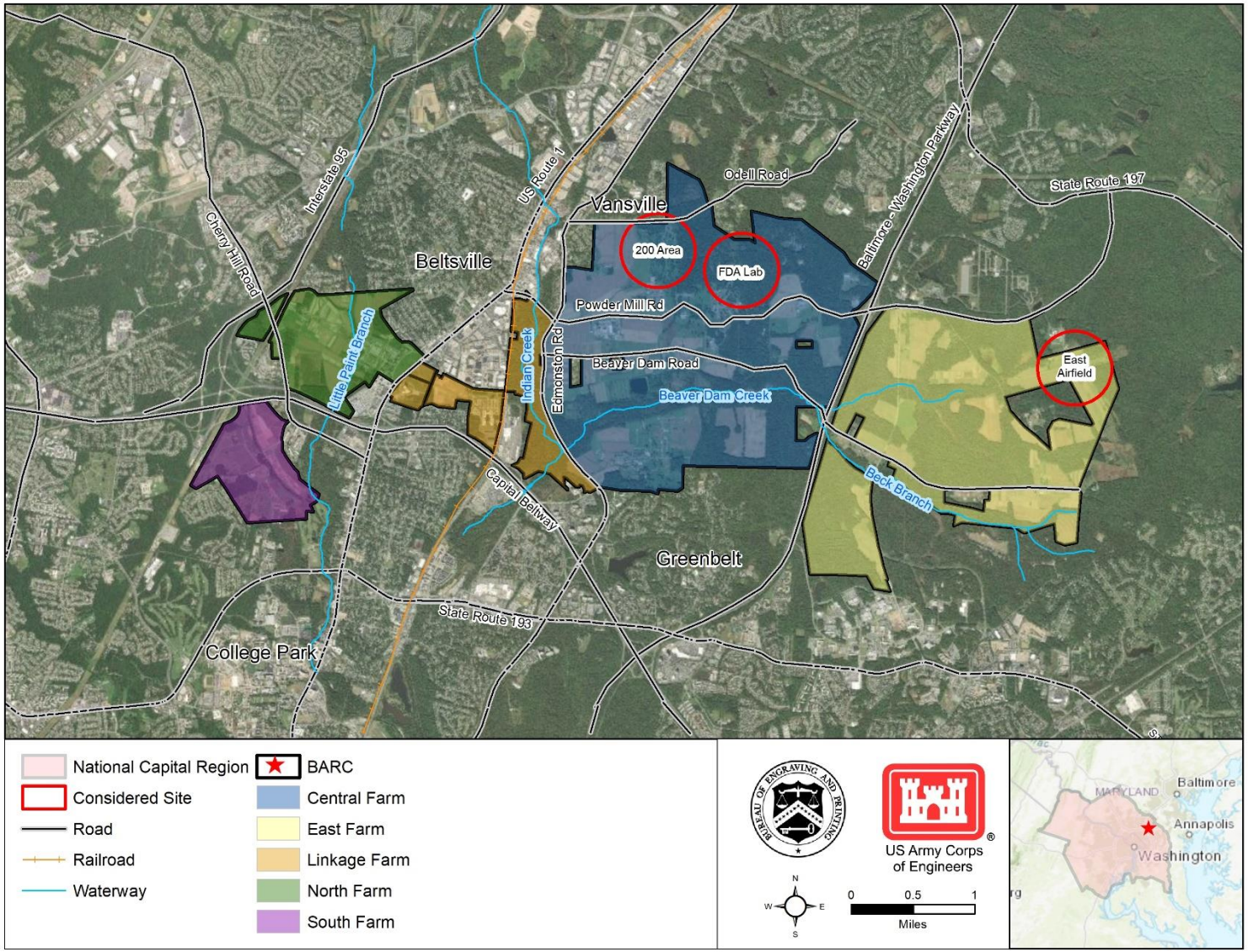
The sixth site considered by Treasury was the Henry A. Wallace Beltsville Agricultural Research Center (BARC). Located in Beltsville, Prince George’s County, Maryland, BARC is part of the Northeast Area of the Agricultural Research Service (ARS), the USDA’s main scientific research agency.

Comprised of nearly 6,600 acres of land, BARC is situated 10 miles northeast of Washington, DC and 20 miles southwest of Baltimore, Maryland (see **Figure 2.3-2**). Just outside the Capital Beltway (i.e., Interstate [I]-495), BARC is bordered by the suburban community of Beltsville, the cities of Greenbelt and College Park, and by several other federal properties.

BARC is divided into multiple farm sections, including the North Farm, South Farm, East Farm, Linkage Farm, and Central Farm (see **Figure 2.3-2**). Research at BARC currently focuses on animal and plant sciences; sustainable agriculture; nutrition, food quality, and food safety; plant genetics and diversity; and pests and diseases (USDA, 2019).

BARC met Treasury’s purpose and need, as well as most (if not all) of Treasury’s site screening criteria, depending upon the characteristics of available parcels within the 6,600-acre property. In addition, approximately 65 percent of Treasury’s employees live in Maryland, of which 43 percent live in Prince George’s County. Importantly, the USDA was amenable to a land transfer. Treasury and the USDA initially looked for existing on-BARC structures that could be renovated to meet Treasury’s requirements for a new CPF; however, none were identified.

The USDA then identified available, unused 100-acre sites within BARC that initially appeared to meet all of Treasury’s site screening criteria. Through this process, Treasury and the USDA identified three potentially suitable sites on BARC to be further investigated. Each site is identified in **Figure 2.3-2** and further described below.



937

938 **Figure 2.3-2: BARC and the Surrounding Region**

2.3.3.1 East Airfield

This alternative would site the CPF in the East Farm portion of BARC, east of the Baltimore-Washington Parkway. Bounded to the west by Springfield Road, and to the north by Powder Mill Road, the greater than 100-acre site was used during the 1940s to train units of the DC National Guard and Naval Reserve (Freeman, 2015). However, during the screening process, the USDA identified that the site was recently proposed for another federal use that would conflict with the Proposed Action. Therefore, Treasury dismissed this alternative.

2.3.3.2 Former FDA Laboratory

This alternative would site the CPF on land previously used as an FDA laboratory on BARC. The greater than 100-acre site is in the Central Farm portion of BARC, north of the northern terminus of Center Drive and west of Entomology Road. The site is heavily wooded with hilly terrain that would require extensive clearing and earthwork. Therefore, Treasury dismissed this alternative.

2.3.3.3 200 Area – Former Poultry Research Area (Treasury's Proposed Parcel)

As Treasury examined BARC for its suitability to support the Proposed Action, the Agriculture Improvement Act of 2018 (Public Law [PL] 115-334, § 7602; 132 Stat. 4490, 4825-26 [2018]), authorized by Congress and not subject to NEPA, further focused the site selection process to the 200 Area. The Agriculture Improvement Act of 2018 specifically identified Treasury's proposed parcel within the 200 Area and included a Congressional authorization for the USDA to transfer this parcel of real property at BARC to Treasury, subject to specific conditions of the transfer, for the purpose of constructing and operating the Proposed Action.

In accordance with the Agriculture Improvement Act of 2018, the USDA confirmed the availability of this parcel with Treasury through an MOA signed on February 13, 2020.

This parcel is located at the north end of Central Farm in the 200 Area building cluster of BARC. This 104.2-acre parcel is bounded by BARC's northern boundary adjacent to Odell Road. Powder Mill Road runs in an east to west direction just south of the parcel. Odell and Powder Mill Roads provide ready access to Maryland 201/Edmonston Road, US Highway 1, and the Baltimore-Washington Parkway within a 2-mile radius, all of which intersect with the Capital Beltway (i.e., I-495) to the south. Poultry Road runs north to south through the parcel, connecting Odell Road to Powder Mill Road. There is currently a barrier (i.e., security fence) at the intersection of Odell Road and Poultry Road at BARC's northern boundary. As such, all vehicle traffic on the parcel is limited to BARC personnel.

The western approximately one-third of the parcel consists of non-mission-critical cropland used by the USDA. The eastern approximately two-thirds of the parcel are dominated by periodically maintained lawn, grassland, and pastureland with scattered trees and abandoned buildings. Forested areas are present in the northwest corner of the parcel. The existing forest provides a buffer between the parcel and off-BARC residential properties along Odell Road.

Within the northern portion of the parcel, 24 buildings are distributed among a network of generally unmaintained paved and unpaved roads (i.e., the 200 Area building cluster). These buildings were primarily used for poultry research from 1914 to 2012. Most of these buildings are unused; many are dilapidated, structurally unsound, overgrown by vegetation, or otherwise unfit for reuse. All but three buildings on the site have been vacant since at least 2012 without consistent maintenance. The three buildings that are still in use include BARC's Wildlife Office and two poultry buildings.

This parcel met all of Treasury's site selection criteria and is carried forward in this EIS for further analysis as the location of Treasury's Preferred Alternative. Treasury's proposed parcel is shown in **Figure 2.3-3**.

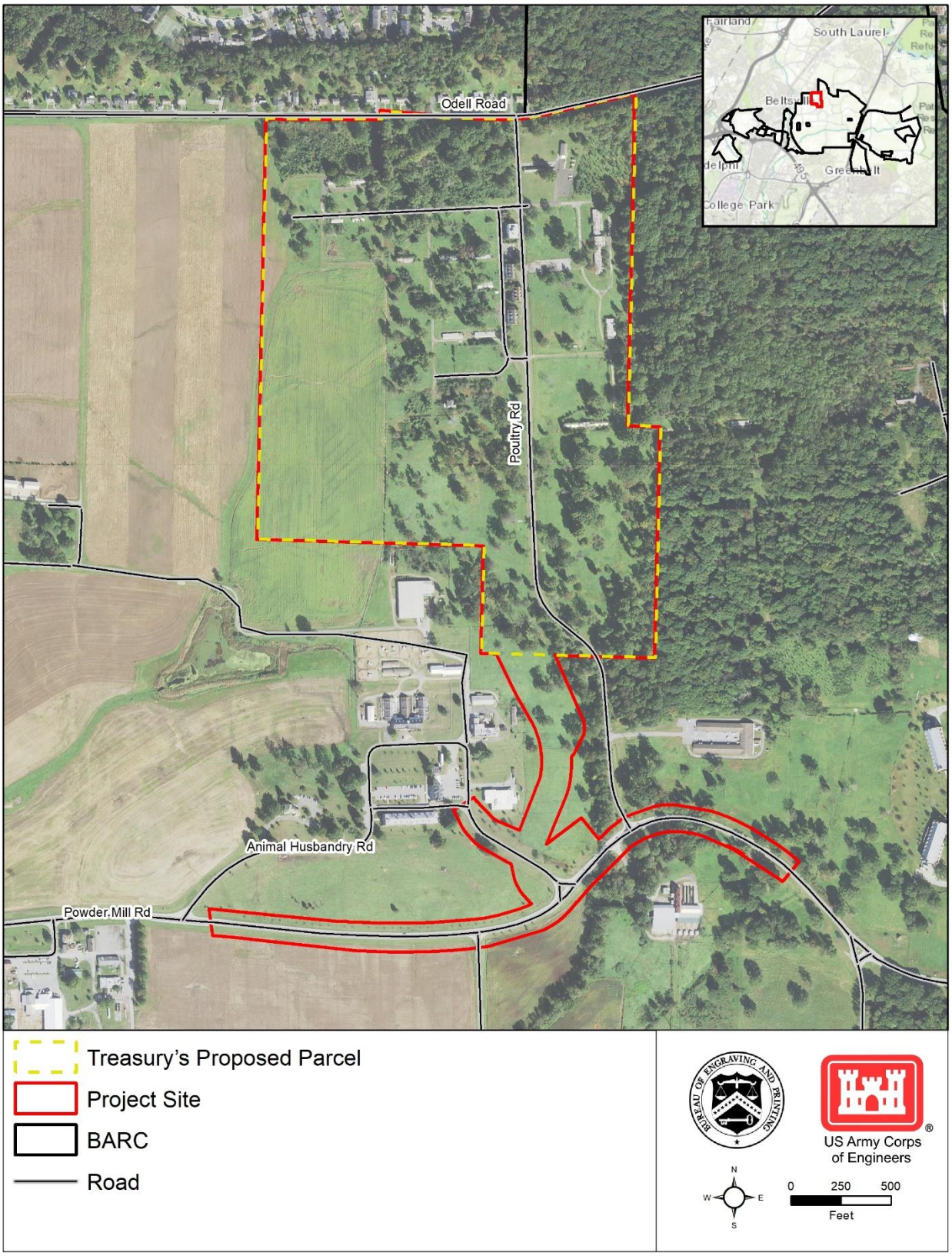


Figure 2.3-3: Project Site (Preferred Alternative) at BARC

2.4 Alternatives Retained for Detailed Analysis

Based on the above analysis, Treasury determined that only Treasury's proposed parcel (see **Section 2.3.3.3**) met its purpose of and need for the Proposed Action, as well as the established site screening criteria. This Preferred Alternative, as well as the No Action Alternative, are carried forward for detailed analysis in this EIS.

2.4.1 No Action Alternative

Under this alternative, Treasury would not construct and operate a new CPF in the NCR and would continue to operate under current conditions to the extent possible. The USDA would continue to own Treasury's proposed parcel. Treasury would continue operations in its existing, deficient, owned and leased facilities. This would result in the continuation of inefficient, less secure, and higher risk operations that do not meet Treasury's current and future mission requirements.

While the No Action Alternative would not satisfy the purpose of and need for the Proposed Action, this alternative is retained to provide a comparative baseline against which to analyze the effects of the Proposed Action (i.e., Preferred Alternative), as required under the CEQ regulations (40 CFR 1502.14[d]). The No Action Alternative reflects the status quo and serves as a benchmark against which the effects of the Proposed Action can be evaluated.

2.4.2 Preferred Alternative

The Preferred Alternative includes construction and operation of a new CPF on Treasury's proposed parcel (see **Figure 2.3-3**), an approximately 104.2-acre, federally owned, unused parcel within BARC. Treasury would construct and operate the CPF as described in **Section 2.2**, including implementing the environmental impact reduction measures identified in **Table 2.2-1**.

In addition to the main CPF within Treasury's proposed parcel, Treasury would construct a new entrance road connecting its proposed parcel to Powder Mill Road near the location of the existing Animal Husbandry Road. Treasury would also construct several minor modifications to Powder Mill Road in the vicinity of the intersection with the new entrance road to reduce potential impacts on traffic flow. Specifically, Treasury would install a traffic control device (i.e., likely a traffic light) at the intersection of Powder Mill Road and the entrance road, widen Powder Mill Road to accommodate additional lanes, and remove the existing rumble strips on Powder Mill Road. The proposed entrance road and Powder Mill Road modifications would require construction activities in an additional approximately 18-acre area, bringing the combined Project Site (i.e., Treasury's proposed parcel plus the areas of the entrance road and Powder Mill Road modifications) to a total of approximately 122 acres (see **Figure 2.3-3**).

Figure 2.5-1 depicts the current, preliminary concept site plan of the Preferred Alternative. Because the design of the proposed CPF is in an early stage of development, this concept design is subject to change as the design process progresses, and based, in part, on the data presented in this EIS. Data concerning how Treasury developed this concept plan can be found on the project website.

2.5 Alternatives' Impacts Comparison Matrix

In compliance with 40 CFR 1502.14, Treasury has developed an impact comparison matrix for the federal decision-maker and public to review a summary of potential effects by alternative for each environmental resource area of concern.

Table 2.5-1 summarizes the differences in potential environmental effects between the Preferred Alternative and the No Action Alternative. Please refer to **Section 3.0** of this EIS for more in-depth information.

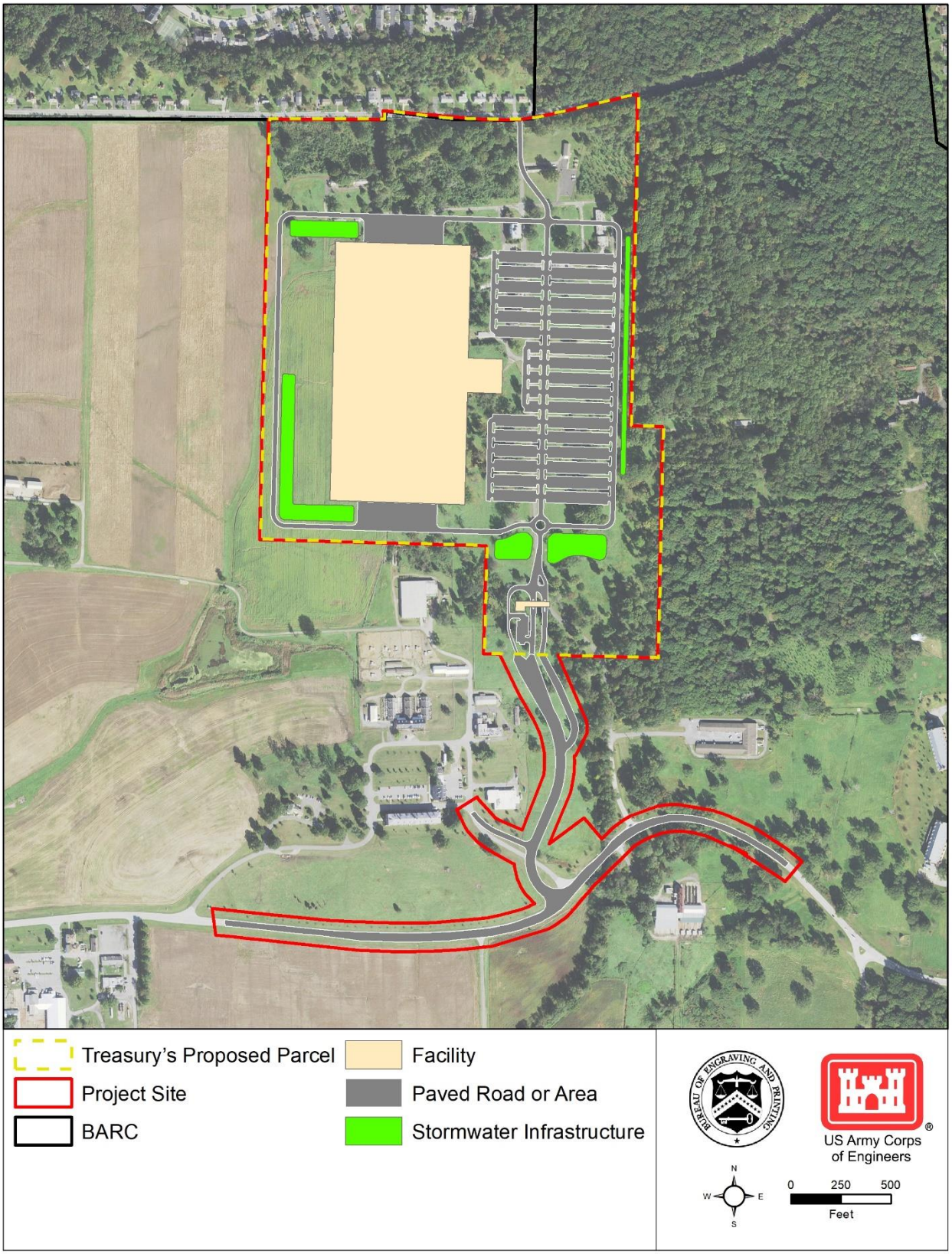


Figure 2.5-1: Concept Site Plan of the Preferred Alternative

1028 **Table 2.5-1: Summary of Potential Environmental Impacts on Evaluated Resource Areas[1]**

Resource Area	No Action Alternative	Preferred Alternative
Land Use	Less-than-significant adverse impact on land use in ROI from existing buildings falling into disrepair; no impact to zoning.	*Construction:* Less-than-significant adverse impact on surrounding land uses from construction activities. *Operation:* Less-than-significant adverse impact on land use and local planning objectives from the conversion of agricultural land to industrial land; no or negligible impact from new development in response to the proposed CPF; less-than-significant adverse impact to local zoning.
Visual Resources	Less-than-significant adverse impact to residences along Odell Road from deteriorating buildings.	*Construction:* Negligible adverse impacts for motorists; less-than-significant adverse impacts to residences along Odell Road due to views of construction activities; no impact to nighttime lighting levels. *Operation:* Less-than-significant adverse impacts to views from roadways; **potentially significant adverse impacts** to viewscapes from residences along Odell Road; negligible adverse impacts along Powder Mill Road from a new traffic control device; **potentially significant adverse impacts** on nighttime lighting levels for residences along Odell Road.
Air Quality	No impact on air quality.	*Construction:* Less-than-significant adverse impacts from criteria pollutant, fugitive dust, and GHG emissions; negligible adverse impacts from hazardous air pollutant (HAP) emissions. *Operation:* Beneficial impacts from a reduction in VOC emissions relative to the DC Facility; less-than-significant adverse impacts from non-VOC criteria pollutant emissions; no impact from fugitive dust emissions; less-than-significant adverse impacts from HAP and toxic air pollutant (TAP) emissions; no perceptible change in regional impact from GHG emissions as new GHG emissions from proposed CPF would be offset by reduction of GHG emissions from DC Facility.
Noise	No impact on noise environment.	*Construction:* Less-than-significant adverse impacts on noise-sensitive receptors from construction activities. *Operation:* Negligible adverse impacts on noise levels from operational equipment and daytime vehicle and truck traffic; less-than-significant adverse impacts on sensitive receptors around the Project Site from nighttime truck traffic traveling through BARC; beneficial impacts to noise-sensitive receptors from the removal of rumble strips on Powder Mill Road.
Geology, Topography, and Soils	No impact to geology, topography, or soils.	*Construction:* No or negligible adverse impact to soils from vegetation removal and compaction; no impact to geology or topography. *Operation:* No or negligible adverse impact from stormwater runoff; no significant impact to designated farmland soils; no impact to geology or topography.
Water Resources	No impact on water resources.	*Construction:* **Potentially significant adverse impact** on two intermittent streams from diversion and permanent fill; no or negligible adverse impacts on surface waters from erosion and sedimentation; no or negligible adverse impact on stormwater from ground disturbance; less-than-significant adverse impacts on wetlands from permanent fill; less-than-significant adverse impact on groundwater

Resource Area	No Action Alternative	Preferred Alternative
		from excavation and potential contaminant mobilization; no adverse impact to the coastal zone. *Operation:* Less-than-significant adverse impact on surface water flow from wastewater discharge; no impact to on-site surface water from withdrawals or in-water work; no or negligible adverse impact to stormwater from changes in Project Site hydrology; no impact on wetlands; no impact to groundwater quality; negligible impact on groundwater supply; no adverse impact to the coastal zone.
Biological Resources	Minor beneficial impact on biological resources from reduced human activity at the Project Site.	*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.
Cultural Resources	No impact on archaeological resources. **Significant adverse impact** on the BARC Historic District and its contributing resources due to building neglect and deterioration.	*Construction:* No impact to one potentially National Register of Historic Places (NRHP)-eligible archaeological site; less-than-significant adverse impacts on previously unknown archaeological sites if discovered during construction; less-than-significant adverse impact from the demolition of 22 contributing resources to the BARC Historic District. *Operation:* No impact on archaeological resources; **significant adverse impact** on the visual environment from the demolition of buildings and structures within the BARC Historic District and introduction and operation of the proposed CPF into the previously cohesive landscape.
Traffic and Transportation	Treasury would have no impact on traffic or transportation. However, regional background growth of the area would result in: Less-than-significant adverse impacts on traffic and public transit and negligible impacts on pedestrian and bicycle facilities in the regional ROI. **Significant adverse impact** (continued from current conditions) on one intersection in the local ROI from failing level of service (LOS) and beneficial LOS impacts to two intersections.	*Construction:* No impact on roadways in the regional ROI; less-than-significant adverse impact on traffic in the local ROI from construction worker commutes; less-than-significant adverse impact to local traffic from temporary closures on Powder Mill Road; no impact to parking or the pedestrian network; less-than-significant adverse impact to the bicycle network; negligible adverse impact to public transit from increased ridership. *Operation:* Negligible adverse impact on roadways in the regional ROI; no impact from increased truck traffic in the regional ROI; less-than-significant adverse impact from increased truck traffic in the local ROI; less-than-significant adverse impact to local traffic during congested periods; less-than-significant adverse impacts to intersections due to longer delays; **significant adverse impacts** to six intersections from a failing LOS; less-than-significant adverse impacts to intersections due to longer queue lengths; **significant adverse impacts** to one intersection from failing queue lengths; no impact to parking; minor adverse impact to the pedestrian and

Resource Area	No Action Alternative	Preferred Alternative
	Less-than-significant adverse impact to intersections from longer queue lengths in ROI, except for **significant adverse impacts** (continued from current conditions) on two intersections; and beneficial impacts at one intersection.	bicycle network; negligible adverse impacts to public transit from increased ridership.
Utilities	No impact on utilities.	*Construction:* No impact on utility supply or to non-BARC end users; negligible adverse impacts from temporary service disruptions of natural gas and water utilities; beneficial impact to BARC from improved utility efficiency. *Operation:* Negligible adverse impacts on utility demand and availability from increased usage.
Socioeconomics and Environmental Justice	No impact to the socioeconomic environment or EJ communities.	*Construction:* Beneficial impacts on the overall socioeconomic character of surrounding communities; no significant changes to socioeconomic conditions; no disproportionate impacts on EJ communities of concern from air quality, noise, and traffic and transportation. *Operation:* Beneficial impacts on communities from an increase in local revenues and spending; less-than-significant adverse impact on total employment and total earnings; no or negligible impacts on property values or labor force characteristics; less-than-significant adverse impacts on community services; less-than-significant disproportionate impacts on EJ communities from air emissions; no disproportionate impacts on EJ communities from noise; **significant adverse impacts** on EJ communities from increased traffic.
Hazardous and Toxic Materials and Waste	Less-than-significant adverse impact from existing buildings falling into disrepair.	*Construction:* Less-than-significant adverse impact from accidental release of HTMW; beneficial impact from removal and off-site disposal of regulated building materials. *Operation:* Less-than-significant adverse impacts from the potential accidental release from the use, handling, or storage of HTMW; less-than-significant adverse impact on the types and quantities of waste generated and Treasury's ability to manage these wastes.
Human Health and Safety	Less-than-significant adverse impact from the continued use of the DC Facility and the inability to address safety and security risks, specifically for Treasury staff.	*Construction:* No or negligible adverse impacts on construction worker safety from normal construction activities; less-than-significant adverse impact from inherent construction risks and potential for accidents; no or negligible adverse impacts from intentionally destructive acts. *Operation:* Beneficial impact on health and safety for Treasury staff from more efficient production flows, a reduction in the potential for worker accidents, and improved passive and active security measures; less-than-significant adverse impact from the potential for intentionally destructive acts.

1. In the "No Action Alternative" and "Preferred Alternative" columns, **bold typeface** identifies potentially significant adverse impacts.

3.0 Affected Environment and Environmental Consequences

3.1 Introduction

This section describes the environmental resources, or technical resource areas, that could be affected by the Proposed Action and identifies potential impacts to these resources from both the Preferred Alternative and the No Action Alternative (see **Section 2.3.3.1**). Analyses are quantitative whenever possible.

3.1.1 Resource Areas Analyzed in Detail

This EIS analyzes in detail 13 technical resource areas relevant to the Proposed Action and its ROI. These 13 technical resource areas, and their associated sections in this EIS, are listed in **Table 3.1-1**.

Table 3.1-1: Technical Resource Areas Analyzed in Detail

Technical Resource Area	Relevant EIS Section
Land Use	3.2
Visual Resources	3.3
Air Quality	3.4
Noise	3.5
Geology, Topography, and Soils	3.6
Water Resources	3.7
Biological Resources	3.8
Cultural Resources	3.9
Traffic and Transportation	3.10
Utilities	3.11
Socioeconomics and Environmental Justice	3.12
Hazardous and Toxic Materials and Waste	3.13
Human Health and Safety	3.14

3.1.2 Resource Areas Dismissed from Further Analysis

Additionally, in accordance with the CEQ NEPA implementing regulations, Treasury used internal and external scoping, including coordination with pertinent regulatory agencies to "identify and eliminate from detailed study the issues which are not significant or which have been covered by prior environmental review (40 CFR 1506.3), narrowing the discussion of these issues in the statement (EIS) to a brief presentation of why they would not have a significant effect on the human environment or providing a reference to their coverage elsewhere" (40 CFR 1501.7(a)(3)).

Table 3.1-2 summarizes each major resource area and sub-resource area eliminated from further analysis and provides a brief rationale for its dismissal. For additional, more detailed information justifying the dismissal of a resource, the reader is referred to the corresponding ***resource-specific Technical Memorandum***.

1051 **Table 3.1-2: Resources Dismissed from Further Analysis**

Major Resource Area Category	Rationale for Major Resource Area / Sub-resource Dismissal
Air Space	The Proposed Action does not involve aviation assets and would not construct or operate any elements that would affect air space. Further, there would be no change in existing air space restrictions.
Recreation	The Project Site is not currently available for recreation. The Proposed Action would not impact recreational opportunities on or near the Project Site.
Geology, Topography, and Soils	**Geology:** No excavation is proposed beyond 25 feet below ground surface (bgs). As such, no impacts to geology are anticipated. **Topography** and **Landslides:** The Project Site is relatively flat and poses no risk of landslides. **Seismic Hazards:** The Project Site is located in an area of low risk for seismic hazards (USGS, 2018). **Radon:** Average radon levels around the Project Site are below the USEPA's recommended mitigation threshold (USEPA, 2016). The reader is referred to the ***Geology, Topography, and Soils Technical Memorandum*** for additional information.
Water Resources	**Floodplains:** The Project Site is not located within a FEMA-designated 100-year floodplain. Neither construction nor operation of the proposed CPF would impact the quality or function of floodplains (FEMA, 2016). **Chesapeake Bay Critical Area:** The Project Site is not located within and would not disturb or affect any Chesapeake Bay Critical Areas (DNR, 2020). The reader is referred to the ***Water Resources Technical Memorandum*** for additional information.
Socioeconomics and Environmental Justice	**Protection of Children (EO 13045):** 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. The reader is referred to the ***Socioeconomics and Environmental Justice Technical Memorandum*** for additional information.
Biological Resources	**Bald Eagles (*Haliaeetus leucocephalus*):** There is no suitable bald eagle habitat on or in the vicinity of the Project Site. The reader is referred to the ***Biological Resources Technical Memorandum*** for additional information.

1052 ### 3.1.3 Framework for Impact Analysis

1053 Each subsection summarizes the baseline environmental conditions within a resource-specific ROI, or the
1054 area that could experience impacts from the Proposed Action. The ROI is limited to the Project Site for
1055 some technical resource areas (e.g., geology, topography, and soils), but often includes off-site areas that
1056 may be impacted (e.g., downstream receiving waterbodies). Treasury provides the rationale for the ROI
1057 established in each resource area subsection.

Treasury determined the potential environmental effects of the No Action Alternative and the Preferred Alternative on each technical resource area by considering the context and intensity of the Proposed Action (40 CFR 1508.27). As appropriate, the impact analysis considers both construction (see **Section 2.2.2**) and operation (see **Section 2.2.3**) of the Proposed Action, and presumes that the EPMs, RCMs, and BMPs identified in **Table 2.2-1** would be implemented should Treasury ultimately select the Preferred Alternative for implementation.

Treasury consistently used the following categories to classify potential impacts to technical resource areas:

- **None**: No adverse impacts would be expected.
- **Negligible**: Barely perceptible adverse impacts would be expected.
- **Less-than-significant**: Measurable or tangible adverse impacts would be expected but would not exceed the significance thresholds specified for the resource area.
- **Significant**: Adverse impacts would be obvious, either short-term or long-term, and would have serious consequences on a technical resource area that would be readily noticed by an observer. These impacts would include those that substantially exceed a regulatory or policy standard. They could include impacts that could be mitigated to a less-than-significant level, as well as those that cannot. Significance thresholds are provided for each resource area.
- **Beneficial**: Impacts would improve the condition of the technical resource area in the ROI.

Where compliance with applicable laws or regulations would be insufficient to avoid, minimize, rectify, reduce, or compensate adverse impacts (40 CFR 1508.20), Treasury identifies practical recommended mitigation measures that would further achieve this purpose when feasible; the ROD will identify which mitigation measures Treasury would implement with its Selected Alternative. Recommended mitigation measures for each technical resource area are summarized in **Section 5.5**.

Finally, each subsection links to a ***resource-specific Technical Memorandum*** that describes the regulatory context, existing conditions, and potential environmental effects to the technical resource area in greater detail, including the approach to the analysis and significance criteria considered. The level of analysis for each technical resource area is commensurate with the potential for associated significant impacts.

3.2 Land Use

This section describes the land use in the Proposed Action's ROI and potential impacts on land use from the Proposed Action (i.e., Preferred Alternative) and No Action Alternative. Measures to reduce potential adverse land use impacts from the Proposed Action are identified. Concerns expressed during public scoping regarding land use are considered and addressed. The reader is referred to the ***Land Use Technical Memorandum*** for additional, more detailed information related to the data presented in each of the following sections.

3.2.1 Affected Environment

3.2.1.1 Region of Influence

The ROI for this analysis includes the Project Site and all areas within one mile of the Project Site (see **Figure 3.2-1**). These areas may be influenced, directly or indirectly, by activities associated with the Proposed Action.

3.2.1.2 Applicable Guidance

The primary land use regulations and guidance related to the Proposed Action are the Maryland Sustainable Growth and Agricultural Preservation Act, Prince George's County Zoning Ordinance (Prince George's County Code, Subtitle 27, Part 2), the Maryland-National Capital Park and Planning Commission (M-NCPPC) Prince George's 2035 Approved General Plan and Prince George's County Priority Preservation Area Functional Master Plan, and the National Capital Planning Commission (NCPC) Comprehensive Plan for the National Capital. Collectively, these regulations and guidance documents specify permitted land uses and long-term recommendations for future development. Further, local planning authorities have developed policies and goals for the preservation of agricultural areas and open space within the ROI, some of which identify BARC specifically.

Per the US Constitution, state and local agencies cannot regulate land use on or zone federal property. Treasury, however, considered the land use and zoning designations and guidance within the ROI as part of this analysis.

3.2.1.3 Existing Conditions

The Project Site, including Treasury's proposed parcel, is located in Prince George's County and the NCR planning district, approximately 2.5 miles east of I-95 and 1.5 miles west of I-295. Land use in the ROI is typical of the NCR; it consists of an established mixed community including residential, commercial, industrial, and open space uses (see **Figure 3.2-1**). Land uses in the northern and western portions of the ROI, particularly north of Odell Road and west of Edmonston Road, include mostly private residential areas, commercial and retail establishments, and light and heavy industry.

The Project Site currently contains institutional (57.7 acres), agricultural (60.7 acres), and forested (3.8 acres) land uses. It contains 24 buildings (mostly in disrepair), asphalt-paved/unpaved roads, one gravel parking area, an approximately 21-acre agricultural research plot, cropland, forest, grassland/meadows, and wetlands.

Prince George's County consists of five major zoning types: Residential, Comprehensive Design, Industrial, Commercial, and Mixed-Use and Planned Community. Please refer to the Prince George's County Guide to Zoning Categories for further information on these zoning categories (M-NCPPC, 2010).

The Project Site, including Treasury's proposed parcel, is zoned under the Reserved Open Space[2] (R-O-S) zoning classification within the Residential major zoning type (USDA, 2009a). R-O-S currently accounts for 65.8 percent of zoned land within the ROI (see **Figure 3.2-2**).

3.2.2 Environmental Effects

This section analyzes potential effects on land use within the ROI that could occur under the Proposed Action (i.e., Preferred Alternative) and No Action Alternative. The reader is referred to the ***Land Use Technical Memorandum*** for a complete discussion of potential effects.

3.2.2.1 No Action Alternative

Under the No Action Alternative, Treasury would not construct the Proposed Action. Land use and zoning within the ROI would not change due to the Proposed Action. The existing facilities within the Project Site would continue to fall into disrepair, potentially resulting in a continued ***less-than significant adverse impact*** on land use in the Project Site and ROI. Further, the No Action Alternative would not preclude future redevelopment of the Project Site by another federal proponent with Congressional authorization.

[2] The Reserved Open Space zoning classification includes a limited range of public, recreational, and agricultural uses (M-NCPPC, 2020).

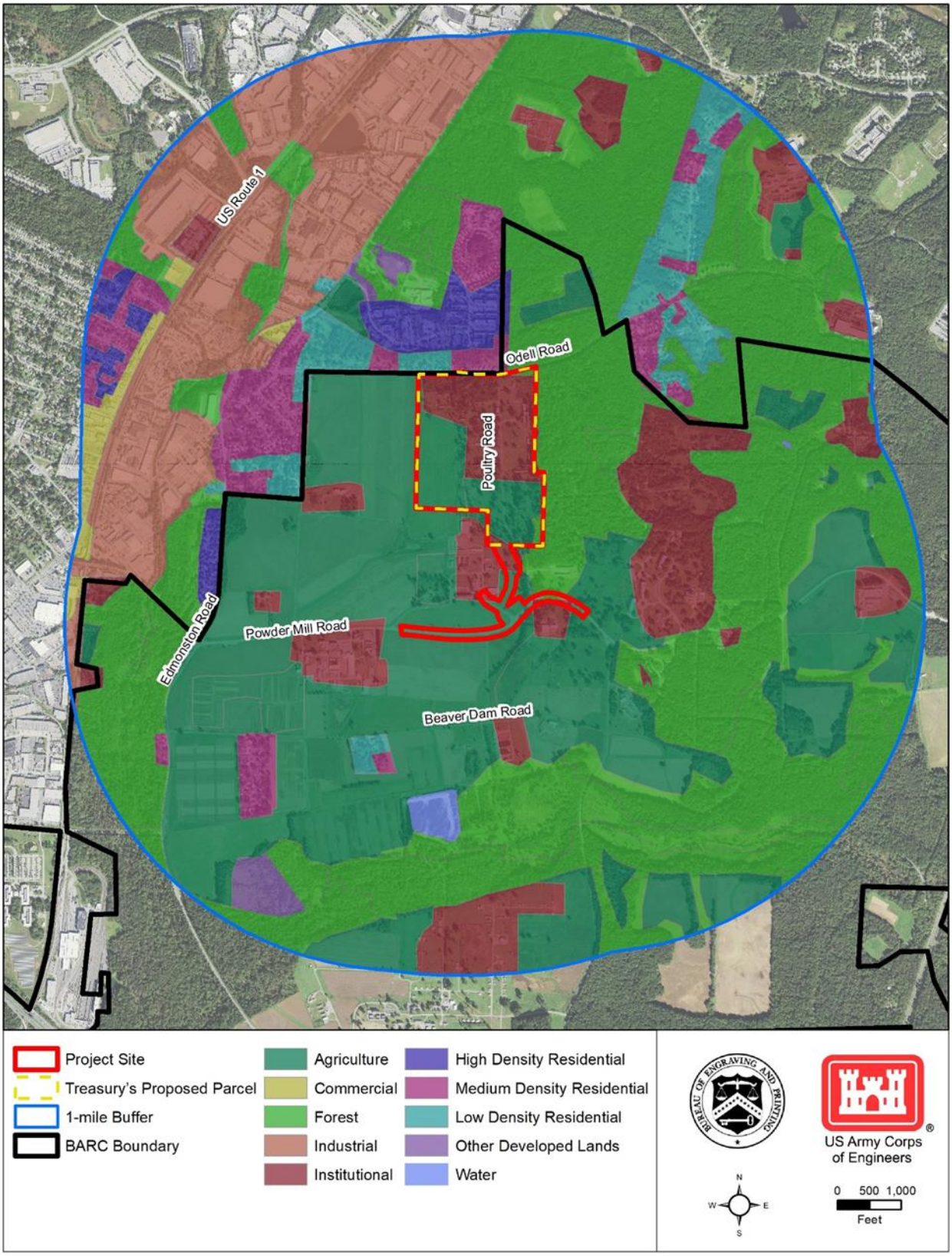


Figure 3.2-1: Existing Land Use within the ROI

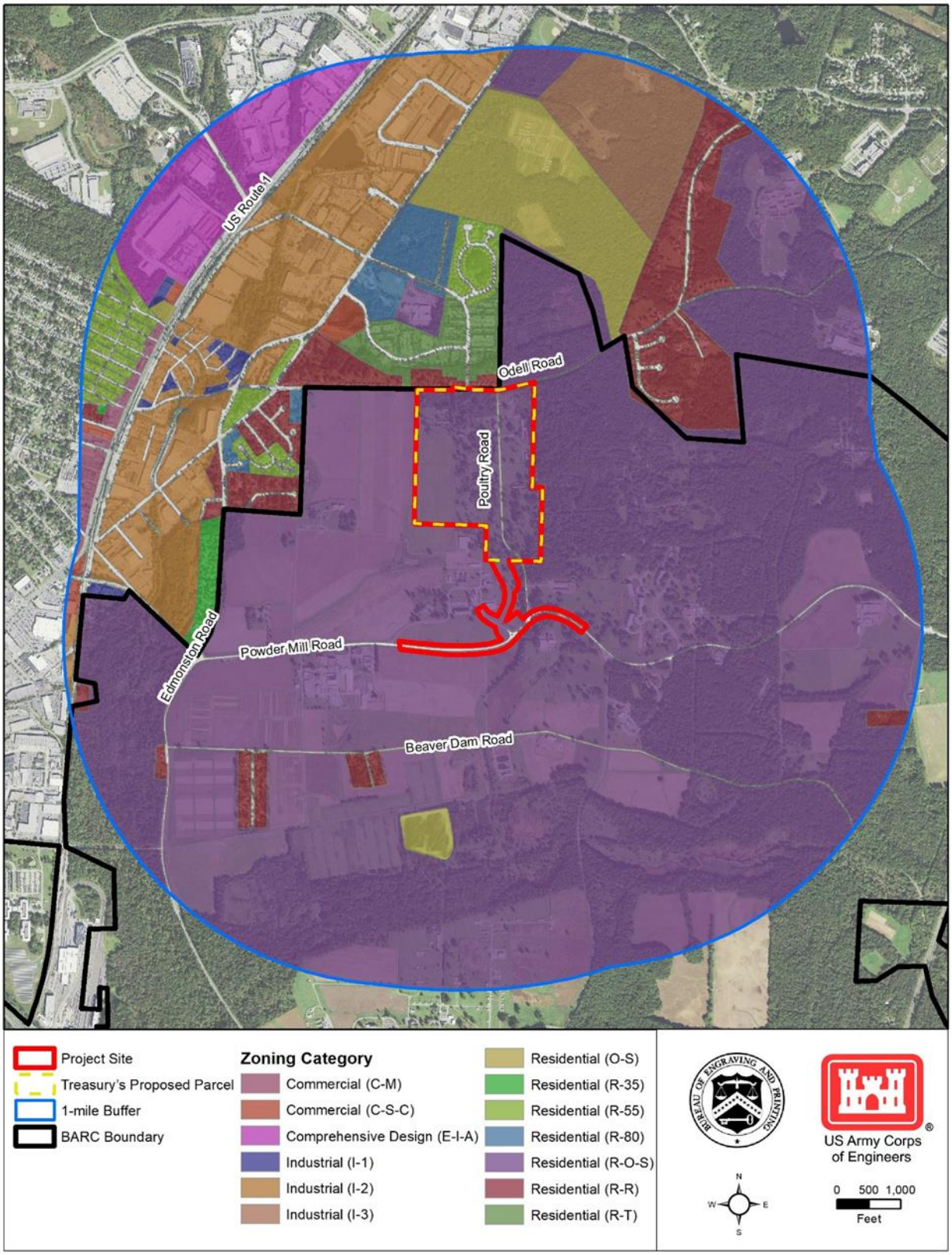


Figure 3.2-2: Existing Zoning within the ROI

3.2.2.2 Preferred Alternative

Land Use

Construction

During construction of the proposed CPF, the majority of the Project site (i.e., all areas except the northern forested buffer and the wetland area in the southeast corner of Treasury's proposed parcel) would become an active construction area. All activities would be confined to the Project Site. Potential adverse effects on nearby land uses would be minimized with implementation of EPMs identified in **Section 2.2.4**, such as use of temporary privacy fencing along Odell Road and the proposed entrance road to obstruct the view of most construction activities from public areas. As evidenced by the established mixed-use community within the ROI, similar construction activities to the Proposed Action have occurred within the ROI throughout the past several decades. Thus, construction of the Proposed Action would be typical for the area and shielded from direct view off-site, resulting in a ***less-than-significant adverse impact*** on land use in the ROI.

Operation

The USDA would transfer the 104.2-acre proposed parcel to the Treasury; thus, the site would remain under federal ownership. The proposed entrance road and Powder Mill Road rights-of-way would remain under the USDA's ownership.

Under the Preferred Alternative, the entire proposed parcel would be converted to "Industrial" land use. The proposed entrance road and Powder Mill Road rights-of-way would remain classified according to their existing land uses (i.e., "Institutional" and "Agricultural"). During operation, Treasury would conduct its manufacturing activities (i.e., currency production) inside a secure facility. Activities would not be visible to other land uses (i.e., Residential) within the ROI. Treasury's operational activities in its proposed parcel would be consistent with other industrial facilities in the ROI in terms of intensity. Treasury anticipates that no existing adjacent land uses would be discontinued as a result of the Preferred Alternative.

Currently, 21.1 acres of the designated "Agricultural" land within the approximately 122-acre Project Site are actively used for agricultural purposes (i.e., row crops; see **Section 3.8**). The conversion of this active cropland under the Preferred Alternative would reduce active cropland at BARC by approximately 1.0 percent; this conversion would not require the USDA to increase agricultural land or production elsewhere on BARC to meet its mission, as sufficient agricultural capacity exists on BARC. Overall, conversion of all designated "Agricultural" land in the Project Site (i.e., 60.7 acres) would constitute reductions of this land use by 4.5 percent and 0.01 percent in the ROI and county, respectively.

BARC, however, is included in Prince George's County's Priority Preservation Area and the NCPC's regional parks and open space network (M-NCPPC, 2012; NCPC, 2018). Converting Treasury's proposed parcel to industrial land use would conflict with these local plans and associated planning goals. Therefore, the conversion of agricultural land use, including both active cropland and general agricultural land use, within the ROI would have a ***less-than-significant adverse impact*** on land use and local planning objectives for agricultural land preservation.

Due to the increased presence of Treasury employees, the Proposed Action could create an incentive for the development (or redevelopment) of other, non-BARC, properties near the Project Site. The possibility of any such development in the ROI in response to the development of the proposed CPF, however, is speculative and would be dependent on market conditions and other factors that are not related to the Proposed Action. Therefore, the potential contribution of the Proposed Action to regional development would have ***no or negligible impact*** on land use within the ROI.

Zoning

The USDA would transfer custody and control of the 104.2-acre parcel to Treasury as agreed upon under the MOA. Treasury would construct and operate an "Industrial" facility within its proposed parcel, which is and would continue to be zoned as "Residential" (R-O-S) land (approximately 102.7 acres) and existing roadways (1.5 acres). "Residential" zoning currently comprises a large majority of the ROI at 79.9 percent, and more specifically, R-O-S comprises 65.8 percent of the ROI. Treasury's proposed parcel occupies only 2.8 percent of the ROI, so its use would not substantially affect the area available for "Residential" (R-O-S) uses in the ROI. Therefore, Treasury's use of its proposed parcel for operations incompatible with existing zoning would have a ***less-than-significant adverse impact*** on local zoning. No incompatible operations would occur or likely be induced in the ROI outside of Treasury's proposed parcel under the Preferred Alternative.

3.2.3 Mitigation Measures

Treasury should implement the following project-specific mitigation measure to reduce the potential for adverse zoning impacts:

- Although not required, obtain a zoning reclassification of Treasury's proposed parcel from the Prince George's County Planning Department's Development Review Division from "Residential" to "Industrial."

3.3 Visual Resources

This section describes visual resources in the Proposed Action's ROI and potential impacts on these resources from the Proposed Action (i.e., Preferred Alternative) and No Action Alternative. Measures to reduce potential adverse impacts on visual resources from the Proposed Action are identified. Concerns expressed during public scoping regarding visual resources are considered and addressed. The reader is referred to the ***Visual Resources Technical Memorandum*** for additional, more detailed information related to the data presented here.

3.3.1 Affected Environment

3.3.1.1 Region of Influence

The ROI for visual resources is the viewshed from which the Proposed Action would be visible off-site, including federal and non-federal properties (see **Figure 3.3-1**). It is generally bounded by Odell Road to the north, the BARC boundary and Edmonston Road to the west, Powder Mill Road to the south, and a forested area to the east. **Figure 3.3-1** also includes the locations of several viewpoints used to conduct the visual resources impact analysis (see the ***Visual Resources Technical Memorandum***).

3.3.1.2 Applicable Guidance

There are two visual resources guidance documents relevant to the Proposed Action: the Prince George's County Master Plan of Transportation (M-NCPPC, 2009), and the GSA Public Building Service (PBS) NEPA Desk Guide[3] (GSA, 1999). Additionally, the Prince George's County Code of Ordinances (Section 27-562) regulates parking lot lighting and associated off-site impacts. Collectively, these documents guide visual impact analyses and conservation of existing viewsheds during development in visually sensitive locations.

[3] While Treasury is not required to follow this NEPA Desk Guide as the Proposed Action is not a GSA action, Treasury used the NEPA Desk Guide for general guidance related to conducting this visual resources impact analysis.

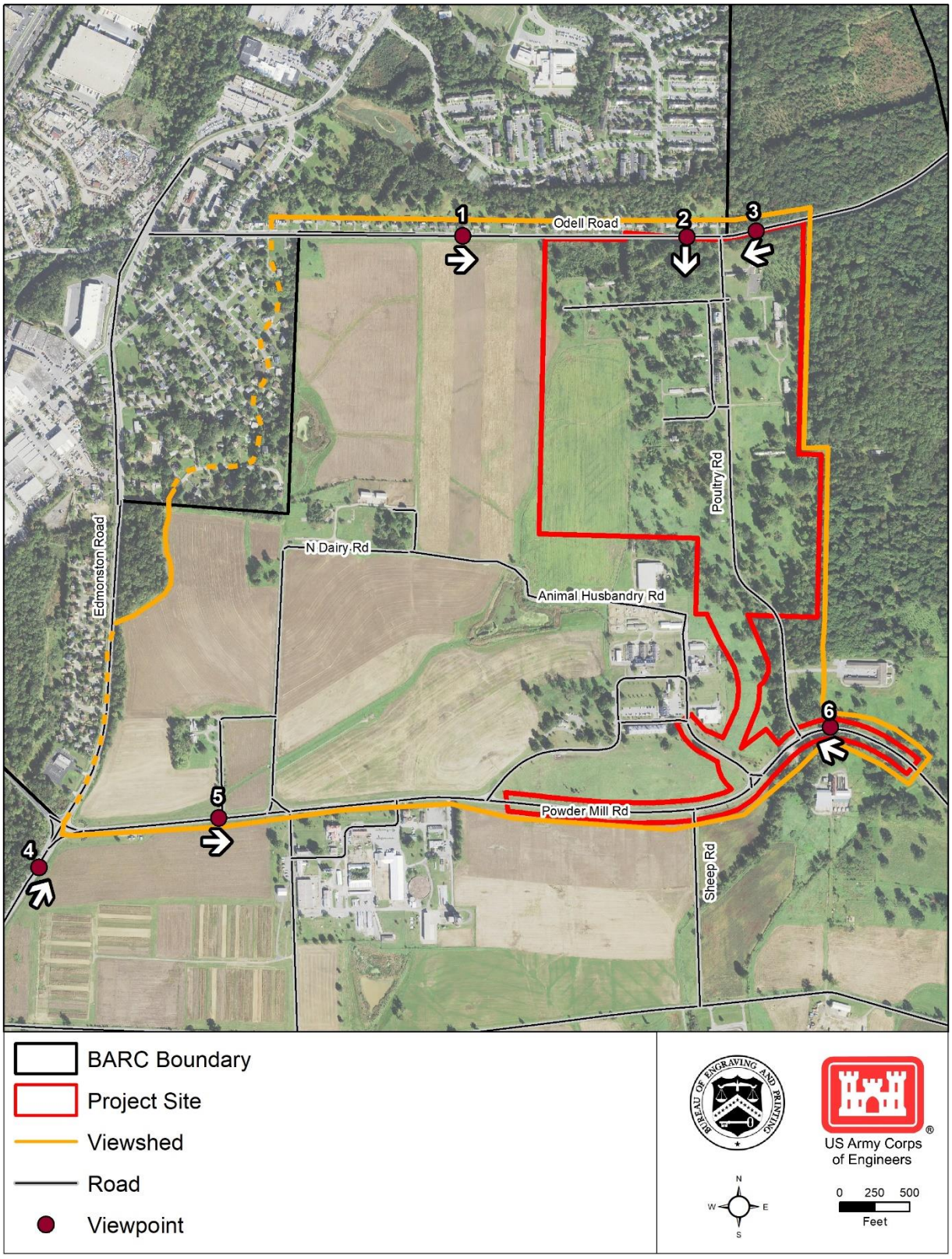


Figure 3.3-1: Visual Resources ROI

3.3.1.3 Existing Conditions

The overall visual landscape of the ROI is rural-suburban with mixed use development and open space. Open space is interspersed with the built environment and includes wooded areas, open meadows with mature trees, agricultural fields, and lawns. Buildings include one- and two-story residences and one- to five-story BARC facilities. The entirety of BARC comprises the BARC Historic District, a historic property listed on the NRHP (see **Section 3.9**). Visibility to the Project Site within the ROI is highly variable, and, in many instances, seasonally affected by the presence of intervening deciduous plants.

Views from Roadways

Views along Odell Road in the ROI are characterized by single-family houses set back by landscaped yards and driveways to the north; the facilities, agricultural fields, and forestland associated with BARC's Central Farm area to the south; and power lines, poles, and a chain-link fence along BARC's boundary. Views along Edmonston Road in the ROI are characterized by a small area of forest to the west and BARC to the east. Views along Powder Mill Road in the ROI are characterized by BARC's Central Farm area. The most prominent views of the Project Site occur along short segments of Odell Road and Powder Mill Road.

Please refer to the ***Visual Resources Technical Memorandum*** for photographs of Viewpoints 1 through 6, as shown on **Figure 3.3-1**; these viewpoints are representative of views along these roads in the ROI.

Views from Residences

Views from approximately 34 residences located along Odell Road are comparable to those described for the roadway itself. In some cases, views from residences to the northwest and west of the Project Site have more expansive views, which are particularly prominent from second-story windows. Most homes on this road, however, are single-story.

Lighting

Light sources in the ROI include operational BARC facilities, street lights, residences, and vehicle headlights. Relative to average conditions in the NCR, light emitted in the ROI is minimal due to the vast open spaces associated with BARC's agricultural mission. Generally, lighting in the ROI does not cause glare.

3.3.2 Environmental Effects

This section analyzes the potential impacts to visual resources within the ROI that could occur under the Proposed Action (i.e., Preferred Alternative) and the No Action Alternative. The reader is referred to the ***Visual Resources Technical Memorandum*** for a complete discussion of potential effects.

3.3.2.1 No Action Alternative

Under the No Action Alternative, Treasury would not construct or operate the Proposed Action. Visual resources in the ROI would not change. Existing dilapidated, unoccupied structures on the Project Site would continue to deteriorate, potentially resulting in a continued ***less-than-significant adverse impact*** to the residences along Odell Road; however, these Project Site structures are minimally visible from other off-site areas in the ROI. Relatively dark evening/nighttime conditions would continue.

3.3.2.2 Preferred Alternative

Views from Roadways and Residences

Construction

Construction of the Preferred Alternative would alter the viewshed in the ROI by removing existing built and natural features at the Project Site. Views from roadways would become less rural-suburban in character,

but similar construction activities have occurred nearby throughout the past several years (see **Section 3.2**). Construction activities would be most visible from Odell Road; however, existing topography and vegetation along the roadside and BARC's boundary would generally obscure the Project Site from view. Views of construction of the proposed CPF from Edmonston Road and Powder Mill Road would be minimal due to the Project Site's distance from these roads. Views of construction of the proposed entrance road and of improvements to Powder Mill Road would be obvious to motorists; however, they would be temporary and would be consistent with other views of roadway construction that motorists frequently experience. Overall, there would be ***negligible adverse impacts*** to visual resources for motorists traveling through the ROI.

Residences along Odell Road could potentially have unobstructed views of construction activities for the duration of the construction phase (i.e., from approximately 2021 to 2025). Site disturbance would be concentrated in the first few years, as construction activities transition from construction of the external shell of the proposed CPF to internal facility preparation. As such, these residences could temporarily experience ***less-than-significant adverse impacts*** on visual resources during construction of the proposed CPF. These residences would not be able to see construction activities related to the proposed entrance road and improvements to Powder Mill Road due to distance and intervening topography.

Operation

Once constructed, the proposed CPF would be a permanent feature of the visual landscape; the ***Visual Resources Technical Memorandum*** contains a conceptual rendering of the proposed CPF from the vantage point of each viewpoint identified in **Figure 3.3-1**.

Views in the ROI would be altered as the Project Site's land use would change from a former, but now dilapidated, poultry research area to a large manufacturing facility. The proposed CPF would be most visible from Odell Road, and views from Powder Mill Road and Edmonston Road would be intermittently obscured by topography and vegetation. While the ROI is generally rural-suburban in character, it is located near other industrial settings, and the proposed CPF would not be substantially out of character for motorists. With implementation of EPMs described in **Section 2.2.4**, operation of the Preferred Alternative would result in ***less-than-significant adverse impacts*** on visual resources in the ROI from roadways.

Operation of the Preferred Alternative would be more visible from the residences along Odell Road than from the roadways. The 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. Therefore, the Preferred Alternative would result in ***potentially significant adverse impacts*** to visual resources for up to 34 residences along Odell Road.

The completed proposed entrance road and modifications to Powder Mill Road would be visible from Powder Mill Road, but would be consistent with existing roads in the ROI. The new intersection between the entrance road and Powder Mill Road would include a traffic control device, such as a stoplight, which would comprise a notable new feature visible to the public and alter how the public interacts with the landscape (e.g., by requiring motorists to stop within the ROI where currently there is no stoplight). Such a traffic control device, however, would not be likely to substantially detract from the surrounding viewscape, and would result in ***negligible adverse impacts.***

Lighting

Construction

Construction would likely be limited to the hours between 7:00 a.m. and 6:00 p.m. (see **Section 3.5**). ***No impacts*** to nighttime lighting levels in the ROI would occur.

Operation

The Preferred Alternative would include new external security and operational lighting sources that could be visible from nearby properties in the ROI, thereby increasing the amount of nighttime light relative to existing conditions and creating the potential for glare. Treasury would minimize off-site light pollution through sensitive design of the proposed CPF to the extent feasible; however, it would remain distinctly visible within the ROI at night. As such, operation would result in ***potentially significant adverse impacts*** on nighttime lighting levels in the ROI, and specifically for up to 34 residences along Odell Road.

3.3.3 Mitigation Measures

Treasury should implement the following project-specific mitigation measures to further reduce the potential for adverse impacts to visual resources:

- 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 within the ROI. Use fencing that resembles residential fencing and does not appear threatening to adjacent viewers.
- 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.
- Use a spectrum of light generally perceived as more natural, such as light-emitting diode (i.e., LED), metal halide, or halogen elements.
- Avoid high-intensity discharge (i.e., HID) or fluorescent lights (except compact fluorescent bulbs that screw into standard sockets) on the exterior of buildings.

3.4 Air Quality

This section describes the existing air quality in the Proposed Action's ROI and potential impacts on air quality from the Proposed Action (i.e., Preferred Alternative) and No Action Alternative. Concerns expressed during public scoping regarding air quality are considered and addressed. The reader is referred to the ***Air Quality Technical Memorandum*** for additional information related to the data presented in each of the following sections.

3.4.1 Affected Environment

3.4.1.1 Region of Influence

The ROI for this analysis is Prince George's County and the NCR (see **Figure 3.4-1**). The USEPA uses regional, contiguous geographic areas to determine an area's National Ambient Air Quality Standards (NAAQS) compliance, such as a county, city, or other regionally connected areas. The USEPA includes the Project Site within Prince George's County to determine the area's NAAQS attainment status (USEPA, 2019c). Further, the Clean Air Act (CAA) defines larger regional, contiguous geographic areas that have relatively uniform air quality conditions as Air Quality Control Regions (AQCRs). Both the Project Site and the DC Facility are in the "National Capital Interstate" AQCR, which is equivalent to the NCR (40 CFR 81.12).

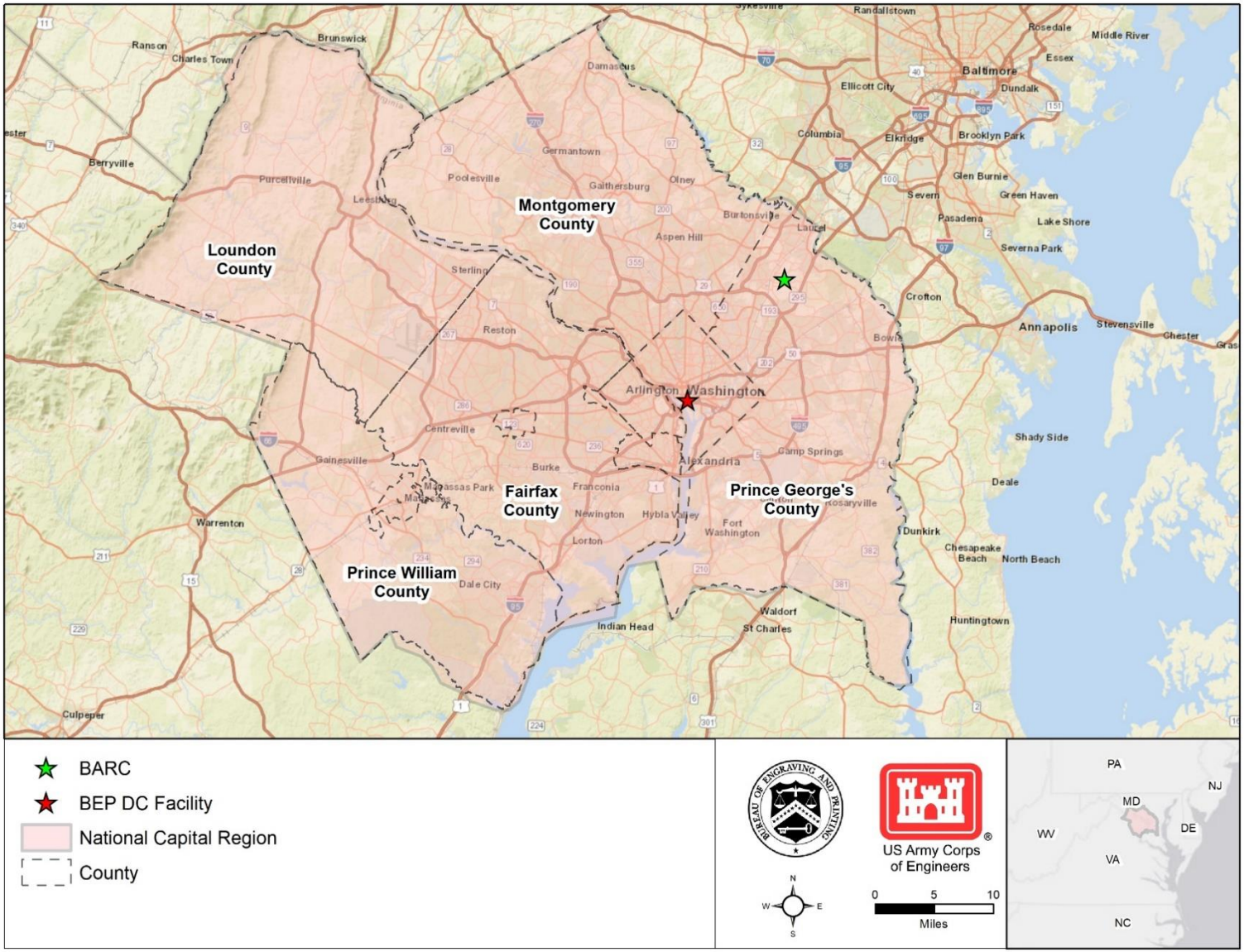


Figure 3.4-1: Air Quality ROI

3.4.1.2 Applicable Guidance

Treasury would comply with all federal, state, and local air quality laws and regulations while constructing and operating the Proposed Action. Please refer to the ***Air Quality Technical Memorandum*** for a complete list of applicable laws and regulations relevant to air quality.

3.4.1.3 Existing Conditions

Regional Overview

Prince George's County is in marginal non-attainment for 2015 8-hour ozone (O_3) and in maintenance for 2008 8-hour O_3 and 1971 carbon monoxide (CO) (USEPA, 2019c).

The MDE maintains an Ambient Air Monitoring Program with 24 air monitors around the state that measure ground-level concentrations of criteria pollutants and HAPs. Three of these stations are in Prince George's County, with two of those within the unincorporated city of Beltsville: HU-Beltsville, located on the Howard University Beltsville Campus approximately 1 mile north of the Project Site; and Beltsville-CASTNET, located on the East Airfield at BARC approximately 3 miles southeast of the Project Site (USEPA, 2019g).

A 2017 inventory by MDE found annual state-wide GHG emissions to be approximately 78,493,210 metric tons of carbon dioxide (CO_2) equivalent (CO_2e)[4] (not including sinks). In 2017, the sector that contributed the most to GHG emissions in Maryland was transportation at approximately 41 percent of the total GHG emissions (MDE, 2019b).

Treasury's Existing Air Emission Sources and Emissions

The BEP's DC Facility currently holds a Title V permit (Permit Number 035-R1). The BEP's WCF does not require a Title V permit because its potential to emit[5] (PTE) emissions are below the applicable major source thresholds in its region (BEP, 2015). **Table 3.4-1** shows the PTE emissions from stationary sources at the Treasury's DC Facility and WCF; for comparative purposes, this table also shows the associated actual emissions from the DC Facility in 2018, which are substantially lower than the DC Facility's PTE emissions (BEP, 2018c).

Treasury's emphasis on energy and operational efficiency has reduced the BEP's GHG emissions by approximately 30 percent since 2008 (or 20,000 metric tons of CO_2e per year). Current and planned projects for future emission reductions include replacing nickel plate electroforming with laser engraving, chromium electroplating with an emission-free physical vapor deposition plating process, evaluating the use of additional inks and solvents with low VOC contents (e.g., UV inks), evaluating the use of additional emissions and process controls, using electricity from renewable energy sources, and continuing to conduct comprehensive air emission and GHG evaluations (BEP, 2019d).

[4] Each GHG is assigned a global warming potential, which refers to the ability of a gas or aerosol to trap heat in the atmosphere. The global warming potential rating system is standardized to CO_2, which has a value of one. The equivalent CO_2 rate is calculated by multiplying the emissions of each GHG by its global warming potential and adding the results together to produce a single, combined emissions rate representing all GHGs, referred to as the CO_2 equivalent (CO_2e) (Yale Climate Connections, 2009).

[5] The USEPA defines PTE as the maximum capacity of a source to emit when considered with its physical and operational design, including any limitations on the source that are enforceable by the USEPA, such as air pollution controls, operational restrictions, and regulatory requirements (USEPA, 1998). Permitting requirements, such as under Title V, are based on a source's PTE. A source's "actual" emissions, or those emissions actually emitted under normal operating conditions, are typically lower.

Table 3.4-1: Treasury's Emissions (Current Conditions)

Pollutant	Sources	DC Facility 2018 Actual (tons per year [tpy], or metric tons CO_2e for GHGs)	DC Facility PTE (tpy)	WCF PTE (tpy) and 2018 Actual GHGs (metric tons CO_2e)[1]
VOCs	presses (primary), paint shop, diesel emergency generators, fire pumps, ink solids handling, and miscellaneous sources[2]	22.63	83.12	43.70
Combined HAPs	presses (primary), paint shop, diesel emergency generators, fire pumps, and miscellaneous sources[2]	0.16	4.61	0.98
HAP: Chromium	plating lines	2.99E-06	8.70E-04	<0.01
HAP: Nickel	plating lines	5.59E-05	2.00E-03	0.04
Particulate Matter (PM)	Central Trim System (primary), diesel emergency generators, fire pumps, and ink solids handling	0.06	2.39	2.75
NO_x	diesel emergency generators and fire pumps	0.32	7.07	5.13
SO_2	diesel emergency generators, fire pumps, and plating lines	0.00	0.03	0.02
CO	diesel emergency generators and fire pumps	0.02	0.60	10.23
GHGs[3]	various stationary sources, including presses, diesel emergency generators, and fire pumps	21,974[3]	N/A	21,932

1. WCF PTE calculations, besides printing operations, include only emissions from the thermal oxidizer and do not include diesel emergency generators or boilers.
2. Miscellaneous sources are those considered to be "insignificant activities" in the Title V. These include, but are not limited to, small shop operations (e.g., carpentry, electrical, masonry), a small laboratory with fume hoods, and small stationary fuel burning equipment (e.g., kitchen equipment) (BEP, 2018c).
3. The Landover warehouse contributes 781 metric tons of CO_2e to this total.

Project Site

Existing air emissions at the Project Site are minimal; most of the buildings on the Project Site are unused and no longer generate air emissions (e.g., from HVAC equipment). Minor emissions from mobile sources are present when vehicles are on-site intermittently.

No sensitive air quality receptors – which include children, the elderly, or the infirmed – are present on the Project Site. Off-site sensitive receptors, defined as those within 1,500 feet of the Project Site where localized air quality impacts (e.g., dust) would be most noticeable, include the following (see **Figure 3.4-2**):

- Children, elderly, and infirmed persons who may live in the approximately 391 residential properties along Odell Road and in the Vansville community.
- Children at Touch of Eden Daycare and Vansville Elementary School (located approximately 1,300 and 1,500 feet north of the Project Site, respectively).
- Children, elderly, and infirmed users of the Vansville Recreation Center (located approximately 1,500 feet north of the Project Site).
- Elderly or infirm employees who may work in the approximately 61 BARC facilities west, south, and east of the Project Site in the ROI.

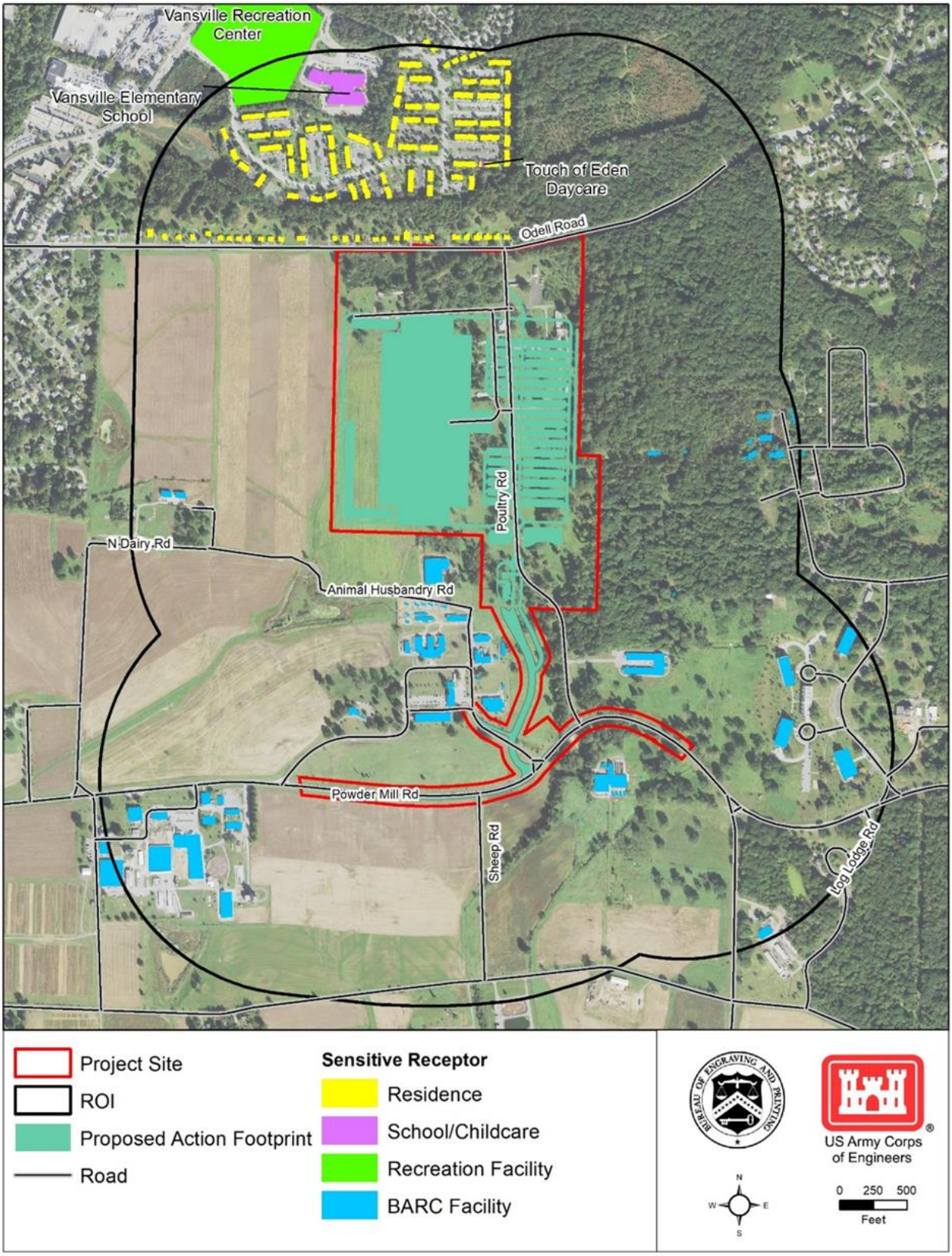


Figure 3.4-2: Potential Air Quality Sensitive Receptors

For additional information on human receptors in the ROI and region, as well as EJ populations, please refer to **Section 3.12**.

3.4.2 Environmental Effects

This section summarizes the potential impacts to air quality within the ROI that would occur under the Proposed Action (i.e., Preferred Alternative) and the No Action Alternative. The reader is referred to the ***Air Quality Technical Memorandum*** for a complete discussion of potential environmental effects.

Treasury developed preliminary, conservative Proposed Action emission projections for all criteria pollutants (except for Pb, as the Proposed Action would not emit Pb), fugitive dust, HAPs, and GHGs to support this impact analysis. These projections are based on conservative assumptions and best available data. While these projections provide a framework for potential impact analysis, they are subject to change based on the final design of the proposed CPF during the final design and permitting phases.

As noted previously, air quality permitting is conducted based on a facility's PTE emissions, despite these values typically being substantially greater than the facility's actual emissions. In accordance with this methodology, Treasury estimated conservative PTE emissions for the construction phase of the Proposed Action. However, since the Proposed Action is still in the early conceptual design process and includes various uncertainties regarding its operational capacity, Treasury determined that developing PTE emissions estimates for operation of the proposed CPF at this stage would be premature as various factors could change between the conceptual design phase and the permitting phase that would substantively change the results. Therefore, instead of PTE emissions estimates, Treasury developed "projected actual" emission estimates on which to base the operational impact analysis. These projected actuals reflect the emissions that Treasury conservatively anticipates the proposed CPF to actually generate based on its best available data, including historical consumption data from the BEP's other facilities.

To analyze the potential impacts of the proposed CPF, Treasury compares these projected actual emissions from the proposed CPF to the historical emissions data for the DC Facility under existing conditions.

Additionally, because this is a federal Proposed Action in a non-attainment and maintenance area, Treasury completed a General Conformity Analysis. For the purposes of the General Conformity Analysis, Treasury compared projected criteria pollutant emissions to the applicable *de minimis*[6] levels specified in Maryland's federally enforceable State Implementation Plan (SIP): 25 tpy for VOCs and NO_x, and 100 tpy for each other criteria pollutant. Although the conformity analysis is required only for non-attainment or maintenance area pollutants (i.e., O_3 in Prince George's County), the tables present emissions from all pollutants and compares the values with the ***de minimis*** levels (major source thresholds).

Treasury also compared projected actual HAP emissions for stationary sources to applicable major source thresholds specified in 40 CFR 70.2: 10 tpy for a single HAP or 25 tpy for any combination of HAPs.

3.4.2.1 No Action Alternative

Under the No Action Alternative, Treasury would not construct or operate the Proposed Action at BARC. Treasury would continue to operate the existing DC Facility and the WCF as under current conditions in compliance with air quality regulations. The Project Site would remain in its current condition. This would not result in the generation of new air pollutant emissions or result in a reduction of existing emissions. Therefore, the No Action Alternative would have ***no impact*** on air quality.

[6] *De minimis* levels are minimum thresholds for criteria pollutants in non-attainment and maintenance areas.

3.4.2.2 Preferred Alternative

Criteria Pollutant Emissions

Construction annual criteria pollutant PTE emissions from the Proposed Action would be below applicable *de minimis* thresholds (see **Table 3.4-2**). Therefore, a formal General Conformity Determination would not be required for the construction phase.

Table 3.4-2: Projected PTE Annual Criteria Pollutant Emissions During Construction

Emission Source	Projected PTE Emissions (tpy)						*De minimis* Threshold
	CO	NO_x	VOCs	PM_{10}	$PM_{2.5}$	SO_2	
Demolition and Site Preparation – 2021	6.67	9.73	1.80	2.82	2.79	0.01	**100 tpy for any one criteria pollutant, except for VOCs and NOx, which is 25 tpy**
Demolition and Site Preparation – 2022	5.01	9.35	1.39	2.74	2.72	0.01	
Construction – 2023	14.03	19.06	3.46	2.00	1.94	0.02	
Construction – 2024	14.04	19.02	3.45	2.01	1.95	0.02	
Construction – 2025	12.66	13.78	2.90	1.80	1.75	0.01	

Table 3.4-3 shows the projected actual criteria pollutant emissions that the Proposed Action would generate during operation[7]. As the proposed CPF is phased into operation, its criteria pollutant emissions would increase proportionately. Concurrently, the DC Facility would phase out operations, and its criteria pollutant emissions would decrease proportionately.

Table 3.4-3: Projected Actual Annual Criteria Pollutant Emissions During Operation

Emission Source	Projected Actual Emissions (tpy)						*De minimis* and Major Source Threshold
	CO	NO_x	VOCs	PM_{10}	$PM_{2.5}$	SO_2	
Operation – 2026	12.76	11.24	4.60	1.06	1.06	0.04	**100 tpy for any one criteria pollutant, except for VOCs and NOx, which is 25 tpy**
Operation – 2027	12.80	11.24	8.75	1.64	1.64	0.04	
Operation – 2028	12.84	11.24	12.9	2.23	2.23	0.04	
Annual Operations (full operation)	12.88	11.25	17.06	2.81	2.81	0.04	

At the AQCR level, projected actual VOC emissions from the proposed CPF would be lower than those emitted from the DC Facility under existing conditions (see **Table 3.4-1**) due to improved controls and efficiencies. Therefore, the Proposed Action would have a ***beneficial impact*** on air quality relative to VOC emissions. Emissions of all other criteria pollutants would increase relative to the DC Facility, but remain below applicable major source thresholds, resulting in ***less-than-significant adverse impacts*** to the ROI. Near the Project Site (i.e., within 1,500 feet of the proposed CPF), VOC and other criteria pollutant emissions would increase under the Proposed Action, but required construction permits obtained for the emission sources would be in accordance with the Maryland SIP; therefore, any adverse impacts from these emissions would be ***less-than-significant***.

As identified in **Section 2.2.4** and as part of the Proposed Action, Treasury would obtain and maintain the appropriate permits from MDE for CPF operation (MDE, 2019a). Treasury anticipates that the proposed

[7] As noted previously, Treasury calculated preliminary projected actual emissions using conservative assumptions based on best available data. These values do not reflect the maximum possible emissions (i.e., PTE emissions) that are used for permitting, and are subject to change as the design of the proposed CPF progresses.

CPF would be a minor source of criteria pollutants and that a General Conformity Determination would not be required. However, during the final design and permitting phases, Treasury would calculate PTE emissions for the proposed CPF. If at that time Treasury determines that criteria pollutant emissions (namely, for VOCs and/or NO_x) could exceed major source thresholds, then the proposed CPF would be permitted as a major source. The major source permitting process includes several stringent requirements, including obtaining emissions offset credits, meeting lowest achievable emissions rates, and performing alternative site analyses, that would ensure Treasury abides by General Conformity requirements and maintains potential adverse air quality impacts at less-than-significant levels. Treasury would also be required to obtain a Title V operating permit, in coordination with the MDE, for the proposed CPF if it becomes a major source. Treasury would decide on the specific emission controls and treatments in coordination with the MDE during the permitting stage, and would also adhere to other applicable federal and state regulations.

Fugitive Dust Emissions

Fugitive dust emissions would be likely to occur during construction of the proposed CPF. Proposed construction PM emissions would be substantially lower than the *de minimis* threshold. Fugitive dust, however, would be the most likely emission source to travel off-site and potentially affect sensitive receptors near the Project Site (see **Figure 3.4-2**) during construction activities. Implementation of the EPMs identified in **Section 2.2.4** would minimize these emissions. Therefore, a ***less-than-significant adverse impact*** to local air quality would be anticipated from fugitive dust emissions during construction.

No fugitive dust emissions would be anticipated during operation of the proposed CPF. All areas of the site would be landscaped, have natural vegetation, or be covered with impervious surfaces; no areas of bare or exposed soil would be present. Therefore, ***no impacts*** from fugitive dust emissions are expected during operation of the proposed CPF, including to sensitive receptors.

Toxic and Hazardous Air Pollutant Emissions

HAP emissions associated with construction of the Proposed Action could occur, but would be ***negligible*** when compared to regional HAP emissions. HAPs emitted during construction would not meet or exceed major source thresholds.

As with criteria pollutants, the proposed CPF's operational HAP emissions would increase as the facility phases into operation, and the DC Facility's HAP emissions (see **Table 3.4-1**) would decrease as the DC Facility phases out of operation. Emission levels of individual and combined HAPs during operation of the proposed CPF would be *substantially less* than the major source thresholds. While combined HAP emissions would be greater than those from the DC Facility under existing conditions, they would still be very low overall, and chromium and nickel HAP emissions would be eliminated entirely. Treasury would also complete a TAPs analysis during the final design and permitting phase of the Proposed Action to ensure TAPs emissions remain below state screening limits. Based on the calculated air emission levels and compliance with applicable emission and work practice standards, the impacts of HAP and TAP emissions would be ***less than significant***.

Greenhouse Gas Emissions and Climate Change

The Proposed Action's GHG emissions would be ***minor*** relative to the amount emitted in the state of Maryland in 2017. While the eventual termination of currency-printing operations at the DC Facility would *decrease* the DC Facility's annual GHG emissions in the long-term, they would be *offset* by GHG emissions from a new similar facility in the same region (i.e., the proposed CPF). Therefore, GHG emissions from the proposed CPF ***would not have a perceptible impact*** on a regional level. In reality, GHG emissions from the proposed CPF would likely be lower than those for the DC Facility under existing conditions, as the proposed CPF would be designed to a Silver LEED rating and would potentially include renewable energy

systems (e.g., solar panels). The Proposed Action would also reduce the BEP's federal footprint in the NCR by up to approximately 30 percent.

Privately owned vehicles (POVs) driven by commuting workers and delivery trucks would merely change their destination (i.e., from the DC or Landover, Maryland Facility to the proposed CPF) and would operate within the same ROI as the DC Facility. However, operation of the proposed CPF could reduce delivery truck numbers when compared to operation of the DC Facility as trips to and from the Landover facility would be eliminated. Overall, GHGs from these vehicles would not be "new" regional GHG emission sources and the relocation of employees and their vehicles within the NCR would ***not result in a perceptible change*** in regional GHG emissions. As such, the Proposed Action would ***not have any noticeable regional impact*** on GHG emissions or climate change.

Sensitive Receptors

As shown in **Figure 3.4-2**, there are 485 sensitive receptors within 1,500 feet of the Project Site. Based on the analysis presented in the ***Air Quality Technical Memorandum*** and summarized above***, less-than-significant adverse impacts*** to these sensitive receptors could occur from fugitive dust emissions during construction and criteria pollutant/HAP emissions during operation of the Proposed Action; however, with implementation of the EPMs and RCMs identified in **Section 2.2.4**, these emissions would generally remain substantially lower than applicable thresholds and imperceptible to sensitive receptors.

3.4.3 Mitigation Measures

No project-specific mitigation measures are recommended.

3.5 Noise

This section describes the existing acoustic environment in the Proposed Action's ROI and potential noise impacts from the Proposed Action (i.e., Preferred Alternative) and No Action Alternative. Measures to reduce potential adverse noise effects from the Proposed Action are identified. Concerns expressed during public scoping regarding noise are considered and addressed. The reader is referred to the ***Noise Technical Memorandum*** for additional, more detailed information related to the data presented in each of the following sections.

3.5.1 Affected Environment

3.5.1.1 Region of Influence

The noise ROI includes the Project Site and areas within 1,500 feet of the Project Site (see **Figure 3.5-1**). These are the areas that could experience noise effects from the Proposed Action during either the construction or operation phase. Beyond 1,500 feet from the Project Site, noise generated during construction of the proposed CPF would be expected to attenuate to ambient levels and would not be noticeable. Operational noise from the proposed CPF would be anticipated to attenuate to ambient levels at approximately 800 feet.

3.5.1.2 Applicable Guidance

There are two noise regulations that apply to the Proposed Action: the Noise Control Act of 1972 (42 USC 4901) and the Prince George's County Noise Ordinance (Prince George's County Code, Subtitle 19, Division 2) (Prince George's County, 2019). Collectively, these regulations restrict construction activities to daytime hours with a maximum noise limit of 75 A-weighted decibels (dBA) without a noise-suppression plan and 85 dBA with an approved noise-suppression plan. Operational noise is similarly restricted.

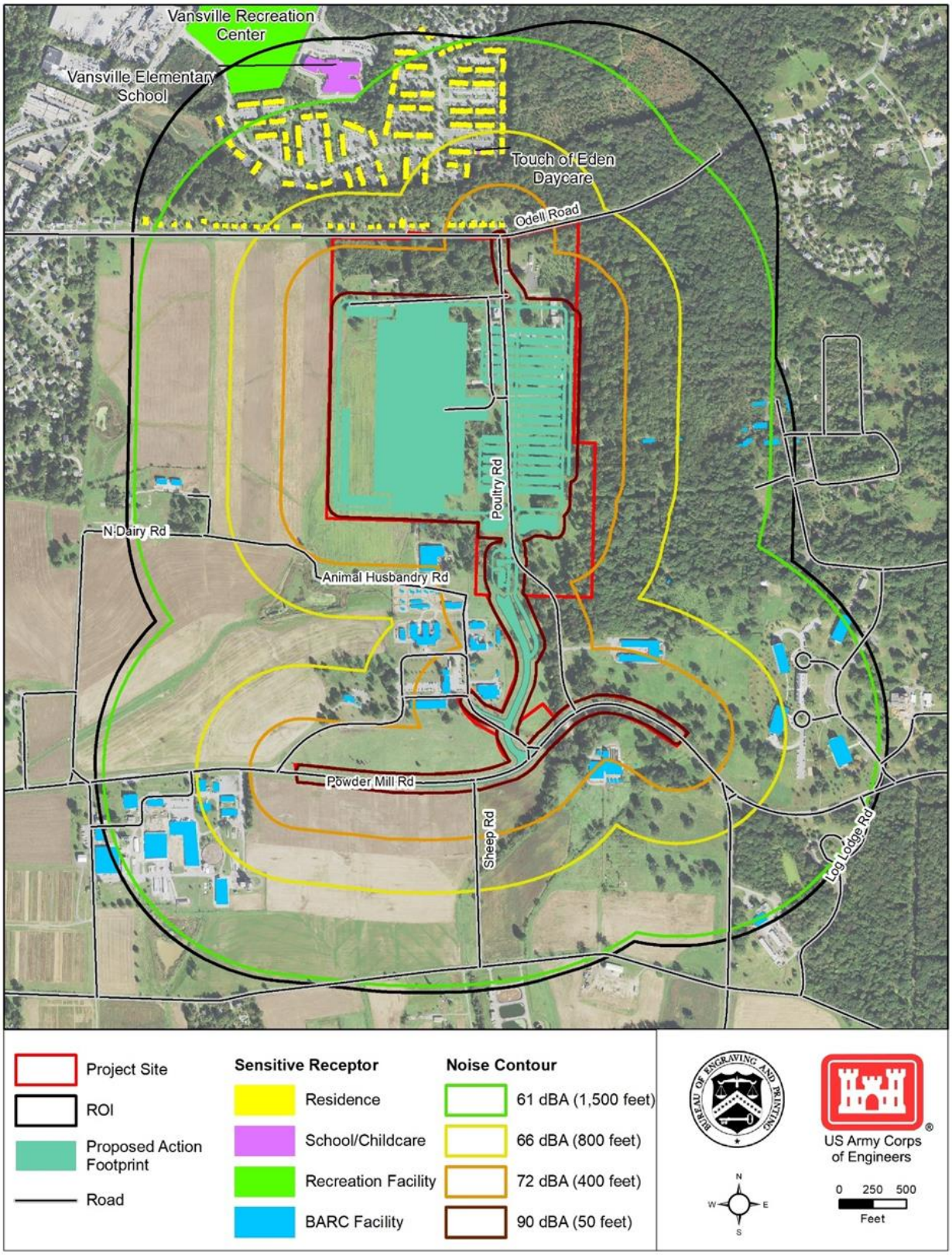


Figure 3.5-1: Noise ROI and Proposed Construction Noise Contours

3.5.1.3 Existing Conditions

The Project Site does not have any substantial existing sources of man-made noise, other than occasional vehicle traffic and landscaping equipment that are not discernable from ambient levels. Wildlife noise sources are present, but are also not discernable from ambient levels.

The ROI is predominantly semi-rural/suburban with neighborhoods to the north, east, and west of the Project Site. Agricultural land associated with BARC is to the south (see **Figure 3.5-1**). Existing sources of noise within the ROI include vehicle traffic (including, notably, noise from rumble strips on Powder Mill Road that has generated complaints from both BARC employees and the community), farm equipment at BARC, and other noises typically generated in a semi-rural/suburban area.

As shown in **Figure 3.5-1**, there are 485 noise-sensitive receptors located within the ROI. These noise-sensitive receptors are primarily located in the northern and southern portions of the ROI. They include residences along Odell Road and in the Vansville community, active BARC buildings, the Vansville Recreation Center, Vansville Elementary School, and the Touch of Eden Daycare. The Vansville Recreation Center and Vansville Elementary School are approximately 1,500 feet from the Project Site boundary; the Touch of Eden Daycare is approximately 1,300 feet from the boundary. The closest public (non-BARC) receptor to the Project Site is a residence along Odell Road located approximately 35 feet north of the Project Site boundary. There are no noise-sensitive receptors on the Project Site.

3.5.2 Environmental Effects

This section summarizes the potential noise impacts within the ROI that would occur under the Proposed Action (i.e., Preferred Alternative) and the No Action Alternative. The reader is referred to the ***Noise Technical Memorandum*** for a complete discussion of potential environmental effects.

3.5.2.1 No Action Alternative

Under the No Action Alternative, Treasury would not construct or operate the Proposed Action. Treasury would continue to operate out of the DC Facility; these current conditions generate no noise complaints. The Project Site would remain in its current condition. Existing ambient noise conditions in the ROI would continue. Therefore, the No Action Alternative would have ***no impact*** on noise.

3.5.2.2 Preferred Alternative

The Proposed Action would cause short-term, ***less-than-significant adverse*** noise increases in the ROI during construction.

During a normal daytime construction shift, the estimated maximum sound levels experienced by noise-sensitive receptors within the ROI would be below 75 dBA (see **Table 3.5-1**)[8]. However, as shown in **Figure 3.5-1**, six residences along Odell Road could potentially experience noise levels between 72 and 90 dBA for approximately 1 to 2 weeks during re-construction of the northern segment of Poultry Road. Four BARC facilities immediately south of the Project Site could also experience noise levels between 72 and 90 dBA while the proposed entrance road is being constructed. With implementation of the EPMs identified in **Section 2.2.4**, construction noise, including from on-site construction activities and associated construction vehicle and truck traffic, would be maintained at ***less-than-significant adverse levels***, including for sensitive receptors in the ROI.

[8] Actual noise levels experienced by noise-sensitive receptors in the ROI, particularly those north, northwest, and east of the Project Site, would likely be lower than the levels indicated in **Table 3.5-1** as retained vegetation (e.g., the forested conservation easements) and topography would help to block the noise.

The Proposed Action would also result in operational noise increases in the ROI. With implementation of the EPMs identified in **Section 2.2.4**, operational noise, including from on-site permanent equipment and daytime operational vehicle and truck traffic, would have a ***negligible adverse impact*** on noise in the ROI.

Table 3.5-1: Estimated Noise Levels at Various Distances from Construction Activities

Noise-Sensitive Receptor Type	Name or Location (# of resources)	Approximate Distance from Proposed Construction Activities (feet)	Noise Level (dBA)
School / Childcare	Touch of Eden Daycare	1,300	72 - 66
	Vansville Elementary School	1,500	60
Recreational Facility	Vansville Recreation Center	1,500	60
Residence	Along Odell Road (28)	500[1] - 1,500	90 - 60
	Vansville (~393)	800 - 1,500	66 - 60
BARC Facility	All BARC facilities within the ROI (~61)	50 - 1,500	90 - 60

1. Re-construction of the northern segment of Poultry Road between the proposed CPF and Odell Road would likely take 1 to 2 weeks; during this time, construction activities would be as close as 35 feet from off-site residences.

Nighttime delivery shipments by trucks would be routed through BARC to avoid passing within 50 feet of any noise-sensitive receptors. Therefore, the noise-sensitive receptors around the site may experience ***less-than-significant adverse impacts*** from nighttime shipments due to audible, but not intrusive, truck noise at the proposed CPF.

Finally, as part of the Proposed Action, Treasury would remove the rumble strips along Powder Mill Road within the Project Site, thereby reducing vehicle noise on Powder Mill Road during both day and night. This would constitute a ***beneficial impact*** to nearby noise-sensitive receptors.

3.5.3 Mitigation Measures

No project-specific mitigation measures are recommended.

3.6 Geology, Topography, and Soils

This section describes the geologic, topographic, and soil resources in the Proposed Action's ROI and potential impacts on these resources from the Proposed Action (i.e., Preferred Alternative) and No Action Alternative. Measures to reduce potential adverse effects on these resources from the Proposed Action are also identified. Concerns expressed during public scoping regarding these resources are considered and addressed. The reader is referred to the ***Geology, Topography, and Soils Technical Memorandum*** for additional, more detailed information related to the data presented in each of the following sections.

The following resources have **no potential** for impact under the Proposed Action and are not subject to further analysis herein: geology, topography, seismic hazards, landslides, and radon.

3.6.1 Affected Environment

3.6.1.1 Region of Influence

The ROI for geologic, topographic, and soil resources is the Project Site, as the Proposed Action would have no potential to affect these resources beyond the boundaries of the Project Site. As noted above, geologic and topographic resources are not discussed further.

3.6.1.2 Applicable Guidance

The primary regulations and guidance related to this analysis include The Farmland Protection Policy Act (FPPA), Maryland Erosion and Sediment Control Regulations, Maryland Standards and Specification for Soil Erosion and Sediment Control, Section 438 of the EISA, and EO 13508, *Chesapeake Bay Protection and Restoration*.

Under the FPPA, federal, state, and local agencies designate prime farmland, unique farmland, and farmland of statewide or local importance to minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to nonagricultural uses (USDA, 2009a; NRCS, n.d.)

Maryland Erosion and Sediment Control Regulations and Maryland Standards and Specification for Soil Erosion and Sediment Control collectively guide erosion control in the State of Maryland. These regulations require construction activities disturbing 1 or more acres of land to obtain coverage under the *General Permit for Stormwater Associated with Construction Activity*, and establish criteria for proper erosion and sediment control on construction sites. Section 438 of the EISA and EO 13508 also require stormwater management measures intended to reduce off-site adverse impacts from runoff.

3.6.1.3 Existing Conditions

Figure 3.6-1 shows the soils underlying the Project Site. On-site soils generally have a medium to high susceptibility to compaction, and approximately one-third of the soils have a moderate to high potential for erosion (>0.35 K-factor).

The Project Site contains approximately 59.3 acres of prime farmland and 27.2 acres of farmland of statewide importance (see **Figure 3.6-1**); however, only 9.5 acres of these soils are currently used for agriculture (i.e., row crops; see **Section 3.8**). The remaining portions of the Project Site with FPPA-designated soils consist of forest, open meadows, and, to a lesser extent, developed land (NRCS, 2020). The Project Site contains no unique farmland or farmland of local importance.

3.6.2 Environmental Effects

This section assesses potential impacts to soil resources within the ROI that could occur under the Proposed Action (i.e. Preferred Alternative) and the No Action Alternative. The reader is referred to the ***Geology, Topography, and Soils Technical Memorandum*** for a complete discussion of potential effects.

3.6.2.1 No Action Alternative

Under the No Action Alternative, Treasury would not construct or operate the Proposed Action. The existing soil resources in the ROI would remain the same. Therefore, the No Action Alternative would have ***no impact*** on these resources.

3.6.2.2 Preferred Alternative

Construction

The construction LOD of the proposed CPF includes approximately 100.3 acres, or 82.1 percent, of the Project Site (see **Figure 3.6-1**). Under the Preferred Alternative, existing vegetation would be removed within the LOD, rendering soils exposed and more susceptible to erosion. Soils in the LOD could also be compacted from use of heavy equipment during construction. Implementation of the EPMs and RCMs identified in **Section 2.2.4**, however, would minimize or eliminate these potential impacts, resulting in ***no or negligible adverse impacts*** to soils.

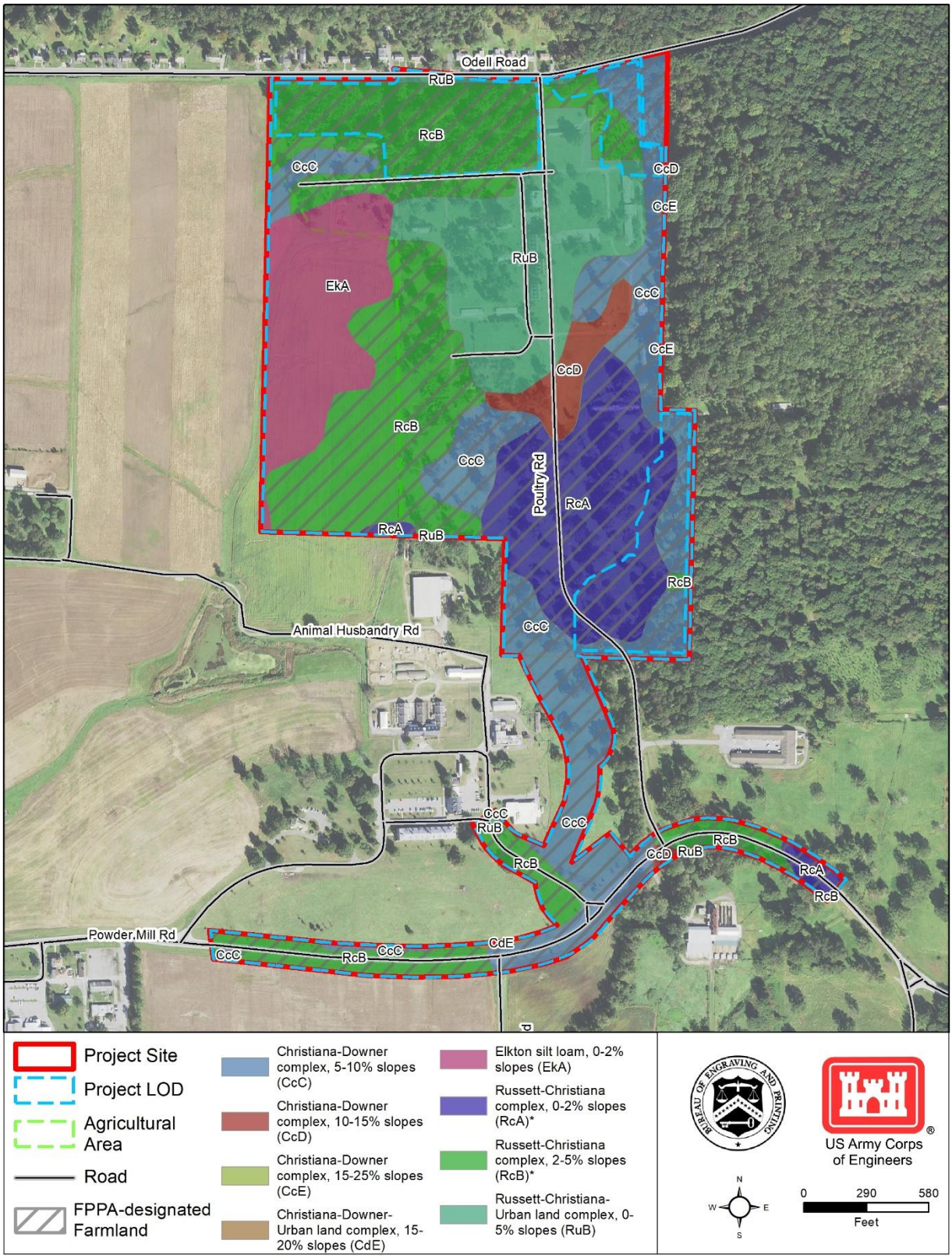


Figure 3.6-1: Project Site Soils

Operation

Once constructed, the Proposed Action would increase impervious surface cover on the Project Site from 17.3 to 46.7 acres (or by 29.4 acres), comprising 38.2 percent of the Project Site. Additional impervious surfaces would increase stormwater runoff from the Project Site and the potential for soil erosion and sedimentation in receiving waterbodies.

Treasury, however, would incorporate stormwater management features and practices into the design of the proposed CPF in compliance with Section 438 of the EISA and EO 13508. 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**). Further, Treasury would revegetate all pervious surfaces disturbed during construction of the Preferred Alternative; no exposed soil would remain on the Project Site. With implementation of these measures, operation of the Proposed Action would result in ***no or negligible adverse impacts*** to soils.

The Preferred Alternative would directly impact approximately 65.3 acres of FPPA-designated farmland soils due to ground disturbance and conversion to developed uses. Further, approximately 21.2 acres of FPPA-designated farmland soils would also be indirectly impacted within the Project Site, outside of the construction LOD, because they would be rendered nonfarmable due to access restrictions within Treasury's secure facility during operation.

Treasury completed a Farmland Conversion Impact Rating Form (USDA Form AD-1006) in consultation with the Natural Resources Conservation Service (NRCS) to determine the overall potential impact to FPPA-designated soils. The Proposed Action received a site assessment score of 114. As this score is below 160, no further consideration for farmland conservation is required. Please refer to the ***Geology, Topography, and Soils Technical Memorandum*** for NRCS consultation documentation.

Finally, the state of Maryland, Prince George's County, and the NCPC have established policies and goals to prioritize preservation of existing agricultural land, including BARC specifically, for land use and open space values. Treasury's consideration of these plans, policies, and goals are addressed in **Section 3.2**.

3.6.3 Mitigation Measures

No project-specific mitigation measures are recommended.

3.7 Water Resources

This section describes the water resources in the Proposed Action's ROI and potential impacts on these resources from the Proposed Action (i.e., Preferred Alternative) and No Action Alternative. Measures to reduce potential adverse impacts on water resources from the Proposed Action are identified. Concerns expressed during public scoping regarding water resources are considered and addressed. The reader is referred to the ***Water Resources Technical Memorandum*** for additional, more detailed information related to the data presented here.

Two water resources, floodplains and Chesapeake Bay Critical Areas, are not located within the Project Site and have no potential to be impacted by the Proposed Action.

3.7.1 Affected Environment

3.7.1.1 Region of Influence

The ROI for water resources consists of surface water features, including wetlands, and groundwater located within and receiving drainage down-gradient from the Project Site. These primarily include on-site water resources; Indian Creek and Beaverdam Creek, both perennial streams that ultimately receive runoff from the Project Site, and their tributaries; and areas down-gradient from the Project Site where groundwater is presumed to flow to the southwest (see **Figure 3.7-1**) (USACE, 2020a).

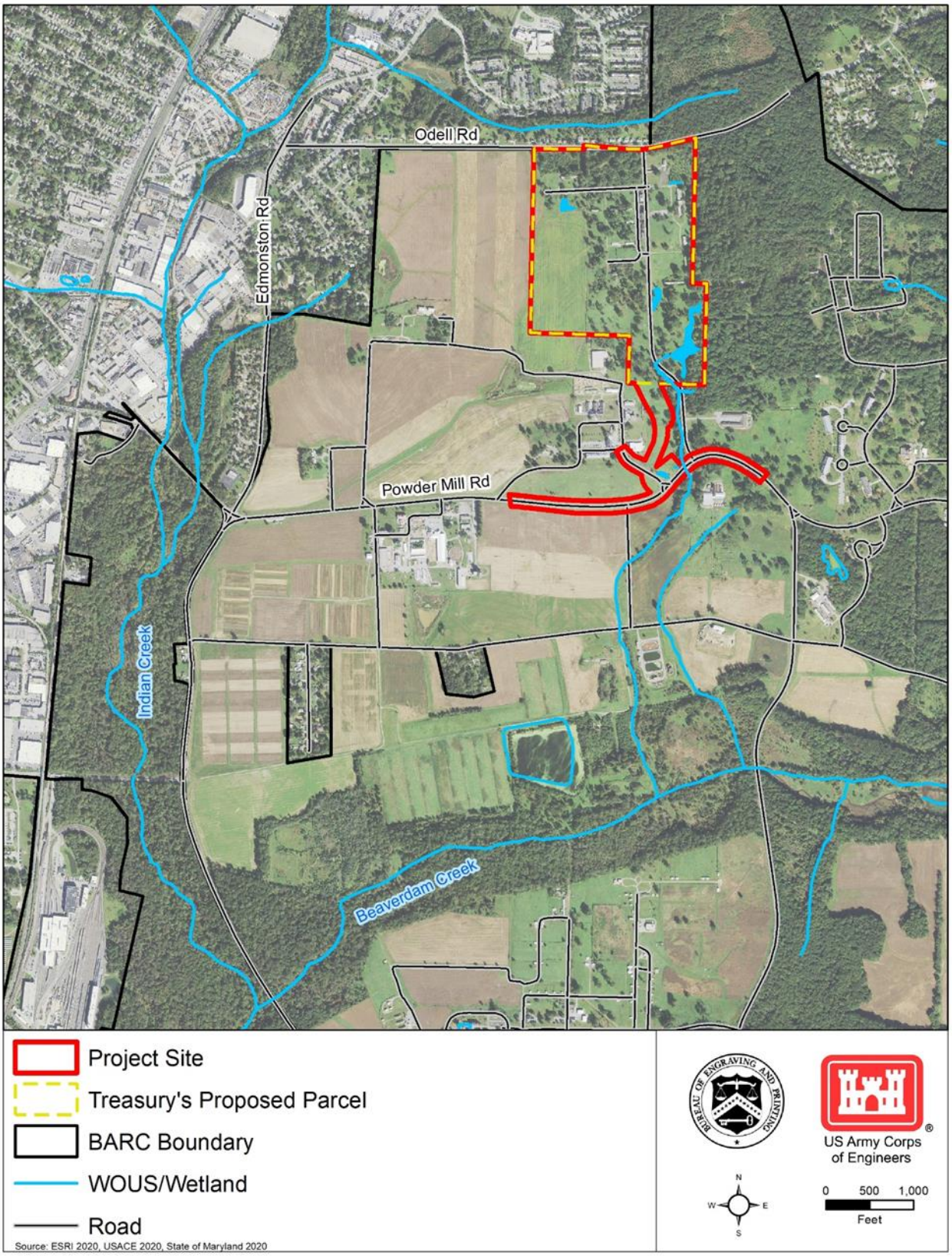


Figure 3.7-1: Water Resources ROI

3.7.1.1 Applicable Guidance

Treasury would comply with all federal and state laws and regulations relating to water resources while constructing and operating the Proposed Action. Please refer to the ***Water Resources Technical Memorandum*** for a complete list of applicable laws and regulations relevant to water resources.

3.7.1.2 Existing Conditions

Surface Waters and Water Quality

Surface waters[9] within the ROI generally drain from the northeast to the southwest (USACE, 2020c). There are two surface waters within the Project Site, both of which are unnamed intermittent streams (see **Figure 3.7-2**):

- The first is located in the southern portion of Treasury's proposed parcel (USACE, 2020c). This stream receives drainage from the southern approximately 40 percent of the proposed parcel and flows south between the existing Poultry Road and the proposed entrance road. This intermittent stream is also located within the Project Site where it passes through a culvert under Powder Mill Road, and continues south to Beaverdam Creek (USACE, 2020d).
- The second unnamed intermittent stream is located within the Project Site south of Treasury's proposed parcel. It flows southeast from Wetland 8 under Powder Mill Road to the above-referenced unnamed intermittent stream (USACE, 2020d).

Beaverdam Creek and Indian Creek were historically listed as impaired by the state of Maryland under CWA Section 303(d)[10]; however, the MDE established TMDLs[11] to address pollutants in these streams, and subsequently removed these streams from the Section 303(d) list of impaired streams in 2008 (MDE, 2018). Beaverdam Creek is currently designated as a Tier II water, indicating that its quality is substantially better than State minimum requirements, and is subject to antidegradation requirements described in Code of Maryland Regulation 26.08.02.04-1 (MDE, 2017). Beaverdam Creek also receives sanitary sewer discharge from the BARC East WWTP (see **Section 3.11**).

Indian Creek (and therefore Beaverdam Creek) discharges to the Anacostia River, which ultimately discharges to the Potomac River and Chesapeake Bay. The Anacostia Watershed is part of the greater Chesapeake Bay Watershed and is intensely developed with poor ecological conditions and degraded water quality. Water quality in the Chesapeake Bay has also historically been impacted by development. The USEPA established a Chesapeake Bay-wide TMDL in 2010 in response to the poor water quality; this TMDL also serves as a key commitment of federal strategy to protect and restore the Chesapeake Bay under EO 13508 (USEPA, 2019). Additionally, Prince George's County created a Watershed Implementation Plan (WIP) in 2011 in response. The 2018 Anacostia River Restoration Plan for Prince George's County includes target loads to both meet the Chesapeake Bay TMDL and improve water quality of the Anacostia River (USACE, 2018).

[9] USACE regulates the alteration of and discharges to surface waters under Section 404 of the CWA. Under Section 401 of the CWA, discharges to WOUS must comply with the state's Water Quality Standards (WQS).

[10] Maryland maintains a list of impaired waters (i.e., waters that do not meet the WQS) in accordance with Section 303(d) of the CWA and establishes TMDLs as needed to address pollutants in impaired waters (MDE, 2019c).

[11] A TMDL is the maximum amount of a pollutant that a waterbody can receive while still meeting applicable WQS.

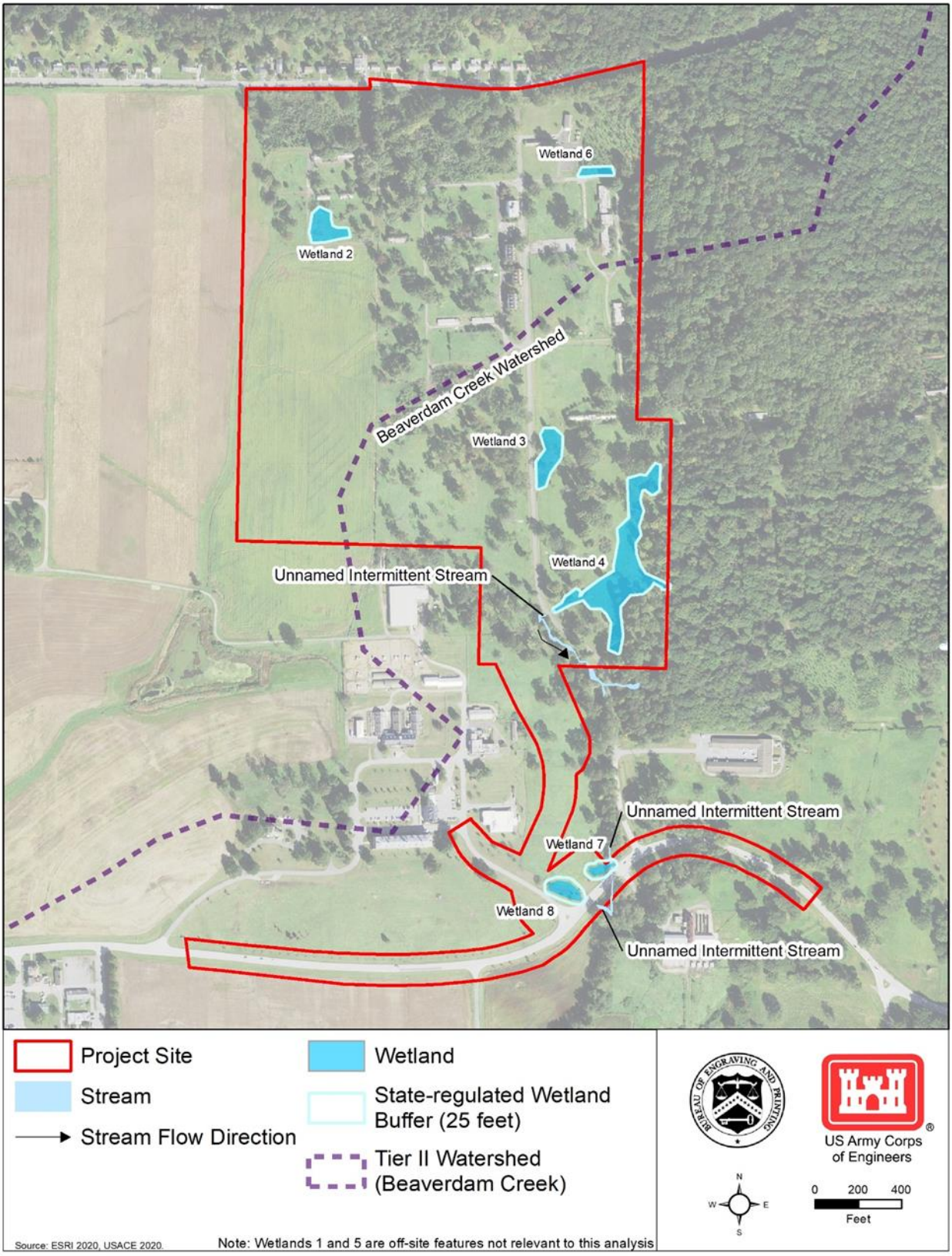


Figure 3.7-2: Surface Waters on the Project Site

Stormwater

Stormwater[12] is conveyed across the Project Site and within the ROI primarily to the west, southwest, and south, following topography (see the ***Geography, Topography, and Soils Technical Memorandum***) and existing stormwater management infrastructure. Approximately 51 percent of the Project Site drains to Indian Creek, while 49 percent drains to the two unnamed intermittent streams in the southern portion of the Project Site, which flow to Beaverdam Creek.

The Project Site is largely vegetated (see **Section 3.8**); it currently contains 17.3 acres of impervious surfaces (i.e., 14.2 percent of the site) from existing roads and buildings.

Federal projects and operations are subject to stormwater management guidelines and requirements. These primarily include the NPDES permit program, the EISA (42 USC 17094 et seq.), and, within the Chesapeake Bay Watershed, EO 13508. The USDA operations at BARC are currently permitted under a NPDES MS4 Phase II General Permit that establishes minimum control measures to manage stormwater on BARC. Further, construction activities disturbing 1 acre or more of land are required to obtain coverage under MDE's *General Permit for Stormwater Associated with Construction Activity*, which requires the project proponent to prepare an NOI and ESCP.

Section 438 of the EISA directs federal agencies to incorporate stormwater management designs (i.e., GI/LID features) in development projects; no GI/LID features are present within the Project Site.

Wetlands

Wetlands[13] at BARC are associated with storm drainage channels, ponds, maintained open space, and backwater areas. Overall, BARC contains approximately 815 acres of wetlands (USDA, 1996). As shown on **Figure 3.7-2**, USACE delineated six palustrine wetlands[14], totaling 2.94 acres, on the Project Site (USACE, 2020c; USACE, 2020d). Treasury preliminarily determined that three of the six wetlands on the Project Site are isolated and not subject to USACE regulation under CWA Section 404. These wetlands are still subject to MDE regulation at the state level. Generally, if total impacts on isolated, nontidal wetlands are less than 1 acre (e.g., only 0.81 acre of these wetlands occur on the Project Site), mitigation is not required (MDE, 2020). Treasury preliminarily determined Wetland 4, the largest on-site wetland (1.95 acres), and Wetlands 7 and 8 to be jurisdictional wetlands subject to regulation under CWA Section 404 (USACE, 2020c; USACE, 2020d).

MDE also regulates a 25-foot buffer around all nontidal wetlands; there is approximately 1.20 acre of wetland buffer on the Project Site.

Groundwater and Water Quality

There is no sole-source aquifer within a 10-mile radius of the Project Site (USEPA, 2020). Regional groundwater[15] aquifers flow to the southeast, although shallow groundwater on-site flows down-gradient to the southwest (USACE, 2020a; USACE, 2020b). An unconfined portion of the Patuxent aquifer, within the

[12] Stormwater is generated from rainfall or storm events and flows into surface water bodies or recharges groundwater. The velocity and volume of stormwater generally increase in proportion to the amount of impervious surfaces and compacted soils present within the drainage area. Stormwater runoff can accumulate pollutants and debris as it flows across the land surface and may also result in increased erosion and sedimentation of receiving surface water bodies.

[13] Wetlands generally include swamps, marshes, bogs, and similar areas (33 CFR 328.3). 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, including providing hunting and recreation areas.

[14] Palustrine wetlands are non-tidal wetlands characterized by trees, shrubs, and emergent vegetation (Cowardin, Carter, Golet, & LaRoe, 1979).

[15] Groundwater is water stored beneath the ground surface in soil and geological formations.

Patuxent Formation, recharges in the western portions of BARC (USACE, 2020b). The USDA pumps water from this aquifer under unconfined water table conditions and uses the water for various purposes throughout BARC (USDA, 2011). No USDA pumps or wells are located on the Project Site.

Several testing wells installed on the Project Site in October 2019 during a Phase II Environmental Site Assessment (ESA) either did not encounter groundwater or were slow to recharge following sampling. The average depth to groundwater in testing wells at the Project Site was 10.3 feet (USACE, 2020b). During the Phase II ESA, USACE identified concentrations of arsenic, chromium, lead, cyanide, and VOCs that could impact groundwater quality. The levels of these contaminants, however, are either below maximum contaminant levels (MCLs)[16] or otherwise consistent with natural background levels for the ROI (USACE, 2020b).

Maryland's Coastal Zone

Maryland's coastal zone includes all of Prince George's County, including the Project Site. As a federally owned property, BARC is statutorily excluded from the state's coastal zone. In accordance with the Coastal Zone Management Act (CZMA) of 1972 (16 USC 1451 *et seq.*), however, federal actions that have the potential to affect coastal zone resources must be consistent, to the maximum extent practicable, with the state's enforceable coastal zone policies. Because the Proposed Action would have the potential to affect Maryland's coastal zone resources, Treasury is required to determine the Proposed Action's consistency with the enforceable policies of the Maryland Coastal Zone Management Program (CZMP).

3.7.2 Environmental Effects

This section analyzes the potential impacts to water resources within the ROI that could occur under the Proposed Action (i.e., Preferred Alternative) and the No Action Alternative. The reader is referred to the ***Water Resources Technical Memorandum*** for a complete discussion of potential effects.

3.7.2.1 No Action Alternative

Under the No Action Alternative, Treasury would not construct or operate the Proposed Action. Water resources within the ROI would not change due to Treasury's proposed activities. Ongoing stormwater infiltration, groundwater recharge, and WOUS acreages and functions would continue. Therefore, the No Action Alternative would have ***no impact*** on water resources.

3.7.2.2 Preferred Alternative

Surface Waters and Water Quality (excluding Wetlands)

Construction

Construction of the Proposed Action would divert approximately 117 linear feet of the delineated intermittent stream in the southern portion of Treasury's proposed parcel to avoid the proposed entrance road and the proposed vehicle entry control facility (see **Figure 3.7-3**); Treasury would likely relocate this portion of the stream to the east of the proposed development. Diversion of the intermittent stream on the proposed parcel would result in a small permanent impact to this resource, but would not permanently impede this stream segment or its connection to other WOUS. It would not be impacted during the Powder Mill Road modifications as no changes are proposed to the existing water crossing in that location.

[16] MCLs are standards set by the USEPA for drinking water quality under the Safe Drinking Water Act.

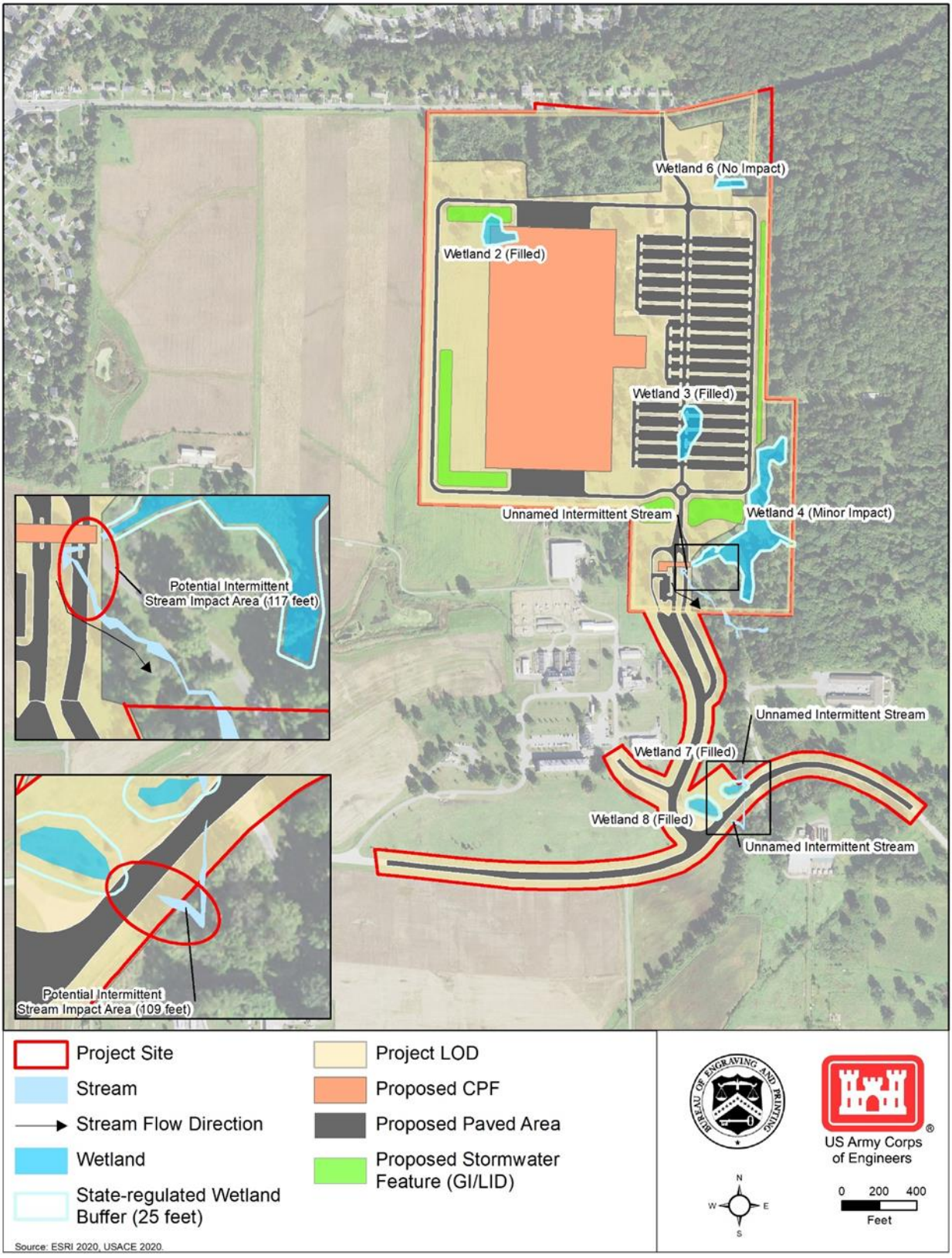


Figure 3.7-3: Potentially Impacted Water Bodies and Proposed Stormwater Infrastructure

Construction of the Proposed Action would also fill, and not replace, approximately 109 linear feet of the second on-site intermittent stream (see **Figure 3.7-3**). In total, approximately 226 linear feet of stream within the Project site would be impacted, resulting in a ***potentially significant adverse impact***. Treasury would minimize these potential impacts through compliance with Sections 404/401 of the CWA and implementation of EPMs (see **Section 2.2.4**).

Construction-related ground disturbance could increase on- and off-site soil erosion and sedimentation that could impact surface waters in the ROI. Compliance with NPDES permit requirements (e.g., use of silt fences and sediment traps), however, would minimize or eliminate these potential impacts, resulting in ***no or negligible adverse impacts***.

Operation

Operation of the proposed CPF would produce approximately 120,000 gallons per day (gpd) of wastewater that would be treated at the BARC East WWTP and discharged to nearby surface waters (see **Section 3.11**). The WWTP, which has sufficient existing permitted capacity to treat both existing and planned future wastewater at BARC, as well as the anticipated volume of wastewater from the Proposed Action, would continue to comply with existing permit requirements and established TMDLs for the receiving waterbody. Therefore, 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.

Operation of the proposed CPF would not involve water withdrawals, in-water work, or alteration of surface waterbodies. Thus, in the long term, the Proposed Action would have ***no impacts*** to on-site surface waters.

Stormwater

Construction

Construction of the Proposed Action would disturb approximately 100.3 acres of land. Ground disturbance could increase on- and off-site soil erosion and sedimentation within the ROI from stormwater discharges. As noted above, compliance with NPDES permit requirements would minimize or eliminate these potential impacts, resulting in ***no or negligible adverse impacts*** (see **Section 2.2.4**).

Operation

Once constructed, 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 3.7-3**, 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. As such, ***no or negligible adverse impacts*** to stormwater would be expected (see **Section 2.2.4**).

Wetlands

Construction

Construction of the Proposed Action would fill Wetlands 2 and 3 (both isolated), totaling 0.73 acre; Wetlands 7 and 8 (both potentially jurisdictional), totaling 0.18 acre; and their MDE-regulated 25-foot nontidal wetland buffers (see **Figure 3.7-3**). Construction of the proposed security fence along the boundary of Treasury's

proposed parcel could also impact 0.03 acre of Wetland 4 (potentially jurisdictional). In total, the Proposed Action would impact 0.94 acre of wetlands within the Project Site (i.e., 0.11 percent of wetlands on BARC) and 0.65 acre of MDE-regulated nontidal wetland buffer.

Based on its alternatives analysis, Treasury has found that there is no practicable alternative to impacting wetlands through construction of the CPF; Treasury has developed the concept site plan for the CPF in a manner that reduces potential adverse wetland impacts to the extent feasible. Treasury prepared a Draft Finding of No Practicable Alternative for the Proposed Action in compliance with EO 11990 (see the ***Water Resources Technical Memorandum***).

As the Proposed Action would impact less than 1 acre of isolated, nontidal wetlands, Treasury would apply for an exemption from mitigation requirements for those wetlands under Maryland's Nontidal Wetlands Protection Program. Treasury would implement any required mitigation as directed by the MDE. Additionally, Treasury would comply with CWA Section 404/401 permitting requirements to address impacts to potentially jurisdictional wetlands. Therefore, potential impacts on wetlands from construction of the Proposed Action would be considered ***less-than-significant***.

Operation

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

Groundwater

Construction

Some proposed construction activities (i.e., foundation excavation and new utility corridors) could involve site excavation up to a depth of approximately 25 feet bgs. Demolition of existing buildings with basements could require excavations up to approximately 10 feet bgs; removal of existing underground utilities could require excavations up to 5 feet bgs. These excavation and demolition activities could intersect groundwater underlying the Project Site, and potentially mobilize contaminants in the soil or discharge other pollutants that may enter the surficial groundwater; regulated concentrations could potentially be exceeded. These impacts would be expected to be maintained at ***less-than-significant*** levels and further reduced through the measures identified in **Section 2.2.4**.

Operation

Once construction is complete, ***no impacts*** to groundwater quality would occur from the proposed CPF. Hazardous materials used or generated at the proposed CPF during production operations would be properly disposed of or stored (see **Section 3.13**). The Proposed Action would use water supplied by the Washington Suburban Sanitary Commission (WSSC) and the USDA (see **Section 3.11**). While demand for USDA groundwater withdrawals in the ROI may increase, such increases would be within the USDA's existing capacity and supplemental to WSSC's primary water supply. Therefore, ***negligible impacts*** on groundwater supply would occur during operation.

Coastal Zone

Treasury determined that the Proposed Action would be consistent, to the maximum extent practicable, with the enforceable policies of Maryland's CZMP (see the ***Water Resources Technical Memorandum***). As such, ***no adverse impacts*** to Maryland's coastal zone would occur.

3.7.3 Mitigation Measures

Treasury should implement the following project-specific mitigation measure to further reduce the potential for adverse impacts to water resources:

- As an alternative to diverting approximately 117 linear feet of the unnamed intermittent stream on-site, modify the LOD associated with proposed entrance road upgrades and the proposed vehicle entry control facility to avoid this stream.
- Conduct excavation activities at the Project Site when the groundwater table is seasonally lower (e.g., late summer or early fall) to minimize potential encounters with this resource.

3.8 Biological Resources

This section describes the biological resources in the Proposed Action's ROI and potential impacts on biological resources from the Proposed Action (i.e., Preferred Alternative) and No Action Alternative. Measures to reduce potential adverse impacts on biological resources are identified. Concerns expressed during public scoping regarding biological resources are considered and addressed. The reader is referred to the ***Biological Resources Technical Memorandum*** for additional, more detailed information related to the data presented here.

One special status species, the bald eagle (*Haliaeetus leucocephalus*), is not subject to further analysis as no suitable habitat for this species is present within the ROI.

3.8.1 Affected Environment

3.8.1.1 Region of Influence

The ROI for biological resources includes the Project Site and areas within 1,500 feet of the Project Site (see **Figure 3.8-1**). Beyond 1,500 feet from the Project Site, potential impacts on biological resources would not be anticipated, and proposed noise and light would attenuate to ambient levels (see **Section 3.5** and **Section 3.3**, respectively).

3.8.1.2 Applicable Guidance

Treasury would comply with all federal and state laws and regulations relating to biological resources while constructing and operating the Proposed Action. Please refer to the ***Biological Resources Technical Memorandum*** for a complete list of applicable laws and regulations relevant to biological resources.

3.8.1.3 Existing Conditions

Vegetation

Vegetation communities within the ROI are shown on **Figure 3.8-1** and quantified in **Table 3.8-1**. They include forested areas, open meadows with mature trees, agricultural areas, and developed areas.

In accordance with the MFCA, Treasury conducted a Forest Stand Delineation (FSD) and survey of specimen trees (e.g., trees 30 inches or greater in diameter at breast height) within the Project Site. The FSD identified four forest stands and 149 specimen trees within the Project Site, 10 of which are located within these forest stands, while the remaining 139 are scattered throughout the central and southern portions of the Project Site (see **Figure 3.8-1**). The Project Site also contains two existing forest conservation easements[17].

[17] A conservation easement is a legally binding agreement in which the landowner foregoes the right to develop the land while retaining full ownership (CBF, 2004). Conservation easements on the Project Site were established as a mitigation measure for the Intercounty Connector Project (Maryland Route 200) in 2014 (BEP, 2019b).

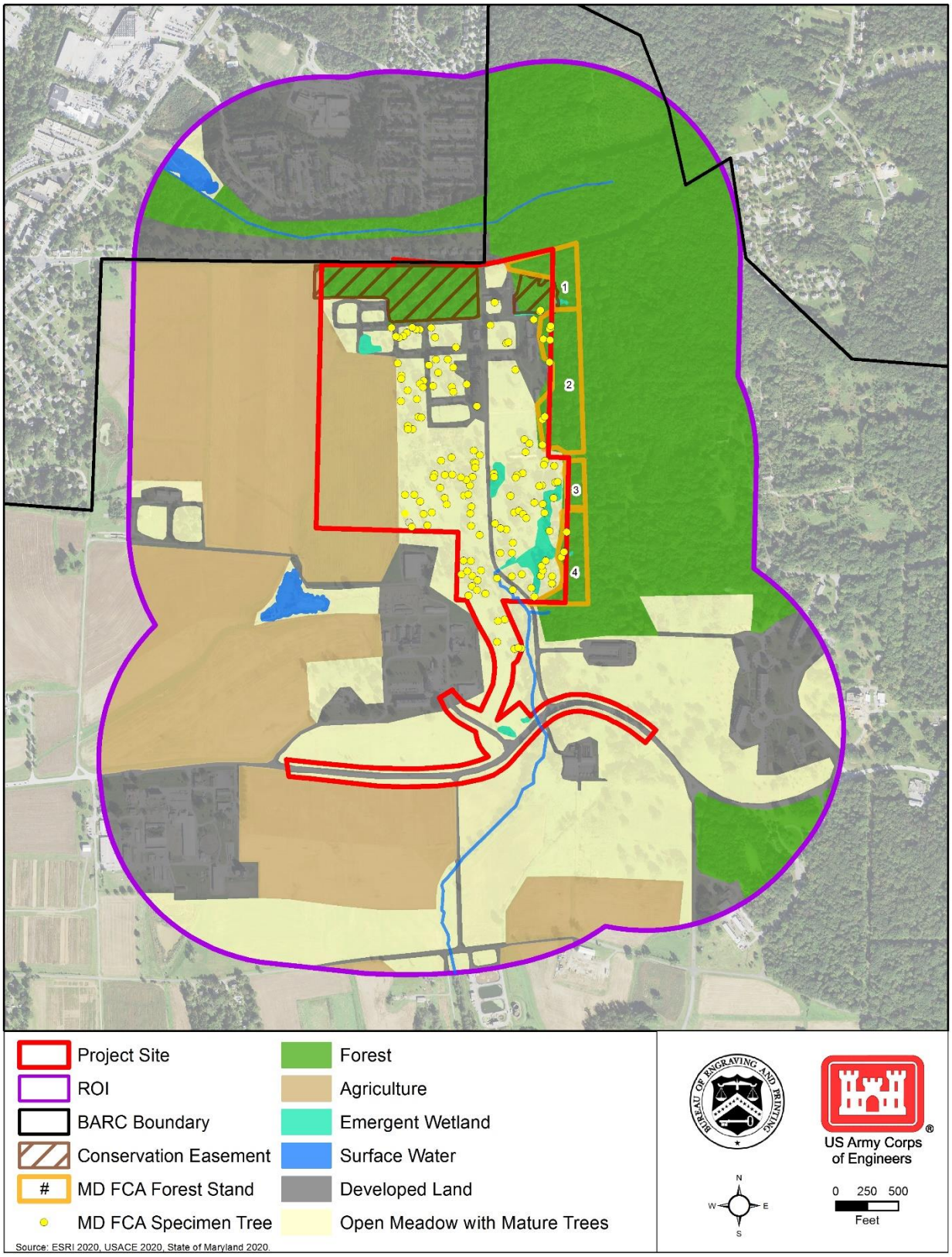


Figure 3.8-1: Existing Features in the Biological Resources ROI

Table 3.8-1: Vegetation Communities within the ROI

Vegetation Community / Land Cover	Dominant Vegetation	Acres of Project Site	Acres of ROI	Percent of ROI
Forest	Oak (*Quercus spp.*), Red Maple (*Acer rubrum*), Sweet gum (*Liquidambar styraciflua*)	17.2	206.7	25.5
Agriculture	Rotation of Corn (*Zea mays*), Soybean (*Glycine max*), and cover crops	21.1	208.8	25.8
Open meadow w/ mature trees	Oaks and grasses	63.6	215.8	26.7
Emergent wetlands	Soft rush (*Juncus effusus*) and reed canary grass (*Phalaris arundinacea*)	2.9	3.0	0.4
Surface water (e.g., ponds, streams)	Not Applicable	0.0	4.2	0.5
Developed land	Not applicable; some grassy areas and landscape trees/shrubs present	17.4	171.3	21.2
Total	**Not Applicable**	**122.2**	**809.7**	**100**

Note: Errors in math due to rounding.

Wildlife

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.

Special Status Species

Federal- and State Listed Species

Treasury identified federal-listed threatened and endangered species with potential to occur in the ROI by using the US Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) database. The only species with the potential to occur within the ROI is the NLEB, listed as "threatened" under the ESA (USDA, 2010). Treasury conducted an acoustic survey for the NLEB on and near the Project Site in June 2019; however, no NLEBs were found (USACE, 2019). Further, no NLEB hibernaculum or maternity roosts exist in Prince George's County (USFWS, 2019).

Treasury consulted with the MDNR Wildlife and Heritage Service (WHS) to determine the potential presence of state-listed species in the ROI. In a letter dated July 14, 2020, the MDNR-WHS confirmed that no state-listed species have been recorded previously in the Project Site. Further, the MDNR-WHS expressed no specific concerns with regard to the Proposed Action's potential impacts on special status species under its jurisdiction.

The reader is referred to the ***Biological Resources Technical Memorandum*** for documentation of consultation with the USFWS and MDNR-WHS.

Migratory Birds

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

(BCCs[18]) (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).

3.8.2 Environmental Effects

This section assesses the potential effects on biological resources within the ROI that could occur under the Proposed Action (i.e., Preferred Alternative) and the No Action Alternative. The reader is referred to the ***Biological Resources Technical Memorandum*** for a complete discussion of potential effects.

3.8.2.1 No Action Alternative

Under the No Action Alternative, Treasury would not construct or operate the Proposed Action. Biological resources within the ROI would not change due to Treasury's proposed activities. The USDA's relocation of activities from three Project Site structures to off-site locations would reduce human activity on the Project Site, potentially providing a ***minor beneficial impact*** on biological resources, notably wildlife species sensitive to human presence.

3.8.2.2 Preferred Alternative

Vegetation

Construction

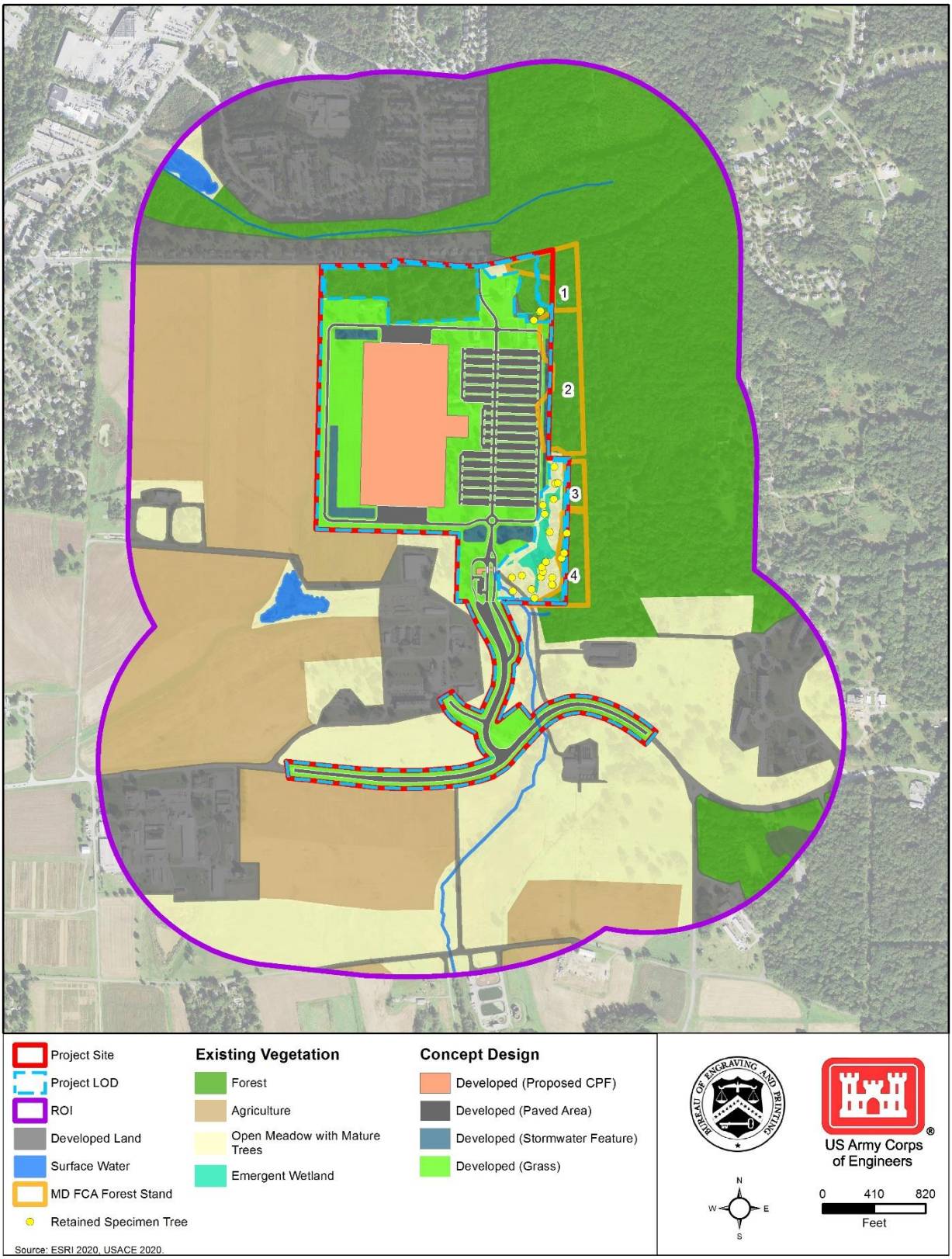
The construction LOD of the Proposed Action include approximately 100.3 acres, or 82.1 percent, of the Project Site. Under the Preferred Alternative, this entire LOD would be converted to developed land, resulting in permanent removal of the existing vegetation communities (i.e., approximately 83.6 acres of vegetation, with the balance of the acreage already developed) within the LOD. **Table 3.8-2** identifies the acreage of each existing vegetation community that would be removed from the Project Site, as well as the associated percentage of removal of each vegetation community within the ROI. **Figure 3.8-2** depicts the area of the Project Site that would be converted to developed land under the Preferred Alternative.

Table 3.8-2: Vegetation Community Removal during Proposed Construction

Vegetation Community	Acres	Percent of Community in ROI
Forest	3.6	1.7
Agriculture	20.7	9.9
Open meadow w/ mature trees	58.4	27.1
Emergent wetlands	0.9	30.0
Total	**83.6**	**N/A**

The Preferred Alternative would result in the removal of 3.6 acres of forest land within BARC (i.e., 0.1 percent), 125 specimen trees, and 80.0 acres of other non-forest vegetation communities. With implementation of EPMs and RCMs identified in **Section 2.2.4**, adverse impacts to forest resources and vegetation in the ROI would remain ***less than significant***.

[18] BCCs are defined as "migratory and non-migratory bird species (beyond those already designated as federally threatened or endangered) that represent [the USFWS's] highest conservation priorities" (USFWS, 2015).



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1988 **Figure 3.8-2: Post-Construction Biological Resources**

Operation

No natural vegetation communities would re-establish within the operational footprint (i.e., construction LOD). Portions of the Project Site not included in this footprint (i.e., approximately 21.9 acres) would remain as they are under existing conditions. The proposed stormwater management features may support limited aquatic vegetation on the Project Site. Overall, operation of the proposed CPF would result in ***negligible impacts*** to vegetation. The Proposed Action would not substantially reduce regionally or locally important habitat or substantially diminish a regionally or locally important plant or animal species.

Wildlife

Construction

Construction of the Proposed Action would permanently remove approximately 83.6 acres of existing, vegetated wildlife habitat within the Project Site (see **Table 3.8-2** and **Figure 3.8-2**). Revegetated portions of the construction LOD would not provide natural habitat; however, proposed stormwater management features may provide limited aquatic habitat on the Project Site.

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.

Operation

Wildlife on and near the Project Site could be disturbed by proposed permanent changes in ambient noise and light levels. Over time, however, many local wildlife species would adapt to these new conditions or relocate to other areas in the ROI. With implementation of the EPMs described in **Section 2.2.4**, potential adverse impacts to wildlife from operation of the Proposed Action would remain ***less-than-significant***.

Special Status Species

Federal- and State-Listed Species

Construction

No effect on federal- or state-listed special status species would be anticipated from the construction of the Proposed Action except on the federally threatened NLEB. While the NLEB was not documented on or near the Project Site during the June 2019 bat acoustic surveys and no known hibernaculum or maternity roosts occur in the ROI, potential suitable roosting habitat does occur on-site.

Using the USFWS IPAC determination key, Treasury determined that the Proposed Action ***may affect*** the NLEB. However, any take that may occur under the Proposed Action would not be prohibited under the ESA Section 4(d) rule adopted for NLEBs. The USFWS provided a letter, dated March 3, 2020, concurring with this determination (see the ***Biological Resources Technical Memorandum***).

As such, the Proposed Action would not adversely affect recovery of a federal- or state-listed species.

Operation

No effect on federal- or state-listed special status species would be anticipated from operation of the Proposed Action.

Migratory Birds

Construction

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**.

Operation

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.

3.8.3 Mitigation Measures

Treasury should implement the following project-specific mitigation measures to further reduce the potential for adverse impacts to biological resources:

- Apply voluntary conservation measures to reduce potential impacts to the NLEB, as identified in the NLEB Programmatic Biological Opinion. These measures may include avoiding tree removal activities within the NLEB pup season (June 1 to July 31) and/or the active season (April 1 to October 31).
- Construct and maintain the proposed stormwater management features to provide as much wildlife habitat value as possible.

3.9 Cultural Resources

This section describes the existing cultural resources in the Proposed Action's ROI and potential impacts to cultural resources from the Proposed Action (i.e., Preferred Alternative) and No Action Alternative. Measures to reduce potential adverse cultural resources impacts from the Proposed Action are identified. Concerns expressed during public scoping regarding cultural resources are considered and addressed. The reader is referred to the ***Cultural Resources Technical Memorandum*** for additional information related to the data presented here.

3.9.1 Affected Environment

3.9.1.1 Region of Influence

The ROI for this analysis is the Area of Potential Effects (APE).[19] The archaeological APE is the Project Site. The architectural history APE is two part: the Project Site (i.e., where buildings and structures could

[19] As defined in Section 106 of the NHPA, the APE is "the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any properties exist…. [The APE] is

be physically affected), and those off-site areas from which the proposed CPF would be distinctly visible (i.e., off-site areas that could be affected through changes in the viewshed).

Figure 3.9-1 identifies these APEs, including a distinct viewpoint on BARC used to analyze potential impacts in the architectural history APE for visual effects (see the ***Cultural Resources Technical Memorandum***). Please refer to the ***Visual Resources Technical Memorandum*** for additional viewpoints along Powder Mill Road and Odell Road within the architectural history APE for visual effects.

3.9.1.2 Applicable Guidance

The primary cultural resources laws and regulations include the NHPA of 1966, Archaeological Resources Protection Act of 1979, Archaeological and Historic Preservation Act of 1974, NAGPRA of 1990, American Indian Religious Freedom Act of 1978, and the Federal Antiquities Act of 1906. Collectively, these regulations direct federal agencies to protect and preserve cultural resources located on federal lands.

Section 106 of the NHPA requires federal agencies to consider and asses the effect of a federal undertaking on historic properties. As part of the Section 106 process, Treasury is consulting with the SHPO (i.e., the MHT), the ACHP, the M-NCPPC, the NCPC, Anacostia Trails Heritage Area Inc., and seven federally recognized Native American Tribes (The Delaware Nation; Delaware Tribe of Indians; Seneca-Cayuga Nation, New York; Oneida Nation of New York; Onondaga Nation, New York; St. Regis Mohawk Tribe, New York; and Tuscarora Nation of New York) with patrimonial ties to the ROI.

3.9.1.3 Existing Conditions

Archaeological Resources

Treasury conducted two Phase I archaeological surveys to identify and evaluate archaeological resources in the archaeological APE (Koziarski, Stewart, & Seibel, 2020; Regan, 2020). Treasury performed these surveys in compliance with Section 106 of the NHPA. The surveys documented 10 archaeological sites within the Project Site. Treasury determined, and the MHT concurred, that seven of these sites are not eligible for the NRHP and three are potentially eligible for the NRHP.

Of the three potentially eligible sites in the archaeological APE, Treasury conducted Phase II evaluations of two of them that could be adversely affected by the Proposed Action. Based on these Phase II evaluations, Treasury determined, pending concurrence from the MHT, that both of these sites are not eligible for the NRHP. Treasury would avoid any potential impacts to the third potentially eligible site, so no further evaluation is required.

Architectural Resources

Treasury documented, evaluated, and assessed architectural resources 45 years of age or older (i.e., constructed in 1974 or earlier) located within the architectural history APEs for physical effects (i.e., the Project Site) and for visual effects. Treasury documented each architectural resource of historic age with an MHT DOE form (Treasury, 2020).

The Project Site is located within the BARC Historic District, a previously identified 6,582 acre historic property. Within the Project Site (i.e., the architectural history APE for physical effects), 22 buildings and structures are contributing resources to this historic district (see **Figure 3.9-2**). Most of these buildings have been vacant for decades. No architectural resource individually eligible for listing in the NRHP exists within the Project Site (MHT, 2019).

influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking" (36 CFR 800.16).

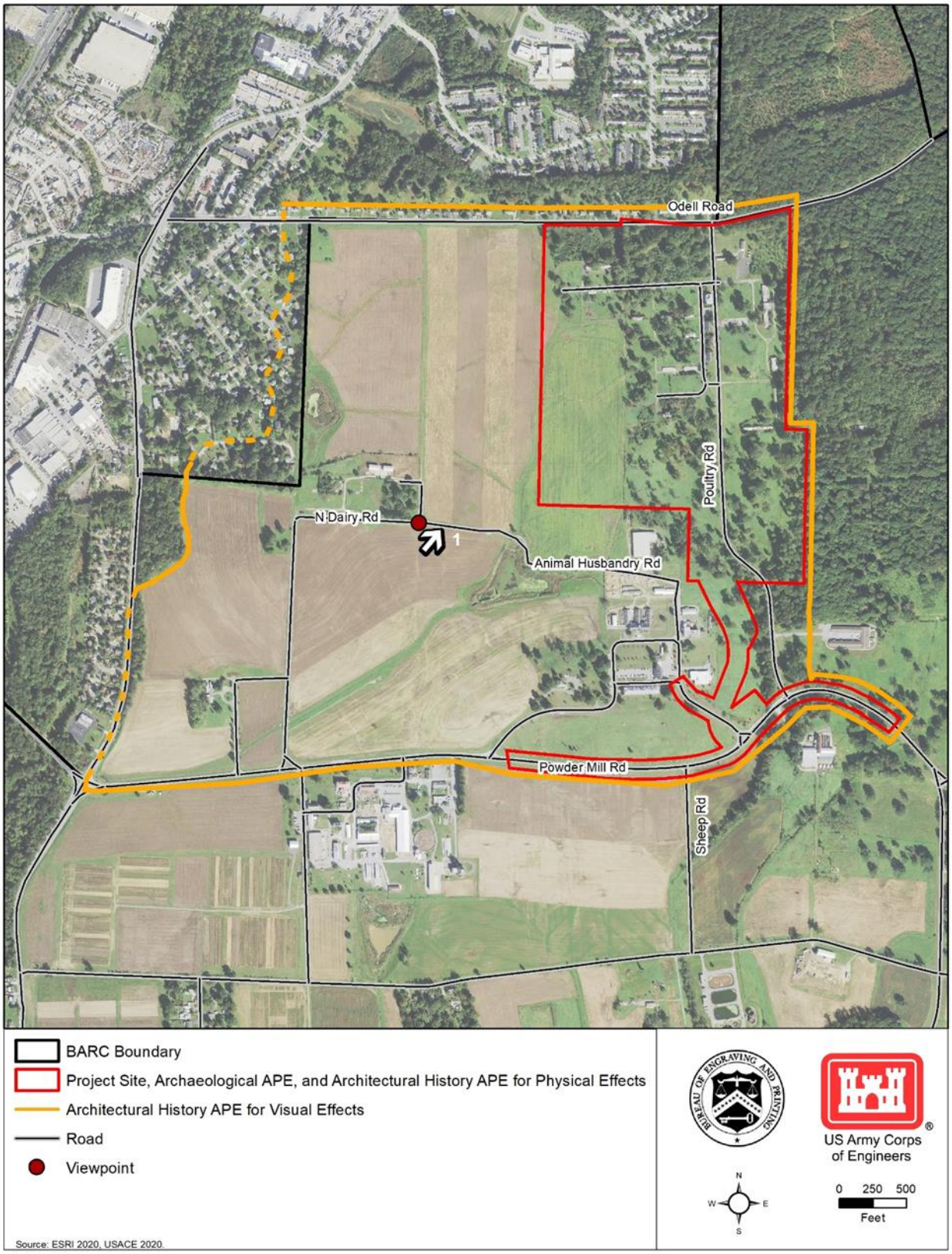


Figure 3.9-1: Cultural Resources ROI

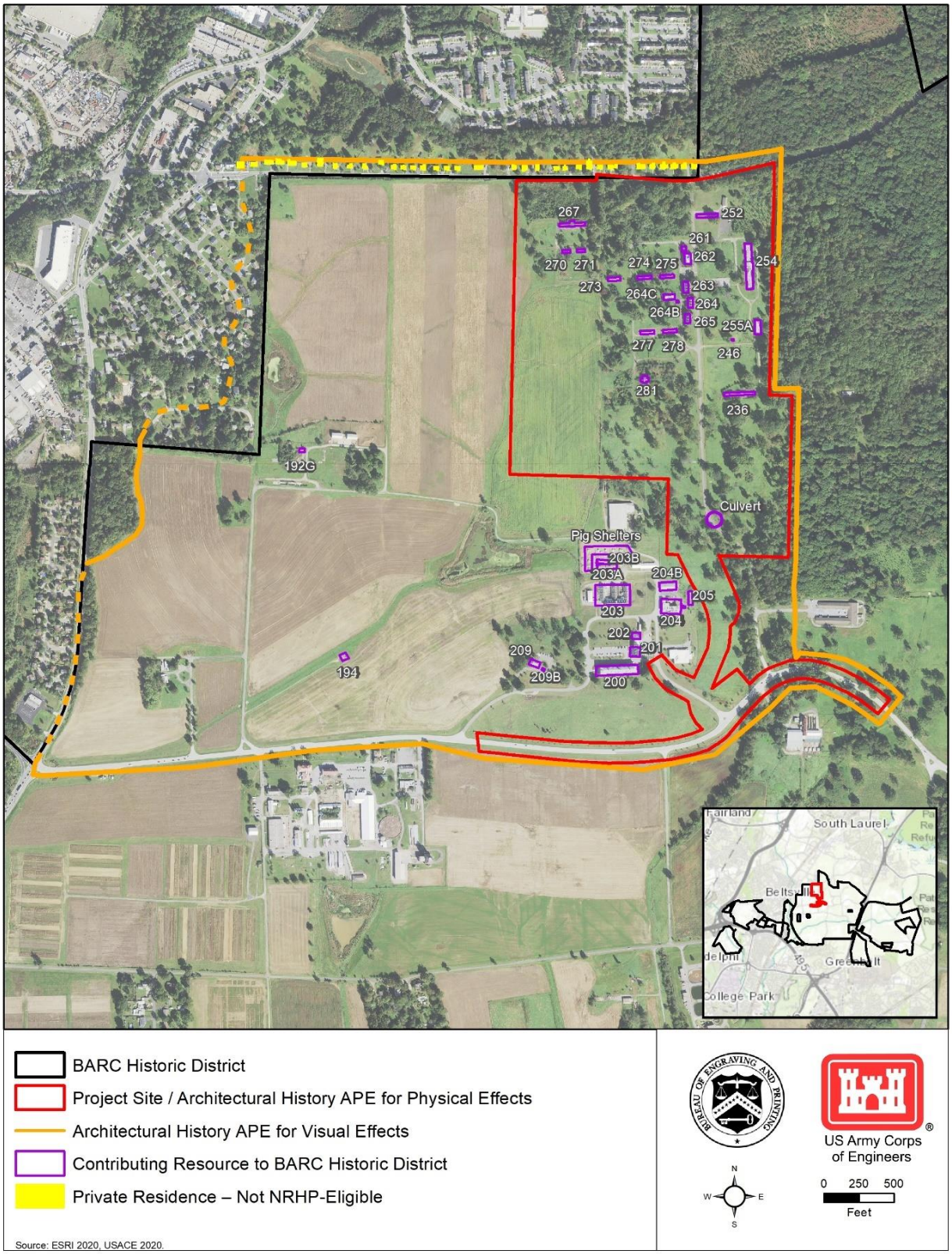


Figure 3.9-2: Architectural Resources in the Architectural History APEs for Physical Effects and Visual Effects

Within the architectural history APE for visual effects, but outside the Project Site, are an additional 16 buildings and structures that comprise contributing resources to the BARC Historic District. This APE also contains 31 private residences of historic age. None of these resources are individually eligible for listing in the NRHP.

Finally, the architectural history APE for visual effects includes a portion of the BARC Historic District within which Treasury identified and photographed viewpoints of the character-defining viewsheds and landscape (see **Section 3.3**). The BARC Historic District's landscape generally consists of vast open space, cultivated fields, and hundreds of buildings and structures scattered throughout the facility. Contributing elements to the landscape of the BARC Historic District include major paved roads, minor service roads, field and research crops, pasture lands, seasonal ponds, forests, sustainable meadows, other landscape features, and buildings (Dwyer, 1973; PAC Spero & Company, 1998; Farris, 2017). This is representative of the architectural history APE for visual effects for the proposed CPF.

3.9.2 Environmental Effects

This section summarizes the potential cultural resources impacts within the ROI that would occur under the Proposed Action (i.e., Preferred Alternative) and the No Action Alternative. The reader is referred to the ***Cultural Resources Technical Memorandum*** for a complete discussion of potential effects.

3.9.2.1 No Action Alternative

Archaeological Resources

Under the No Action Alternative, Treasury would not construct the Proposed Action. The No Action Alternative would have ***no impact*** on archaeological resources in the archaeological APE as the Project Site would continue to be generally unused and undisturbed.

Architectural Resources

The No Action Alternative would have a ***significant adverse impact*** on the BARC Historic District in the architectural history APE due to neglect and deterioration. Contributing buildings and structures on the Project Site (i.e., the architectural history APE for physical effects) that have been vacant for decades would continue to fall into disrepair; these resources may eventually be lost, resulting in loss of integrity of design, setting, materials, workmanship, and feeling for the BARC Historic District, including of its character-defining viewsheds and landscape in the architectural history APE for visual effects.

3.9.2.2 Preferred Alternative

Archaeological Resources

The Preferred Alternative would impact no NRHP-eligible archaeological sites. As Treasury would completely avoid the only potentially eligible archaeological site, ***no impacts*** would occur to this site. The Preferred Alternative could have ***less-than-significant adverse impacts*** on previously unknown archaeological sites if any are discovered during construction; these effects would be minimized to the extent possible through implementation of the measures in **Table 2.2-1**.

Architectural Resources

The Preferred Alternative would have an adverse effect on the one architectural resource (i.e., the BARC Historic District) in the architectural history APE for physical effects. Demolition of the 22 on-site contributing resources to the BARC Historic District, and construction of the proposed CPF, would result in diminished integrity of the BARC Historic District's design, setting, materials, workmanship, and feeling. Treasury, however, would reduce these adverse effects to ***less-than-significant*** levels through implementation of the measures in **Table 2.2-1**.

The Preferred Alternative would also have a ***significant adverse impact*** on the visual environment in the architectural history APE for visual effects, as demolition of the 22 on-site contributing resources and construction of the proposed CPF would diminish the integrity of the BARC Historic District's character-defining viewsheds and landscape design, setting, and feeling. By introducing the proposed CPF into the previously cohesive landscape, the Preferred Alternative would also obstruct vistas and viewscapes 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.

For more information on the potential visual impacts of the proposed CPF, please refer to **Section 3.3**.

3.9.3 Mitigation Measures

Treasury should implement the following mitigation measures to further reduce the potential for adverse impacts to cultural resources:

- Plant native and habitat-appropriate trees and vegetation on the Project Site that would limit views of the proposed CPF from portions of the BARC Historic District outside the Project Site (including from the 16 off-site, but on-BARC, contributing resources), as well as plant additional native and habitat-appropriate trees and vegetation along the northern and western boundary of the Project Site to obscure lines-of-site from these areas.
- Design the proposed CPF using architectural styles that minimize potential adverse impacts to the viewshed.

3.10 Traffic and Transportation

This section describes the traffic and transportation network in the Proposed Action's ROI and potential traffic and transportation impacts from the Proposed Action (i.e., Preferred Alternative) and No Action Alternative. Measures to reduce potential adverse traffic and transportation impacts from the Proposed Action are identified. Concerns expressed during public scoping regarding traffic and transportation are considered and addressed. The reader is referred to the ***Traffic and Transportation Technical Memorandum*** for additional, more detailed information related to the data presented here.

3.10.1 Affected Environment

3.10.1.1 Region of Influence

The ROI for traffic and transportation includes the roadways, pedestrian and bicycle networks, and public transit facilities in the NCR that are relevant to the Proposed Action. This ROI considers the regional transportation network as well as the local transportation network in the vicinity of the Project Site.

The *regional ROI* includes major regional roadways in the NCR that would be used by commuters to and from the proposed CPF (see **Figure 3.10-1**). These include the Capital Beltway (I-495), I-95, Baltimore Avenue (US Route 1), and the Baltimore-Washington Parkway (Maryland Route [MD]-295).

The *local ROI* includes the transportation elements near the Project Site that have the greatest potential to be affected by the Proposed Action. Treasury, in consultation with local planning authorities, identified 15 intersections along roadways anticipated to carry a substantial portion of proposed CPF employee traffic to study in detail. These intersections are bounded by Edmonston Road/Kenilworth Avenue (MD-201) to the west, Capital Beltway to the south, Soil Conservation Road to the east, and Odell Road to the north. The 15 studied intersections and their associated roadways generally encompass the *local ROI* (see **Figure 3.10-2** and **Table 3.10-1**). In addition to roadways, the *local ROI* includes pedestrian transportation elements within 0.25 mile of the Project Site, bicycle transportation elements within 1 mile of the Project Site, and the nearest public transit options in the vicinity of the Project Site (BEP, 2020a).

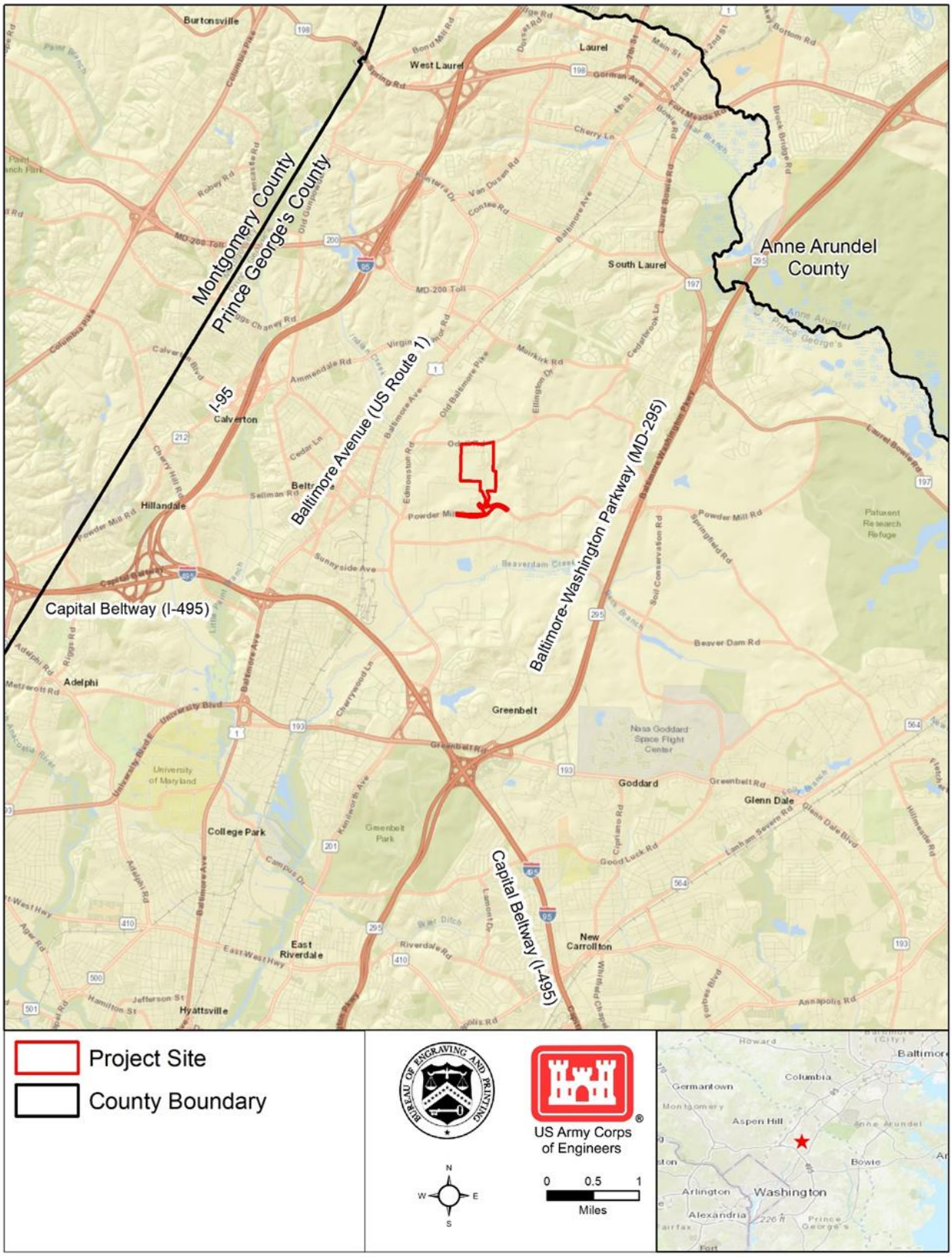


Figure 3.10-1: Regional ROI for Traffic and Transportation

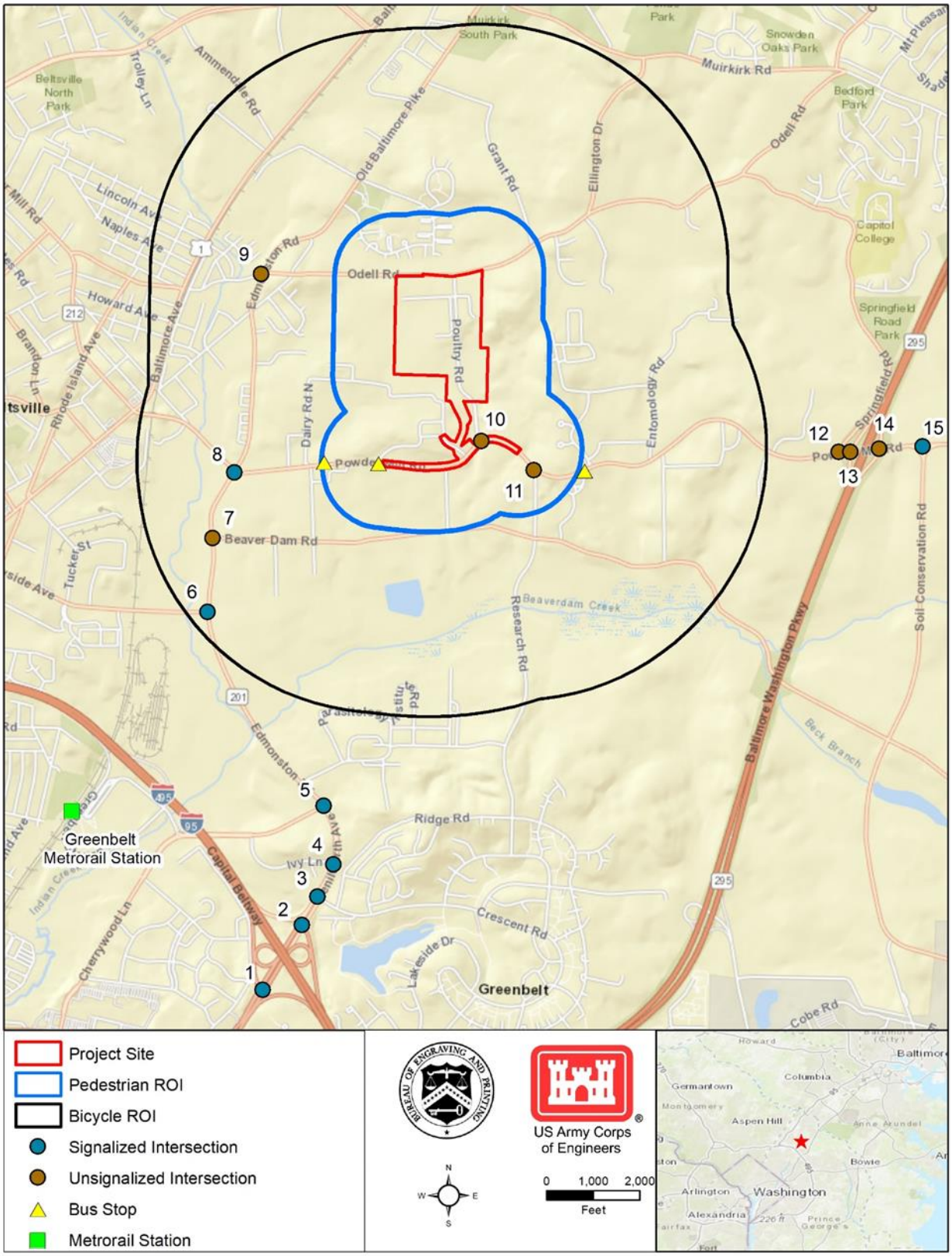


Figure 3.10-2: Local ROI for Traffic and Transportation

2201 **Table 3.10-1: The 15 Studied Intersections in the Local ROI**

ID	Intersection Name	Signalized / Unsignalized
1	Kenilworth Avenue and Capital Beltway Southbound (SB) Off-Ramp	Signalized
2	Kenilworth Avenue and Capital Beltway Northbound (NB) Off-Ramp	Signalized
3	Kenilworth Avenue and Crescent Road	Signalized
4	Kenilworth Avenue and Ivy Lane	Signalized
5	Kenilworth Avenue/Edmonston Road and Cherrywood Lane	Signalized
6	Edmonston Road and Sunnyside Avenue	Signalized
7	Edmonston Road and Beaver Dam Road	Unsignalized
8	Edmonston Road and Powder Mill Road	Signalized
9	Edmonston Road and Odell Road	Unsignalized
10	Powder Mill Road and Poultry Road	Unsignalized
11	Powder Mill Road and Research Road	Unsignalized
12	Powder Mill Road and Springfield Road	Unsignalized
13	Powder Mill Road and Baltimore-Washington Parkway SB Ramps	Unsignalized
14	Powder Mill Road and Baltimore-Washington Parkway NB Ramps	Unsignalized
15	Powder Mill Road and Soil Conservation Road	Signalized

2202 Source: (BEP, 2020a)

2203 ### 3.10.1.2 Applicable Guidance

2204 Treasury would comply with all federal, state, and local laws and regulations relating to traffic and
2205 transportation while constructing and operating the Proposed Action. Please refer to the ***Traffic and***
2206 ***Transportation Technical Memorandum*** for a complete list of applicable laws and regulations relevant to
2207 traffic and transportation.

2208 ### 3.10.1.3 Existing Conditions

2209 *BEP Employee Home Locations*

2210 Treasury surveyed existing DC Facility employees in September 2019 regarding their home locations and
2211 commutes with single-occupant vehicles (SOVs). Of the respondents, approximately 34 percent reside to
2212 the south of the Project Site, approximately 28 percent reside to the west, approximately 16 percent reside
2213 to the east, and approximately 14 percent reside to the north (BEP, 2020a).[20]

2214 *Vehicles (SOVs and Trucks)*

2215 Treasury and local planning authorities determined that the existing AM and PM peak hours in the local
2216 ROI are from 7:45 to 8:45 a.m. and 5:00 to 6:00 p.m. Traffic in the local ROI generally flows unobstructed
2217 for most of the AM and PM peak hour periods. Most employees at the proposed CPF would work the day
2218 shift from 6:30 a.m. to 3:00 p.m.,[21] with anticipated travel occurring between the hours from 6:00 to 7:00

[20] The remaining 8 percent of existing Treasury staff did not answer as they would be dependent on public transit.
[21] Work hours may be altered, as needed, to meet production demands.

a.m. and 3:00 to 4:00 p.m. These expected primary commuting hours do not overlap with current AM and PM peak hours in the local ROI.

Treasury, with approval from local planning authorities, analyzed the existing LOS[22] of each of the 15 studied intersections in the local ROI during the primary commuting hours. Treasury identified the 15 intersections through extensive consultation with regulatory agencies and other stakeholders.

Seven of the 15 intersections currently operate at an acceptable LOS during the proposed primary commuting hours of CPF employees. Eight intersections currently operate at failing LOSs (see **Figure 3.10-3**).

Treasury also analyzed existing queue lengths during the primary commuting hours at these 15 intersections in the local ROI. A queue length that has a 5 percent possibility or more of being exceeded is considered failing; five of the 15 intersections currently experience failing queue lengths in at least one approach. All five of these intersections also have a failing LOS (BEP, 2020a).

Parking near the Project Site is primarily limited to BARC parking lots for service vehicles and employees. Approximately 20 paved surface parking lots are located at nearby BARC office buildings and facilities, but none are on the Project Site (BEP, 2020a). One small, gravel parking area is in the northern portion of the Project Site. There is no on-street parking in the local ROI.

Pedestrian and Bicycle Network

Few sidewalks are present within 0.25 mile of the Project Site. The internal circulation in BARC is primarily vehicular. Outside of BARC, sidewalks exist along residential streets, but these are not contiguous with the Project Site. There are no marked pedestrian road-crossing locations along Powder Mill Road or Odell Road within 0.25 mile of the Project Site.

There are no multi-use paths or roadways with bicycle accommodations within 1 mile of the Project Site. Within the local ROI, Powder Mill Road has a 3-foot to 6-foot striped shoulder[23] between Edmonston Road and the Baltimore-Washington Parkway that provides space for, and is commonly used by, bicyclists.

Public Transit

The Washington Metropolitan Area Transit Authority's (WMATA) Greenbelt Metrorail Station is located approximately 4 miles (via roadways) from the Project Site in the City of Greenbelt. On average, approximately 71 riders exit this station during the AM primary commuting hour, and 145 riders enter this station during the PM primary commuting hour. The AM and PM peak hours of WMATA stations on a regional level do not overlap with the primary commuting hours of the proposed CPF employees (WMATA, 2019; WMATA, 2020a). Further, the Greenbelt Metrorail Station is primarily used heading toward Washington, DC in the morning and returning from Washington, DC in the afternoon, which are reverse directions of CPF employees under the Proposed Action (WMATA, 2020b).

The WMATA Metrobus 87 Route has bus stops within the local ROI (see **Figure 3.10-2**). The nearest stops to the Project Site are approximately 0.5 mile east and west of Intersection 10. There is currently no intercity or commuter bus service to the Project Site.

[22] LOS is the primary performance measure of traffic operations for signalized and unsignalized intersections, ranging from A (the best) to F (the worst). It quantifies driver perception for elements such as travel time, number of stops, total amount of stopped delay, and impediments caused by other vehicles.
[23] Federal Highway Administration guidelines state bicycle striped lanes should be 5 feet wide (FHWA, 2015).

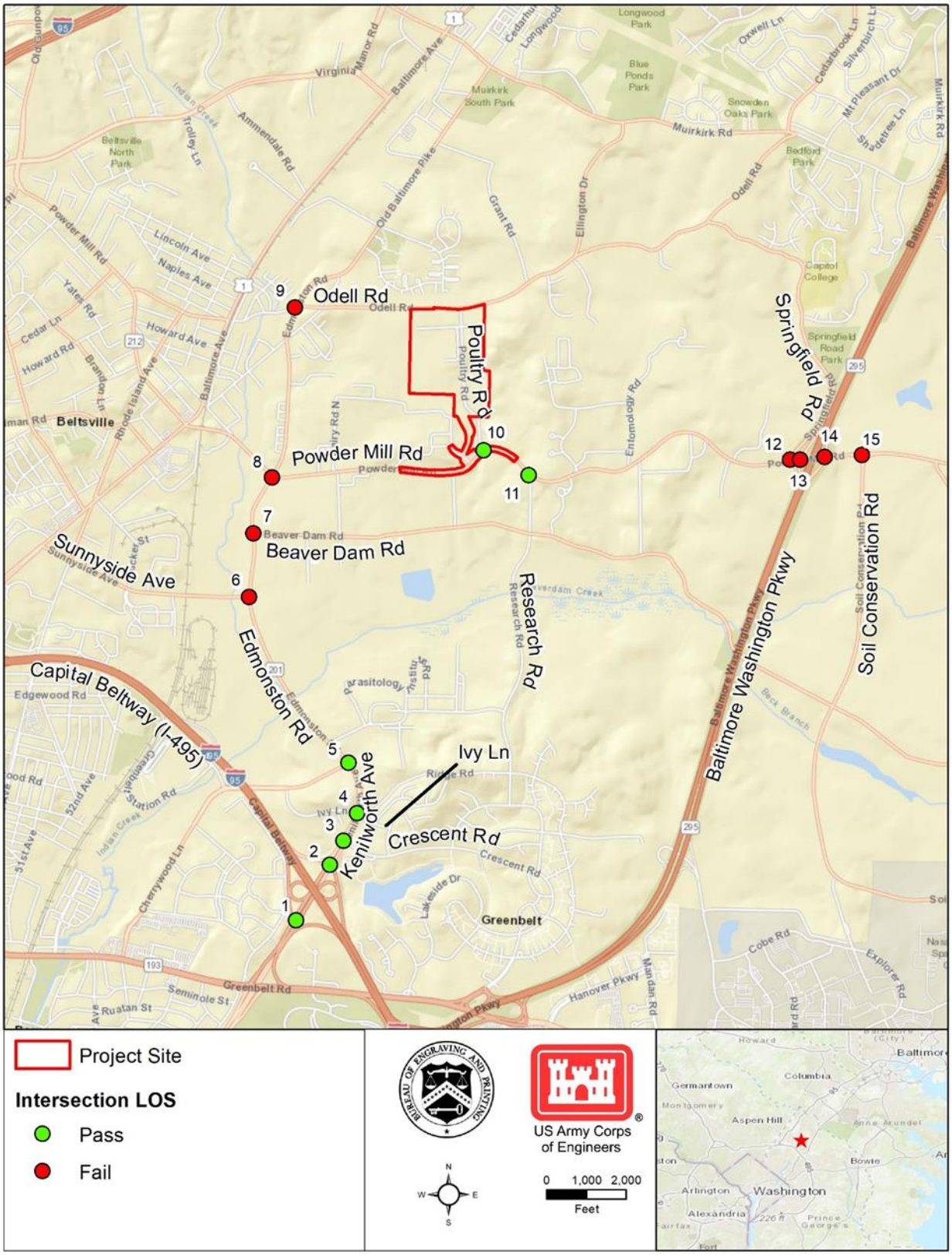


Figure 3.10-3: LOS at the 15 Studied Intersections in the Local ROI under Existing Conditions

The USDA provides one commuter shuttle between BARC and the Greenbelt Metrorail Station which operates on weekdays between 6:42 a.m. and 6:08 p.m. The commute is typically 10 to 12 minutes. Several ride-hailing and carsharing[24] companies currently serve the regional and local ROIs. The Proposed Action would have no noticeable effect on these services; as such, they are not analyzed further.

3.10.2 Environmental Effects

This section analyzes the potential impacts to traffic and transportation within the regional and local ROIs that could occur under the Proposed Action (i.e., Preferred Alternative) and the No Action Alternative. The reader is referred to the ***Traffic and Transportation Technical Memorandum*** for a complete discussion of potential effects.

Overall, the Preferred Alternative would have ***significant adverse impacts*** on traffic in the local ROI (in 2029) due to the continued failing LOS of Intersections 6 and 8, which are also failing under current conditions; failing LOS of Intersections 10, 12, 13, and 14; and failing queue lengths at Intersection 8.

In comparison, the No Action Alternative (in 2029) would only result in ***significant adverse impacts*** due to the continued failing LOS at Intersection 6 and increased queue lengths at Intersections 6 and 13.

Therefore, the difference is that the Preferred Alternative, as compared to the No Action Alternative, would (in 2029) continue the failing LOS of Intersection 8; result in failing LOS at Intersections 10, 12, 13, and 14; and result in failing queue lengths at Intersection 8.

3.10.2.1 No Action Alternative

Under the No Action Alternative, Treasury would not construct or operate the Proposed Action. The Project Site would remain in its current condition and Treasury would not change the existing regional or local transportation networks or generate or eliminate any demands on them; therefore, Treasury would have ***no impact*** on traffic and transportation.

Various development projects and general growth of the region would occur independent of the Proposed Action. Regional growth would result in ***less-than-significant adverse impacts*** on traffic in the regional ROI and on public transit in the local ROI and ***negligible impacts*** on pedestrian and bicycle facilities in the local ROI.

Seven of the 15 studied intersections would have a failing LOS in 2029 (see **Figure 3.10-4**) compared to eight failing intersections in 2020. ***Significant adverse impacts*** (continued from current conditions) would occur at Intersection 6 and beneficial impacts would occur at Intersections 8 and 15.

Six of the 15 studied intersections would experience failing queue lengths in at least one approach. Treasury anticipates ***less-than-significant adverse impacts*** to all studied intersections in the ROI due to longer queue lengths, except for ***significant adverse impacts*** (continued from existing conditions) at Intersections 6 and 13 and ***beneficial impacts*** at Intersection 15.

3.10.2.2 Preferred Alternative

Construction

Vehicles (SOVs and Trucks)

Construction traffic, including workers in SOVs, carpools, and trucks would travel to and from local locations. Construction workers would use the same roads within the regional ROI as they would for other construction projects. Therefore, there would be ***no impacts*** on roadways in the regional ROI.

[24] Ride-hailing allows users to call a driver for a one-time trip to a destination. Carsharing allows users to rent a vehicle for short periods of time (i.e., hours or days) for personal use.

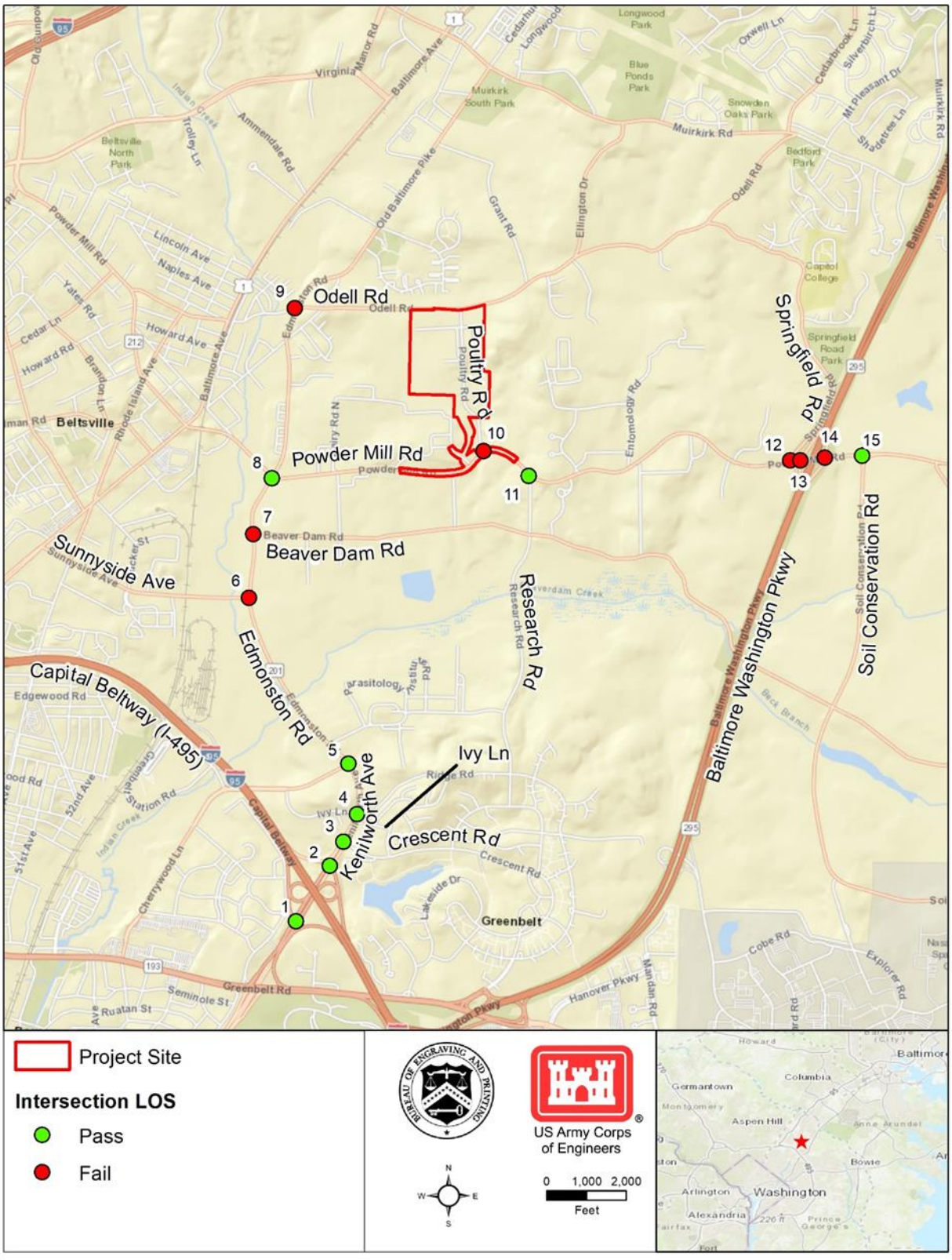


Figure 3.10-4: LOS at the 15 Studied Intersections in Local ROI under the No Action Alternative

Construction worker commutes would be distributed throughout the entire construction phase, but truck trips would primarily occur during the first two years of construction (i.e., while disposing of demolition materials and delivering construction materials). Truck traffic would be spread across the entire workday, minimizing impacts on local peak hours and traffic conditions. While this traffic would contribute slightly to traffic volume and congestion, it would not lead to permanent degradation of traffic operations. Therefore, with implementation of EPMs (see **Section 2.2.4**), construction traffic would have a ***less-than-significant adverse impact*** on traffic in the local ROI.

Construction of the Powder Mill Road modifications would require temporary closure of all or part of Powder Mill Road within the Project Site. Treasury would maintain one-way, alternating traffic on Powder Mill Road to the extent practicable. In the event through-traffic must be halted on Powder Mill Road at any point during construction, Treasury would establish adequate and well-marked detours to fully accommodate local traffic. Treasury would plan all roadwork in close consultation with local planning authorities, and would maintain impacts to local traffic from temporary closures on Powder Mill Road at ***less-than-significant*** levels.

Treasury would create an adequate, temporary parking area on the Project Site for construction worker vehicles and trucks. No vehicles or equipment would be parked off-site or on local streets. There would be ***no impacts*** to parking in the regional or local ROIs.

Pedestrian and Bicycle Network

The Project Site would be inaccessible to pedestrians during construction; however, since the pedestrian network is generally lacking or absent, there would be ***no impacts*** from the Proposed Action.

During construction, there would be temporary closures of the 3-foot to 6-foot striped bicycle shoulder on Powder Mill Road during construction of the proposed Powder Mill Road modifications. The shoulder would be restored following completion of these construction activities, resulting in a ***less-than-significant adverse impacts*** to the bicycle network in the local ROI.

Public Transit

Some construction workers could commute to work using public transit that would generate new transit trips from the Greenbelt Metrorail Station and/or the Metrobus 87 route, but not in perceptible numbers. With implementation of EPMs, construction workers' use of public transit would cause ***negligible adverse impacts*** to public transit from increased ridership.

Operation

Vehicles (SOVs and Trucks)

Employees of the proposed CPF would commute to the facility via major regional roadways that are already heavily trafficked; the increase in traffic on these routes would not be perceptible. Commuters to the DC Facility already use these same roads under current conditions. There could be a slight increase in the number of employees commuting with SOVs due to the decreased accessibility of the proposed CPF via public transit compared to the DC facility. Conversely, there could be a slight decrease in truck trips in the regional ROI as trips to and from the Landover facility would be eliminated. Overall, potential adverse impacts on roadways in the regional ROI from marginal changes in traffic volume would be ***negligible***.

Treasury anticipates approximately 82 trucks would arrive at and depart from the proposed CPF weekly. This increase in truck traffic would be imperceptible in the regional ROI, resulting in ***no impacts***. Increased truck traffic in the local ROI would be perceptible but minor, particularly along Powder Mill Road as trucks approach and depart from the proposed CPF. With EPMs in place (see **Section 2.2.4**), truck traffic would have a ***less-than-significant adverse impact*** on local roadways.

Operation of the proposed CPF would result in approximately 130 to 135 additional trips from CPF employees during the local ROI's AM and PM peak hours, resulting in a ***less-than-significant adverse impact*** to local traffic during the most congested periods of the day.

Nine of the 15 studied intersections would have a failing LOS (see **Figure 3.10-5**) in 2029, compared to seven failing intersections under the No Action Alternative. Based on the LOS analysis, Treasury anticipates ***less-than-significant adverse impacts*** to all studied intersections in the ROI due to longer delays at intersections, except that impacts to Intersections 6, 8, 10, 12, 13, and 14 would be **significant and adverse**.

Treasury determined that 9 of the 15 studied intersections would experience failing queue lengths in at least one approach. Treasury anticipates ***less-than-significant adverse impacts*** to all studied intersections in the ROI due to longer queue lengths, except that impacts to Intersection 8 would be ***significant and adverse***.

The proposed CPF would have a surface parking lot with 1,179 parking spaces, which would be sufficient for both employees and visitors at any given time. This parking lot would be contained within the Project Site and there would be no changes to parking off-site, resulting in ***no impacts*** to parking in the local ROI.

Pedestrian and Bicycle Network

No improvements or changes to the pedestrian or bicycle network outside of the Project Site would occur. Overall, there would be ***minor adverse impacts*** to the existing pedestrian and bicycle networks in the local ROI. While no designated bicycle lanes currently exist along Powder Mill Road or are proposed under the Preferred Alternative, this road is commonly used by bicyclists. Additional vehicle traffic from operation of the proposed CPF could make the road less appealing for biking.

Public Transit

Treasury anticipates only 9 percent (i.e., approximately 100) of CPF employees would take public transit to work, as very few Metrorail trains arrive at the Greenbelt Metrorail Station in time for employees to travel to the proposed CPF prior to the start of their day shift. This would generate minimal new transit trips impacting primarily the Greenbelt Metrorail Station and the Metrobus 87 route along Powder Mill Road. Any increase in Metrorail or Metrobus ridership would be minor, as both transit systems would be able to accommodate the minimal increased passenger load. Therefore, there would be ***negligible adverse impacts*** to public transit from slightly increased ridership.

3.10.3 Mitigation Measures

Treasury should design and implement mitigation measures for those intersections anticipated to experience ***significant adverse impacts*** under the Preferred Alternative: Intersections 6, 8, 10, 12, 13, and 14. Intersection mitigation typically includes design measures such as:

- Adjusting signal control types, timings, and phasings.
- Signalizing or installing roundabouts to unsignalized intersections.
- Changing existing lane geometry within the existing right-of-way.
- Adding new turn lanes or through lanes, or extending existing turning lane storage bays by assuming additional right-of-way.

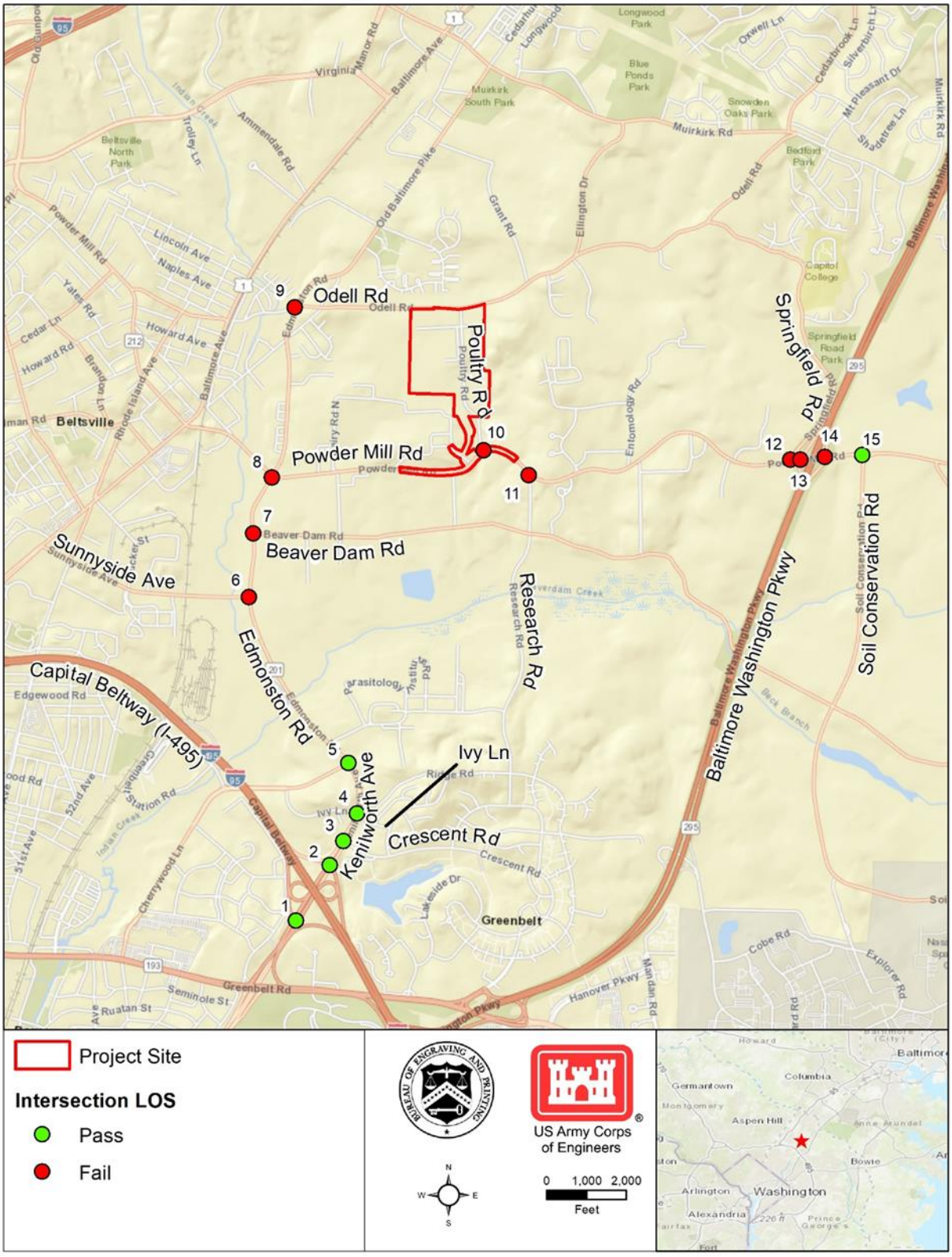


Figure 3.10-5: LOS at the 15 Studied Intersections in Local ROI under the Preferred Alternative

Treasury, through close coordination with local planning authorities, identified and designed potential mitigation measures in the ***Transportation Impact Study*** for each anticipated significantly and adversely affected intersection, correspondent with the above mitigation recommendations. Additionally, Treasury anticipates that the Powder Mill Road modifications included in the Proposed Action would be designed in a manner that facilitates proper functioning of all intersections/driveways within the Project Site (e.g., including Intersection 10).

Treasury should continue to consult with local planning authorities throughout the design process to refine these intersection-specific improvement measures. Effective mitigation designs would reduce adverse impacts to less-than-significant levels for all affected intersections.

In addition to mitigating significant adverse impacts to intersections, Treasury should consider the following mitigation measures to further reduce identified ***less-than-significant adverse impacts***:

- In consultation with local planning authorities, implement traffic-calming devices (e.g., speed bumps), reduce speed limits, and/or create pedestrian/bicycle lanes along roadways in the local ROI, such as Powder Mill Road. Rumble strips should be avoided, if feasible, as the existing rumble strips on Powder Mill Road have generated noise complaints from both the surrounding community and BARC employees.
- Incorporate pedestrian/bicycle amenities into the Preferred Alternative during the design process.
- Consult with WMATA regarding the opportunity to adjust Metrobus routes such that they serve the proposed CPF more effectively (e.g., installing 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.

3.11 Utilities

This section describes the utility systems in the Proposed Action's ROI and potential impacts to those systems from the Proposed Action (i.e., Preferred Alternative) and No Action Alternative. Measures to reduce potential adverse utilities impacts from the Proposed Action are identified. Concerns expressed during public scoping are considered and addressed. The reader is referred to the ***Utilities Technical Memorandum*** for additional, more detailed information related to the data presented in each of the following sections.

3.11.1 Affected Environment

3.11.1.1 Region of Influence

The utilities ROI is the Project Site and off-site areas providing required utility connections. Most of these connection points are located on BARC to the south of the Project Site. Specific locations of utility features are shown in **Figure 3.11-1**.

3.11.1.2 Applicable Guidance

Federal guidance and regulations relevant to this analysis include the EISA, EO 13834, EO 13508, and the UFC Department of Defense Building Code. Collectively, these regulations and guidance establish energy-efficiency and sustainable design goals for federal buildings. 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**).

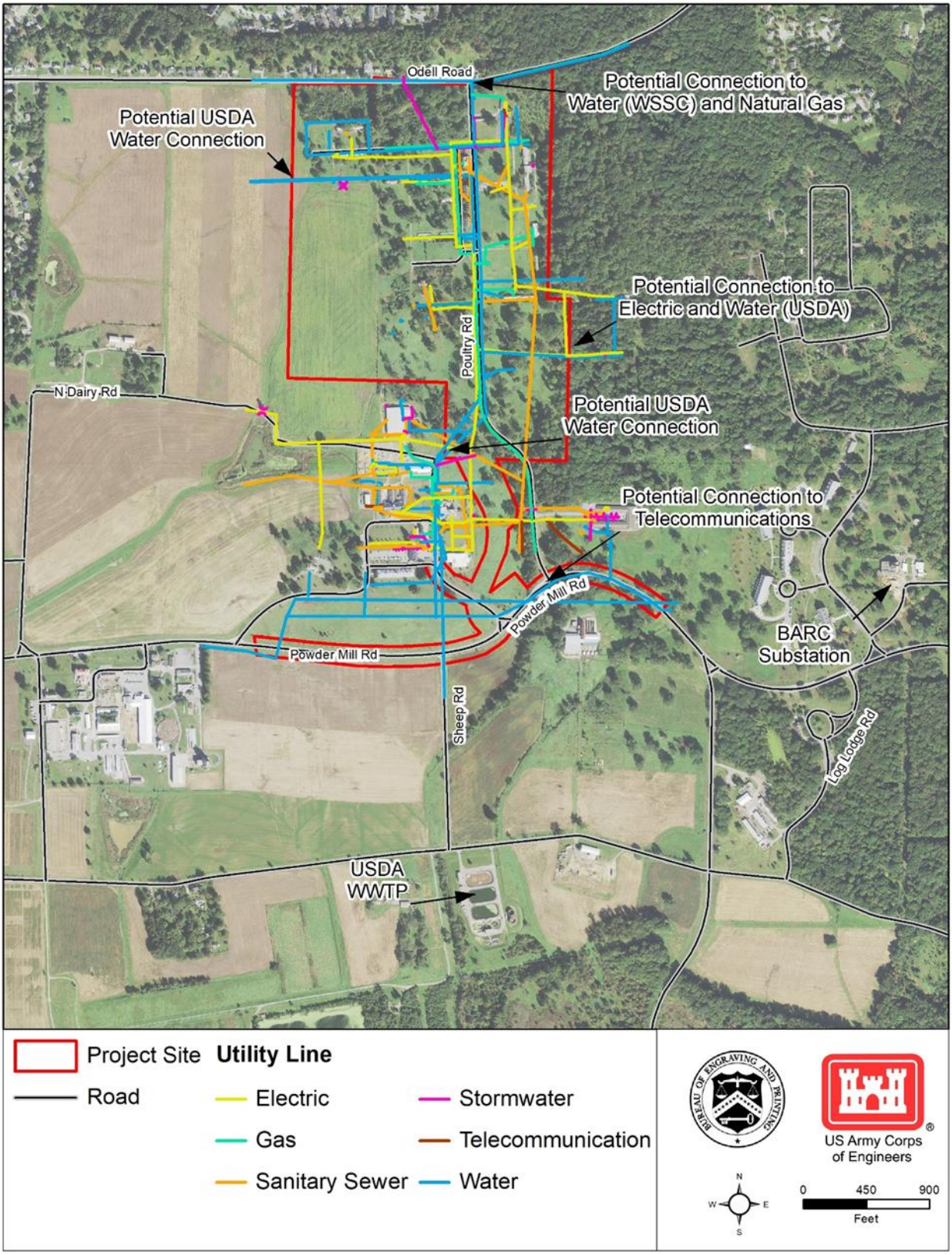


Figure 3.11-1: Existing Utility Infrastructure and Potential Connection Points in the ROI

3.11.1.3 Existing Conditions

Three operational USDA buildings are active at the Project Site that generate limited demand for utilities. Existing utility systems at the Project Site provide access to electricity, natural gas, water, sanitary sewer, non-hazardous solid waste, telecommunications, and stormwater management. Existing utility conditions are summarized below.

- *Potomac Electric Power Company (Pepco)* supplies electricity to the Project Site via a nearby BARC-owned substation.
- *Washington Gas* provides natural gas; gas lines are present throughout the Project Site, extending from Odell Road south to Powder Mill Road.
- The *USDA* operates its own water service at BARC that supplies water for domestic, fire protection, and irrigation uses, including at the Project Site. The primary water provider in the region, however, is the *WSSC;* the WSSC does not currently serve the Project Site but operates a water line adjacent to the site along Odell Road (BEP, 2020).
- The *USDA* provides sanitary sewer service; sewage from the Project Site is conveyed to the USDA-owned and operated WWTP located approximately 0.3 miles south of the Project Site. The USDA is currently renovating the sanitary sewer system at BARC.
- The USDA contracts with *RJ Disposal Service*, a private waste service, to remove non-hazardous solid waste generated at BARC and transport it to appropriate off-site landfills and disposal facilities (USDA, 2018). Prince George's County operates county landfills, including the Brown Station Road Sanitary Landfill, its primary municipal landfill.
- *Verizon* is the primary telecommunications provider at BARC.
- Limited stormwater management infrastructure, currently in disrepair, exists at the Project Site; BARC operations are permitted under a NPDES MS4 Phase II General Stormwater Permit (see **Section 3.7**).

3.11.2 Environmental Effects

This section summarizes the potential utilities impacts within the ROI that would occur under the Proposed Action (i.e., Preferred Alternative) and the No Action Alternative. The reader is referred to the ***Utilities Technical Memorandum*** for a complete discussion of potential effects.

3.11.2.1 No Action Alternative

Under the No Action Alternative, Treasury would not construct the Proposed Action. Treasury would continue to operate the existing DC Facility; these current conditions do not adversely impact local utilities.

Under a separate action, the USDA would relocate operations from the existing operational buildings within the Project Site to elsewhere on BARC; therefore, utility usage at the Project Site would be anticipated to cease soon. As there would be no change to existing utilities from the Proposed Action at the Project Site, however, the No Action Alternative would result in ***no impact*** on utilities in the ROI.

3.11.2.2 Preferred Alternative

As part of the Proposed Action, all existing utility infrastructure at the Project Site would be removed and replaced with new infrastructure designed to support the specific needs of the Proposed Action, tying into existing utility infrastructure proximal to the Project Site (see **Figure 3.11-1**). New connections to WSSC

and telecommunications infrastructure would be established and current outdated lines providing electricity, natural gas, sanitary sewer, and stormwater management would be replaced.

Renewable energy sources and sustainable features would be considered during design of the Proposed Action; currently, Treasury intends to incorporate rooftop solar panels on the proposed CPF. Additionally, the use of high-efficiency equipment would reduce the amount of energy required to operate the proposed CPF (see **Section 2.2.1**).

Table 3.11-1 summarizes the anticipated utility providers for, and the utility demand of, the Proposed Action, as well as the anticipated capability of utility providers to meet these requirements based on current and/or proposed utility systems. Treasury has conducted extensive coordination with utility providers based on the Proposed Action's anticipated utility requirements (BEP, 2020).

Table 3.11-1: Anticipated Utility Conditions

Utility	Demand	Provider	Sufficient Capacity?
Electricity	6.5 megawatts	Pepco	**Yes**
Natural Gas	600,000 cubic feet per day	Washington Gas	**Yes**
Water	280,000 gpd	WSSC[1] and USDA-ARS	**Yes**
Sanitary Sewer	120,000 gpd	USDA-ARS	**Yes**

1. Before supplying water for the Proposed Action, the WSSC would need to apply for a waiver from Prince George's County to service the Project Site. Further, while Treasury anticipates using the WSSC for the full demand of the proposed CPF, it would also establish a connection to the USDA water system to provide supplemental external fire protection capability.

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.

Construction

The Proposed Action would cause ***negligible adverse impacts*** to the ROI from temporary service disruptions of natural gas and water utilities during construction. Potential service disruptions to local communities during the connection of new, non-USDA-owned utility lines at the Project Site would be minimized to the extent practicable with implementation of EPMs identified in **Section 2.2.4**, such as efficient construction sequencing and providing affected users with advance notice of anticipated disruptions. All other utility modifications would be for utilities located on BARC and associated with BARC operations; ***no impacts*** to non-BARC end users would occur. Construction equipment would be diesel-powered and would not require the use of on-site utility services.

Construction of the Proposed Action would remove existing utility systems that are outdated and in disrepair from the Project Site, replacing them with new, efficient utility infrastructure. This would improve the conditions and operations of utility systems at the Project Site, such as by decoupling the stormwater management and sanitary sewer systems. Therefore, utility upgrades associated with the Proposed Action would constitute a ***beneficial impact*** to BARC, including the Project Site, due to improved utility efficiency.

Operation

Operation of the proposed CPF under the Preferred Alternative would result in overall increases in utility demand at the Project Site, but would cause ***negligible adverse impacts*** on demand and availability of those utilities.

Through detailed analysis and close consultation between Treasury and ROI utility providers, the utility providers identified that they would be able to accommodate the increased demand from the proposed CPF while still meeting their existing and known future demands.

The long-term increase in utility demand from the proposed CPF would be minor in comparison to the overall capacity of the providers and would not reduce utility supply for other customers; operation of the proposed entrance road would not require use of utilities. Treasury would also pursue energy-efficient and sustainable design strategies, including maintaining a Silver LEED rating, installing rooftop solar panels, and potentially implementing other renewable energy systems to minimize the utility demand for the proposed CPF (see **Section 2.2.1**). Stormwater generated during operation would be managed in accordance with Section 438 of the EISA and EO 13508, including use of GI/LID and methods for controlling nonpoint source pollution (see **Section 3.7**), and wastewater would be treated by the USDA-owned WWTP to required water quality standards.

3.11.3 Mitigation Measures

No project-specific mitigation measures are recommended.

3.12 Socioeconomics and Environmental Justice

This section describes socioeconomic characteristics and EJ communities in the Proposed Action's ROI and potential impacts from the Proposed Action (i.e., Preferred Alternative) and No Action Alternative. Measures to reduce potential adverse impacts to these resources are identified.

For this analysis, Treasury describes and analyzes socioeconomic conditions regarding population, housing, labor force and employment, and community services conditions in the ROI. Treasury describes and analyzes EJ conditions regarding race, ethnicity, income, and poverty conditions in the ROI.

Impacts under EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks*, would not occur and are not further evaluated within this section.

Concerns expressed during public scoping regarding socioeconomics and EJ are considered and addressed. The reader is referred to the ***Socioeconomics and Environmental Justice Technical Memorandum*** for additional information related to the data presented here.

3.12.1 Affected Environment

3.12.1.1 Region of Influence

Socioeconomic ROI

The socioeconomic ROI is the Washington-Arlington-Alexandria Metro Area (Metro Area). This approximately 6,247-square mile ROI includes Calvert, Charles, Frederick, Montgomery, and Prince George's Counties in Maryland; Washington, DC; Arlington, Clarke, Culpeper, Fairfax, Fauquier, Loudoun, Prince William, Rappahannock, Spotsylvania, Stafford, and Warren Counties in Virginia; and Jefferson County, West Virginia (see **Figure 3.12-1**) (OMB, 2015; US Census Bureau, 2018).

Environmental Justice ROI

The EJ ROI includes parts of the Cities of Beltsville and Greenbelt. Eight census tracts are included in this ROI: 8004.11, 8067.06, 8067.08, 8067.12, 8067.13, 8067.14,8074.04, and 8074.08. The Project Site is located entirely within census tract 8074.08 (see **Figure 3.12-2**).

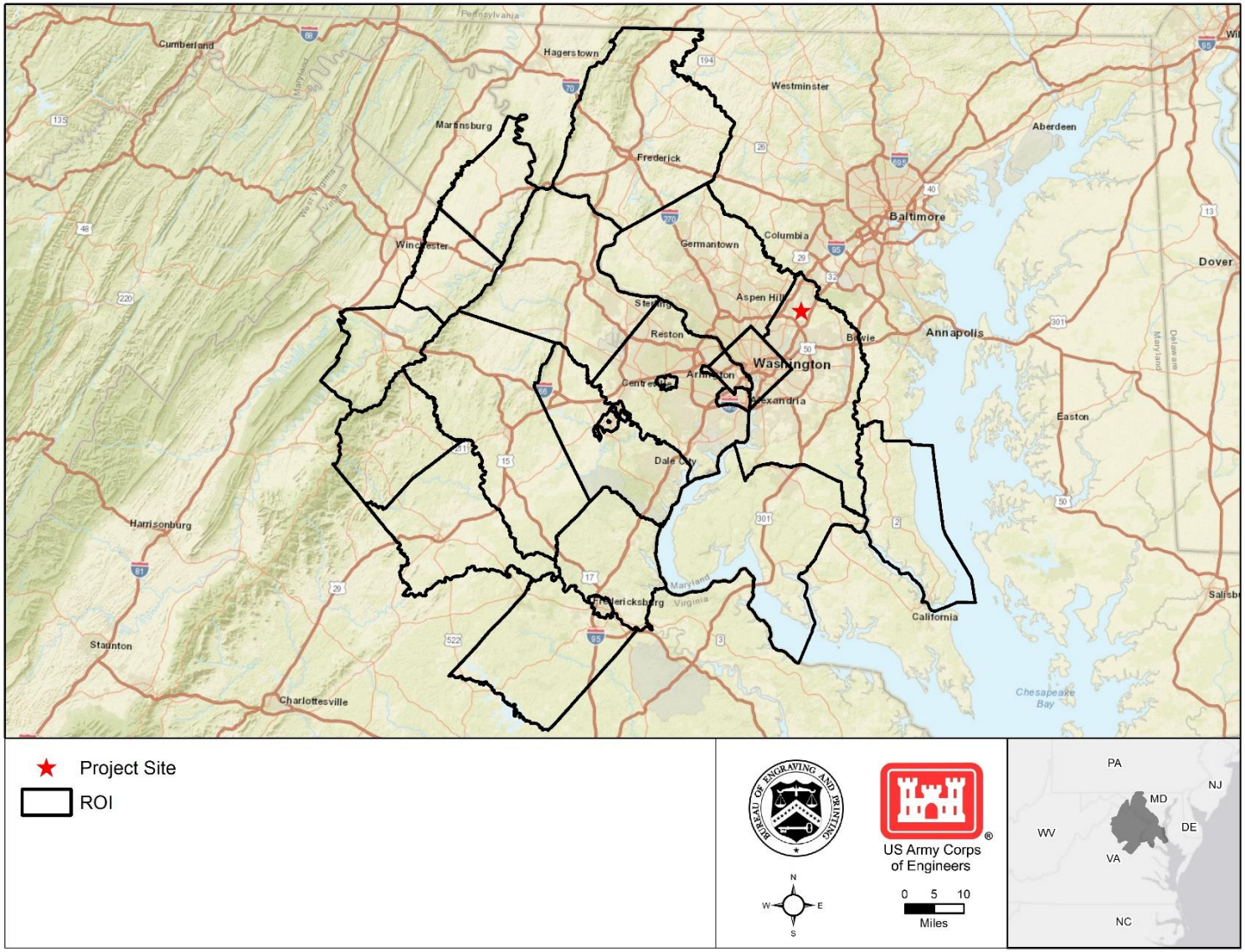


Figure 3.12-1: Socioeconomic ROI

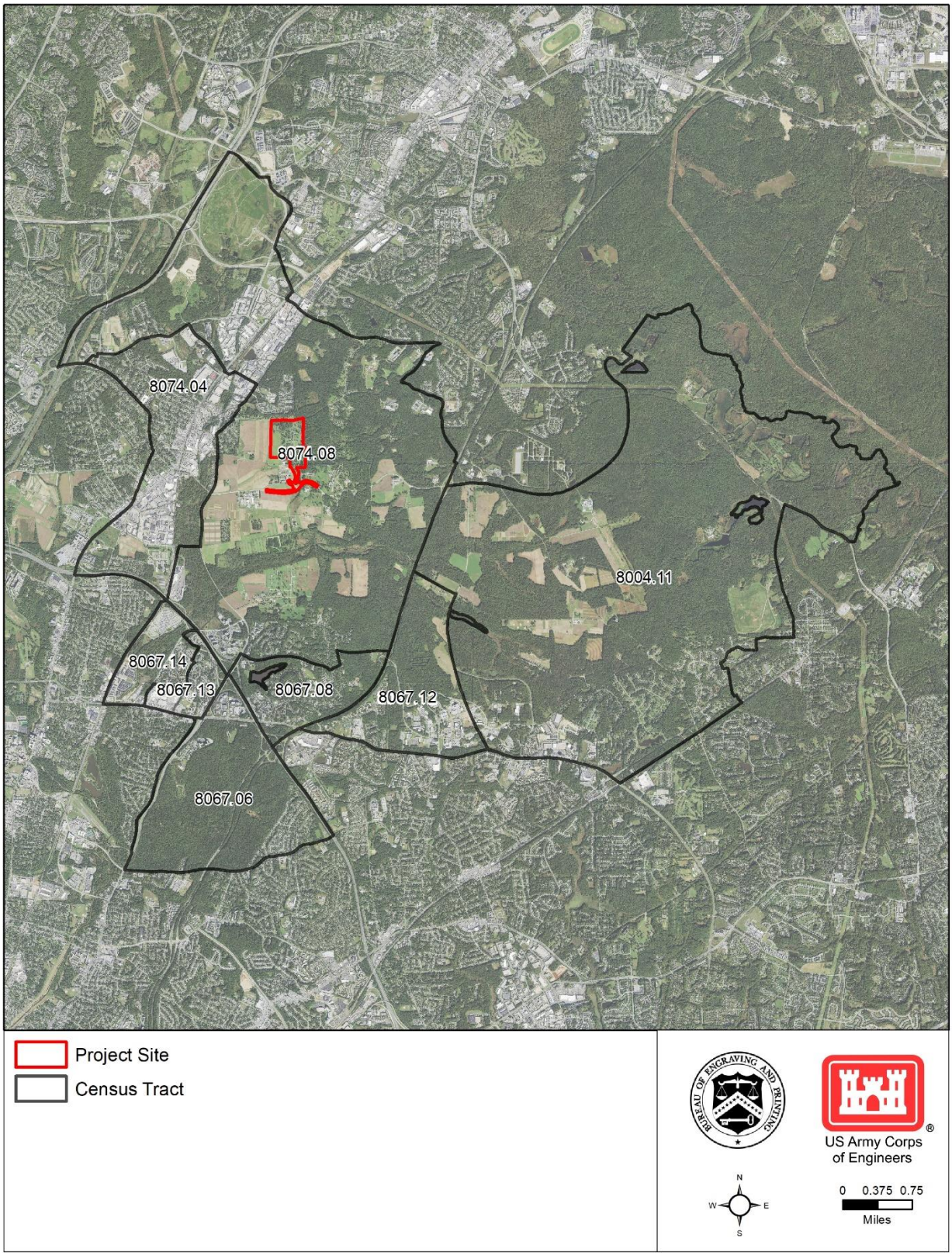


Figure 3.12-2: Environmental Justice ROI

3.12.1.1 Applicable Guidance

The primary regulations related to the Proposed Action's impacts on socioeconomics and EJ are EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*; and CEQ Environmental Justice Guidance under the National Environmental Policy Act. EO 12898 directs federal agencies to identify and address whether their actions would cause disproportionate impacts to EJ communities of concern, or places that are home to high concentrations of minority and low-income populations. The CEQ guidance provides criteria for identifying EJ communities of concern and how to address EJ considerations appropriately.

3.12.1.2 Existing Conditions

Socioeconomic Characteristics

The US Census Bureau and American Community Survey (ACS) datasets provide information on socioeconomic conditions in the United States. Treasury examined data for the socioeconomic ROI from Prince George's County and the state of Maryland to provide a comparative analysis of regional conditions. Treasury used the 2018 ACS dataset for the Metro Area statistics. A complete 2018 ACS dataset is not currently available for Prince George's County or Maryland, so Treasury used data from the 2013-2017 ACS 5-Year Estimates dataset for the county and state.

Population

The overall population within the socioeconomic ROI is greater than in Maryland, reflecting the highly urbanized character of the non-Maryland counties in the ROI. The population characteristics also indicate a growth trend between 2010 and 2018, with the ROI having a greater increase in population than Prince George's County and Maryland (US Census Bureau, 2017f; US Census Bureau, 2018; US Census Bureau, 2019).

Housing

The ROI has high housing values compared to Prince George's County and Maryland, which may reflect the highly urbanized character of the ROI. Conversely, lower housing values in Prince George's County suggest that the county may be less affluent than surrounding communities in the ROI. The ROI has some of the highest property values in the United States, which may contribute to the disparity in housing values (US Census Bureau, 2018; US Census Bureau, 2019).

Labor Force and Employment

Most of the population over 16 years of age is part of the labor force in the ROI, Prince George's County, and Maryland. The largest industry sectors in the ROI, Prince George's County, and Maryland are 'professional, scientific, and management, and administrative and waste management services;' and 'educational services, and healthcare and social assistance.' The prevalence of these sectors may result from proximal universities, hospitals, government facilities, and similar employers; they indicate that there is a substantial professional workforce located in and around the ROI. Sectors that contain what are traditionally known as 'trade' jobs, such as manufacturing, do not have high incidences of employment across the geographies (i.e., less than 5 percent) (US Census Bureau, 2017f; US Census Bureau, 2018).

Community Services

Two schools and two fire stations are located within a 1-mile radius of the Project Site. No community or public services are located at the Project Site.

Environmental Justice

Minority Populations

CEQ guidance identifies a minority population as an area where the percentage of minorities exceeds 50 percent (CEQ, 1997). Both the EJ ROI and Prince George's County have higher percentages of minority races and persons of a Hispanic or Latino ethnicity compared to Maryland (US Census Bureau, 2017b; US Census Bureau, 2017a). Therefore, an EJ community of concern is present within the EJ ROI with respect to *race* (see **Figure 3.12-3**).

Low-Income Populations

Per CEQ guidance, income levels are compared regionally to determine the presence of EJ communities of concern with respect to income and poverty (CEQ, 1997). The median household income across the ROI, Prince George's County, and Maryland is comparable. A larger income disparity exists regarding per capita income, with a difference of approximately $5,000 per year per person between the highest and lowest level (i.e., Maryland and Prince George's County) (US Census Bureau, 2017c; US Census Bureau, 2017e).

The percentage of the population below the poverty level is also comparable across the ROI, county, and state (i.e., between 9 and 10 percent) (US Census Bureau, 2017d; US Census Bureau, 2017e). As the poverty rates and income levels are comparable across all three geographies, no EJ communities of concern with respect to *low income* are present in the EJ ROI (see **Figure 3.12-4**).

3.12.2 Environmental Effects

This section analyzes the potential effects on socioeconomic resources and EJ communities within the ROI that could occur under the Proposed Action (i.e., Preferred Alternative) and No Action Alternative. The reader is referred to the ***Socioeconomics and Environmental Justice Technical Memorandum*** for a complete discussion of potential effects.

3.12.2.1 No Action Alternative

Under the No Action Alternative, Treasury would not construct or operate the Proposed Action. The Project Site would remain in its current condition, and the existing socioeconomic trends and EJ communities would continue. As such, ***no impacts*** would occur.

3.12.2.2 Preferred Alternative

Socioeconomics

Construction

Construction of the Proposed Action would result in ***beneficial impacts*** on the overall socioeconomic character of the surrounding communities. Construction activities would support or create construction-related jobs, some of which may be local, and most of which would be within the ROI.

Construction of the proposed CPF would support a total of 8,701 job-years, with projected total earnings of approximately $483M. Based on the total anticipated job creation and earnings values, the average wage for these jobs would be approximately $55,281 per job-year, approximately 55 percent higher than the average weighted per capita income in the surrounding census tracts.

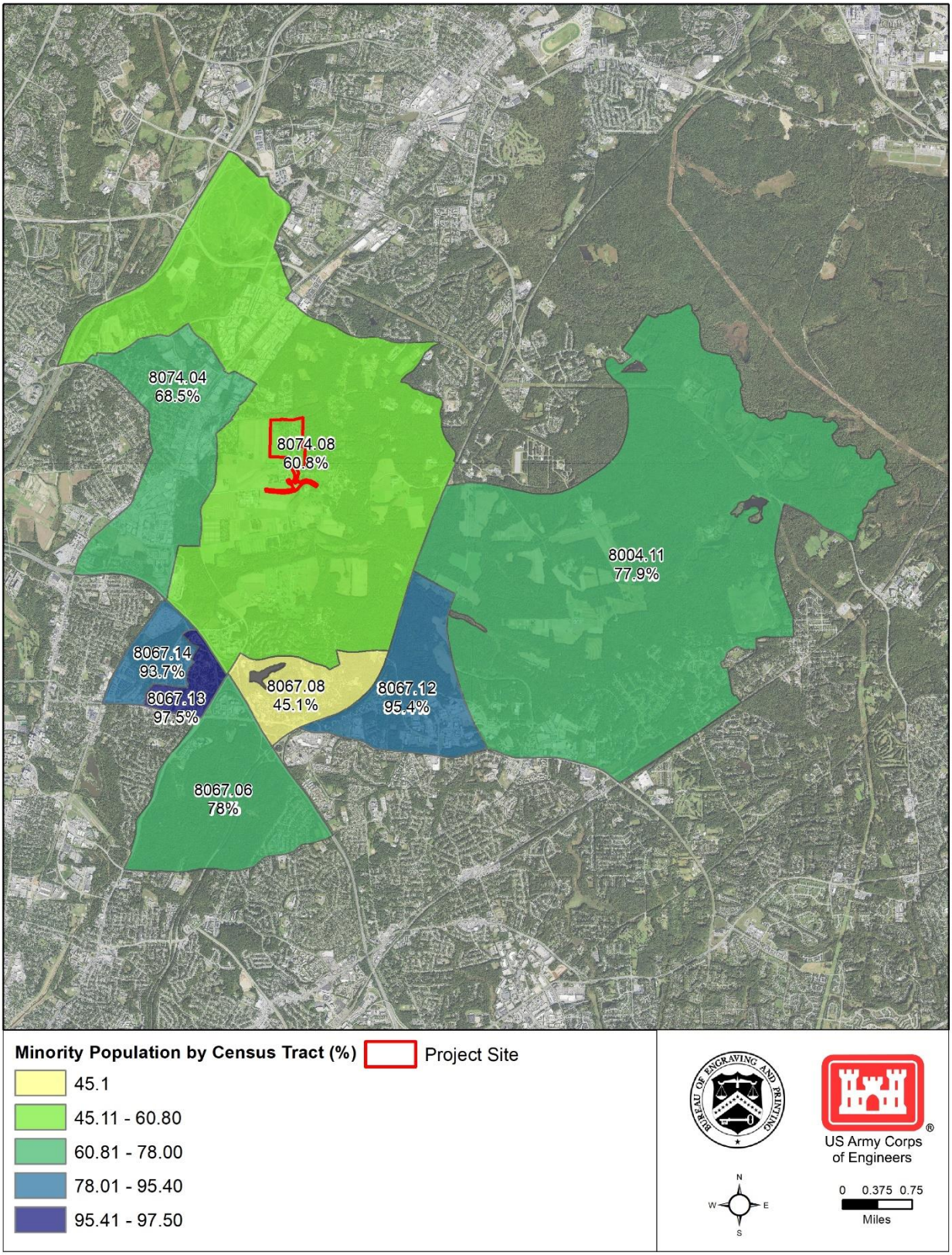


Figure 3.12-3: Minority Populations in the EJ ROI

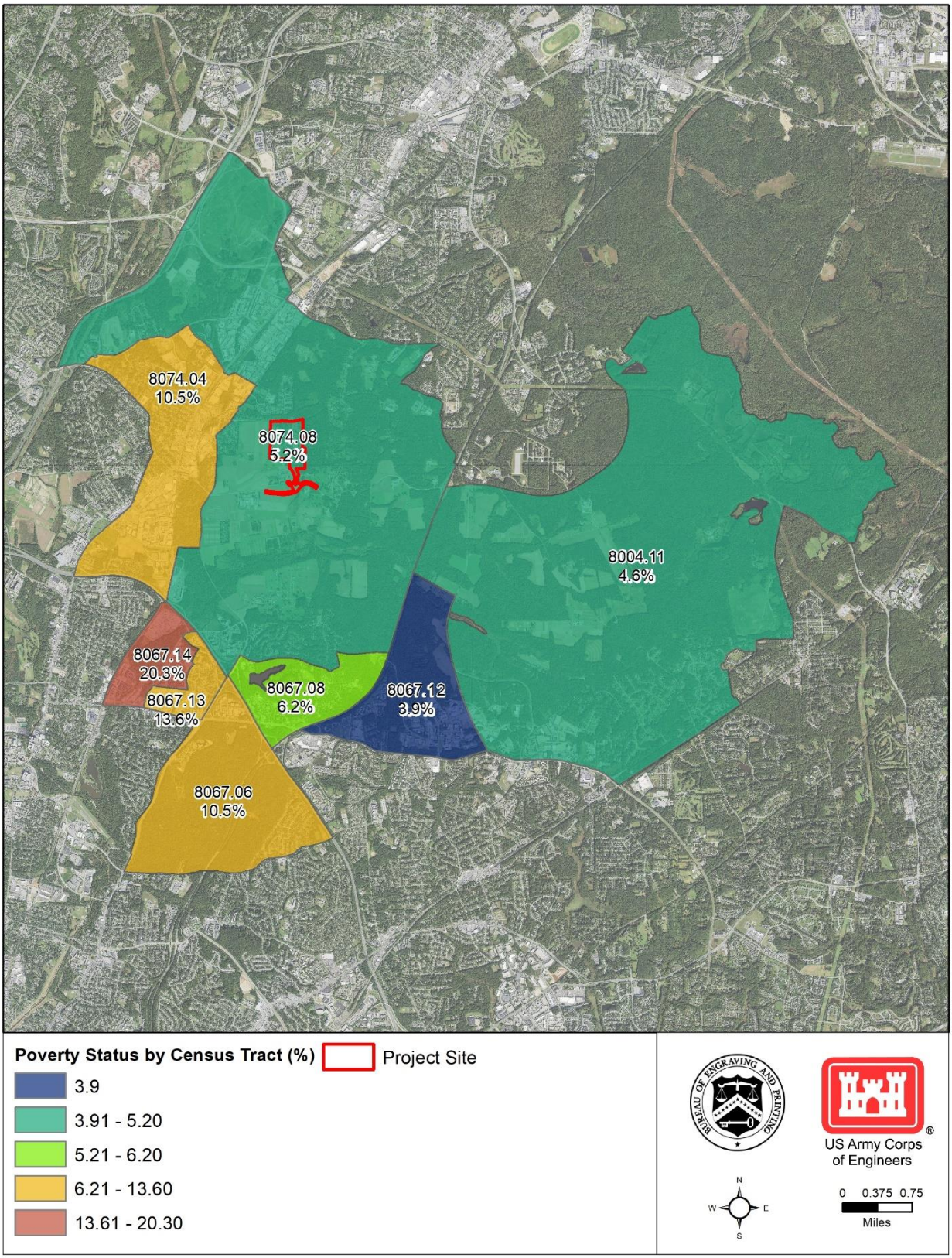


Figure 3.12-4: Low-Income Populations in the EJ ROI

Construction employment would be temporary and last only throughout the four- to five-year construction phase of the Proposed Action. Therefore, the higher wages and the creation of construction jobs would ***not significantly alter*** socioeconomic conditions or labor force characteristics of the ROI.

Treasury's proposed parcel would be transferred between federal agencies, so no residents or community services would be displaced as a result of land acquisition and construction.

Operation

Beneficial impacts on communities near the proposed CPF may result from operation of the proposed CPF due to an increase in local revenues and spending. Employees working at the proposed CPF would likely spend their wages on goods and services located in Prince George's County as they patronize local businesses before, during, and after their shifts.

Operation of the proposed CPF would support an annual total of 7,259 job-years with approximately $414.5M in total earnings. This would be slightly less (by approximately 5 percent) than existing operational employment and earnings at the DC Facility; the DC Facility is currently operationally deficient and requires more expenditures on repairs, thereby supporting greater maintenance employment. As a result, the Preferred Alternative would have a ***less-than-significant adverse impact*** on total employment and total earnings in the ROI. The ROI, however, would retain most of Treasury's current annual expenditures on the DC Facility, including associated employment and earnings.

Operation of the Proposed Action would be expected to have ***no or negligible impacts*** on property and housing values in the ROI. Property values may decrease slightly adjacent to the Project Site as a result of the location of the proposed CPF near this residential community (i.e., the residential community located to the north of the Project Site along Odell Road) and replacement of adjacent open green space with an industrial facility. Conversely, housing values near the Project Site may increase due to the proximity of the proposed CPF, as it would employ Treasury personnel that would relocate from the DC Facility. These personnel may choose to purchase homes in Prince George's County, potentially increasing housing values.

Operation of the proposed CPF would have ***no impact*** on labor force characteristics in the ROI. DC Facility employees, most of whom would transfer to the proposed CPF already reside in the ROI. Approximately 65 percent of the existing DC Facility employees live in Maryland, and of those, 43 percent reside in Prince George's County (BEP, 2019a).

Operation of the proposed CPF would have ***less-than-significant adverse impacts*** on community services in the ROI. The demand for community services may increase near the Project Site if some Treasury personnel move to the local area and use services such as schools, emergency services (see **Section 3.13**), and recreation facilities. Any additional use would not be expected to unduly strain local community resources.

Environmental Justice

Construction

As discussed in **Sections 3.4, 3.5,** and **3.10**, construction of the Proposed Action would result in increased air emissions, noise levels, and traffic congestion in the ROI.

No disproportionate impacts to EJ communities of concern are anticipated with respect to air quality, noise, or traffic. Pollutant emissions and noise levels would be maintained within regulated thresholds during construction activities and would be further minimized through implementation of EPMs. Construction-related traffic would be temporary and construction activities associated with Powder Mill Road would be coordinated with local planning authorities. Potential impacts to bicycle, pedestrian, and

public transit networks would be less than significant. Implementation of EPMs would minimize potential traffic and transportation impacts to the extent practicable.

Operation

Operation of the proposed CPF and resultant adverse environmental impacts, especially those to air, noise, and traffic (see **Sections 3.4, 3.5,** and **3.10**), ***may disproportionately affect*** EJ communities of concern.

Air emissions resulting from operation of the proposed CPF could disproportionately affect surrounding EJ communities of concern. However, estimated emissions would not exceed regulatory thresholds and would be minimized through improved emission controls. With implementation of EPMs and RCMs, potential impacts would be minimized to ***less-than-significant*** levels.

Residences along Odell Road would be most exposed to potential noise impacts; other EJ communities in the ROI would not be affected. ***No disproportionate impacts*** to EJ communities, however, are anticipated with regard to noise, as noise-reduction measures would be implemented during operation to minimize the potential for intrusive noise levels and limit effects to sensitive receptors.

Operation of the proposed CPF would result in increased traffic from employee commutes and delivery truck trips to and from the proposed CPF. This increase in traffic would have significant adverse impacts to the LOS and queue lengths at various intersections within the ROI (see **Section 3.10**), potentially affecting EJ communities of concern located to the north, west, and southwest of the Project Site. Unless mitigated through intersection upgrades, these impacts could disproportionately impact EJ communities, resulting in ***significant adverse impacts*** to these communities.

3.12.3 Mitigation Measures

No project-specific mitigation measures specific to socioeconomics and EJ communities are recommended. Treasury should implement mitigation measures recommended in **Sections 3.4** and **3.10** to reduce potential adverse impacts, including potentially significant adverse impacts to traffic and transportation that could affect EJ communities of concern.

3.13 Hazardous and Toxic Materials and Waste

This section describes HTMW in the Proposed Action's ROI and potential impacts from the Proposed Action (i.e., Preferred Alternative) and No Action Alternative. Measures to reduce potential adverse HTMW impacts from the Proposed Action are identified. Concerns expressed during public scoping regarding HTMW use are considered and addressed. The reader is referred to the ***Hazardous and Toxic Materials and Waste Technical Memorandum*** for additional, more detailed information related to the data presented in each of the following sections.

3.13.1 Affected Environment

3.13.1.1 Region of Influence

The ROI for this analysis includes the Project Site and areas within 0.25 mile of the Project Site (see **Figure 3.13-1**). These are the areas that may have had prior uses that could have resulted in a material effect on the HTMW condition of the Project Site. In addition, these are the same areas that could be affected, directly or indirectly, by activities associated with the Proposed Action. Operational activities that could have an indirect influence on HTMW outside of this ROI would be associated with the transportation of hazardous materials used for, or generated by, CPF manufacturing processes. However, these indirect HTMW impacts associated with the Proposed Action would not be appreciable beyond the ROI.

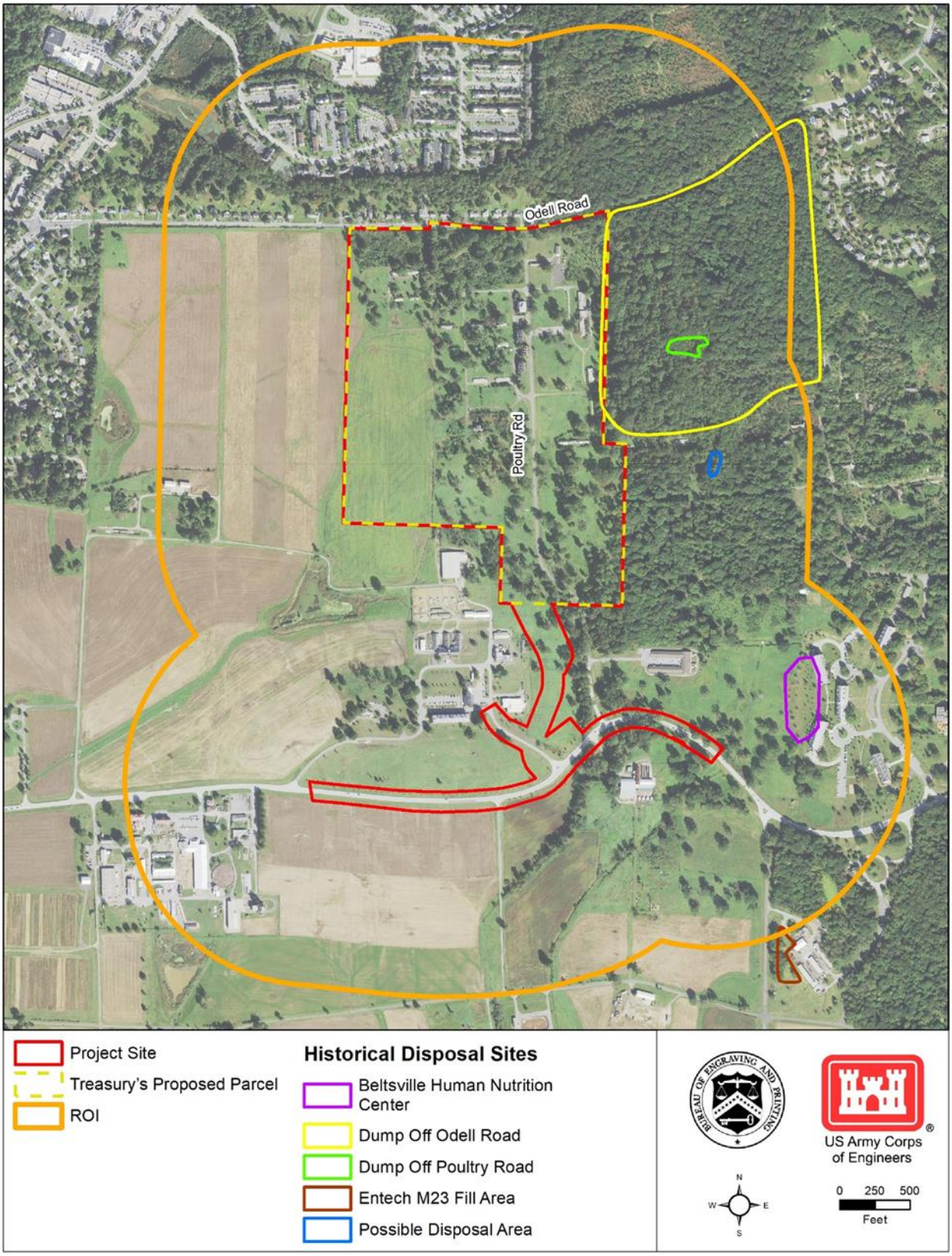


Figure 3.13-1: HTMW ROI

3.13.1.2 Applicable Guidance

Treasury would comply with all federal and state laws and regulations relating to HTMW while constructing and operating the Proposed Action. Please refer to the ***Hazardous and Toxic Materials and Waste Technical Memorandum*** for a complete list of applicable Federal and State guidance and regulations relevant to HTMW.

3.13.1.3 Existing Conditions

Treasury commissioned Project Site investigations to characterize environmental conditions of the Project Site and identify HTMW resulting from past activities in the ROI. An Environmental Condition of Property (ECOP) report identified specific Recognized Environmental Conditions (RECs) within 0.25 mile of Treasury's proposed parcel, including Underground Storage Tanks (USTs), petroleum-related spills, ACMs, LBPs, polychlorinated biphenyls (PCBs), radioactive materials, chemical and biological hazards, rusted equipment, and disposal sites. Most RECs are associated with on-site buildings (see **Figure 3.13-2**); the reader is referred to the ***Hazardous and Toxic Materials and Waste Technical Memorandum*** for a complete list of RECs on the Project Site.

Treasury also analyzed the portion of the Project Site associated with the proposed entrance road and Powder Mill Road modifications. With the exception of two Areas of Concern (AOCs) located within 0.25 mile, but outside, of the Project Site (see **Figure 3.13-1**), no RECs or other HTMW concerns are anticipated in these areas (USDA, 2020).

Based on the RECs identified in the ECOP report, Treasury's proposed parcel qualifies as an ECOP Area Type 2, which is defined as an area or parcel of real property where only the release of petroleum products or their derivatives has occurred (SIA-TPMC, LLC, 2020a). To further evaluate these RECs, Treasury commissioned a Phase II Investigation in Fall 2019 to analyze soil and groundwater samples for potential contamination (see **Figure 3.13-2**) (SIA-TPMC, LLC, 2020b).

The Phase II Investigation identified shallow soil contaminated by the pesticide Mecoprop (MCPP) at two soil sample locations: one next to Building 252 and one next to Building 254 (see **Figure 3.13-2**). High concentration levels of arsenic were also detected in the shallow soil samples; however, these levels were only slightly higher than background concentrations, and considered typical of the area. Average radionuclide concentrations detected in soil were lower than naturally occurring background concentrations. Groundwater sampling results yielded high concentrations of metals (e.g., arsenic, chromium, and lead) that exceeded screening levels; however, these concentrations naturally occur in the soil and sediment in the ROI.

Overall, no elevated HTMW concentrations associated with USTs, petroleum-related spill incidents, or other property conditions (e.g., rusted equipment, radionuclides, and biological and chemical hazards) were detected in the soil or groundwater samples collected within the vicinity of the RECs. Currently, the USDA does not use hazardous materials or generate hazardous waste at the Project Site. Of the three existing operational buildings on the Project Site, one is used for administrative purposes and the other two are used to support poultry research activities.

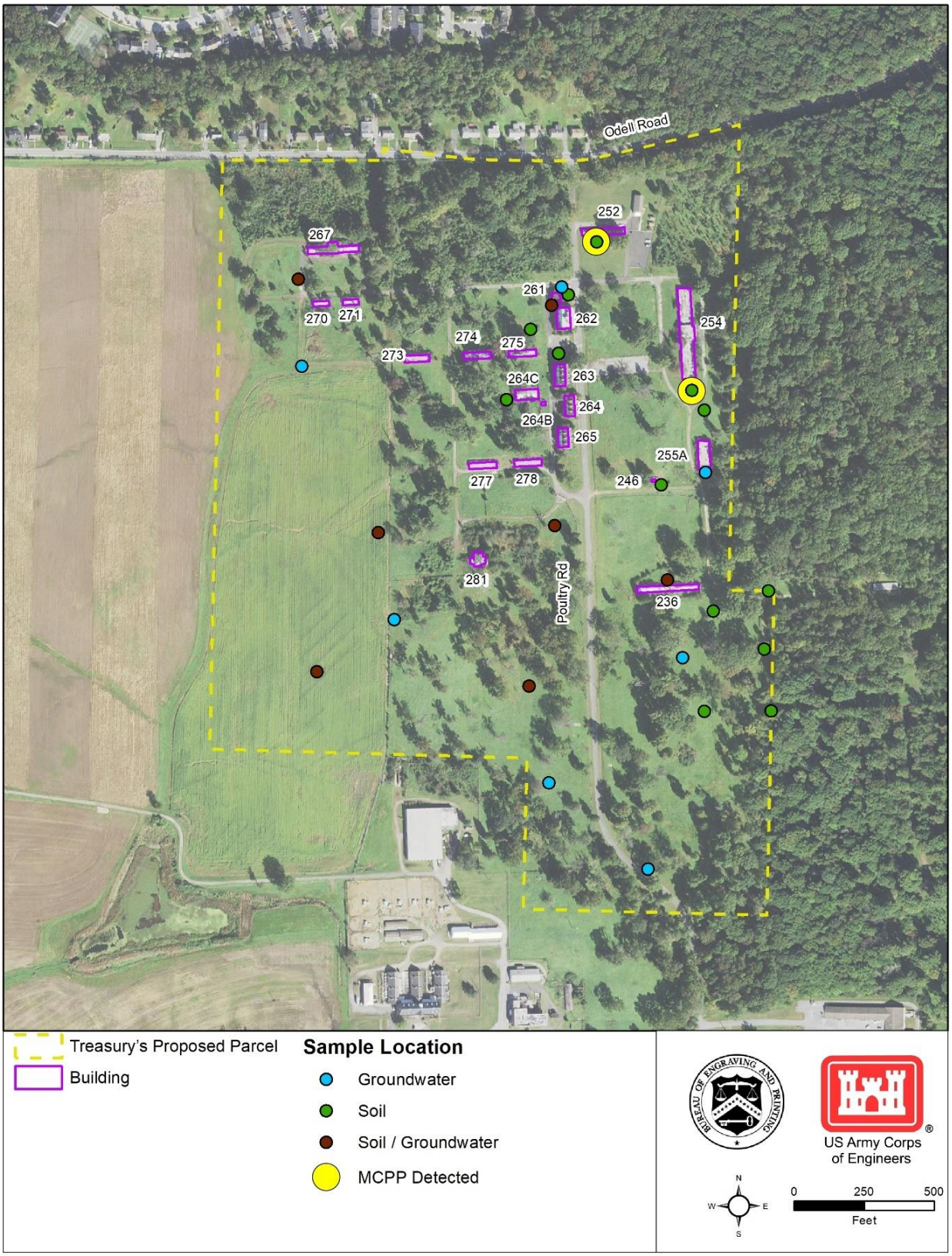


Figure 3.13-2: Soil and Groundwater Sampling Sites within Treasury's Proposed Parcel

3.13.2 Environmental Effects

This section analyzes the potential HTMW impacts within the ROI that could occur under the Proposed Action (i.e., Preferred Alternative) and No Action Alternative. The reader is referred to the ***Hazardous and Toxic Materials and Waste Technical Memorandum*** for a complete discussion of potential effects.

3.13.2.1 No Action Alternative

Under the No Action Alternative, Treasury would not construct or operate the Proposed Action. HTMW conditions within the ROI would not change due to the Proposed Action. The existing facilities within the Project Site would continue to fall into disrepair, potentially releasing existing contaminants into the environment and resulting in a continued ***less-than-significant adverse impact*** on the Project Site and ROI.

3.13.2.2 Preferred Alternative

Construction

Implementation of the Proposed Action would require the demolition of existing buildings within the Project Site that likely contain regulated materials. With implementation of the EPMs and RCMs described in **Section 2.2.4**, the removal and off-site disposal of regulated building materials would result in a ***beneficial impact*** on the environment of the ROI, as these materials would no longer be available for potential release due to lack of building maintenance. No contaminants were detected on-site at concentrations that would pose a risk to construction workers.

The use of construction equipment and vehicles during construction of the Proposed Action would create the potential for discharge, spills, and contamination of commonly used products, such as diesel fuel, gasoline, oil, antifreeze, and lubricants, at the Project Site. All hazardous materials or waste discovered, generated, or used during construction, however, would be handled, containerized, and disposed of in accordance with applicable federal and state regulations. With implementation of the EPMs and RCMs described in **Section 2.2.4**, the potential for accidental releases of HTMW would have ***less-than-significant adverse impacts*** on the Project Site and ROI, which would be minimized to the extent practicable through adherence to these procedures and requirements.

Operation

The proposed CPF would use limited quantities of hazardous materials for the currency production process, as documented in Treasury's Tier II Emergency and Hazardous Chemical Inventory Report to the USEPA (BEP, 2019e). Hazardous materials may include solvents, acids, bases, inks, petroleum-based lubricants, and batteries. When not in use, hazardous materials would be stored in sealed, labeled containers and drums secured in marked cabinets, lockers, and tanks, and with appropriate secondary containment. Any adverse impacts or potential accidental release from the use, handling, or storage of HTMW during operation of the proposed CPF would be ***less than significant***, and managed in accordance with all safety regulations; Treasury has extensive experience handling these materials at the DC Facility and WCF.

The reader is referred to the ***Hazardous and Toxic Materials and Waste Technical Memorandum*** for a summary of the hazardous wastes anticipated to be generated at the proposed CPF in an average year. The proposed CPF would use manufacturing process controls for hazardous waste containment (e.g., site curbs, containment basins), recycling, and on-site treatment of aqueous effluent generated during the production process (e.g., wastewater treatment processes) (BEP, 2019d; Treasury, 2018a). With implementation of EPMs and RCMs described in **Section 2.2.4**, operation of the proposed CPF would have ***less-than-significant adverse impacts*** on the types and quantities of hazardous wastes generated and Treasury's ability to manage these waste streams.

3.13.3 Mitigation Measures

Treasury should implement the following project-specific mitigation measure to further reduce the potential for adverse HTMW impacts:

- Characterize soils during excavation, particularly in the vicinity of Buildings 252 and 254, and route any contaminated soils for proper disposal in accordance with applicable regulations.

3.14 Human Health and Safety

This section describes human health and safety conditions in the Proposed Action's ROI and potential impacts from the Proposed Action (i.e., Preferred Alternative) and No Action Alternative. Measures to reduce potential adverse effects to human health and safety from the Proposed Action are identified. Concerns expressed during public scoping regarding human health and safety are considered and addressed. The reader is referred to the ***Human Health and Safety Technical Memorandum*** for additional, more detailed information related to the data presented here.

3.14.1 Affected Environment

3.14.1.1 Region of Influence

The ROI for human health and safety includes the Project Site and areas within 0.25 mile of the Project Site (see **Figure 3.14-1**). The ROI includes all areas where human health and safety could reasonably be affected by the Proposed Action.

3.14.1.1 Applicable Guidance

Treasury would comply with all federal and state laws and regulations relating to human health and safety while constructing and operating the Proposed Action. Please refer to the ***Human Health and Safety Technical Memorandum*** for a complete list of applicable laws and regulations relevant to human health and safety.

3.14.1.2 Existing Conditions

Treasury

Treasury's Office of Environment, Health, and Safety (OEHS) manages worker health and safety at the DC Facility. OEHS' health and safety goals include maintaining a downward trend in occupational injury and illness rates and engaging personnel at all levels to implement health and safety improvements (BEP, 2017). While Treasury's currency production process is highly automated, OEHS works to minimize exertion and worker fatigue to the extent possible. Supervisory and health and safety personnel are present during all shifts, and Treasury personnel receive periodic training on ergonomics and other safe work practices.

Treasury workers use, handle, and store hazardous materials required for the currency production process in accordance with manufacturer directions, applicable federal and state regulations, and established Treasury procedures. Treasury personnel receive periodic training on the use of hazardous materials and wear appropriate personal protective equipment (PPE) when handling such materials. Workers who use, handle, and store hazardous materials adhere to applicable requirements and procedures that greatly reduce or remove risks to human health and safety (see **Section 3.13**).

Treasury restricts access to its facilities to authorized personnel and visitors. Treasury also maintains an on-site police force to provide security for its facilities and currency shipments, as well as to screen vehicles entering and exiting the facilities for unauthorized cargo and passengers.

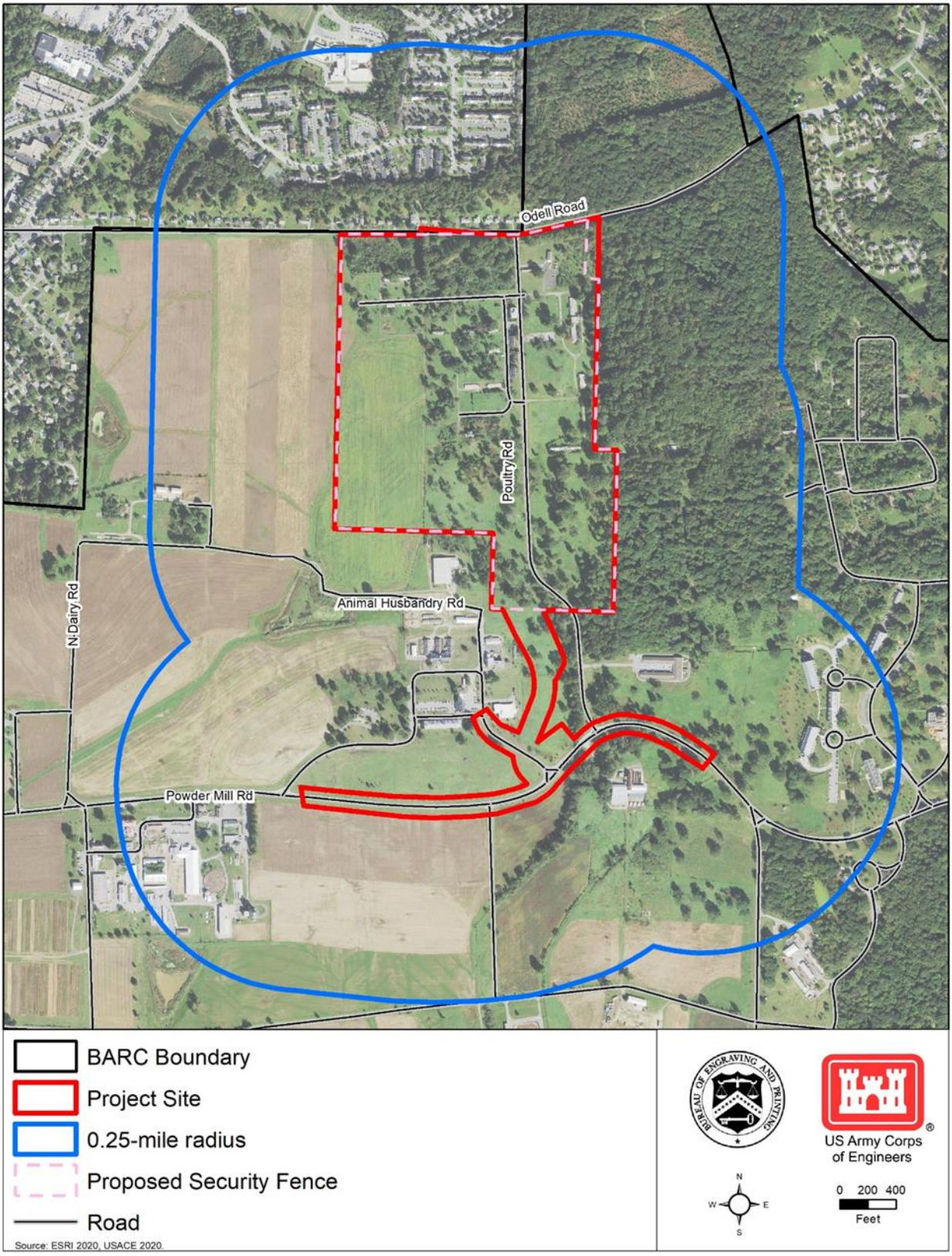


Figure 3.14-1: Human Health and Safety ROI

Potential threats to Treasury facilities include vehicle-borne improvised explosive devices (i.e., "car bombs"), workplace shootings, and unauthorized access by intruders or trespassers. To date, no detonations of intentional harmful explosives or workplace shootings have occurred at any BEP facility, and no BEP personnel or property have been injured or damaged from intruders. The Treasury police force follows established procedures to deter or neutralize perceived threats. Treasury constantly reviews potential threats and updates its training and procedures to respond to such threats.

As noted in **Section 1.4**, the DC Facility's age and physical configuration limit opportunities for health and safety improvements and upgrades. In the DC Facility, manufacturing processes are inefficient and pose safety risks to staff, and fragmented storage across multiple floors, present additional risks to workers. In 2015, 19 of the 23 "lost time" workplace injuries across all BEP facilities were sustained at the DC Facility (BEP, 2018b). Further, the DC Facility's location does not allow Treasury to comply with modern physical security standards (e.g., security setback distances) in accordance with ISC standards (ISC, 2016).

Beltsville Agricultural Research Center

The USDA restricts BARC access to authorized personnel and visitors. Existing safety and security measures include fencing around portions of BARC and security personnel posted at entrances to specific buildings. The USDA provides regular health and safety training for BARC personnel (Treasury, 2018a).

The USDA handles, stores, and disposes of hazardous materials and wastes in accordance with applicable federal and state regulatory requirements; they do not pose a risk to human health (see **Section 3.13**).

Project Site

The Project Site currently has a chain-link security fence along BARC's northern boundary, parallel to Odell Road. This fence contains one locked, unstaffed gate at the northern end of Poultry Road. No additional fencing separates the Project Site from adjacent land within BARC.

As discussed in the ***Hazardous and Toxic Materials and Waste Technical Memorandum*****,** five AOCs were previously identified in the ROI in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA). Following cleanup actions at these AOCs in the late 1990s, the AOCs no longer pose an elevated or unacceptable risk to human health. The AOCs received regulatory closure between 2009 and 2010 (USDA, 2009a; USDA, 2009b; USDA, 2009c; USDA, 2009d; USDA, 2010).

There are medical and first responder services within a 3-mile radius of the Project Site, including the University of Maryland Laurel Medical Center, a Patient First urgent care clinic, the Beltsville Volunteer Fire Department Station 31, and the Beltsville Police Department District 6 Station (UMD, 2019; Patient First, 2020; BVFD, 2020; Prince George's County, 2020).

3.14.2 Environmental Effects

This section analyzes the potential impacts on human health and safety within the ROI that could occur under the Proposed Action (i.e., Preferred Alternative) and the No Action Alternative. The reader is referred to the ***Human Health and Safety Technical Memorandum*** for a complete discussion of potential effects.

3.14.2.1 No Action Alternative

Under the No Action Alternative, Treasury would not construct or operate the Proposed Action at BARC. Treasury would continue to operate the DC Facility in accordance with existing safety and security practices and regulations; however, the DC Facility would likely remain the BEP's most accident-prone (BEP, 2018b). Future opportunities to reconfigure the aging DC Facility to address evolving safety and security risks would continue to be limited, potentially increasing Treasury's susceptibility to workplace accidents or security

incidents (see **Section 3.14.1.2**). Therefore, the No Action Alternative would result in a continued ***less-than-significant adverse impact*** to human health and safety, specifically for Treasury staff.

3.14.2.2 Preferred Alternative

Construction

Normal Activities

Qualified, trained contractors with applicable licenses/certifications would perform construction activities. Construction would not require any specialized construction practices and would be consistent with federal construction process requirements. Both outdoor and indoor construction activities would be performed during daytime working hours in conditions with ample lighting and appropriate weather. Further, all construction activities would be performed within a secured perimeter at the Project Site and would only be accessible to authorized personnel. With implementation of the EPMs and RCMs described in **Section 2.2.4**, normal construction activities would have ***no or negligible adverse impacts*** on construction worker health and safety.

Accidents

Some inherent risk would be present due to the nature of construction work (e.g., physical exertion and strain, use of power and hand tools, presence of open excavations, work near vehicles and heavy equipment). With implementation of the EPMs and RCMs described in **Section 2.2.4**, however, potential construction accidents would have ***less-than-significant adverse impacts*** on construction worker health and safety, and be commensurate with other federal construction projects. BARC employees and the general public would not be affected by construction accidents.

Security and Intentionally Destructive Acts

Potential intentionally destructive acts that could occur during the Proposed Action's construction phase would likely be limited to vandalism, theft of tools and equipment, and similar types of crime. Security measures established during construction would limit and deter unauthorized access and intentionally destructive acts. Potential effects from such acts, should they occur, would likely be contained within the Project Site. Construction of the Proposed Action would be unlikely to induce or increase crime in the ROI. Thus, intentionally destructive acts during construction would have ***no or negligible adverse impacts*** on human health and safety.

Operation

Normal Activities

Except for the entry and exit of vehicles associated with the proposed CPF, no operations would occur outside Treasury's proposed security fence (see **Figure 3.14-1**). Administrative/office and currency production activities at the proposed CPF would be conducted as they currently are at the DC Facility, including for hazardous materials and wastes.

The proposed CPF, however, would have efficiency improvements compared to the DC Facility, increasing the safety of day-to-day activities. Efficient work production flows in the proposed CPF would be flexible and could be easily reconfigured, thereby placing less strain and risk on production staff. Therefore, the proposed CPF would have a ***beneficial impact*** on human health and safety, specifically for Treasury staff.

Accidents

Adherence to training requirements, work practices, and applicable federal and state regulatory requirements would prevent or substantially minimize the potential for accidents at the proposed CPF; this potential would be small, localized, and contained within Treasury's proposed security fence. Due to the

efficiency and work-flow improvements relative to the DC Facility, there would likely be a substantial decrease in the number of workplace injuries as the proposed CPF becomes operational. In the event of staff or visitor injury, qualified personnel would administer first aid immediately and summon first responder services if necessary. Workers or visitors experiencing minor injuries would be transported to the nearest urgent care facility for treatment (see **Section 3.14.1.2**).

Therefore, in the long term, the reduction in the potential for accidents would have a ***beneficial impact*** on human health and safety, specifically for Treasury staff.

Security and Intentionally Destructive Acts

Treasury's police force and required passive and active security measures (see **Section 2.2.1**) would deter, prevent, and neutralize current and future security threats, including measures to respond to acts of terrorism and armed intruders. Treasury's police force would typically resolve unauthorized access situations within seconds or minutes, and intruders and trespassers would likely be infrequent. Treasury's police force presence and security measures would be expected to contain security incidents within the boundaries of Treasury's proposed parcel. Further, natural barriers would augment physical barriers and provide additional levels of protection on-site. Treasury would continue to assess potential security threats to the proposed CPF over time and improve security measures accordingly.

Therefore, the Proposed Action would have a ***beneficial impact*** to Treasury security and staff and a ***less-than-significant adverse impact*** on human safety from the potential for intentionally destructive acts.

3.14.3 Mitigation Measures

No project-specific mitigation measures are recommended.

4.0 Cumulative Effects

4.1 Introduction

As defined by CEQ Regulations in 40 CFR 1508.7, a cumulative impact is that which "results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions."

Cumulative impacts can result from individually minor, but collectively significant, actions expected to occur in a similar location and during a similar time period. **Figure 4.1-1** presents a visual interpretation of cumulative effects resulting from collective actions.

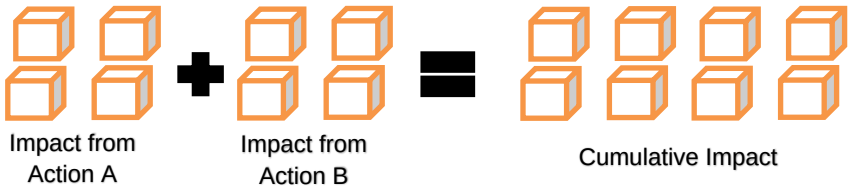


Figure 4.1-1: Visualization of Cumulative Impacts

This section analyzes the potential cumulative effects of the Proposed Action in combination with other past, present, and reasonably foreseeable future actions in the ROI.

Overall, assessing cumulative effects involves defining the scope of the other actions and their interrelationship with the Proposed Action to determine if they overlap in space and time. Concerns expressed during public scoping regarding cumulative effects are considered and addressed. The reader is referred to the ***Cumulative Effects Analysis Technical Memorandum*** for additional, more detailed information related to the data presented in each of the following sections.

4.2 Region of Influence

The ROI for the cumulative effects analysis is the same as the ROI for the analyzed technical resource areas. The ROI comprises areas where the Proposed Action's effects would most likely contribute to cumulative environmental effects.

The temporal scope of the cumulative effects analysis is from 2020 to 2030 (10 years) to include all implementation phases of the Proposed Action (e.g., demolition, construction, operation) and account for any potential delays in the schedule, as well as to capture a reasonable planning horizon for reasonably foreseeable actions in the ROI. Planning beyond that time horizon is speculative at this point.

4.3 Applicable Guidance

In accordance with 40 CFR 1508.7, and as detailed in CEQ guidance entitled *Considering Cumulative Effects Under the National Environmental Policy Act* (1997) and *Memorandum: Guidance on the Considerations of Past Actions in Cumulative Effects Analysis* (24 June 2005), Treasury analyzed the potential cumulative effects that may occur from implementation of the Proposed Action when considered with other past, present, and reasonably foreseeable future actions. Please refer to the ***Cumulative Effects Analysis Technical Memorandum*** for a complete description of applicable federal and state guidance and regulations relevant to cumulative effects.

4.4 Past, Present, and Reasonably Foreseeable Future Projects

Recent, ongoing, and future projects occurring within the ROI may affect the same resources as the Proposed Action, potentially contributing to cumulative effects. These projects include commercial, residential, mixed-use, infrastructure, recreation, and institutional developments. Treasury identified these actions through consultation with the USDA and research of publicly available information sources, such as local master plans, news articles, and federal, state, and local agencies databases.

Although the term "past, present, and reasonably foreseeable future" projects is used in this analysis to describe all considered actions that may interact with the Proposed Action, the cumulative analysis focuses on ongoing and reasonably foreseeable future projects. Specifically, this analysis focuses on those projects that are well-developed, in mature planning stages, and/or have funding secured. Past projects have been included and assessed in the establishment of the environmental baseline and are already considered in the impact analysis presented for each resource area in this EIS (see **Section 3.0**).

Figure 4.5-1 illustrates the location of the past, present, and reasonably foreseeable future projects in relation to the Project Site. Projects are identified and discussed in more detail in the ***Cumulative Effects Analysis Technical Memorandum***.

4.4.1 Impacts of Past, Present, and Reasonably Foreseeable Future Projects

The collective impacts of past, present, and reasonably foreseeable future projects are likely to be similar to the impacts of the Proposed Action and primarily result from construction activities (e.g., increased air emissions, noise, and traffic congestion). Land disturbance from construction of past, present, and reasonably foreseeable future projects may also affect local soils, generate stormwater runoff, and disturb wildlife and vegetation. The temporary nature of construction, as well as the incorporation of standard BMPs, RCMs, and EPMs into the Proposed Action, would ensure that the Proposed Action's contribution to cumulative adverse impacts are minimized to the extent practicable.

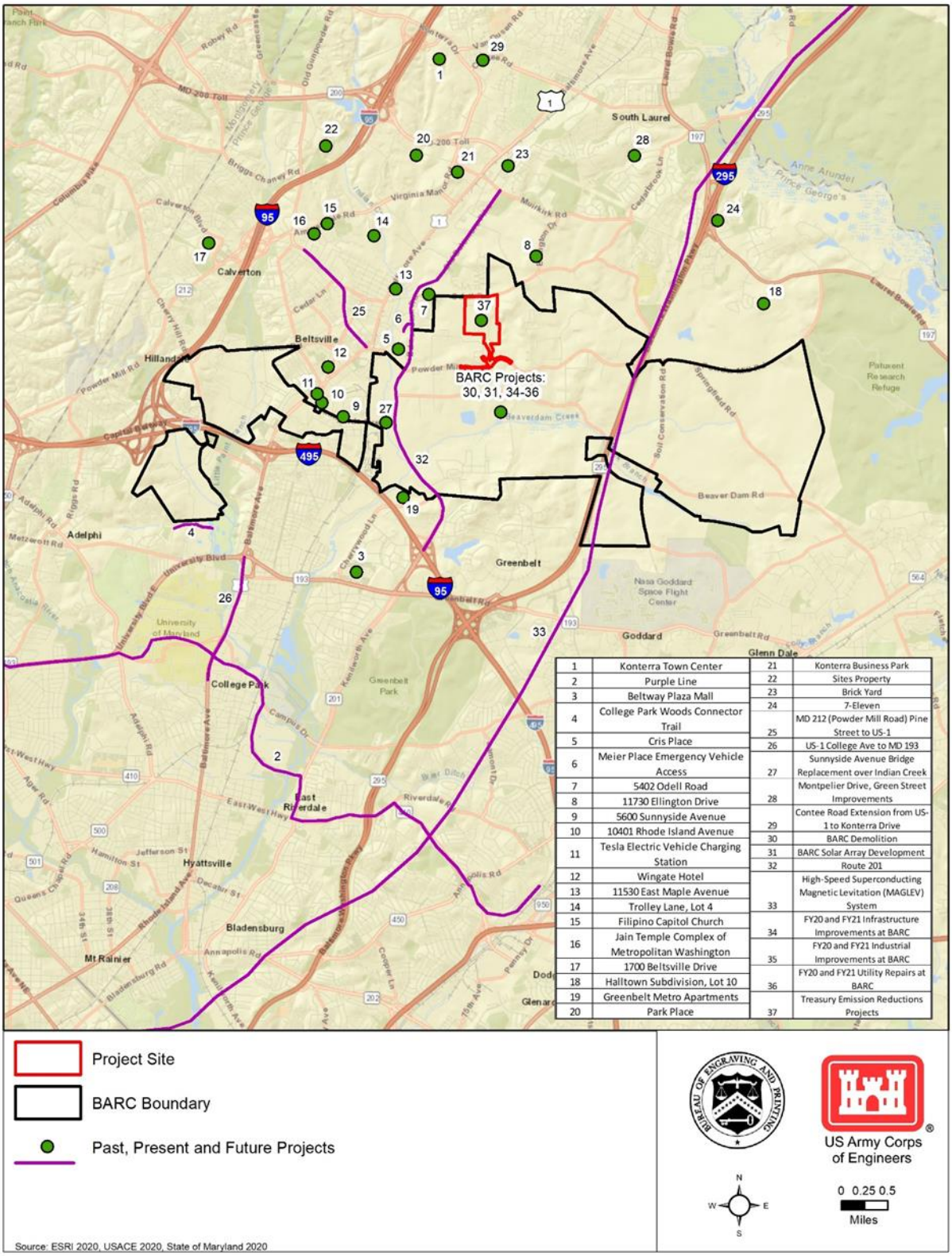
In the long term, employment and associated socioeconomic benefits may occur from operation of larger mixed-use and commercial projects, while transportation improvement projects may benefit traffic and transportation by increasing road capacity and pedestrian/bicycle connectivity, and reduce congestion, travel delays, and mobile emissions. Mixed-use and recreational projects, such as the College Park Woods Connector Trail, may result in long-term beneficial impacts on recreation and land use by increasing and improving land utility and social amenities through redevelopment and the creation of community gathering areas.

4.5 Cumulative Effects of the Proposed Action

This section analyzes the potential cumulative effects that could occur under the Proposed Action (i.e., Preferred Alternative) and No Action Alternative. The reader is referred to the ***Cumulative Effects Analysis Technical Memorandum*** for a complete discussion of potential effects.

4.5.1 Cumulative Impacts under the No Action Alternative

Under the No Action Alternative, Treasury would not construct or operate the Proposed Action. The past, present, and reasonably foreseeable future actions considered in this cumulative analysis would likely still be developed and regional development and growth would continue, regardless of the Proposed Action. The Project Site, however, would continue to degrade and fall into disrepair, resulting in a ***potentially significant adverse cumulative impact*** on cultural resources (e.g., BARC Historic District).



1	Konterra Town Center	21	Konterra Business Park
2	Purple Line	22	Sites Property
3	Beltway Plaza Mall	23	Brick Yard
4	College Park Woods Connector Trail	24	7-Eleven
5	Cris Place	25	MD 212 (Powder Mill Road) Pine Street to US-1
6	Meier Place Emergency Vehicle Access	26	US-1 College Ave to MD 193
7	5402 Odell Road	27	Sunnyside Avenue Bridge Replacement over Indian Creek
8	11730 Ellington Drive	28	Montpelier Drive, Green Street Improvements
9	5600 Sunnyside Avenue	29	Contee Road Extension from US-1 to Konterra Drive
10	10401 Rhode Island Avenue	30	BARC Demolition
11	Tesla Electric Vehicle Charging Station	31	BARC Solar Array Development
12	Wingate Hotel	32	Route 201
13	11530 East Maple Avenue	33	High-Speed Superconducting Magnetic Levitation (MAGLEV) System
14	Trolley Lane, Lot 4	34	FY20 and FY21 Infrastructure Improvements at BARC
15	Filipino Capitol Church	35	FY20 and FY21 Industrial Improvements at BARC
16	Jain Temple Complex of Metropolitan Washington	36	FY20 and FY21 Utility Repairs at BARC
17	1700 Beltsville Drive	37	Treasury Emission Reductions Projects
18	Halltown Subdivision, Lot 10		
19	Greenbelt Metro Apartments		
20	Park Place		

Figure 4.5-1: Past, Present, and Reasonably Foreseeable Future Actions in the Combined ROIs

As no incremental effects would occur to other resource areas under the No Action Alternative, ***no cumulative impacts*** would be expected on these resource areas when considered with past, present, and reasonably foreseeable future projects.

4.5.2 Cumulative Impacts under the Preferred Alternative

Incremental effects of the Preferred Alternative taken into consideration with impacts of past, present, and reasonably foreseeable future projects would primarily result in ***negligible or less-than-significant adverse cumulative impacts*** on: land use; air quality; noise; geology, topography, and soils; water resources; biological resources; visual resources; traffic; utilities; HTMW; and health and safety. Impacts are summarized below.

- Adverse cumulative impacts to technical resource areas would primarily result from temporary construction activities. Construction of the Proposed Action and large-scale past, present, and reasonably foreseeable future projects would require clearing and ground-disturbing activities; collectively increasing air emissions, noise levels, and soil erosion in the ROI; as well as disturbing soils, wildlife, and vegetation; increasing stormwater runoff; and using hazardous materials.
- Construction and operation of the Preferred Alternative considered with past, present, and reasonably foreseeable future projects would result in short- and long-term increases in roadway users and traffic that would be readily absorbed by existing and future road capacity but that could make Powder Mill Road less appealing to bicyclists.
- Implementation of the Preferred Alternative with past, present, and reasonably foreseeable future actions would alter the existing viewshed to residences along Odell Road; although cumulative impacts would not be significant, as the other actions in the ROI are a proposed residence, which would be consistent with the existing landscape, and emissions reductions projects that would occur within the proposed CPF. No other actions in the ROI would result in new permanent light sources.
- Project proponents are expected to minimize adverse cumulative impacts to the extent practicable with implementation of project-specific EPMs and impact reduction measures; thus curtailing individual contribution to adverse cumulative impacts.

The Preferred Alternative would also result in ***beneficial cumulative impacts*** on socioeconomic conditions and health and safety in the ROI.

- An increase in temporary employment to support construction of the Preferred Alternative and past, present, and reasonably foreseeable future projects may result in ***beneficial cumulative impacts*** on socioeconomic conditions. Construction workforces would generate sales, taxes, and revenue at local and state levels while employment temporarily increases. Operation of the Proposed Action may continue to provide additional revenues to the surrounding communities.
- Operation of the Proposed Action and other past, present, and reasonably foreseeable future actions would result in a decrease in accidents or injuries in the ROI. Efficient work production flows and operational improvements in the proposed CPF would reduce the potential for accidents or injuries. Other actions in the ROI would also reduce risk through compliance with OSHA standards and safe work practices. Therefore, the Proposed Action would have *a* ***beneficial cumulative impact*** on human health and safety in the ROI.

Implementation of the Preferred Alternative in conjunction with past, present, and reasonably foreseeable future projects would result in ***potentially significant adverse cumulative impacts*** on water resources, cultural resources, and traffic, as well as ***disproportionate adverse cumulative impacts*** on EJ communities, as discussed below.

- Construction of the Preferred Alternative would result in ***potentially significant adverse cumulative impacts*** on surface water when considered with past, present, and reasonably foreseeable future projects. Construction would permanently impact 226 linear feet of stream, and this impact, when combined with future transportation improvement projects and bridge repairs that may permanently impact surface waters, would contribute to collective impacts in the ROI. Treasury would minimize these project-specific impacts through compliance with Sections 404/401 of the CWA.

- Operation of the Proposed Action would have a ***potentially significant adverse cumulative impact*** on the BARC Historic District's viewshed, when considered with other actions proposed for development in the BARC Historic District. The Preferred Alternative when considered with these other actions would contribute toward a diminished integrity of the BARC Historic District's character-defining viewsheds and landscape design, setting, and feeling.

- The addition of anticipated traffic from the Proposed Action would result in ***potentially significant adverse cumulative impacts*** on the LOS at local intersections; queue lengths at certain intersections would increase as well. Cumulative impacts would be temporary and only result during construction of past, present, and foreseeable future actions, as these actions would not affect traffic conditions in the long term. Treasury would consider applicable mitigation measures to reduce the Proposed Action's contribution to cumulative impacts to ***less-than-significant*** levels.

- Construction of the Preferred Alternative and past, present, and reasonably foreseeable future projects would increase air emissions, noise levels, and traffic congestion near development sites. Although the Preferred Alternative itself is not expected to result in significant effects on EJ communities during construction, it may contribute to ***disproportionate adverse cumulative impacts*** on EJ communities when taken into consideration with other construction activities in the ROI. Given the temporary and phased nature of construction, cumulative impacts on EJ communities would not result in long-term exposure. Further, adherence to federal, state, and local regulations, as well as the implementation of EPMs would minimize cumulative air emissions and noise to ***less-than-significant*** levels.

- Operation of the Proposed Action and past, present, and reasonably foreseeable future projects would generate air emissions from operational activities that would result in ***disproportionate adverse cumulative impacts*** on surrounding EJ communities**,** specifically minority populations in Census Tract 8074.08. Estimated emissions under the Preferred Alternative would not exceed regulatory thresholds and would be minimized through improved emission controls and operational efficiency associated with the proposed CPF. Taken into consideration with emissions from other actions in the ROI, cumulative impacts on EJ communities would occur. Similarly, increased traffic from operation of the Proposed Action and other actions in the ROI would increase traffic volume and degrade LOS conditions within surrounding EJ communities. With project-specific adherence to appropriate air quality permits and compliance with applicable emission standards and transportation regulations, cumulative impacts would be minimized to ***less-than-significant*** levels.

4.6 Cumulative Mitigation Measures

The mitigation measures identified for each specific resource area (see **Section 5.5**) would further serve to reduce the Proposed Action's contribution to adverse cumulative impacts; therefore, no mitigation measures are proposed for cumulative effects. Project-specific mitigation would minimize cumulative adverse impacts to the greatest extent practicable; although, significant adverse cumulative impacts on cultural resources would remain.

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5.0 Conclusions and Other Related Disclosures

In accordance with Section 102 of NEPA (42 USC 4332(C)(i, ii, iv, and v)), this section discusses the:

- Relationship between short-term uses of the environment and the maintenance and enhancement of long-term productivity of the Proposed Action.
- Irreversible and irretrievable commitments of resources associated with implementation of the Proposed Action.
- Potential significant and non-significant impacts of the Proposed Action.

Treasury summarizes and compares potential impacts across the Alternatives in **Table 5.5-1** to provide a "clear basis of choice" for the federal decision-maker.

Recommended mitigation measures, including those that could mitigate potentially significant adverse impacts to less-than-significant or acceptable levels, are summarized in **Section 5.5**. Any unmitigable potentially significant adverse impacts are identified.

5.1 Relationship Between Short-term Use of the Environment and the Maintenance and Enhancement of Long-term Productivity

This analysis focuses on the "trade off" between environmental impacts and Proposed Action outcomes. The Proposed Action would replace Treasury's operationally deficient DC Facility with a modern, scalable, sufficiently sized production facility that would result in more efficient, streamlined currency production. Further, the Proposed Action would allow Treasury to retain its current, uniquely skilled workforce; improve the health and safety of its personnel; comply with federal facility security standards; and reduce its federal footprint within the NCR (see **Section 1.4**).

To achieve this outcome that meets Treasury's purpose of and need for action, certain environmental resources would be adversely impacted at the Project Site and the surrounding ROIs during the life of the Proposed Action (i.e., approximately 50 years). Conversely, certain environmental resources would benefit.

Construction would remove approximately 83.6 acres of vegetation from the Project Site, including 3.6 acres of forest and 125 specimen trees; convert approximately 86.5 acres of FPPA-designated soils into developed, industrial land use; divert or fill approximately 226 linear feet of a jurisdictional intermittent stream, fill 0.73 acre of isolated wetlands and 0.21 acre of potentially jurisdictional wetlands, and impact 0.65 acre of associated MDE-regulated wetland buffer; and demolish 22 contributing resources to the BARC Historic District.

Construction would also disturb on-site soils; increase the potential for erosion and downslope sedimentation, with consequent impacts to water quality; disturb wildlife; increase traffic; increase the potential for accidental HTMW releases and contaminant mobilization; result in temporary utility disruptions; produce visual impacts to nearby residences; and have impacts on the local noise and air quality environments.

Operation would increase local noise; increase nighttime lighting; produce visual impacts to adjacent residential areas; increase air emissions; degrade traffic conditions (including potential effects to EJ communities); and disturb or displace wildlife.

The Proposed Action would also result in beneficial environmental effects. The Proposed Action would remove and dispose of regulated hazardous building materials on the Project Site, preventing future releases of these materials into the environment. Human health and safety would improve, particularly for Treasury employees, as they phase into the proposed, modern CPF and out of the operationally deficient and relatively less safe DC Facility. Utility connections at the Project Site would improve, and, when

compared to existing DC Facility emissions, VOC emissions from the proposed CPF would decrease due to improved emission controls and operational efficiencies. GI/LID measures incorporated into the proposed CPF would reduce energy consumption. Economic benefits would be realized from both construction and operation. Existing rumble strips on Powder Mill Road that cause noise complaints would be removed.

Most potential adverse impacts would remain at negligible or less-than-significant levels with implementation of the EPMs and RCMs incorporated into the Proposed Action (see **Table 2.2-1**). Treasury could implement mitigation measures identified in this EIS to reduce the potentially significant adverse impacts to visual resources, water resources, cultural resources, and traffic and transportation (and associated disproportionate adverse traffic impacts on EJ communities of concern) (see **Section 5.5**) should they so choose. Treasury's determination of the mitigation measures to be implemented will be documented in the ROD.

Construction is expected to last approximately 5 years (i.e., approximately 2021 through 2025). Construction-related effects, therefore, would be primarily temporary, but some impacts resulting from construction, such as vegetation removal, wetland filling, cultural resource disturbance, and infrastructure construction, would have long-term effects.

Once the proposed CPF is constructed, Treasury would gradually transition personnel and operations from the DC Facility in phases from approximately 2025 to 2029 and currency manufacturing at the DC Facility would be phased out. The fully operational CPF would continue to produce environmental impacts, such as nighttime lighting, noise, air emissions, and traffic, for at least the next 50 years.

Most potential long-term impacts would be maintained at less-than-significant levels through implementation of EPMs and RCMs, although impacts to traffic (and therefore EJ communities of concern), visual resources, and cultural resources would remain potentially significant unless recommended mitigation measures are implemented.

Following the useful life of the proposed CPF, the CPF would either be retrofitted/renovated to meet Treasury's need at that time, repurposed for another use, or demolished. If repurposed for another use, improved infrastructure, stormwater features, and utilities would be expected to be maintained. If demolished, the lasting effects of the Proposed Action on the environment would be minimal as the site would revert to natural conditions. Therefore, long-term productivity of the environment itself would not be significantly compromised by the Proposed Action.

5.2 Irreversible and Irretrievable Commitment of Resources

For the purposes of this analysis and in consonance with NEPA, irreversible means a "one-way equation;" that is, once the resource impact occurs, it cannot be recovered in a reasonable period of time, generally defined as 100 years, or at all. Irreversible effects primarily result from the use or destruction of a specific resource (e.g., energy from hydrocarbons) that cannot be replaced. Irretrievable, however, is reversible; an irretrievable commitment impacts a resource for a period of time, then the resource can again be available for use or can re-establish in its original condition. Irreversible or irretrievable resource commitments involve the loss in value of an affected resource to these two varying extents.

Construction and operation of the proposed CPF would consume electricity, hydrocarbon fuels, and water. Construction would require the use construction materials, such as concrete, quarried stone, asphalt, and soil. Construction materials would be recycled and soil reused on-site to the extent practicable; however, some irreversible resource loss would result. The hydrocarbon-based energy required to conduct these activities or to procure the finished materials and clean soil would be irreversibly lost.

The Proposed Action would convert or displace land and natural resources (e.g., wetlands, vegetation, wildlife, and FPPA-designated soils). Wetlands and FPPA-designated soils would be lost irreversibly, as

these resources would not naturally reestablish if the Project Site were ever demolished. Vegetation and wildlife would be anticipated to reestablish on the Project Site if the proposed CPF were demolished, rendering this only an irretrievable commitment of these resources.

The demolition of contributing architectural history resources to the BARC Historic District would be considered irreversible commitments. These resources, however, would be documented and preserved in accordance with the NHPA and would further contribute to the body of human knowledge about our past.

5.3 Impacts Found Not to be Significant

All resource areas would experience negligible or less-than-significant adverse impacts from construction and/or operation of the proposed CPF (i.e., the Preferred Alternative). Some resource areas (i.e., air quality, noise, utilities, socioeconomics, HTMW, and human health and safety) would also experience beneficial impacts.

The No Action Alternative would be expected to have no or less-than-significant adverse impacts on all resource areas, except for biological resources (which would have a minor beneficial impact) and cultural resources and traffic and transportation (which would experience significant adverse impacts; see **Section 5.4**).

Beneficial and less-than-significant adverse impacts anticipated under the Preferred Alternative and the No Action Alternative are summarized in **Table 5.5-1**.

5.4 Significant and Unavoidable Adverse Impacts

Implementation of the Proposed Action would result in potentially significant adverse impacts to visual resources, water resources, EJ communities of concern (due to disproportionate adverse traffic impacts), cultural resources, and traffic and transportation. All significant adverse impacts could be reduced to less-than-significant levels with implementation of recommended mitigation measures for each of these resource areas.

The No Action Alternative would have a significant adverse impact on cultural resources, specifically due to continued deterioration of architectural history resources; this impact could be avoided if those resources were maintained. The No Action Alternative would also have a continued significant adverse impact on traffic and transportation as several local intersections are failing or have unacceptable queue lengths under existing conditions. Impacts anticipated under the Preferred Alternative and No Action Alternative, including significant adverse impacts, are summarized in **Table 5.5-1**.

5.5 Mitigation Identified

The Proposed Action proactively includes the EPMs and RCMs set forth in **Table 2.2-1**. These measures are incorporated into the Proposed Action to reduce environmental effects through “mitigation by design.” These measures are *not* considered mitigation measures in this EIS as they are proactive measures that would reduce adverse effects under the Preferred Alternative.

3220 **Table 5.5-1: Summary of Potential Environmental Impacts on Evaluated Resource Areas[1]**

Resource Area	No Action Alternative	Preferred Alternative
Land Use	Less-than-significant adverse impact on land use in ROI from existing buildings falling into disrepair; no impact to zoning.	*Construction:* Less-than-significant adverse impact on surrounding land uses from construction activities. *Operation:* Less-than-significant adverse impact on land use and local planning objectives from the conversion of agricultural land to industrial land; no or negligible impact from new development in response to the proposed CPF; less-than-significant adverse impact to local zoning.
Visual Resources	Less-than-significant adverse impact to residences along Odell Road from deteriorating buildings.	*Construction:* Negligible adverse impacts for motorists; less-than-significant adverse impacts to residences along Odell Road due to views of construction activities; no impact to nighttime lighting levels. *Operation:* Less-than-significant adverse impacts to views from roadways; **potentially significant adverse impacts** to viewscapes from residences along Odell Road; negligible adverse impacts along Powder Mill Road from a new traffic control device; **potentially significant adverse impacts** on nighttime lighting levels for residences along Odell Road.
Air Quality	No impact on air quality.	*Construction:* Less-than-significant adverse impacts from criteria pollutant, fugitive dust, and GHG emissions; negligible adverse impacts from HAP emissions. *Operation:* Beneficial impacts from a reduction in VOC emissions compared to the DC Facility; less-than-significant adverse impacts from non-VOC criteria pollutant emissions; no impact from fugitive dust emissions; less-than-significant adverse impacts from HAP and TAP emissions; no perceptible change in regional impact from GHG emissions as new GHG emissions from proposed CPF would be offset by reduction of GHG emissions from DC Facility.
Noise	No impact on noise environment.	*Construction:* Less-than-significant adverse impacts on noise-sensitive receptors from construction activities. *Operation:* Negligible adverse impacts on noise levels from operational equipment and daytime vehicle and truck traffic; less-than-significant adverse impacts on sensitive receptors around the Project Site from nighttime truck traffic traveling through BARC; beneficial impacts to noise-sensitive receptors from the removal of rumble strips on Powder Mill Road.
Geology, Topography, and Soils	No impact to geology, topography, or soils.	*Construction:* No or negligible adverse impact to soils from vegetation removal and compaction; no impact to geology or topography *Operation:* No or negligible adverse impact from stormwater runoff; no significant impact to designated farmland soils; no impact to geology or topography.
Water Resources	No impact on water resources.	*Construction:* **Potentially significant adverse impacts** on two intermittent streams from diversion and permanent fill; no or negligible adverse impacts on surface waters from erosion and sedimentation; no or negligible adverse impact on stormwater from ground disturbance; less-than-significant adverse impacts on wetlands from permanent fill; less-than-significant adverse impact on groundwater

Resource Area	No Action Alternative	Preferred Alternative
		from excavation and potential contaminant mobilization; no adverse impact to the coastal zone. *Operation:* Less-than-significant adverse impact on surface water flow from wastewater discharge; no impact to on-site surface water from withdrawals or in-water work; no or negligible adverse impact to stormwater from changes in Project Site hydrology; no impact on wetlands; no impact to groundwater quality; negligible impacts to groundwater supply; no adverse impact to the coastal zone.
Biological Resources	Minor beneficial impact on biological resources from reduced human activity at the Project Site.	*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.
Cultural Resources	No impact on archaeological resources. **Significant adverse impact** on the BARC Historic District and its contributing resources due to building neglect and deterioration.	*Construction:* No impact to one potentially NRHP-eligible archaeological site; less-than-significant adverse impacts on previously unknown archaeological sites if discovered during construction; less-than-significant adverse impact from the demolition of 22 contributing resources to the BARC Historic District. *Operation:* No impact on archaeological resources; **significant adverse impact** on the visual environment from the demolition of buildings and structures within the BARC Historic District and introduction and operation of the proposed CPF into the previously cohesive landscape.
Traffic and Transportation	Treasury would have no impact on traffic or transportation. However, regional background growth of the area would result in: Less-than-significant adverse impacts on traffic and public transit and negligible impacts on pedestrian and bicycle facilities in the regional ROI. **Significant adverse impact** (continued from current conditions) on one intersection in the local ROI from failing LOS and beneficial LOS impacts to two intersections. Less-than-significant adverse impact to	*Construction:* No impact on roadways in the regional ROI; less-than-significant adverse impact on traffic in the local ROI from construction worker commutes; less-than-significant adverse impact to local traffic from temporary closures on Powder Mill Road; no impact to parking or the pedestrian network; less-than-significant adverse impact to the bicycle network; negligible adverse impact to public transit from increased ridership. *Operation:* Negligible adverse impact on roadways in the regional ROI; no impact from increased truck traffic in the regional ROI; less-than-significant adverse impact from increased truck traffic in the local ROI; less-than-significant adverse impact to local traffic during congested periods; less-than-significant adverse impacts to intersections due to longer delays; **significant adverse impacts** to six intersections from a failing LOS; less-than-significant adverse impacts to intersections due to longer queue lengths; **significant adverse impacts** to one intersection from failing queue lengths; no impact to parking; minor adverse impact to the pedestrian and

Resource Area	No Action Alternative	Preferred Alternative
	intersections from longer queue lengths in ROI, except for **significant adverse impacts** (continued from current conditions) on two intersections; and beneficial impacts at one intersection.	bicycle network; negligible adverse impacts to public transit from increased ridership.
Utilities	No impact on utilities.	*Construction:* No impact on utility supply or to non-BARC end users; negligible adverse impacts from temporary service disruptions of natural gas and water utilities; beneficial impact to BARC from improved utility efficiency. *Operation:* Negligible adverse impacts on utility demand and availability from increased usage.
Socioeconomics and Environmental Justice	No impact to the socioeconomic environment or EJ communities.	*Construction:* Beneficial impacts on the overall socioeconomic character of surrounding communities; no significant changes to socioeconomic conditions; no disproportionate impacts on EJ communities of concern from air quality, noise, and traffic and transportation. *Operation:* Beneficial impacts on communities from an increase in local revenues and spending; less-than-significant adverse impact on total employment and total earnings; no or negligible impacts on property values or labor force characteristics; less-than-significant adverse impacts on community services; less-than-significant disproportionate impacts on EJ communities from air emissions; no disproportionate impacts on EJ communities from noise; **significant adverse impacts** on EJ communities from increased traffic.
Hazardous and Toxic Materials and Waste	Less-than-significant adverse impact from existing buildings falling into disrepair.	*Construction:* Less-than-significant adverse impact from accidental release of HTMW; beneficial impact from removal and off-site disposal of regulated building materials. *Operation:* Less-than-significant adverse impacts from the potential accidental release from the use, handling, or storage of HTMW; less-than-significant adverse impact on the types and quantities of waste generated and Treasury's ability to manage these wastes.
Human Health and Safety	Less-than-significant adverse impact from the continued use of the DC Facility and the inability to address safety and security risks, specifically for Treasury staff.	*Construction:* No or negligible adverse impacts on construction worker safety from normal construction activities; less-than-significant adverse impact from inherent construction risks and potential for accidents; no or negligible adverse impacts from intentionally destructive acts. *Operation:* Beneficial impact on health and safety for Treasury staff from more efficient production flows, a reduction in the potential for worker accidents, and improved passive and active security measures; less-than-significant adverse impact from the potential for intentionally destructive acts.

1. In the "No Action Alternative" and "Preferred Alternative" columns, **bold typeface** identifies potentially significant adverse impacts.

Treasury identified additional, recommended mitigation measures to reduce potential adverse impacts that would not be sufficiently reduced through EPMs and RCMs. Treasury identified mitigation measures in accordance with the CEQ NEPA Regulation (40 CFR 1508.20) and Treasury's NEPA Regulation (TD 75-02) to either:

(1) Avoid the impact altogether by not taking a certain action or parts of an action.
(2) Minimize the impacts by limiting the degree or magnitude of the action and its implementation.
(3) Rectify the impact by repairing, rehabilitating, or restoring the affected environment.
(4) Reduce or eliminate the impact over time by preservation and maintenance operations during the life of the action.
(5) Compensate for the impact by replacing or providing substitute resources or environments.

Treasury could implement the specific mitigation measures listed below to further reduce adverse impacts to associated resource areas. The specific mitigation measures that Treasury would implement will be identified, as appropriate, in the ROD.

Land Use:

- Although not required, obtain a zoning reclassification of Treasury's proposed parcel from the Prince George's County Planning Department's Development Review Division from "Residential" to "Industrial."

Visual Resources:

- 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 within the ROI. Use fencing that resembles residential fencing and does not appear threatening to adjacent viewers.
- 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.
- Use a spectrum of light generally perceived as more natural, such as light-emitting diode (i.e., LED), metal halide, or halogen elements.
- Avoid high-intensity discharge (i.e., HID) or fluorescent lights (except compact fluorescent bulbs that screw into standard sockets) on the exterior of buildings.

Water Resources:

- As an alternative to diverting approximately 117 linear feet of the unnamed intermittent stream on-site, modify the LOD associated with proposed entrance road upgrades and the proposed vehicle entry control facility to avoid this stream.
- Conduct excavation activities at the Project Site when the groundwater table is seasonally lower (e.g., late summer or early fall) to minimize potential encounters with this resource.

Biological Resources:

- Apply voluntary conservation measures to reduce potential impacts to the NLEB, as identified in the NLEB Programmatic Biological Opinion. These measures may include avoiding tree removal activities within the NLEB pup season (June 1 to July 31) and/or the active season (April 1 to October 31).

- Construct and maintain the proposed stormwater management features to provide as much wildlife habitat value as possible.

Cultural Resources:

- Plant native and habitat-appropriate trees and vegetation on the Project Site that would limit views of the proposed CPF from potions of the BARC Historic District outside the Project Site (including from the 16 off-site, but on-BARC, contributing resources), as well as plant additional native and habitat-appropriate trees and vegetation along the northern and western boundary of the Project Site to obscure lines-of-site from these areas.
- Design the proposed CPF using architectural styles that minimize potential adverse impacts to the viewshed.

Traffic and Transportation:

- Design and implement mitigation measures for Intersections 6, 8, 10, 12, 13, and 14 (see **Section 3.10.3**).
- In consultation with local planning authorities, implement traffic-calming devices (e.g., speed bumps), reduce speed limits, and/or create pedestrian/bicycle lanes along roadways in the local ROI, such as Powder Mill Road. Rumble strips should be avoided, if feasible, as the existing rumble strips on Powder Mill Road have generated noise complaints from both the surrounding community and BARC employees.
- Incorporate pedestrian/bicycle amenities into the Preferred Alternative during the design process.
- Consult with WMATA regarding the opportunity to adjust Metrobus routes such that they serve the proposed CPF more effectively (e.g., installing 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.

Hazardous and Toxic Materials and Waste

- Characterize soils during excavation, particularly in the vicinity of Buildings 252 and 254, and route any contaminated soils for proper disposal in accordance with applicable requirements.

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7.0 List of Preparers

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Heather Cisar, NEPA Program Manager

Maria Franks, Supervisor, Community Planner

Harvey Johnson, Baltimore District Chief

Michael Schuster, Planning Division, Installation Support Branch Chief, Community Planner

Eva Falls, Section 106 Coordinator, Archaeologist

Lauren Joyal, Ecologist

Dan Cockerham, Ecologist

Matt Breitenother, Community Planner

7.3 Consultants – AECOM and Mabbett

Table 7.3-1: Consultant Contributors to EIS

Name	Education	EIS Role	Years of Experience
Anolik, Allison	BA, Geography	Traffic and Transportation	14
Benton, Charles	BA, Environmental Science	Biological Resources	23
Boose, Brian W., CEP	BS, Biological Sciences/Ecology	Program Manager; Senior QA/QC	32
Busam, Michael, AWB®	BS, Environmental Science and Policy	Project Manager	5
Carver, Craig, AICP	Master of Urban and Regional Planning	Human Health and Safety; Water Resources	10
Dover, Robert, PG	MS, Geology	Geology, Topography, and Soils; HTMW	34
Glucksman, Andrew, LEED AP	MS, Agronomy	Land Use; HTMW	19
Kisak, Natalie	BA, Environmental Studies, Public Policy	Water Resources; Socioeconomics; Utilities	1
Koziarksi, Ralph, Ph.D.	Doctorate in Anthropology	Cultural Resources	17
Kyzar, Carrie	MS, Environmental Management	Land Use; HTMW	18

Name	Education	EIS Role	Years of Experience
Liguori, Stephanie, CNRP	BS, Environmental Science	Air Quality; Traffic and Transportation	8
Lytle, Melanie	Master of Historic Preservation	Cultural Resources	14
Mandrup-Poulsen, Justin	MS, Geographic Information Systems	GIS Analysis and Graphics	5
McGovern, Rebecca	BA, Historic Preservation	Cultural Resources	3
Minichino, Brian	BS, Chemistry	Noise; Air Quality	11
Moreland, Patrick	BS, Soil Science	Water Resources	17
Norris, Brian	MS, Geography	GIS Analysis and Graphics	5
Obenland, Benjamin	BS, Environmental Science and Policy	Biological Resources; Geology, Topography, and Soils	1
Prakash, Jagadish, AICP	Master of City and Regional Planning	Socioeconomics	16
Robertson, Michael	Master of Environmental Studies	Senior Technical Advisor; Senior QA/QC	16
Sale, Claire, AICP	Master of Regional Planning	Visual Resources	20
Seibel, Scott, RPA	MS, Archaeomaterials	Cultural Resources	22
Warf, Jennifer	MS, Environmental Studies	Senior Technical Advisor; Senior QA/QC	18
Wu, Charlene	Master of Environmental Management	Cumulative Impacts; Utilities; Socioeconomics	7

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8.0 Distribution List

Treasury notified the following elected government officials, local and regional administrators, Federal and State agencies, commissions, citizen advisory groups, local interest groups and persons, and Native American Tribes with an interest in the Proposed Action of the availability of this EIS for review. Private citizens with an interest in the Proposed Action are not included in this list to protect confidential contact information.

I. ELECTED AND APPOINTED GOVERNMENT OFFICIALS		
Honorable Chris Van Hollen US Senator for Maryland US Senate 110 Hart Senate Office Building Washington, DC 20510	Honorable Ben Cardin US Senator for Maryland US Senate 509 Hart Senate Office Building Washington, DC 20510	Honorable Steny Hoyer US Representative for Maryland's 5th District US House of Representatives 1704 Longworth House Office Building Washington, DC 20515
Senator Pat Roberts Senator for Kansas US Senate 109 Hart Senate Office Building Washington, DC 20510	Ms. Deborah Haynie Office of Senator Chris Van Hollen 110 Hart Senate Office Building Washington, DC 20510	Mr. Jim Notter Office of Representative Steny Hoyer 1705 Longworth House Office Building Washington, DC 20515
Ms. Betsy Bossart Office of Representative Steny Hoyer 1705 Longworth House Office Building Washington, DC 20515	Mr. Terrance Taylor Office of Representative Steny Hoyer 1705 Longworth House Office Building Washington, DC 20515	Ms. Alexis Covey-Brandt Office of Representative Steny Hoyer 1705 Longworth House Office Building Washington, DC 20515
Ms. Katie Grant Office of Representative Steny Hoyer 1705 Longworth House Office Building Washington, DC 20515	Ms. Jackie Cottrell Office of Senator Pat Roberts 109 Hart Senate Office Building Washington, DC 20510	Ms. Amber Kirchhoefer Office of Senator Pat Roberts 109 Hart Senate Office Building Washington, DC 20510
Ms. Ann Jacobs Senior Advisor House Transportation and Infrastructure Committee 2165 Rayburn House Office Building Washington, DC 20515	Ms. Ola Williams House Financial Services Committee 2129 Rayburn House Office Building Washington, DC 20515	Ms. Jennifer Read Senior Counsel House Financial Services Committee 2129 Rayburn House Office Building Washington, DC 20515
Mr. Kyle Simpson House Financial Services Committee 2129 Rayburn House Office Building Washington, DC 20515	Mr. Brad Beall Senate Banking Committee 534 Dirksen Senate Office Building Washington, DC 20515	Mr. James Guiliano Senate Banking Committee 534 Dirksen Senate Office Building Washington, DC 20515

Mr. Phil Rudd Senate Banking Committee 534 Dirksen Senate Office Building Washington, DC 20515	Mr. Andrew Newton Majority Staff Director Committee on Senate Appropriations The Capitol, Room S-128 Washington, DC 20515	Honorable Larry Hogan Governor of Maryland Office of the Governor 100 State Circle Annapolis, MD 21401
Honorable Jim Rosapepe Senator, District 21 Maryland Senate 11 Bladen Street, 101 James Senate Office Building Annapolis, MD 21401	Honorable Mary Lehman Delegate, District 21 Maryland House of Delegates 6 Bladen Street, 317 House Office Building Annapolis, MD 21401	Honorable Angela Alsobrooks County Executive Prince George's County Council 14741 Governor Oden Bowie Drive, 2nd Floor Upper Marlboro, MD 20772
Honorable Todd Turner County Council Chair Prince George's County Council 14741 Governor Oden Bowie Drive, 2nd Floor Upper Marlboro, MD 20772	Honorable Rodney Streeter County Council Vice Chair Prince George's County Council 14741 Governor Oden Bowie Drive, 2nd Floor Upper Marlboro, MD 20772	Honorable Mel Franklin County Council Member At Large Prince George's County Council 14741 Governor Oden Bowie Drive, 2nd Floor Upper Marlboro, MD 20772
Honorable Calvin Hawkins, II County Council Member At Large Prince George's County Council 14741 Governor Oden Bowie Drive, 2nd Floor Upper Marlboro, MD 20772	Honorable Thomas Dernoga District 1 Council Member Prince George's County Council 14741 Governor Oden Bowie Drive, 2nd Floor Upper Marlboro, MD 20772	Honorable Emmett Jordan Mayor Greenbelt City Council 25 Crescent Road Greenbelt, MD 20770
Ms. Judith Davis Mayor Pro Tem Greenbelt City Council 25 Crescent Road Greenbelt, MD 20770	Honorable Craig Moe Mayor City of Laurel 8103 Sandy Spring Road Laurel, MD 20707	Mr. William Goddard City Administrator City of Laurel 8103 Sandy Spring Road Laurel, MD 20707
Honorable Patrick Wojahn Mayor City of College Park 5015 Lackawanna Street College Park, MD 20740	Mr. Scott Somers City Manager City of College Park 4500 Knox Road College Park, MD 20740	

II. LOCAL and REGIONAL ADMINISTRATORS, FEDERAL AGENCIES, or COMMISSIONS

Mr. Rob Tomiak Director US Environmental Protection Agency, Office of Federal Activities 1200 Pennsylvania Avenue, NW Mail Code 2251A Washington, DC 20460	Ms. Barbara Rudnick NEPA Program Manager US Environmental Protection Agency, Region 3, Office of Environmental Programs 1650 Arch Street Philadelphia, PA 19103-2029	Mr. Terron Hillsman State Conservationist US Department of Agriculture, Natural Resources Conservation Service 339 Busch's Frontage Road, Suite 301 Annapolis, MD 21409

Ms. Stephanie Everfield Regional Environmental Officer Federal Emergency Management Agency, Environmental Planning & Historic Preservation 615 Chestnut Street, One Independence Mall, Sixth Floor Philadelphia, PA 19106-4404	Ms. Genevieve LaRouche Supervisor US Fish and Wildlife Service, Chesapeake Bay Field Office 177 Admiral Cochrane Drive Annapolis, MD 21401-7307	Mr. Carlton Hart Urban Planner National Capital Planning Commission 401 9th Street, NW, North Lobby, Suite 500 Washington, DC 20004
Mr. Matthew Flis Senior Urban Designer National Capital Planning Commission 401 9th Street, NW, North Lobby, Suite 500 Washington, DC 20004	Ms. Diane Sullivan Director, Urban Design and Plan Review Division National Capital Planning Commission 401 9th Street, NW, North Lobby, Suite 500 Washington, DC 20004	Mr. Lee Web Historic Preservation Specialist National Capital Planning Commission 401 9th Street, NW, North Lobby, Suite 500 Washington, DC 20004
Mr. Jack Van Dop Senior Program Manager Federal Highway Administration, Eastern Federal Lands Highway Division 21400 Ridgetop Circle Sterling, VA 20166	Mr. Jitesh Parikh Project Delivery / Environment Team Federal Highway Administration, Maryland Division 31 Hopkins Plaza, Suite 1520 Baltimore, MD 21201	Mr. Reid Nelson Director Advisory Council on Historic Preservation, Office of Federal Agency Programs 401 F Street NW, Suite 308 Washington, DC 20001
Mr. Scott Anderson Regional Administrator General Services Administration, National Capital Region 11 301 7th Street SW Washington, DC 20024	Ms. Heather Murphy Director Maryland Department of Transportation, Office of Planning and Capital Programming 7201 Corporate Center Drive Hanover, MD 21076	Mr. Ben Grumbles Secretary Maryland Department of the Environment 1800 Washington Boulevard Baltimore, MD 21230
Ms. Amanda Malcolm Stormwater Review Specialist Maryland Department of the Environment, Stormwater Management Program 1800 Washington Boulevard Baltimore, MD 21230	Ms. Denise Keehner Federal Consistency Coordinator Maryland Department of the Environment, Wetlands and Waterways Program 1800 Washington Boulevard Baltimore, MD 21230	Mr. David Heilmeier Southern Region Manager Maryland Department of Natural Resources, Wildlife Heritage Service 5625 Myrtle Grove Road La Plata, MD 20646
Mr. Jonathan McKnight Associate Director Maryland Department of Natural Resources, Wildlife Heritage Service, Natural Heritage Program 580 Taylor Avenue, Tawes State Office Building E1 Annapolis, MD 21401	Ms. Lori Byrne Environmental Review Specialist Maryland Department of Natural Resources, Wildlife Heritage Service 580 Taylor Avenue, Tawes State Office Building E1 Annapolis, MD 21401	Mr. Matt Fleming Director Maryland Department of Natural Resources, Chesapeake and Coastal Service 580 Taylor Avenue, Tawes State Office Building E1 Annapolis, MD 21401

Ms. Elizabeth Hughes Director/ State Historic Preservation Officer Maryland Historical Trust 100 Community Place, 3rd Floor Crownsville, MD 21032	Ms. Beth Cole Administrator, Project Review and Compliance Maryland Historical Trust, Office of Preservation Services 100 Community Place, 3rd Floor Crownsville, MD 21032	Mr. Colin Ingraham Chief Maryland Historical Trust, Office of Preservation Services 100 Community Place, 3rd Floor Crownsville, MD 21032
Ms. Helga Weschke Director, Federal Business Relations Maryland Department of Commerce, Office of Military and Federal Affairs 401 E. Pratt Street Baltimore, MD 21202	Mr. Chuck Bean Executive Director Metropolitan Washington Council of Governments 777 North Capitol Street, NE, Suite 300 Washington, DC 20002	Mr. Stephen Walz Director Metropolitan Washington Council of Governments, Department of Environmental Programs 777 North Capitol Street, NE, Suite 300 Washington, DC 20002
Mr. Anju Bennett Executive Director Maryland-National Capital Park and Planning Commission 6611 Kenilworth Avenue Riverdale, MD 20737	Ms. Crystal Saunders Hancock Acting Planning Supervisor Maryland-National Capital Park and Planning Commission 14741 Governor Oden Bowie Drive Upper Marlboro, MD 20772	Mr. David Lewis Director, Business Development Prince George's County Economic Development Corporation 1801 McCormick Drive, Suite 350 Largo, MD 20774
Mr. Howard Berger Supervisor Prince George's County, Historical Society 14741 Governor Oden Bowie Drive Upper Marlboro, MD 20772	Ms. Donna Schneider President Prince George's County, Historical Society PO Box 1513 Upper Marlboro, MD 20773	Mr. Jim Sterling Director of Public Works Greenbelt City Public Works 25 Crescent Road Greenbelt, MD 20771
Ms. Nicole Ard City Manager Greenbelt City 25 Crescent Road Greenbelt, MD 20770	Ms. Terri Hruby Director of Planning & Community Development Greenbelt City, Planning and Community Development 25 Crescent Road Greenbelt, MD 20770	
III. CITIZEN ADVISORY GROUPS and LOCAL INTEREST GROUPS OR PERSONS		
Ms. Cynthia Smith Greater Beltsville Business Association	Ms. Karen Coakley President Beltsville Citizens Association	Mr. John Peter Thompson Community Activist Greenbelt/Beltsville Area
Mr. Allan Stoner President Friends of Agricultural Research – Beltsville PO Box 1061 Beltsville, MD 20705	Mr. Jim Butcher Community Outreach Friends of Agricultural Research – Beltsville PO Box 1062 Beltsville, MD 20705	Mr. Dennis Doster Historic Sites Anacostia Trails Heritage Area, Inc. 4318 Gallatin Street, Maryland Milestones Heritage Center Hyattsville, MD 20781

Ms. Janet Gingold Chair Prince George's County Sierra Club [redacted]	Ms. Mary Cook President North College Park Community Association 4912 Nantucket Road College Park, MD 20740	Mr. Joseph Perry Director Greenbelt Homes, Inc. One Hamilton Place Greenbelt, MD 20770
Lore Rosenthal Program Chair Greenbelt Climate Action Network [redacted]	Mr. Frank Gervasi Beaverdam Creek Watershed Watch Group [redacted]	Mr. John "JD" Perkins Vansville Heights Citizen Association [redacted]
BARC Migratory Birds Community Organization [redacted]	Mr. Dan Smith Friends of Lower Beaverdam Creek [redacted]	
IV. NATIVE AMERICAN TRIBES		
Ms. Erin Thompson Director of Historic Preservation Delaware Nation, Oklahoma 31064 State Highway 281 Anadarko, OK 73005 [redacted]	Ms. Susan Bachor Preservation Representative Delaware Tribe of Indians PO Box 64 Pocono Lake, PA 18347 [redacted]	Mr. Jesse Bergevin Historic Resources Specialist Oneida Indian Nation 2037 Dream Catcher Plaza Oneida, NY 13421
Mr. Sid Hill Onondaga Nation Dyohdihwasne'ha Administration Building 4040 Route 11 Nedrow, NY 13120	Mr. William Tarrant Cultural Director Seneca-Cayuga Nation PO Box 453220 Grove, OK 74344	Mr. Arnold Printup, Jr. Tribal Historic Preservation Officer Saint Regis Mohawk Tribe Ionkwakiohkwaroron Tribal Administrative Building, Room 123 71 Margaret Terrance Memorial Way Akwesasne, NY 13655
Mr. Bryan Printup Tuscaora Environment Office Tuscarora Nation of New York 5226 Walmore Road Lewiston, NY 14092		
V. LOCAL LIBRARIES		
Prince George's County Memorial Library System Beltsville Branch Library 4319 Sellman Road Beltsville, MD 20705	Prince George's County Memorial Library System Greenbelt Branch Library 11 Crescent Road Greenbelt, MD 20770	College Park Community Library 9704 Rhode Island Avenue College Park, MD 20740

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