

US Department of the Treasury Environmental Impact Statement Final

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US Army Corps
of Engineers®



Abstract Page

Lead Agency:	US Department of the Treasury
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Abstract: The United States (US) Department of the Treasury (Treasury) proposes to construct and operate a new Currency Production Facility within the National Capital Region (Proposed Action) to replace the Bureau of Engraving and Printing's (BEP's) existing production facility located in downtown Washington, DC. 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 at the Henry A. Wallace Beltsville Agricultural Research Center 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 Final 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; 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 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 Final 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 Final 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 EIS is accompanied by a supplemental technical memorandum for each analyzed resource area that provides additional detail on the existing conditions and Treasury's impact analysis for the respective resource area. These written documents (i.e., the EIS and related technical memoranda) are further supplemented 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) within the National Capital Region (NCR) (Proposed Action) 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, including the DC Facility. 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, 2017a)
- [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. Renovation of the existing DC Facility would be a major undertaking, requiring the facility to be completely gutted and rebuilt (i.e., to the extent possible given the facility's historic designation) to accommodate modern currency production equipment and processes. Further, this major renovation would need to be conducted while the facility remained operational.

Renovation of the DC Facility would be substantially more expensive, with a substantially longer implementation schedule, than building a new replacement CPF. Once complete, a renovated DC Facility would still face inefficiency, employee safety, and security concerns (see **Section ES.4**) that any renovation would not be able to address.

Based on its studies, 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 CPF within the NCR to replace Treasury's insufficient DC Facility.

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 be located on a property that enables Treasury to comply with required [federal facility security standards](#) (ISC, 2016).

Over the long-term, the Proposed Action would likely enable Treasury to reduce its 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 discontinuing use of two of its three existing facilities in the NCR.

The **need** for the Proposed Action is that Treasury's existing DC Facility is neither able to support modern currency production nor able to support Treasury's current and future mission. Its configuration is inefficient and poses safety risks to staff, and its location prevents Treasury from complying with required federal facility security standards. The condition, configuration, and location of the DC Facility severely limit Treasury's ability to modernize the DC Facility through renovation (GAO, 2018).

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 approximately 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 estimated 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 or 2022. 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 also would incorporate a public educational experience into the new facility. The proposed CPF would include an exhibition/museum area as well as a visitor center/gift shop. The public would also be able to take a tour of portions of the proposed CPF to see the currency production process. The exhibition/museum area and tour would educate the public about the BEP and its history, the history of the CPF site, current and historical US currency production, and the unique sustainable features of the CPF. Public visitation would be limited to a maximum of 30 parties at one time and would require advance registration and ticketing.

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 in the NCR. Treasury would continue to operate under current conditions to the extent possible, in accordance with all applicable laws, regulations, and permits, 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.

The USDA would continue to own Treasury's proposed parcel at BARC and be responsible for managing all extant buildings on-site, although none of the buildings would be utilized for USDA operations. Under the USDA's continued ownership, the USDA would remain responsible for complying with all applicable federal and state regulations. Accordingly, the USDA would be required to prevent or mitigate adverse effects to the BARC Historic District, to ensure the continued structural integrity and security of existing buildings, and to contain or remediate existing hazardous materials and wastes such that there is no potential for significant adverse impacts to the health and safety of BARC employees or other personnel.

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, available 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; 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 Areas¹

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.	<i>Construction:</i> Less-than-significant adverse impact on surrounding land uses from construction activities. <i>Operation:</i> 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.	<i>Construction:</i> 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. <i>Operation:</i> Less-than-significant adverse impacts to views from roadways; significant adverse impacts to views from residences along Odell Road; negligible adverse impacts along Powder Mill Road from a new traffic control device; significant adverse impacts on nighttime lighting levels for residences along Odell Road.
Air Quality	No impact on air quality.	<i>Construction:</i> Less-than-significant adverse impacts from criteria pollutant, fugitive dust, and greenhouse gas (GHG) emissions; negligible adverse impacts from hazardous air pollutant (HAP) emissions. <i>Operation:</i> 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.	<i>Construction:</i> Less-than-significant adverse impacts on noise-sensitive receptors from construction activities. <i>Operation:</i> 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 armored truck traffic traveling through BARC; beneficial impacts to noise-sensitive receptors from the removal of rumble strips on Powder Mill Road.
Topography and Soils	No impact to topography. Less-than-significant adverse impact to soils from the release of contaminants due to building deterioration.	<i>Construction:</i> No or negligible adverse impact to soils from vegetation removal and compaction; no impact to topography. <i>Operation:</i> No or negligible adverse impact from stormwater runoff; no significant impact to designated farmland soils; no impact to topography.
Water Resources	No impact on water resources.	<i>Construction:</i> 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
		<p>from excavation and potential contaminant mobilization; no adverse impact to the coastal zone.</p> <p><i>Operation:</i> 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.</p>
<p>Biological Resources</p>	<p>No impact on biological resources.</p>	<p><i>Construction:</i> Less-than-significant adverse impact on forest resources and vegetation from the conversion of vegetated land to developed land; no impact on invasive species; 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 bald eagles and migratory birds.</p> <p><i>Operation:</i> 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; negligible impact on bald eagles and migratory birds from an increase in ambient noise and light levels; less-than-significant adverse impact on migratory birds from the potential for window strikes.</p>
<p>Cultural Resources</p>	<p>No impact on archaeological or paleontological resources. Less-than-significant adverse impact on the BARC Historic District and its contributing resources due to building neglect and deterioration.</p>	<p><i>Construction:</i> No impact to one potential National Register of Historic Places-eligible archaeological site; no impacts on paleontological resources; less-than-significant adverse impacts on previously unknown archaeological or paleontological sites if discovered during construction; less-than-significant adverse impact from the demolition of 22 contributing resources to the BARC Historic District.</p> <p><i>Operation:</i> 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.</p>
<p>Traffic and Transportation</p>	<p>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</p>	<p><i>Construction:</i> 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.</p> <p><i>Operation:</i> Less-than-significant adverse impact on roadways in the regional ROI; less-than-significant adverse impact to local traffic during congested periods; less-than-significant adverse impact on public safety from potential cut-through traffic; 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 impacts to intersections due to longer delays; significant adverse impacts to six intersections from a failing LOS; less-than-significant</p>

Resource Area	No Action Alternative	Preferred Alternative
	<p>(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.</p>	<p>adverse impacts to intersections due to longer queue lengths; significant adverse impacts to one intersection from failing queue lengths; no impact to parking; less-than-significant adverse impact to the pedestrian and bicycle network; negligible adverse impacts to public transit and transit revenue from shifts in ridership.</p>
<p>Utilities</p>	<p>No impact on utilities.</p>	<p><u>Construction:</u> 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. <u>Operation:</u> Negligible adverse impacts on utility demand and availability from increased usage.</p>
<p>Socioeconomics and Environmental Justice</p>	<p>No impact to the socioeconomic environment or EJ communities.</p>	<p><u>Construction:</u> 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. <u>Operation:</u> 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.</p>
<p>Hazardous and Toxic Materials and Waste</p>	<p>Less-than-significant adverse impact from existing buildings falling into disrepair.</p>	<p><u>Construction:</u> Less-than-significant adverse impact from accidental release of HTMW; beneficial impact from removal and off-site disposal of regulated building materials. <u>Operation:</u> 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.</p>
<p>Human Health and Safety</p>	<p>Less-than-significant adverse impact to Treasury staff from the continued use of the DC Facility and the inability to address safety and security risks. Less-than-significant adverse impact to BARC staff from the continued presence of HTMW and unsafe buildings on BARC.</p>	<p><u>Construction:</u> 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. <u>Operation:</u> 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.</p>

1. In the “No Action Alternative” and “Preferred Alternative” columns, **bold typeface** identifies potential 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, RCMs, and BMPs, 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, petition Prince George’s County for a zoning reclassification of Treasury’s proposed parcel from “Residential: to “Industrial.”
- As described under Visual Resources, establish landscape buffers, including appropriate-height vegetation, on all sides of Treasury’s proposed parcel to minimize views from off-site areas, to the extent practicable while still meeting site security requirements.

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. Fencing material and design character should be open to the extent permitted by security criteria with the understanding that the perimeter fencing should not appear visually defensive.
- Establish landscape buffers, including appropriate-height vegetation, on all sides of Treasury’s proposed parcel to minimize views from off-site areas, to the extent practicable while still meeting site security requirements. The natural topography obscures the views of the new building from the adjacent public roads.
- 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.

Noise

- As described under Visual Resources, establish landscape buffers, including appropriate-height vegetation, on all sides of Treasury’s proposed parcel to further reduce off-site noise impacts while still meeting site security requirements.

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, with the exception of the crossing of the south security fence.

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

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).
- As described under Visual Resources, establish landscape buffers, including appropriate-height vegetation, on all sides of Treasury's proposed parcel to minimize views from off-site areas, to the extent practicable while still meeting site security requirements. This mitigation measure would further reduce potential adverse impacts to the bald eagle nest located approximately 0.6 mile south of the Project Site.
- Construct and maintain the proposed stormwater management features to provide as much wildlife habitat value as possible.
- Develop the landscape plan to revegetate Treasury's proposed parcel with native vegetation and micro-habitats (e.g., maintained meadows and additional reforestation) such that it maximizes wildlife values.

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. Please see also the mitigation measures identified under Visual Resources.

Traffic and Transportation:

- Propose, consult with public stakeholders, and ultimately design and implement mitigation measures for six intersections as detailed in the [Transportation Impact Study](#). Ultimate implementation would be contingent upon receiving approval from appropriate stakeholders.
- Propose, consult with public stakeholders, and ultimately implement mitigation measures for Intersection 7 as detailed in the [Transportation Impact Study](#) to minimize safety hazards at this intersection caused by gap acceptance issues. Ultimate implementation would be contingent upon receiving approval from appropriate stakeholders.
- In consultation with local planning authorities, implement traffic-calming devices (e.g., speed bumps) and/or reduce speed limits 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 on-site pedestrian and/or 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 to serve the proposed CPF more effectively, and, if applicable, to install bus stop shelters, 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.

Socioeconomics and Environmental Justice

- Issue quarterly (i.e., every three months) informative newsletters containing updates regarding the Proposed Action to residents of Vansville within the Proposed Action's EJ ROI. Treasury may tailor the distribution lists based on which EJ communities may be impacted by different components of the Proposed Action. Publish the newsletter online, issue via email distribution, and regular mail to interested residents of the listed EJ communities, as necessary to ensure availability. The newsletter should contain Government point-of-contact information for interested residents to contact Treasury with questions or concerns regarding the Proposed Action.

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 were initially most concerned, in order of importance, about: traffic and transportation, land use, water resources, biological resources, Alternatives Considered/Proposed Action/Purpose and Need, HTMW, 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 were summarized and addressed within each resource area discussion in the Draft EIS (DEIS).

Based on comments received on the DEIS, stakeholders are most concerned about water resources (particularly wastewater treatment and green infrastructure), biological resources (particularly migratory birds and bald eagles), traffic and transportation, the alternatives screening process, environmental impact reduction, and land use. Treasury updated this Final EIS (FEIS) in response to comments on the DEIS. Please refer to **Section ES.11** for further information.

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 (USACE), Baltimore District 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 made the 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 concluded 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. Due to the ongoing COVID-19 pandemic and associated restrictions, the public meeting for the DEIS was held online on December 2, 2020. Call-in information for this Virtual Public Meeting was provided in the NOA notifications. Public outreach materials and the full text of the DEIS were published online for the entire 45-day comment period at <https://bep-eis.consultation.ai/> and on the [project website](#). Members of the public were able to request hard copies of any materials by contacting USACE – Baltimore District via the methods listed in the outreach materials and on the Abstract Page of the DEIS.

In total, Treasury received 506 distinct public comments. All public comments received on the DEIS, as well as Treasury’s responses, are included in **Section 9.0** of this FEIS. Treasury updated this FEIS in response to comments on the DEIS as identified in **Section 9.0**.

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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
AST	Aboveground Storage Tank
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
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
CZMP	Coastal Zone Management Program
dBA	A-weighted decibel
DC Facility	Washington, DC production facility
DEIS	Draft Environmental Impact Statement
DoD	Department of Defense
DOE	Determination of Eligibility
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
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
HAZWOPER	Hazardous Waste Operations and Emergency Response
HID	High-Intensity Discharge
HTMW	Hazardous and Toxic Materials and Waste
HVAC	Heating, Ventilation, and Cooling
I	Interstate
IDA	International Dark-Sky Association
IPaC	Information for Planning and Consultation
ISC	Interagency Security Committee
LED	Light-Emitting Diode
LEED	Leadership in Energy and Environmental Design
LOD	Limits of Disturbance
LOS	Level of Service
MCL	Maximum Contaminant Level
MCPP	Mecoprop
MD	Maryland (State Route)
MDE	Maryland Department of the Environment
MDNR	Maryland Department of Natural Resources
MDOT	Maryland Department of Transportation
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 Discharge Elimination System
NPS	National Park Service
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
O ₃	Ozone
OEHS	Office of Environment, Health, and Safety
OMB	Office of Management and Budget
OSH	Occupational Safety and Health
OSHA	Occupational Safety and Health Administration
PA	Programmatic Agreement
Pb	Lead
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
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Condition
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
SPCCP	Spill Prevention, Control, and Countermeasures Plan
SWPPP	Stormwater Pollution Prevention Plan
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 and Heritage Service
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) within the National Capital Region (NCR) (Proposed Action) 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 EIS is accompanied by a supplemental technical memorandum for each analyzed resource area that provides additional detail on the existing conditions and Treasury's impact analysis for the respective resource area. These written documents (i.e., the EIS and related technical memoranda) are further supplemented by a "Digital EIS," or digital display of relevant data which can be found on the [project website](#). Combined, these data presentations clearly convey relevant and required information to inform the public and decision-makers.

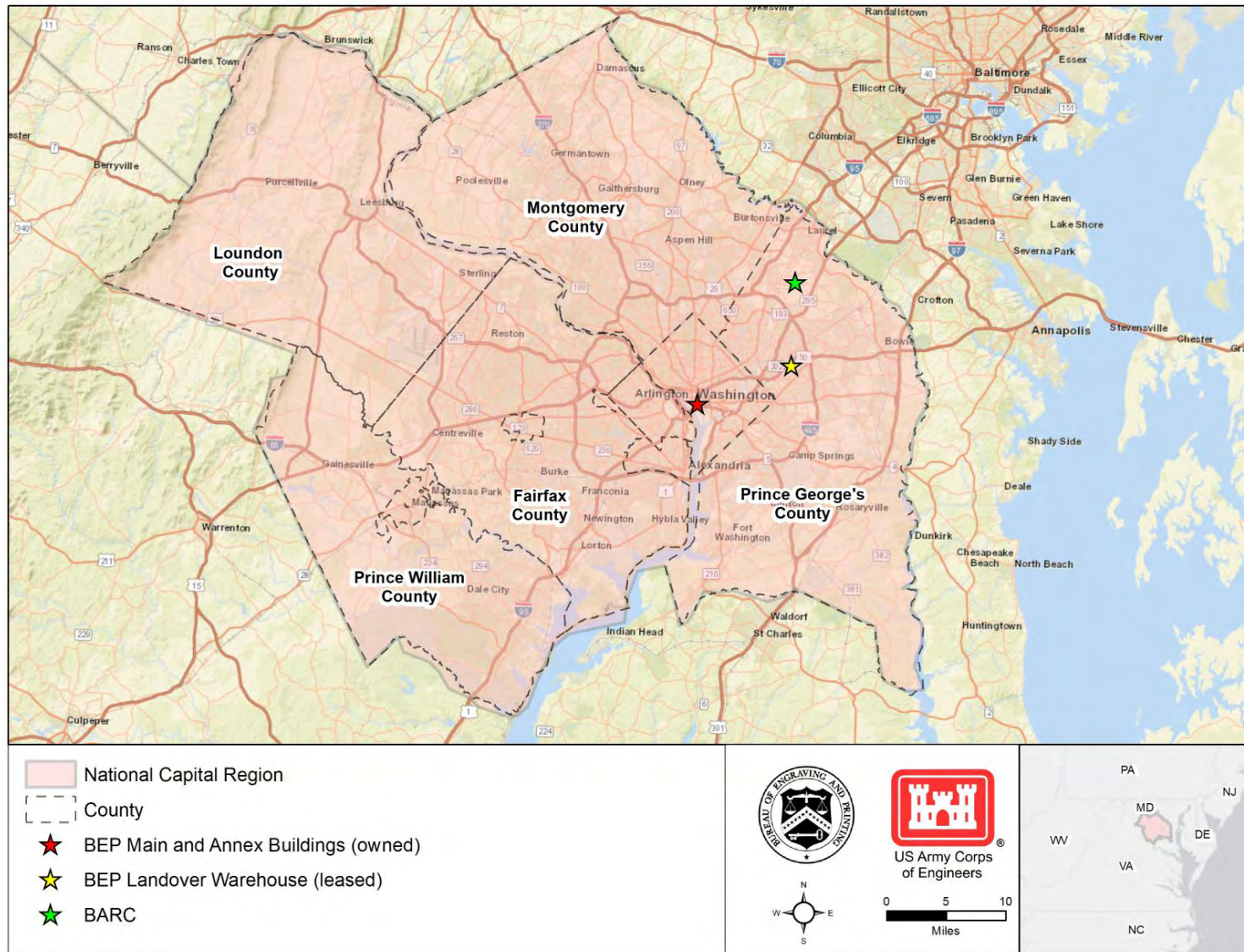


Figure 1.2-1: Regional Location Map

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, all resource-specific technical memoranda and appendix material have 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 contains additional office space, materials storage, and other functions necessary to support the Main Building of the DC Facility. The DC Facility is also supported by a BEP-leased warehouse in Landover, Maryland that stores additional materials and receives large commercial truck shipments that the DC Facility cannot accommodate on-site. These NCR facilities (see **Figure 1.2-1**), 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, including the DC Facility. 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, 2017a)
- [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. Renovation of the existing DC Facility would be a major undertaking, requiring the facility to be completely gutted and rebuilt (i.e., to the extent possible given the facility's historic designation) to accommodate modern currency production equipment and processes. Further, this major renovation would need to be conducted while the facility remained operational.

Renovation of the DC Facility would be substantially more expensive, with a substantially longer implementation schedule, than building a new replacement CPF. Once complete, a renovated DC Facility would still face inefficiency, employee safety, and security concerns (see **Section 1.4**) that any renovation would not be able to address.

Based on its studies, 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 CPF within the NCR to replace Treasury's insufficient DC Facility.

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 be located on a property that enables Treasury to comply with required [federal facility security standards](#) (ISC, 2016).

Over the long term, the Proposed Action would likely enable Treasury to reduce its 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 discontinuing use of two of its three existing facilities in the NCR (i.e., the Annex Building and Landover warehouse). Future plans for these two existing Treasury facilities, however, have not yet been developed (see **Section 2.2.3**).

The Proposed Action would replace the operationally deficient DC facilities with a cumulatively smaller, strategically located, state-of-the-art CPF within the NCR. Importantly, Treasury's production operations would be co-located on a single floor in an appropriately sized, reconfigurable workspace with flexibility to optimize workflow efficiency and scale production up or down in response to economic conditions or technological changes (e.g., as production equipment evolves). Treasury determined that a new CPF of approximately 1 million square feet would be required to replace currency production at the DC Facility and modernize its operations (BEP, 2017b).

The **need** for the Proposed Action is that Treasury's existing DC Facility is neither able to support modern currency production nor able to 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 inflexible. Because of this configuration, during the production process, each currency note at the DC Facility travels more than twice the distance of notes produced at the WCF. The DC Facility also has a higher cost of production per currency note and employs more manufacturing staff, despite producing fewer currency notes overall, than the WCF (GAO, 2018). Fragmented materials storage across multiple facilities further exacerbates these inefficient production workflows; the DC Facility has limited space and cannot accommodate larger commercial truck shipments, thus requiring Treasury to lease the warehouse in Landover, Maryland to receive and store these materials, and then ship the materials in smaller quantities and vehicles to the DC Facility.

The DC Facility's configuration also poses safety risks to staff. The DC Facility hosts approximately 52 percent of the BEP's manufacturing staff, yet approximately 67 percent of the BEP's workers' compensation claims originate at this facility. The majority of worker injuries are related to materials handling which, as noted above, is substantially greater at the DC Facility relative to the WCF (GAO, 2018).

Further, the location of the DC Facility (i.e., in an urban center, surrounded by buildings, and adjacent to public rights-of-way) prevents Treasury from complying with current physical security standards (e.g., security setback distances and a secure perimeter) in accordance with [Interagency Security Committee \(ISC\) standards](#) (ISC, 2016). The DC Facility's historic designation also limits the extent to which Treasury could alter the building's structure to mitigate security concerns. Together, these factors place the DC Facility at relatively high risk of external threats.

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 FEIS.

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; 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 (USACE), Baltimore District 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 \(FSD\)](#)
- [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, provided Tribes with the Draft Phase I Archaeological Surveys in January 2020 and September 2020, and provided Tribes with the Draft Phase II Archaeological Evaluation and overall determination of effect for the Proposed Action on historic properties in October 2020.

The Delaware Nation, Oklahoma responded on November 8, 2019 with a recommendation to conduct a cultural resources survey for the proposed undertaking. On December 2, 2020, the Delaware Nation, Oklahoma concurred with the effect determination for the Proposed Action and declined to participate in the Section 106 Memorandum of Agreement (MOA) consultation.

The Oneida Nation of New York responded on September 28, 2020 with a statement of no concern or comment, and followed up on November 24, 2020 that the Oneida Nation of New York does not wish to be a Section 106 consulting party.

The Delaware Tribe of Indians responded on October 28, 2020 with a statement that its office has recently reopened, and is in the process of prioritizing its projects.

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 the [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 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 EIS.

1.10.3 Draft EIS Public Review Process

Treasury made the 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 concluded 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 in which 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.

Due to the ongoing COVID-19 pandemic and associated restrictions of public gatherings, the Public Meeting for the DEIS was held online on December 2, 2020. Call-in information for this Virtual Public Meeting was provided in the NOA notifications. Public outreach materials and the full text of the DEIS were published online for the entire 45-day comment period at <https://bep-eis.consultation.ai/> and on the [project website](#). Members of the public were able to request hard copies of any materials by contacting USACE – Baltimore District via the methods listed in the outreach materials and on the Abstract Page of the DEIS.

Treasury received 506 distinct comments during the public comment period. All public comments received on the DEIS are provided on the [project website](#). Treasury's responses to public comments, including discussion of associated revisions made in this FEIS, as appropriate, are included in **Section 9.0**. Overall, stakeholders are most concerned about water resources (particularly wastewater treatment and green infrastructure), biological resources (particularly migratory birds and bald eagles), traffic and transportation, the alternatives screening process, environmental impact reduction, and land use. Please refer to **Section 9.0** for further information.

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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 approximately 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 estimated 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 July 2021). This sequence is discussed further in the subsections that follow and includes the following primary phases and estimated timeframes:

1. Complete the 100 percent design to meet operational, security, and safety standards, and obtain required regulatory permits (2021-2022).
2. Construct the facility (2021-2025).
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 Design¹

Early in the conceptual design phase for this Proposed Action, Treasury developed a series of process-guiding principles, summarized as follows:

1. **Security:** Enhance the quality and effectiveness of security on campus and within the proposed facility. Provide best-in-class protection for staff, visitors, and currency production.
2. **Operational Efficiency:** Construct a high-performing and automated manufacturing facility that tracks the supply chain of materials and products, reduces work in progress (i.e., improves efficiency), and utilizes building systems that are easily maintainable. Look globally at the BEP's production and beyond to shape the most efficient and cost-effective currency manufacturer worldwide.

¹ If Treasury selects the Preferred Alternative for implementation in the ROD, interested stakeholders would be able to follow the design process through Treasury's public design submittals to the National Capital Planning Commission (NCPC). The NCPC's main website is <https://www.ncpc.gov/> while public comment notices seeking comments on NCPC's upcoming project reviews are posted at <https://www.ncpc.gov/participate/notices/>.

Treasury submitted its preliminary design, including the updated site plan, to the NCPC for the April 2021 Commission meeting, and would submit subsequent design submittals to the NCPC in approximately early fall 2021 (for Concept submission) and spring 2022 (for final approval). The progressed design, as well as answers to questions raised by NCPC staff and commissioners, would be addressed in subsequent meetings following the final submission. The design submissions would also be updated as needed to include any mitigation measures Treasury may adopt for this Proposed Action in the ROD. Should supplemental NEPA analysis be required for any components of this Proposed Action (e.g., off-site utility work or mitigation measures; see **Section 2.4.2**), Treasury would likely initiate this process in late summer or fall 2021.

3. **Sustainability & Environment**: Respect the existing character of the site by minimizing site disturbances, reducing production waste streams, and maximizing green space. Generate sustainable campus-wide strategies to promote energy efficiency while balancing costs.
4. **Future-proofing & Flexibility**: Fabricate a state-of-the-art facility for currency production capable of accommodating rapid changes in printing technologies, processes, security threats, and shifts in future workplace.
5. **Health, Wellness, & Safety**: Design a campus that meets production needs while enhancing workplace safety and quality of life for employees. Create a sense of community that embraces the existing property and attracts workforce talent for decades to come.
6. **Institutional Identity**: Build a discreet but distinctive facility that echoes the stature, security, and innovation of the US bank note. Utilize the site to create a destination that invites visitors to learn about the production and history of US money. Design the building and site to blend in and communicate environmental sustainability to neighbors, visitors, and staff.
7. **Technology & Process Innovation**: Provide innovative solutions to accommodate evolving technology, reduce counterfeiting threats, and protect the environment.
8. **Budget Compliance**: Ensure lasting value of the project by tracking and calibrating design decisions through every phase.
9. **Timeliness & Schedule**: Establish rapid delivery of intelligent design that is on time in every phase.
10. **Workforce/Workplace**: Promote the BEP as a workplace of choice with shared core functions, collaboration spaces, and conferencing areas. Provide workplace and support spaces with daylight and access to nature to attract the current and next generation workforce.

The new CPF would be approximately 1 million square feet and 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, warehouse, and public visitation space constructed in accordance with the Department of Defense (DoD) 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.

Treasury also would incorporate a public educational experience into the new facility. The proposed CPF would include an exhibition/museum area as well as a visitor center/gift shop. The public would also be able to take a tour of portions of the proposed CPF to see the currency production process. The exhibition/museum area and tour would educate the public about the BEP and its history, the history of the CPF site, current and historical US currency production, and the unique sustainable features of the CPF. Public visitation would be limited to a maximum of 30 parties at one time and would require advance registration and ticketing. Public visitation would occur during the middle of the workday (e.g., 9:00 a.m. to 3:00 p.m. ET) to generally avoid added traffic congestion during both the peak hours of local roadways and primary commuting hours of Treasury personnel (see **Section 3.10**).

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 ISC Level IV federal facility security requirements, including site setbacks for security structures, vehicle inspection areas, parking areas, maintenance and storage sheds, and fencing. The security fence would be “anti-climb” and see-through, and could be supplemented with adjacent plantings. Field-of-view and lighting security requirements would be met; in consideration of nearby land uses, Treasury would design the Proposed Action to minimize potential light spillover off-site.

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
- Non-potable greywater 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.

Treasury also would incorporate various green infrastructure/low impact development (GI/LID) features into the Proposed Action to manage stormwater and increase site sustainability. Currently within the preliminary design phase, Treasury is considering the following GI/LID features:

- Rainwater harvesting
- Green roofs
- Permeable pavers for the parking lot
- Reinforced turf/grass paving where practicable (e.g., fire lanes)
- Micro-bioretenion features along impervious surfaces (e.g., parking lots and roadways)
- Bioswales and/or grass swales along roadways
- Submerged gravel wetlands

These features would reduce the amount of impervious surfaces installed on-site and retain stormwater, reducing and slowing site runoff and filtering potential pollutants (e.g., sediments or oils from the parking lot).

Stormwater management and site drainage would be designed based on detailed hydrological analysis of the Project Site, such that peak storm flow rates for the 10-year and/or 100-year post-development storms, as applicable, would match pre-development conditions for stormwater flowing off-site. Treasury is designing the on-site stormwater management strategy and features to comply with the [Maryland Stormwater Management and Erosion & Sediment Control Guidelines for State and Federal Projects](#). Per Section 438 of the Energy Independence and Security Act (EISA), stormwater retention treatment would be designed for the 95th percentile rainfall event.

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**.

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

Resource Area	Construction	Operation
<p>Land Use</p>	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • Maintain professionally landscaped grounds around the proposed CPF and the forested border between the facility and Odell Road during operation.
<p>Visual Resources</p>	<ul style="list-style-type: none"> • Install privacy fencing along Odell Road and the proposed entrance road during construction to further minimize views of construction activities. 	<ul style="list-style-type: none"> • Design the proposed CPF in a manner consistent with Treasury’s project-specific 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). • Design the proposed CPF in consideration of the International Dark-Sky Association’s (IDA) five principles for responsible outdoor lighting. • 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
<p style="text-align: center;">Air Quality</p>	<ul style="list-style-type: none"> • Comply with the Maryland Department of the Environment’s (MDE) 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 (SO₂) 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. • Spray water on any stockpiles or unpaved areas to minimize fugitive dust emissions, as appropriate. Ensure water application does not increase erosion or result in increased down-gradient sedimentation of waterways. • 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. 	<ul style="list-style-type: none"> • 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.
<p style="text-align: center;">Noise</p>	<ul style="list-style-type: none"> • 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. • Coordinate with the USDA regarding the anticipated noise levels for the Henry A. Wallace Beltsville Agricultural Research Center (BARC) facilities throughout the construction phase to ensure noise impacts to on-site staff are maintained at acceptable Occupational Safety and Health Administration (OSHA) levels. 	<ul style="list-style-type: none"> • Minimize noise to off-site, non-federal noise-sensitive receptors by restricting 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. • Limit large truck (i.e., tractor trailer) deliveries to daytime hours; ensure armored trucks used for nighttime currency shipments are loaded within the proposed CPF to minimize or avoid exterior noise at night. • 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;

Resource Area	Construction	Operation
	<ul style="list-style-type: none"> Require construction workers to wear appropriate protective gear during loud activities in accordance with OSHA safety requirements to prevent hearing damage or other adverse impacts. Require construction-related heavy trucks to access the Project Site through BARC to minimize impacts to off-site, non-federal noise-sensitive receptors. 	<p>operate such equipment in accordance with the Prince George’s County Noise Ordinance.</p> <ul style="list-style-type: none"> Fully enclose currency production equipment within the proposed CPF in a manner that reduces or avoids exterior noise. Design the proposed CPF to include a noise abatement strategy (e.g., use of baffles, absorbing materials, and vibration control) to reduce operational interior noise from currency production such that compliance with OSHA standards is achieved for on-site workers. Implement an OSHA-compliant hearing conservation program if interior noise levels exceed regulatory standards.
<p>Topography and Soils</p>	<ul style="list-style-type: none"> Obtain a <i>Maryland General Permit for Stormwater Associated with Construction Activity</i> 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 GI/LID techniques into the Proposed Action that would minimize impervious surfaces and 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). 	<ul style="list-style-type: none"> 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.
<p>Water Resources</p>	<ul style="list-style-type: none"> 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 using a natural stream system. Obtain and adhere to appropriate permits (or letters of exemption) from the MDE and USACE to comply with Sections 	<ul style="list-style-type: none"> Obtain and adhere to the requirements of a <i>Maryland General Permit for Discharges of Stormwater Associated with Industrial Activity</i> 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

Resource Area	Construction	Operation
	<p>404/401 of the CWA and comply with all BMPs established throughout this consultation process.</p> <ul style="list-style-type: none"> • Obtain a <i>Maryland General Permit for Stormwater Associated with Construction Activity</i> 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). • Comply with Maryland Tier II Antidegradation Review policies. • Consider all Maryland Stormwater Management Controls, Environmental Site Design, and “Green Building” Alternatives, as described by MDE, during design of the proposed CPF. • Comply with Maryland’s Erosion and Sediment Control Regulations, Stormwater Management Regulations, the Maryland Stormwater Management and Erosion & Sediment Control Guidelines for State and Federal Projects, and associated technical memoranda. • Incorporate, as required by Section 438 of the EISA, GI/LID measures to maintain the pre-development hydrology of the Project Site to the maximum extent technically feasible during operation, minimizing any change in the rate, volume, and temperature of stormwater discharging to off-site areas. • Incorporate, as required by EO 13508, stormwater control BMPs to manage and reduce pollution flowing from the Project Site into the Chesapeake Bay and its tributaries. • Submit a Federal Consistency Determination (FCD) to the Maryland Department of Natural Resources (MDNR) for review and concurrence. • Demarcate the construction LOD in the field to prevent encroachment on unpermitted surface water resources. • Establish construction staging areas at least 100 feet away from surface water resources. 	<p>General Permit that currently covers BARC operations to include the proposed CPF.</p> <ul style="list-style-type: none"> • Comply with wastewater quality standards established in agreement with the USDA.

Resource Area	Construction	Operation
	<ul style="list-style-type: none"> 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. 	
<p>Biological Resources</p>	<ul style="list-style-type: none"> Implement pre-construction activities, such as pruning and/or fertilizing, as specified in the Forest Conservation Plan (FCP) to ensure retained specimen tree health. Incorporate the tree canopy and tree replacement policies from the NCPC Comprehensive Plan Federal Environment Element into the design of the Preferred Alternative to the maximum extent practicable. Consider the wildlife design guidelines outlined in Section H of the NCPC Comprehensive Plan Federal Environment Element in the design of the Preferred Alternative to the maximum extent practicable. Implement the following bald eagle disturbance avoidance measures: <ul style="list-style-type: none"> Maintain a distance buffer of at least 660 feet between all project activities and the existing BARC eagle nest. If there is an existing human-made feature (e.g., house, road, structure) similar to the Proposed Action that is closer than 660 feet and tolerated by the nesting eagles, maintain a distance buffer equal to or greater than the distance separating that tolerated feature and the nest. Do not perform disruptive project activities within 660 feet of the nest during the breeding season (December 15 to June 30). Disruptive activities include, but are not limited to, external construction, excavation, use of heavy equipment, use of loud equipment or machinery, vegetation clearing, earth disturbance, planting, and landscaping. 	<ul style="list-style-type: none"> 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. Use only native species in landscaping and revegetation techniques to prevent the introduction and proliferation of invasive species. Incorporate into the design of the proposed CPF the EPMs/RCMs/BMPs described for Visual Resources and Noise to abate or shield light and noise, respectively. 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.

Resource Area	Construction	Operation
	<ul style="list-style-type: none"> Maintain existing landscape buffers that visually screen the activity from the nest. Limit or avoid site clearance activities (e.g., tree removal, building demolition) within the migratory bird nesting season (i.e., approximately 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. 	
<p>Cultural Resources</p>	<ul style="list-style-type: none"> 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, including paleontological resources (e.g., dinosaur bones), 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 <i>Professional Qualification Standards</i> (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. 	<ul style="list-style-type: none"> None.

Resource Area	Construction	Operation
<p>Traffic and Transportation</p>	<ul style="list-style-type: none"> To the extent possible, 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.). 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. 	<ul style="list-style-type: none"> Develop a Transportation Management Plan to include an annual review of the commuting methods of CPF personnel and provisions to encourage alternate modes of transport. 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.
<p>Utilities</p>	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> 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 BMPs in accordance with EO 13508 to minimize the strain on stormwater infrastructure.

Resource Area	Construction	Operation
<p>Socioeconomics and Environmental Justice</p>	<ul style="list-style-type: none"> Implement the impact-reduction measures described for Air Quality, Noise, Visual Resources, and Traffic and Transportation. 	<ul style="list-style-type: none"> Implement the impact-reduction measures described for Air Quality, Noise, Visual Resources, and Traffic and Transportation.
<p>Hazardous and Toxic Materials and Waste</p>	<p><i>Pre-Construction</i></p> <ul style="list-style-type: none"> 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 Maryland Department of Transportation (MDOT) regulations. Consult with MDE’s Resource Management Program to ensure proper management of HTMW during construction of the Proposed Action. <p><i>Construction</i></p> <ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> Consult with MDE’s Resource Management Program to ensure proper management of HTMW during operation of the Proposed Action. Develop and implement a Spill Prevention, Control, and Countermeasures Plan (SPCCP); Emergency Response Plan that complies with OSHA Hazardous Waste Operations and Emergency Response (HAZWOPER) and USEPA Resource Conservation and Recovery Act (RCRA) regulations; and a site-specific Stormwater Pollution Prevention Plan (SWPPP). 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 Environmental Management System Business Policy.

Resource Area	Construction	Operation
<p>Human Health and Safety</p>	<ul style="list-style-type: none"> • 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. • Perform all construction activities in accordance with applicable OSHA requirements and federal and state Occupational Safety and Health (OSH) regulations. • Prepare and adhere to a site-specific medical emergency response 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 site-specific health and safety procedures. These procedures 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. 	<ul style="list-style-type: none"> • Prepare and adhere to a site-specific medical emergency response 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 site-specific health and safety procedures. These procedures 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. • Conduct administrative and production activities in accordance with applicable OSHA requirements and federal and state OSH regulations. • Continue to review and assess potential security threats and adjust security measures accordingly.
<p>Cumulative Effects</p>	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • 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.

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 had the potential to support Treasury's initial minimum criteria for construction of a new CPF. Treasury then evaluated each of these 81 potential sites against its initial 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) (GSA, 2015). Of these 81 potential sites, Treasury identified that 31 sites (see **Figure 2.3-1**) met its minimum criteria, including 25 privately owned sites and six federally owned sites² (GSA, 2015).

Then, in late 2015, Treasury determined that only a site on a federally owned property was reasonable for two primary reasons:

1. 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).
2. Acquiring or leasing a privately owned property in the NCR would cost substantially more than repurposing a portion of existing federally owned property in the NCR.

Therefore, based on these federal requirements and anticipated property acquisition costs, 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. They 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 based on Treasury's [Future Workplace Recommendations Report](#) and Facility Feasibility Study, both completed in 2017 (BEP, 2017b; BEP, 2017c). This refinement further honed the screening criteria that Treasury applied to its site review process, as described in **Section 2.3.1**.

Treasury then conducted a final review of available federal sites in the NCR that could be considered. Treasury consulted with the DoD Washington Headquarters Service to inquire about potential DoD properties, but the DoD was not amenable to transferring administrative control of any property in the NCR to Treasury. Treasury did, however, identify two additional federal, non-DoD sites in the NCR to be advanced to the final screening process, bringing the total to eight federal sites.

² The 25 privately owned sites were located on 22 distinct private properties. The six federally owned sites were located on six distinct federal properties.

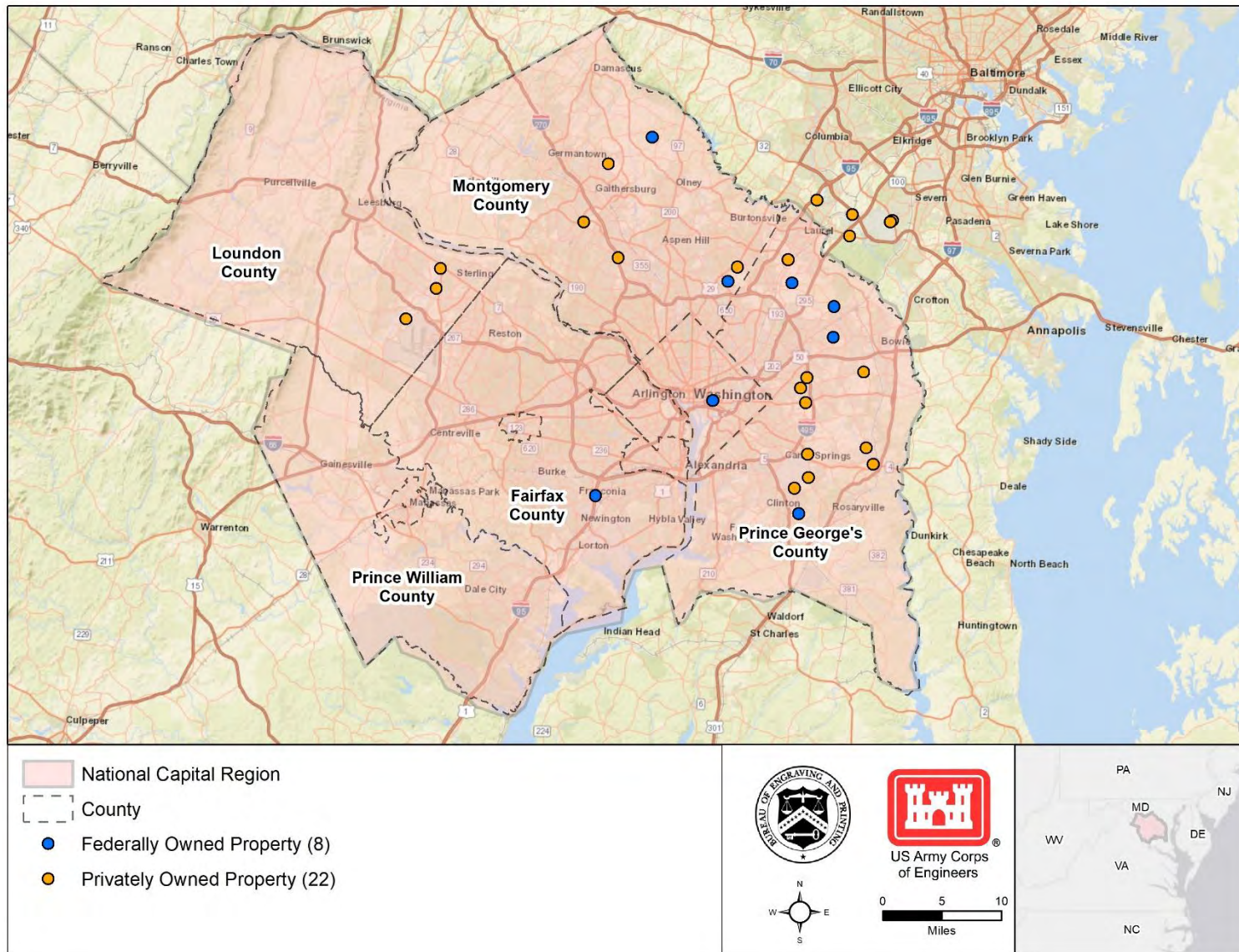


Figure 2.3-1: Potential Sites that met Treasury’s Minimum Criteria

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. Treasury determined these criteria based on Treasury's initial site screening criteria (see **Section 2.3**) and Treasury's subsequent Future Workplace Recommendations Report and Facility Feasibility Study (BEP, 2017b; BEP, 2017c).

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. Treasury increased the minimum parcel size required from 60 to 100 acres based on the following site requirements, as well as Treasury's institutional knowledge of its operations and space utilization at the 100-acre WCF:
 - The CPF would be approximately 1 million square feet in size.
 - The site would need to comply with ISC Level IV security/setback requirements.
 - The site would need to be able to accommodate a potential future building expansion.
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 seven of the eight total federal sites, as discussed individually below. **Table 2.3-1** summarizes the screening criteria satisfied by each of the eight sites Treasury identified for further consideration.

2.3.2.1 Robert F. Kennedy Memorial Stadium

Robert F. Kennedy Memorial 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. 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.

Table 2.3-1. Alternatives Dismissed from Further Analysis

Considered Alternatives	Screening Criteria				
	Location	Accessibility	Availability	Parcel Size	Developability
Robert F. Kennedy Memorial Stadium	✓	✓	✓	X	X
Olney Federal Support Center	✓	✓	✓	X	✓
White Oak Campus	✓	✓	X	✓	✓
Plant Introduction Center	✓	✓	✓	X	✓
GSA Warehouse	✓	✓	X	X	✓
NASA Goddard Space Flight Center	✓	✓	✓	✓	X
Department of Energy Site – Cheltenham, MD	✓	✓	✓	✓	X
BARC – East Airfield	✓	✓	X	✓	✓
BARC – Former Food and Drug Administration (FDA) Laboratory	✓	✓	✓	✓	X
BARC – 200 Area	✓	✓	✓	✓	✓

Green Check: Screening criterion met.

Red X: Screening criterion not met.

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 property is less than 100 acres in size. Therefore, this alternative was dismissed.

2.3.2.3 White Oak Campus

The 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, the property is less than 100 acres in size and not of a suitable configuration (i.e., to support the proposed CPF and ISC security requirements) for Treasury's use. 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.

2.3.2.6 NASA Goddard Space Flight Center

The Goddard Space Flight Center contains a generally unused, heavily wooded, approximately 105-acre parcel located near the intersection of Springfield Road and Good Luck Road in Greenbelt, Maryland. Treasury considered this site to support the Proposed Action; however, the property has hilly terrain and is heavily forested, which would require extensive clearing and earthwork and associated substantial adverse environmental impacts, to accommodate the proposed CPF. In addition, this site lacks adequate existing utility and roadway infrastructure, which would add both cost and environmental impact to accommodate the Proposed Action. Therefore, this alternative was dismissed.

2.3.2.7 Department of Energy Site – Cheltenham, MD

The Department of Energy owns an approximately 117-acre, heavily wooded parcel located immediately west of the Federal Law Enforcement Training Center in Cheltenham, Maryland. Treasury considered this site to support the Proposed Action; however, similar to the Goddard Space Flight Center, the property has hilly terrain, is heavily forested, and lacks adequate existing utility and roadway infrastructure, all of which constitute development constraints and would entail substantial adverse environmental impacts. Therefore, this alternative was dismissed.

2.3.3 Beltsville Agricultural Research Center

The eighth site considered by Treasury was 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).

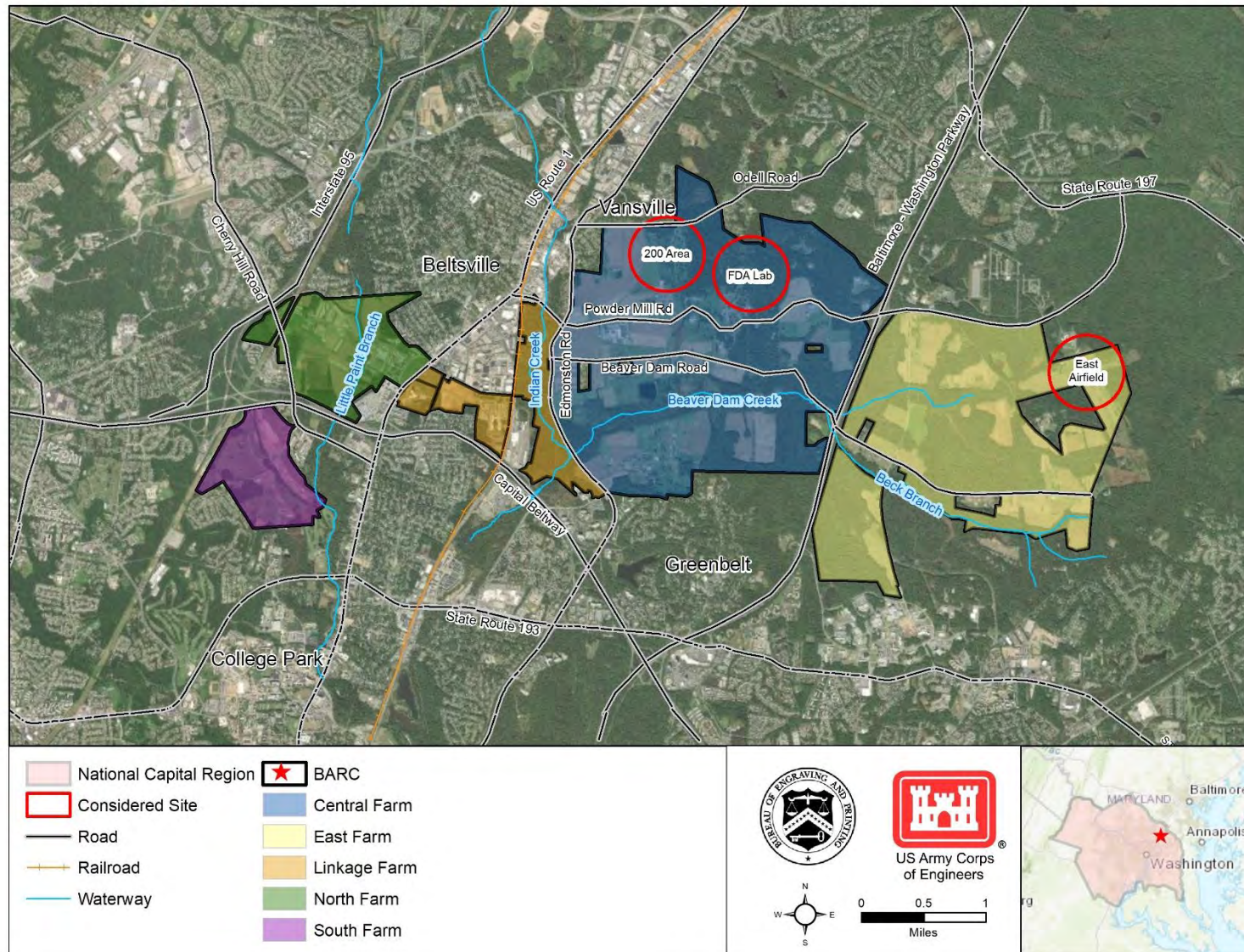


Figure 2.3-2: BARC and the Surrounding Region

BARC met Treasury's purpose and need, as well as 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 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.

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 BARC has recently proposed this site for a solar array, rendering the site unavailable for Treasury's Proposed Action. As such, the USDA removed this site from Treasury's consideration, and 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 contains over 50 existing historic structures, is heavily wooded with hilly terrain that would require extensive clearing and earthwork, and lacks adequate existing utility and roadway infrastructure. These factors constitute significant development constraints that also diminish the potential of this site from an environmental perspective. 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 \[2018\]](#)) 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; however, the USDA intends to relocate these operations to other locations on BARC, independent of Treasury's Proposed Action (USACE, 2020a). Consequently, independent of Treasury's proposal, the site would be unused soon.

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 2.4-1**.

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. Treasury would continue to operate under current conditions to the extent possible, in accordance with all applicable laws, regulations, and permits, 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 (see **Section 1.4**).

The USDA would continue to own Treasury's proposed parcel and be responsible for managing all extant buildings on-site, although none of the buildings would be utilized for USDA operations (see **Section 2.3.3.3**). Under the USDA's continued ownership, the USDA would remain responsible for complying with all applicable federal and state regulations, including the NHPA, RCRA, Toxic Substances Control Act, and OSHA standards. Accordingly, the USDA would be required to prevent or mitigate adverse effects to the BARC Historic District (see **Section 3.9**), to ensure the continued structural integrity and security of existing buildings, and to contain or remediate existing hazardous materials and wastes (see **Section 3.13**) such that there is no potential for significant adverse impacts to the health and safety of BARC employees or other personnel that enter the Project Site.

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 2.4-1**), an approximately 104.2-acre, federally owned, available 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**.

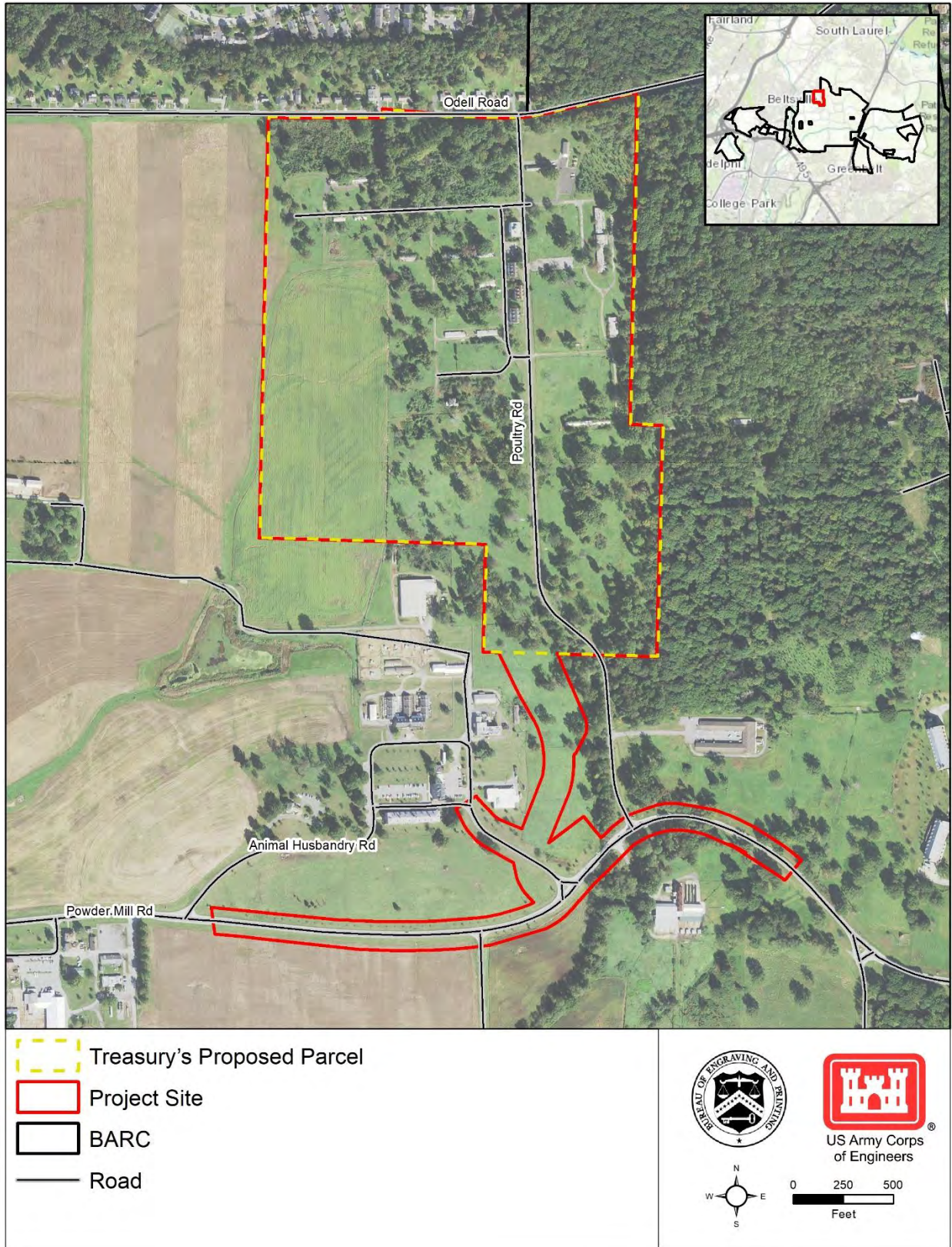


Figure 2.4-1: Project Site (Preferred Alternative) at BARC

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 2.4-1**).

Figure 2.4-2 depicts the preliminary concept site plan of the Preferred Alternative. Treasury developed and identified this concept site plan as the preferred layout during the [Conceptual Site Layouts and Utility Study](#) (BEP, 2020b). This study identified several preliminary concepts for Treasury's consideration based on the site constraints (e.g., required ISC security setback distances and avoidance of important natural resources such as wetlands, specimen trees, and forest stands). Each of the preliminary concept layouts placed the proposed "built" components of the Proposed Action within substantially the same portion of the Project Site to avoid site environmental constraints.

The concept site plan shown in **Figure 2.4-2** is representative of the various preliminary concepts developed and provided a conservative layout for Treasury to use for detailed spatial analysis in this EIS (see **Section 3.0**). Because the design of the proposed CPF is in an early stage of development, this concept design remains subject to change as the design process progresses, and based, in part, on the data presented in this EIS.

Treasury will continue to apply its guiding principles (see **Section 2.2.1**) throughout the design process to focus on deference to the historic nature of the Project Site, integrating the proposed CPF into the natural landscape to minimize its visibility from public off-site areas, being a good neighbor to adjacent residential communities, prioritizing sustainability, and creating an institutional identity appropriate for the BEP.

The current design status, including the manner in which interested stakeholders may follow the design progress beyond the NEPA process, is described in **Section 2.2.1**.

Treasury also notes that two components of the Preferred Alternative, discussed below, are not currently "ripe" for analysis: proposed off-site utility work and recommended traffic mitigation measures (see **Section 3.10.3**). If Treasury selects the Preferred Alternative for implementation in the ROD, Treasury would tier additional NEPA analysis off this FEIS, in accordance with 40 CFR 1502.20 and 1508.28, once the design has progressed to the point that Treasury can identify reasonable potential LODs and conduct a meaningful environmental analysis for all relevant resource areas, including consultation with regulatory agencies.

- 1. Proposed Off-site Utility Work:** Currently, Treasury anticipates it may need to construct approximately 1 mile (i.e., 4,600 to 5,600 linear feet) of new force main to tie its sanitary sewer system into the USDA's existing sanitary sewer lines south of the Project Site. Treasury also may need to upgrade electrical utilities servicing the proposed CPF, and conduct work in off-site locations.
- 2. Recommended Traffic Mitigation Measures:** As described in **Section 3.10.3**, Treasury has identified various methods through which it could mitigate potential adverse impacts to traffic and transportation. Specifically, there are seven local intersections for which Treasury would consider mitigation measures. If Treasury selects the Preferred Alternative for implementation in its ROD for this NEPA process, Treasury will also identify in the ROD which traffic mitigation measures it will implement, if any.

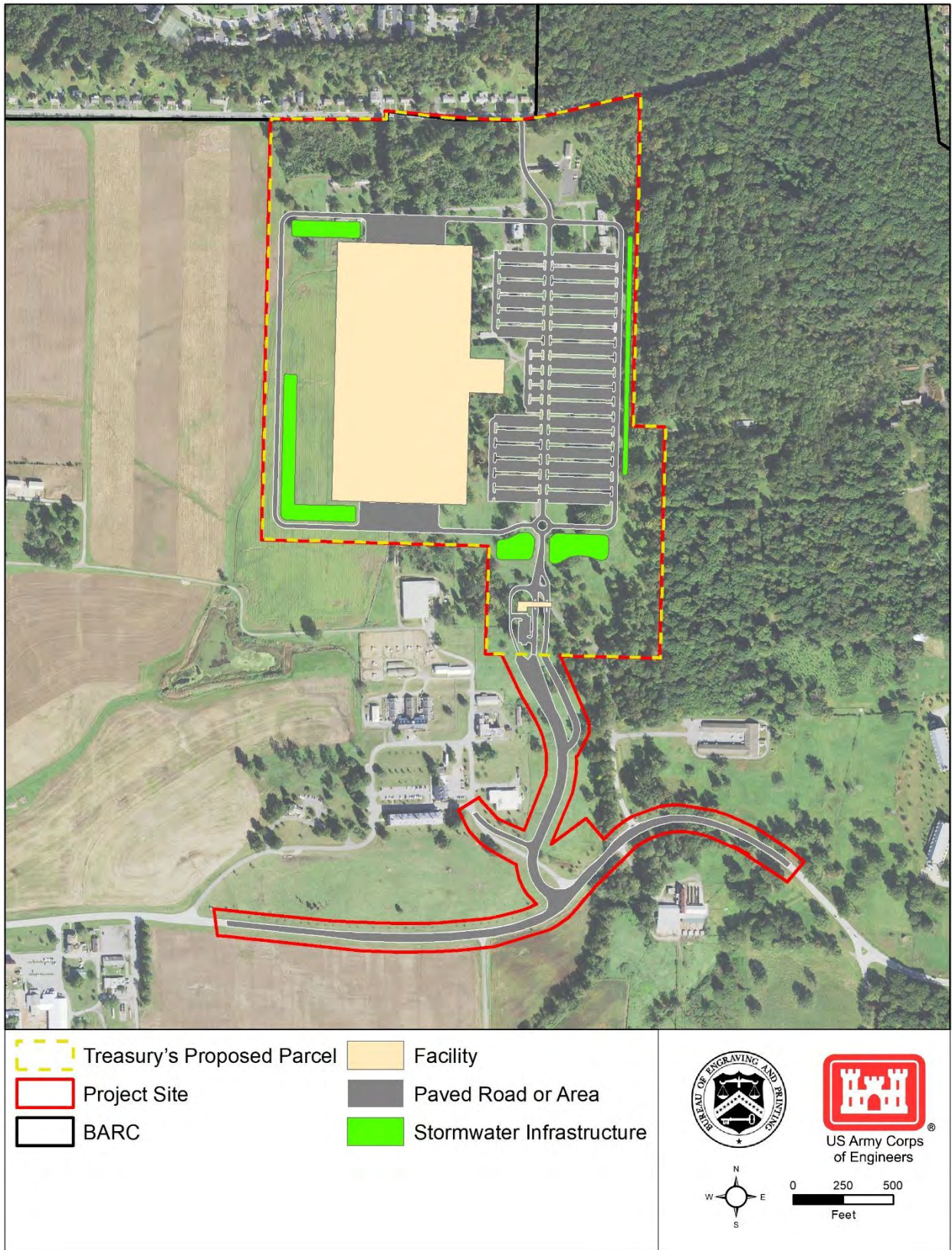


Figure 2.4-2: Concept Site Plan of the Preferred Alternative

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.

Table 2.5-1: Summary of Potential Environmental Impacts on Evaluated Resource Areas¹

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.	<u>Construction:</u> Less-than-significant adverse impact on surrounding land uses from construction activities. <u>Operation:</u> 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.	<u>Construction:</u> 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. <u>Operation:</u> Less-than-significant adverse impacts to views from roadways; significant adverse impacts to views from residences along Odell Road; negligible adverse impacts along Powder Mill Road from a new traffic control device; significant adverse impacts on nighttime lighting levels for residences along Odell Road.
Air Quality	No impact on air quality.	<u>Construction:</u> Less-than-significant adverse impacts from criteria pollutant, fugitive dust, and GHG emissions; negligible adverse impacts from hazardous air pollutant (HAP) emissions. <u>Operation:</u> 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.	<u>Construction:</u> Less-than-significant adverse impacts on noise-sensitive receptors from construction activities. <u>Operation:</u> 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 armored 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
<p>Topography and Soils</p>	<p>No impact to topography. Less-than-significant adverse impact to soils from the release of contaminants due to building deterioration.</p>	<p><u>Construction:</u> No or negligible adverse impact to soils from vegetation removal and compaction; no impact to topography. <u>Operation:</u> No or negligible adverse impact from stormwater runoff; no significant impact to designated farmland soils; no impact to topography.</p>
<p>Water Resources</p>	<p>No impact on water resources.</p>	<p><u>Construction:</u> 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. <u>Operation:</u> 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.</p>
<p>Biological Resources</p>	<p>No impact on biological resources.</p>	<p><u>Construction:</u> Less-than-significant adverse impact on forest resources and vegetation from the conversion of vegetated land to developed land; no impact on invasive species; 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 bald eagles and migratory birds. <u>Operation:</u> 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; negligible impact on bald eagles and migratory bird from an increase in ambient noise and light levels; less-than-significant adverse impact on migratory birds from the potential for window strikes.</p>
<p>Cultural Resources</p>	<p>No impact on archaeological or paleontological resources. Less-than-significant adverse impact on the BARC Historic District and its contributing resources due to building neglect and deterioration.</p>	<p><u>Construction:</u> No impact to one potential National Register of Historic Places (NRHP)-eligible archaeological site; no impact on paleontological resources; less-than-significant adverse impacts on previously unknown archaeological and paleontological sites if discovered during construction; less-than-significant adverse impact from the demolition of 22 contributing resources to the BARC Historic District. <u>Operation:</u> 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.</p>

Resource Area	No Action Alternative	Preferred Alternative
<p align="center">Traffic and Transportation</p>	<p>Treasury would have no impact on traffic or transportation. However, regional background growth of the area would result in:</p> <p>Less-than-significant adverse impacts on traffic and public transit and negligible impacts on pedestrian and bicycle facilities in the regional ROI.</p> <p>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.</p> <p>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.</p>	<p><u>Construction:</u> 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.</p> <p><u>Operation:</u> Less-than-significant adverse impact on roadways in the regional ROI; less-than-significant adverse impact to local traffic during congested periods; less-than-significant adverse impact on public safety from potential cut-through traffic; 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 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; less-than-significant adverse impact to the pedestrian and bicycle network; negligible adverse impacts to public transit and transit revenue from shifts in ridership.</p>
<p align="center">Utilities</p>	<p>No impact on utilities.</p>	<p><u>Construction:</u> 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.</p> <p><u>Operation:</u> Negligible adverse impacts on utility demand and availability from increased usage.</p>
<p align="center">Socioeconomics and Environmental Justice</p>	<p>No impact to the socioeconomic environment or EJ communities.</p>	<p><u>Construction:</u> 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.</p> <p><u>Operation:</u> 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.</p>

Resource Area	No Action Alternative	Preferred Alternative
<p>Hazardous and Toxic Materials and Waste</p>	<p>Less-than-significant adverse impact from existing buildings falling into disrepair.</p>	<p><u>Construction:</u> Less-than-significant adverse impact from accidental release of HTMW; beneficial impact from removal and off-site disposal of regulated building materials.</p> <p><u>Operation:</u> 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.</p>
<p>Human Health and Safety</p>	<p>Less-than-significant adverse impact to Treasury staff from the continued use of the DC Facility and the inability to address safety and security risks.</p> <p>Less-than-significant adverse impact to BARC staff from the continued presence of HTMW and unsafe buildings on BARC.</p>	<p><u>Construction:</u> 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.</p> <p><u>Operation:</u> 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.</p>

1. In the “No Action Alternative” and “Preferred Alternative” columns, **bold typeface** identifies potential 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. 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
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](#).

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.
Topography and Soils	<p>Geology: No excavation is proposed beyond 25 feet below ground surface (bgs), and there is no potential to affect susceptibility to landslides, seismic hazards, or migration of radon:</p> <p>Landslides: The Project Site is relatively flat and poses no risk of landslides.</p> <p>Seismic Hazards: The Project Site is located in an area of low risk for seismic hazards (USGS, 2018).</p> <p>Radon: Average radon levels around the Project Site are below the USEPA's recommended mitigation threshold (USEPA, 2016).</p> <p>The reader is referred to the Topography and Soils Technical Memorandum for additional information.</p>
Water Resources	<p>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).</p> <p>Chesapeake Bay Critical Area: The Project Site is not located within and would not disturb or affect any Chesapeake Bay Critical Areas (DNR, 2020).</p> <p>The reader is referred to the Water Resources Technical Memorandum for additional information.</p>
Socioeconomics and Environmental Justice	<p>Protection of Children (EO 13045): The percentage of children in the population of the EJ ROI is similar to those of Prince George's County and Maryland. Further, all Proposed Action 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.</p> <p>The reader is referred to the Socioeconomics and Environmental Justice Technical Memorandum for additional information.</p>

3.1.3 Framework for Impact Analysis

Each subsection summarizes the baseline environmental conditions within a resource-specific ROI, or the area that could experience impacts from the Proposed Action. The ROI is limited to the Project Site for some technical resource areas (e.g., topography and soils), but often includes off-site areas that may be impacted (e.g., downstream receiving waterbodies). Treasury provides the rationale for the ROI 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 1 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 due to proximity. Areas beyond 1 mile from the Project Site would not experience impacts from the Proposed Action that could meaningfully affect land use.

Land use ROIs often include a community, metropolitan area, county, state, or region. Although the Proposed Action would directly change land use within a small portion of BARC from agriculture to non-agriculture, the land would still be used for federal activity and thus the underlying use would remain unchanged. Additionally, federal land is not subject to local land use or zoning regulations. However, Treasury selected a 1-mile radius ROI to evaluate land use patterns and conditions in the area in which

BARC is a neighbor. This ROI allows Treasury to identify both local and metropolitan land use conditions. A smaller ROI that focused only on the BARC property would overlook external development patterns and conditions in the surrounding community.

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](#), the NCPCC [Comprehensive Plan for the National Capital](#), the [Prince George's County Economic Development Strategic Plan](#), and [EO 12072, Federal Space Management](#). Collectively, these regulations and guidance documents specify permitted land uses and long-term recommendations for future development, including by the federal government. 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 Space³ (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 The Reserved Open Space zoning classification includes a limited range of public, recreational, and agricultural uses (M-NCPPC, 2020).

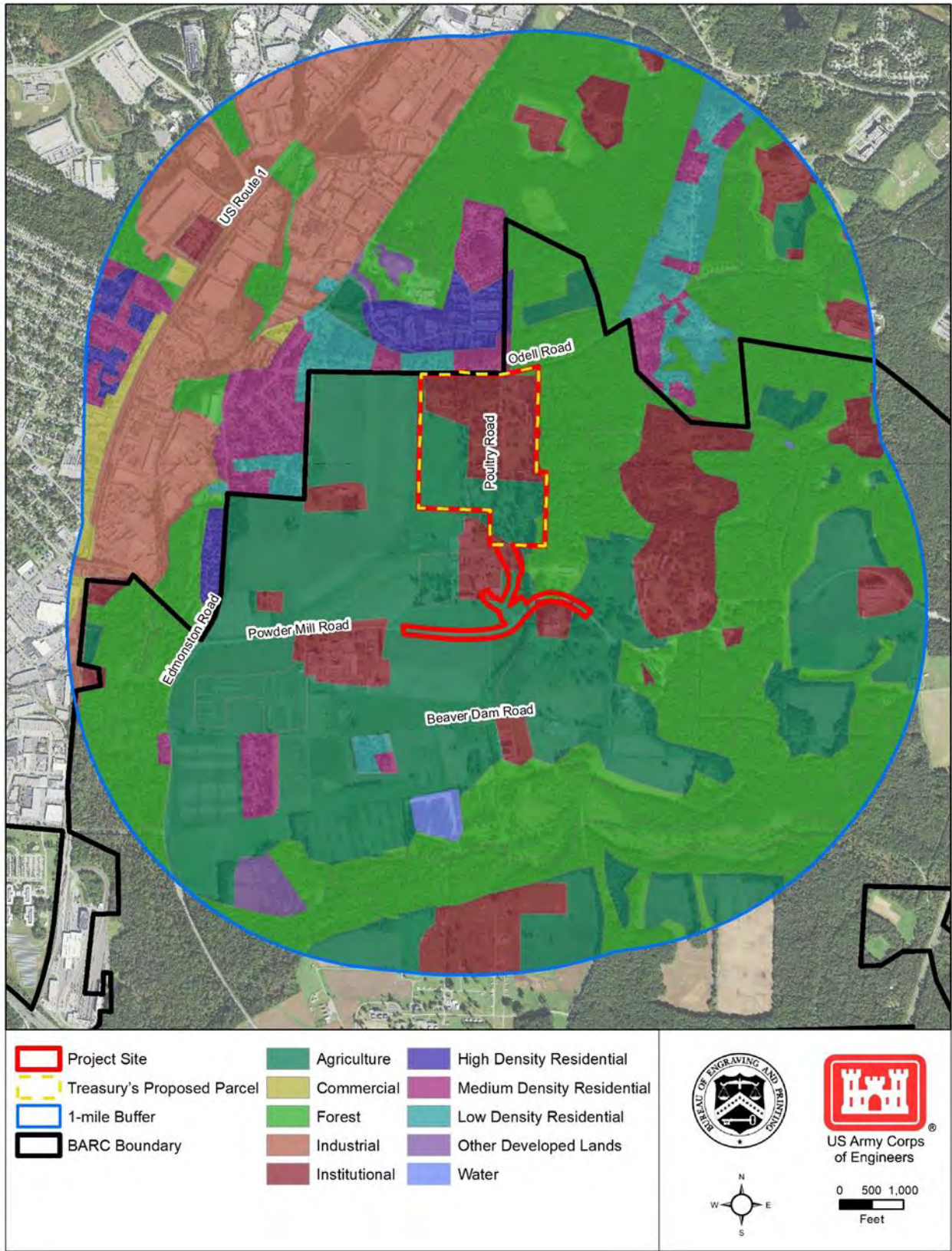


Figure 3.2-1: Existing Land Use within the ROI

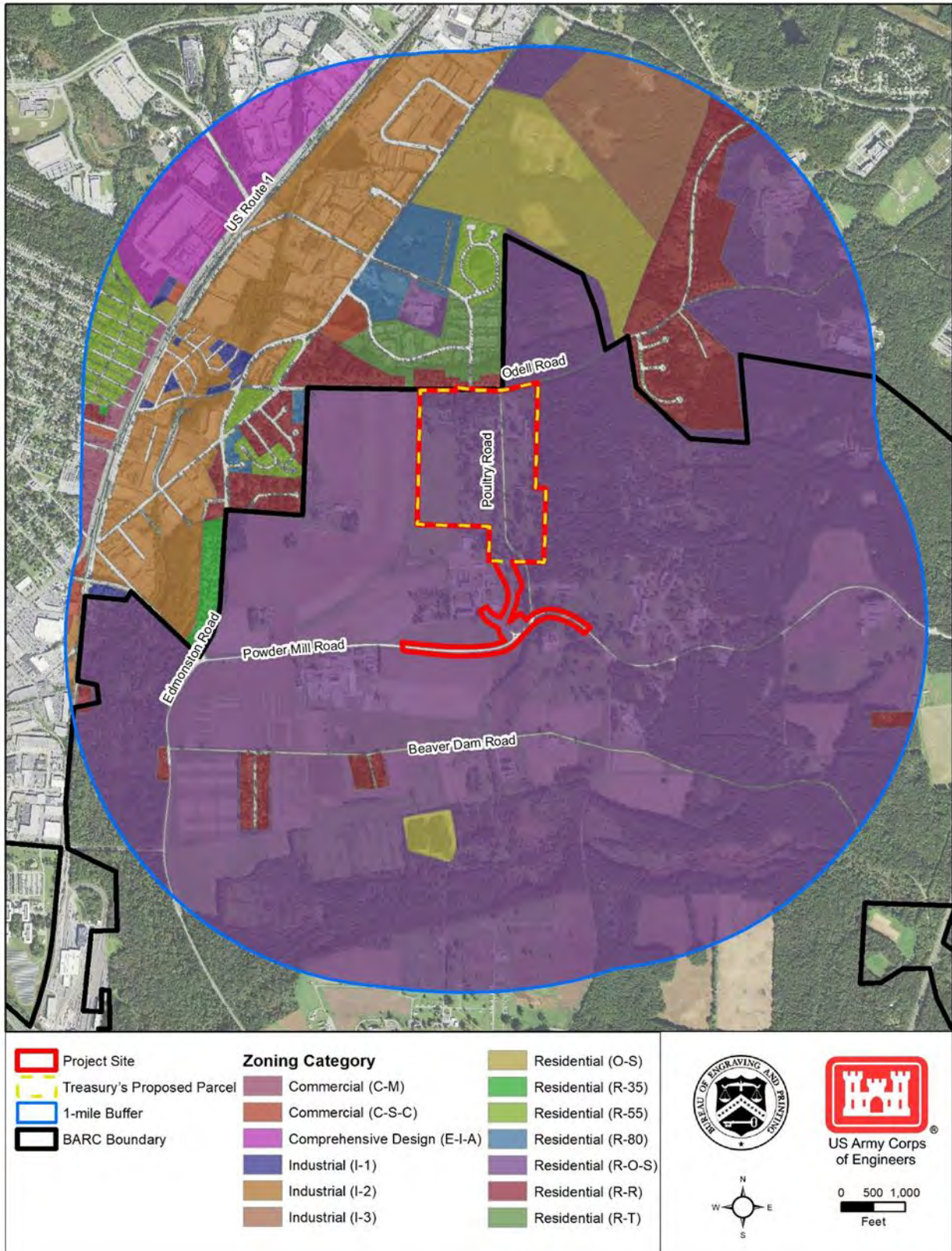


Figure 3.2-2: Existing Zoning within the ROI

3.2.2 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 could continue to fall into disrepair and contribute to blight that could affect other nearby properties. As these buildings have been vacant for at least 8 years, and many for longer, the continuation of deterioration would be unlikely to result in discontinuation of or substantial change in existing adjacent land uses. Therefore, adverse impacts to land use at the Project Site and in the ROI would remain **less-than-significant adverse**. Further, the No Action Alternative would not preclude future redevelopment of the Project Site by another federal proponent with Congressional authorization.

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, thereby providing a greater sense of separation between existing adjacent off-site land uses and the active construction site. Construction activities would be temporary 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. Further, Treasury would use the site for innovative industrial technologies and employ approximately 1,600 staff, consistent with the Prince George's County Economic Development Strategic Plan (M-NCPPC, 2013). 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 or substantially altered 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.

Additionally, while the Proposed Action would contribute to the loss of land for agricultural research activities, the USDA has indicated that it does not need, and plans to discontinue existing operations in, this particular parcel on BARC. Thus, the conversion of agricultural research acreage would not adversely affect the USDA’s operations at BARC or the availability of land for the USDA’s current or foreseeable future requirements.

BARC, however, is included in Prince George’s County’s Priority Preservation Area and the NCP’s regional parks and open space network (M-NCPPC, 2012; NCP, 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 land use and zoning impacts:

- Although not required, petition Prince George’s County for a zoning reclassification of Treasury’s proposed parcel from “Residential” to “Industrial.”
- As described in **Section 3.3.3**, establish landscape buffers, including appropriate-height vegetation, on all sides of Treasury’s proposed parcel to minimize views from off-site areas, to the extent practicable while still meeting site security requirements.

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 notably 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. Please note that the dashed line along portions of the ROI in **Figure 3.3-1** indicates “filtered” views, such as through trees. **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](#)).

Due to a rise in topography south of the Project Site, it is possible that the proposed CPF would be visible beyond the identified ROI (e.g., from certain portions of Ridge Road in the City of Greenbelt, located approximately 1.7 miles south of Treasury’s proposed parcel). However, these views would be at a greater distance and intermittent due to shielding by vegetation, other structures, and other elements between the viewpoint and the proposed CPF. As described in the [Visual Resources Technical Memorandum](#), visual quality analyses focus on accessible, public viewsheds; this analysis includes residential views from Odell Road due to their immediate proximity to the Project Site.

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](#)⁴ (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.

3.3.1.3 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.

⁴ 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.

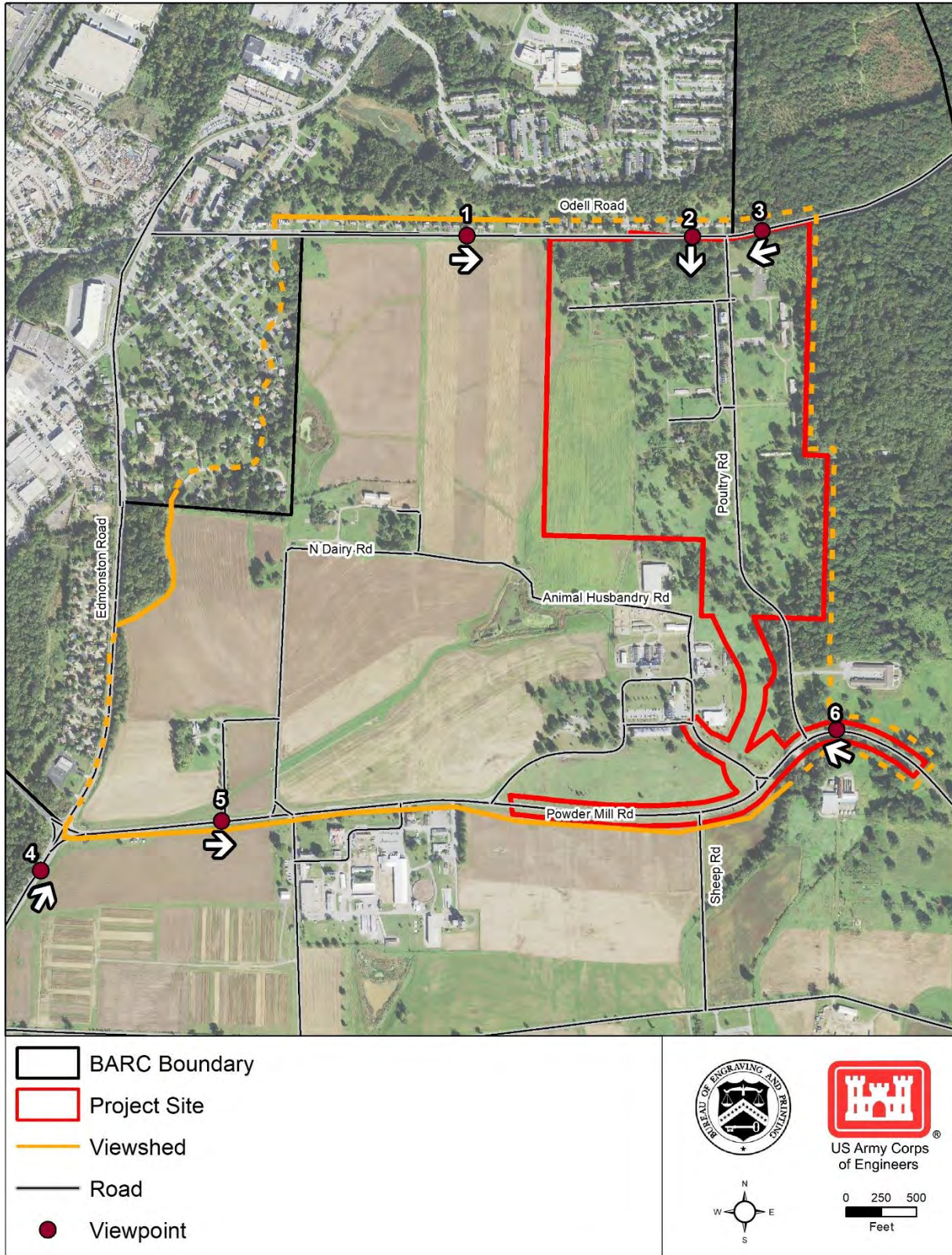


Figure 3.3-1: Visual Resources ROI

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 during construction. 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. Treasury would consider installing appropriate-height plantings along the fence line to add a more natural aesthetic. 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) with a manufacturing facility and security fence, thereby permanently altering the character of the views from those homes. Therefore, the Preferred Alternative would result in **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. The Treasury would minimize off-site light pollution through sensitive design of the proposed CPF to the extent feasible, including consideration of the IDA's [five principles for responsible outdoor lighting](#) (IDA, n.d.). For example, Treasury would install cameras and associated lights as low to the ground as practicable, thereby reducing light spillover off-site. However, even with sensitive design, the proposed CPF may remain distinctly visible within the ROI at night. As such, operation would result in **significant adverse impacts** on nighttime lighting levels in the ROI, and specifically for up to 34 residences along Odell Road.

The Greenbelt City Observatory is located approximately 2.2 miles southeast of the proposed CPF. With implementation of the EPMS described in **Section 2.2.4**, the Proposed Action would be unlikely to adversely impact the observatory due to its distance from the proposed CPF and intervening vegetation. Recommended mitigation measures listed in **Section 3.3.3** would further reduce the potential for adverse impacts to the observatory.

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. Fencing material and design character should be open to the extent permitted by security criteria with the understanding that the perimeter fencing should not appear visually defensive.
- Establish landscape buffers, including appropriate-height vegetation, on all sides of Treasury's proposed parcel to minimize views from off-site areas, to the extent practicable while still meeting site security requirements. The natural topography obscures the views of the new building from the adjacent public roads.
- 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 primary ROI for this analysis is Prince George's County and the NCR. This primary ROI is used to determine the Proposed Action's regulatory compliance with the criteria described below (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](#)).

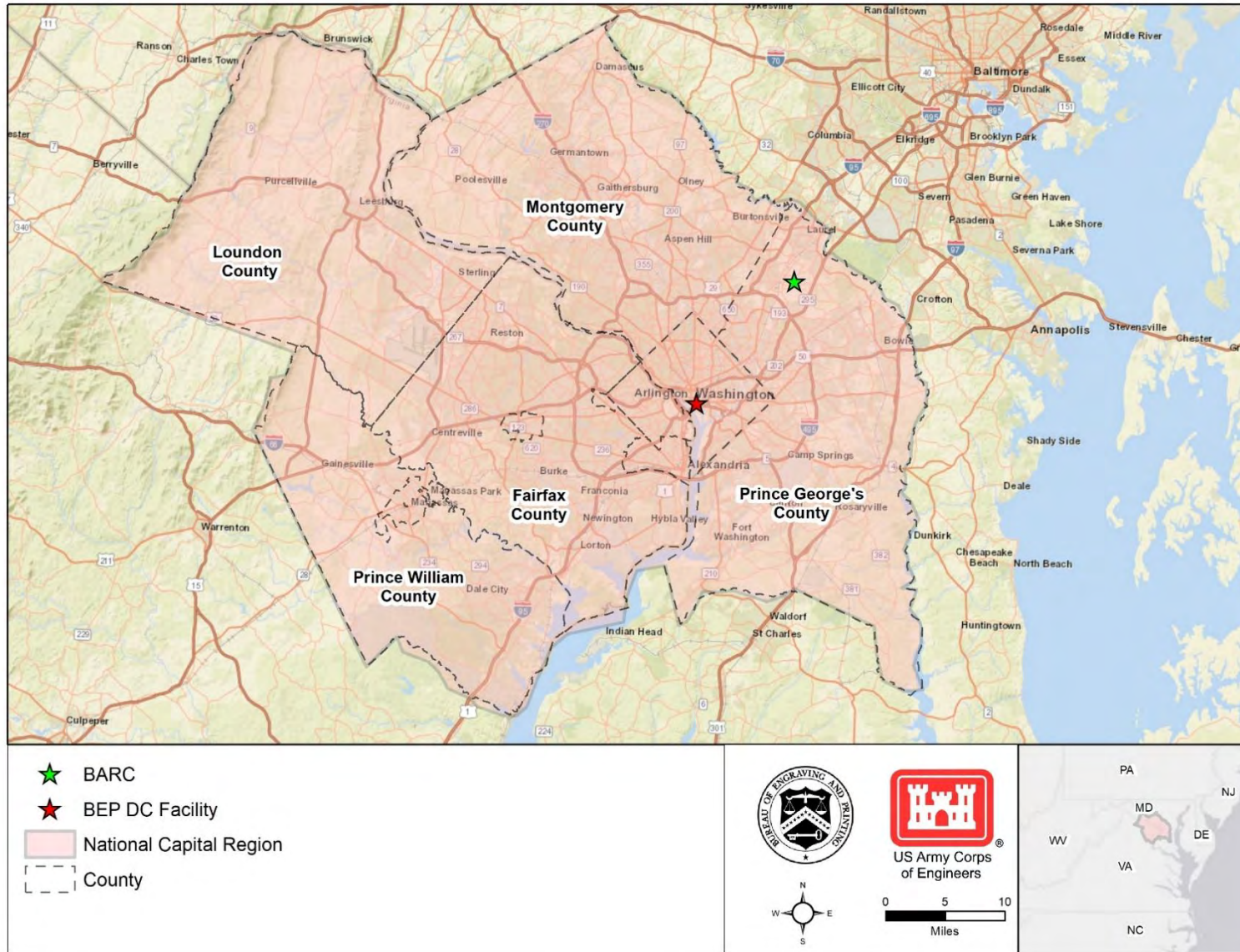


Figure 3.4-1: Air Quality Primary ROI (for Regulatory Compliance)

A local ROI, which is the area within 1,500 feet of the Project Site, is used in this analysis as the area where sensitive receptors may experience localized air quality impacts (e.g., from fugitive construction dust) from activities occurring at the Project Site (see **Figure 3.4-2**).

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 (O₃) and in maintenance for 2008 8-hour O₃ 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, 2019a). The 2019 data from these two air monitoring stations indicate that Beltsville has 8-hour O₃ levels that exceed NAAQS (USEPA, 2019d).

A [2017 inventory](#) by MDE found annual state-wide GHG emissions to be approximately 78,493,210 metric tons of carbon dioxide (CO₂) equivalent (CO₂e)⁵ (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 emit⁶ (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).

⁵ 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 CO₂, which has a value of one. The equivalent CO₂ 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 CO₂ equivalent (CO₂e) (Yale Climate Connections, 2009).

⁶ 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.

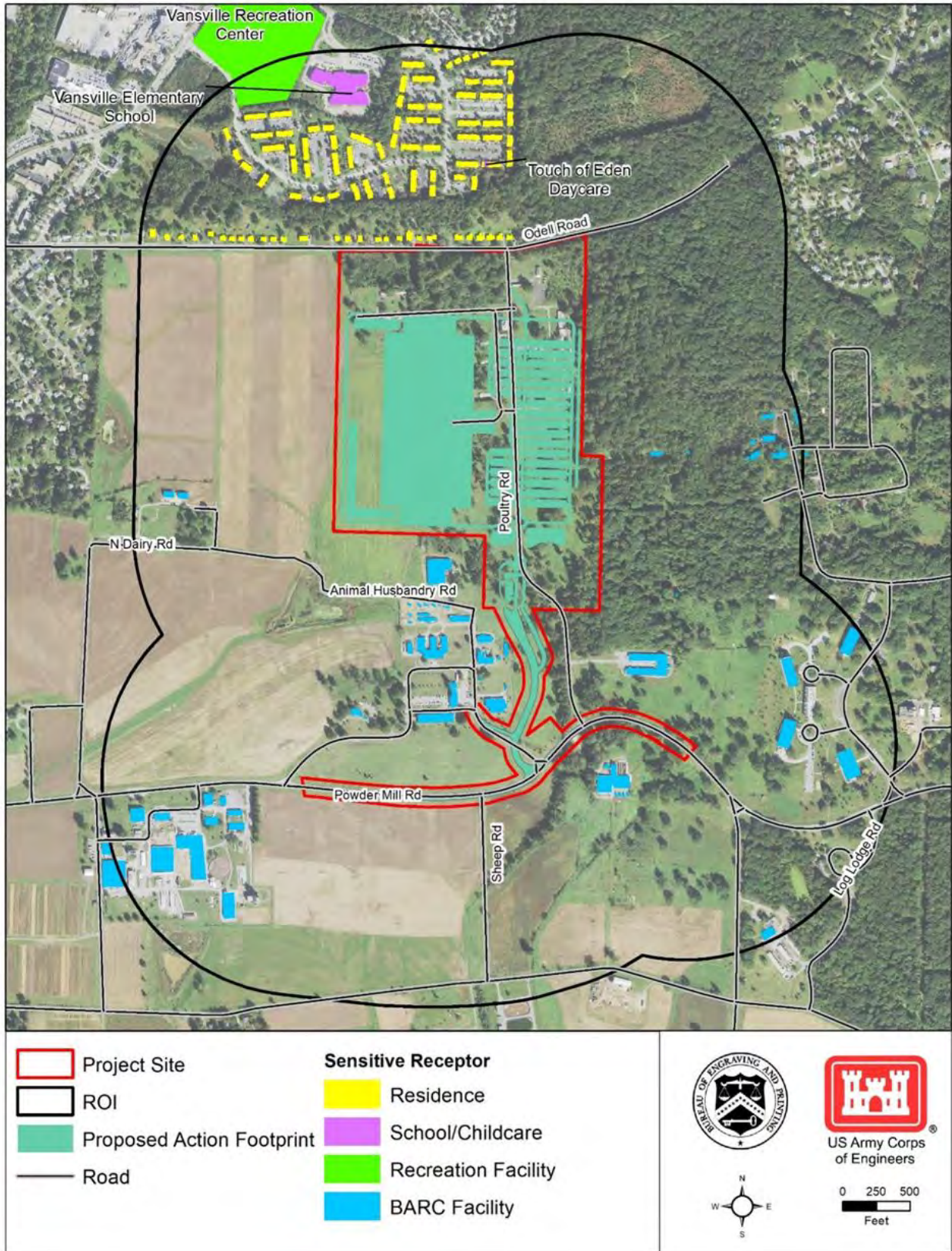


Figure 3.4-2: Air Quality Local ROI and Potential Sensitive Receptors

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

Pollutant	Sources	DC Facility 2018 Actual (tons per year [tpy], or metric tons CO ₂ e for GHGs)	DC Facility PTE (tpy)	WCF PTE (tpy) and 2018 Actual GHGs (metric tons CO ₂ e) 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 ³	plating lines	2.99E-06	8.70E-04	<0.01
HAP: Nickel ³	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	various stationary sources, including presses, diesel emergency generators, and fire pumps	21,974 ⁴	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. Treasury may not incorporate operations using chromium and nickel into the proposed CPF; therefore, these particular emission values may not be relevant to the proposed CPF.
4. The Landover warehouse contributes 781 metric tons of CO₂e to this total.

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 CO₂e per year). Current and planned projects for future emission reductions include replacing nickel plate electroforming with laser engraving, replacing 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 such as rooftop solar arrays, installing a green roof on the proposed CPF, and continuing to conduct comprehensive air emission and GHG evaluations (BEP, 2019a).

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). The Project Site is also generally vegetated (see **Section 3.8.1.3**), which contributes slightly to carbon sequestration. 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 located within the local ROI 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.

For additional information on human receptors in the local 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 lead [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*⁷ 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

⁷ *De minimis* levels are minimum thresholds for criteria pollutants in non-attainment and maintenance areas.

area pollutants (i.e., O₃ 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.

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 NO _x , 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	

Green Shading: Projected PTE emissions would be below *de minimis* thresholds.

Table 3.4-3 shows the projected actual criteria pollutant emissions that the Proposed Action would generate during operation⁸. 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.

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**.

⁸ 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.

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

Emission Source	Projected Actual Emissions (tpy)						<i>De minimis</i> 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 NO _x , 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	

Green Shading: Projected actual emissions would be below *de minimis* thresholds.

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 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.

Much of the existing vegetation on the Project Site (see **Section 3.8.1.3**) would be removed during construction, thereby reducing the site's ability to sequester carbon during the construction period; however, long-term carbon sequestration functions would be replaced in part by trees and other vegetation planted on-site in accordance with the FCP and Planting Plan. As such, construction and operation of 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 three noise regulations that apply to the Proposed Action: the [Noise Control Act of 1972](#) (42 USC 4901); [OSH Standards: Occupational Noise Exposure](#) (29 CFR 1910.95); 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.

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. For purposes of this analysis, Treasury assumed that existing noise experienced by receptors 50 feet from the ROI's roadways is 80 dBA (Caltrans, 2014). Odell Road, a residential road immediately north of the Project Site, has a minimum ambient noise level of 43 dBA (Cerami, 2021).

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, BARC buildings (which are often contributing resources to the BARC Historic District), 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.

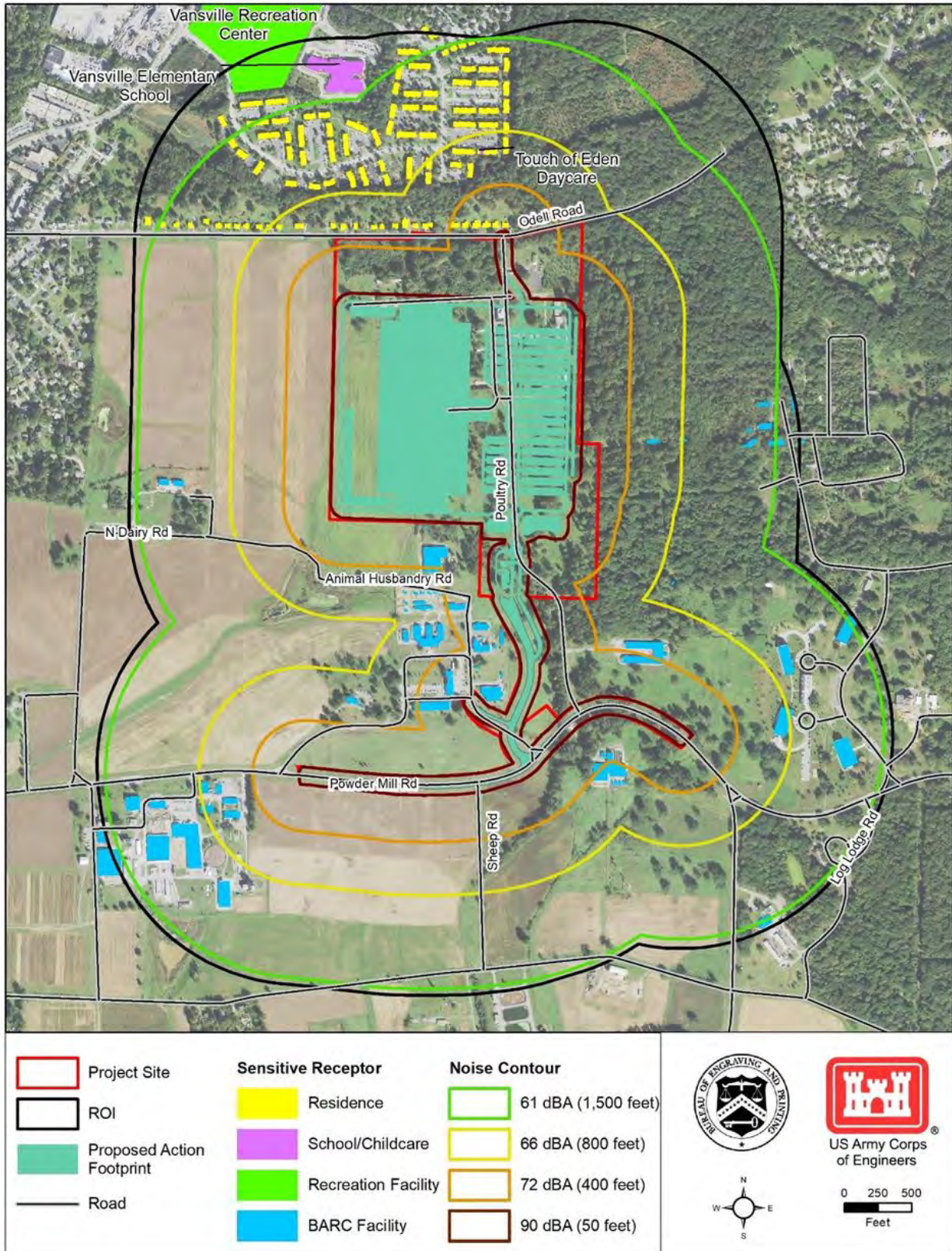


Figure 3.5-1: Noise ROI and Proposed Construction Noise Contours

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**)⁹. 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 (i.e., Treasury's emergency exit road) between the proposed CPF and Odell Road. Additionally, several BARC facilities located immediately south of the Project Site could also experience noise levels between 72 and 90 dBA during construction of the Proposed Action, particularly 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.

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.

⁹ 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 (e.g., currency presses and HVAC equipment) and daytime operational vehicle and truck traffic, would have a **negligible adverse impact** on noise-sensitive receptors in the ROI and personnel working at the proposed CPF. Appropriate equipment enclosures and/or additional shielding measures would ensure that noise levels experienced by noise-sensitive receptors in the ROI would be in accordance with the Prince George's County Noise Ordinance for residential areas (i.e., 65 dBA or less during the day and 55 dBA or less at night).

No tractor trailer deliveries to the proposed CPF would occur at night. Nighttime currency shipments would use armored trucks, which produce less noise than tractor trailers (Cerami, 2021). These armored truck shipments would only be able to access the Project Site via Powder Mill Road, thereby avoiding passing within 50 feet of non-federal noise-sensitive receptors along Odell Road to the extent possible. Further, armored truck loading docks would be located within the proposed CPF, so loading would not generate exterior noise. Treasury anticipates that potential nighttime noise levels from armored trucks would be less than 34 dBA (Cerami, 2021); however, since these shipments would occur at night, the noise-sensitive receptors around the site may experience **less-than-significant adverse impacts**.

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

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

- As described in **Section 3.3.3**, establish landscape buffers, including appropriate-height vegetation, on all sides of Treasury's proposed parcel to further reduce off-site noise, to the extent practicable while still meeting site security requirements.

3.6 Topography and Soils

This section describes the 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 [Topography and Soils Technical Memorandum](#) for additional, more detailed information related to the data presented in each of the following sections.

The Proposed Action has **no potential** to impact geology (including seismic hazards, landslides, and radon); as such, geology is not subject to further analysis herein.

3.6.1 Affected Environment

3.6.1.1 Region of Influence

The ROI for 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.

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

Topography

The Project Site is relatively flat, generally ranging from 125 to 170 feet above mean sea level (see **Figure 3.6-1**). Elevations as low as 110 feet above mean sea level are present along the water features near the proposed entrance road. Generally, the Project Site slopes gently downward to the south and west. The eastern edge of the Project Site rises slightly to the base of a forested hill that peaks at 235 feet above mean sea level just east of the Project Site. The western portion of the Project Site, particularly the existing cropland, is the flattest portion.

Soils

Figure 3.6-2 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 3.6-2**); 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 topographic and 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 [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 potential ongoing deterioration of on-site buildings may release contaminants to the adjacent soils, potentially resulting in a **less-than-significant adverse impact** to soil resources on the Project Site (see **Section 3.13.2.1**).

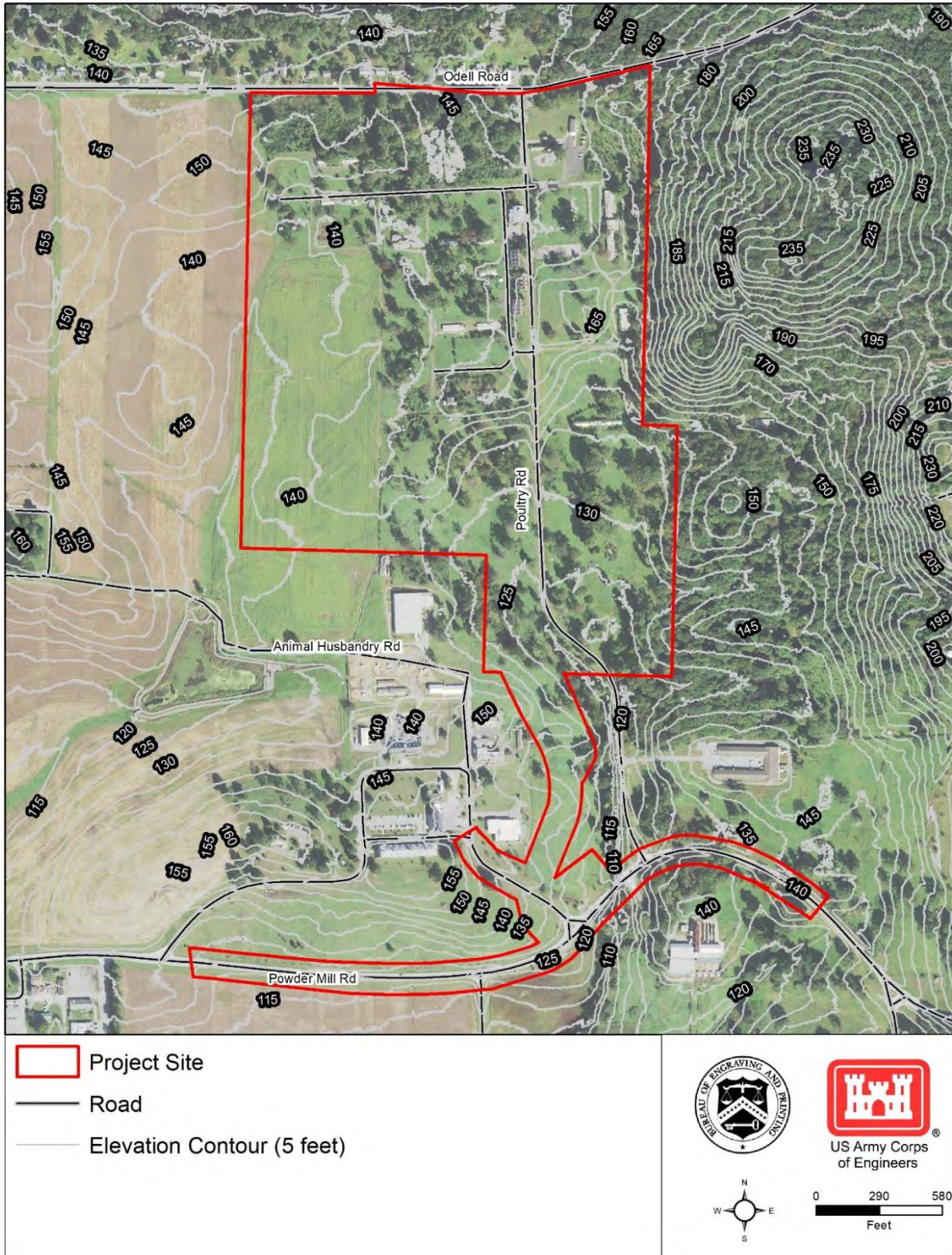


Figure 3.6-1: Project Site Topography

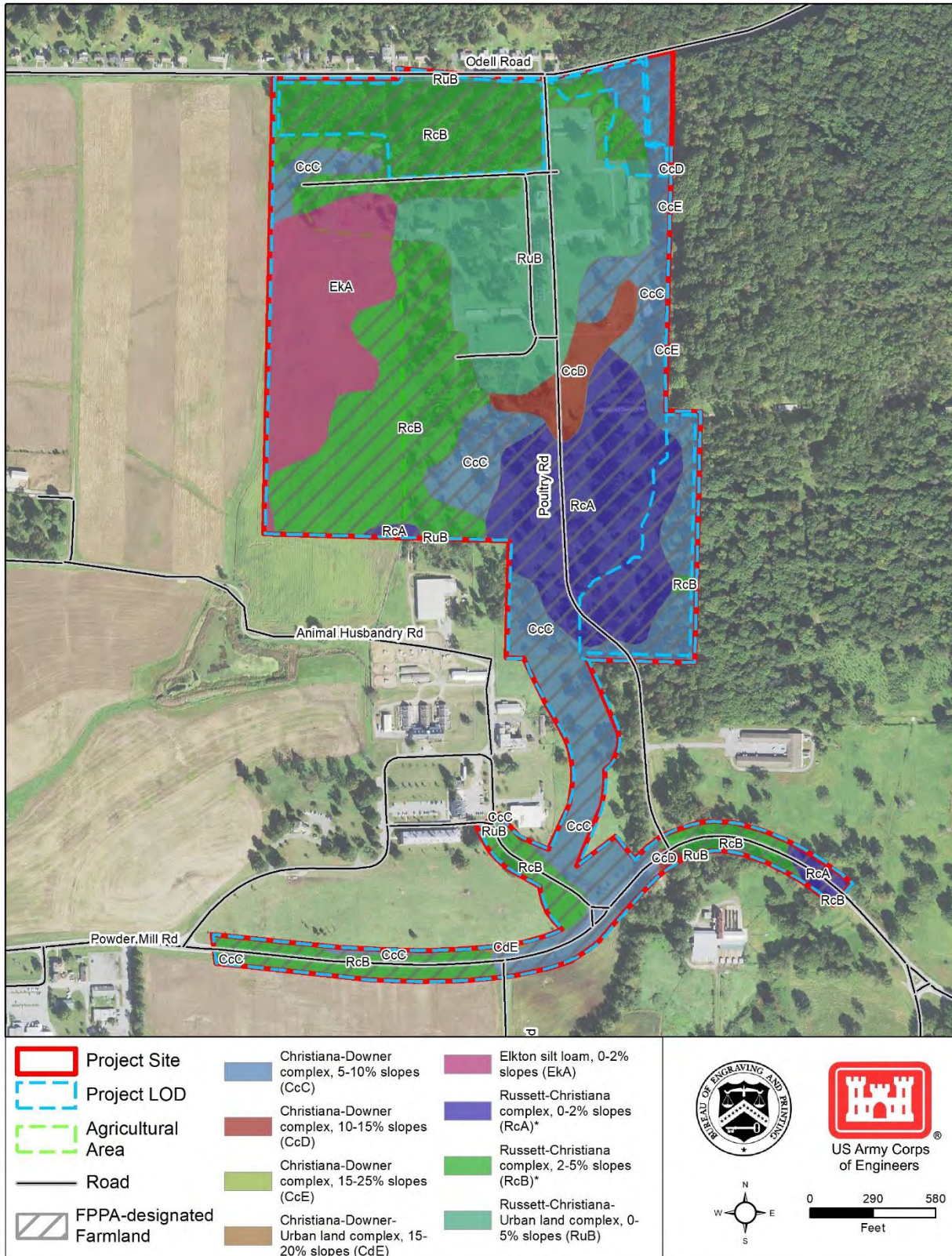


Figure 3.6-2: Project Site Soils

3.6.2.2 Preferred Alternative

Topography

Construction

Construction of the proposed CPF would involve excavation, grading, leveling, and similar earthwork. These activities would alter topography on portions of the Project Site; however, these effects would be minimized by locating the facility in the most level (i.e., west-central) portion of the Project Site. Excavation up to 25 feet bgs would be required on the eastern portion of the Project Site. However, the Proposed Action would be designed to ensure that grading and leveling activities balance cut-and-fill by redistributing clean excavated soils to other locations on the Project Site. Construction would not create unsightly or unsafe topographic features. Overall, the Proposed Action would result in minor topographical changes on the Project Site, but these changes would have **no adverse impact**.

Operation

Operation of the Proposed Action would have **no effect** on topography.

Soils

Construction

The construction LOD of the proposed CPF includes approximately 100.3 acres, or 82.1 percent, of the Project Site (see **Figure 3.6-2**). 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.

Operation

Once constructed, the Proposed Action would increase impervious surface cover on the Project Site from 17.3 to up to 46.7 acres (or by up to 29.4 acres), comprising up to 38.2 percent of the Project Site. This estimate is conservatively high, as it does not account for the acreage of the GI/LID techniques Treasury plans to incorporate into the Proposed Action design (e.g., green roofs, permeable pavement, reinforced turf paving, etc.) These GI/LID measures would reduce the amount of impervious surface cover proposed.

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 [Topography and Soils Technical Memorandum](#) for NRCS consultation documentation.

Finally, the state of Maryland, Prince George's County, and the NCPD 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, 2020b).

3.7.1.2 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.

3.7.1.3 Existing Conditions

Surface Waters and Water Quality

Surface waters¹⁰ 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).

¹⁰ 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 \(WQS\)](#).

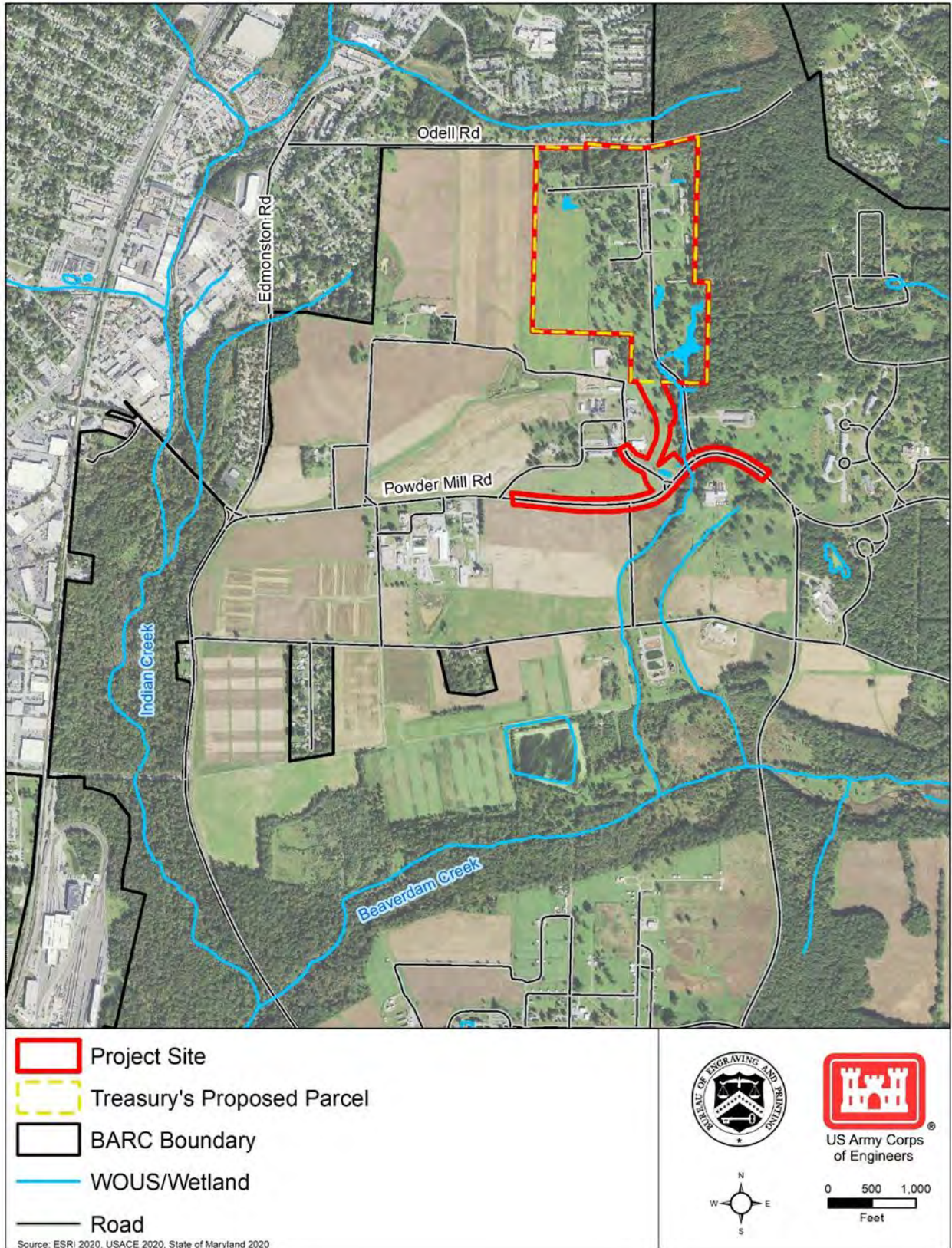


Figure 3.7-1: Water Resources ROI

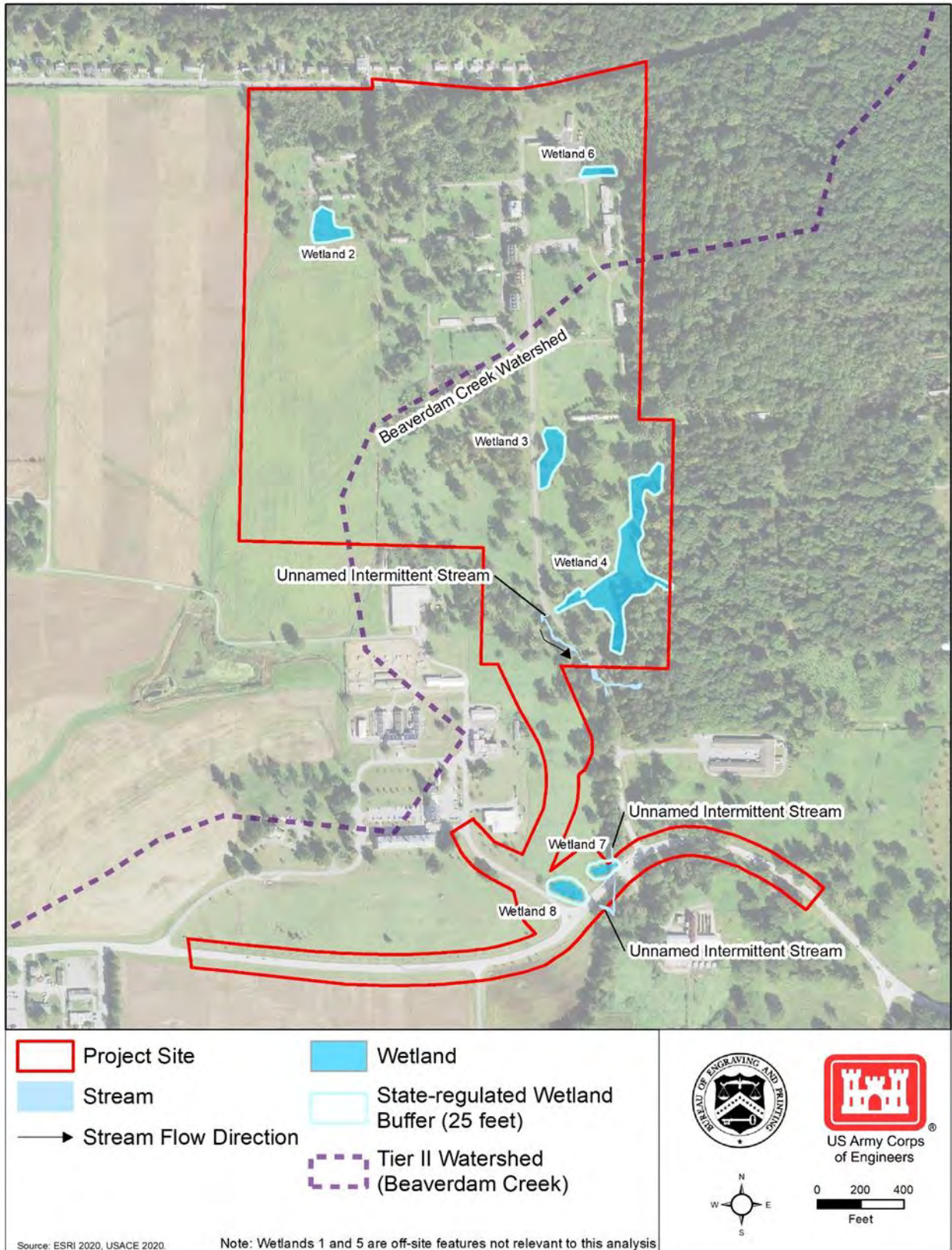


Figure 3.7-2: Surface Waters on the Project Site

- 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\(d\)](#)¹¹; however, the MDE established [TMDLs](#)¹² 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 Wastewater Treatment Plant (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, 2019b). Additionally, Prince George's County created a Watershed Implementation Plan 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).

Stormwater

Stormwater¹³ is conveyed across the Project Site and within the ROI primarily to the west, southwest, and south, following topography (see the [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.

¹¹ 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).

¹² A TMDL is the maximum amount of a pollutant that a waterbody can receive while still meeting applicable WQS.

¹³ 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.

Wetlands

Wetlands¹⁴ 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 wetlands¹⁵, 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 groundwater¹⁶ aquifers flow to the southeast, although shallow groundwater on-site flows down-gradient to the southwest (USACE, 2020b; USACE, 2020e). An unconfined portion of the Patuxent aquifer, within the Patuxent Formation, recharges in the western portions of BARC (USACE, 2020e). 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](#) 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, 2020e). During the Phase II Environmental Site Assessment, 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)¹⁷ or otherwise consistent with natural background levels for the ROI (USACE, 2020e).

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 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).

¹⁴ 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.

¹⁵ Palustrine wetlands are non-tidal wetlands characterized by trees, shrubs, and emergent vegetation (Cowardin, Carter, Golet, & LaRoe, 1979).

¹⁶ Groundwater is water stored beneath the ground surface in soil and geological formations.

¹⁷ MCLs are standards set by the USEPA for drinking water quality under the Safe Drinking Water Act.

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. The new stream channel would consist of a natural stream system designed to match the existing stream flow and hydrologic function, including 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.

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**); this stream currently drains a roadside wetland (i.e., Wetland 8) underneath Powder Mill Road. Wetland 8 would also be filled during construction of the Proposed Action, and the design for this portion of the LOD would include a new drainage pattern that complies with applicable regulations and design requirements. In total, approximately 226 linear feet of stream within the Project site would be impacted, resulting in a **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, including modification or removal of existing stream channels, could increase on- and off-site soil erosion and sedimentation that could impact surface waters in the ROI (e.g., Beaverdam Creek). Compliance with NPDES permit requirements (e.g., use of silt fences and sediment traps), Maryland Tier II Antidegradation Review policies, and Maryland sediment and stormwater regulations, 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 discharged to the USDA's sanitary sewer system. Most of this discharge (approximately 114,000 gpd) would consist of sanitary wastewater and cooling tower blowdown, while approximately 6,000 gpd would be industrial wastewater. The USDA would provide Treasury with its current MDE-permitted effluent quality standards, and Treasury would be responsible for ensuring its wastewater discharges meet these standards.

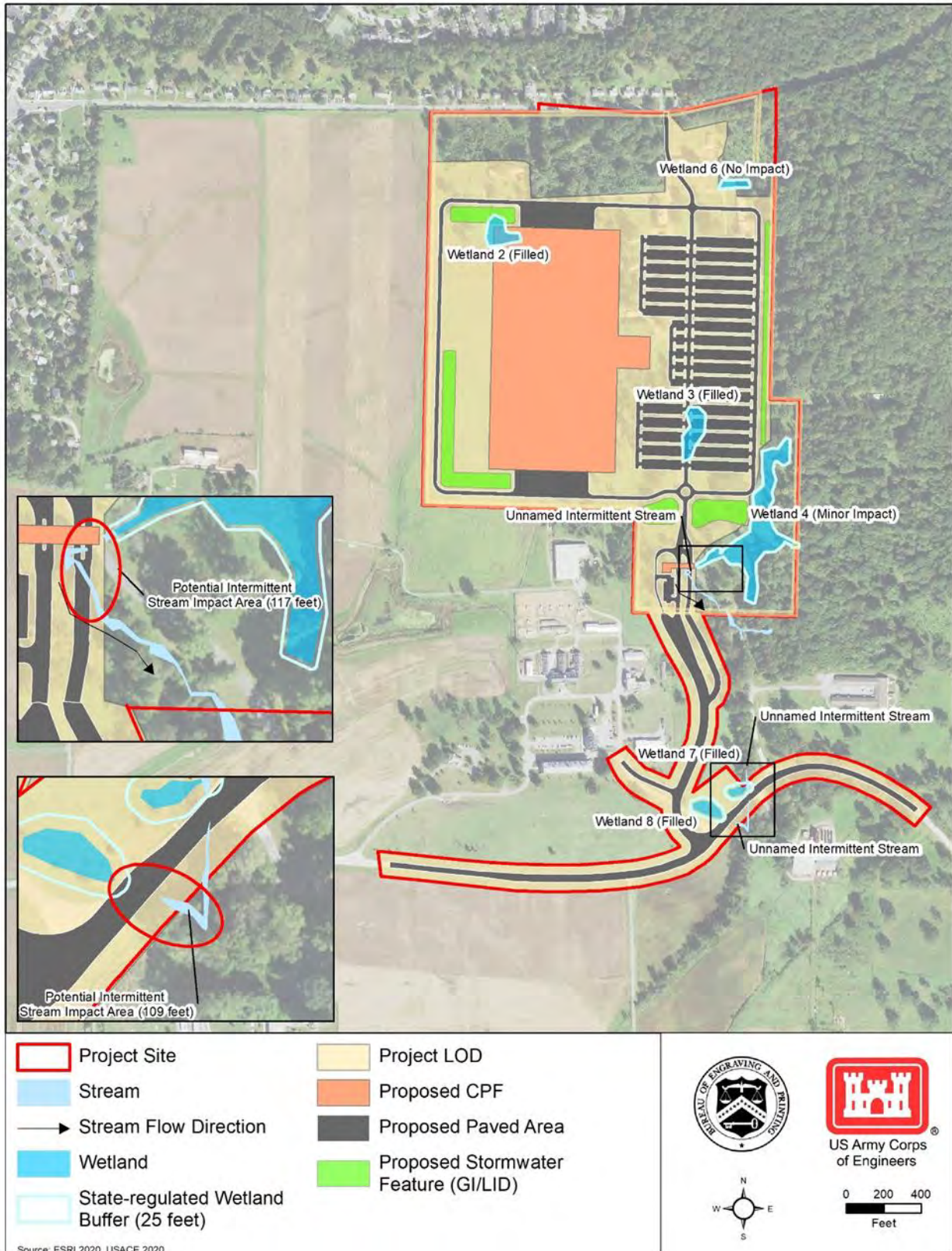


Figure 3.7-3: Potentially Impacted Water Bodies and Proposed Stormwater Infrastructure

The proposed CPF would produce four industrial wastewater streams that would contribute to the estimated 6,000 gpd of industrial discharge, which would be pretreated on-site prior to discharge to the USDA's sanitary sewer system: wiping solution wastewater, third waste stream, metal-containing waste streams, and miscellaneous printing plate processing unit stream. Please refer to the [Water Resources Technical Memorandum](#) for further information regarding these wastewater streams and treatment processes. For each wastewater stream, separated pollutants (e.g., ink solids, oil, grease, and metals) would be containerized and transported off-site to regulated waste facilities permitted to dispose of such materials.

At the DC Facility, Treasury conducts routine monitoring of its industrial wastewater discharges in accordance with an existing pretreatment permit from DC Water. Treasury has processes in place to monitor for contaminants potentially present in discharged effluent, and samples the effluent regularly according to applicable pollutant parameters. Treasury reports sampling results to DC Water biannually, and also annually conducts internal and third-party audits of the wastewater compliance program. Similar monitoring programs would be implemented at the proposed CPF.

Once Treasury's sanitary and industrial wastewater is discharged from the proposed CPF to the USDA's sanitary sewer system, it would be further treated to applicable standards at the BARC East WWTP and discharged to a tributary of Beaverdam Creek in accordance with BARC's existing WWTP discharge permit (MDE, 2016). In consultation with the USDA, Treasury has provided its historical wastewater quality records, and the USDA has indicated it has no concerns with the BARC East WWTP's ability to treat Treasury's wastewater to the levels required by its current permit (BEP, 2020b).

As described in **Section 3.11**, the BARC East WWTP has sufficient existing permitted capacity (i.e., up to 620,000 gpd) to treat both existing and planned future wastewater at BARC, as well as the anticipated volume of wastewater from the Proposed Action. The BARC East WWTP currently operates at only approximately 24 to 32 percent capacity on average, but would increase to approximately 44 to 52 percent capacity with implementation of the Proposed Action. The daily discharge of Treasury's wastewater volume would increase downstream surface water flow and total effluent loads relative to existing conditions.

However, downstream water flow and quality would not be substantially affected, as discharge would meet MDE-required thresholds, remain below the BARC East WWTP's permitted capacity, and be within Beaverdam Creek's remaining assimilative capacity. The WWTP would continue to comply with existing MDE permit requirements and established TMDLs for downstream waterbodies, and would not require any modifications to accommodate the Proposed Action's wastewater. Therefore, operation of the Proposed Action could result in **less-than-significant adverse impacts** on the volume and quality 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, operation of the Proposed Action would have **no impacts** 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, Maryland Tier II Antidegradation Review policies, and Maryland sediment and stormwater regulations 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 up to 29.4 acres for a total of up to 46.7 acres, or up to 38.2 percent of the Project Site. This potential increase in impervious surfaces is a conservatively high estimate and does not account for the inclusion of GI/LID elements, such as green roofs, permeable pavement, and reinforced turf, that would reduce impervious surfaces; these design details have not yet been finalized. These GI/LID measures would reduce the amount of impervious surface cover proposed. The actual amount of post-construction impervious surfaces on the Project Site may be substantially less than that estimated above.

Increases in impervious surfaces can result in proportional increases in stormwater runoff volumes discharging from the Project Site to receiving waterbodies, with corresponding increases in concentrations of pollutants and sediments. Treasury would, however, properly design, construct, and maintain GI/LID stormwater infrastructure on the Project Site (see **Figure 3.7-3** for a conceptual representation) 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. Proposed GI/LID features would manage and capture stormwater, reduce runoff volumes, and ensure that peak storm flow rates replicate pre-development flow rates. In addition, certain GI/LID features would help treat stormwater runoff by filtering out pollutants (e.g., sediment and petroleum leaking onto roads/parking lots). Stormwater control BMPs identified under EO 13508 would also be integrated into the 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 Final 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 may 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](#)). Treasury has submitted its FCD to the MDNR for review and concurrence. 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, with the exception of the crossing of the south security fence.
- Design the Preferred Alternative to fully avoid Wetland 7 and/or Wetland 8 during construction (and operation) activities (e.g., by adjusting proposed entrance road and Powder Mill Road improvements).
- If not already required through the federal and/or state wetland permitting processes, mitigate wetland fills at a 1:1 ratio through on-site or off-site replacement, purchase of wetland mitigation bank credits, or payment of in-lieu fee.

If Treasury chooses to implement these recommended mitigation measures, potential fill/diversion of surface waters would be reduced from 226 linear feet to 109 linear feet (i.e., a reduction of 117 linear feet), thus mitigating this potential significant adverse impact to a **less-than-significant** level. Similarly, potential fill of wetlands would be reduced from 0.94 acre to 0.76 acre (i.e., a reduction of 0.18 acre), further reducing this potential **less-than-significant adverse** impact.

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.

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.

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 (<i>Quercus spp.</i>), Red Maple (<i>Acer rubrum</i>), Sweet gum (<i>Liquidambar styraciflua</i>)	17.2	206.7	25.5
Agriculture	Rotation of Corn (<i>Zea mays</i>), Soybean (<i>Glycine max</i>), 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 (<i>Juncus effusus</i>) and reed canary grass (<i>Phalaris arundinacea</i>)	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.

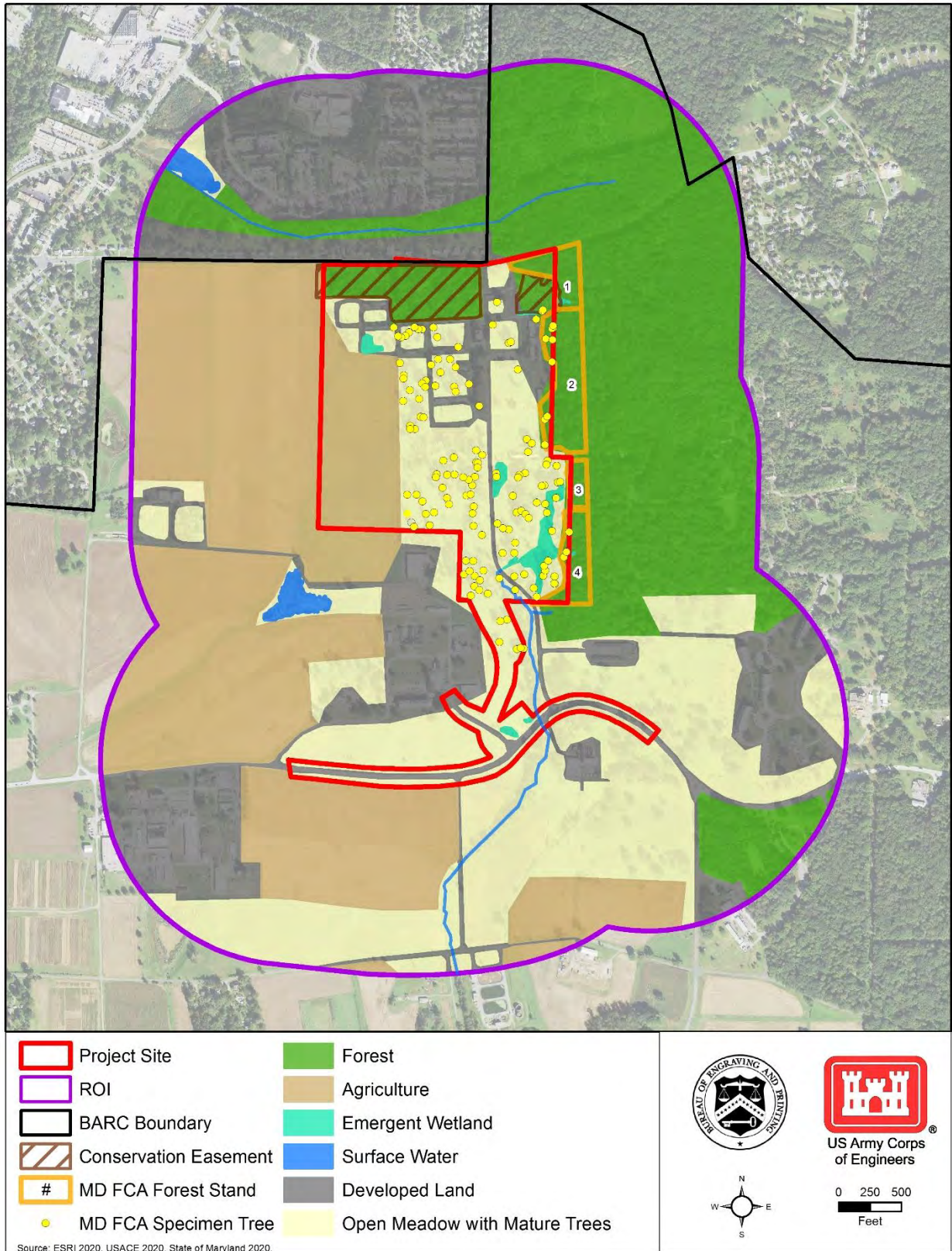


Figure 3.8-1: Existing Features in the Biological Resources ROI

In accordance with the [MFCA](#), Treasury conducted a [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 easements¹⁸. The MDNR approved Treasury's FSD via letter dated March 22, 2021 (see the [Biological Resources Technical Memorandum](#)).

The Project Site also contains forest edge habitat; this ecotone is characterized by the transition of a large forested area to the east of the Project Site to open meadows with mature trees and scattered wetlands on the Project Site. Edge habitats, such as the one present on the Project Site, often support greater biodiversity than homogenous habitats due to their greater variation. The generally vegetated nature of the Project Site, particularly with open meadows and forests, also enables the Project Site to sequester some carbon.

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, as well as the transition area (i.e., edge habitat) between these vegetative communities, as described above. 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*). These nest boxes are known to produce successful fledglings. 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's (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 known 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.

Bald Eagles

Bald eagles nest on forest edges in large trees, often near farm fields or bodies of water. In Maryland, the bald eagle (*Haliaeetus leucocephalus*) mating season begins in mid-December, with a clutch of one to three eggs laid by March. Hatching typically occurs in April, after which eagles remain in the nest for about 12 weeks. Juvenile eagles learn to fly in June, and by August can hunt and fish on their own. Bald eagles forage over large bodies of water, such as rivers or lakes, as their diet consists mainly of fish; however, they

¹⁸ 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, 2019e).

are also known to forage in nearby terrestrial areas for small mammals, birds, reptiles, and carrion (MDNR, 2021).

No bald eagle nests exist within the ROI. The closest known bald eagle nest to the Project Site is located approximately 0.6 mile south of the Project Site along Beaverdam Creek (MBCP, 2020). This nest is popular among local bird watchers and is known to produce successful eaglets.

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). BARC is a popular site among local bird watchers, who have identified over 200 species of migratory birds on BARC (see [eBird](#) for a list of bird sightings on BARC). Treasury's proposed parcel is a popular location for bird watching within BARC due to its variety of habitats.

The USFWS identifies 12 [Birds of Conservation Concern](#) (BCCs¹⁹) with the potential to occur on the Project Site (USFWS, 2020b). All 12 BCCs 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. No or limited human activities would occur at the Project Site. Therefore, there would be **no effect** on biological resources.

3.8.2.2 Preferred Alternative

Vegetation

Construction

The construction LOD of the Proposed Action includes approximately 100.3 acres, or 82.1 percent, of the Project Site. Under the Preferred Alternative, this LOD would be converted to developed land, resulting in removal of the existing vegetation communities (i.e., approximately 83.6 acres of vegetation, with the balance of the acreage already developed) and habitat 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.

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 (including minor disturbance to existing forest conservation easements) in the ROI would remain **less than significant** due to proactive compliance with existing laws and policies to reduce vegetation removal. Construction would have **no impact** on invasive species, as areas proposed to be disturbed by construction would be landscaped with native species according to Treasury's design.

¹⁹ 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).

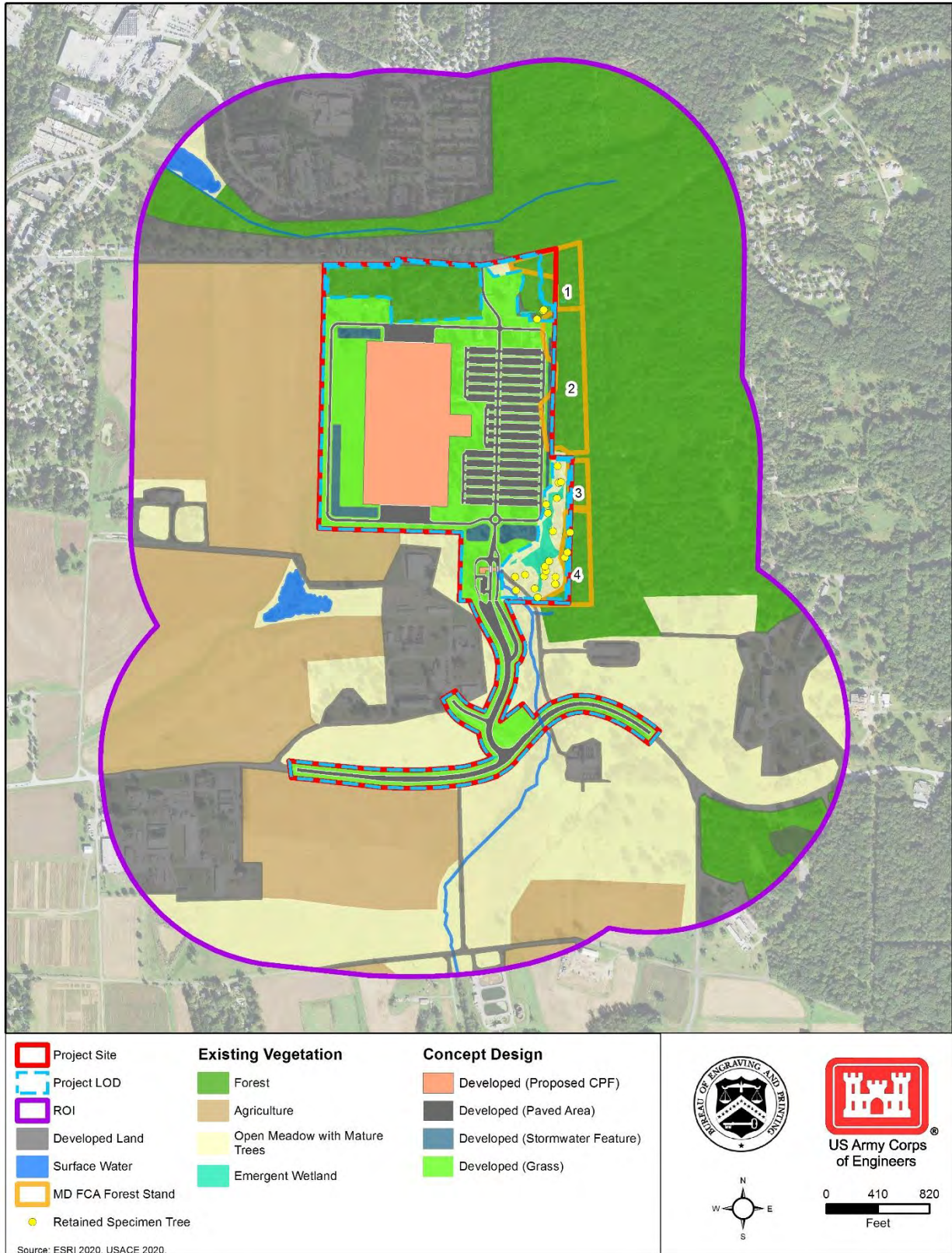


Figure 3.8-2: Post-Construction Biological Resources

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

Operation

Treasury would revegetate approximately 47.3 acres of the 100.3-acre LOD disturbed during construction with native plant species in accordance with landscape plans developed during the design phase. Revegetated areas would have minimal value as wildlife habitat, but would be maintained to prevent establishment of invasive species and to avoid soil erosion. No natural vegetation communities would re-establish within the operational footprint (i.e., within the construction LOD). While existing on-site meadows would largely be removed, long-term carbon sequestration functions would be replaced in part by the replacement trees and other native vegetation planted on-site in accordance with the FCP and Planting Plan. 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 remove approximately 83.6 acres of existing, vegetated wildlife habitat within the Project Site, including edge habitats (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 is bordered on three sides by residential development, active cropland, and active BARC facilities, and 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.

Treasury would minimize the potential for on-site and downstream impacts to aquatic wildlife and their habitats through compliance with the [CWA](#), [Section 438 of the EISA](#), and [EO 13508](#). Similar to terrestrial wildlife, less mobile species inhabiting on-site wetlands or streams that would be impacted/filled by the Proposed Action could be killed. No downstream effects would be anticipated from fill of isolated wetlands. Downstream effects associated with on-site WOUS impacts could include sedimentation and altered water flows from impacts to the on-site intermittent streams and jurisdictional wetlands; these impacts would be minimized through compliance with the site-specific ESCP and NPDES BMPs (see **Table 2.2-1**). The existing intermittent stream along Poultry Road to be diverted would remain in its existing condition until the

new natural channel has been constructed, at which point the water flow would be transitioned to the new channel. This would minimize potential sedimentation or altered water flows during the construction process.

Adverse water quality impacts to downstream waterbodies from the Proposed Action could include increased water flows, turbidity, and effluent loading associated with increased wastewater relative to existing conditions; however, these increases would remain well within the BARC East WWTP's permitted capacity (see **Section 3.7.2.2**), which was established in accordance with the Anacostia River and Chesapeake Bay TMDLs, and be anticipated to have minimal impact on the biological integrity of downstream waterbodies.

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. Measures to reduce operational noise and light impacts, including consideration of the IDA's [five principles for responsible outdoor lighting](#) in the Proposed Action design (IDA, n.d.), would minimize these impacts. 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**. Potential adverse impacts of site lighting to migrating birds traveling over the Project Site would be **negligible** due to the site's close proximity to an established, generally well-lit industrial and commercial corridor along US Route 1; the Proposed Action would not substantially affect the amount of light visible from the air on a landscape level.

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.

Special Status Species – Bald Eagles

Construction

In consultation with the USFWS regarding the Proposed Action's potential to disturb the bald eagle nest located 0.6 mile south of the Project Site, Treasury completed the USFWS's recommended Northeast Bald Eagle Project Screening Form (see the [Biological Resources Technical Memorandum](#)). Based on the types of activities included in the Proposed Action, as well as the potential visibility of the Proposed Action from the bald eagle nest, the Screening Form identified three avoidance measures for Treasury to implement as part of its Proposed Action (see **Table 2.2-1**). These measures include, in part, a distance buffer of 660 feet; the bald eagle nest is well outside of this recommended buffer (i.e., 0.6 miles or 3,170 feet). Additionally, as identified in **Table 2.2-1**, Treasury intends to retain existing landscape buffers with appropriate-height vegetation around the periphery of Treasury's proposed parcel, which would help visually screen the Proposed Action from the existing bald eagle nest.

Bald eagles forage primarily over or near waterbodies. The Project Site, bounded to the west by active agriculture and to the north by residential development, is not between the eagle nest and Beaverdam Creek. The USFWS concurred that the Proposed Action would be unlikely to affect the bald eagles' ability to forage (see the [Biological Resources Technical Memorandum](#)). Although local bird watchers have observed bald eagles foraging on or near the Project Site, bald eagles would likely avoid the Project Site during construction; therefore, there would be a **less-than-significant adverse impact** on bald eagles.

Operation

Potential impacts on bald eagles from operation of the Proposed Action would be similar to those described above for wildlife. Noise and light generated from proposed CPF operations would create minor disturbances to bald eagles that approach Treasury's proposed parcel, potentially resulting in a **negligible impact**. Noise and light would attenuate to ambient levels at approximately 800 feet from the proposed CPF, and therefore would not impact the nest to the south of the Project Site. Bald eagles would likely avoid the proposed CPF and acclimate to its operation over time. Retained landscape buffers with appropriate-height vegetation on-site would continue to help visually screen the Project Site from the nest.

Special Status Species – 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. Most birds would likely avoid the Project Site or relocate to nearby habitat areas on BARC, in the ROI, or regionally, although they would experience loss of approximately 63 acres of non-agricultural habitat (i.e., primarily open meadows with mature trees). 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 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).
- As described in **Section 3.3.3**, establish landscape buffers, including appropriate-height vegetation, on all sides of Treasury’s proposed parcel to minimize views from off-site areas, to the extent practicable while still meeting site security requirements. This mitigation measure would further reduce potential adverse impacts to the bald eagle nest located approximately 0.6 mile south of the Project Site.
- Construct and maintain the proposed stormwater management features to provide as much wildlife habitat value as possible.
- Develop the landscape design plan to revegetate Treasury’s proposed parcel with native vegetation and micro-habitats (e.g., maintained meadows and additional reforestation) such that it maximizes wildlife values.

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).²⁰ The archaeological APE is the Project Site. The architectural history APE is two part: the Project Site (i.e., where buildings and structures could 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. Please note that the dashed line along portions of the ROI in **Figure 3.9-1** indicates “filtered” views, such as through trees.

²⁰ 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 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](#)).

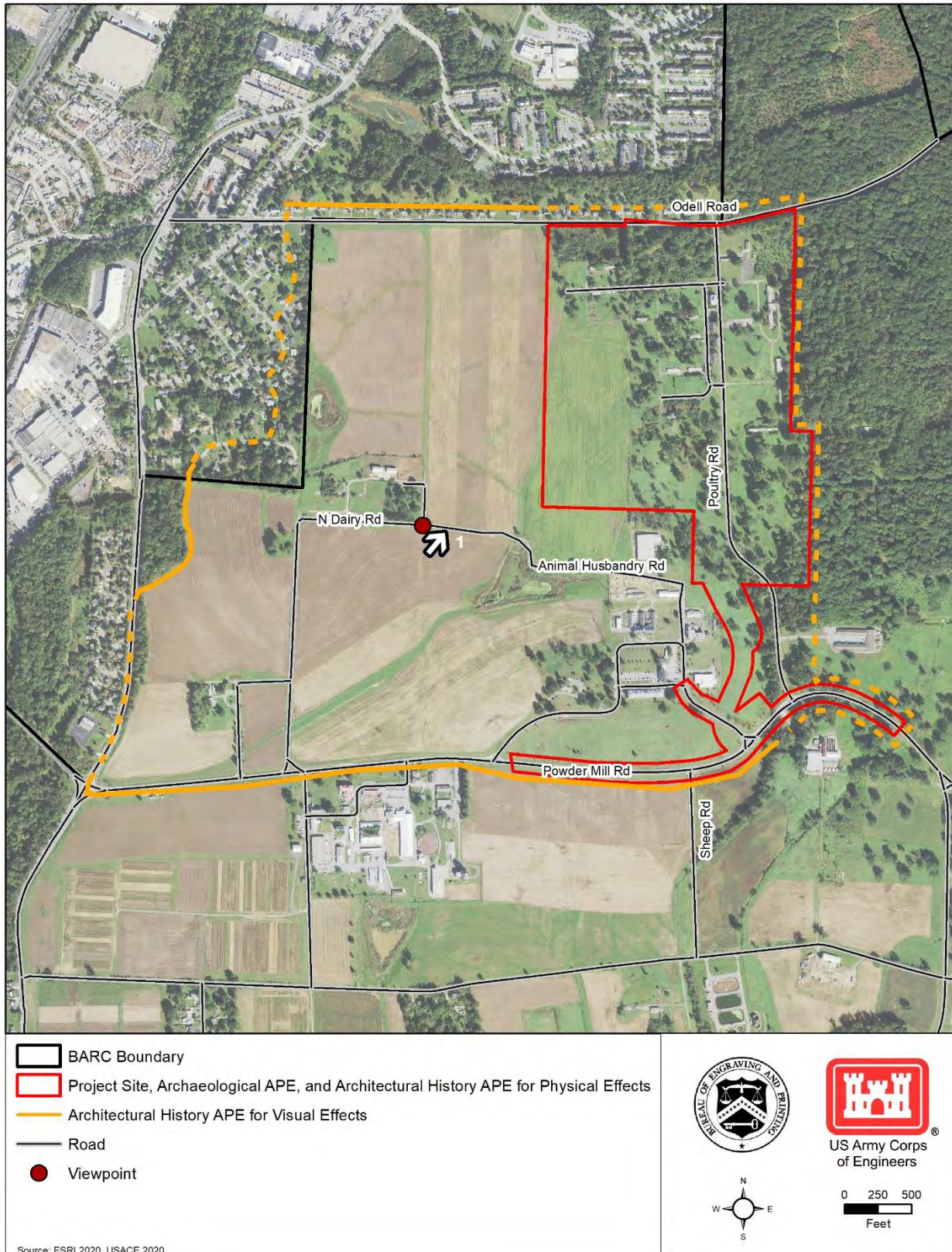


Figure 3.9-1: Cultural Resources ROI

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 assess 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. Please refer to the [Cultural Resources Technical Memorandum](#) for a record of Section 106 consultation. Treasury's MOA developed with consulting parties can be found on the project website [here](#).

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, and the MHT concurred, that both of these sites are not eligible for the NRHP. Treasury would implement full avoidance of the third potentially eligible site, so no further evaluation is required.

While there is one known paleontological site at BARC, no paleontological sites are known to exist at the Project Site or have been discovered during extensive past BARC operations and ground disturbances at the Project Site (i.e., during construction of the poultry research facilities). Treasury's Phase I and Phase II invasive archaeological surveys also did not discover any fossils or indicate that there could be a high probability for paleontological deposits at the Project Site.

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).

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.

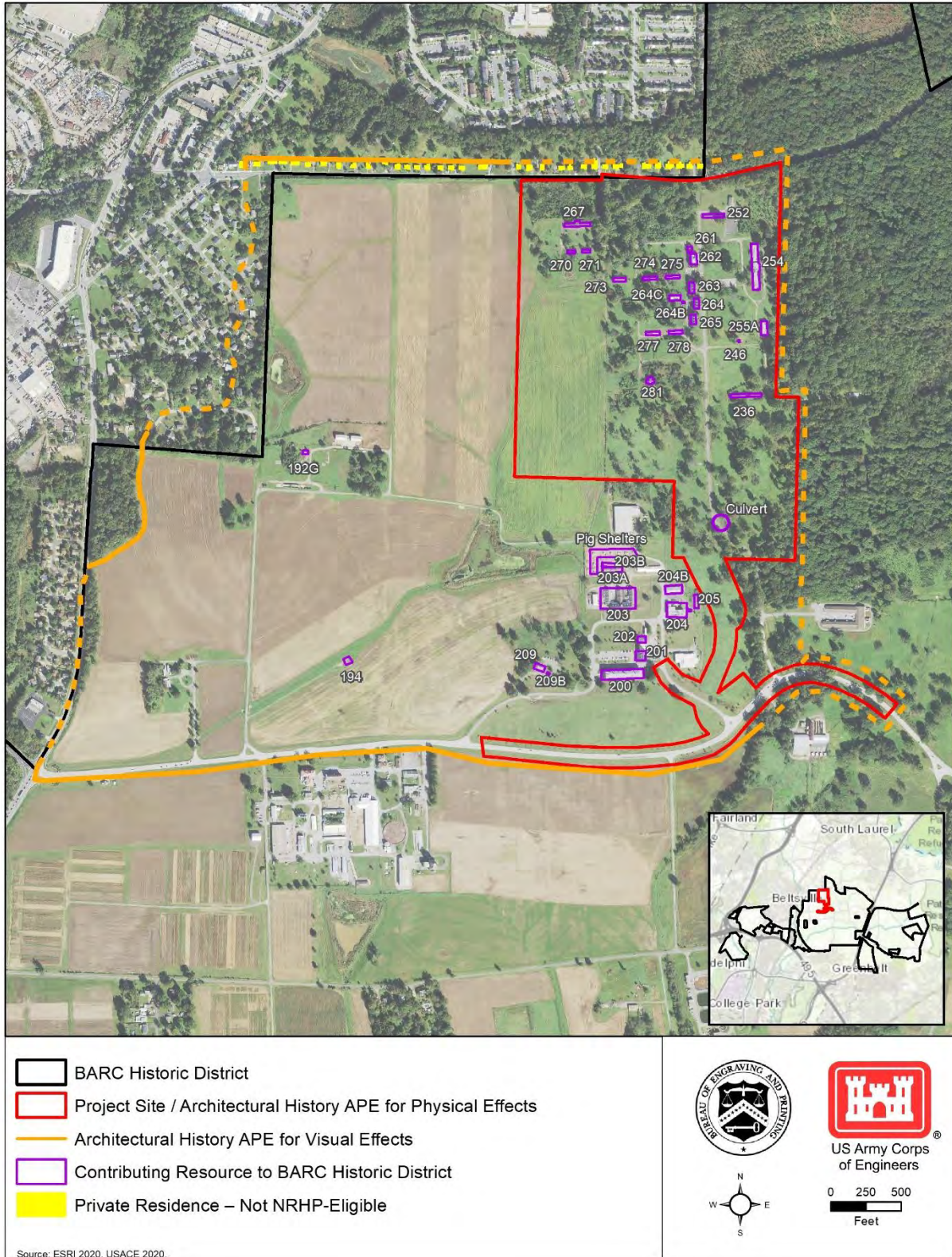


Figure 3.9-2: Architectural Resources in the Architectural History APEs for Physical Effects and Visual Effects

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. There would be no impact to any paleontological resources that might exist on the site.

Architectural Resources

The No Action Alternative would have a **less-than-significant adverse impact** on the BARC Historic District in the architectural history APE due to deterioration. Contributing buildings and structures on the Project Site (i.e., the architectural history APE for physical effects) that have been vacant for years are in disrepair and may continue to deteriorate under the No Action Alternative. The USDA, however, as a federal agency, is responsible for complying with the NHPA. Therefore, under the No Action Alternative, the USDA would coordinate with the MHT and any consulting parties to identify methods to avoid, minimize, and/or mitigate deterioration of the on-site historic resources as needed to maintain the BARC Historic District in compliance with the NHPA.

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. Due to the absence of paleontological deposits at the Project Site, the Preferred Alternative would likely have **no impact** on paleontological resources. However, the Preferred Alternative could have **less-than-significant adverse impacts** on previously unknown archaeological sites, including unknown paleontological 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 historic property (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. Please see also the mitigation measures identified in **Section 3.3.3**.

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).

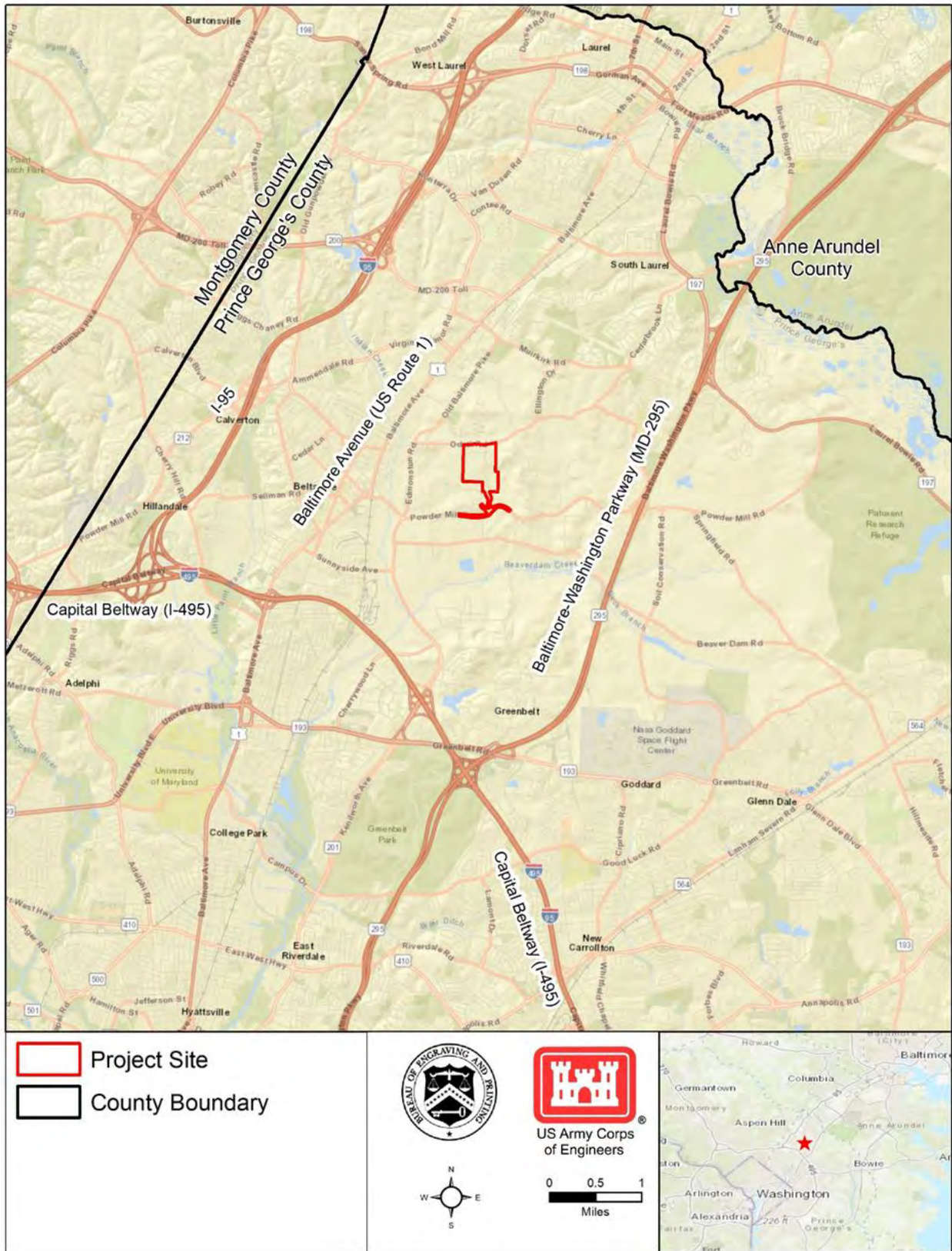


Figure 3.10-1: Regional ROI for Traffic and Transportation

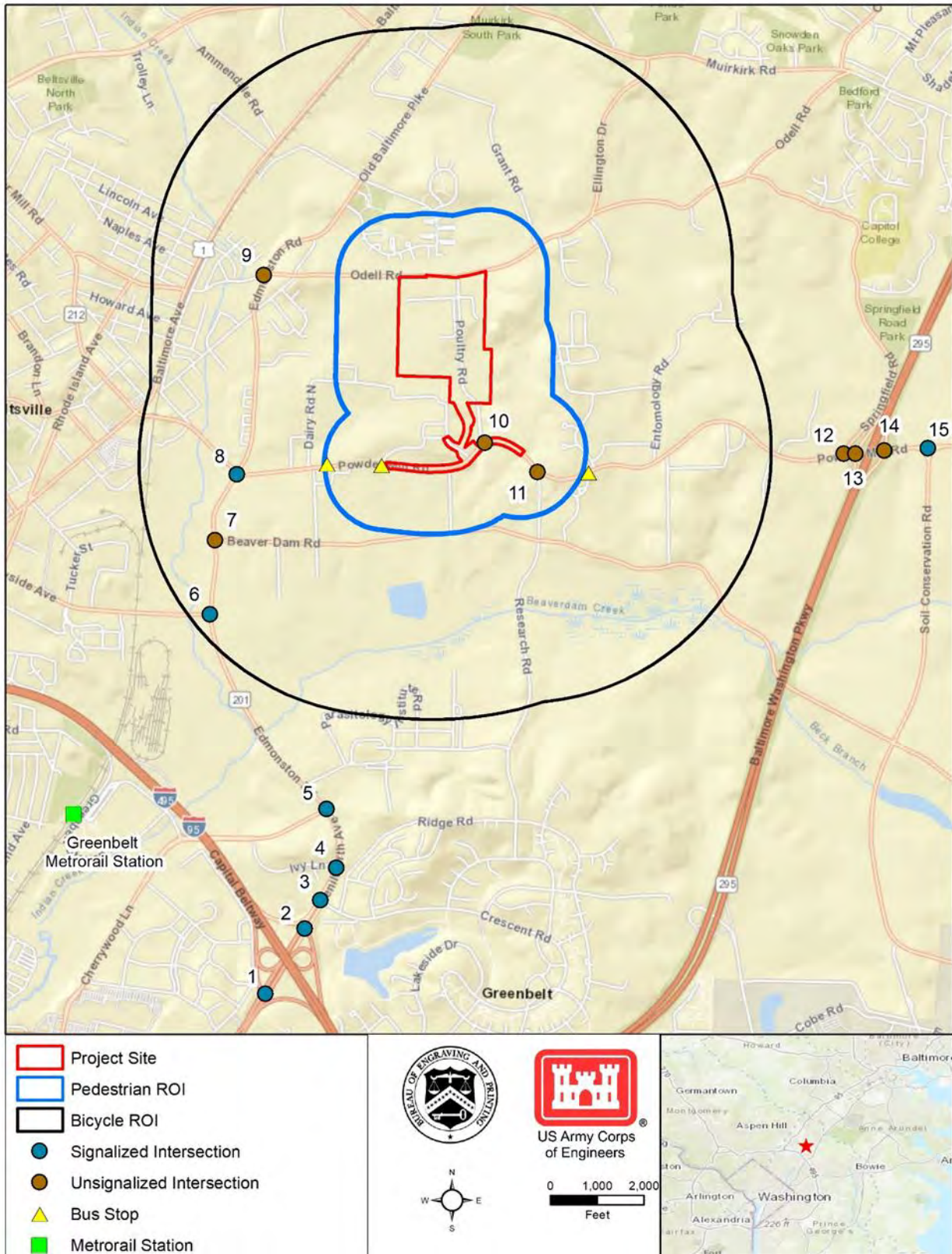


Figure 3.10-2: Local ROI for Traffic and Transportation

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

Source: (BEP, 2020a)

3.10.1.2 Applicable Guidance

Treasury would comply with all federal, state, and local laws and regulations relating to traffic and transportation while constructing and operating the Proposed Action. Please refer to the [Traffic and Transportation Technical Memorandum](#) for a complete list of applicable laws and regulations relevant to traffic and transportation.

3.10.1.3 Existing Conditions

BEP Employee Home Locations and Commuting Methods

Treasury surveyed existing DC Facility employees in September 2019 regarding their home locations relative to the proposed CPF. Of the respondents, approximately 34 percent reside to the south of the Project Site, approximately 28 percent reside to the west, approximately 16 percent reside to the east, and approximately 14 percent reside to the north (BEP, 2020a).²¹

Treasury also estimated the commuting methods of employees commuting to the DC Facility under existing conditions. Treasury identified the following approximate modal split: 30 percent drive single-occupant vehicles (SOVs); 7 percent carpool with other BEP employees; 44 percent use public transit, such as the Metrobus or Metrorail; and approximately 19 percent either use an alternate mode of transport, such as walking or biking, or also drive SOVs.

²¹ The remaining 8 percent of existing Treasury staff did not answer as they would be dependent on public transit.

Vehicles (SOVs and Trucks)

Treasury and local planning authorities determined that the existing AM and PM peak hours in the local 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 for most of the AM and PM peak hour periods. Most employees at the proposed CPF would work the day shift from 6:30 a.m. to 3:00 p.m.,²² with anticipated travel occurring between the hours from 6:00 to 7:00 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 LOS²³ 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 shoulder²⁴ between Edmonston Road and the Baltimore-Washington Parkway that provides space for, and is commonly used by, bicyclists.

²² Work hours may be altered, as needed, to meet production demands.

²³ 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.

²⁴ Federal Highway Administration guidelines state bicycle striped lanes should be 5 feet wide (FHWA, 2015).

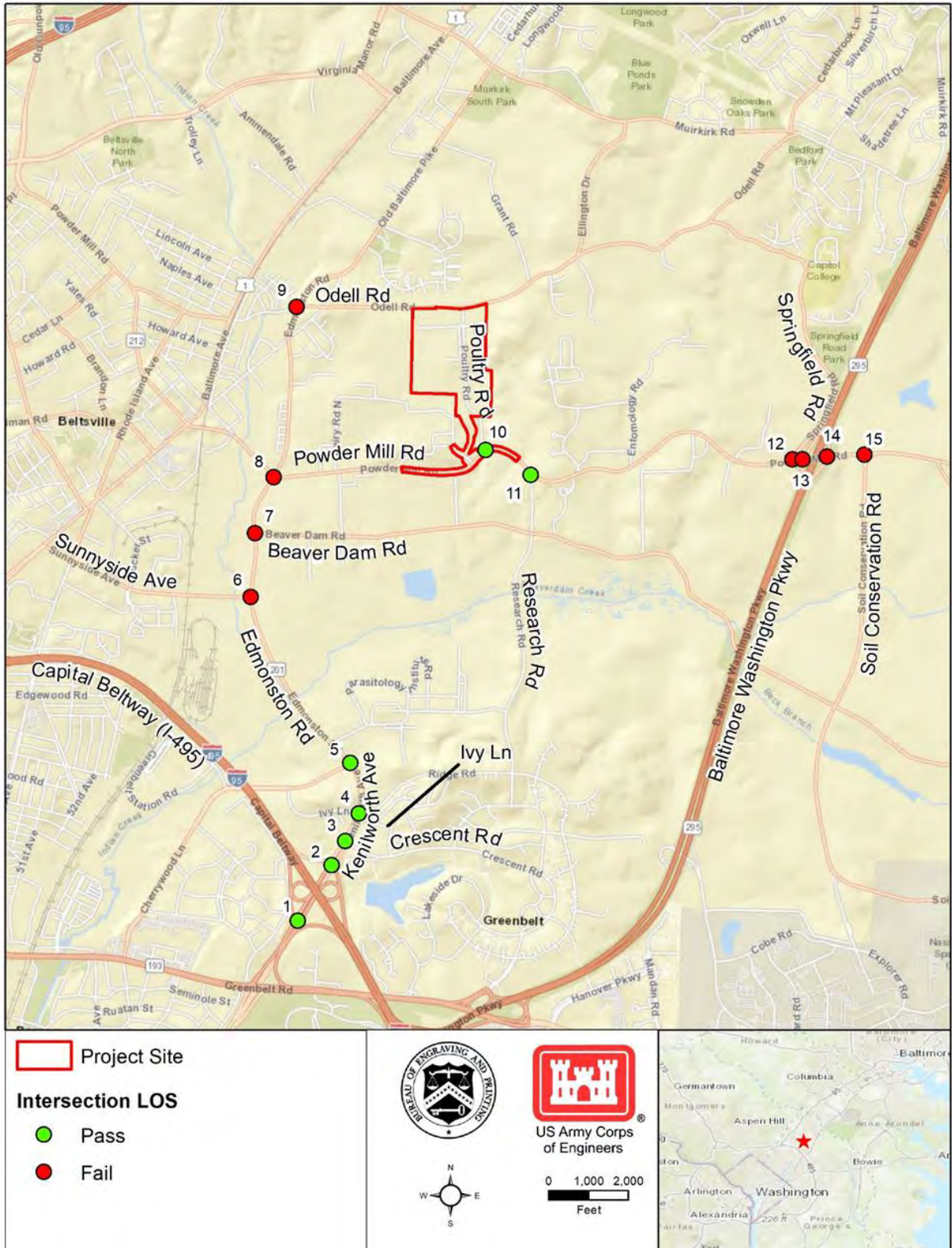


Figure 3.10-3: LOS at the 15 Studied Intersections in the Local ROI under Existing Conditions

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). In 2019, the overall Metrorail system averaged approximately 626,000 daily entries (i.e., trips) (WMATA, 2021).

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.

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 carsharing²⁵ 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.

²⁵ 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.

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.

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 of the proposed Powder Mill Road modifications, there would be temporary closures of the 3-foot to 6-foot striped bicycle shoulder on Powder Mill Road within the Project Site. 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.

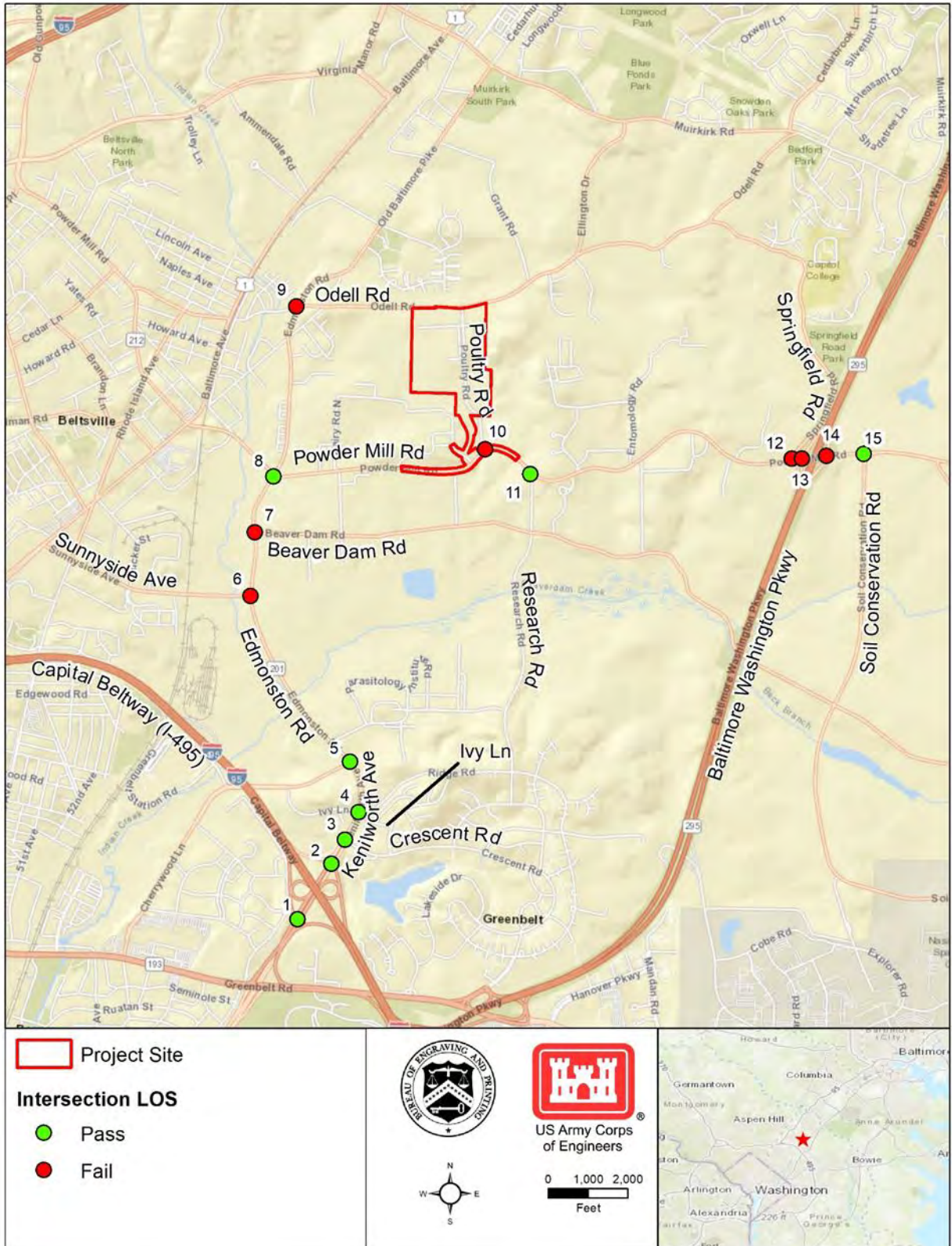


Figure 3.10-4: LOS at the 15 Studied Intersections in Local ROI under the No Action Alternative

Operation

Operation of the proposed CPF would not result in any permanent public road closures. Poultry Road, a private BARC road which is currently closed at its intersection with Odell Road, would be demolished within Treasury's proposed parcel, but remain accessible from Powder Mill Road for BARC operations.

Vehicles (SOVs and Trucks) – Regional ROI

SOV traffic in the regional ROI would increase under the Preferred Alternative due to the decreased accessibility of the proposed CPF via public transit compared to the DC Facility. The percentage of employees who would commute via SOV would increase from between 30 and 59 percent currently to approximately 88 percent once the proposed CPF is fully operational. 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.

Treasury currently provides commuter incentives to encourage employees to carpool or use public transit; these incentives would continue under the Preferred Alternative as a means of reducing SOV trips. Treasury would also develop a Transportation Management Plan, which would include an annual review of the commuting methods of its personnel and provisions to encourage alternate travel options. Overall, potential adverse impacts on roadways in the regional ROI from an increase in the number of SOVs from commuters would have a ***less-than-significant adverse impact***.

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***. Additionally, there could be a slight decrease in truck trips in the regional ROI as trips to and from the Landover facility would be eliminated.

Vehicles (SOVs and Trucks) – Local ROI

Increased traffic in the local ROI is primarily captured in the results of the LOS and queue length analyses of the primary commuting hours for Treasury employees, discussed below. There would also be, however, approximately 130 to 135 additional trips from administrative CPF employees during the local ROI's AM and PM peak hours.

Visitors to the proposed CPF would generate minor additional traffic. Treasury anticipates allotting approximately 30 parking spaces for public visitation, thereby limiting the number of public SOVs accessing the facility at one time. Treasury would manage visitation by requiring guests to register and reserve tickets in advance. Currently, the DC Facility accommodates approximately 200,000 guests per year; at this time, Treasury anticipates accommodating approximately 45,000 guests per year at the proposed CPF, which would likely supplement, not replace, the public features at the DC Facility. Visitors would arrive throughout the middle of the day (e.g., 9:00 a.m. to 3:00 p.m.) to generally avoid both the peak hours and primary commuting hours in the local ROI.

The minor increase in traffic from administrative CPF employees during the most congested periods of the day and minimal additional traffic during the middle of the day, as described above, would result in a ***less-than-significant adverse impact*** to local traffic.

Increases in the amount of traffic and the number of SOVs in the local ROI could result in commuters seeking alternate routes through neighborhoods or along back roads in order to avoid congestion along main roadways. Such "cut-through" traffic could pose a hazard to public safety, especially pedestrian safety. Treasury anticipates that most employees would utilize the main roads in the local ROI as they would likely still be the most efficient routes; however, the potential increase in traffic on residential or back roads, and associated public safety risks, would be a potential ***less-than-significant adverse impact***. Implementation

of the intersection mitigation measures identified in **Section 3.10.3** would ensure that the main roads remain the most efficient access routes to the CPF and effectively eliminate this potential adverse impact.

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.

Vehicles (SOVs and Trucks) – LOS and Queue Lengths

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**.

Vehicles (SOVs and Trucks) – Parking

The proposed CPF would have a surface parking lot with approximately 1,234 parking spaces, which would be sufficient for both employees and visitors at any given time. This number exceeds federal guidelines established in the NCPC parking policy (NCPC, 2016), but the additional parking spaces would be required to accommodate production shift times and the lack of public transit. As most employees would commute via SOV, Treasury would include enough parking spaces for production staff at a 1:1 ratio to ensure that personnel are able to arrive on time.

Parking for administrative staff would be provided at a 1:2 ratio, in accordance with the NCPC policy, as these personnel have greater flexibility in their arrival times (BEP, 2019b).

Most parking spaces would be beyond a security checkpoint and would therefore not be accessible to the public; however, a limited number would be outside the security perimeter to accommodate visitors with pre-scheduled reservations. Treasury initially considered multi-level parking to reduce the development footprint, but determined this would not be feasible due to ISC Level IV security requirements. 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 **less-than-significant 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.

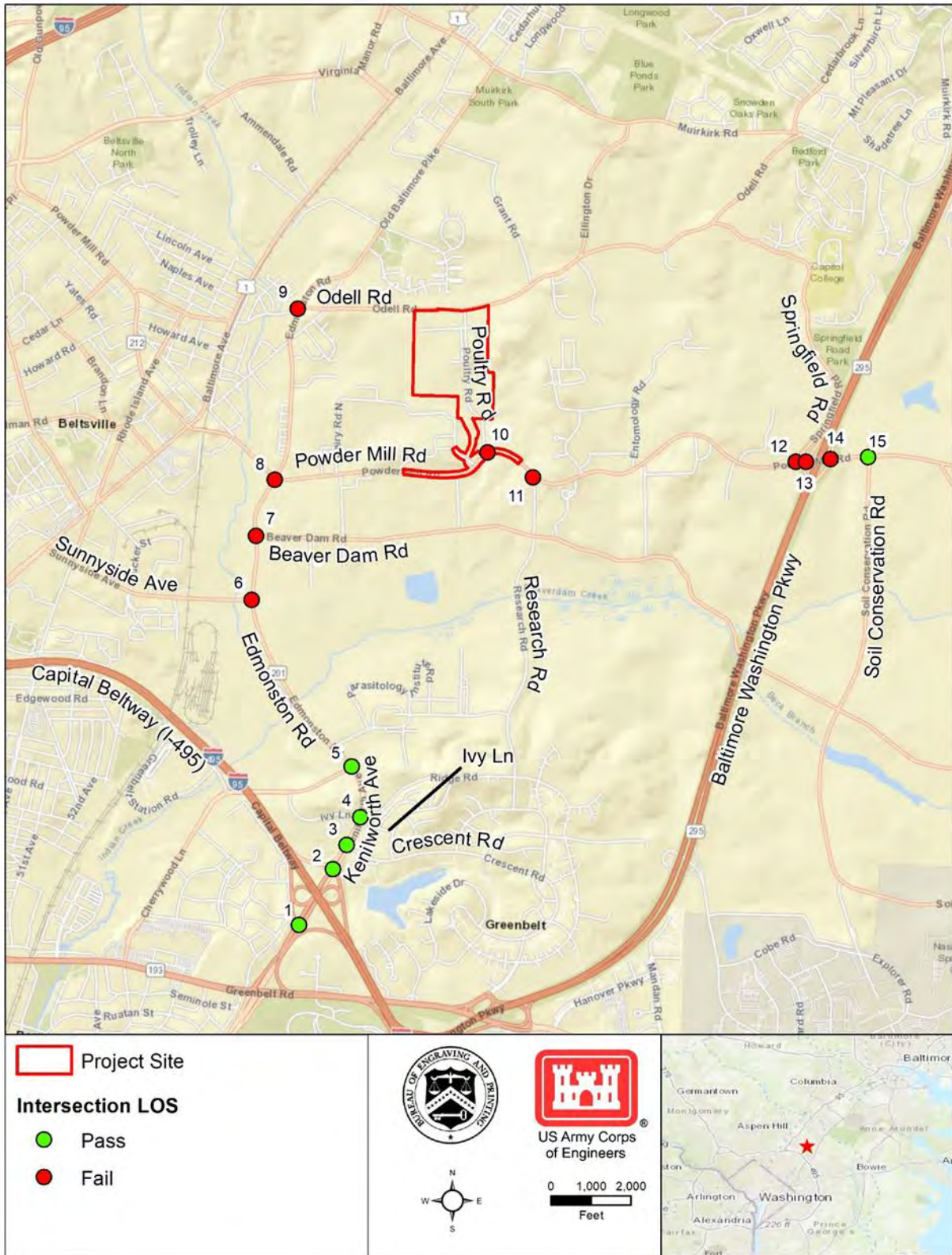


Figure 3.10-5: LOS at the 15 Studied Intersections in Local ROI under the Preferred Alternative

Public Transit

Treasury anticipates only 9 percent (i.e., approximately 100) of CPF employees would take public transit to work at the proposed CPF, compared to 44 percent under existing conditions, 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. Public transit ridership would therefore decrease by approximately 400 employees, or 800 daily entries. For those employees who continue to use public transit, however, transit trips would shift to use primarily the Greenbelt Metrorail Station and the Metrobus 87 route along Powder Mill Road. Any increase in Metrorail or Metrobus ridership through the Greenbelt Metrorail Station and Metrobus 87 route 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. WMATA could also experience adverse impacts from potential reductions in revenue associated with the lost Metrorail ridership, but this change would be a reduction of approximately 0.1 percent of daily entries and thus **negligible** relative to overall Metrorail use in Washington, D.C.

3.10.3 Mitigation Measures

Treasury should propose, consult with public stakeholders, and ultimately 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.

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, as ultimate implementation would be contingent upon receiving approval from appropriate stakeholders. Effective mitigation designs would reduce adverse impacts to less-than-significant levels for all affected intersections. As discussed in **Section 2.4.2**, if Treasury selects the Preferred Alternative and recommended traffic mitigation measures for implementation in the ROD, Treasury would tier additional NEPA analysis off this FEIS to analyze the potential impacts of traffic mitigation measures once the associated designs have progressed to the point that Treasury can identify reasonable potential LODs and conduct a meaningful environmental analysis for all relevant resource areas.

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**:

- Propose, consult with public stakeholders, and ultimately implement mitigation measures for Intersection 7 as detailed in the [Transportation Impact Study](#) to minimize safety hazards at this

intersection caused by gap acceptance issues. Ultimate implementation would be contingent upon receiving approval from appropriate stakeholders.

- In consultation with local planning authorities, implement traffic-calming devices (e.g., speed bumps) and/or reduce speed limits 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 on-site pedestrian and/or bicycle amenities into the Preferred Alternative during the design process.
- Consult with WMATA regarding the opportunity to adjust Metrobus routes to serve the proposed CPF more effectively, and, if applicable, to install bus stop shelters, 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 [DoD UFC 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**).

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.

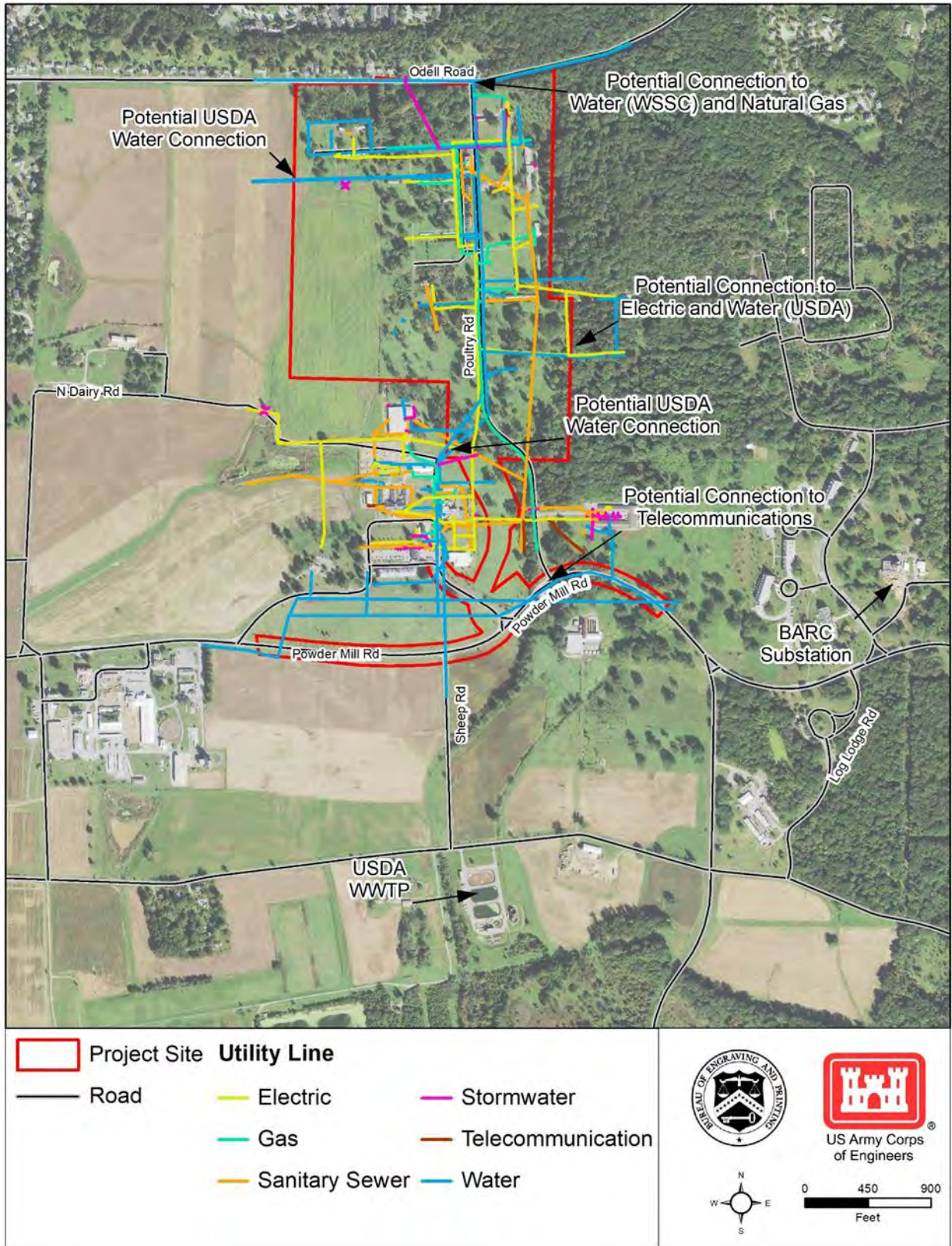


Figure 3.11-1: Existing Utility Infrastructure and Potential Connection Points in the ROI

- 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 BARC East WWTP located approximately 0.3 miles south of the Project Site, which has a current average peak discharge of between 150,000 and 200,000 gpd, and is permitted to treat and discharge up to 620,000 gpd. 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. No operational activities would occur at the Project Site that would require utilities. As there would be no change to existing utilities at the Project Site, 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. Water requirements may be reduced through rainwater harvesting, non-potable greywater reuse, wastewater recycling, and low-flow plumbing features, currently being considered as part of the design process (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). Treasury's stormwater management strategy would account for stormwater that currently drains to the sanitary sewer system from the Project Site (i.e., due to existing stormwater inflow/infiltration issues) that would be eliminated by the Proposed Action. Wastewater would be treated by the USDA-owned WWTP to required water quality standards. The WWTP has sufficient permitted capacity remaining to treat Treasury's estimated 120,000 gpd of discharge while still meeting its permit conditions and MDE-permitted capacity. No modifications to the WWTP or its operating permit are currently anticipated.

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 socioeconomic 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.

Note: Treasury revised the following EJ analysis following publication of the DEIS. Treasury originally prepared the socioeconomic and EJ analyses using the US Census Bureau's 2018 American Community Survey (ACS) dataset, which was the best available data at that time.

That dataset, however, did not contain data at the block group level, which restricted Treasury's ability to consider potential EJ impacts to individual communities, at the block group level, near the Project Site within the EJ ROI. Since that time, new and more refined data for the EJ ROI has been published, allowing Treasury to conduct a more refined analysis.

The updated analysis, using these more current and specific data, is provided below. In summary, these new, more refined data did not alter the conclusions of the previous analysis but did provide the opportunity to provide confirmation of that analysis, based on the more specific data.

Please refer to the [Socioeconomics and Environmental Justice Technical Memorandum](#) for further information.

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).

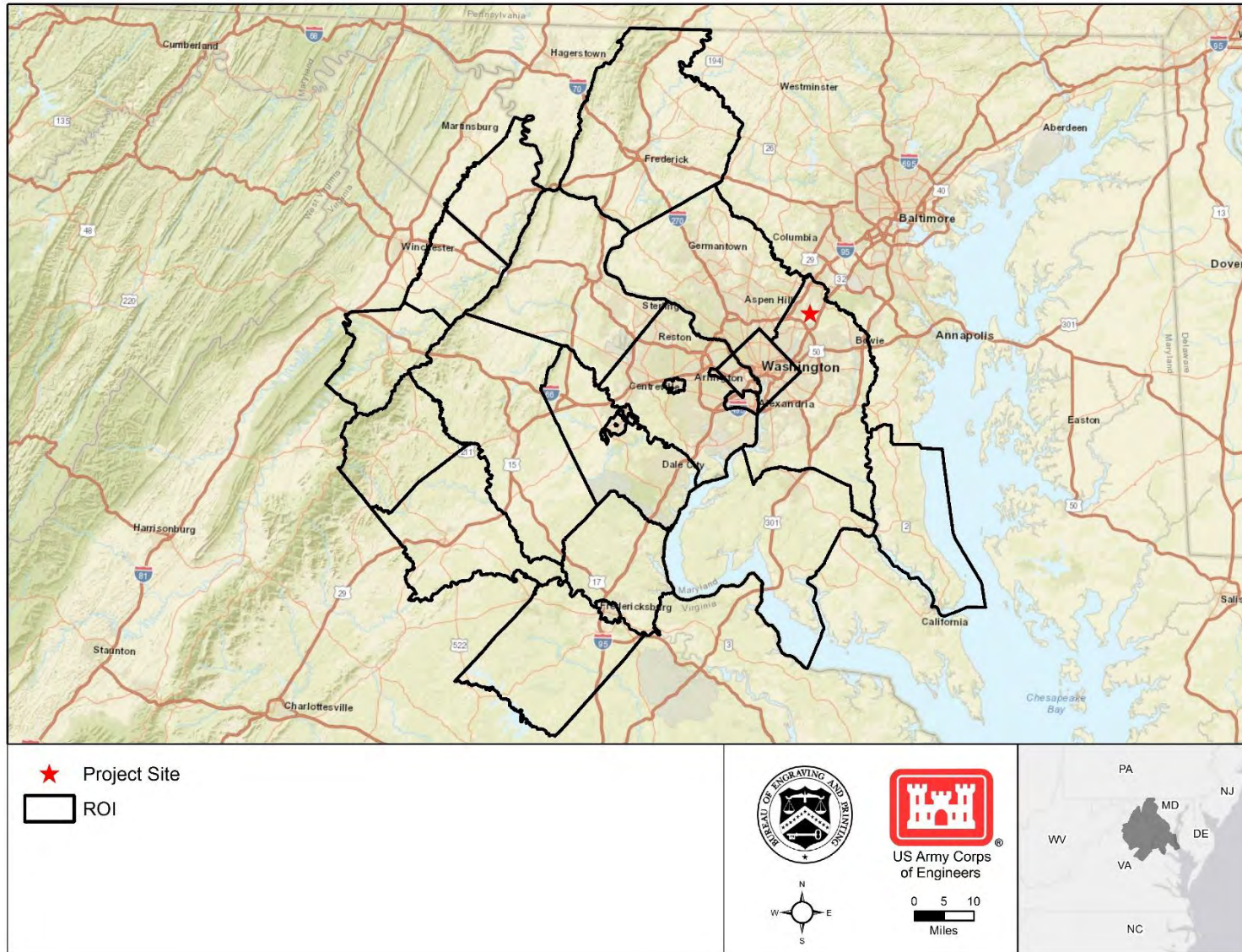


Figure 3.12-1: Socioeconomic ROI

Environmental Justice ROI

The EJ ROI includes 17 block groups, located within eight census tracts (see **Table 3.12-1** and **Figure 3.12-2**). The Project Site is located entirely within census tract 8074.08, block group 1.

Table 3.12-1. Block Groups in the EJ ROI

Census Tract	Block Groups	Census Tract	Block Groups
8004.11	1	8067.13	1, 2
8067.06	1	8067.14	1, 2
8067.08	1, 2, 3	8074.04	1, 2, 3
8067.12	1, 2	8074.08	1, 2, 3

3.12.1.2 Applicable Guidance

The primary regulations related to the Proposed Action's impacts on socioeconomic 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.

3.12.1.3 Existing ConditionsSocioeconomic Characteristics

The [US Census Bureau](#) and [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, 2017; US Census Bureau, 2018; US Census Bureau, 2019a).

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, 2019a).

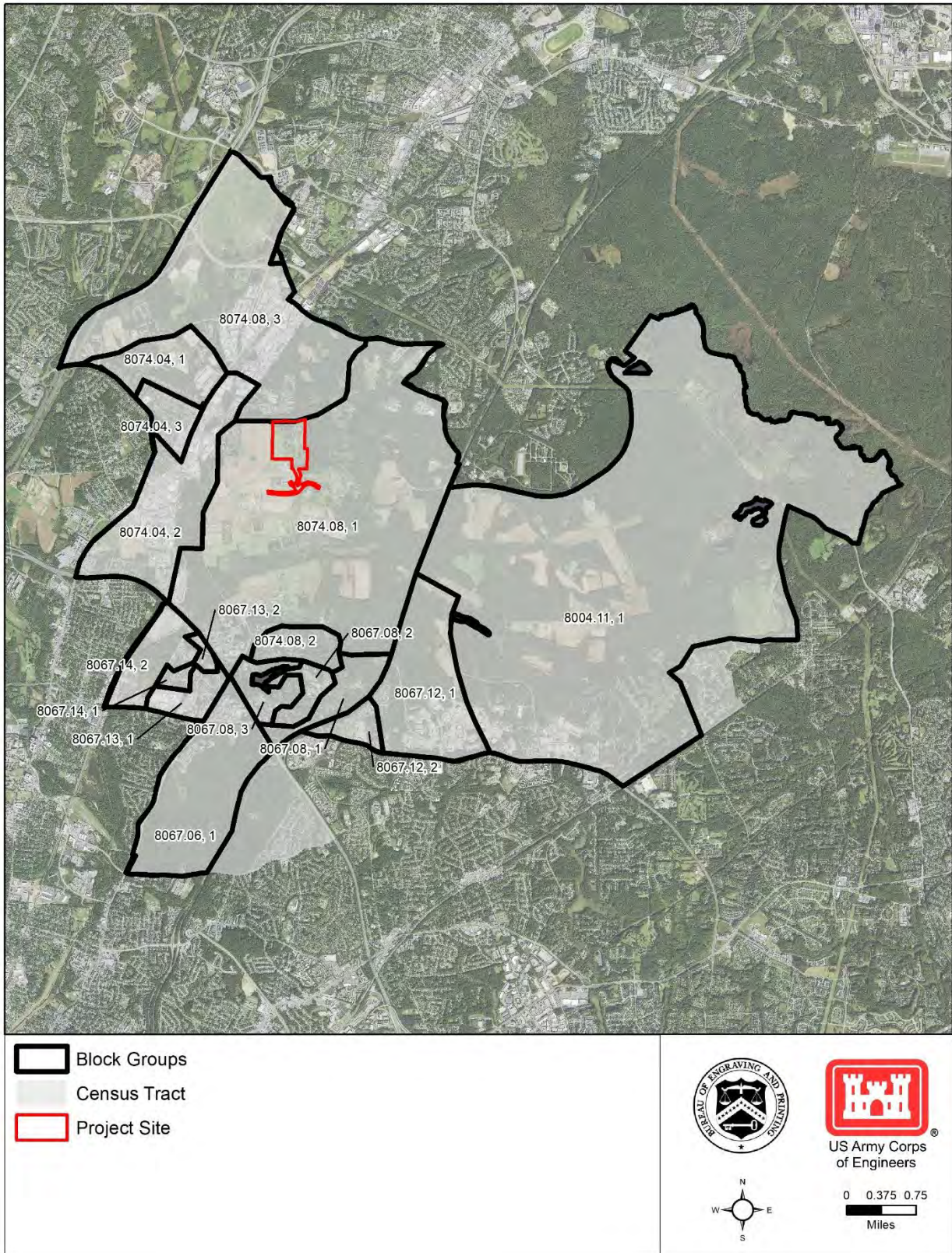


Figure 3.12-2: Environmental Justice ROI

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, 2017; 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, 2019b; US Census Bureau, 2019c). Therefore, an EJ community of concern is present within the EJ ROI with respect to race.

More specifically, 14 of the 17 block groups in the ROI have a minority population that exceeds the 50 percent threshold. Census tract 8074.08, block group 1, which contains the Project Site, is 72.8 percent minority, and is one of the 14 block groups with a minority population above 50 percent. **Figure 3.12-3** depicts the spatial distribution of minority populations within the EJ ROI.

Low-Income Populations

Following the [CEQ guidance](#), Treasury compared income and poverty levels regionally to determine the presence of EJ communities of concern with respect to income and poverty (CEQ, 1997). The largest disparity in median household income exists between Prince George's County (i.e., the highest level) and the EJ ROI (i.e., the lowest level), with a difference of approximately \$6,400 per year. A slightly smaller disparity exists regarding per capita income, with a difference of approximately \$4,900 per year between the highest and lowest level (i.e., Maryland and Prince George's County) (US Census Bureau, 2019d; US Census Bureau, 2019e).

As shown in **Figure 3.12-4**, the per capita incomes of 6 of the 17 block groups within the EJ ROI are less than \$37,799 (i.e., the per capita income of the EJ ROI as a whole). These six block groups also have minority populations exceeding 50 percent. The block group which contains the Project Site, census tract 8074.08, block group 1, also has a per capita income below that of the ROI, but with a difference of only approximately \$1,300.

Poverty data for the year 2019 are not reported at the block group level. Therefore, poverty levels for the EJ ROI have been determined using census tract data.²⁶ The poverty rate across these eight census tracts is 7.9 percent, compared to 8.5 percent for Prince George's County and 9.2 percent for the state of Maryland (US Census Bureau, 2019f).

²⁶ While the EJ ROI consists of 17 block groups, the eight census tracts encompassing the EJ ROI include a total of 20 block groups.

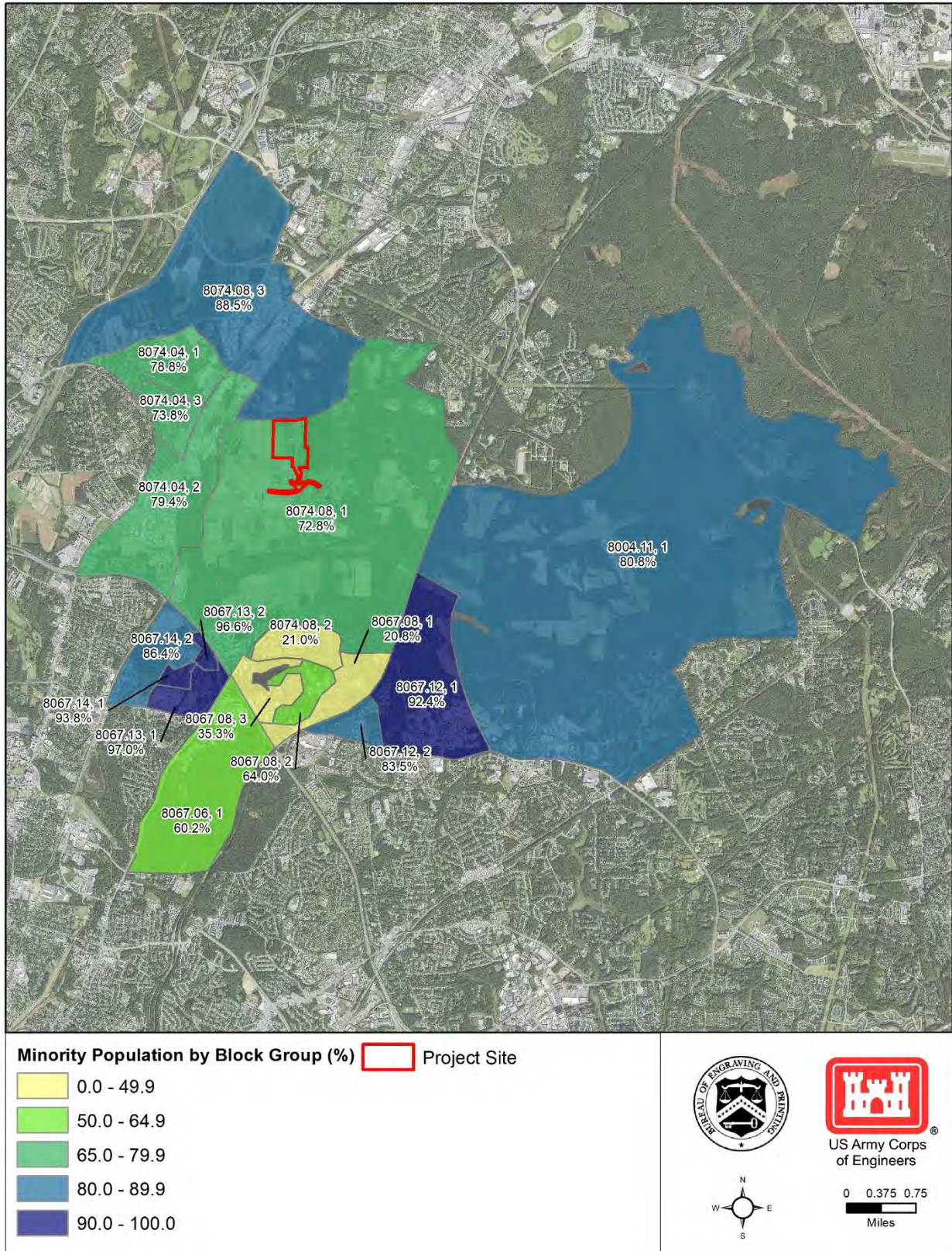


Figure 3.12-3: Minority Populations in the EJ ROI

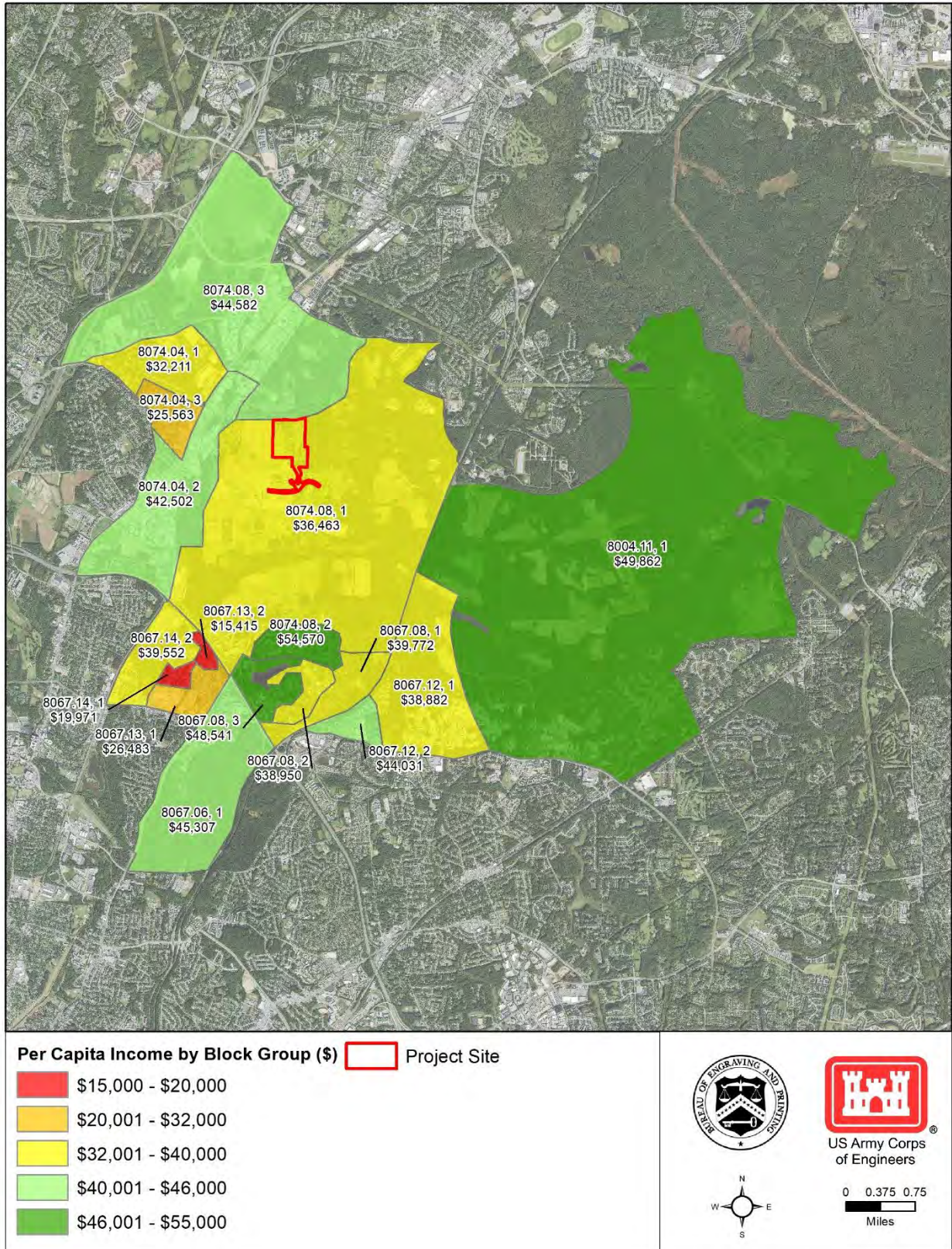


Figure 3.12-4: Low-Income Populations in the EJ ROI

Although some disparity exists for median household income when comparing the EJ ROI with the broader county and state geographies, the per capita income of the entire EJ ROI is comparable to, and slightly higher than, that of Prince George's County. Moreover, the EJ ROI has the lowest poverty rate of the three geographies considered. Therefore, the EJ ROI as a whole is not considered to be an EJ community of concern with respect to low income. However, the six block groups within the EJ ROI that have per capita incomes below that of the overall EJ ROI (see **Figure 3.12-4**) may be considered EJ communities of concern with respect to low income.

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.

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, 2019c).

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 and traffic (see **Sections 3.4 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

Treasury should implement mitigation measures recommended in **Sections 3.3** and **3.10** to reduce potential adverse impacts, including potential significant adverse impacts to traffic and transportation that could affect EJ communities of concern. Additionally, Treasury should implement the following project-specific mitigation measure to reduce the potential for adverse EJ impacts:

- Issue quarterly (i.e., every three months) informative newsletters containing updates regarding the Proposed Action to residents of Vansville within the Proposed Action's EJ ROI. Treasury may tailor the distribution lists based on which EJ communities may be impacted by different components of the Proposed Action. Publish the newsletter online, issue via email distribution, and regular mail to interested residents of the listed EJ communities, as necessary to ensure availability. The newsletter should contain Government point-of-contact information for interested residents to contact Treasury with questions or concerns regarding the Proposed Action.

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.

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.

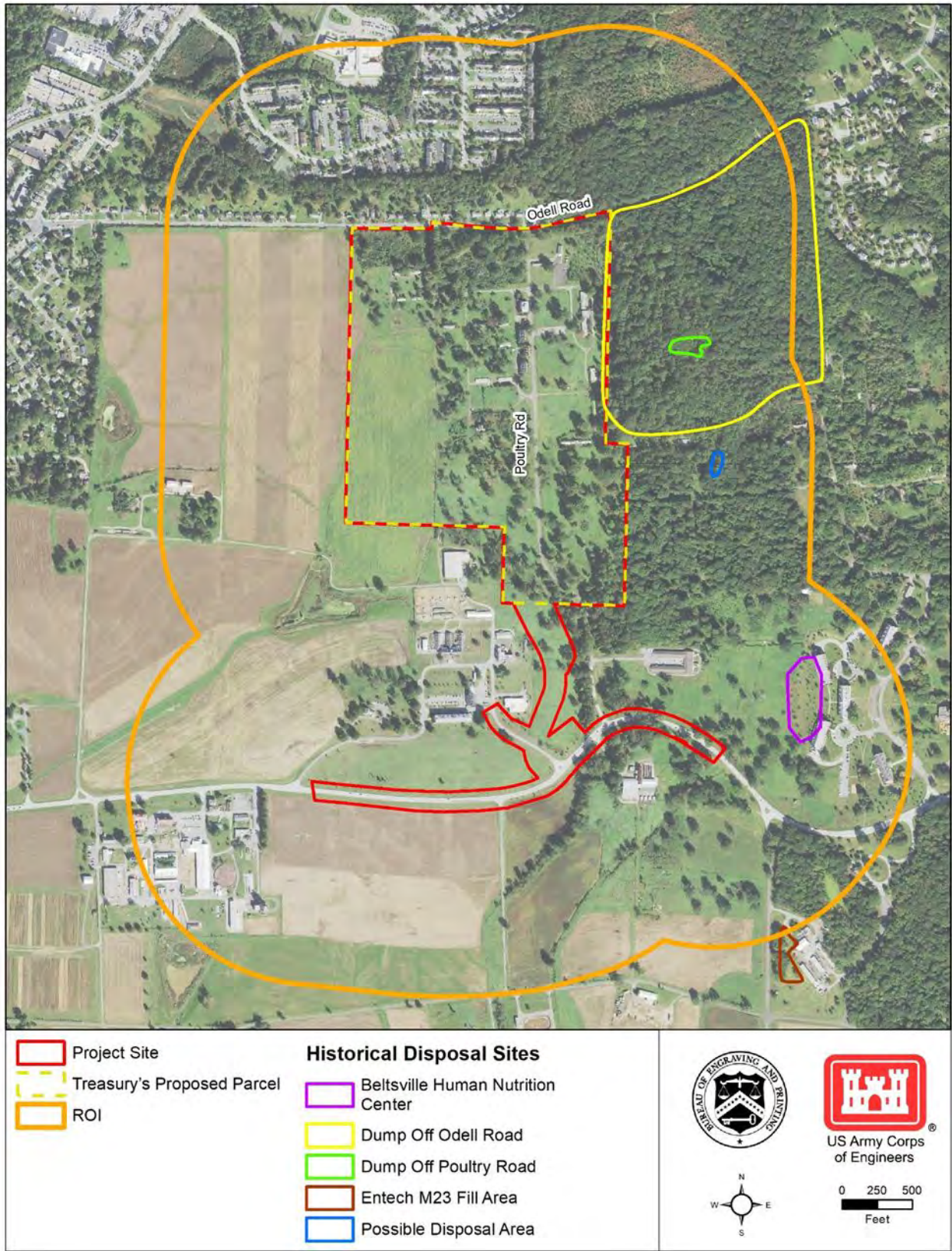


Figure 3.13-1: HTMW ROI

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, asbestos-containing materials (ACMs), lead-based paints, 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 (MCP) 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.

At its existing facilities, Treasury implements specific measures to ensure the safe management of hazardous materials associated with its operations. All industrial operations, including shipping and receiving, storage of production materials, and storage of municipal waste dumpsters, are conducted indoors to prevent releases into the environment (such as through stormwater). Within all chemical use areas, drains are capped or otherwise protected against spills to prevent chemicals from entering sanitary sewers.

Treasury does not store any materials in USTs. All aboveground storage tanks (ASTs) have full spill protection with alarms, and are installed such that all external tank walls can be visually inspected. Treasury also performs routine inspections of ASTs and portable chemical containers, hazardous material, and waste storage areas in accordance with regulatory requirements and industry standards and performs corrosion monitoring of internal tank walls in accordance with industry standards.

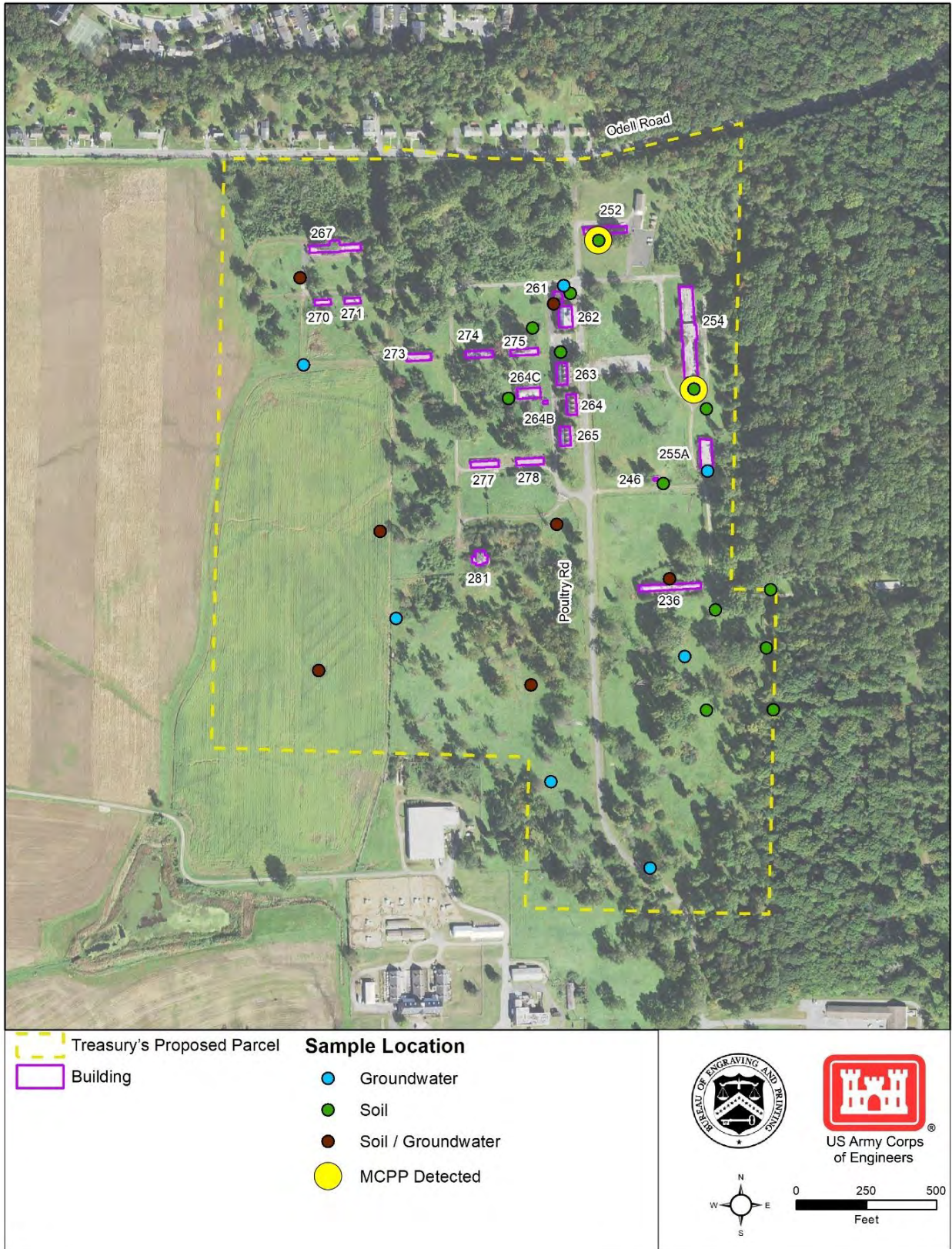


Figure 3.13-2: Soil and Groundwater Sampling Sites within Treasury’s Proposed Parcel

Treasury trains its employees on waste management, spill prevention, and spill reporting procedures annually, and performs spill response drills. Treasury employs dedicated professionals on staff to manage hazardous materials and spill prevention and response programs and maintains contractual agreements for the provision of emergency spill response services on-site as needed.

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 may continue to fall into disrepair, potentially releasing existing contaminants into the environment (i.e., primarily to nearby soils). These releases would likely be minor, occur very gradually and intermittently over an extended period of time, and remain within the immediate vicinity of the facilities.

If on-site buildings with ACM pipe insulation are exposed to wind (e.g., broken windows), there could be a potential health risk to BARC personnel that enter those buildings from airborne asbestos. The USDA, however, would be responsible for managing the buildings, including associated HTMW, in accordance with federal and state regulations. Therefore, any BARC employees required to approach the existing deteriorating buildings would do so in accordance with OSHA standards and the USDA's health and safety protocols, and would utilize appropriate PPE.

There would be no increase in human health risk to off-site receptors. Similarly, while contaminants could accumulate within the soils adjacent to the facilities, there would be no substantial increase in ecological risk due to the very minor nature of the releases. Therefore, there could be a continued **less-than-significant adverse impact** on the Project Site.

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, 2019d). Hazardous materials may include solvents, acids, bases, inks, petroleum-based lubricants, fuels (e.g., diesel), 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.

Treasury would implement the same procedures at the proposed CPF as identified above in **Section 3.13.1.3** for its existing operations. In addition, Treasury would develop and implement an SPCCP; an Emergency Response Plan that complies with OSHA HAZWOPER and USEPA RCRA regulations; and a SWPPP for the proposed CPF to standardize and codify Treasury's HTMW protocols on the Project Site. 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, see **Section 3.7.2.2**) (BEP, 2019a; Treasury, 2018a).

Similar to hazardous materials described above, hazardous wastes would be stored and handled on-site by trained personnel in highly regulated and controlled manners, and transported off-site for disposal in accordance with federal and state regulations. 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**), which is consistent with the ROI for HTMW (see **Section 3.13.1.1**). The ROI includes all areas where human health and safety could reasonably be affected by the Proposed Action.

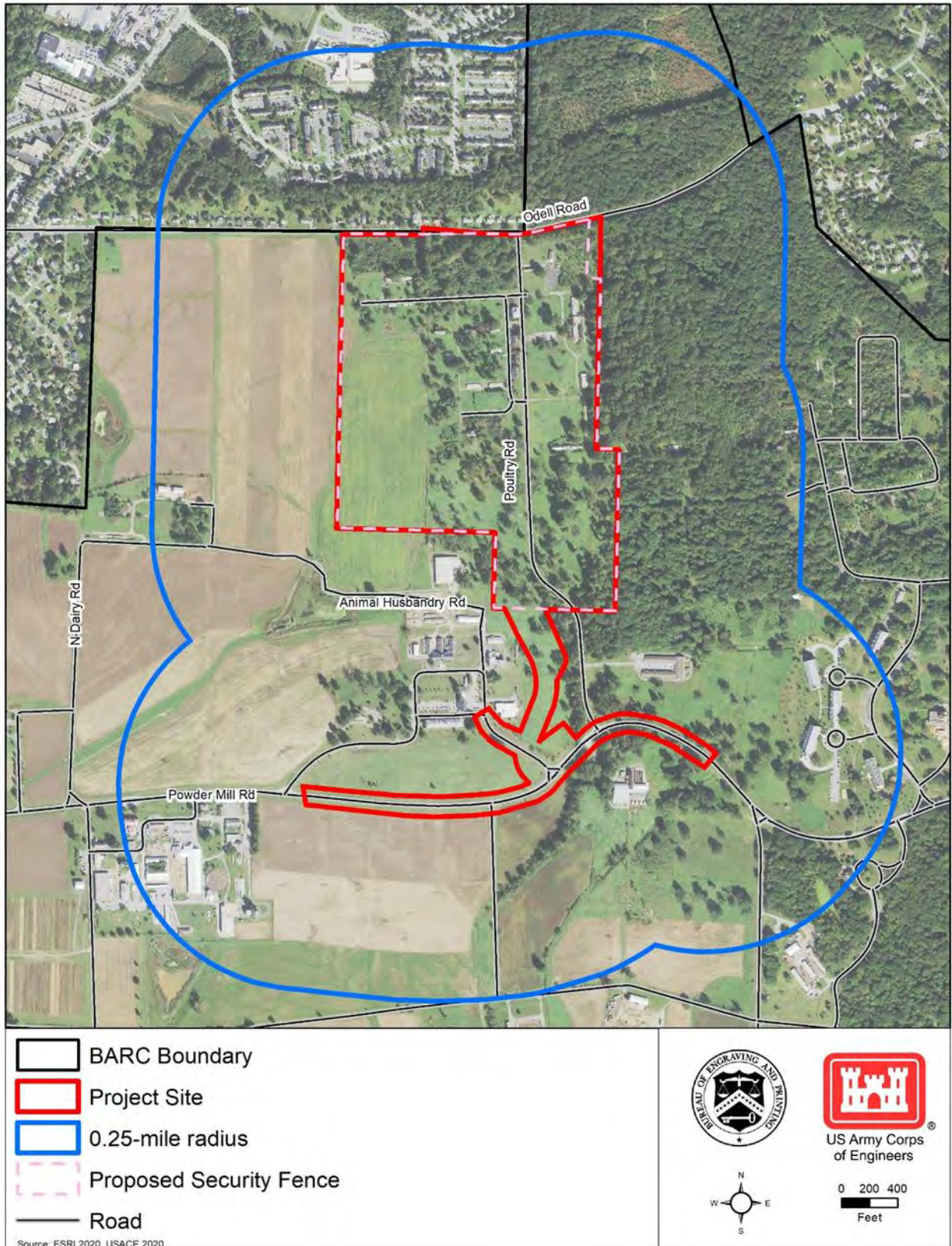


Figure 3.14-1: Human Health and Safety ROI

3.14.1.2 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.

3.14.1.3 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, 2017a). 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.

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. 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). The Project Site, however, does contain HTMW associated with the on-site vacant and deteriorating buildings (e.g., lead-based paints, asbestos, etc.).

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

Additionally, as described in **Section 3.13.2.1**, the existing facilities within the Project Site may continue to fall into disrepair, potentially releasing existing contaminants into the environment. While Treasury does not anticipate any on-site structures would collapse, further deterioration of these facilities could compromise their structural integrity to some degree, leading to unsafe conditions. These factors would increase human health and safety risks for BARC employees coming onto the site.

The USDA, however, would be responsible for managing the buildings, including associated HTMW and structural integrity, in accordance with federal and state regulations. Therefore, while the Project Site would generally remain vacant under the No Action Alternative, any BARC employees required to approach the existing facilities would do so in accordance with OSHA standards and the USDA's health and safety protocols, and would utilize appropriate PPE. Therefore, further deterioration of on-site facilities could result in a continued **less-than-significant adverse impact** to health and safety of BARC 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 3.14.1.3**).

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, in accordance with ISC Level IV federal facility security requirements (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.

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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. Of note, the MAGLEV (i.e., superconducting magnetic levitation train) project could permanently impact up to 160 acres of forest and up to 16 acres of wetlands on BARC (see the [Cumulative Effects Analysis Technical Memorandum](#)) (USDOT et al, 2021). The temporary nature of construction, as well as the incorporation of standard BMPs, RCMs, and EPMs into the Proposed Action, would ensure that 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, such as the I-495 & I-270 Managed Lanes Study, 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.

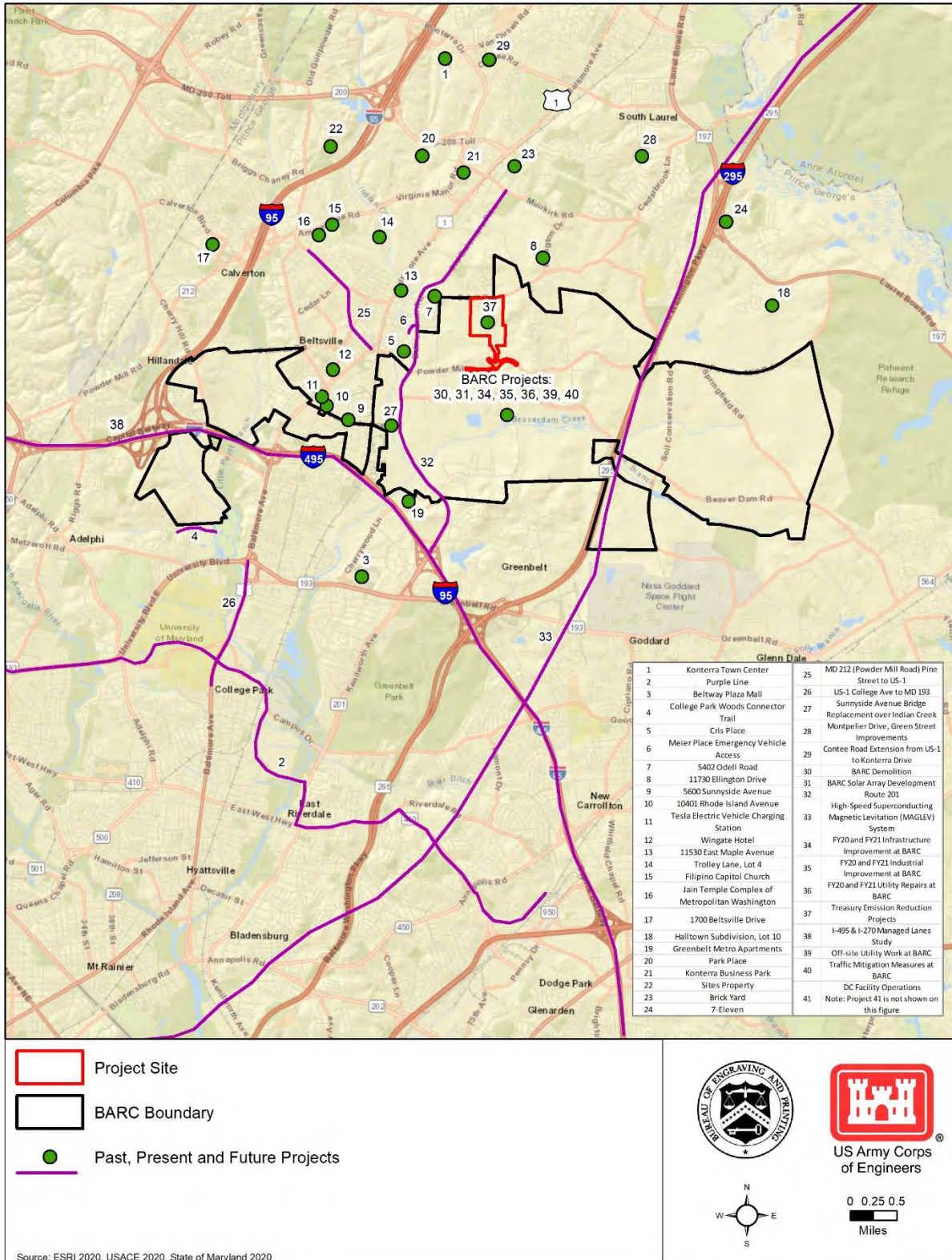


Figure 4.5-1: Past, Present, and Reasonably Foreseeable Future Actions in the Combined ROIs

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, may continue to degrade and fall into disrepair. The USDA, as a federal agency, would take the necessary steps to comply with the NHPA to maintain the BARC Historic District, thereby keeping potential adverse cumulative impacts to cultural resources at **less-than-significant** levels. Similarly, deterioration of existing buildings may release contaminants into the environment, including the soil, resulting in potential HTMW and soils impacts. Potential health and safety risks could also arise for BARC employees required to be near or enter the degraded facilities. BARC employees would operate in accordance with the USDA's health and safety protocols to ensure potential adverse cumulative impacts to soils, HTMW, and human health and safety remain at **less-than-significant levels** when considered with other actions in the ROI.

As no incremental effects would occur to other resource areas under the No Action Alternative, **no cumulative impacts** would be expected on the following resource areas when considered with past, present, and reasonably foreseeable future projects: land use; visual resources; air quality; noise; topography; water resources; biological resources; traffic and transportation; utilities; and socioeconomics/EJ.

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; soils; water resources; biological resources; visual resources; traffic; utilities; HTMW; and human 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, such as MAGLEV, 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 human 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 **significant adverse cumulative impacts** on water resources, cultural resources, and traffic, as well as **disproportionate significant adverse cumulative impacts** on EJ communities, as discussed below.

- Construction of the Preferred Alternative would result in **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 **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 **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 should consider applicable mitigation measures to minimize the Proposed Action's contribution to cumulative impacts.
- 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. With adherence to appropriate permits and compliance with applicable emission standards, cumulative impacts on EJ communities from air emissions would be minimized to ***less-than-significant*** levels. Traffic from the Preferred Alternative and other actions in the ROI, however, would result in ***significant adverse cumulative impacts*** on EJ communities. Project-specific impact-reduction measures would be implemented by project proponents to the extent practicable. In addition, Treasury should consider implementing traffic mitigation measures, such as intersection upgrades, to minimize the Proposed Action's contribution to cumulative impacts.

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.

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 potential significant adverse impacts to less-than-significant or acceptable levels, are summarized in **Section 5.5**. Any unmitigable 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 potential 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 potential impacts to traffic (and therefore EJ communities of concern), visual resources, water resources, and cultural resources would remain 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 of 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 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 potential 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 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, RCMs, and BMPs 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.

Treasury identified additional, recommended mitigation measures to reduce potential adverse impacts that would not be sufficiently reduced through EPMS, RCMs, and BMPs. 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.

Table 5.5-1: Summary of Potential Environmental Impacts on Evaluated Resource Areas¹

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.	<u>Construction:</u> Less-than-significant adverse impact on surrounding land uses from construction activities. <u>Operation:</u> 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.	<u>Construction:</u> 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. <u>Operation:</u> Less-than-significant adverse impacts to views from roadways; significant adverse impacts to views from residences along Odell Road; negligible adverse impacts along Powder Mill Road from a new traffic control device; significant adverse impacts on nighttime lighting levels for residences along Odell Road.
Air Quality	No impact on air quality.	<u>Construction:</u> Less-than-significant adverse impacts from criteria pollutant, fugitive dust, and GHG emissions; negligible adverse impacts from HAP emissions. <u>Operation:</u> 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.	<u>Construction:</u> Less-than-significant adverse impacts on noise-sensitive receptors from construction activities. <u>Operation:</u> 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 armored truck traffic traveling through BARC; beneficial impacts to noise-sensitive receptors from the removal of rumble strips on Powder Mill Road.
Topography and Soils	No impact to topography. Less-than-significant adverse impact to soils from the release of contaminants due to building deterioration.	<u>Construction:</u> No or negligible adverse impact to soils from vegetation removal and compaction; no impact to topography <u>Operation:</u> No or negligible adverse impact from stormwater runoff; no significant impact to designated farmland soils; no impact to topography.
Water Resources	No impact on water resources.	<u>Construction:</u> 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 from excavation and potential contaminant mobilization; no adverse impact to the coastal zone.

Resource Area	No Action Alternative	Preferred Alternative
		<p><u>Operation:</u> 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.</p>
<p>Biological Resources</p>	<p>No impact on biological resources.</p>	<p><u>Construction:</u> Less-than-significant adverse impact on forest resources and vegetation from the conversion of vegetated land to developed land; no impact on invasive species; 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 bald eagles and migratory birds.</p> <p><u>Operation:</u> 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; negligible impact on bald eagles and migratory birds from an increase in ambient noise and light levels; less-than-significant adverse impact on migratory birds from the potential for window strikes.</p>
<p>Cultural Resources</p>	<p>No impact on archaeological or paleontological resources. Less-than-significant adverse impact on the BARC Historic District and its contributing resources due to building neglect and deterioration.</p>	<p><u>Construction:</u> No impact to one potential NRHP-eligible archaeological site; no impact on paleontological resources; less-than-significant adverse impacts on previously unknown archaeological and paleontological sites if discovered during construction; less-than-significant adverse impact from the demolition of 22 contributing resources to the BARC Historic District.</p> <p><u>Operation:</u> 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.</p>
<p>Traffic and Transportation</p>	<p>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</p>	<p><u>Construction:</u> 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.</p> <p><u>Operation:</u> Less-than-significant adverse impact on roadways in the regional ROI; less-than-significant adverse impact to local traffic during congested periods; less-than-significant adverse impact on public safety from potential cut-through traffic; 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 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</p>

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.	from failing queue lengths; no impact to parking; less-than-significant adverse impact to the pedestrian and bicycle network; negligible adverse impacts to public transit and transit revenue from shifts in ridership.
Utilities	No impact on utilities.	<u>Construction:</u> 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. <u>Operation:</u> Negligible adverse impacts on utility demand and availability from increased usage.
Socioeconomics and Environmental Justice	No impact to the socioeconomic environment or EJ communities.	<u>Construction:</u> 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. <u>Operation:</u> 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.	<u>Construction:</u> Less-than-significant adverse impact from accidental release of HTMW; beneficial impact from removal and off-site disposal of regulated building materials. <u>Operation:</u> 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 to Treasury staff from the continued use of the DC Facility and the inability to address safety and security risks. Less-than-significant adverse impact to BARC staff from the continued presence of HTMW and unsafe buildings on BARC.	<u>Construction:</u> 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. <u>Operation:</u> 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 potential significant adverse impacts.

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, petition Prince George's County for a zoning reclassification of Treasury's proposed parcel from "Residential" to "Industrial."
- As described for Visual Resources, establish landscape buffers, including appropriate-height vegetation, on all sides of Treasury's proposed parcel to minimize views from off-site areas, to the extent practicable while still meeting site security requirements.

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. Fencing material and design character should be open to the extent permitted by security criteria with the understanding that the perimeter fencing should not appear visually defensive.
- Establish landscape buffers, including appropriate-height vegetation, on all sides of Treasury's proposed parcel to minimize views from off-site areas, to the extent practicable while still meeting site security requirements. The natural topography obscures the views of the new building from the adjacent public roads.
- 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.

Noise

- As described for Visual Resources, establish landscape buffers, including appropriate-height vegetation, on all sides of Treasury's proposed parcel to further reduce off-site noise, to the extent practicable while still meeting site security requirements.

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

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).
- As described under Visual Resources, establish landscape buffers, including appropriate-height vegetation, on all sides of Treasury's proposed parcel to minimize views from off-site areas, to the extent practicable while still meeting site security requirements. This mitigation measure would further reduce potential adverse impacts to the bald eagle nest located approximately 0.6 mile south of the Project Site.
- Construct and maintain the proposed stormwater management features to provide as much wildlife habitat value as possible.
- Develop the landscape design plan to revegetate Treasury's proposed parcel with native vegetation and micro-habitats (e.g., maintained meadows and additional reforestation) such that it maximizes wildlife values.

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. Please see also the mitigation measures identified for Visual Resources.

Traffic and Transportation:

- Propose, consult with public stakeholders, and ultimately design and implement mitigation measures for Intersections 6, 8, 10, 12, 13, and 14 as detailed in the [Transportation Impact Study](#). Ultimate implementation would be contingent upon receiving approval from appropriate stakeholders.
- Propose, consult with public stakeholders, and ultimately implement mitigation measures for Intersection 7 as detailed in the [Transportation Impact Study](#) to minimize safety hazards at this intersection caused by gap acceptance issues. Ultimate implementation would be contingent upon receiving approval from appropriate stakeholders.
- In consultation with local planning authorities, implement traffic-calming devices (e.g., speed bumps) and/or reduce speed limits 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 on-site pedestrian and/or bicycle amenities into the Preferred Alternative during the design process.
- Consult with WMATA regarding the opportunity to adjust Metrobus routes to serve the proposed CPF more effectively, and, if applicable, to install bus stop shelters, 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.

Socioeconomics and Environmental Justice

- Issue quarterly (i.e., every three months) informative newsletters containing updates regarding the Proposed Action to residents of Vansville within the Proposed Action's EJ ROI. Treasury may tailor the distribution lists based on which EJ communities may be impacted by different components of the Proposed Action. Publish the newsletter online, issue via email distribution, and regular mail to interested residents of the listed EJ communities, as necessary to ensure availability. The newsletter should contain Government point-of-contact information for interested residents to contact Treasury with questions or concerns regarding the Proposed Action.

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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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

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Benton, Charles	BA, Environmental Science	Biological Resources	24
Boose, Brian W., CEP	BS, Biological Sciences/Ecology	Program Manager; Senior QA/QC	33
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	11
Dover, Robert, PG	MS, Geology	Topography and Soils; HTMW	35
Glucksman, Andrew, LEED AP	MS, Agronomy	Land Use; HTMW	20
Kisak, Natalie	BA, Environmental Studies, Public Policy	Water Resources; Socioeconomics and EJ; Utilities	2

Name	Education	EIS Role	Years of Experience
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Liguori, Stephanie, CNRP	BS, Environmental Science	Air Quality; Traffic and Transportation	9
Lytle, Melanie	Master of Historic Preservation	Cultural Resources	15
Mandrup-Poulsen, Justin	MS, Geographic Information Systems	GIS Analysis and Graphics	6
McGovern, Rebecca	BA, Historic Preservation	Cultural Resources	4
Minichino, Brian	BS, Chemistry	Noise; Air Quality	12
Moreland, Patrick	BS, Soil Science	Water Resources	18
Norris, Brian	MS, Geography	GIS Analysis and Graphics	6
Obenland, Benjamin	BS, Environmental Science and Policy	Biological Resources; Topography and Soils	2
Prakash, Jagadish, AICP	Master of City and Regional Planning	Socioeconomics and EJ	17
Robertson, Michael	Master of Environmental Studies	Senior Technical Advisor; Senior QA/QC	17
Sale, Claire, AICP	Master of Regional Planning	Visual Resources	21
Seibel, Scott, RPA	MS, Archaeomaterials	Cultural Resources	23
Warf, Jennifer	MS, Environmental Studies	Senior Technical Advisor; Senior QA/QC	19
Wu, Charlene	Master of Environmental Management	Cumulative Impacts; Utilities; Socioeconomics and EJ	8

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.

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Mr. Allan Stoner President Friends of Agricultural Research – Beltsville PO Box 1061 Beltsville, MD 20705	Mr. Jim Butcher Director, Community Outreach Friends of Agricultural Research – Beltsville PO Box 1061 Beltsville, MD 20705	Mr. Aaron Marcavitch Anacostia Trails Heritage Area, Inc. Maryland Milestones Heritage Center 4318 Gallatin Street, Maryland Milestones Heritage Center Hyattsville, MD 20781
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Mr. Tom Taylor Beaverdam Creek Watershed Watch Group	Mr. Frank Gervas President Greenbelt Access Television	Mr. John "JD" Perkins Vansville Heights Citizen Association
BARC Migratory Birds Community Organization	Mr. Dan Smith Friends of Lower Beaverdam Creek	Ms. Gail Richards Greenbelt Homes, Inc.
Mr. Michael Hartman Greenbelt Climate Action Network	Reverend Jalene Chase Emmanuel UMC – Beltsville	Mr. Thomas Valone President Integrity Research Institute
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 Tribal Historic Preservation
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 Tuscarora Nation of New York,
 Tuscarora Environment Office
 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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9.0 Draft EIS Public Comments and Responses

Treasury received 506 distinct comments on the DEIS. All public comments received on the DEIS are provided on the [project website](#). Treasury grouped all public comments in the table below according to topic in the order each topic is discussed in this EIS. Certain portions of the DEIS received several, generally similar comments. “Master Responses” to each of these more heavily commented topical areas, designed to respond to the thematic, topical groupings, are provided below.

Topical Area 1. Alternatives Screening Process

Treasury conducted a thorough and adaptive alternatives screening process for this Proposed Action, which is described sequentially in **Section 2.3**. Treasury initially considered over 80 potential sites throughout the NCR, including private and federal parcels, and screened these sites against initial, preliminary screening criteria. As Treasury further studied its requirements for the Proposed Action (i.e., through completion of a [Future Workplace Recommendations Report](#) and Facility Feasibility Study, which included detailed analyses of space utilization at the existing DC Facility), Treasury further honed its screening criteria to ensure that potential sites under consideration would be able to support the Proposed Action.

Several commenters inquired specifically about the screening criterion of a 100-acre minimum parcel size. Based on its knowledge of its operations and space utilization at the WCF, Treasury believed even during its initial site screening in 2015 that 100 acres would likely be needed. However, at that time, Treasury’s formal studies of facility requirements had not been completed. As such, Treasury screened non-secured sites using a conservative 60-acre minimum, but noted that 100 acres would be desirable (GSA, 2015).

Later, in 2017, Treasury’s Future Workplace Recommendations Report and Facility Feasibility Study were completed (BEP, 2017b; BEP, 2017c), which confirmed the site requirements necessitating a minimum 100-acre parcel; **Section 2.3** was revised to include these requirements. Several commenters also noted that the construction LOD would avoid impacts to approximately 22 acres of the site. While these areas (e.g., the existing forest conservation easements) would not be within the anticipated LOD, this space is still necessary for the Proposed Action to enable Treasury to meet current physical security standards (e.g., security setback distances and a secure perimeter) in accordance with [ISC standards](#) (ISC, 2016).

Once Treasury determined that only the 200 Area at BARC would be a reasonable alternative for detailed analysis for this Proposed Action, Treasury conducted a [Conceptual Site Layouts and Utility Study](#) (BEP, 2020b) to study potential space utilization of the Project Site and ensure it would meet Treasury’s purpose of and need for the Proposed Action. **Section 2.4.2** was revised to refer to this report and explain the role of the concept design presented in **Figure 2.4-2** as it relates to the environmental analysis in this FEIS.

Based on requests in the public comments, Treasury published the [Federal Agency Initial Site Investigation and Screening Report](#) and [Conceptual Site Layouts and Utility Study](#) (GSA, 2015; BEP, 2020b) on the project website. Treasury has also published the executive summaries of its [Future Workplace Recommendations Report](#) and [Facility Strategic Alternatives Study](#) (BEP, 2017b; Booz Allen Hamilton Inc., 2013); these reports contain sensitive information and cannot be published in full at this time. Finally, the 1996 BARC Master Plan Update (USDA, 1996) can be provided to stakeholders upon request.

Topical Area 2. Perceived “Connected” Actions

Several commenters inquired about the potential environmental effects of the following three activities associated with the Preferred Alternative: proposed off-site utility work; recommended traffic mitigation measures; and the future use of the DC Facility. Treasury revised **Section 2.4.2** to discuss its intent to complete additional, supplemental NEPA analysis for off-site utility work and traffic mitigation measures in

the future, should Treasury select the Preferred Alternative for implementation in the ROD for this NEPA process.

As recommended by CEQ's NEPA Implementing Regulations, Treasury initiated this NEPA process early in the project planning stages, generally concurrent with the conceptual design process. Specifically, per 40 CFR 1501.2: "Agencies shall integrate the NEPA process with other planning at the earliest possible time to insure that planning and decisions reflect environmental values, to avoid delays later in the process, and to head off potential conflicts." Consequently, the locations and nature of proposed off-site utility work and the specifics of recommended traffic mitigation measures are not known at this time. Treasury does not have enough information at this point on which to conduct a meaningful environmental impact analysis regarding these two particular areas. Treasury does anticipate, however, that the EPMs, RCMs, and BMPs identified in this FEIS (see **Table 2.2-1**) would be included as components of these future activities, and incorporated through the supplemental, "tiered" NEPA analysis.

Further, CEQ Regulations encourage agencies to focus on components that are "ripe" for analysis. Per 40 CFR 1502.20: "Agencies are encouraged to tier their environmental impact statements to eliminate repetitive discussions of the same issues and to focus on the actual issues ripe for decision at each level of environmental review." Per 40 CFR 1508.28: "Tiering in such cases is appropriate when it helps the lead agency to focus on the issues which are ripe for decision and exclude from consideration issues already decided or not yet ripe."

As described in **Section 2.2.3**, Treasury's plans for the existing DC Facility if it implements this Proposed Action are not yet determined. Future changes to those facilities, or the operations conducted therein, would constitute separate proposed actions, and Treasury would prepare appropriate NEPA documentation for those actions. As the DC Facility is a federal property, the facility could be re-used by another federal agency or could continue to be used by Treasury for another or more limited purpose. Should the federal government determine the DC Facility is excess property no longer needed by the federal government, the property would be disposed of in accordance with applicable regulations via the GSA. Again, per the above-referenced CEQ Regulations, Treasury would conduct the subsequent NEPA analyses when future options for the DC Facility are defined.

Topical Area 3. Wastewater Treatment – On-site Treatment

Treasury revised **Section 3.7.2.2** of this FEIS and the [Water Resources Technical Memorandum](#) to provide additional detail regarding Treasury's proposed on-site wastewater treatment, including its several industrial wastewater streams and associated pretreatment processes. The USDA would provide Treasury with its current MDE-permitted effluent quality standards, and Treasury would be responsible for ensuring its wastewater meets these standards before it is discharged to the sanitary sewer system. Treasury's wastewater discharge would contain no elevated levels of metals or other pollutants that would exceed the BARC East WWTP's treatment abilities.

Topical Area 4. Wastewater Treatment – BARC East WWTP and Beaverdam Creek

Treasury revised **Sections 3.7.2.2** and **3.11** of this FEIS to state the current permitted capacity and average daily use/discharge from the BARC East WWTP. The Proposed Action would increase discharge from the WWTP by approximately 120,000 gpd, but total discharge from the WWTP would remain at approximately half (or less) of the MDE-permitted capacity of the WWTP. As described above, Treasury's wastewater would be pretreated at the proposed CPF, and would have a final composition consistent with the USDA's requirements and the WWTP's treatment abilities. The WWTP is not anticipated to require any modifications or upgrades, and would continue to operate under its existing permit (i.e., no permit modifications are anticipated to be required) that complies with the Anacostia River and Chesapeake Bay TMDLs.

Topical Area 5. Stormwater Management / Green Infrastructure / Low Impact Development

The DEIS included as an EPM/RCM that Treasury would incorporate GI/LID features into the Preferred Alternative to manage stormwater and comply with applicable regulations (e.g., Section 438 of the EISA). The “stormwater infrastructure” depicted on **Figure 2.4-2** is intended to be representative of these features. To elaborate on this component of the Proposed Action, Treasury revised **Section 2.2.1** of this FEIS to include a brief description of the types of GI/LID features being considered during the (current) preliminary design process of the Proposed Action, as well as the state of Maryland stormwater requirements that Treasury is using as its design basis. Additionally, Treasury revised **Section 3.7.2.2** of this FEIS to provide more explanation of how these features would minimize potential impacts to water quality and quantity.

Numerous commenters inquired about the use of future rainfall projections when designing the stormwater management strategy for the proposed CPF to account for climate change and potentially more intense future rainfall events. In accordance with federal, state, and local regulations and guidelines, Treasury is using empirical/historical rainfall data to develop its on-site stormwater management strategy. Treasury may consider future rainfall projections with respect to the stormwater conveyance design; however, due to significant uncertainty regarding the extent of potential future rainfall increases (and particularly the magnitude of the 100-year storm event), Treasury cannot provide further detail at this time.

Topical Area 6. Potential Impacts to Bald Eagles

Treasury revised **Section 3.8** of this FEIS to include an analysis of potential impacts to bald eagles. Treasury consulted with the USFWS regarding the Proposed Action’s potential to disturb bald eagles or their foraging areas. As recommended by the USFWS, Treasury completed the Northeast Bald Eagle Project Screening Form and self-certified that it would incorporate the USFWS’s identified avoidance measures into the Proposed Action (see **Table 2.2-1**). **Section 3.8** also notes that the bald eagle nest located south of the Project Site is popular with local bird watchers and is known to produce successful eaglets. Finally, **Section 3.8.3** of this FEIS now refers to a mitigation measure in **Section 3.3.3** to implement appropriate-height landscape buffers on all sides of Treasury’s proposed parcel, which would further reduce potential adverse impacts to the eagle nest.

Topical Area 7. Potential Impacts to Migratory Birds

Treasury corrected **Section 3.8** of this FEIS to state that over 200 migratory birds, not 12, have been identified on BARC. The reference in the DEIS to 12 migratory birds was intended to refer to Birds of Conservation Concern, specifically. Treasury also updated the FEIS to reflect the popularity of BARC, and Treasury’s proposed parcel, to local bird watchers.

Topical Area 8. Hazardous and Toxic Materials and Waste Procedures

Treasury revised the [Hazardous and Toxic Materials and Waste Technical Memorandum](#) to include a more thorough description of how Treasury manages HTMW at its facilities to minimize potential spills or discharges. These same practices would be implemented as part of the Proposed Action, in accordance with applicable federal and state requirements. Treasury also revised **Table 2.2-1** in this FEIS to note that it would develop and implement an SPCCP; Emergency Response Plan that complies with OSHA HAZWOPER and USEPA RCRA regulations; and a site-specific SWPPP for the proposed CPF to standardize and codify its HTMW protocols. Finally, Treasury revised **Section 3.13.2.2** of this FEIS to list fuels (e.g., diesel) as an example of the hazardous materials that would be stored on-site.

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Comment #	Comment # by Reviewer	Commenter ID#	Comment	Response to Comment Blue Shading: Change made to the FEIS. Green Shading: No change made to the FEIS.	Topic(s)	Name	Organization (if applicable)
Executive Summary							
1	6	016	Any revisions made to subsequent sections in response to comments should be reflected in the Executive Summary.	Comment noted. Revisions per other comments have been reflected in the Executive Summary of the FEIS, as applicable.	Executive Summary	Debbie McKinley	
Section 1.4 - Purpose and Need							
2	2	037	Purpose and Need Chapter 1.0 Purpose and Need for the Proposed Action, Section 1.1: The DEIS states that the expectation is for the need of currency notes in circulation to increase for the next 10 years. What is this expectation based on? What is the forecast for the currency circulation after the next 10 years? Is it expected to continue to increase, decrease or stay consistent?	Comment noted. This expectation was identified through interviews with, and resources from, the BEP and the Federal Reserve, which is the BEP's primary client. The basis for this expectation is described on pages 14-15 in the GAO report cited, available at: https://www.gao.gov/assets/700/691061.pdf . This basis includes analysis of cash demand between 2008-2016, the reliance of underbanked communities on cash, the common use of cash for small transactions, and the US dollar's role as a reserve currency throughout the world. A reliable forecast of cash demand beyond 10 years in the future cannot be determined. No change made to the FEIS.	Purpose and Need	Amanda Sigillito	MDE
3	4	037	Chapter 1.0 Purpose and Need for the Proposed Action, Section 1.4: Please elaborate on the statement "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". This is important because the Department requires avoidance and minimization of impacts to regulated resources. A multi-floor building could require less of a footprint on the ground and potentially minimize impacts to regulated areas.	Section 1.4 of the FEIS was revised with additional information supporting the Purpose and Need, in response to this comment. Please refer to Section 1.4 of the FEIS.	Purpose and Need	Amanda Sigillito	MDE
4	1	038	I feel that retrofitting the existing treasury with environmentally friendly fixtures will vastly reduce the environmental cost compared to constructing an entirely new facility. The CO2 emissions required for the bricks, mortar, glass, metal, and other construction materials is vastly underestimated. In addition, having a strong agricultural research department is very important with a growing population such as the United States'. BARC has already suffered sizeable land losses to the NASA Goddard facility, and losing more space will negatively impact their operations.	Section 1.3.2 of the FEIS was revised to note that even if the existing DC Facility were renovated, it would still face significant shortcomings as renovation would be heavily constrained by the structure and location of the existing buildings.	Purpose and Need	Joshua Carter	

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5	8	039	I. Purpose and Need Section 102 of the National Environmental Policy Act (NEPA) requires a federal agency to include a detailed statement on the environmental impacts of the proposed action, any adverse environment effects which cannot be avoided should the proposal be implemented, and alternatives to the proposed action. 42 U.S.C. § 4332(C). To comply with Section 102, an Environmental Impact Statement (EIS) must “briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives.” 40 C.F.R. § 1502.13 (2019); see also 40 C.F.R. § 1502.13 (2020). ¹ The Purpose and Need Statement sets the parameters for the range of alternatives that the agency will consider in the EIS. See Citizens Against Burlington, Inc. v. Busey, 938 F.2d 190, 195-96 (D.C. Cir. 1991). A Purpose and Need Statement must allow an EIS to be more than a “foreordained formality,” Id. at 196. Further, a Purpose and Need Statement premised on false or inaccurate information fails to provide a basis for “informed evaluation or a reasoned decision,” and therefore does not satisfy NEPA’s requirements. Sierra Club v. U.S. Army Corps of Eng’rs, 701 F.2d 1011, 1030 (2d Cir. 1983). NEPA requires that an EIS contain high-quality information and accurate analysis. See 40 C.F.R. §§ 1500.1(b), 1502.24 (2019); 40 C.F.R. § 1502.23 (2020).	Section 1.4 of the FEIS was revised to remove the screening criteria (e.g., sizes of CPF and parcel) from the Purpose statement and better explain how the Proposed Action would address the Need. The Need statement was revised to more clearly describe the deficiency of the existing DC Facility.	Purpose and Need	Holly Simmons City of Greenbelt
6	10	039	Additionally, the Need statement refers to the existing CPF as “obsolete” and unable “to support modern currency production”, but the 2018 Government Accountability Office (GAO) report Bureau of Engraving and Printing: Operations for and Costs of a Future Currency Production Facility, which is referenced throughout the DEIS, indicates that a renovation of the existing facility may address these issues, even if it is not the preferred alternative: “BEP officials have stated that if BEP does not receive [...] legal authority and funding, it will begin a renovation of the current D.C. facility.” Page 1. This indicates that the existing CPF is not operationally deficient.	Please refer to Responses to Comments 4 and 5.	Purpose and Need	Holly Simmons City of Greenbelt
7	12	039	II. The Future of Paper Currency The proposed Project is based on inaccurate paper currency demand assumptions, violating NEPA’s requirement that an EIS contain high-quality information and accurate analysis. See 40 C.F.R. § 1500.1(b) (2019). To substantiate a future need for paper currency, the main product of the CPF, the DEIS reports that the Federal Reserve predicts demand for cash will increase over the next decade; however, this prediction was reported in early 2018, and the CPF is not planned to be fully operational until 2029 – one year past the decade-long time horizon. Additionally, the basis for the Federal Reserve’s prediction is not provided. The GAO report in which this prediction is published does not substantiate the Federal Reserve’s prediction, but rather restates it. The GAO instead outlines the “several indications that currency demand will not substantially decline within the next decade [emphasis added]” in the United States. There are also those who believe paper currency is becoming obsolete. For example, in an interview on November 30, 2020, when asked about the payments landscape over the next decade, Gary Cohn, former Director of the National Economic Council and chief economic advisor to the President, stated “I think cash can easily disappear. The idea of paper currency in the legitimate world is becoming more and more obsolete, and I believe it can become totally obsolete.” Additional information regarding the demand for paper currency through the anticipated life of the Project should be included in the DEIS.	Comment noted. Treasury's Proposed Action is based on the best available data. Gary Cohn is not affiliated with Treasury and his opinions are his own. No change made to the FEIS.	Purpose and Need	Holly Simmons City of Greenbelt

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8	8	046	8. As economies evolve it appears evident that the need for paper money will substantially decrease as has occurred during the current pandemic. The future need for this facility may not even exist.	Comment noted. Please refer to Response to Comment 2. No change made to the FEIS.	Purpose and Need	Albert Klein	
PM-18	1	109	It was mentioned earlier that there's going to be a greater need for cash currency. And I just want to mention that Gary Cohn, Former Director of the National Economic Council, just said on Bloomberg TV yesterday, "I think cash can easily disappear. I mean, the idea of paper currency in the legitimate world is becoming more and more obsolete, and I believe it can become totally obsolete."	Please refer to Response to Comment 7.	Purpose and Need	John Lipart	Chair of the Greenbelt Green Team
Section 1.10 - Public Participation							
9	4	011	4) It seems like there are deliberate attempts to keep the voices of Greenbelt residents out of this process. The City Council, despite their efforts as the voice of the people, are given no say in the process. A stakeholder meeting in December 2019 was not publicized (maybe by intent), and despite COVID-19, the EIS timeline was not changed.	Treasury has been engaging with local government leaders concerning the Proposed Action since 2017. Comments and input received from the Greenbelt City Council, and all other members of the public, are being duly considered. Please refer to Section 1.10.1 of the EIS for a discussion regarding advertisement of the public scoping meeting held on December 3, 2019. A discussion of public engagement associated with the DEIS publication during the COVID-19 pandemic has been added to Section 1.10.3 .	Public Participation	Vijay Parameshwaran	
10	6	011	6) Because of COVID-19, this EIS process should be moved six months, so that we can participate more thoroughly in the review before pushing forward with this project.	Comment noted. Please refer to Response to Comment 9. No change in the project schedule is anticipated.	Public Participation	Vijay Parameshwaran	
11	2	039	Despite assertions in the DEIS that "public scoping comments are [...] addressed within each resource area discussion in the Draft EIS," the City finds that many concerns raised during the public scoping period have not been addressed. In many instances, the DEIS raises additional questions and concerns.	Comment noted. Scoping comments were considered and addressed in the DEIS. No change made to the FEIS.	Public Participation	Holly Simmons	City of Greenbelt
12	119	039	XXIII. Additional Concerns Concerns were raised during the December 2, 2020, virtual public webinar regarding the apparent lack of input from residents of Odell Road. Treasury should proactively engage the residents of Odell Road in the NEPA process by conducting effective outreach and providing meaningful opportunities for residents and owners to voice comments and concerns.	Comment noted. Treasury mailed stakeholder letters directly to each of the Odell Road residents on November 5, 2020 to advertise the DEIS' availability for public review and the then-upcoming public webinar. No change made to the FEIS.	Public Participation	Holly Simmons	City of Greenbelt

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13	1	040	Your report and attachments, though voluminous, were lacking in data, riddled with internal inconsistencies, and showed a deplorable lack of a consistent research methodology and analysis. If submitted in one of my University of Maryland classes, it would be graded as a D+. Specific issues: 1) Accessibility to the DRAFT EIS was limited to the web site making it a challenge for those with no to limited computer access due to closure of libraries due to COVID-19. It was also published in English only. This issue disproportionately impacts the predominantly minority and elderly population on properties that abut or are within 1/2 mile of the proposed BEP facility. When directly challenged during the public webex regarding accessibility and a suggestion that hard copies be placed in the open Department of Agriculture library in Beltsville, there was no response.	Comment noted. Treasury mailed a hard copy of the DEIS and associated Technical Memoranda directly to the Public Meeting participant who requested these data be provided in hard copy. Treasury will provide hard copies of the FEIS to local libraries and/or other public location(s), if feasible, based on COVID-19 restrictions at the time of publication. To date, Treasury has received no requests for Proposed Action materials to be translated into additional languages; however, based on concerns raised in DEIS comments, Treasury has published a Spanish-language translation of the FEIS Executive Summary. The DEIS NOA was advertised in the Washington Post, Greenbelt News Review, Prince George's Sentinel, and Beltsville News. Treasury also mailed letters and copies of the NOA to all stakeholders on the mailing list, developed from the scoping meeting and project-related public engagement initiatives. The NOA and newspaper advertisements identified methods by which the public could obtain hard copies of NEPA information. The Government made all reasonable attempts to disseminate information to concerned members of the public within COVID-19 limitations. Please see also Response to Comment 12. No change made to the FEIS.	Public Participation	Melissa Daston	
14	40	044	Public Involvement and Outreach As indicated in our comments, we encourage further communication with neighbors and stakeholders throughout facility design, construction, and operation. We recommend that the FEIS include a discussion of additional community outreach efforts, including whether a communication plan will be developed.	Section 3.12.3 of the FEIS was revised to include a recommended mitigation measure for Treasury to prepare a periodic newsletter containing updates of the Proposed Action. The newsletter would also contain Treasury contact information for stakeholders to contact Treasury regarding questions or concerns. This newsletter would be published online and mailed directly to individuals on the project mailing list, including members of the noted EJ communities, as appropriate.	Public Participation	Carrie Traver	USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
15	4	047	During the DEIS public hearing on December 2, 2020, commenters questioned why the adjacent Vansville community was not directly informed about the EIS process and specifically that hearing. The DEIS itself defines the Vansville residences along the north side of Odell Road as an "EJ" (environmental justice) community, yet no effort was specifically directed to engaging this community in the EIS process. The review of this DEIS is incomplete without real engagement with this adjacent community.	Please refer to Responses to Comments 12 and 13.	Public Participation	Benjamin Fischler	
16	5	048	Accessibility to the Draft EIS. During the December 2, 2020 Public Meeting, the project staff was asked repeatedly about how to receive hard copies of the reports, or at least to have the documents available at the Department of Agriculture library for residents who did not have access to on-line computers. No answers were provided.	Please refer to Responses to Comments 12 and 13.	Public Participation	Thomas E. Dernoga c/o Michelle Garcia	Prince George's County Council

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17	6	048	Residents from Odell Road and the historically African-American Vansville community were noticeably absent from the December 2, 2020 Public Meeting. When asked had they been individually contacted, the project staff response was that adequate public announcement of the meeting had been provided. Since these primarily minority communities are the most directly impacted by the proposed relocation of the BEP, it is a concern that they were not given additional notification and options on how to participate.	Please refer to Responses to Comments 12 and 13.	Public Participation	Thomas E. Dernoga c/o Michelle Garcia Prince George's County Council
18	18	048	Communications and Web Site. Based on constituent responses that we are still receiving, it is clear that continued dialog with regional residents should be part of the process. The posting of materials on the website is valuable but does not supersede the need for placing hard copies of the documents in the locally accessible Department of Agriculture library and holding more than one public meeting to replace personal meetings due to COVID-19 restrictions. This need was underscored during the December 2, 2020 Public Meeting during which the project staff was asked repeatedly about how to receive hard or have access to copies of the reports. No answers were provided.	Please refer to Responses to Comments 12, 13, and 14.	Public Participation	Thomas E. Dernoga c/o Michelle Garcia Prince George's County Council
19	19	048	Insufficient Outreach to Adjacent Residents. As noted above, the failure to do more extensive outreach to the bordering residents on Odell Road and the Vansville community raises environmental justice concerns. The consistent discounting of impacts to these communities in the Draft EIS underscored the dismissive attitude of the analysis on these primarily minority and elderly residents and may be interpreted as discriminatory behavior. I urge you to do further direct outreach to these communities and listen to their concerns regarding the relocation of the BEP to the BARC property.	Please refer to Responses to Comments 12, 13, and 14.	Public Participation	Thomas E. Dernoga c/o Michelle Garcia Prince George's County Council
20	11	054	Coordination Overall, staff understands the space requirements for this facility are significant and they limit the potential available sites in the NCR. The DEIS describes that BARC offered the only site that met the size requirements and was accessible to highways and airports. Given this a more intensive land use from the existing condition, we encourage the Department of Treasury and USACE to continue coordination with the local jurisdiction and adjacent neighborhood along Odell Road to identify additional mitigation measures to reduce the visual and transportation impacts.	Comment noted. Treasury has (since 2017) and continues to engage the local community regarding this Proposed Action. Please see also Responses to Comments 12, 13, and 14. Comments provided through this engagement, including comments received from stakeholders during the EIS scoping meeting and DEIS public review are being considered and incorporated into the design of the Proposed Action, as appropriate. As noted in Response to Comment 14, Treasury may issue a periodic Proposed Action newsletter to the surrounding community as a mitigation measure; this will be determined in the ROD. This newsletter would provide a mechanism by which the public could provide further feedback to Treasury. Please refer to Section 5.5 of the FEIS for the full list of recommended mitigation measures, updated pursuant to public comments received on the DEIS.	Public Participation	Carlton Hart NCPC

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21	5	056	Please set up communication levels with community involvement around you to discuss issues of concern with the community, especially traffic, hiking, biking, commuter busing, clean air and clean water. Please do not you set yourselves up as a stovepipe that is non-communicative with the surrounding neighborhoods and businesses. Please continue to have email lists and communication with the neighborhood advisory groups surrounding the agricultural center and city and county agencies. Please communicate closely with the elected local officials to take local concerns into account.	Please refer to Responses to Comments 12, 13, 14, and 20. Treasury will continue to consult with local governments and elected officials concerning the Proposed Action.	Public Participation	Jeanette Helfrich and John Rayner
PM-21	1	110	I'm not someone who's had the opportunity to see the Draft EIS, would wish a copy could be made available to me and anyone else who wanted one, or at least since the libraries are closed, one placed on BARC, maybe the library there where, in a safe setting, people could go and take a look at it on paper rather than on their small cell phone screen.	Treasury mailed a copy of the DEIS and associated Technical Memoranda to this commenter on December 4, 2020. Please also see Response to Comment 13.	Public Participation	Bill Orleans
PM-24	4	110	I would appreciate an answer to the question if maybe a hard copy can be placed in the library at BARC so that those of us who would like to make time to go read it there would have that opportunity; that is, if one can't be mailed to me.	Please refer to Response to Comment PM-21.	Public Participation	Bill Orleans
PM-25	1	103	This is not a comment on the EIS. But if I could make a short comment, I am surprised -- or I'm puzzled as to why there has not been any input from the residents of Odell Road, who would be among the most affected. I assume they have been apprised of this project. Have materials been sent to their homes? Well, I know that when we had a similar project, not as large, but proposed near my mother's home, she also got something in writing specifically telling here she was within X number of meters or yards of this project and she should be aware of it. I think you really need to do an outreach because it is a matter of environmental justice. It is in more low-income area, and I think, you know, possibly these people shouldn't be overlooked.	Please refer to Responses to Comments 12, 13, and 14.	Public Participation	Gail Mackiernan
PM-26	1	009	I second Gail's comment.	Please refer to Responses to Comments 12, 13, and 14.	Public Participation	Linda Saffell
Section 2.2 - Description of the Proposed Action						
22	1	007	Please be advised that the proposed facility will be subject to the Prince George's County mandatory referral process once the applicant is ready to submit for formal site plan approval. Please contact Prince George's Planning Special Projects Section for further information.	Comment noted.	Description of the Proposed Action	Brian Wilson M-NCPPC Planning Department, Prince George's County

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23	1	020	The U.S. Army Corps of Engineers, Baltimore District on behalf the U.S. Department of Treasury requests Clearinghouse review and endorsement of the BARC proposal for the construction of a new currency facility. As this is a Federally owned and operated property, the project is not subject to the county's local building and grading regulations. Additionally, M-NCPPC does not have regulatory jurisdiction over activities, development or otherwise, within the boundary of the property. Staff defers to Maryland Department of the Environment and U.S. Army Corps of Engineers to ensure that all state and federal regulations are being followed and meets the regulatory standards of the Clean Water Act.	Comment noted.	Description of the Proposed Action	c/o Sylvia Mosser M-NCPPC - Prince George's County
24	4	027	The DEIS is not clear about the energy sources to be used in the facility. The use of solar and geothermal should be prioritized. The DEIS should also include information on waste produced and how this waste will be managed at the facility. It should describe options for recycling, and specific processes to ensure that hazardous waste is kept separate from normal waste with appropriate safeguards in place for disposal, monitoring and tracking.	Comment noted. Section 2.2.1 of the FEIS lists sustainability features that Treasury would consider in the CPF's design, including rooftop solar panels. Hazardous waste is discussed in Section 3.13 of the FEIS and the Hazardous and Toxic Materials and Waste Technical Memorandum , including how Treasury proposes to manage hazardous waste. No change made to the FEIS.	Description of Proposed Action HTMW	Philip S. Aronson
25	117	039	XXII. Security and Facility Requirements The DEIS does not provide information regarding ISC security standards for the CPF. Materials referenced in the DEIS indicate that a facility risk assessment was conducted in 2015, and that requirements for integrated security have been previously analyzed. The security rating of the facility, explanation of the security rating, and a detailed list of applicable ISC security standards and CPF proposed security features (including setbacks and other relevant details), should be provided. Impacts of proposed security features should be accounted for in analyses. The DEIS would also benefit from an illustration of the anticipated space utilization, printing workflow, and components.	Comment noted. ISC requirements and anticipated space utilization were considered in detail in Treasury's Future Workplace Recommendations Report (2017) and Facility Feasibility Study (2017), and are being incorporated into the design of the proposed facility. Section 3.3 of the FEIS was revised to provide additional consideration of the proposed security fence's impact on visual resources.	Description of the Proposed Action	Holly Simmons City of Greenbelt
26	6	040	The new Federal mandate requires a minimum of an 80-foot security setback which is not met based on the houses located on Odell Road and the graphic you provided in the Draft EIS. The design also fails to incorporate the 3-1 parking enacted under the Carter Administration for all Federally owned facilities. With a population of 1,600 workers there should be less than 550 spaces or 1/3 of what is noted to be in compliance with Federal law. There was no mention of a visitor center, gift shop or tours to replace those currently given. I highlight of many visits to Washington DC. Will this require additional square footage and taking of more land?	The Proposed Action would comply with ISC Level IV security requirements; exact setback requirements vary based on several factors. The forested conservation easement along Odell Road that separates the proposed CPF from the property boundary is approximately 400 feet wide. Treasury is consulting with the NCPC regarding site parking requirements. Please refer to Response to Comment 30. Section 2.2.1 was revised to include a description of the public-facing features of the Proposed Action.	Description of the Proposed Action	Melissa Daston
27	8	044	We recommend that the layout for the facility be discussed in more detail in the Final EIS (FEIS), including the building size, location of the building and parking on the site, required setbacks and constraints, alternative layouts considered, and the alignment of the new entrance road from Powder Mill Road. As discussed under Water Resources, we recommend evaluation of alternatives that minimize impacts to Waters of the US.	Section 2.2.1 of the FEIS was revised to include the size of the building and additional information concerning security, GI/LID features, and public visitation of the Proposed Action. Please also refer to the Master Response provided under "Alternatives Screening Process" presented in Section 9.0 of the FEIS. Finally, please refer to Responses to Comments 274 and 275 regarding potential further avoidance of on-site wetlands.	Description of the Proposed Action	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment

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28	14	044	The DEIS indicates that Treasury intends to design the proposed CPF using architectural styles that minimize potential adverse impacts to the viewshed. However, the conceptual design shown in the Technical Memorandum appears to be a large, featureless industrial building. As the design progresses, we recommend sharing an updated concept with the public that shows the planned features that will allow it to be more compatible with the existing landscape.	Comment noted. Section 2.4.2 of the FEIS notes that the conceptual design is preliminary and subject to change as the design progresses. The FEIS does not include an updated concept design to avoid confusion and retain consistency throughout the EIS. Treasury is currently progressing the design of the proposed facility, and is incorporating features and styles that would further minimize viewshed effects/render the proposed facility more compatible with its surrounding landscape. Treasury revised Section 2.2.1 to note that interested stakeholders would be able to follow the design process through Treasury's public design submittals to the NCPC, including the tentative schedule (should Treasury select the Preferred Alternative for implementation in the ROD).	Description of the Proposed Action Cultural Resources / Viewshed	Carrie Traver	USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
29	34	044	Human Health and Safety We encourage efforts to improve pedestrian and bike access to the site and in the vicinity. Greenspaces, including bike paths, walking paths, and trails provide increased opportunities for active lifestyles as well as enhancing aesthetics and providing stormwater management benefits. Exposure to green space has positive physical and mental health benefits. We encourage maximizing opportunities to incorporate greenspace into the project area and surrounding areas to the extent feasible.	Comment noted. Treasury would consider incorporating green space into its campus during the design phase. Section 2.2.1 of the FEIS was revised to include Treasury's guiding principles for the preliminary design, one of which is "health, wellness, & safety." For security reasons, these on-site green spaces would only be accessible to Treasury personnel and registered visitors.	Description of the Proposed Action	Carrie Traver	USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
30	3	054	Transportation This project, as a new industrial use in this formerly agricultural land, will necessitate an increase in the number of vehicles using local and interstate roadways in Maryland. In addition, the Department of Treasury proposes a 1,179-space surface parking lot for its employees. Treasury has generally conducted a sound transportation analysis exploring impacts to local roads and highways from employees and deliveries. This analysis also describes parking capacity at this new facility in response to NCPC's parking ratio. The Transportation Element of the Comprehensive Plan identifies a parking ratio of one space for every two employees at facilities in the National Capital Region not near a Metrorail station, such as this proposed facility. The Department of Treasury is proposing a split parking ratio at this facility: (1) one space for each production facility employee and (2) one space per two administrative employees. The Comprehensive Plan allows deviations from the parking ratio guidelines, provided the applicant agency provides a strong rationale for the deviation. The Department of Treasury needs to request this parking ratio deviation when it submits the project for review.	Section 3.10.2.2 of the FEIS was revised to note that while Treasury's parking lot would exceed the NCPC's space limitations, Treasury is consulting with the NCPC to receive the necessary permissions to do so based on appropriate justification.	Description of the Proposed Action Traffic and Transportation	Carlton Hart	NCPC

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31	6	054	According to the DEIS, this project will convert 46 acres (of the 100-acre site) from institutional, agricultural, and forested land into industrial use with a large 1,179-space impervious surface parking lot. As such, the Department of Treasury should do everything it can to minimize overall impacts. The Transportation and Federal Environment Elements of the Comprehensive Plan include clear policies recommending structured or below grade parking on federal campuses to reduce impacts associated with an increased impervious surface area – namely the potential for greater stormwater runoff and a potential increase in the heat island affect. In addition, a 1,179-space surface parking lot is not a welcoming/attractive entrance to this new facility. We highly recommend the Department of Treasury include an option for structured/below grade parking and the following additional analysis in the DEIS: a comparison of environmental impacts including heat island, impervious surface, tree removal, and stormwater runoff related to a surface lot versus structured/below grade parking.	Comment noted. Treasury determined that use of structured parking would conflict with site security requirements. Structured or below-grade parking would also be substantially more expensive than surface lots. Treasury intends to use vegetation and GI/LID throughout the parking lot to improve stormwater management, heat reflection, and aesthetics. Please also refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS.	Description of the Proposed Action	Carlton Hart	NCPC
32	9	054	Natural Resources The DEIS describes existing conditions and proposed impacts regarding natural resources. We appreciate that the Department of Treasury and USACE developed and included tree and wildlife inventories for the proposed new CPF site. This facility will require the removal and the replacement of onsite trees. We would remind Treasury to make sure to review and follow the newly updated Tree Replacement policies in the Federal Environment Element of the Comprehensive Plan. In addition, we appreciate the DEIS describing how the building will include sustainable design strategies by attaining a LEED silver rating, installing rooftop solar panels as an alternative energy source, and meeting Section 438 of EISA using green infrastructure/low impact development measures on the campus. All these measures are supported by the Federal Elements of the Comprehensive Plan.	Comment noted. Table 1 of the Biological Resources Technical Memorandum was updated to include the NCPC Comprehensive Plan, and the Federal Environment Element specifically. Table 2.2-1 of the FEIS was revised to state that the Proposed Action would incorporate the NCPC's tree canopy and tree replacement policies to the maximum extent practicable.	Description of the Proposed Action Biological Resources	Carlton Hart	NCPC
Section 2.2.4 - Environmental Impact Reduction							
33	1	015	The Anacostia Watershed Society (AWS) is working to restore the Anacostia River to Swimmable and Fishable. Land use and management, transportation, and community impacts are areas that we are focused on to accomplish our mission. AWS appreciates the opportunity to submit these comments for review and your consideration. We are presenting comments to the proposed project that will happen in the Anacostia watershed. It is our belief that, while the impacts as presented can and should be mitigated, there is an overarching diminishment of the BARC that is not accounted for in any review. We ask that building design, transportation, and community impacts be minimized and attenuated at every decision point. Sustainable, resilient, inclusive best practices must be part of the long-term design and management of the site and operations. This project is proposed for a site previously developed as a research farm and that fact is positive compared to developing undisturbed forest land. The site does not appear to be utilized currently and seems to have reverted to meadow, some forest, and wetlands in the times since operations there ceased. While the land was impacted by past practices it does retain its agricultural connections and there are some cultural resources connected to the history and viewshed. Constructing this project will impact those resources that no mitigation will compensate for.	Comment noted. Treasury seeks to avoid, reduce, and mitigate potential adverse effects to the extent practicable, and has identified EPMS, RCMs, BMPs, and mitigation measures to achieve that end (please see Table 2.2-1 and Section 5.5 in the FEIS, respectively). Treasury would also seek to design the proposed CPF to incorporate sustainability features; Treasury anticipates the facility would be rated as LEED Silver (see Section 2.2.1 of the EIS). No change made to the FEIS.	Environmental Impact Reduction Mitigation Measures	James Foster	Anacostia Watershed Society (AWS)

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Comment #	Comment # by Reviewer	Commenter ID#	Comment	Response to Comment Blue Shading: Change made to the FEIS. Green Shading: No change made to the FEIS.	Topic(s)	Name Organization (if applicable)
34	120	039	Site design elements such as lighting and fencing must be designed in a context-sensitive manner to not further degrade wildlife, vegetation, and the human environment (e.g., the residences along Odell Road), etc., and to not impact any nearby research projects being conducted at BARC. Additionally, fencing must avoid impact to the movement of wildlife.	Comment noted. Please refer to Table 2.2-1 and Section 3.3.3 in the FEIS for a list of the EPMs/RCMs and recommended mitigation measures related to lighting and fencing. No change made to the FEIS.	Environmental Impact Reduction	Holly Simmons City of Greenbelt
35	3	044	We recognize that Treasury has evaluated measures to reduce impacts; we appreciate the incorporation of Environmental Protection Measures (EPMs), Regulatory Compliance Measures (RCMs), and Best Management Practices (BMPs) to reduce environmental effects. We also appreciate the commitment to obtain a Leadership in Energy and Environmental Design (LEED) rating of Silver for the building. We recommend consideration of additional or expanded measures and specific commitments to reduce potential effects and address local concerns. A number of opportunities exist to reduce the impact of the facility in the landscape; while the EIS indicates that sustainable features will be evaluated for building design, (such as rainwater harvesting system for reuse, rooftop solar panels, and high efficiency systems) additional details and commitments would be helpful. A few suggestions include: restoring additional habitat onsite; sharing conceptual designs that reduce visual effects with the residents in the Region of Influence; reducing the footprint of impervious areas; committing to measures to improve bike and pedestrian access; and ensuring minimal noise and light intrusion outside the site from the facility. Please see additional comments in the attached enclosure.	Particular sustainability features would be determined during the design process. Please refer to Section 2.2.1 , Table 2.2-1 , and Section 5.5 in the FEIS for the updated description of the proposed action design, list of EPMs/RCMs, and list of recommended mitigation measures.	Environmental Impact Reduction	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
36	35	039	While the No Build Alternative is preferable, if the Preferred Alternative is pursued, the project should restore and/or enhance the current environmental features on the proposed site and/or mitigate CPF construction and operation through the acquisition and preservation of a comparably sized property in areas of the County currently slated for development. Additionally, the entire site should be buffered with vegetation in accordance with requirements of the Prince George’s County Landscape Manual, to ease transition between the existing residential and agricultural uses and the incompatible industrial use and to ensure the maintenance of a cohesive landscape to the maximum extent possible.	Treasury does not currently plan to acquire and preserve off-site property in Prince George's County. Section 3.2.3 of the FEIS was revised to reference a mitigation measure added to Section 3.3.3 to establish landscape buffers on all sides of Treasury's proposed parcel; this mitigation measure would apply to both visual resources and land use.	Environmental Impact Reduction Land Use	Holly Simmons City of Greenbelt
37	48	039	Security fencing not adequately addressed. One of the mitigation measures proposed for impacts to Visual Resources is to “Ensure the permanent security fencing around the perimeter of the proposed CPF blends with the natural surroundings to the extent possible and does not present an obtrusive, visually distracting, discordant visual impact with the ROI [Region of Influence]. Use fencing that resembles residential fencing and does not appear threatening to adjacent viewers.” While the City agrees that impacts resulting from security fencing should be mitigated, the DEIS does not provide information on ISC fencing requirements and Treasury’s proposed fencing, and it fails to evaluate the visual impacts of security fencing. Requirements for fencing (height, materials, security features, etc.) should be outlined and included in the evaluation of visual impact. Security fencing should be shown in renderings provided in the Visual Resources Technical Memo. The “extent possible” to which fencing will be able to blend in with the natural surroundings should be identified and accounted for. At a minimum, the proposed mitigation should be revised to include “Consult with adjacent property owners along Odell Road to ensure fencing does not appear threatening to adjacent viewers” and included in the DEIS as an EPM.	The security fence has not yet been designed, and may take several forms depending on its visibility from off-site areas. Section 2.2.1 of the FEIS was revised to provide additional description of the security fence. Additionally, Section 3.3.2.2 of the FEIS was revised to include the security fence in the discussion of significant adverse impacts to the residences along Odell Road, and to mention that Treasury would consider installing plantings adjacent to the fence line to provide a more natural aesthetic. Please also refer to Response to Comment 25.	Environmental Impact Reduction Visual Resources	Holly Simmons City of Greenbelt

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38	49	039	Landscape, forest conservation, and vegetative buffering not included. To minimize visual impacts, the Proposed Action incorporates retention and enhancement of existing landscape buffers (i.e., topography and vegetation) around the periphery of Treasury’s proposed parcel “to obscure it from adjacent areas and maintain visual resources for off-site locations”; however, the DEIS does not include a landscape plan, a forest conservation plan, or any specific information pertaining to enhanced/additional vegetative buffering. Two forest conservation easements (FCE) exist along the northern portion of the site, but the LOD shown in the DEIS appears to disturb the FCE to the northeast. Forested areas to the east, which were included in the forest stand delineation and appear to have been previously included in the project area, may be subject to retention and preservation under the Maryland Forest Conservation Act if included in the site; however, they are no longer shown as part of the project site. No vegetative buffering appears to be proposed along the western and southern site boundaries.	A landscape plan and FCP would be developed during the design phase. The forest conservation easements could be minimally impacted by construction of the security fence; this disturbance would be coordinated with the MDNR during preparation of the FCP. Please also refer to Responses to Comments 36 and 39.	Environmental Impact Reduction Visual Resources	Holly Simmons City of Greenbelt
39	50	039	Prince George’s County Master Plan of Transportation and Landscape Manual not included. Conformance to the Prince George’s County Master Plan of Transportation, and to the Prince George’s County Landscape Manual should be incorporated into the Proposed Action as an EPMs, RCMs, or BMP. To minimize visual impacts, landscape buffers should be installed on all sides of the facility, and should include a mixture of native canopy and understory trees and herbaceous cover to ensure full screening. A variety of fast-growing and slow-growing species could be used to facilitate short- and long-term screening.	Section 3.3.3 of the FEIS was revised to include a mitigation measure to establish landscape buffers, including vegetation, on all sides of Treasury's proposed parcel to the extent practicable while still meeting site security requirements. Treasury would review and consider the Prince George's County Landscape Manual and Prince George's County Master Plan of Transportation during the design process. Please also refer to Responses to Comments 36 and 38.	Environmental Impact Reduction Visual Resources	Holly Simmons City of Greenbelt
40	13	044	Visual Resources As discussed, the introduction of the proposed CPF may have potentially significant adverse impacts to visual resources for residences along Odell Road and less-than-significant adverse impacts on visual resources from roadways with implementation of EPMs. We concur that mitigation measures as outlined in 3.3.3 and the EPMs in Section 2.2.4 should be implemented to reduce effects during both day and nighttime, including reducing the visual impacts from the security fencing, an exterior lighting plan that minimizes off-site light pollution, retention and enhancement of existing landscape buffers, and a design that selects materials and colors that blend with the existing visual landscape, consistent with input from cultural resource agencies.	Comment noted.	Environmental Impact Reduction Visual Resources	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
41	7	016	(Table 2.2-1, Air Quality, Construction) For completeness, water spray should also be used to minimize fugitive dust emissions.	Table 2.2-1 in the EIS was revised to include the use of water spray to control fugitive dust emissions during construction, as appropriate.	Environmental Impact Reduction Air Quality	Debbie McKinley
42	8	016	(Table 2.2-1, Air Quality, Operation) For completeness, air emissions control equipment installed to reduce emissions of metals, volatile organic compounds (VOCs), greenhouse gasses, and other constituents should be addressed.	Comment noted. Treasury currently uses various emissions control processes/equipment, and often implements new and improved emissions controls (e.g., see second bullet for Air Quality Operation in Table 2.2-1). These controls would ensure compliance with Treasury's operational air quality permits for the proposed CPF (see third bullet for Air Quality Operation in Table 2.2-1). A detailed listing of such processes/equipment is extraneous for this EIS; controls used would ensure attainment of required emissions levels. No change made to the FEIS.	Environmental Impact Reduction Air Quality	Debbie McKinley

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43	2	056	Please conserve the environment and do your best to promote clean water and clean air. When I worked downtown for 25 years at DOE, I often walked near your plant and I could smell the ink (not unpleasant) but I hope you will do your best to not pollute the air from your ink and paper products.	Comment noted. Treasury would minimize potential water and air quality impacts to the extent practicable and comply with all applicable laws and regulations. Please refer to Sections 3.7 and 3.4 of the FEIS, respectively, for further information. No change made to the FEIS.	Environmental Impact Reduction Air Quality	Jeanette Helfrich and John Rayner
44	9	016	(Table 2.2-1, Noise, Construction, Last Bullet) For clarity, the meaning of “off-site” as used in the context in which this term is used in the sentence should be explained. Does offsite mean beyond Beltsville Agricultural Research Center (BARC) boundaries? For completeness, the term “off-site” should be clarified.	The term "off-site" is used consistently throughout the EIS to refer to locations outside of the Project Site. No change made to the FEIS.	Environmental Impact Reduction Noise	Debbie McKinley
45	10	016	(Table 2.2-1, Noise, Construction, Last Bullet) It would appear that requiring construction-related heavy trucks to access the Project Site through BARC would increase impacts to noise-sensitive receptors on BARC. For completeness, the best management practices (BMPs) that will be employed to minimize impacts to noise-sensitive receptors on BARC itself should be addressed. Note: This comment assumes the term “off-site” means beyond BARC boundaries.	This EPM was revised to apply to non-federal noise-sensitive receptors, which are a higher priority for impact reduction than the federally operated BARC buildings.	Environmental Impact Reduction Noise	Debbie McKinley
46	11	016	(Table 2.2-1, Noise, Operation, First Bullet) For clarity, the meaning of “off-site” as used in the context in which this term is used in the sentence should be explained. Does offsite mean beyond BARC boundaries? For completeness, the term “off-site” should be clarified.	Comment noted. Please refer to Response to Comment 44.	Environmental Impact Reduction Noise	Debbie McKinley
47	12	016	(Table 2.2-1, Noise, Operation, First Bullet) It would appear that requiring operation-related heavy trucks to access the Project Site through BARC would increase impacts to noise-sensitive receptors on BARC. For completeness, the BMPs that will be employed to minimize impacts to noise-sensitive receptors on BARC itself should be addressed Note: This comment assumes the term “off-site” means beyond BARC boundaries.	Comment noted. Please refer to Response to Comment 45.	Environmental Impact Reduction Noise	Debbie McKinley
48	13	016	(Table 2.2-1, Noise, Operation, Last Bullet) For completeness, the BMPs that will be employed to reduce or avoid interior noise should be identified.	While specific interior noise-reduction methods would be determined during the design phase of the Proposed Action, Treasury revised Table 2.2-1 to include EPMs/RCMs to design the proposed CPF to include a noise abatement strategy (e.g., use of baffles, absorbing materials, and vibration control) to reduce interior noise from currency production, and to implement an OSHA-compliant hearing conservation program if interior noise levels exceed regulatory standards. Table 2 of the Noise Technical Memorandum was revised to include OSHA noise regulations.	Environmental Impact Reduction Noise	Debbie McKinley

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49	14	016	(Table 2.2-1, Geology, Topography, and Soils, Construction) It is not clear from the information presented how the stormwater management activities discussed will reduce potential adverse environmental impacts on the geology and topography on the project site. For completeness, the Environmental Protection Measures (EPMs) that will be undertaken to reduce potential adverse environmental impacts resulting from altering the geology and topography of the Project Site should be addressed.	Comment noted. The stormwater EPMs and RCMs identified would reduce potential adverse soil impacts. No EPMs or RCMs regarding geology or topography would be necessary; thus, none are included or proposed. No change made to the FEIS.	Environmental Impact Reduction Topography and Soils	Debbie McKinley	
50	15	016	(Table 2.2-1, Geology, Topography, and Soils, Operation) For completeness, the EPMs that will be undertaken over the life of the project to minimize erosion and sedimentation from the revegetated areas should be addressed.	Comment noted. Revegetation of disturbed areas, and the long-term maintenance of this vegetation, would minimize or avoid erosion and sedimentation. Erosion and sedimentation from re-vegetated areas is not anticipated to occur. No change made to the FEIS.	Environmental Impact Reduction Topography and Soils	Debbie McKinley	
51	2	015	From the USACE presentation of impacts: Every effort should be made to avoid these impacts and only then mitigate at minimum of 3-5 times. •Diversion or fill of approximately 226 linear feet of stream (potentially significant adverse impact) Our streams have been grossly impacted in the Anacostia. •Permanent fill of 0.94 acre of wetlands and 0.65 acre of wetland buffer. Existing wetlands are very important to a healthy river. •Potential increased stormwater volume and runoff, sedimentation, and soil contamination. AWS is working everyday to stop pollution and requests a stronger response for any impacts to water quality. •Discharge of wastewater to local treatment plant. Discussed further below.	Comment noted. Treasury would design the Proposed Action to avoid impacts to water resources to the extent practicable. Where avoidance is not practicable, Treasury would implement the EPMs and RCMs identified in Table 2.2-1 in the EIS (including all applicable permitting and mitigation required by regulation) to minimize potential impacts. Finally, Treasury identified recommended mitigation measures in Section 3.7.3 of the EIS that would be considered to further reduce potential adverse water resources impacts. No change made to the FEIS.	Environmental Impact Reduction Mitigation Measures Water Resources	James Foster	Anacostia Watershed Society (AWS)
52	16	016	(Table 2.2-1, Water Resources, Construction, Seventh Bullet) It appears “or” should be “on” in this sentence. Please correct.	Comment noted. Typo corrected.	Environmental Impact Reduction Water Resources	Debbie McKinley	
53	17	016	(Table 2.2-1, Water Resources, Construction) For completeness, the BMPs that will be employed to maintain the existing hydrologic function of the wetland in the southeast corner of the Project Site to the extent practicable should be addressed.	Comment noted. The second bullet of Table 2.2-1 for Water Resources Construction identifies that Treasury would obtain and adhere to appropriate permits from USACE and MDE with respect to CWA compliance. The specific BMPs and permit conditions would be determined during the permitting process; these requirements would ensure maintenance of wetland hydrologic functions. No change made to the FEIS.	Environmental Impact Reduction Water Resources	Debbie McKinley	
54	18	016	(Table 2.2-1, Water Resources, Operation) For completeness, the EPMs that will be undertaken to maintain the existing stream flow and hydrologic function of the stream over the life of the project should be addressed.	Comment noted. "Stormwater management features" incorporated into the proposed facility design (further discussed in a Master Response in Section 9.0 of the FEIS), as well as maintenance of applicable stormwater permits (see first bullet of Water Resources Operation in Table 2.2-1), would maintain the hydrologic function of the existing stream. Otherwise, operation of the proposed facility would not impact the on-site stream (see Section 3.7.2.2 of the FEIS). No change made to the FEIS.	Environmental Impact Reduction Water Resources	Debbie McKinley	

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55	19	016	(Table 2.2-1, Water Resources, Operation) For completeness, the EPMs that will be employed to maintain the existing hydrologic function of the wetland in the southeast corner over the life of the project should be addressed.	Comment noted. No impacts to this wetland are anticipated during operation of the proposed facility (see Section 3.7.2.2 of the FEIS). Therefore, the hydrologic function of this wetland would remain unchanged. See also Response to Comment 53. No change made to the FEIS.	Environmental Impact Reduction Water Resources	Debbie McKinley	
56	20	016	(Table 2.2-1, Water Resources, Operation) For completeness, the BMPs that will be employed to manage and reduce pollution flowing from the Project Site into the Chesapeake Bay and its tributaries over the life of the project should be addressed.	Comment noted. Sample stormwater control BMPs as identified in EO 13508 are noted in Table 1 of the Water Resources Technical Memorandum . As stated in Table 2.2-1 of the FEIS, these BMPs would be incorporated into the Proposed Action during construction; as applicable, these BMPs would be maintained over time as part of the proposed facility. No change made to the FEIS.	Environmental Impact Reduction Water Resources	Debbie McKinley	
57	21	016	(Table 2.2-1, Water Resources, Operation) For completeness, the BMPs that will be employed to maintain any detention or retention ponds and green infrastructure/low-impact development (GI/LID) techniques such that they function optimally over the life of the project should be addressed.	Comment noted. The stormwater management infrastructure, including GI/LID, would be considered part of the proposed facility and maintained over time accordingly. No change made to the FEIS.	Environmental Impact Reduction Water Resources	Debbie McKinley	
58	23	016	(Table 2.2-1, Water Resources, Operation) For completeness, the BMPs that will be employed to stay within the design capacity of the BARC East WWTP over the life of the project should be addressed.	Comment noted. These methods would be detailed during the design phase in Treasury's agreement with the USDA to utilize the BARC East WWTP to treat its wastewater. The USDA would continue to monitor and maintain the operation of the WWTP within its design capacity and in compliance with its MDE permit. No change made to the FEIS.	Environmental Impact Reduction Water Resources	Debbie McKinley	
59	24	016	(Table 2.2-1, Water Resources, Operation) For completeness, the EPMs that will be employed to conserve, reuse, and recycle potable water supplied by WSSC to the central chilled water and hot water plant over the life of the project should be addressed.	Please refer to Response to Comment 60.	Environmental Impact Reduction Water Resources	Debbie McKinley	
60	56	039	Additional EPMs should be considered. While the No Action alternative is preferable, if the CPF proceeds to final design and engineering, as an additional EPM, Treasury should implement use of gray water systems onsite to minimize wastewater. Impact to these streams and wetland should be avoided.	Section 2.2.1 of the FEIS was revised to state that non-potable greywater reuse is a sustainability feature that Treasury would evaluate for incorporation in the proposed CPF's final design.	Environmental Impact Reduction Water Resources	Holly Simmons	City of Greenbelt

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61	4	052	Section 3.7.2.2 of the EIS, under Wetlands, claims that the Treasury has developed the concept site plan for the CPF in a manner that reduces potential adverse wetland impacts to the extent feasible. Table 2.2-1 which discusses environmental impact reduction procedures for water resources, however, fails to address how wetlands will be protected from fugitive dust emissions during construction of the proposed CPF. Line 1477-78 states that fugitive dust emissions would be the most likely emissions source to travel off-site. Considering Wetland #4 and Wetland #6 are within project-site boundaries, it is highly likely fugitive dust emissions will contaminate these bodies of water. This poses a hazard as increased sedimentation would alter the nutrient makeup of water as well as threaten the biomass of these wetlands. Given the construction process will occur over a period of three years, what further environmental protection measures can be put in place to mitigate the amount of fugitive dust that will settle onto these wetlands during the construction phase?	Please refer to the Air Quality row of Table 2.2-1 in the FEIS for EPMS related to minimizing fugitive dust emissions. Minimization of fugitive dust emissions would simultaneously minimize the potential for fugitive dust to enter wetlands. No change made to the FEIS.	Environmental Impact Reduction Water Resources	Kobe Ramirez c/o Julian Grauer Environmental Review, Inc.
62	26	016	(Table 2.2-1, Biological Resources, Operation) For completeness, the EPMS that will be employed to maintain the biological health and function of the existing stream and southeast corner wetland over the life of the project should be addressed.	Comment noted. Please refer to Responses to Comments 53 - 56.	Environmental Impact Reduction Biological Resources	Debbie McKinley
63	74	039	Further EPMS should be considered by Treasury to ensure maximum protection of priority forest and specimen trees, as follows: Modify the LOD associated with proposed entrance road upgrades and the proposed vehicle entry control facility to avoid diverting approximately 117 linear feet of the unnamed intermittent stream on-site, and to avoid removal of the maximum number of specimen trees in 'Very Good' and 'Good' condition.	Comment noted. Modification of the LOD to avoid this intermittent stream is identified as a recommended mitigation measure in Section 3.7.3 of the FEIS. Treasury would strive to minimize removal of specimen trees throughout the design process; however, due to space constraints where the proposed entrance road enters Treasury's proposed parcel, it would be difficult to retain specimen trees in that location. No change made to the FEIS.	Environmental Impact Reduction Biological Resources	Holly Simmons City of Greenbelt
64	85	039	Possible impacts to migratory birds are not addressed sufficiently. The DEIS notes that USFWS identifies 12 migratory birds with potential to occur on the project site, eight of which have specifically been reported within the designated ROI for Biological Resources. These birds are also considered Birds of Conservation Concern by the USFWS. The DEIS makes claims such as "most [migratory] birds would likely avoid the Project Site or relocate to nearby habitat areas on BARC, in the ROI, or regionally", but provides little evidence to support such claims. Adverse impacts to migratory bird populations must be fully incorporated into the DEIS, including potential for bird migration to be impacted by additional light pollution and for migratory bird deaths to increase due to window strikes. While the No Action Alternative is preferable, if the BARC site is chosen, Treasury must commit to two revised EPMS: a. "Limit or avoid all construction (e.g., tree removal or noise-intensive activities) within the nesting season of migratory birds observed on the Project Site (i.e., May 1 to September 10) to the extent possible." b. "Using the LEED framework, evaluate the need for Implement design measures to reduce the likelihood of bird mortality from window strikes, including such as patterns on glass windows and use of non-reflective windows."	Please refer to the Master Response provided under "Potential Impacts to Migratory Birds" in Section 9.0 of the FEIS. The Commenter's proposed revisions to EPMS were reviewed by Treasury, but were not incorporated.	Environmental Impact Reduction Biological Resources	Holly Simmons City of Greenbelt

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65	8	052	Table 2.2-1 of the EIS states construction should be limited or avoided altogether within the nesting season of migratory birds observed between May 1 to September 10. Section ES.8, however, states that excavation activities will be conducted during late summer or early fall to minimize potential encounters of groundwater resources. As these two timelines are contradicting, how will excavation activities be limited to avoid disturbing migratory birds to the furthest extent possible? According to 3.7.2.2, excavation activities could potentially reach up to a depth of approximately 25 feet involving the demolition of existing buildings with basements and removal of underground utilities. These activities will likely involve use of loud construction vehicles and machinery which may cause large disturbance for migratory birds. The only E and T species identified in the area is the Northern Long Eared Bat. These chiroptera mammals are very sensitive to loud noises also.	The mitigation measure to conduct excavation activities when the groundwater table is seasonally lower was eliminated in the FEIS as this mitigation measure was redundant with an existing EPM designed to minimize potential impacts to this resource (see Table 2.2-1). The existing EPM adequately addresses potential groundwater impacts during any season. Treasury would limit or avoid site clearance activities during the migratory bird nesting season.	Environmental Impact Reduction Biological Resources Water Resources	Kobe Ramirez c/o Julian Grauer	Environmental Review, Inc.
66	99	039	Truck traffic to be routed along Edmonston Road. One of the EPMs, RCMs, and BMPs to address traffic impacts is to require trucks to follow existing truck restrictions on various roadways. It further instructs, "Truck traffic should be routed along Powder Mill Road, Edmonston Road/Kenilworth Avenue, and the Capital Beltway to minimize its use of collector and local roads." The City is concerned this may have an adverse impact on Edmonston Road.	Comment noted. Treasury studied nine intersections along Edmonston Road/Kenilworth Avenue in its Transportation Impact Study. Please refer to Section 3.10 of the FEIS for a discussion of the findings, potential adverse impacts, and recommended mitigation measures. No change made to the FEIS.	Environmental Impact Reduction Traffic and Transportation	Holly Simmons	City of Greenbelt
67	27	016	(Table 2.2-1, Utilities, Construction) For completeness, the Miss Utility requirements to give notice at least two full business days prior to the day work is to begin should be addressed.	Comment noted. Treasury would consult directly with utility providers given the nature of utility work required for this Proposed Action. No change made to the FEIS.	Environmental Impact Reduction Utilities	Debbie McKinley	
68	28	016	(Table 2.2-1, Utilities, Operation) For completeness, the Miss Utility requirements to give notice at least two full business days prior to the day work is to begin should be addressed.	Comment noted. Operation of the Proposed Action would not require additional utility work. No change made to the FEIS.	Environmental Impact Reduction Utilities	Debbie McKinley	
69	31	016	(Table 2.2-1, Hazardous and Toxic Materials and Waste, Operation) For completeness, the specific BMPs and RCMs that will be employed to reduce the generation of HTMW over the life of the project should be identified.	Comment noted. HTMW reduction efforts would be completed in accordance with Treasury initiatives. Please refer to BEP's Environmental Management System Business Policy; Treasury referenced this policy in Table 2.2-1 of the FEIS via a hyperlink.	Environmental Impact Reduction HTMW	Debbie McKinley	
70	32	016	(Table 2.2-1, Hazardous and Toxic Materials and Waste, Operation) For completeness, the specific BMPs and RCMs that will be employed to recycle HTMW over the life of the project should be identified.	Comment noted. This specific information is not relevant to Table 2.2-1 of the FEIS. No change made to the FEIS.	Environmental Impact Reduction HTMW	Debbie McKinley	
71	37	016	(Table 2.2-1, Human Health and Safety, Construction) For completeness, the BMPs and RCMs associated with the Occupational Safety and Health Administration (OSHA) compliance should be addressed or the text revised to clarify that the actions presented will comply with OSHA.	Comment noted. A bullet on OSHA compliance during construction activities has been added to Table 2.2-1 of the FEIS.	Environmental Impact Reduction Human Health and Safety	Debbie McKinley	

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72	38	016	(Table 2.2-1, Human Health and Safety, Construction) For completeness, the need for environmental monitoring and associated BMPs and RCMs that will be implemented should be addressed.	Comment noted. The need for environmental monitoring would be determined during the permitting processes for other environmental resources and would generally not be relevant to human health and safety beyond the EPMs/RCMs already identified. No change made to the FEIS.	Environmental Impact Reduction Human Health and Safety	Debbie McKinley	
73	39	016	(Table 2.2-1, Human Health and Safety, Operation) For completeness, the BMPs and RCMs associated with OSHA compliance over the life of the project should be addressed or the text revised to clarify that the actions presented will comply with OSHA.	Comment noted. A bullet on OSHA compliance during operational activities has been added to Table 2.2-1 of the FEIS.	Environmental Impact Reduction Human Health and Safety	Debbie McKinley	
Section 2.3 - Alternatives Screening Process							
74	1	004	We are strongly opposed to the Bureau of Engraving and Printing constructing their 1,000,000 square foot facility within the boundary of the Beltsville Agricultural Research Center. Prince Georges and Montgomery County Maryland have many declining and / or abandoned shopping centers and shopping malls that would be much more suitable for this type of project and wouldn't destroy our much valued and ever dwindling green space. As examples: the former Landover Mall area, the seldom used overflow parking areas for Fedex field, Forestville Plaza Shopping Center, Iverson Mall, Beltsville Industrial Park, Westfield Wheaton Mall, White Oak Shopping Center (Sears). It would be very much preferred to re-purpose some of these declining and obsolete built upon areas as opposed to destroying more of our precious green space.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	Jeff and Diane Goldman	
75	1	009	Please acknowledge receipt and attentive reading of this comment. I see NO evidence of consideration with local input of alternative sites such as the OFTEN-mentioned old Landover Mall location. I note that several good local comments and even good federal agency comments are without official project responses, which tells us a great deal about the nature of the project as a whole.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	Linda Saffell	
76	2	009	A BARC site location fails in so many ways: adds to existing transportation problems; negatively impacts irreplaceable natural resources; radically alters the nature of the site and surrounding communities both human and non-human; and the process appears (from the OUTSIDE) to have been largely devoid of consideration of real community engagement or dialogue. It is NOT too late or too far along in development to reconsider this project and I urge same.	Comment noted. Through the DEIS, Treasury conducted a thorough analysis of potential impacts (adverse and beneficial) that could result from the Proposed Action. Treasury has identified numerous EPMs and RCMs that would be implemented as part of the Proposed Action to proactively reduce or avoid potential adverse impacts. Where feasible, Treasury has also identified additional mitigation measures it would consider implementing to further reduce potential adverse impacts of the Proposed Action. Treasury has been engaging with local governments concerning this Proposed Action since 2017, and conducted a Public Scoping Period to solicit public input from November 15 to December 15, 2019. No change made to the FEIS.	Alternatives Screening Process	Linda Saffell	

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77	1	010	I strongly oppose this project. The purpose and need for the project is clear but building on a greenfield rather than an urban redevelopment site near transit is not responsible. It defies common sense. The dismissal of other federally owned lands as potential sites based on the reasons cited indicates that the "unwillingness" of other federal agencies to assist the Treasury in finding an appropriate site is the primary reason this facility is being plopped into the green heart of PG and Anne Arundel County.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	Carolyn Mitchell	
78	2	010	This project will have a permanent impact on the region (including downstream and adjacent Anne Arundel County). The minimum size for the land required is not based on an efficient design concept but on the sprawling Western Currency Production Facility, which did not have the same site constraints as the National Capital Region. Any building can be designed in multiple ways to reduce its footprint if the will is there. A site that is near transit could also do with less on-site parking. Any innovative thinking at all could have proposed a more compact solution that would make the minimum site size criteria less rigid. The same process that the FBI HQ relocation used to allow multiple sites to compete with design solutions would have resulted in a less lazy solution that does not have the destructive potential of this project. This project sets a cataclysmic precedent for land use change for Federal land that is for protection of biodiversity. Faced with climate change, we cannot afford to transform rural land with industrial redevelopment. The Treasury could certainly have tried harder to make a more appropriate site work instead of dismissing all but one site as "unreasonable" options. This is a very flawed process. This NEPA action is perfunctory and should be scrapped and redone with some of the "considered but dismissed" options included in the EIS.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process Description of the Proposed Action	Carolyn Mitchell	
79	5	011	5) A proper laboratory facility/site that has the infrastructure and controls to handle chemical processing should be chosen, not a pristine agricultural site. There are industrial park areas in PG County that would be more ideal candidates, and would provide a lot more oversight.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	Vijay Parameshwaran	
80	5	015	What we see time and again is the ease of land transfer from BARC to other federal facilities that does not consider the cumulative impact of the "thousand cuts" resulting from each discreet development. There is no mechanism except better planning to reduce this. Frankly, BARC is one of the largest remaining open spaces in the Anacostia watershed. While most of the watershed has been developed we take any development of land seriously when there appears to be less impactful sites for redevelopment from our perspective. I understand that owning the land and not paying for additional land makes this site more ideal on a balance sheet. I have to use a larger "Balance sheet" to argue for doing more in these times where the government can make better decisions about land use in our watershed. The Federal government owns almost 10% of the land in the Anacostia watershed. Surely there is another federal, state, county or private site that was heavily impacted that needs restoration, that would not dissect contiguous open space, and would help revitalize the River while meeting the operational criteria for selection of this site. A second cash printing site was developed in Fort Worth, TX on municipal land that was donated to attract the development.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	James Foster	Anacostia Watershed Society (AWS)

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81	6	015	The neighboring land use to the west is already industrial and we ask that consideration would be given to purchasing some of that poorly developed and managed industrial area as an option. This would leave land in the BARC for higher and better preservation use and remediate/restore land that has contributed much pollution to the Anacostia River for decades. An example is the impact to wetlands at the proposed site can be mitigated from a “check in the box” perspective but those wetlands are existing: the industrial park destroyed any wetlands there years ago. Locating in that industrial area would improve stormwater management there and utilize existing roads more effectively.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process Water Resources	James Foster Anacostia Watershed Society (AWS)
82	1	025	Thank you for the opportunity to comment on the Bureau of Engraving and Printing’s (BEP) draft environmental impact statement (DEIS) for a new currency production facility at the Henry A. Wallace Beltsville Agricultural Research Center (BARC). Am providing comments covering three areas: Lack of Transparency of Site Selection Discussion The DEIS lacks transparency in how BARC was selected as the preferred alternative. While the DEIS is responsive to EPA scoping comments (see January 2020 BEP Scoping Report) to include a list of sites examined for the facility relocation, there is no explanation as to why 100 acres was the deciding criterion for BARC. Numerous comments cited in BEP’s January 2020 Scoping Report requested information on how BEP concluded that BARC was the best alternative. According to the DEIS, Treasury evaluated 81 potential sites against its minimum criteria for siting such a facility; criteria included parcel size (i.e., 60 acres or more) and location (i.e., within a 30-mile radius of central Washington, DC, and within 10 miles of a major interstate). Treasury eliminated from consideration the 25 privately owned sites and focused on the six federally owned sites. However, there is no explanation in the DEIS or in any analysis linked to the DEIS as to how Treasury changed its parcel size criterion from 60 to 100 acres. Two of the six sites were on parcels of at least 80 acres. In addition, the Biological Resources discussion in the DEIS states that 21.9 acres of the site will not be used in the operational footprint or construction limit of disturbance, further raising a question as to why the additional 20 acres were critical to site selection.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	Kiki Theodoropoulos
83	2	025	Hoping that I would possibly find an explanation relevant to the change in criteria in the September 2015 siting study (GSA, Federal Agency Initial Site Investigation and Screening), which is cited in the 2018 Government Accountability Office (GAO) report (GAO, Bureau of Engraving and Printing: Options for and Costs of a Future Currency Production Facility, GAO-18-338, May 2018) mentioned in the DEIS and in the DEIS itself, I sent an email to BEP to try and acquire the study, because it is not available in the DEIS. Not receiving a reply from BEP, I contacted GAO and was told that BEP had marked the study “Agency Sensitive.” Although the 2015 siting study is cited in the references in BEP’s January 2020 Final Scoping Report, a link to it is not provided, although links to other studies are earlier in the report. Instead, the Project Background moves directly from a discussion of the six federally owned properties, including BARC, identified through the site screening process to a discussion of the 2018 Farm Bill authorizing and directing an interagency land transfer of a portion of BARC from the USDA to the Treasury.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	Kiki Theodoropoulos

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84	3	025	Moreover, no final siting study is mentioned in either the Final Scoping Report or the DEIS that discusses an analysis of alternatives of the six federally owned sites on which Treasury focused. All we are left with is the thin discussion in the DEIS, which appears to reject most of the sites for being on parcels of less than 100 acres. This is hardly an analysis of alternatives that follows best practices (See GAO, DOE AND NNSA Project Management: Analysis of Alternatives Could Be Improved by Incorporating Best Practices, GAO-15-37, Dec. 2014). For example, there is no mention in the DEIS of an entity independent of the analysis of alternatives process reviewing the extent to which all best practices have been followed. Surely if BEP had engaged an independent entity to review its analysis of alternatives, the review would have been cited in the DEIS as the 2018 GAO review (GAO-18-338), which concurred with BEP’s decision that new construction was the best, most cost-effective solution, was cited. The lack of transparency concerning the selection of BARC as the preferred alternative in any of the documents that BEP has made available to the public for comment is concerning and not consistent with the spirit of a public comment process.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	Kiki Theodoropoulos
85	6	026	Lack of Alternatives The DEIS presents only a binary choice -- build on BARC or don’t build at all. This presentation enhances Treasury’s “need” for the facility over the environmental impacts associated with Treasury’s decision to construct and operate the facility on BARC. It puts a thumb on the scale, devaluing the negative impacts that flow from Treasury’s already-determined-decision to build at this particular location rather than any other site. The DEIS attempts to correct for this failure to meet its obligation to present a suite of alternatives by describing a “screening analysis”. But describing a decision that has already been taken does not allow for public input on the decision. Rather than an opportunity for public comment, this kind of back-filling presents an epic agency rationalization. That this is a rationalization, rather than an analysis, is shown by the unexplained changes to the criteria for site selection (for example, initially requiring a 60-acre site, and later requiring a 100-acre site).	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	Clara Kuehn
86	5	028	BARC is part of the last large, relatively undisturbed area of open space and habitat between Baltimore and Washington, D.C. Recognizing its importance, as a green buffer, the Maryland National Capital Parks and Planning Commission has designated BARC in its Green Infrastructure as a “Special Conservation Area.” The Green Infrastructure designation in part is due to the fact that “This complex has vast areas of open space providing ecological hubs and wildlife corridors. The site also contains a wide variety of habitats that provides extensive research opportunities. Its placement in the green infrastructure network’s evaluation area emphasizes that any future land use of the area should be carefully considered.” This designation makes the selection of this unique site for a large industrial facility inconsistent with the values identified by the public and those of the state of Maryland and the region. There is no serious rationale given other than “siting within 30 miles of Washington.” In this age of telecommuting, multiple other industrial areas in the Metro area, decreased levels of important ecosystem services, and declining open space, this is a very weak rationale for destruction of an important natural resource. This “Special Conservation Area” continues to be whittled away, to the detriment of the identified species that are there. To allow another 100 acres to be sacrificed to development would set a precedent for other agencies, who would view the green expanses of BARC as a low-cost site for other federal buildings.	Please refer to Responses to Comments 188, 89, and 90. This Proposed Action would have no effect on the availability of BARC land for use by other non-USDA agencies, as those property transfers would require Congressional approval.	Alternatives Screening Process Land Use Biological Resources	Kurt R. Schwarz MD Ornithological Society

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87	6	028	<p>We submit that BARC is the wrong place for the new printing plant, and the BEP should seek a site that will not be detrimental to Maryland wildlife and vital green space in an otherwise developed area.</p> <p>The MOS is a statewide nonprofit, volunteer organization established in 1945 and devoted to the study and conservation of birds. Currently we have 15 chapters and approximately 1,300 members. Some are scientists and naturalists, but our membership includes people of all ages and all walks of life, from physicists to firefighters, legislators to landscapers. Birding is one of the fastest growing types of outdoor recreation.</p> <p>Thank you for consideration of our views, and please enter them into the permanent record.</p>	Comment noted.	Alternatives Screening Process	Kurt R. Schwarz MD Ornithological Society
88	1	032	<p>Thank you for the opportunity to participate in the NEPA process and comment on your Draft EIS. I hope the US Department of the Treasury (Treasury) will either select the No Action Alternative based on public input, or issue a Supplemental EIS based on public input. The Draft EIS in its current state is an extraordinarily bad example of an adequate NEPA analysis, and is lacking data that would support the conclusions made in the document. I have been a government regulatory wildlife biologist and regulatory specialist most of my career (over 30 years), but I am submitting these comments on my own behalf and the comments do are not reflective of any agency I have worked at. I have prepared over 100 NEPA documents as either the writing team lead, agency rep (for documents prepared by a contractor), or agency senior resource specialist. I have also reviewed and edited 100s of NEPA documents as a regulatory reviewer for agency clearance. I can say based on extensive experience that this document is one of the worst I've ever seen based on the paucity of data used to support its conclusions. The DEIS has substantially inadequate descriptions of affected resources, and analysis of the environmental consequences of the proposed actions on those resources. This inadequacy begins with the site selection criteria and screening process used, which were developed in 2015-16. The screening criteria used are not adequately proven by the DEIS to be "reasonable", or even required to achieve the purpose and need.</p>	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	Jeff Shenot
89	2	032	<p>Starting with criteria #1 (location): "As the seat of the federal government and where Treasury's current and uniquely skilled workforce resides, the NCR is a strategic and necessary location for Treasury's operations. As such, the site must be within an approximately 30-mile radius of central Washington, DC (i.e., measured from the Washington Monument)." As all federal agencies in the NCR learned this year due to Covid, that statement is not supported based on current operating capabilities and standards for the federal government in the NCR. With only a few exceptions, nearly all of the 250,000+ federal workers in the NCR were required to telework due to Covid, and have effectively been doing so for about 8 months now.</p>	Comment noted. Currency production processes (e.g., design, engraving) and research and development cannot be conducted remotely. BEP personnel reported to the DC Facility throughout the pandemic. No change made to the FEIS.	Alternatives Screening Process	Jeff Shenot

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90	3	032	<p>There is no justification provided why Treasury’s new BEP would have to be within a 30-mile radius of the Washington Monument for its workforce to do their “uniquely skilled” work. By requiring a site to be within a 30-mile radius of the Washington Monument, Treasury is effectively ignoring many potential sites that could be not only more strategic but also way more cost effective. Even if Treasury insisted on staying within 30 miles, commercial real estate is at the highest vacancy level now since the 2008 great recession (the most recent data I can find available shows its down 40% from the quarterly average https://wtop.com/business-finance/2020/10/office-leasing-in-d-c-falls-to-lowest-level-since-the-great-recession/). Let’s be real here, Treasury should look at this from a post-Covid, 2021 perspective, not a 2015 one. There have been major changes in the NCR facilities landscape and workforce operations, and this Draft EIS should describe and adequately evaluate this but there is not even a mention of it.</p> <p>Bottom line regarding siting, there are very likely to be numerous affordable and strategic locations in the general DC region that have not been considered adequately, which flaws this NEPA document from the start. I recommend that Treasury should not use this criterion, and should develop new criteria based on current federal agency capabilities and cost-benefit factors. I also recommend the site should be within 10 miles of one of the 3 major international airports in the region (IAD, DCA and BWI).</p>	A site within 30 miles of downtown Washington D.C. is necessary to maintain proximity to the existing BEP workforce and other federal programs. Please also refer to Response to Comment 89.	Alternatives Screening Process	Jeff Shenot
91	13	032	<p>In summary, I urge Treasury to either:</p> <ul style="list-style-type: none"> -Prepare a Supplemental EIS with adequate resource descriptions and impact evaluations as I described, or - Select the No Action alternative and start over the process by developing new site selection criteria, based on existing 2021 federal agency operating standards and protocols as I mentioned in my comments. 	Comment noted.	Alternatives Screening Process	Jeff Shenot
92	2	035	I am appalled the area was even considered. Why does Prince George's County have to bear any more industrialization of its rural areas? We are already fighting location of the MAGLEV project near our home and now this. Certainly the old plant may need modernization but it can be done without destroying one of the few working farms in suburban Prince George's County. Additionally, the agricultural research going on at BARC will be even more important as we face global warming and the destruction of food-producing land and small farms. Please leave the BARC site intact and refurbish the money-making plant where it is or find a site that won't destroy our precious rural lands.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	Lucy Carter
93	3	037	Chapter 1.0 Purpose and Need for the Proposed Action, Section 1.4: One of the reasons given for the selection of the Beltsville Agricultural Research Center site is BEP’s desire to construct the new facility in the National Capital Region because of the skilled workforce. What other locations within the National Capital Region were considered? What would be the impacts to natural resources (i.e., wetlands and waterways) at other possible locations within the National Capital Region?	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	Amanda Sigillito MDE

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94	5	037	<p>Alternatives Analysis</p> <p>Chapter 2.0 Description of Proposed Action and Alternatives, Section 2.3: This Section of the DEIS, mentions that 81 potential sites for the new BEP location were identified. Of these, 31 did not meet the minimum screening criteria, while 25 were privately owned and were dismissed from consideration because it would cost approximately \$30 - \$60 million dollars to repurpose the site. What is this repurposing cost estimate based on? Were impacts to natural resources evaluated on these properties?</p>	<p>These values were estimates based on general property costs throughout the NCR. Treasury deleted these values from the FEIS.</p>	Alternatives Screening Process	Amanda Sigillito MDE
95	3	039	<p>The DEIS fails to advance a reasonable range of alternatives for consideration. The information provided indicates that the DEIS has been completed to rationalize or justify decisions already made, as opposed to serving practically as an important contribution to the decision-making process. Multiple rounds of alternatives were screened out prior to engagement in the NEPA process, leading to the elimination of all alternative sites other than the BARC site. The Purpose and Need statement is too narrowly defined, and the final screening criteria outlined in the DEIS lack clear justification. The City strongly encourages Treasury to revisit the Project's Purpose and Need statement and the final screening criteria to produce a wider range of options based on rational and justifiable criteria. Additionally, to provide a fuller understanding of Treasury's decision-making process to date, Treasury should make available to the public the following documents:</p> <ul style="list-style-type: none"> • Feasibility Study for Renovation and/or Relocation of the Washington, DC Facility (2010) • Facility Strategic Alternatives Study (2013) • Federal Agency Initial Site Investigation and Screening (2015) • Future Workplace Recommendations Report (2017) • Conceptual Site Layouts and Utility Study, Beltsville Agricultural Research Center (2020) <p>To enable a more comprehensive understanding of land use planning at BARC, Treasury and USDA should also make available the 1979 Beltsville Agricultural Research Center Master Plan and all updates, including the 1996 Master Plan Update Master Plan Report.</p>	<p>Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS. Please also refer to Responses to Comments 3 and 5.</p>	Alternatives Screening Process Purpose and Need	Holly Simmons City of Greenbelt
96	6	039	<p>At this time, the City restates its strong opposition to Treasury's Preferred Alternative and support for the No Build Alternative. We urge Treasury to reconsider the Purpose and Need of the Project and the alternatives under consideration. We also request that a more complete investigation of all alternatives be provided with the next iteration of the DEIS. We firmly believe that BARC is an inappropriate location for the CPF, and that the location of a replacement CPF on BARC will harm BARC, our community, and the region.</p>	<p>Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.</p>	Alternatives Screening Process	Holly Simmons City of Greenbelt

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97	7	039	If Treasury does not issue a Supplemental Environmental Impact Statement and provide the required public review and comment, the City asks that the missing information we have requested be provided and an extension of the comment period on the DEIS be granted. The City requests that additional documents and supporting materials be made available to the public, so that the public can understand and meaningfully comment on Treasury's decision-making process to date, and meaningfully inform Treasury's final decision and implementation. An extended comment period would allow time for review of documents and generation of additional comments. Thank you for the opportunity to comment. The City's detailed comments are included as an attachment. The City urges you to review the attachment, so you can fully understand how the DEIS fails to adequately evaluate and mitigate the impacts of this project.	Please refer to Response to Comment 95 and the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS. Treasury does not anticipate extending the public comment period on the DEIS.	Alternatives Screening Process Public Participation	Holly Simmons City of Greenbelt
98	9	039	The Purpose of the proposed Bureau of Engraving and Printing's new Currency Production Facility (CPF) (Project) facility is to "construct and operate a new, up to 1 million square-foot CPF on a minimum 100-acre parcel of federally owned." DEIS, ES-2. The purpose statement includes the stipulation that the site must be a minimum of 100 acres but provides no justification for this minimum acreage. The DEIS indicates that International Security Committee (ISC) security and setback requirements factor into the site area requirements, but it is not clear how this specific setback was established, and no supporting information is provided.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS, and to Responses to Comments 26, 3, and 5.	Alternatives Screening Process	Holly Simmons City of Greenbelt
99	11	039	The assumptions underlying the 100-acre parcel requirement and claim that a renovated CPF cannot support "modern currency production" are faulty, not supported by the information provided in the DEIS, and render the purpose and need fatally flawed. Previous screening criteria specified a site of a minimum 60 acres, and while the DEIS states that "standards and specifications [...] had evolved over this time," DEIS, 2-13, it is unclear what the change is that would increase site area requirements by more than 50%. Further, the Biological Resources portion of the DEIS indicates that 21.9 acres of the site will not be utilized in the operational footprint or construction limit of disturbance (LOD). The Project Purpose and Need must be revised so that it is not premised on false or inaccurate information. A revised Purpose and Need will also require reevaluation of the alternatives developed and the associated screening criteria, as is discussed in more detail in Section III below.	Please refer to Response to Comment 6 and the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process Purpose and Need	Holly Simmons City of Greenbelt
100	13	039	III. Alternatives ConsideredThe Department of Treasury (Treasury) failed to consider all reasonable alternatives in the DEIS, making the alternatives analysis inadequate. The alternatives analysis is the "heart" of an EIS. 40 C.F.R. § 1502.14 (2019). NEPA requires that an agency "[r]igorously explore and objectively evaluate all reasonable alternatives" to the proposed action. 40 C.F.R. § 1502.14(a) (2019) see also 40 C.F.R. § 1502.14(a), (b) (2020). An agency must consider a range of alternatives "sufficient to permit a reasoned choice among the options." Wyoming v. U.S. Dep't of Agric., 661 F.3d 1209, 1243 (10th Cir. 2011) (quoting Ass'n Working for Aurora's Residential Env't v. Colo. Dep't of Transp., 153 F.3d 1122, 1130 (10th Cir. 1998)); see also Sierra Club v. Watkins, 808 F. Supp. 852, 872 (D.D.C. 1991) (agency is required to "consider a range of alternatives that covers the full spectrum of possibilities"). The DEIS, however, fails to consider reasonable alternatives to the Project, examples of which are discussed below, and is therefore inadequate. See Citizens for a Better Henderson v. Hodel, 768 F.2d 1051, 1057 (9th Cir. 1985) ("[T]he existence of a viable but unexamined alternative renders an environmental impact statement inadequate.").	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	Holly Simmons City of Greenbelt

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101	14	039	The DEIS compares the No Action Alternative with one CPF location and design. The screening process outlined in the DEIS and information contained in the Final Scoping Report demonstrate that multiple alternatives were screened out prior to and outside of the NEPA process. This precluded the required evaluation of all reasonable alternatives. The DEIS claims that the proposed action at the U.S. Department of Agriculture’s (USDA) Henry A. Wallace Beltsville Agricultural Research Center (BARC) is the only reasonable alternative that satisfies Treasury’s Propose and Need and selection criteria. The DEIS states that, “31 sites (see Figure 2.3-1) met their minimum criteria, including 25 privately owned sites (on 22 private parcels) and six federally owned sites.” DEIS, 2-13. The DEIS further explains that all but one site, the BARC site, were screened out. All private sites were screened out because they were not on federal land and five of the remaining federal sites were screened out because they did not meet one or more screening criteria. NEPA does not mandate that an EIS consider any specific project alternatives. At the same time, however, it does not allow an agency to eliminate alternatives “merely because they do not offer a complete solution” to the purpose and need of the proposed Project. Nat. Res. Def. Council v. Morton, 458 F.2d 827, 836 (D.C. Cir. 1972).	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	Holly Simmons	City of Greenbelt
102	15	039	Treasury eliminated five of the six remaining federal site alternatives because those alternatives did not meet one or two specific aspects of the Purpose and Need of the Project, even though the agency admitted that those alternatives met other aspects and even though the BARC alternative selected failed to meet all aspects. Additionally, the rationale provided to support dismissal of these five alternatives is insufficient to provide meaningful public review and comment. The explanation of why each of these five federal sites were dismissed is explained in under one page and provides no supporting information. Treasury asks the public to simply take their word for it. The DEIS includes among the listed references a report on the initial site investigation process, Federal Agency Initial Site Investigation and Screening, but has not made this document available to the public, precluding public review and comment in violation of NEPA. GSA (2015). See 40 C.F.R. § 1502.21 (2019) (“No material may be incorporated by reference unless it is reasonably available for inspection by potentially interested persons within the time allowed for comment. Material based on proprietary data which is itself not available for review and comment shall not be incorporated by reference.”); 40 C.F.R. § 1501.12 (2020); see also id. §§ 1500.3(b), 1503.4(a), 1505.2(b) (2020). For these reasons, and those listed below, Treasury improperly eliminated alternatives that could have meet some purposes of the Project.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	Holly Simmons	City of Greenbelt
103	16	039	Screening criteria do not include environmental concerns. The initial and final screening criteria listed in the DEIS does not appear to include any consideration of environmental concerns, despite Treasury’s NEPA Regulation (Treasury Directive 75-02) requiring that “The Department of the Treasury (Treasury) will consider environmental quality as equal with economic, social, and other relevant factors in program development and decision making processes.”	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	Holly Simmons	City of Greenbelt

Bureau of Engraving and Printing (BEP) Environmental Impact Statement (EIS) Public Comments on Draft EIS - Comment Response Matrix							
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104	17	039	Alternative analysis omits other site designs at Treasury’s Alternative site. The DEIS considers only one conceptual site design at one location, and further caveats that this design is subject to change in final engineering and design. The Draft Finding of No Practicable Alternative (FONPA) submitted with the DEIS states that “Three site configurations were evaluated by the design team” at Treasury’s Preferred Alternative site, but it appears these have not been made available to the public, and they are not treated individually in the DEIS. The DEIS lists among the references a layout and utility study report, Conceptual Site Layouts and Utility Study, Beltsville Agricultural Research Center, but this report has not been made available to the public. BEP (2020b). The DEIS also fails to disclose that multiple site configurations are/have been considered by the project team. A review of the conceptual rendering provided in the DEIS reveals opportunities exist to reduce and reconfigure the proposed development to minimize impact to wetlands and waterways, cultural resources, noise levels and lighting, viewshed, etc. For example, alternative site design(s) at Treasury’s Preferred Alternative site could consider structured parking, facility of different size (e.g., meeting Treasury’s maximum versus minimum floor area), variations in facility orientation, variation in loading zone location, etc. During the public scoping period, the U.S. Environmental Protection Agency (EPA) made additional suggestions to incorporate Green Infrastructure/Low Impact Design into the design. These comments do not appear to have been addressed.	Please refer to the Master Responses provided under "Alternatives Screening Process" and "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS, as well as Response to Comment 31.	Alternatives Screening Process Description of the Proposed Action	Holly Simmons	City of Greenbelt
105	18	039	Public input not considered regarding alternatives. Various commenters, including the City of Greenbelt and the EPA, indicated during the public scoping period that additional alternatives should be considered. Because seemingly reasonable alternatives were eliminated prior to the DEIS, the public and decision-makers are unable to understand the relative impacts to the human environment of, for example, retrofitting the existing BEP facility for another fifty years (the anticipated life of the Project) or redeveloping an existing industrial site within the National Capital Region (NCR). At a minimum, the City believes it would be appropriate for Treasury to include analysis of three additional alternatives: the two federal facilities purported to have been dismissed from consideration based on size alone (the Olney Federal Support Center and the Plant Introduction Center), and the Landover Mall, which was specifically referenced in multiple comments during the scoping period. The DEIS could also include different site design proposals for Treasury’s Preferred Alternative site.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS, as well as Response to Comment 4.	Alternatives Screening Process	Holly Simmons	City of Greenbelt
106	8	040	I'm sure others will give you further comments on the environmental impacts. I'll end here by stating that the choice of BARC for any industrial usage is inappropriate. Failure of the Bureau of Engraving and Printing to program the required funding to build on other than "free" Federal land is not the responsibility of the residents of Prince George's County nor is it a reason to plunk the BEP on the BARC. If the situation is as dire as stated in the Draft EIS, Congress or the Department of Treasury has the resources to find a better and more fitting location such as the former commercial site at the intersection of the Beltway and Route 202.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	Melissa Daston	

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107	4	042	I want BARC to stay in Beltsville!!! If sharing some of their land with another Federal agency gives BARC stability I am in favor. If BARC is declared surplus who knows what will happen. To those who are opposed to this proposal I say " Be careful what you wish for...."	Comment noted.	Alternatives Screening Process	Karen Coakley
108	5	044	Alternatives Analysis Several other federal properties were dismissed as they were less than 100 acres. As parcel size was a critical consideration for site selection, we recommend that the need for a minimum of 100-acre site be further discussed and supported.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
109	6	044	The DEIS indicates that Treasury undertook a robust and sequential screening process for suitable sites. Section 2.3 presents a brief overview of that screening process. For transparency, we recommend that additional document(s) outlining the process and the sites considered be referenced or provided.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
110	7	044	Two other potential sites were considered at BARC. The East Airfield was dismissed as "USDA identified that the site was recently proposed for another federal use that would conflict with the Proposed Action". We recommend that this be further explained. It would also be helpful to clarify the plan or strategy used to select potential sites to be excised from BARC.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS. Section 2.3.3.1 was revised to note that the East Airfield became unavailable for the Proposed Action due to BARC's proposal to use it for a solar array.	Alternatives Screening Process	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
111	2	047	It is important to note that during the DEIS public hearing on December 2, 2020, nobody spoke in favor of the preferred alternative while many flaws in this DEIS were commented on. Since that meeting the City of Greenbelt has issued detailed comments on the DEIS, which also support the no action alternative. The DEIS did not address the comments I submitted during the scoping public comment period. In those comments I stated my concern that the NEPA process is being drawn too narrowly for this project. Although we were told at the December 3, 2019, scoping meeting that over 100 sites have been examined, the DEIS only considered the BARC site and a no-action alternative. The DEIS does not provide information on the full set of over 100 sites examined. It is very unusual for an EIS to only consider one build alternative, as this EIS is doing. Additional alternative building sites should have been fully analyzed and evaluated in the DEIS. One alternative building site that should have been included is the location of the former Landover Mall, which is the right size for the BEP needs and is located adjacent to major highways.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	Benjamin Fischler

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112	7	048	<p>Alternatives to the Beltsville Agricultural Research Center (BARC) property. As noted above, the Scoping Report claims to have conducted a vigorous analysis of multiple sites with the December 3, 2019 presentation stating that “nearly 100 sites and multiple funding options explored.” The Executive Summary states that, based on the purpose and need, only the 104-acre parcel at BARC met the need of the BEP. The alternatives screening process notes that of the 81 sites identified all but six were discounted almost immediately due to the new criteria of the location must be on available Federal property (the rationale given was no money has been programmed to procure property). The decision not to seek funding is not a sufficient reason to select the BARC location. The new facility will allow the closing of the Landover warehouse and the funds saved could be applied to a commercial site.</p>	<p>Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.</p>	<p>Alternatives Screening Process</p>	<p>Thomas E. Dernoga c/o Michelle Garcia Prince George's County Council</p>
113	2	050	<p>The Draft EIS failed to identify all potential federal sites that meet the proposed projects criteria. One such site that was egregiously omitted, for example, is the GSA's 229-acre parcel at 11600 Springfield Rd. in Beltsville, where the Dept of State and the Central Intelligence Agency Special Collections Service have facilities. The Dept of Defense (DOD) has numerous tracts of land in the DC metro region, some of which are over 1,000 acres. Fort Meade currently houses multiple agencies and has several large open areas on its northeast side that meet the size requirements of the proposed action. Perhaps these were dismissed early on, but the EIS must state why these sites were rejected, as they are within the study area.</p> <p>The Draft EIS has no alternatives analysis and fails to meet the spirit of the requirements of EPA's NEPA regulations at 40 CFR 1508. While no explicit requirement for the number of alternatives is specified in the regulations, it is generally accepted that at least two action alternatives should be proposed. To be considered robust, an EIS should present more than one alternative besides the no-action alternative to demonstrate that adequate options were evaluated. The draft EIS provides a false binary choice in this regard. As mentioned earlier, the EIS failed to consider other federal properties in the study area. Other options besides federal land transfer could also have been evaluated, such as leasing of federal lands, or dividing up the CPF operations to multiple smaller facilities (new or existing) in the region. Another alternative that is not even mentioned would have been to retain some aspect(s) of the current facility while moving other operations to a smaller, new facility. No mention or consideration of such reasonable, practicable alternatives, and the lack of rationale provided as to why such alternatives would not meet the project need, demonstrates that the alternatives analysis is severely lacking and therefore should be reworked and republished for public comment.</p>	<p>Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS. Additionally, Section 2.3 of the FEIS was revised to note that Treasury consulted the DoD regarding potential properties it could consider for the Proposed Action, but the DoD was unwilling to make any sites available to Treasury.</p>	<p>Alternatives Screening Process</p>	<p>Ross Geredien</p>

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114	2	052	Section 1.4 of the EIS states that the new construction of a one million square foot with a height of 40 to 50 feet would support the Treasury’s long-term plan for efficient, streamlined currency production, however, the BEP has not provided an analysis of why the given space requirements were selected. Considering the Fort Worth plant (WCF) already accounts for more than 60 percent of the printing of U.S. notes, an analysis of space requirements for this facility should be conducted. This analysis should include the inventory of current plant space, the Main Building, the Annex, and the warehouse in Landover, and show how that can be accommodated in the new plant along with the space required for future needs. An analysis is important because underestimating or overestimating the plant size is an expensive error. In addition, overestimating the plant size will unnecessarily increase the environmental impact of construction and operations.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS, as well as Response to Comment 25.	Alternatives Screening Process	Kobe Ramirez c/o Julian Grauer	Environmental Review, Inc.
PM-5	4	032	And I think, by and large, there's a lot of information available to you that I'm quite baffled as to why it wasn't provided in this document. So I'll provide some more information to you in written comments. I also was concerned about the site you've chosen, and there's no justification as to why that's the only site.	Please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Alternatives Screening Process	Jeff Shenot	
Section 2.4.1 - No Action Alternative							
115	40	016	(Line 989) No mention is made of the status of BARC’s Wildlife Office and two poultry buildings under the No Action Alternative. Would the US Department of Agriculture (USDA) continue to operate these buildings? What would happen to the unused 200 Area buildings under the No Action Alternative? For completeness, the future of the 200 Area buildings under No Action Alternative should be addressed.	Section 2.4.1 of the FEIS was revised to note that under the No Action Alternative, the USDA would be responsible for managing all extant buildings. This section also references Section 2.3.3.3 of the FEIS, which was revised to note that the USDA would relocate the existing BARC operations from the Project Site independent of Treasury's Proposed Action.	No Action Alternative	Debbie McKinley	
116	41	016	(Lines 992-994) Unlike the description of the Preferred Alternative, the description of the No Action Alternative is presented in a biased manner by using descriptors such as “deficient”, “inefficient”, “less secure”, and “higher risk”. The No Action Alternative should be described in an objective manner as is done for the Preferred Alternative. The word “deficient” as well as the last sentence should be deleted.	Comment noted. The language used in Section 2.4.1 of the FEIS is consistent with description of the Purpose and Need in Section 1.4 of the FEIS. No change made to the FEIS.	No Action Alternative	Debbie McKinley	

**Bureau of Engraving and Printing (BEP) Environmental Impact Statement (EIS)
Public Comments on Draft EIS - Comment Response Matrix**

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Section 2.4.2 - Preferred Alternative							
117	1	012	<p>On behalf of the State of Maryland, I write to you today in strong support of the proposed relocation of the Bureau of Engraving and Printing's replacement currency production facility to the USDA Beltsville Agricultural Research Center (BARC) located in Prince George's County, Maryland, which would move 1,600 highly skilled employees to our great state.</p> <p>The additional infusion of workforce would have a significant impact on our economy, spurring additional investment in the area while supporting the County's goal of regional redevelopment. Maryland has a long history of manufacturing and is working hard to maintain and grow this industry sector. Additionally, taxpayers will benefit from the construction of a new technologically advanced facility, thereby reducing the cost of rehabilitation of the aged production facilities.</p> <p>Locating the new facility on the 6,500-acre BARC campus addresses several key needs of the Bureau, including transportation and workforce. With its central location adjacent to major roads and highways as well as airports, the BARC campus offers ease of transportation of raw materials as well as finished products. In addition, this location will help retain the Bureau's highly skilled workforce and attract new workers, as 65 percent of the current workforce resides in Maryland with 43 percent living locally in Prince George's County.</p> <p>We recognize the impact the federal sector has on Maryland's economy and are committed to maintaining a strong federal-state partnership. As consideration for relocation continues to move forward, Maryland's state agencies stand ready to collaborate with project stakeholders to assist in the development of a facility that provides for the needs of the Bureau of Engraving and Printing and promotes economic development in the surrounding region, while mitigating any potential adverse impacts from the project.</p> <p>Thank you for considering Maryland for the new Bureau of Engraving and Printing location. We are happy to provide support to the U.S. Army Corps of Engineers, Baltimore District throughout the development process.</p>	Comment noted.	Preferred Alternative	Larry Hogan (c/o Helga Weschke)	State of Maryland, Office of the Governor
118	42	016	(Line 1002) The statement that the parcel is unused appears inconsistent with the previous statement that three buildings are still in use within the parcel: BARC's Wildlife Office and two poultry buildings. These two statements should be reconciled.	This word in Section 2.4.2 of the FEIS was revised to "available." Please also refer to Response to Comment 115.	Preferred Alternative	Debbie McKinley	
119	1	017	As a local small business located in Old Greenbelt, within Roosevelt Center, I am excited to see new business being brought into the area especially the Bureau of Engraving. My father, Randall Schoch, was an engraver with the Bureau, he has since retired. But memories of touring the facilities as a child hold a special place for me. I look forward to welcoming your staff into our wonderful community of Greenbelt.	Comment noted.	Preferred Alternative	Gretchen Schock	Bee Yoga Fusion

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120	1	029	I am writing to express my opposition to the proposed Bureau of Engraving and Printing (BEP) plan to move its industrial and production operations from D.C. to the Beltsville Agricultural Research Center which borders the town of Greenbelt, MD. The industrial money-making factory will have many detrimental effects on our community and environment. The environmental impact statement done by the U.S. Army Corps of Engineers states very clearly that there is the potential for "significant adverse effects" particularly in terms of our water resources, traffic, noise and light pollution. Please reconsider these plans as it will at best diminish the quality of life here and at worst result in serious environmental degradation as well as potential health risks for both people and wildlife from polluted waste water and other toxic substances.	Comment noted.	Preferred Alternative	Sara Alpay
121	13	030	Because of its natural beauty, and its environmental and historical significance, this site is very important to us. Butch and Beth Norden live within walking distance of the land and have been hiking it and driving through it for decades with their children and, now that the children are grown, by themselves. They are helping to raise a grandchild who lives near them in Greenbelt and hope to take him to see its bald eagles and many other natural beauties. Together with Vickie Fang, who lives nearby in Prince George’s County, they take a keen interest in any development on this land.	Comment noted.	Preferred Alternative	Vickie Fang, Butch Norden, Beth Norden
122	19	039	IV. Project Site BoundaryThe DEIS and supporting materials provide conflicting information on the Project Site boundary. For example, the Bat Survey and the Cultural Resources Technical Memorandum Appendices show a larger project site than the figures provided in the body of the DEIS. The project site appears to have been reconfigured. If a reconfiguration has occurred during the preparation of the DEIS and background materials, this information should be clearly disclosed in the DEIS. Any impacts on analyses and findings should be identified and addressed, along with any implications for implementation of regulations, such as the Maryland Forest Conservation Law. A copy of the legal description and map of the parcel of real property to be transferred from USDA to Treasury per Section 7602(b) of the 2018 Farm Bill, including metes and bounds, should be provided with the DEIS.	The commenter is correct. The initial studies conducted by Treasury encompassed a larger area, as the more precise boundaries of the Project Site were not yet determined through discussions between the USDA and Treasury. Treasury conducted these studies early in the planning process. As the planning process evolved and the Project Site became more well-defined, analyses focused on that better-defined parcel. The boundaries of Treasury's proposed parcel did not change between the scoping period and DEIS publication. However, Treasury did add the portion of the Project Site associated with the proposed entrance road and Powder Mill Road improvements to ensure its analysis included these connected actions. Treasury updated its WOUS, MFCA, and HTMW fieldwork/reconnaissance to ensure the data presented in the DEIS encompassed the entire Project Site. Treasury has uploaded these updated data to the project website to accompany the Wetland Delineation Report, FSD, and ECOP/Phase II Environmental Site Assessment published previously. No change made to the FEIS.	Preferred Alternative	Holly Simmons City of Greenbelt
123	1	041	Related to my comments below, I want to go on record and state my strong opposition to Treasury’s Preferred alternative, and state strong support for the No Action alternative. I also have included these comments as an attachment to this message.	Comment noted.	Preferred Alternative	Tom Taylor Member of Beaverdam Creek Watershed Watch Group

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124	1	042	I have lived 3 blocks from BARC my entire life... 63 years. Having BARC as a neighbor was a wonderful experience growing up as a child. There were numerous outings learning about plants, nutrition, livestock seeing the inside of a cow, the Beltsville turkey. Too many firsts to list. BARC's Success and BARC's 1st were Beltsville's Success. My childhood friends parents were the scientists researching the impact of droughts, or shorter growing seasons, how to grow plants and livestock in adverse conditions. Learning to appreciate the benefit of such vast open space in an increasing urban area.	Comment noted.	Preferred Alternative	Karen Coakley	
125	3	042	I support BARC wanting to partner with the Bureau of Engraving and Printing. If the land continues to sit vacant it leaves all of BARC at risk. There have been comments about traffic....funny thing is those raising traffic as a concern are the same people who have fought Maryland 201 extended from Greenbelt to Laurel for years. The result is rush hour is now 3 hours in the morning and 3 hours in the evening with cars sit idling at the various traffic lights along Edmonston / Maryland 201. Construction Technology has also changed which will help with the emission concerns from the new facility.	Comment noted.	Preferred Alternative	Karen Coakley	
126	6	045	The proposed Bureau of Engraving & Printing (BEP) Replacement Currency Production Facility (CPF) at the Beltsville Agricultural Research Center (BARC) in Prince George's County is an exciting opportunity for both the County and the Federal government. However, the proposed CPF must address its significant impact of the surrounding communities, as well as the environmental, economic and transportation issues, that such a project would create at the preferred location. Given the extensive public and governmental input and the extended timeline line for the planning, approval and construction, I am hopeful that all issues can be addressed appropriately going forward.	Comment noted.	Preferred Alternative	Todd M. Turner	County Council Member, 4th District Prince George's County Council
127	1	050	I am writing in regards to the draft Environmental Impact Statement (EIS) for the Dept. of the Treasury, Bureau of Engraving and Printing (BEP) Replacement Currency Production Facility Project at the Beltsville Agricultural Research Center (BARC). I am a resident of <redacted> and a member and volunteer for the Maryland Ornithological Society. I regularly perform volunteer bird surveys on the BARC property and have become familiar with its natural resources over the past several years. It is truly a unique tract of land in the DC-Baltimore metropolitan region and even within the Northeast Corridor. The proposed action would be an inappropriate use for the site, and the draft EIS is severely deficient in many aspects so as to justify a rating of EO-3 at best. The BARC is an under appreciated institution. It is the U.S. Dept of Agriculture's (USDA's) largest research facility and has great potential for the future as a center for globally significant research in sustainable agriculture and climate adaptation research. USDA's willingness to transfer land to the Dept of Treasury is a symptom of the lack of maintenance and investment in such research. But building a massive industrial facility creates a perverse incentive for the BARC and is contrary to the Center's mission of providing the American public "...with an exceptionally talented, highly interdisciplinary scientific community....and leverage these resources to envision, create, and improve knowledge and technologies that enhance the capacity of the nation - and the world - to provide its people with the health crops and animals; clean and renewable natural resources; sustainable agricultural systems; and agricultural commodities and products that are abundant, high-quality, and safe."	Comment noted.	Preferred Alternative	Ross Geredien	

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128	1	053	No facilities should be built on BARC land. It's primarily a nature preserve and that should not be altered. It's more important for that land to be preserved for nature and to maintain Maryland's environment and ecological diversity. There are so many other places to put this building, so put it somewhere else where there is already infrastructure for a building, parking, cars driving to and from work, and hundreds of workers.	Comment noted.	Preferred Alternative	Shelby
129	1	055	This is unacceptable and so unfair. I just bought my house a little over 2 years ago and I certainly didn't buy it for it to be across the street from traffic, noise, environmental pollutants, and other unforeseen issues. This is a beautiful quiet residential neighborhood not a business district. Please do not allow this to happen. Many thanks for your serious consideration.	Comment noted.	Preferred Alternative	Mary Roary
130	1	056	Thank you for the opportunity to respond to concerns involving the move of the Bureau of Engraving from downtown DC to the Beltsville Agricultural Center. I would like to make several comments: 1. This seems generally like a logical and sensible move and I hope you continue to follow all state, local, and federal guidelines and communicate with your neighbors.	Comment noted.	Preferred Alternative	Jeanette Helfrich and John Rayner
131	1	057	I am writing to express my opposition to the proposed Bureau of Engraving and Printing (BEP) plan to move its industrial and production operations from D.C. to the Beltsville Agricultural Research Center which borders the town of Greenbelt, MD. The industrial money-making factory will have many detrimental effects on our community and environment. The environmental impact statement done by The Army Corps of Engineers states very clearly that there is the potential for "significant adverse effects" particularly in terms of our water resources, traffic, noise and light pollution.	Comment noted.	Preferred Alternative	Magdalena Scarato
132	2	057	Please reconsider these plans as it will at best diminish the quality of life here and at worst result in serious environmental degradation as well potential health risks for both people and wildlife from polluted wastewater and other toxic substances.	Comment noted.	Preferred Alternative	Magdalena Scarato
PM-13	1	009	I acknowledge the comments of the previous commenters. I also want to buttress the comments of the EPA on the EIS. I think the project is inappropriate for the site.	Comment noted.	Preferred Alternative	Linda Saffell
PM-22	2	110	There would be lots of reasons to oppose this, citing the Bureau of Engraving and Printing, and I endorse all those reasons. But there's one I think maybe has not been considered, and that is, for years -- for many years -- there have been interests, some sitting in Congress, who have wanted to bust up BARC, who wanted to relocate not just economic research service and many other elements that are situated at the Beltsville farms elsewhere. And I see this, frankly, as a proposal emanating from that history to use it as a federal campus for all manner of this and that, and it should be opposed for that reason.	Comment noted.	Preferred Alternative	Bill Orleans

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Section 3.0 - Impact Analysis - General						
133	4	010	Even given its limited and flawed scope, this EIS concludes that this project will result in significant adverse impacts to: Visual Resources, Cultural Resources, Transportation and transit, Socioeconomics and environmental justice. However, several impact topics are not addressed in the EIS (including land use as noted above) and it does not appear to adequately address the real impact of several areas it does consider.	Land use is analyzed in Section 3.2 of the EIS. No change made to the FEIS.	Impact Analysis	Carolyn Mitchell
134	7	015	In conclusion, the Anacostia Watershed Society appreciates the opportunity to provide comments on the proposed BEP move to BARC. We hope that this proposed development provides co benefits to the communities and people, natural environment, and the overall watershed in the form of sustainable practices, resiliency, protection of human health and the environment, economic development, and top-level security for the site and the operations that outweigh the impacts.	Comment noted.	Impact Analysis	James Foster Anacostia Watershed Society (AWS)
135	1	016	In many instances, no reasoned basis is provided for conclusions reached in either the Draft Environmental Impact Statement (DEIS) or the supporting technical memoranda. The lack of these reasoned bases is a deficiency in the DEIS and should be corrected in the Final EIS.	Comment noted. The analysis in the FEIS was reviewed for accuracy.	Impact Analysis	Debbie McKinley
136	2	016	In many instances, no reasoned basis is provided for the determination of the regions of influence (ROIs) utilized in the various analyses. The lack of these reasoned bases is a deficiency in the DEIS and should be corrected in the Final EIS. Merely stating what ROI was used is insufficient.	Comment noted. The ROI for each resource area was reviewed for appropriateness and justification by a subject matter expert qualified to analyze potential effects within this region, including qualification to determine the reasonable context and intensity of potential Proposed Action effects.	Impact Analysis	Debbie McKinley
137	3	016	In some instances, information supportive of conclusions reached is not contained in either the DEIS, supporting technical memoranda, or other supporting documents. For example, neither the Final Phase II Investigation Report, 104-Acre Parcel of Land Surrounding Poultry Road (SIA-TPMC, LLC, 2020a) nor Final Environmental Condition of Property Report 104-Acre Parcel of Land Surrounding Poultry Road (SIA-TPMC, LLC, 2020b) as accessed through the Bureau of Engraving and Printing (BEP) Replacement Project website (https://www.nab.usace.army.mil/Home/BEP-Replacement-Project/) contain any appendices and, thus, no geological profiles or soil or well boring logs. No field data sheets or analytical laboratory reports were provided in the two reports. Neither the DEIS nor supporting technical memoranda contained any soil boring or well logs and no geologic profiles were presented. The lack of necessary supporting information is a deficiency that should be corrected in the Final EIS.	Comment noted. Relevant findings from background and supporting studies are cited in the FEIS. Treasury made the background studies, or portions thereof, publicly available to provide supplemental context for the EIS. Treasury has the complete appendices for all supporting documents, which can be made publicly available on a case-by-case basis upon request. No change made to the FEIS.	Impact Analysis	Debbie McKinley
138	6	027	In general, more information is needed on the overall environmental impact of the 24-hour operation of the proposed facility, especially regarding lighting and heavy truck requirements. A minimum of LEED Silver certification of the facility is imperative.	Treasury has committed to a LEED Silver certification. Please refer to Sections 3.3 and 3.5 of the FEIS for revisions regarding lighting and noise, respectively, associated with proposed 24-hour operation.	Impact Analysis	Philip S. Aronson

Bureau of Engraving and Printing (BEP) Environmental Impact Statement (EIS) Public Comments on Draft EIS - Comment Response Matrix						
Comment #	Comment # by Reviewer	Commenter ID#	Comment	Response to Comment Blue Shading: Change made to the FEIS. Green Shading: No change made to the FEIS.	Topic(s)	Name Organization (if applicable)
139	5	030	We are very concerned about the the November 2020 Draft Environmental Impact Statement for two reasons. The first is that the important topics of wildlife protection, stormwater runoff, and wetland replacement are addressed through the use of conclusory statements without transparency as to how those conclusions were reached. Our second concern is that at least three important issues were not addressed at all: 1) whether mounds of dirt at the staging areas will be kept adequately covered in case there is a major storm; 2) whether there will be a paleontologist on site to review the dinosaur bones that will almost certain be uncovered, and 3) whether there will be any sort of review of and protection for the anadromous stream that runs through the site.	Comment noted. Soil stockpiles would be managed in accordance with the regulatory-required, project-specific ESCP (see Table 2.2-1 of the FEIS). Regarding paleontology, please refer to Response to Comment 380. On-site water resources would be managed in accordance with the CWA and associated permitting (see Table 2.2-1). No change made to the FEIS.	Impact Analysis	Vickie Fang, Butch Norden, Beth Norden
140	1	031	The proposed site for the BEP Facility in Beltsville, MD may be an underutilized federal site, it is however a site that needs careful consideration. These considerations include, traffic, fish and wildlife, water and human impacts. If building this facility is to occur, then standards should be higher than enforced by law or regulation to ensure impacts are reduced to practically null. I am sure many others including the City of Greenbelt will be sharing with you the negative impacts of the proposed build. There are benefits to building it at the proposed site, but the designers and builders of this facility should ensure the benefits outweigh the negative impacts. To calculate the cost of building it and maintaining the site, ecosystem costs need to be included in the costs and the current report updated to reflect the newer accurate costs and shared with the public.	Comment noted. The FEIS provides a thorough environmental impact analysis for the Proposed Action. No change made to the FEIS.	Impact Analysis	Suzette Agans
141	1	039	The City of Greenbelt has completed its review of the Draft Environmental Impact Statement (DEIS) for the Construction and Operation of a Currency Production Facility (CPF) at the Beltsville Agricultural Research Center (BARC) (Project). The City continues to believe that the proposed relocation of the Currency Production Facility to the Beltsville Agricultural Research Center will have significant impacts on BARC, the human and natural environment, transportation, and the surrounding community. The Project DEIS does not comply with the National Environmental Policy Act (NEPA) and fails to provide the public completed and sufficient analyses. The City supports the No Action Alternative and is strongly opposed to the U.S. Department of the Treasury's (Treasury's) Preferred Alternative. As summarized below and explained throughout our comments, the Treasury must fix the faulty DEIS, provide the public with the information we have requested, and issue a Supplemental DEIS and provide the requisite additional time for public review and comment.	Comment noted. The FEIS complies with NEPA and CEQ implementing regulations, and discloses potential significant environmental effects associated with the Proposed Action. Measures are identified within the FEIS to mitigate potential environmental effects, including EPMs, RCMs, BMPs, and project-specific mitigation measures (see Sections 2.2.4 and 5.5 of the FEIS). Treasury has completed public outreach and engagement, beginning prior to the NOI in 2017, associated with this Proposed Action in accordance with all applicable requirements (see Section 1.10 of the FEIS).	Alternatives Screening Process Impact Analysis	Holly Simmons City of Greenbelt
142	4	039	Furthermore, while the City maintains that additional alternatives should be considered in the DEIS, the analysis and findings related to the two alternatives put forth (Treasury's Preferred Alternative and the No Action Alternative) are deficient in many aspects and raise concerns and questions about the Project. A number of these concerns and questions are related specifically to resources, including land use; historic buildings and structures; visual resources; Beaver Dam Creek and surface waters; stormwater; wetlands; forest retention; lighting; wildlife; traffic and transportation; and environmental justice. More generally, the City is concerned that the methodology employed in determining "regions of influence" and significance thresholds for many of the resources leads to incomplete assessments of effects and their significance. The limits of disturbance and the site boundary both have inconsistencies, and there is a need for additional field investigation of wetlands, forests, and wildlife. Additional information should be provided regarding facility security requirements and their effects, along with accounts of past BEP environmental violations and enforcement issues at the Washington, D.C., facility.	Please refer to Responses to Comments 136, 122, 25, and 463. Also, please refer to the Master Response provided under "Alternatives Screening Process" in Section 9.0 of the FEIS.	Impact Analysis	Holly Simmons City of Greenbelt

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Comment #	Comment # by Reviewer	Commenter ID#	Comment	Response to Comment Blue Shading: Change made to the FEIS. Green Shading: No change made to the FEIS.	Topic(s)	Name	Organization (if applicable)
143	20	039	V. Region of Influence Designations In many instances, the rationale for an identified Region of Influence (ROI) is unclear. The DEIS should provide a brief justification or re-evaluation of the ROIs identified. This is particularly true when the ROI is a simple Euclidean buffer on the project site. Examples include:	Please refer to Response to Comment 136.	Impact Analysis	Holly Simmons	City of Greenbelt
144	24	039	VI. Environmental Consequences and Significance 40 C.F.R. § 1502.16(a) and (b) (2019) requires that the Environmental Consequences portion of the EIS must include a discussion of both direct and indirect effects and their significance. See also 40 C.F.R. § 1508.1(g) (2020). Per 40 C.F.R. § 1508.27 (2019), “Significantly’ as used in NEPA requires consideration of both context and intensity”. It also states, “Both short and long-term effects are relevant” in determining significance. In many instances, it appears that significance thresholds have been defined too narrowly to allow for recognition of all significant adverse impacts, or they fail to consider component parts of the definition of “significantly” per 40 C.F.R. § 1508.27 (2019) or “effects” per 40 C.F.R. § 1502.16 (2019). For example:	Comment noted. Treasury considered direct, indirect, short-term, and long-term impacts, and considered both context and intensity when determining significance. Significance criteria are specifically stated within the Technical Memorandum for each technical resource area section to clearly set forth the threshold at which an effect would be considered significant to that resource area. No change made to the FEIS.	Impact Analysis	Holly Simmons	City of Greenbelt
145	25	039	Significance thresholds are defined too narrowly. This can cause adverse impacts to be overlooked. One example of this is provided in the Wildlife section of this memo (item #1); however, this issue was identified throughout the DEIS.	Please refer to Response to Comment 144.	Impact Analysis	Holly Simmons	City of Greenbelt
146	26	039	Short-term effects are discounted. Per 40 C.F.R. § 1508.27 (2019), “Both short and long-term effects are relevant” in determining significance; however, bike and pedestrian impacts are only identified as “significant” if they “Result in long-term closure or loss of sidewalks, trails, lanes, or other facilities used by pedestrians or cyclists to access frequently visited locations [emphasis added]”. The DEIS states that there would be temporary closures to the bicycle shoulder on Powder Mill Road during construction which would be restored once Powder Mill Road modifications were completed. The DEIS considers these impacts less-than-significant. The City believes that a more accurate assessment would identify these impacts as “short-term adverse effects”, but the significance threshold the DEIS established for pedestrian and bike facilities only recognizes the significance of long-term closures. The idea that short-term impacts are less significant appears throughout the DEIS.	Comment noted. Treasury considered short-term effects in the FEIS. Short-term adverse impacts are often less likely to be significant due to their temporary nature. No change made to the FEIS.	Impact Analysis	Holly Simmons	City of Greenbelt

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147	27	039	<p>Additionally, the DEIS does not consistently categorize the anticipated type (“direct” and “indirect”), and duration (“short-term” and “long-term”), but rather opts to separate environmental consequences by those incurred during “Construction” and “Operation”. This formula can inadvertently obscure impacts. For example, the DEIS recognizes that the proposed diversion and/or filling of 226 linear feet of streams will have a potentially significant adverse impact. The DEIS lists this under Construction impacts but does not explicitly state whether this impact is considered to be short- or long-term, direct or indirect; thus, it is later possible for the DEIS to claim, under the Operation impacts, that “in the long term, the Proposed Action would have no impacts to on-site surface water.” In this example, no consideration of possible direct, long-term adverse effects due to impacts to on-site streams is given.</p> <p>The methodology for each technical resource area must be thoroughly examined to ensure the requirements of 40 C.F.R. §§ 1502.16 and 1508.27 (2019) are being met. Broader significance thresholds and identification of the category, duration, and intensity of impacts, similar to the methodology used in the Traffic Impact Study (TIS) submitted with the DEIS, could be used to address issues identified above. It is anticipated that this would also necessitate revisions in analyses and findings.</p>	<p>Comment noted. Although not individually labeled, Treasury has considered direct, indirect, short-term, and long-term impacts from the Proposed Action. The FEIS complies with NEPA and CEQ implementing regulations. No change made to the FEIS.</p>	Impact Analysis	Holly Simmons City of Greenbelt
148	105	039	<p>XVIII. Need for Additional Field Investigations The DEIS does not provide enough information to form a comprehensive understanding of the Proposed Action’s impacts. The project site, which is to be transferred from the USDA to Treasury, is identified as a 104.2-acre parcel (as described above). Under the Proposed Action, an additional 18 acres adjacent to the project site would be directly impacted by development activities associated with road improvements and modifications. Many of the analyses included in the DEIS examine impacts associated with all of the above areas; however, in some instances, supporting investigations for the 18-acre area have not been made available. For example, neither the Forest Stand Delineation (FSD) nor the Wetland Delineation include these 18 acres adjacent to the project site. Background investigations for this portion of the site must be provided with the DEIS.</p>	<p>Comment noted. Treasury conducted, and incorporated into the DEIS, supplemental scientific data collection for the additional 18-acre area. See also Response to Comment 122. No change made to the FEIS.</p>	Impact Analysis	Holly Simmons City of Greenbelt
149	110	039	<p>To ensure a comprehensive understanding of the Proposed Action’s impacts, impact analyses, supporting investigations, and cost estimates should consider and treat the project site, the 18 acres on which the new entry road and associated modifications to Powder Mill Road are proposed, all areas subject to proposed traffic mitigation measures, and existing BEP facilities, at a minimum.</p>	<p>Comment noted. Please refer to Response to Comment 148 and the Master Response provided under "Perceived "Connected" Actions" in Section 9.0 of the FEIS.</p>	Impact Analysis	Holly Simmons City of Greenbelt
150	113	039	<p>XXI. Limits of Disturbance (LOD) The limits of disturbance appear inaccurate and insufficient. The following issues must be addressed: The LOD associated with work at the project site is shown inconsistently throughout the DEIS (e.g., Figures 3.6-1 and 3.7-3).</p>	<p>Comment noted. Treasury identified a reasonable approximate LOD to support spatial (impact) analyses in the FEIS. The LOD layer is consistent throughout the FEIS, although the symbology used to depict the LOD on figures varies. No change made to the FEIS.</p>	Impact Analysis	Holly Simmons City of Greenbelt

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Comment #	Comment # by Reviewer	Commenter ID#	Comment	Response to Comment Blue Shading: Change made to the FEIS. Green Shading: No change made to the FEIS.	Topic(s)	Name Organization (if applicable)
151	2	040	Impacts. There are significant differences between the Scoping Report and the Draft EIS on negative impacts to the community. These inconsistencies are not noted or highlighted as changes.	Comment noted. The Scoping Report and DEIS are separate documents. The Scoping Report summarizes comments provided by the public, including regulatory agencies, on the Proposed Action and its potential effects early on in the analytical process, immediately following the publication of the NOI to prepare an EIS, and prior to preparation of the EIS itself. The DEIS is Treasury's first draft of its environmental impact analysis. Comments received from the public during scoping, and included in the Scoping Report, are considered in the DEIS and used to shape (or focus) its analysis. Changes made to the FEIS based on the public comments received on the DEIS are discussed in Section 9.0 of the FEIS, including this Comment Response Matrix. No change made to the FEIS regarding the Scoping Report.	Impact Analysis	Melissa Daston
152	7	040	Environmental Impacts. Building a industrial plant that includes toxic material storage and effluent in a pristine agricultural area boggles the mind. The Draft EIS consistently under estimated the number of bird species that have been documented, noted that 120,000 gallons of waste water dumped into pristine creeks and ground water will not create a future Superfund cleanup or further flooding which plagues the area. Nor was there any mention on impacts to existing well water that services this minority population. Another example of discriminatory treatment and negative social justice.	Please refer to the Master Responses provided under "Potential Impacts to Migratory Birds," "Wastewater Treatment - On-site Treatment," and "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS. Potential impacts to groundwater are discussed in Section 3.7.2.2 of the FEIS.	Impact Analysis	Melissa Daston
153	1	044	In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act, and the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS or Study) prepared for the U.S. Department of Treasury (Treasury) for the construction and operation of a new Currency Production Facility (CPF) at the Henry A. Wallace Beltsville Agricultural Research Center (BARC) in Prince George's County, Maryland. The facility would replace Bureau of Engraving and Printing's (BEP's) current manufacturing operations in Washington, D.C. The Proposed Action would relocate the new currency project facility to the Central Farm area of BARC. Thank you for providing the Study for our review. EPA also appreciates the consideration given to our December 13, 2019 scoping comments.	Comment noted.	Impact Analysis	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
154	1	045	Please consider these comments on the Draft Environmental Impact Statement (DEIS) for the Proposed Bureau of Engraving & Printing (BEP) Replacement Currency Production Facility (CPF) at the Beltsville Agricultural Research Center (BARC) in Prince George's County, Maryland. I am the elected member of the Prince George's County Council, 4th Council District and represent the area to the south of the proposed site, including the City of Greenbelt, the Washington Metropolitan Area Transit Authority (WMATA) Greenbelt Metrorail Station and several of the intersections impacted by the preferred alternative.	Comment noted.	Impact Analysis	Todd M. Turner County Council Member, 4th District Prince George's County Council

Bureau of Engraving and Printing (BEP) Environmental Impact Statement (EIS) Public Comments on Draft EIS - Comment Response Matrix						
Comment #	Comment # by Reviewer	Commenter ID#	Comment	Response to Comment Blue Shading: Change made to the FEIS. Green Shading: No change made to the FEIS.	Topic(s)	Name Organization (if applicable)
155	1	048	Thank you for the opportunity to provide comments regarding the Draft Environmental Impact Statement (EIS) for Bureau of Engraving and Printing (BEP) Replacement Project. My comments reflect the presentation, comments from my constituents at community meetings, the presentation and materials provided at the December 2, 2020 Webex Public Meeting and on the project web site.	Comment noted.	Impact Analysis	Thomas E. Dernoga c/o Michelle Garcia Prince George's County Council
156	2	048	Accuracy and Consistency of the Draft EIS. The Draft EIS and its supporting documents and presentation had multiple inconsistencies. For example, the Scoping Phase Report stated that “nearly 100 sites and multiple funding options explored.”; yet the Draft EIS states that the “Treasury Department gathered data on 81 potential sites.” Inconsistencies were noted between the Scoping Phase Report, internal inconsistencies within the Draft EIS chapters, and inconsistencies between the report and the multiple exhibits posted on the BEP Project web page.	Comment noted. Please refer to Responses to Comments 122 and 151. The data presented in the DEIS have been reviewed and are consistent. No change made to the FEIS.	Impact Analysis	Thomas E. Dernoga c/o Michelle Garcia Prince George's County Council
157	1	049	I am quite concerned about the November 2020 Draft EIS. There are two families of reason for concern. First is the general lack of detail. Many items are dismissed by 'feasible'. ex: lines 1664-6 "These design features would retain pre-development hydrology on the Project Site to the maximum extent technically feasible and minimize water pollution, including from sedimentation (see Section 3.7)." But section 3.7 does not state what results are considered feasible. Technology can restore much -- for a price. But nothing is stated as to how much money will be committed to this restoration (or in the many other items that will be pursued to 'feasible' extents), nor the results that will be achieved/required. The concern about lack of detail is amplified by the fact that a crucial reference link -- EISA section 438 -- is broken. There is little benefit to asserting compliance with a standard that is not made available.	Comment noted. The "maximum extent technically feasible" is the language used in Section 438 of the EISA. The links to Section 438 of the EISA on lines 1664 and 1754 of the DEIS were functional. Generally, the precise level of feasibility of specific actions cannot be determined until the Proposed Action design is more advanced. No change made to the FEIS.	Impact Analysis	Robert Grumbine
158	5	049	I note that I only particularly addressed the water because that is an area I know something about professionally. Since the report is so vague and implausible in this area I do know something about, I must also be concerned about other areas that seemed unlikely to be true -- such as no impact on historical, biological, archeological, or paleontological concerns. And a certain frustration: I have worked professionally with people who are or were in the USACE, and this report is nothing like the high quality work I am used to seeing.	Comment noted.	Impact Analysis	Robert Grumbine
159	5	050	Because of the aforementioned, along with other, environmental concerns and deficiencies of the draft EIS, I recommend that the EIS be reworked to include more alternatives, stronger cumulative effects analysis, and more inventory data and information of existing resources, and then re-distributed for public comment. The EIS as it currently is is inadequate and should result in an adequacy rating of 3 with Environmental Objections (EO) as the impact rating.	Comment noted.	Impact Analysis	Ross Geredien

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160	1	052	We hope you can accept our comments even though they are sent on December 22, 2020. Covid-19 has placed burdens on our operations that make it difficult to provide well considered comments on a prompt schedule. Environmental Review, Inc. has reviewed the Environmental Impact Statement Draft (DEIS), and has the following comments:	Comment noted.	Impact Analysis	Kobe Ramirez c/o Julian Grauer Environmental Review, Inc.
161	1	054	Thank you for the opportunity to review the Draft Environmental Impact Statement (DEIS) for the Bureau of Engraving and Printing (BEP) Currency Production Facility (CPF) located on a 100-acre parcel formerly part of the Henry A. Wallace Beltsville Agricultural Research Center (BARC) in Maryland. NCPC staff understands that the Department of Treasury, acting on behalf of BEP, proposes to construct and operate a new 24-hour CPF within the National Capital Region (NCR) to replace its existing production facility located in downtown Washington, DC. The Washington, DC production facility (DC Facility), built in 1914, has been in operation for more than 100 years. The DC Facility's condition and design limit the BEP's ability to modernize its operations and achieve its primary mission of producing increasingly technologically sophisticated US paper currency issued by the federal government. As the federal planning agency for the National Capital Region, NCPC has a review authority over federal projects located in the national capital region (40 USC§ 8722 (b)(1)). Our interest is to ensure the plan for this new facility is consistent with policies contained within the Federal Elements of the Comprehensive Plan for the National Capital (Comprehensive Plan). We generally support the DEIS analysis of the new CPF under consideration at a former BARC site in Maryland and recognize that the Department of Treasury has studied this issue for more than 20 years "...to address the inadequacy of its current facilities in the NCR. Most recently, between 2010 and 2018, Treasury studied the current status of currency note production, how to reduce its operational footprint within the NCR, and how to modernize its currency production operations." During this time Treasury explored various locations in the NCR, both private and public, to site this new facility. We understand that the BARC facility was eventually chosen because it met many mission requirements and was immediately available.	Comment noted.	Impact Analysis	Carlton Hart NCPC

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Comment #	Comment # by Reviewer	Commenter ID#	Comment	Response to Comment Blue Shading: Change made to the FEIS. Green Shading: No change made to the FEIS.	Topic(s)	Name	Organization (if applicable)
162	2	054	<p>NCPC staff is generally supportive of the preferred alternative in the DEIS which includes a one million-square-foot facility on a 100-acre parcel within the BARC campus; however, we also acknowledge that this project will move approximately 1500 federal jobs from the District to Maryland. The Federal Workplace Element of the Comprehensive Plan includes policies that support maintaining a majority of the region’s federal employees within the District. While this move will not single handedly change that overall distribution, it will reduce the number of jobs in the District. Based on the DEIS, NCPC staff understands the Department of Treasury’s decision to relocate to Maryland was based on the need to improve the existing currency production inefficiencies that are a result of operating in the constrained multi-floor historic site downtown.</p> <p>The requirements to modernize and make currency production more efficient include: a 100-acre parcel for the new facility, and the need for easy access to both highways and aviation networks. Given the change in location from the District to Maryland, NCPC will use the NEPA analysis to inform its review of the project and thereby requests that the DEIS adequately analyze impacts related to existing conditions and the proposed location. NCPC staff further note that every effort should be made to minimize impacts associated with the move to a less publicly accessible site and the change in land use at the BARC Campus. Our comments below focus on potential transportation, historic preservation, and natural resource impacts.</p>	Comment noted.	Impact Analysis	Carlton Hart	NCPC
163	12	054	<p>These comments have been prepared in accordance with NCPC's Transportation, Environmental and Historic Preservation Policies and Procedures. We refer the Department of Treasury to NCPC's Comprehensive Plan for the National Capital to reference policies and guidelines for which this project will be evaluated against. The Comprehensive Plan and other NCPC plans/policies can be found on our website at www.ncpc.gov; hard copies are available if needed.</p>	Comment noted.	Impact Analysis	Carlton Hart	NCPC
PM-3	2	032	<p>There is -- you know, really, I -- I've been working with NEPA for over 20 years, and I would consider this document to be grossly inadequate in the information you provided. It's more on the level of environmental assessment. And even for something that simple, it would be considered, in my opinion, to be grossly inadequate. It literally only got about 4 to 10 lines of information in the Wildlife section and the migratory birds. And the information is basically, I think, just dismissed in the sense that it's not considered to be significant. But your conclusory statement are not documented by any of the information you presented.</p>	Please refer to Response to Comment 135. Also, please refer to the Master Response provided under "Potential Impacts to Migratory Birds" in Section 9.0 of the FEIS.	Impact Analysis	Jeff Shenot	
PM-4	3	032	<p>So you need more information on the actual resources in the affected area, and you need more analysis on those resources, or at least some documentation of how you're drawing your conclusions of no significant impacts.</p>	Please refer to Response to Comment 135.	Impact Analysis	Jeff Shenot	

**Bureau of Engraving and Printing (BEP) Environmental Impact Statement (EIS)
Public Comments on Draft EIS - Comment Response Matrix**

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Section 3.0 - Impact Analysis - Perceived "Connected" Actions							
164	4	016	In many instances, the environmental effects associated with the three buildings that are still in use within the Project Site (BARC's Wildlife Office and two poultry buildings) for both the No Action and Preferred Alternatives are not addressed. For completeness, the environmental effects on these three buildings for each of the identified resources (e.g., land use, visual resources, air quality, etc.) should be addressed for both the No Action and Preferred Alternatives. The lack of these analyses is a deficiency in the DEIS and should be corrected in the Final EIS.	The USDA is planning to relocate the operations of these three buildings under a separate, independent action from the Proposed Action, regardless of the alternative selected by Treasury. Sections 2.3.3.3 and 2.4.1 of the FEIS were revised to clarify this. Therefore, the No Action Alternative assumes that no USDA operations would occur within the Project Site in the future. Treasury reviewed the FEIS to ensure that this is consistent under the No Action Alternative across all resource area analyses.	Connected Actions	Debbie McKinley	
165	5	016	In many instances, the environmental effects associated with the BEP Main Building and the BEP Annex Building for both the No Action and Preferred Alternatives are not addressed. For completeness, the environmental effects on these three buildings for each of the identified resources (e.g., land use, visual resources, air quality, etc.) should be addressed for both the No Action and Preferred Alternatives. The lack of these analyses is a deficiency in the DEIS and should be corrected in the Final EIS.	Please refer to the Master Response provided under "Perceived "Connected" Actions" in Section 9.0 of the FEIS. At the present time, Treasury does not have any specific proposals for its existing facilities under either the Preferred Alternative or the No Action Alternative that are "ripe" for analysis. The existing facilities are federal properties.	Connected Actions	Debbie McKinley	
166	60	016	(Figure 3.11-1) For completeness, the sanitary sewer that conveys wastewater from buildings within and surrounding the Project Site to the USDA WWTP should be shown in the figure. Also, the potential connection to the sanitary sewer should be shown in the figure.	Please refer to the Master Response provided under "Perceived "Connected" Actions" in Section 9.0 of the FEIS.	Connected Actions	Debbie McKinley	
167	63	016	(Line 2478) The anticipated environmental impacts of the construction of the approximately one mile of new force main to tie into the USDA's existing sanitary sewer system south of the Project Site should be discussed for completeness.	Please refer to the Master Response provided under "Perceived "Connected" Actions" in Section 9.0 of the FEIS.	Connected Actions	Debbie McKinley	
168	5	039	Finally, the City is particularly concerned that the analysis of Treasury's Preferred Alternative does not account for all Project impacts. The limits of disturbance do not include all areas that will be disturbed and the DEIS does not consider the impact of all necessary actions, including utility work and transportation mitigation. The full scope of the Project should be clarified, and all impacts resulting from all aspects of this Project must be addressed. The DEIS should clarify how the Project will comply with Section 404 of the Clean Water Act. If this project will result in the implementation of additional actions (e.g., the widening of Kenilworth Avenue to accommodate increased traffic), this must be made clear and any associated impacts should be addressed in the DEIS and covered under the same permit as the Project. Further, the assessment of cumulative effects is grossly insufficient. Additional investigation should be performed and justification provided for assessments pertaining to the cumulative effects of the Proposed Action and other past, present, and reasonably foreseeable future actions, particularly in terms of impact on the BARC Historic District, land use on BARC and on the surrounding community, wetlands and waterways (with particular consideration of impact to Beaver Dam Creek, Indian Creek, and impact to wetlands which falls below mitigation thresholds), wildlife habitat, transportation, and climate change (including consideration of possible reductions in transit use due to Project implementation), and adequate mitigation or impact-reduction measures should be proposed to address cumulative impacts of the Project. The City is particularly concerned about the proposed MAG LEV project, the I-270 /I-495 Managed Lanes project, and the possible widening of MD-201 and the Beltway, but a thorough accounting of all relevant projects should be provided.	Please refer to the Master Response provided under "Perceived "Connected" Actions" in Section 9.0 of the FEIS. Also, please refer to the Cumulative Effects analysis presented in Section 4.0 of the FEIS and Response to Comment 476.	Connected Actions Cumulative Effects	Holly Simmons	City of Greenbelt

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Comment #	Comment # by Reviewer	Commenter ID#	Comment	Response to Comment Blue Shading: Change made to the FEIS. Green Shading: No change made to the FEIS.	Topic(s)	Name	Organization (if applicable)
169	62	039	Impacts of transportation mitigation are not addressed. Per the TIS, proposed transportation mitigation will add over 340,000 square feet (i.e., approximately 8 acres) of new impervious surface for roadways. This concern is further outlined in the "Connected Actions" section of this memo.	Please refer to the Master Response provided under "Perceived "Connected" Actions" in Section 9.0 of the FEIS.	Connected Actions	Holly Simmons	City of Greenbelt
170	89	039	Wetlands near possible transportation mitigation do not appear to have been field-delineated.	Please refer to the Master Response provided under "Perceived "Connected" Actions" in Section 9.0 of the FEIS.	Connected Actions	Holly Simmons	City of Greenbelt
171	106	039	XIX. Connected Actions 40 C.F.R. § 1508.25 (2019) requires that the DEIS include "connected actions". Actions are considered to be connected actions if they: 1) automatically trigger other actions which may require environmental impact statements; 2) cannot or will not proceed unless other actions are taken previously or simultaneously; 3) are interdependent parts of a larger action and depend on the larger action for their justification. The DEIS does not evaluate the impact of connected actions at BEP's existing facilities once currency production is transitioned to the proposed CPF. Additionally, potential costs associated with the existing facility do not appear to be reflected in the DEIS. The 2018 GAO report states, "The ability to sell or repurpose any part of the current D.C. facility could affect the total federal costs of BEP's actions."	Please refer to the Master Response provided under "Perceived "Connected" Actions" in Section 9.0 of the FEIS.	Connected Actions	Holly Simmons	City of Greenbelt
172	107	039	The DEIS also does not evaluate the impact of connected actions associated with possible transportation mitigation at the intersections listed in the Traffic and Transportation section of this memo. It is anticipated that these measures would result in impacts to additional off-site areas, but they are not analyzed in the DEIS. It appears that decisions regarding specific mitigation to be implemented with the Proposed Action have not yet been agreed upon. The EPMs, RCMs, and BMPs do not include the specific mitigation required to address failing intersections. Instead, a generalized list of typical intersection design measures is included in the DEIS as "mitigation measures" that Treasury should design and implement for the intersections anticipated to experience significant adverse impacts.	Please refer to the Master Response provided under "Perceived "Connected" Actions" in Section 9.0 of the FEIS.	Connected Actions	Holly Simmons	City of Greenbelt
173	108	039	The DEIS does not appear to include information regarding any on-site investigation of transportation mitigation areas' existing conditions, nor does it provide an analysis of the proposed mitigation's impact on resources. For example, wetlands depicted in TIS mitigation figures appear to be based on Fish and Wildlife Service National Wetlands Inventory (USFWS NWI) data, without the benefit of field-verification. Field work identifying all environmental features should be completed prior to, and made available with, the DEIS. Treasury should coordinate with the County to determine which mitigation measures would be implemented under the Proposed Action. If transportation mitigation will result in impact to wetlands, the impact should be considered under the same permit as other wetlands impacts.	Please refer to the Master Response provided under "Perceived "Connected" Actions" in Section 9.0 of the FEIS.	Connected Actions	Holly Simmons	City of Greenbelt

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174	114	039	The LOD does not appear to provide for utility work. The project will include utilities installation and relocation, including relocation and reconnection of an existing USDA water line around the project site, and installation of approximately one mile of new force main that would tie into the USDA's existing sanitary sewer system south of the project site. Proposed utility locations and tie-ins must be clearly located and the LOD must be adjusted to account for their installation.	Please refer to the Master Response provided under "Perceived "Connected" Actions" in Section 9.0 of the FEIS.	Connected Actions	Holly Simmons City of Greenbelt
175	115	039	The LOD may also need to be adjusted to account for stable outfalls and rehabilitation of impacted assets.	Please refer to the Master Response provided under "Perceived "Connected" Actions" in Section 9.0 of the FEIS.	Connected Actions	Holly Simmons City of Greenbelt
176	116	039	As previously noted, the DEIS does not account for impact due to off-site work. No LOD is shown for transportation mitigation.	Please refer to the Master Response provided under "Perceived "Connected" Actions" in Section 9.0 of the FEIS.	Connected Actions	Holly Simmons City of Greenbelt
Section 3.2 - Land Use						
177	1	002	Thank you for submitting your project for intergovernmental review. Participation in the Maryland Intergovernmental Review and Coordination (MIRC) process helps ensure project consistency with plans, programs, and objectives of State agencies and local governments. MIRC enhances opportunities for approval and/or funding and minimizes delays by resolving issues before project implementation. Maryland Gubernatorial Executive Order 01.01.1998.04, Smart Growth and Neighborhood Conservation Policy, encourages federal agencies to adopt flexible standards that support "Smart Growth." In addition, Federal Executive Order 12072, Federal Space Management, directs federal agencies to locate facilities in urban areas. Consideration of these two Orders should be taken prior to making final site selections. A copy of Maryland Gubernatorial Executive Order 01.01.1998.04, Smart Growth and Neighborhood Conservation Policy is available upon request. We have forwarded your project to the following agencies and/or jurisdictions for their review and comments: the Maryland Departments of Natural Resources, the Environment, Transportation, General Services, and Agriculture; Prince George's County; the Maryland-National Capital Park and Planning Commission in Prince George's County; and the Maryland Department of Planning, including the Maryland Historical Trust. A composite review and recommendation letter will be sent to you by the reply due date. Your project has been assigned a unique State Application Identifier that you should use on all documents and correspondence. Please be assured that we will expeditiously process your project.	Comment noted. EO 12072 was added to Table 1 in the Land Use Technical Memorandum . Maryland Gubernatorial Executive Order 01.01.1998.04 is not directly applicable to the Proposed Action.	Land Use	Sylvia Mosser MD State Clearinghouse
178	1	003	I am generally supportive of this project. Since the last in question already has decaying buildings on it, this is a reasonable use of the land.	Comment noted.	Land Use	John Ausema

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179	3	010	There seems to be no basis for the finding that changing from a rural to an industrial land use has no impact worth studying. That is preposterous. This project opens up a highly protected landscape for other wholly inappropriate development including the MAGLEV project that is also proposed in this rural biodiversity refugeum. The long term impact of this sort of land use change on the regional ecosystem is not addressed in this very limited EIS process but is the most important impact of this project. This project will permanently alter the character of this region and set a precedent for further deterioration.	Comment noted. The Project Site for Treasury's Preferred Alternative is currently under federal ownership and inaccessible to the general public without the USDA's expressed permission; if the Preferred Alternative is implemented, the Project Site would remain under federal ownership and accessible to the public only in certain instances. As discussed in Section 3.2.2.2 of the EIS, Treasury does not anticipate that any adjacent land uses (i.e., outside the Project Site) would be discontinued as a result of the Proposed Action. Further, this Proposed Action would have no effect on the availability of BARC land for use by other non-USDA federal agencies, as those property transfers would require Congressional approval. Potential impacts to other resource areas (e.g., noise, air quality, biological resources, etc.) that could affect nearby properties are thoroughly discussed in Section 3.0 of the EIS. Finally, potential cumulative impacts are discussed in Section 4.0 of the EIS and in the Cumulative Effects Analysis Technical Memorandum ; the cumulative impacts analysis considered the proposed MAGLEV project and analyzed cumulative biological resources impacts. No change made to the FEIS.	Land Use	Carolyn Mitchell	
180	5	014	The DEIS adequately addresses my other concerns. It makes me sad, though, to see more of our federal open space turned into an industrial site, no matter how carefully it's done.	Comment noted.	Land Use	Deanna Dawson	
181	44	016	(Lines 1133-1135) The reasoned basis for this determination is not provided. As defined, less-than significant adverse impacts would not exceed the significance thresholds specified for the resource area. What are the specific significance thresholds against which the land use impacts under the No Action Alternative are compared to arrive at the stated determination? What are the expected adverse impacts on land use anticipated due to the continued deterioration of existing facilities and why specifically are these impacts less-than significant? A reasoned basis for this determination should be provided.	As noted in the last paragraph of Section 3.1.3 of the EIS, significance criteria are provided in each resource-specific Technical Memorandum (e.g., Section 1.3.1 of the Land Use Technical Memorandum). Section 3.2.2.1 of the FEIS was revised to note that building deterioration contributes to blight that could affect other nearby properties, but would be unlikely to result in the discontinuation of or substantial change in adjacent land uses.	Land Use	Debbie McKinley	
182	45	016	(Lines 1146-1147) The specific ways nearby land uses would be affected by construction should be clearly identified for completeness.	Comment noted. This information is provided in Section 1.3.3 of the Land Use Technical Memorandum . No change made to the FEIS.	Land Use	Debbie McKinley	
183	46	016	(Lines 1147-1149) The specific ways land use impacts on nearby public areas will be mitigated by obstructing views of the construction area should be identified for completeness. The mitigation measure of temporary privacy fencing would appear to mitigate visual resources rather than land use.	Section 3.2.2.2 of the FEIS was revised to note that obstruction of construction views provides a greater sense of separation between existing land uses and the active construction site.	Land Use	Debbie McKinley	
184	47	016	(Lines 1149-1151) Although similar construction activities to the Proposed Action have occurred within the ROI, construction of the Proposed Action does not appear to be typical for BARC. This more localized impact on BARC should be addressed for completeness.	Comment noted. While the proposed construction may not typically occur within BARC, land use is analyzed for the overall ROI, not specific locations within the ROI. No change made to the FEIS.	Land Use	Debbie McKinley	

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185	48	016	(Lines 1161-1162) Although Treasury’s operational activities in its proposed parcel may be consistent with other industrial facilities in the ROI in terms of intensity, the intensity of Treasury’s activities does not appear to be typical for BARC. This more localized impact on BARC should be addressed for completeness.	Comment noted. While the proposed operational activities may not typically occur within BARC, land use is analyzed for the overall ROI, not specific locations within the ROI. No change made to the FEIS.	Land Use	Debbie McKinley
186	1	019	The Draft Environmental Impact Statement is for the Bureau of Engraving and Printing, Currency Production Facility preferred location within the Beltsville Agricultural Research Center. This facility will replace the existing facility located in downtown Washington D.C., which has been deemed obsolete. The project will ultimately transition approximately 1600 personnel to the Prince George's County location. This is consistent with Plan Prince George's 2035 General Plan in regard to establishing an Innovation Corridor to include the Beltsville Agricultural Research Center. ‘This area has the highest concentrations of economic activity in our four targeted industry clusters and has the greatest potential to catalyze future job growth, research, and innovation in the near- to mid-term. This area is also well positioned to capitalize on the synergies that derive from businesses, research institutions, and incubators locating in close proximity to one another and on existing and planned transportation investment, such as the Purple Line.’ (http://planpgc2035.org/202/Innovation-Corridor).	Comment noted.	Land Use	c/o Sylvia Mosser MD Department of Planning
187	1	026	Thank you for the opportunity to comment on the Draft environmental impact statement (DEIS). I am a long-time resident of <redacted>. I am very much concerned with the potential siting of an industrial facility on the Beltsville Agricultural Research Center (BARC). In this regard, the Parks and Open Space Element of the Federal Elements of the National Capital Planning Commission (NCPC) Comprehensive Plan for the National Capital includes BARC as part of the National Capital Region park and open space system. (Federal Elements, Parks and Open Space Elements at 3-4.) BARC is specifically identified as an example of a campus that “functions as a natural habitat area.” (Id. at 3.) The Federal Environmental Elements state that the federal government should “[d]iscourage development or significant alteration of areas used by wildlife, including migratory wildlife.” (Federal Elements, FE.H.2).	Comment noted. Table 1 in the Land Use Technical Memorandum notes that BARC is part of the NCPC's identified parks and open space network. Potential impacts to wildlife and habitat that could result from the Proposed Action are discussed in Section 3.8 of the FEIS. Treasury is consulting with NCPC for this Proposed Action with respect to the NCPC Comprehensive Plan. Table 2.1-1 of the FEIS was revised to include a Biological Resources EPM/RCM to consider the design guidelines outlined in Section H of the NCPC Comprehensive Plan Federal Environment Element.	Land Use Biological Resources	Clara Kuehn

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188	2	026	<p>Land Use and Zoning</p> <p>The Federal Elements include specific directives to agencies to “preserve and maintain ... open space on federal campuses that support wildlife habitat” (Federal Elements, POS.B.6) and “[c]onserve portions of federal campuses ... that add significantly to the open space system” (Federal Elements, POS.D.11). Not only is the BARC parcel in question recognized as part of the open space system by the NCPC, it is currently zoned “reserved-open-space.”</p> <p>The claim in the DEIS that the siting of an industrial facility on this property would have “less than significant” or “no negligible impact” on land use and zoning can only be understood as willful blindness. An industrial facility is patently incompatible with reserved-open-space zoning and with open space supporting wildlife habitat. The construction and operation of such a facility subverts regional land use policies (as evidenced by the suggested “mitigation” of obtaining a zoning reclassification to “industrial”) and can only encourage similar uses leading inexorably to degradation of the remaining open space on the BARC campus -- contrary to federal policy directing agencies to preserve and maintain these spaces.</p>	<p>Comment noted. The FEIS acknowledges that the Proposed Action would be incompatible with existing zoning and regional land use plans. However, while land use on Treasury's proposed parcel would change, it would be unlikely to substantially alter land use on adjacent properties. As described in Section 2.4.2 of the FEIS, Treasury would continue to apply its guiding principles for the design of the proposed CPF as described in Section 2.2.1 to focus on deference to the historic nature of the Project Site, integrating the proposed CPF into the natural landscape to minimize its visibility from public off-site areas, being a good neighbor to adjacent residential communities, prioritizing sustainability, and creating an institutional identify appropriate for the BEP. Additionally, land transfers from BARC require independent Congressional authorization, so Treasury's Proposed Action would not lead to future degradation of the BARC campus. Finally, please also refer to Responses to Comments 179 and 36.</p>	Land Use	Clara Kuehn
189	3	026	<p>Although the DEIS specifically acknowledges that BARC “is included in Prince George’s County Priority Preservation Area and the NCPC’s regional parks and open space network” and “[c]onverting Treasury’s proposed parcel to industrial land use would conflict with these local policies and associated planning goals,” it dismisses these concerns by myopically focusing on counting agricultural acreage. The invocation of “mixed” land uses west of Edmonston Road is singularly unhelpful as those properties are not part of BARC, are not part the open space network, and are not subject to reserved open space zoning.</p>	<p>Comment noted. Treasury evaluated agricultural and other land use acreages in Section 3.2.2.2 of the EIS to incorporate a quantitative analysis. Please also refer to Responses to Comments 188 and 198. No change made to the FEIS.</p>	Land Use	Clara Kuehn
190	7	027	<p>Finally, I live within walking distance of BARC and I am concerned about the potential negative impact on BARC as an institution given its stature as a premier agricultural research facility with paramount importance to our country and farm economy. The research done at BARC has been, and is why, the United States is a leader in food production and agricultural innovations.</p>	<p>Comment noted. Please refer to Response to Comment 204.</p>	Land Use	Philip S. Aronson
191	1	035	<p>I have lived by the BARC "farm" for 22 years. The rural beauty is one of the reasons we bought a home here, sandwiched between the Patuxent Wildlife Refuge and the BARC fields, pastures, barns and woodlands. Relocating an engraving and printing plant onto the BARC land would ruin the area.</p>	<p>Comment noted. Please refer to Section 3.2 of the FEIS for the land use impact analysis.</p>	Land Use	Lucy Carter

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192	22	039	The ROI for Land Use which, like the bicycle impact ROI, is a one-mile Euclidean buffer on the project site, including the area of the proposed roadway. CEQ's publication, Considering Cumulative Effects Under the National Environmental Policy Act (CEQ, 1997), provides possible geographic boundaries for different environmental resources. For Land Use, the geographic boundaries suggested include "Community, metropolitan area, county, state, or region." The ROI identified does not correspond to any of these suggestions and does not reflect any unified geographic area, and therefore appears arbitrary. As the project site is located in the National Capital Region and in Maryland, the City believes it would be useful to use three Land Use ROIs: 1) an NCR ROI, 2) an ROI based on relevant Maryland case law to determine a cohesive and defensible neighborhood, and 3) BARC's Central Farm. Maryland rezoning case law indicates that neighborhoods should be determined by patterns of development, physical boundaries, and existing natural features that appear to be natural breaking points.	Comment noted. Please refer to Response to Comment 203.	Land Use	Holly Simmons City of Greenbelt
193	28	039	VII. Land Use and Zoning The DEIS claims that the Proposed Action would result in less-than-significant impacts or no or negligible impact on land use and zoning. The City believes this to be an inaccurate characterization, based in part on inappropriate identification of the ROI. The City strongly believes the Proposed Action would result in a significant adverse impact on surrounding land uses from construction activities; a significant adverse impact on land use and local planning objectives from the conversion of agricultural land to industrial land, the reversal of many local and state land use policies, and lack of conformance with the mission of BARC; and a significant adverse impact on local zoning.	Comment noted.	Land Use	Holly Simmons City of Greenbelt
194	29	039	The Proposed Action would not be in keeping with the general character and mission of BARC. BARC serves the area as a critical environmental and open space resource, a National Register-eligible historic resource, a major employer, and a location for anticipated growth in research and development activities. The project site is located in the 2,980-acre Central Farm, BARC's oldest and largest farm. Most of the buildings and landscape of the Central Farm were developed between 1911 and 1944. The Central Farm has approximately 12 clusters of buildings situated on approximately 336 acres along with pastures, wetlands, and forested areas used for animal husbandry, production crops, animal and plant research, and wildlife management. County and state policies and regulations strongly discourage development of BARC, as its unique mission of agricultural research allows for both economic benefits and environmental preservation.	Comment noted. Please refer to Response to Comment 188.	Land Use	Holly Simmons City of Greenbelt
195	30	039	The Proposed Action would not conform to R-O-S purpose or uses. The DEIS accurately states that development on federal sites is not subject to local zoning; however, the proposed BEP facility would clearly not conform with the purpose of the R-O-S zone. The DEIS fails to provide a complete discussion of the Proposed Action in terms of the site's R-O-S zoning and intended purpose. It frequently refers to the existing zone as "Residential" (the broader category under which the R-O-S zone is situated) which does not clearly reflect the purpose and uses of the R-O-S zone.	Comment noted. Section 3.2.2.2 of the FEIS identifies that Treasury's operations would be incompatible with existing zoning. No change made to the FEIS.	Land Use	Holly Simmons City of Greenbelt

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196	31	039	The Proposed Action would undermine established planning policies. Many policies at the County and State level prioritize the preservation of prime agricultural land and the redevelopment of existing sites. The project site is located within the County’s Priority Preservation Area (PPA), Growth Tier IV3, the Plan Prince George’s 2035 Rural and Agricultural Policy Area, and the M-NCPPC Subregion 1 Master Plan Rural Tier4. Additionally, the Land Use Article § 25-211 of the Maryland Annotated Code stipulates, “If the United States Department of Agriculture sells any portion of the property known as the Beltsville Agricultural Research Center, the district council shall place and permanently maintain the land in a zoning classification of agricultural open space immediately after the transfer of the land to the buyer.”	Comment noted. Please refer to Response to Comment 188. Additionally, per the Agriculture Improvement Act of 2018, the Project Site would be transferred from one federal agency to another, and would not be sold.	Land Use	Holly Simmons	City of Greenbelt
197	32	039	The Proposed Action would establish a precedent for future actions with significant effects. The DEIS does acknowledge that BARC is included in the County’s PPA and the NCPC’s regional parks and open space network, and conversion of this site to industrial land use would conflict with these policies; however, it fails to recognize the significance of the precedent that the Proposed Action would set in reversing these policies. Additionally, the City is concerned that Proposed Action would justify future actions on BARC that are inconsistent with BARC’s mission. It is possible that development such as this will lead to further encroachment of incompatible uses onto BARC, such as the MAGLEV train maintenance yard. NEPA regulations require that the significance of proposed actions be based on both context and intensity, and one of the considerations in evaluating intensity is “The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.” The DEIS fails to take this into consideration.	Comment noted. Please refer to Response to Comment 179.	Land Use	Holly Simmons	City of Greenbelt
198	33	039	The DEIS mischaracterizes the ROI. The analysis characterizes the ROI as an “established mixed-use community” and states that construction of the Proposed Action would be typical for the area, as “similar construction activities to the Proposed Action have occurred within the ROI throughout the past several decades.” DEIS, 3-7. It proves difficult to determine what “similar construction activities” the DEIS is referencing. Based on a review of aerials, to find any non-residential development within the past 20 years in the identified ROI, one must look half a mile away from the project site on the west side of Edmonston Road. A more sensitive construction of the ROI would eliminate areas west of Edmonston Road from this analysis, thereby eliminating most if not all of the industrial and commercial uses as well.	Comment noted. Based on historical aerial imagery, several construction projects have occurred between Edmonston Road and US Route 1 over the last two decades. Eliminating these areas from the ROI would mischaracterize the ROI by not acknowledging the close proximity of the Project Site to established industrial and commercial areas, and the significant presence that these areas have in the local land use composition. Section 3.2.2.2 of the FEIS was revised to remove the statement about similar construction activities occurring within the past several decades, as this is not pertinent to the significance determination.	Land Use	Holly Simmons	City of Greenbelt
199	34	039	Additional documents should be provided. To enable a more comprehensive understanding of land use planning at BARC, Treasury and USDA should make available the 1979 Beltsville Agricultural Research Center Master Plan and all updates, including the 1996 Master Plan Update Master Plan Report, which is included in the DEIS reference list. Additionally, depending on the year in which this plan was last updated, BARC could consider updating the plan.	Comment noted. The project website was updated to identify that the 1996 update of the BARC Master Plan can be provided upon request. No change made to the FEIS. An update to the BARC Master Plan would be the responsibility of the USDA.	Land Use	Holly Simmons	City of Greenbelt

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200	5	040	Physical facility and Zoning. The physical facility a massive 1 million square foot, 40 to 50 foot high INDUSTRIAL facility is absolutely inappropriate usage for a rural agriculturally open-space zoned area. To capriciously state that the desires of the residents of Prince George's County for this to be zoned R-O-S will be changed by waving a wand by the Federal government is arrogant and inappropriate. The days plantation masters telling elderly, poor, and minorites that this will be good for them are over. Certainly adjustments to the design including lowering the height to 1-story with offices in an underground floor would be more appropriate and less offensive.	Comment noted. Please refer to Response to Comment 36 and 188.	Land Use	Melissa Daston
201	2	042	Unfortunately since my 20's BARC has been under attack. I have watched politicians from both parties chip away at the CROWN JEWEL of Beltsville, Prince George's County and Maryland. Different programs have been moved to other parts of the country. This has put the remainder of BARC at risk. Every 7-10 years someone wants to move all of BARC from Beltsville. We are having this discussion because the site under consideration lost the previous Research Program was moved to another state. Leaving the land and the buildings vacant. As President of the Beltsville Citizen's Association I have worked with Congressman Hoyer to keep BARC here everytime someone has wanted to sell off all or some of BARC!	Comment noted.	Land Use	Karen Coakley
202	2	044	As detailed in the DEIS, the existing current production facility has numerous inefficiencies, lacks flexibility for new production processes required to support currency redesign efforts and does not comply with modern physical security standards. Treasury's need for a replacement facility is clear, but the introduction of the large industrial facility to BARC presents a number of challenges, given the mission, historic nature, and landscape of BARC. We understand that Congress authorized the U.S. Department of Agriculture (USDA) to transfer this property to Treasury through the Agriculture Improvement Act of 2018. However, as acknowledged in the DEIS, the introduction of the proposed CPF would obstruct the "historically and aesthetically valued vista/viewscape." Further, the construction of a secure manufacturing facility in the historic agricultural research campus presents a use that does not appear to be contemplated by local planning and represents a substantial change for residents and employees. As outlined in the Land Use section and technical report, BARC is generally considered protected land and/or open space in local planning. The proposed industrial use appears to conflict with these plans and zoning. Siting such a facility at this location requires not only careful evaluation of the significance of the impacts, but also consideration of minimization of impacts.	Comment noted. Please refer to Response to Comment 188.	Land Use	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment

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203	9	044	<p>Land Use</p> <p>Land use is an area that requires careful evaluation, as the Proposed Action would permanently convert lands from agricultural production and research to industrial manufacturing. We recommend further consideration of both the Region of Influence (ROI) and the significance of impacts for this resource.</p> <p>The site is located in the Central Farm section at the northern boundary of BARC. The ROI identified for the land use analysis is the Project Site and areas within one mile. We recommend the FEIS clearly connect the ROI to land use at a local and regional scale. Specifically, we suggest evaluating the impacts in the context of the Central Farm and the adjacent properties, as part of BARC, and in the larger National Capital Region.</p>	<p>Comment noted. Section 3.2.1.1 of the FEIS was revised to clarify that areas beyond 1 mile from the Project Site would not experience impacts that could meaningfully affect land use. As described in Section 3.2, the Proposed Action could potentially affect land use locally. However, the Project Site is located in close proximity to other commercial and industrial land uses, and in an urban area regionally, and thus would not have far-reaching land use impacts. Relative to BARC itself, Treasury's proposed parcel is not required by the USDA to fulfill its mission. Further, the land use would remain under federal control and with very limited public access. Section 3.2.2.2 acknowledges that the Proposed Action would be inconsistent with local land use plans that identify BARC as a priority preservation location; however, the Proposed Action would be consistent with other local plans that identify the BARC area as an economic and innovation focal area.</p>	Land Use	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
204	10	044	<p>We note that the development of lands at BARC does not just represent loss of valuable prime farmland and farmland of statewide importance for agricultural production, but also would permanently eliminate lands for agricultural research, which is not a common use. We recommend expanding the discussion to further address the potential loss of land for agricultural experimentation.</p>	<p>Comment noted. Section 3.2.2.2 of the FEIS was revised to discuss not only the loss of cropland at BARC, but also the loss of land for agricultural research activities. However, the USDA has indicated that the USDA at BARC does not need, and plans to discontinue operations in, this particular parcel.</p>	Land Use	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
205	11	044	<p>The DEIS indicates that adverse impacts on land use and local planning objectives are less-than-significant, but the Proposed Action conflicts with both current zoning and regional plans. BARC is listed as a Priority Preservation Area and is considered "permanently preserved" in Prince George's County Priority Preservation Area Functional Master Plan. Plan Prince George's 2035 - Approved General Plan indicates that sprawl is a serious issue as the County experienced a 6.3 percent decrease in prime agricultural and resource lands between 2002 and 2010 and the loss continues. As described, converting the site to industrial land use would conflict with local plans and associated planning goals. While state and local agencies cannot regulate land use on federal property, the purpose of these plans is to strategically balance land use, including identifying areas to locate future development and growth and to preserve agricultural areas and open spaces. It is recommended that the FEIS acknowledge the adverse effects and commit to approaches to minimize and mitigate or offset the impacts of the proposed land use change for the region.</p>	<p>Comment noted. Please refer to Response to Comment 188.</p>	Land Use	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
206	12	044	<p>As outlined in the Land Use Technical Memorandum, Treasury defined a significant adverse impact as one that would "result in a new land use that would result in discontinuation of or substantial change in existing adjacent land uses, or induced activities within the ROI, but beyond the Project Site, that are inconsistent with existing zoning designation(s)." We recommend reconsideration of this criteria, and clarification of the language and intent. It is unclear how a substantial change in existing land use at the site that conflicts with local zoning and several regional plans does not represent a significant adverse impact on the resource.</p>	<p>Comment noted. While Treasury would use the Project Site for non-agricultural/preservation purposes, it would have limited impact on the land use of all surrounding areas. No change made to the FEIS.</p>	Land Use	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment

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207	2	045	It is my understanding that the BEP has selected an unused 100-acre parcel of land at the 6,500-acre Beltsville Agricultural Research Center as its preferred location for the \$1.4 billion CPF that includes up to \$400 million of new equipment. The CPF would include a new 1 million square foot one-story facility which is projected to employ a workforce of approximately 1,600 employees working over three-shifts. According to the DEIS the current BEP production workforce, approximately sixty-eight (68) percent reside in Maryland and thirty-one (31) percent in Prince George’s County. The County has adopted, and is updating, an overall economic development policy, entitled “A Targeted Economic Development Strategic Plan for Prince George’s County”, focusing on specific development plans to advance targeted industry clusters likely to drive economic growth in the County – including additional opportunities for the Federal Government relocation and expansion. The potential relocation of the Replacement Currency Production Facility (CPF) at the Beltsville Agricultural Research Center (BARC) falls squarely within the County’s economic development strategy.	Comment noted. Sections 3.2.1.2 and 3.2.2.2 of the FEIS were revised to incorporate this plan and identify the Proposed Action's consistency with it.	Land Use	Todd M. Turner County Council Member, 4th District Prince George's County Council
208	3	045	With respect to the DEIS itself, I provide the following summary comments on each of the following keys impacts for the areas reviewed in the DEIS: Land Use Since the proposed property is currently zoned “Residential – Reserved Open Space” (R-O-S) under the Prince George’s County Zoning Ordinance, if the land is transferred between the U.S.D.A. and Treasury as recommended, Treasury should engage the Prince George’s County Planning Department and the County Council for a potential change to the uses and/or zoning for the property to meet the expected uses of the CPF.	Comment noted. Treasury identified a recommended mitigation measure to petition Prince George’s County for a zoning reclassification of its proposed parcel (see Section 3.2.3 of the FEIS). No change made to the FEIS.	Land Use	Todd M. Turner County Council Member, 4th District Prince George's County Council
209	1	046	I would like to submit the following comments concerning the Draft of the BEP EIS: 1. I oppose the relocation of the BEP to the BARC as this facility does not meet the current zoning for this site.	Comment noted.	Land Use	Albert Klein
210	9	046	As a <redacted> I believed that the surrounding area would always be maintained as a natural Greenbelt Space. I do not believe a 24-hour 365 Days a Year facility operation such as the BEP is appropriate for this proposed site. I appreciate the opportunity to submit my comments.	Comment noted.	Land Use	Albert Klein
211	1	047	I am writing in support of the NO ACTION ALTERNATIVE. The proposed BARC building site is inappropriate for this project as it is part of the existing agricultural research facility. The only reason that the BARC building site is being considered is that BARC has been chronically underfunded, however the solution to this problem is to properly fund the agricultural research our nation needs. Building a 100-acre industrial facility there would preclude use of this land for agricultural research once the funding issue is resolved. Section 3.6.1.3 of the DEIS documents that “the Project Site contains approximately 59.3 acres of prime farmland and 27.2 acres of farmland of 1636 statewide importance”; we can not afford to destroy this resource.	Comment noted.	Land Use	Benjamin Fischler

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212	8	048	Land Use. The location of a heavy industry in a residential-open-space (R-O-S) zone and on the Beltsville Agricultural Research Center is contrary to the purpose of the proposed location. Replacing a 100+ acre agricultural property [referred to as 104 acres and 122 acres in the Draft EIS] with heavy industry to include bulk chemical storage, hazardous material, and flammable materials is a significant departure from the existing usage. Further, the proposed facility is to be 40-50 feet high (2-3 stories) which is a complete departure from existing facilities on the BARC property and industrial facilities adjacent to the BARC property in Beltsville. Yet the report characterizes this change as having a less-than-significant adverse impact to local zoning, and states that as a Federal facility, a zoning change is not required – in essence ignoring the existing zoning is a right regardless of what the County and its residents have approved.	Comment noted. Section 3.2.2.2 of the FEIS identifies that Treasury's operations would be incompatible with existing zoning. No change made to the FEIS.	Land Use	Thomas E. Dernoga c/o Michelle Garcia	Prince George's County Council
PM-19	2	109	Second thing is I agree with Councilman Rodney Roberts and another person that opposed this project because it's out of compliance with the existing zoning regulations, and I don't think an industrial operation like this would even go for the exception that the classification allows for "a limited range of public recreational and agricultural uses." It doesn't seem like an industrial operation like that being proposed fits into that category.	Comment noted. Section 3.2.2.2 of the FEIS identifies that Treasury's operations would be incompatible with existing zoning. No change made to the FEIS.	Land Use	John Lipart	Chair of the Greenbelt Green Team
PM-23	3	110	BARC could exist as an agricultural research center. There have been -- I can't quantify the number of improvements that could be cited from research done there, but there has been many. And I'd like to think that, in the future where there certainly will be a need for agricultural research, BARC also could be used to center -- invite Future Farmers of America in for an internship once a year where they could see firsthand the nature of agricultural research being conducted and, indeed, have the opportunity as future farmers to take advantage of Beltsville's proximity to Washington, D.C., and have the opportunity to go in and lobby Congress about what's in the interest of Future Farmers of America.	Comment noted.	Land Use	Bill Orleans	
Section 3.3 - Visual Resources							
213	8	010	The visual resources analysis is completely inadequate. The views show no change. There would be significant changes to the roads and to the topography in order to create a flat development site. These changes are not depicted. The before and after images offer no basis for evaluating this impact.	Comment noted. The Proposed Action would not substantially change existing topography (see Section 3.6 of the FEIS). Please also refer to Response to Comment 241.	Visual Resources	Carolyn Mitchell	
214	1	014	The proposed facility's night-time lighting was mostly addressed as to its effect on residences along Odell Road. It's a concern too to Greenbelt residents and others who long have taken advantage of BARC's relatively dark skies as a locale for 'star-gazing'. I urge that to the extent possible lighting around the facility be directed downwards rather than upwards. This will also benefit nocturnally migrating birds in spring and fall, who seek dark places to land before dawn and can be confused by night lights.	Comment noted. Mitigation measures included in Section 3.3.3 of the FEIS consider the use of directional lighting at the proposed facility to limit light pollution outside of the Project Site. Additionally, Table 2.2-1 was revised to include an EPM that Treasury would consider the International Dark Sky Association's five principles for responsible outdoor lighting in the design of the Proposed Action.	Visual Resources	Deanna Dawson	

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215	49	016	(Section 3.3) The number and location of viewpoints appears inadequate to fully evaluate the visual impacts of the Preferred Alternative. No viewpoints associated with the BARC buildings located along Animal Husbandry Road or North Dairy Road are addressed.	Comment noted. As discussed in Section 1.1 of the Visual Resources Technical Memorandum , the visual resources analysis focuses on visual quality from the perspective of accessible, public views located off-site. Animal Husbandry Road and North Dairy Road are roads specific to USDA operations; these would not be typical views for members of the public. Please also note that the view from North Dairy Road is included in Section 1.3.1 of the Cultural Resources Technical Memorandum as on-BARC views are relevant for the analysis of potential adverse effects to the BARC Historic District. No change made to the FEIS.	Visual Resources	Debbie McKinley	
216	50	016	(Line 1235) No basis for the assertion that the most prominent views of the Project Site occur along short segments of Odell Road and Powder Mill Road is provided. Why are these views considered more prominent than those from the BARC buildings along Animal Husbandry Road? The viewpoint from the BARC buildings has the potential to be more prominent than the viewpoint along Powdermill Road (see Viewpoint 6). A reasoned basis for the assertion should be provided.	Comment noted. Please refer to Response to Comment 215.	Visual Resources	Debbie McKinley	
217	40	039	Significance of impact to visual effects for No Action alternative must be clarified. Although an assessment of visual effects for the No Action Alternative does not appear to be provided, the City recommends that the continuance of the cohesive landscape and unobstructed vista and viewscape – despite the potential for deferred maintenance of vacant historic buildings within the ROI – would result in a beneficial impact on the ROI.	Comment noted. Treasury considers the continued presence of dilapidated buildings to be a potential less-than-significant adverse impact to the residences along Odell Road. No change made to the FEIS.	Visual Resources	Holly Simmons	City of Greenbelt
218	43	039	IX. Visual Resources The City offers the following comments/concerns about the impact analysis performed for visual resources.	Comment noted.	Visual Resources	Holly Simmons	City of Greenbelt
219	44	039	Analysis does not include any area in the City of Greenbelt. Because the northern edge of historic Greenbelt is located on a rise overlooking BARC, it is possible that the Proposed Action would have an impact on the City of Greenbelt (either the daytime or the nighttime view), specifically to those residences along Ridge Road.	Comment noted. Section 3.3.1.3 of the FEIS was revised to note that due to a rise in topography south of the Project Site, it is possible that the Project Site could be visible from portions of Ridge Road in the City of Greenbelt; however, there are few residences located along this portion of Ridge Road and their view of the Project Site is often obscured by vegetation. The tallest structures on Ridge Road, the Lakeside North apartments, would not be able to see the Project Site due to intervening vegetation and topography.	Visual Resources	Holly Simmons	City of Greenbelt
220	45	039	DEIS does not identify full extent of building envelope. The impact on viewshed is determined in part by the CPF main structure's proposed setback from roadways, property boundaries, etc., but the building shown in renderings is understood to be conceptual and therefore subject to change. The full extent of the building envelope for the facility should be disclosed in the DEIS.	Comment noted. While the conceptual renderings provided in the Visual Resources Technical Memorandum are preliminary and the concept is subject to change as the design progresses and becomes more refined, the renderings provide an appropriate basis for the environmental impact analysis. No change made to the FEIS.	Visual Resources	Holly Simmons	City of Greenbelt

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221	46	039	Visual impacts to Odell Road residences. The DEIS acknowledges that the Proposed Action will impact the residences along Odell Road. During construction (2021-2025), these residences may have unobstructed views of construction activities, and once construction activities have abated, “introduction of the proposed CPF would obstruct the historically and aesthetically valued vista/viewscape from the residences (i.e., the BARC Historic District viewscape), thereby permanently altering the character of the views from those homes.” As such, particular attention should be given to the owners and residents (owners and/or renters) of these homes. Treasury should proactively engage property owners and residents of the 34 homes along Odell Road in determining measures to be incorporated in the Proposed Action as EPMs. To mitigate the impacts of construction of adjacent residences along Odell Road, an additional EPM could be added: “Enhance landscape buffers within Forest Conservation Easements as the first step in the Sequence of Construction, to ensure maximum screening of construction activities from residential properties and roadways.”	Comment noted. Potential enhancement of existing conservation easements would be considered in consultation with MDNR during preparation of the FCP, as part of the permitting process. Table 2.2-1 in the FEIS notes that Treasury would install privacy fencing along Odell Road to minimize views of construction activities. Please also refer to Response to Comment 36. Treasury has engaged the public and surrounding local communities in the development of this Proposed Action and this EIS. The residents of Odell Road are included on Treasury's mailing list for this Proposed Action and this NEPA process. Please also refer to Response to Comment 14.	Visual Resources	Holly Simmons City of Greenbelt
222	47	039	Impacts to other residences not considered. The DEIS does not address possible impacts to additional residences that appear to be located within the ROI for visual impacts. The ROI appears to include residential dwellings at the eastern extend of Brewer Road, Cordwall Drive and Cordwall Court, and Cochran Road (Figure 3.9-2); however, these are bounded by a dashed line as opposed to a solid line. The meaning of the dashed line is not clarified within the DEIS, and impacts to these residences have not been accounted for in these analyses. The dashed line also appears at the ROI's western boundary along Edmonston Road. The meaning of the dashed line and reason for excluding these residences from analysis should be clarified. If further evaluation indicates these residences will be impacted, Treasury should proactively involve the owners and residents be included in determination of EPMs.	Comment noted. Section 3.3.1.3 of the FEIS was revised to explain that the dashed line in the ROI indicates filtered views. This section was further revised to restate that visual quality analyses typically focus on accessible, public viewsheds, but this analysis analyzes views from Odell Road residences as well due to their immediate proximity to the Project Site. Please also refer to Responses to Comments 36 and 14.	Visual Resources	Holly Simmons City of Greenbelt
223	76	039	XIV. Lighting The CPF will operate 24 hour per day, five days per week. The facility will also operate on the weekend, as needed. During the scoping period, the City of Greenbelt raised concerns regarding “The 24-hour operation of the BEP facility and associated lighting (i.e., impact on the environment/wildlife) [...]”. The DEIS states that noise and light generated at the facility would attenuate to ambient levels at approximately 800 feet. The DEIS states that Treasury’s Preferred Alternative would have potentially significant adverse impacts on nighttime lighting levels in and around the project site, and specifically for up to 34 residences along Odell Rd. The City is concerned that the CPF would also be visible at night from within City limits particularly along Ridge Road. During the public scoping period, a concern was raised that nighttime lighting may impact the Greenbelt City Observatory. These concerns are not addressed in the DEIS. It would be beneficial for Treasury to provide a photometric study of the site in the DEIS to address concerns regarding lighting. Compliance with the Prince George’s County Code of Ordinances regulations for parking lot lighting and associated off-site impacts should be incorporated into the Proposed Action as an EPM.	Comment noted. During the design of the Proposed Action and associated security systems, Treasury will review and consider the Prince George's County Code of Ordinances with respect to parking lot lighting. Treasury revised Section 3.3.2.2 of the FEIS to note that with implementation of EPMs (see Table 2.2-1), the Proposed Action would be unlikely to adversely impact the Greenbelt City Observatory due to its distance from the proposed CPF and intervening vegetation. Please also refer to Responses to Comments 214 and 219.	Visual Resources	Holly Simmons City of Greenbelt

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224	1	043	As a resident of <redacted>, I would like to make the following comments regarding this project. The report mentions the “proposed retainment” of the forest buffer”. It was the communities understanding that this forest buffer would be kept in place. Without this buffer, the noise and light impact on our neighborhood will be greatly increased. This buffer is also home to abundant wildlife.	Comment noted. The forest conservation easements are legally encumbered; Treasury would continue to retain them on-site in accordance with the legal obligations. Please also refer to Responses to Comments 36 and 221. No change made to the FEIS.	Visual Resources	Erica McCauley	
225	3	043	Light: Even considering the efforts mentioned in the report to lessen the light impact on the area, it will still have a very negative impact. Light pollution is an ever increasing problem for both people and wildlife. It is still my hope that BEP and BARC will reconsider using this location for the new facility.	Comment noted.	Visual Resources	Erica McCauley	
226	9	048	Visual Resources. The Draft EIS identifies potentially significant adverse impacts to the 34 homes along Odell Road based on the views of the 50-foot high building and night time lighting. The Draft EIS states the proposed facility “would be a permanent feature of the visual landscape” for the residents abutting the BARC property. It is inappropriate and potentially discriminatory to dismiss the impact of the predominantly minority population abutting the BARC property.	Comment noted. Please refer to Responses to Comments 36, 221, and 14.	Visual Resources	Thomas E. Dernoga c/o Michelle Garcia	Prince George's County Council
Section 3.4 - Air Quality							
227	51	016	(Figure 3.4-2) The use of different ROIs for the air quality analysis is unclear and confusing. It was stated that the ROI for the air quality analysis is Prince George’s County and the NCR, yet the ROI identified previously is as shown in this figure. Additionally, the evaluation of impacts on sensitive receptors is based on the ROI shown in the figure. For clarity and completeness, the basis for utilizing two separate ROIs should be explained and justified.	Comment noted. Section 3.4.1.1 was revised to clarify use of two Air Quality ROIs: the larger ROI (Prince George's County and the NCR) is relevant for regulatory compliance (e.g., NAAQS), while the smaller ROI (the area within 1,500 feet of the Project Site) is where sensitive receptors may experience localized air quality impacts (e.g., from fugitive dust emissions during construction).	Air Quality	Debbie McKinley	
228	52	016	(Lines 1438-1440) Disagree with the stated determination and reasoning. The buildings would not remain in their current condition over time but would continue to deteriorate further. Any hazardous (e.g., asbestos, lead from lead-based paint, mercury, PCBs, pesticides, herbicides, laboratory chemicals and various petroleum-based products) or other materials (e.g., fugitive dust) contained in the buildings may be released as buildings collapse and materials degrade. This degradation would, therefore, generate new air pollutant emissions. For completeness, the DEIS should address the potential for toxic and hazardous air pollutant (HAP) and fugitive dust emissions to occur in the future due to building deterioration.	Comment noted. While the buildings would continue to deteriorate, Treasury (and the USDA) does not anticipate them to collapse. Potential HTMW impacts are discussed in Section 3.13.2.1 . While existing contaminants could potentially be released into the environment, this would not result in a measurable or appreciable air quality impact. No change made to the FEIS.	Air Quality	Debbie McKinley	
229	53	016	(Lines 1454, 1455) This statement appears misleading. While the Proposed Action would have a beneficial impact on air quality within Prince George’s County and the NCR, the Proposed Action would have a negative impact on air quality in the ROI shown in Figure 3.4-2.	Comment noted. This paragraph states both that VOC reductions would have a beneficial impact at the AQCR level (i.e., primary ROI), and that, within 1,500 feet of the proposed CPF (i.e., local ROI), criteria pollutant emissions (including VOCs) would increase and result in less-than-significant adverse impacts. No change made to the FEIS.	Air Quality	Debbie McKinley	

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230	4	025	<p>Shortcomings in the Air Quality Discussion</p> <p>The DEIS does not include in the Air Quality discussion the potential adverse impact on air quality of the vehicles that will drive to and from the proposed facility during construction and later during operation, although it acknowledges that vehicular traffic will significantly impact the region of influence. The DEIS includes further analysis of the potential impact of the construction and operation of the proposed facility on air quality in an attached technical memorandum. The technical memorandum describes the existing air quality in the proposed facility's region of influence as well as measures to reduce potential adverse air quality effects from such construction and operation. Another technical memorandum describes traffic and transportation in the region of influence, potential traffic and transportation impacts that could result from the proposed facility, and measures to reduce potential adverse traffic and transportation effects. Treasury assumes there would be 7,278 dump truck trips over the entirety of the construction period. Although these trips would be distributed throughout the construction phase, they would primarily occur during the first 2 years of construction, when the dump trucks would be disposing of demolition materials and delivering construction materials. The technical memorandum states that while construction traffic would likely contribute slightly to traffic volume and congestion on local roadways, it would be temporary, minor compared to existing daily traffic, and would not lead to a lasting or permanent degradation of traffic operations. However, there is no discussion of how 7,278 dump truck trips would contribute to the degradation of local air quality during construction.</p>	<p>Comment noted. The dump trucks that would be used during construction are considered and treated as construction equipment within the air quality analysis. Table 5 of the Air Quality Technical Memorandum lists the air quality impact analysis assumptions, which include the dump trucks and construction workers' POVs during construction and delivery trucks and commuter POVs during operation. As such, projected emissions during construction and operation, as determined in the General Conformity Analysis calculations included in Appendix A of the Air Quality Technical Memorandum, <u>do</u> include the estimated emissions from these additional truck and car trips. No change made to the FEIS.</p>	Air Quality	Kiki Theodoropoulos	
231	6	025	<p>While the DEIS discusses the adverse impact on roadways due to an increase in traffic from commuters and trucks, including long queues and failures at most of the 15 intersections studied in the region of influence, there is no discussion of how the increase in traffic may affect air quality from additional car and truck exhaust. Given that Treasury plans the temporary closure of some roadways (e.g., Powder Mill Rd.), where presumably traffic would idle at least some of the time, further increasing the production of car and truck exhaust, some analysis linking the effects of traffic and transportation to potential adverse impacts seems warranted.</p>	<p>Comment noted. Please refer to Response to Comment 230. If vehicles are required to idle while waiting to pass construction activities on Powder Mill Road while these road improvements are being implemented, exhaust emission increases would be negligible and would not be anticipated to be noticeable to the BARC facilities located along this portion of Powder Mill Road. No change made to the FEIS.</p>	Air Quality	Kiki Theodoropoulos	
232	3	040	<p>Air Quality is a major concern. The report says that downtown DC air would improve but that is something a first grader might say. The failure to address the impact of increased emissions in an area well documented by multiple Federal agencies as suffering from high VOCs underscores the shoddy and superficial nature of your report.</p>	<p>Comment noted. Please refer to Response to Comment 229.</p>	Air Quality	Melissa Daston	
233	5	046	<p>5. The exhaust emissions from the diesel type trucks and increased employee vehicles will also have a major impact on the clean air in this and surrounding areas.</p>	<p>Comment noted. Please refer to Response to Comment 230.</p>	Air Quality	Albert Klein	

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234	11	048	Air Quality. The Draft EIS analysis is based on projections and assumptions subject to change making the data in the report specious. The projected annual pollutant emissions during operation (Table 3.4-3) states the Currency Production Facility (CPF) will have a beneficial impact based on a reduction of VOC emissions in downtown Washington, DC. This comparison is irrelevant. The issue is what is the impact in the BARC area? Based on the data provided, the emissions would be higher than existing in the Beltsville-Laurel area today. In a different section, the Draft EIS states that emissions from operations could disproportionately affect surrounding communities of concern with the only mitigation being some traffic mitigation. The unknown impact of the air quality to the residents living along Odell Road and in Vansville is of great concern to these residents, many of whom are minorities and elderly with pre-existing medical conditions that would be negatively impacted by any degradation of the air quality. The negative air quality impact raises environmental justice concerns.	Comment noted. Please refer to Response to Comment 229. Treasury would comply with all applicable federal and state regulations and permits. The EIS accurately identifies potential EJ effects associated with air quality in Section 3.13.2.2 of the FEIS and Section 1.3.3.2 of the Socioeconomics and Environmental Justice Technical Memorandum . No change made to the FEIS.	Air Quality	Thomas E. Dernoga c/o Michelle Garcia Prince George's County Council
235	12	048	The analysis needs to recognize the documented poor local air quality. The Metropolitan Washington Council of Governments (MWCOCG), through the Metropolitan Washington Air Quality Committee (MWAQC), is responsible for air quality monitoring and compliance in the metropolitan region. MWAQC is the entity certified by the Mayor of the District of Columbia and the Governors of Maryland and Virginia to prepare an air quality plan for the DC-MD-VA Metropolitan Statistical Area under Section 174 of the federal Clean Air Act Amendments of 1990. I am a current member of MWAQC and have previously served as Commission Chair. In executing its responsibilities, MWAQC coordinates air quality planning activities among MWCOCG, other external committees, and the Transportation Planning Board; reviews policies; resolves policy differences; and adopts an air quality plan for transmittal to the District of Columbia, Maryland, and Virginia. The State air agencies maintain 14 air quality monitors in the region, including on at the Howard University property in Beltsville adjacent to the BARC property. MWAQC reports have long documented that the Beltsville monitor records some of the highest pollution levels in the region. Attached is the 2019 Ozone Season Summary from MWAQC (July 25, 2019) (https://www.mwcog.org/events/2019/7/24/metropolitan-washington-air-quality-committee/). See Slide 3 for the Beltsville ozone exceedance levels.	This air quality monitoring program is referenced Section 3.4.1.3 of the FEIS. It is further detailed in Section 1.2.3 of the Air Quality Technical Memorandum , including air monitoring measurements from the 'Howard University-Beltsville' and 'Beltsville-CASTNET' stations that show elevated ozone levels (see Table 3). Section 3.4.1.3 of the FEIS was revised to state that the ozone measurements from these stations exceed NAAQS.	Air Quality	Thomas E. Dernoga c/o Michelle Garcia Prince George's County Council
236	5	052	In addition, fugitive dust emissions also pose as a potential hazardous risk to children. Lines 1562-64 state that the Vansville Recreation Center and Vansville Elementary School are approximately 1,500 feet from the project site boundary, and the Touch of Eden Daycare as approximately 1,300 feet from the site boundary. The BARC 27 location experiences wind predominantly from the south/southwest region during the spring and summer which might potentiate the risks of dust emissions reaching these schools. Particulate matter within PM 2.5 or smaller is considered dangerous as it can be absorbed by lung tissue. Due to this hazard, it is suggested that the BEP should add additional dust particle sensors near the schools during the construction phase so that children's and staff's respiratory health are not at risk.	Comment noted. Please refer to Table 2.2-1 regarding the EPMS/RCMs that Treasury would implement to minimize fugitive dust impacts. No change made to the FEIS.	Air Quality	Kobe Ramirez c/o Julian Grauer Environmental Review, Inc.

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Section 3.5 - Noise							
237	54	016	(Lines 1579, 1580) This statement appears misleading. For those BARC buildings south-southwest of the project site, the minimal vegetation present and topography would not appear to help to block construction noise during a normal daytime construction shift. Thus, it is unclear how the estimated maximum sound levels experienced by receptors at and within these BARC buildings can be assumed to be below 75 dBA. A reasoned basis for the assertion as it applies to the nearby BARC buildings should be presented.	Comment noted. In the DEIS, this paragraph stated that four BARC facilities could experience noise levels above 72 dBA while the proposed entrance road is constructed; the text was revised to state that several BARC facilities could experience noise levels above 72 dBA during construction of the Proposed Action and particularly during construction of the proposed entrance road. Table 2 of the Noise Technical Memorandum was revised to include the OSHA noise regulations; the maximum noise exposure level for 8 hours per day is 90 dB. BARC facilities would be unlikely to experience noise levels this high; however, Table 2.2-1 of the FEIS was revised to include an EPM for Treasury to coordinate with BARC regarding anticipated noise levels for BARC facilities throughout construction.	Noise	Debbie McKinley	
238	2	043	Sound: The report mentions calculations regarding how far sound from the facility will carry and impact the community. As a resident of 20 years, I would like to emphasize that average dB ratings do not apply in a normal way to this area. Sound travels extremely far and loud due to the lay of the land. We are in somewhat of an echo chamber here. Noise from the facility will likely be much more intrusive than the calculations suggest. As an example, the train noise from the tracks along route 1 can be heard very loudly in the neighborhood, especially on the second floor of our homes. If we can hear that, I assure you that overnight truck deliveries and HVAC systems will also be a constant problem. We do appreciate the discussion of removing the rumble strips. It is greatly appreciated, but overnight truck deliveries will have a larger than negligible impact on the quality of life.	Comment noted. Section 3.5 was revised to include additional information about the proposed overnight shipment process to support the determination of "less-than-significant" impacts. Tractor trailer deliveries (i.e., for manufacturing materials) to the CPF would occur during the day, to align with production shifts. Currency shipments (via armored trucks) would occur at night, but the loading of armored trucks would occur within the building. In addition, the HVAC system would be enclosed.	Noise	Erica McCauley	
239	15	044	Noise Section 3.5.1.3 indicates that existing sources of noise are typically associated with residential and agricultural uses, including vehicle traffic, farm equipment, and landscaping equipment. For community residents, increased noise from construction and ongoing increased traffic generally creates annoyance and an overall nuisance affecting quality of life. The increased noise can interfere with conversation or listening to television, impact learning, and disrupt sleep. As noted, differing sound exposure levels vary in terms of the level at which disturbance to individuals may occur. BARC facilities are generally not occupied during nighttime hours, so nighttime noise may be particularly intrusive. Therefore, we recommend further clarifying the measures that will be taken to reduce noise from construction and operation of the CPF and committing to specific measures where possible, particularly during the reconstruction of Poultry Road.	Comment noted. Please refer to Table 2.2-1 regarding the EPMs/RCMs that Treasury would implement to minimize noise impacts. No change made to the FEIS.	Noise	Carrie Traver	USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment

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Comment #	Comment # by Reviewer	Commenter ID#	Comment	Response to Comment Blue Shading: Change made to the FEIS. Green Shading: No change made to the FEIS.	Topic(s)	Name	Organization (if applicable)
240	16	044	During operation, the DEIS states that equipment would be designed to operate at or below noise thresholds in accordance with the Prince George’s County ordinance. We recommend that the FEIS clarify the likely daytime and nighttime noise levels from the facility, including from support equipment such as emergency generators and heating, ventilation, and air conditioning units. We also recommend evaluating reducing or eliminating heavy truck shipments during late night and early morning when the noise may be disruptive to sleep.	Comment noted. Section Treasury's permanent equipment, including support equipment, would be enclosed to minimize exterior noise. Section 3.5.2.2 of the FEIS was revised to note that noise levels experienced by noise-sensitive receptors would be in accordance with the Prince George’s County Noise Ordinance for residential areas (i.e., 65 dBA or less during the day and 55 dBA or less at night). Please also refer to Response to Comment 238.	Noise	Carrie Traver	USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
Section 3.6 - Topography and Soils							
241	5	010	The site is in a gently rolling topography that will be significantly altered to create a flat development area yet the EIS states that there would be no impact to topography. There is no grading plan shown so there is no basis for dismissing this impact topic.	Comment noted. Section 3.6 of the FEIS was revised to include a brief impact analysis for topography. While a grading plan would not be developed until the final design phase, Treasury does not anticipate excavating beyond 25 feet bgs.	Topography and Soils	Carolyn Mitchell	
242	43	016	(Table 3.1-2, Geology, Topography, and Soils, Geology) No justification is provided for the assertion that no impacts to geology are anticipated because no excavation is proposed beyond 25 feet below ground surface (bgs). As defined in the Technical Memorandum, Lines 7 and 8, geology refers to the structure and configuration of both surface and subsurface features. Per both the Final Phase II Investigation Report, 104-Acre Parcel of Land Surrounding Poultry Road and Final Environmental Condition of Property Report 104-Acre Parcel of Land Surrounding Poultry Road, the geology at BARC consists of Lower Cretaceous sediments of the Potomac Group, which consists of the Patuxent, the Arundel, and the Patapsco Formations. The Patuxent and Patapsco Formations are composed primarily of sand and gravel. The Property lies on the Patuxent Formation. Soil borings and temporary groundwater monitoring wells were installed on the Parcel, yet both reports identified above as accessed through USACE BEP website did not contain any appendices and, thus, no geological profiles or soil or well borings logs. Therefore, no documentation is provided to support the assertion that no impacts to geology are anticipated. Information should be included in the DEIS to support this statement. Merely stating there are no impacts does not make it a reality.	Comment noted. Section 1.1 of the Topography and Soils Technical Memorandum and Table 3.1-2 in the FEIS were revised to include a clearer explanation of why geology was dismissed from detailed analysis. Treasury can provide the complete ECOP and Phase II Investigation, including appendices, upon request.	Topography and Soils	Debbie McKinley	
243	55	016	(Lines 1646, 1647) Disagree that the No Action Alternative would have no impact on soil resources. As the buildings deteriorate, there would appear to be the potential for used oils, PCBs, asbestos, lead, mercury, pesticides, herbicides, and laboratory chemicals to be released into the environment and to result in soil contamination (see Final Environmental Condition of Property Report 104-Acre Parcel of Land Surrounding Poultry Road). The presence of these chemicals in soil may affect the ability to reuse these soils.	Comment noted. Potential HTMW impacts are discussed in Section 3.13.2.1 of the FEIS. Section 3.6.2.1 in the FEIS was revised to reference Section 3.13.2.1 regarding potential contaminant release to soil.	Topography and Soils	Debbie McKinley	

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244	56	016	(Lines 1659-1660) BARC’s municipal separate storm sewer system (MS4) permit contains a goal of achieving a 20-percent reduction of impervious surface area by 2025 (see Demolition of 22 Buildings at the Henry A. Wallace Beltsville Agricultural Research Center, ARS 2020). It is not clear how increasing the impervious surface cover on the Project Site by 29.4 acres is compatible with this goal. Please clarify the compatibility of increasing the impervious surface cover with the stated goal.	Comment noted. As ownership of the proposed Project Site would be transferred from the USDA to Treasury, this parcel would be removed from the USDA's BARC property and not subject to the USDA's impervious surface reduction initiative. No change made to the FEIS.	Topography and Soils	Debbie McKinley	
245	57	016	(Line 1684) It would appear that maintenance and/or revegetation measures may need to be implemented in order to ensure that no exposed soil would occur on the Project Site. The need for such an ECM should be addressed for completeness.	Comment noted. Proposed EPMs (see Table 2.2-1 in the FEIS) to address impacts to soil include revegetation of disturbed areas. No change made to the FEIS.	Topography and Soils	Debbie McKinley	
246	6	024	Borrow areas used to provide clean earth back fill material may require a surface mine permit. Disposal of excess cut material at a surface mine may require site approval. Contact the Mining Program at (410) 537-3557 for further details.	Comment noted. Treasury would determine the need for borrow areas or cut material disposal areas during the design phase of the Proposed Action; such activities would be conducted in compliance with all federal and state regulations. No change made to the FEIS.	Topography and Soils	c/o Sylvia Mosser	MDE
247	8	030	II. Stormwater Runoff If possible, the sections pertaining to stormwater runoff are even less informative than the sections on protected species. Although the report is littered with references to “best management practices,” obtaining permits (or getting exemptions from them), as well as the optimistic goal of obtaining “a silver LEED rating,” there is almost no explanation as to how the conclusion of “no impact to geography, topography, or soils” and “no impact to water resources” has been reached. In order to be transparent as to how the tons of stormwater that will have been polluted by this construction will be managed, this report needs to include the following: specific information on the filtration system to be used, data on sedimentation, and data on accumulation rates.	Comment noted. Treasury would comply with NPDES requirements and conduct construction in accordance with an ESCP to prevent stormwater impacts (see Table 2.2-1 in the FEIS). No change made to the FEIS.	Topography and Soils Water Resources	Vickie Fang, Butch Norden, Beth Norden	
248	10	030	Issues not Addressed I. Soil runoff from staging areas. The report states that staging areas will be located at least 100 feet from surface water (p. 2-7). However, it does not state that the large piles of soil at those areas will be secured in anyway. Given that we now live in a world of increasing rainfall and increasingly intense storms (https://www.gfdl.noaa.gov/global-warming-and-hurricanes/), it is incumbent upon the agency to secure large mounds of soil and anything else that could be harmful to the surface water in the event of a major storm. This report lacks an explanation of how soil runoff from staging areas will be secured in the event of a major storm.	Comment noted. Soil stockpiles would be managed in accordance with the ESCP. No change made to the FEIS.	Topography and Soils Water Resources	Vickie Fang, Butch Norden, Beth Norden	

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Section 3.7 - Water Resources - General							
249	59	016	(Lines 1839-1842) BARC’s MS4 permit contains a goal of achieving a 20-percent reduction of impervious surface area by 2025 (see Demolition of 22 Buildings at the Henry A. Wallace Beltsville Agricultural Research Center, ARS 2020). It is not clear how increasing the impervious surface cover on the Project Site by 29.4 acres is compatible with this goal. Please clarify the compatibility of increasing the impervious surface cover with the stated goal.	Comment noted. See Response to Comment 244.	Water Resources	Debbie McKinley	
250	1	021	A review of floodplain maps derived from the County’s watershed studies and the FEMA [Federal Emergency Management Agency] flood insurance study reveals no delineated floodplain on the subject site. However, this review also revealed defined drainage courses for which a floodplain may exist but has yet to be determined. It’s recommended that the site developer submit the project development plan to the County’s Department of Permitting, Inspection and Enforcement (DPIE) for review and guidance on permit requirements.	Comment noted. Treasury anticipates attenuating the 100-year storm event through its on-site stormwater management design such that the post-development flood state does not exceed the pre-development flood state. Upon completion of the stormwater design strategy and pre- and post-development hydrological analyses, Treasury will consult with Prince George's County regarding the need for additional analysis. No change made to the FEIS.	Water Resources	c/o Sylvia Mosser	Prince George's County
251	7	024	MDE's Water and Science Administration provided water quality checklists and review forms in the MD State Clearinghouse Recommendation Letter:-Construction Stormwater Antidegradation Checklist-Antidegradation Review Finding-Antidegradation Review Report Form: Alternatives Analysis - Minimization Alternatives-Antidegradation Review Report Form: Alternatives Analysis - No Discharge AlternativeADDITIONAL COMMENTSStormwaterPlanners should consider all Maryland Stormwater Management Controls andduring Site Design the planner should consider all Environmental Site Design tothe Maximum Extent Practicable and “Green Building” Alternatives. Designs thatreduce impervious surface and BMPs that increase runoff infiltration are highlyencouraged.Further Information: http://www.mde.state.md.us/programs/water/StormwaterManagementProgram/Pages/swm2007.aspx Environmental Site Design (Chapter 5): http://www.mde.state.md.us/programs/water/StormwaterManagementProgram/Documents/www.mde.state.md.us/assets/document/Design%20Manual%20Chapter%205%2003%2024%202009.pdf Redevelopment Regulations: http://www.dsd.state.md.us/comar/comarhtml/26/26.17.02.05.htm	Comment noted. Treasury acknowledges receipt of these forms, and would complete and submit them as required during the permitting process. Treasury revised Table 2.2-1 of the FEIS to include EPMs/RCMs to comply with Maryland Tier II Antidegradation Review policies, and to consider all Maryland Stormwater Management Controls, Environmental Site Design, and "Green Building" Alternatives. Please also refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS.	Water Resources	Angel Valdez	MDE

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252	4	026	<p>Wetlands</p> <p>The DEIS asserts that wetlands impacts are “less than significant” because it would comply with certain permitting requirements. However, the DEIS also states that the Treasury would seek an exemption from mitigation requirements under Maryland’s nontidal wetlands protection program because it would impact only 0.94 acres of the approximately 3 acres of on site wetlands. But the Federal Environmental Elements of NCPC’s Comprehensive Plan for the National Capital Region strongly suggests that federal agencies hold themselves to a higher standard. Specifically, with regard to wetlands, Federal Elements FE.E.1 states that the federal government should:</p> <p>Protect the physical and ecological functions of wetlands and riparian areas with priority in the following order:</p> <ol style="list-style-type: none"> 1. Avoid development of areas that contain wetlands, including isolated wetlands, or on sites that will impact the quality and health of nearby wetlands. 2. Minimize the impacts to wetlands by reducing the area of disturbances. If construction in a wetland is necessary, utilize the highest standard in project development requirements to minimize adverse impacts. 3. Replace wetlands that are lost or degraded as a result of site development. <p>How can it be that adverse impacts on one-third of a parcel’s wetlands that arise from a federal agency’s willful failure to meet these higher standards can still be deemed “less than significant” adverse impacts?</p>	<p>Table 1 in the Water Resources Technical Memorandum was revised to include the NCPC Comprehensive Plan, Federal Environment Element; Treasury is consulting with the NCPC for this Proposed Action. Treasury prepared a Finding of No Practicable Alternative (FONPA) to Construction in Wetlands (see Appendix A of the Water Resources Technical Memorandum) and would minimize disturbances to wetlands through sensitive project design to the extent practicable. Section 3.7.3 of the EIS was revised to include a recommended mitigation measure to replace wetland losses using a 1:1 ratio if not already required through the federal and state wetland permitting processes.</p>	Water Resources	Clara Kuehn	
253	9	030	<p>III. Replacement of Wetland</p> <p>It appears from the report that the existing plan is to replace lost wetland on a one to one basis; however, in order to balance the pollution caused by the construction, the site will require additional wetland. The simple listing of acreage bypasses the key point that the land must continue to function as a wetland in the same way it did before. For this report to be transparent and complete, we need an analysis of how the site currently serves the larger environment and what must be done for it to continue to do so once a large industrial plant is constructed there. This information should identify who is doing the analysis and what data the analysis generated.</p>	<p>Comment noted. In compliance with Section 438 of the EISA, Treasury would ensure that pre-development hydrology is maintained on-site to the maximum extent technically feasible. Please also refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS.</p>	Water Resources	Vickie Fang, Butch Norden, Beth Norden	
254	12	030	<p>III. Anadromous Stream Analysis</p> <p>Herrings have been sighted in waters on the site, making the creeks anadromous streams. This report lacks any analysis of how these anadromous streams will be protected.</p>	<p>Comment noted. Please refer to Section 3.7 of the FEIS for Treasury's water resources impact analysis, Table 2.2-1 for proposed EPMs/RCMs, and Section 3.7.3 for recommended water resources mitigation measures. No change made to the FEIS.</p>	Water Resources	Vickie Fang, Butch Norden, Beth Norden	

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255	1	037	The purpose of this letter is to convey the Maryland Department of the Environment’s, Wetlands and Waterways Program’s (Program), comments on the Draft Environmental Impact Statement (DEIS) for the proposed Bureau of Engraving and Printing (BEP) Project. As stated in the DEIS, the purpose of the project is to construct and operate a new currency producing facility on federally owned, available land within the National Capital Region (NCR) that is readily accessible to interstate roadways and commercial airports for transportation of US currency. The project, as described in the DEIS, will impact nontidal wetlands, the 25-foot nontidal wetland buffer, and waterways, including the 100-year nontidal floodplain and will require a Nontidal Wetlands and Waterways Permit. The following are the Program’s comments on the DEIS and are divided into four categories which track with the main elements of permit review and processing outlined in the Code of Maryland Regulations. Please note that as additional information is provided, the Program will likely have further comments relating to potential impacts to regulated resources.	Comment noted.	Water Resources	Amanda Sigillito	MDE
256	6	037	Avoidance and Minimization of Impacts Chapter 3.0 Affected Environment and Environmental Consequences, Section 3.7.1.2: Six palustrine nontidal wetlands have been identified in the study area. Proposed unavoidable impacts to these resources will require BEP to submit a Joint Federal/State Application for the Alteration of Any Floodplain, Waterway, Tidal or Nontidal Wetland in Maryland (Application) to the Program. Prior to submitting the Application, we strongly encourage BEP to request a pre-application meeting with the Program. At the pre-application meeting we can discuss avoidance and minimization of impacts to nontidal wetlands, the 25-foot nontidal wetland buffer and waterways, including the 100-year nontidal floodplain. A pre-application meeting may be requested online at: https://mde.maryland.gov/programs/Water/WetlandsandWaterways/Pages/PreApplicationIntroduction.aspx	Comment noted.	Water Resources	Amanda Sigillito	MDE
257	7	037	Additionally, BEP should consider presenting the project at a Joint Evaluation (JE) meeting. In addition to representatives of the Maryland Department of the Environment, representatives from other State agencies, (e.g., Maryland Department of Natural Resources, Maryland Historical Trust) and federal agencies (e.g. U.S. Army Corps of Engineers, Baltimore District, Regulatory Branch, U.S. Environmental Protection Agency, U.S. Fish and Wildlife Service) attend JE meetings and provide comments on the projects that are presented. Please visit the Program’s website for more information about how to request being included on the JE meeting schedule: https://mde.maryland.gov/programs/Water/WetlandsandWaterways/Pages/Joint_Evaluation.aspx Please note that information on all impact avoidance and minimization efforts as well as the reasons for the impacts (e.g., lot fill, building/road construction, etc.) will need to be thoroughly discussed in the Application. All impacts to regulated resources, both permanent and temporary, will need to be quantified on a table(s) and clearly shown on impact plates. Please see comment no. 7 below regarding mitigation for permanent nontidal wetland impacts.	Comment noted.	Water Resources	Amanda Sigillito	MDE

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258	8	037	Chapter 3.0 Affected Environment and Environmental Consequences, Section 3.7.2.2: The 117 linear feet of stream to be diverted/relocated should be done in a way that results in the natural stream system with a stable dimension, pattern and profile. Additionally, further details are required regarding the statement “fill and not replace 109 linear feet of the on-site second intermittent stream”.	Comment noted. The first paragraph of Section 3.7.2.2 of the FEIS, as well as the associated EPM, were revised to note that the diversion of the 117-foot segment of stream would be conducted using a "natural stream system." The second paragraph of this section was revised to note that the 109-foot segment that would not be replaced currently drains an existing wetland that would also be filled. The design for this portion of the LOD would include a new drainage pattern that complies with applicable regulations and design requirements.	Water Resources	Amanda Sigillito MDE
259	9	037	Mitigation Chapter 3.0 Affected Environment and Environmental Consequences, Section 3.7.1.2: Mitigation will be required for all permanent impacts to nontidal wetlands. Please note that in the past for similar projects, the Program has required mitigation for permanent impacts to isolated nontidal wetlands when mitigation is required for permanent impacts to connected nontidal wetlands. Therefore, when developing a mitigation proposal, please include all permanent impacts to nontidal wetlands. Please contact Ms. Kelly Neff of the Nontidal Wetlands Division’s Mitigation and Technical Assistance Section to discuss nontidal wetland mitigation for the project. Ms. Neff can be reached at 410-537- 4018, 443-463-9722 or at kelly.neff@maryland.gov .	Comment noted.	Water Resources	Amanda Sigillito MDE
260	10	037	Water Quality Certification and Coastal Zone Consistency Please be aware that assuming the U.S. Army Corps of Engineers, Baltimore District, Regulatory Branch will review the project as an Individual Permit, the Program will need to review the project for an individual Water Quality Certification (WQC) and Coastal Zone Management Act consistency determination (CZMA). On September 11, 2020, EPA updated requirements for Section 401 of the Clean Water Act, which include new requirements for project proponents. For more information on WQC or CZMA in Maryland please consult https://mde.maryland.gov/programs/Water/WetlandsandWaterways/PermitsandApplications/Pages/index.aspx	Comment noted.	Water Resources	Amanda Sigillito MDE
261	55	039	Proposed impacts to onsite surface waters draining to Beaver Dam Creek. The Proposed Action would divert approximately 117 linear feet of intermittent stream; fill and not replace approximately 109 linear feet of a second on-site intermittent stream; and impact a portion of Wetland 4 to allow for installation of security fencing. Both of these streams drain to Beaver Dam Creek. Wetland 4 is the “largest and highest quality of [the wetlands onsite, and] is largely groundwater-fed and derived from an intermittent channel” and feeds to the intermittent stream to be diverted. The City is concerned that impacts to these streams may have down-stream effects on Beaver Dam Creek which the DEIS fails to account for.	Comment noted. The third paragraph of Section 3.7.2.2 of the FEIS was revised to note that construction-related ground disturbance, including modification or removal of existing stream channels, could increase on- and off-site soil erosion and sedimentation that could impact surface waters in the ROI (e.g., Beaverdam Creek). These potential impacts would be minimized through compliance with applicable regulations and permits, including NPDES and Maryland Tier II Antidegradation Review policies.	Water Resources	Holly Simmons City of Greenbelt

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262	60	039	Treasury plans to defer determination of stormwater requirements. It is unclear whether Treasury has performed site-specific analysis of possible effects of increased stormwater. The DEIS states that Treasury plans to determine stormwater requirements through the proposed CPF design process. The City believes that determinations regarding stormwater cannot be deferred. To have a comprehensive understanding of the Project’s potential effects, stormwater requirements and impacts must be addressed with the DEIS, including but not limited to impacts to hydrology in terms of volume, quality, and temperature, and a complete break-out of current and anticipated nutrient and sediment loading must be provided. All calculations should be provided for the site as a whole, as well as by drainage area and watershed.	Comment noted. Hydrological analyses and determination of stormwater requirements would be conducted during the design phase. No change made to the FEIS.	Water Resources	Holly Simmons	City of Greenbelt
263	63	039	XII. Draft Finding of No Practicable Alternative (FONPA) and Wetlands Under Executive Order (EO) 11990, Protection of Wetlands, Treasury “shall avoid undertaking or providing assistance for new construction located in wetlands unless the head of the agency finds: (1) that there is no practicable alternative to such construction; and (2) that the proposed action includes all practicable measures to minimize harm to wetlands which may result from such use.” Under EO 11990, Treasury must find that there is no practicable alternative to development within wetlands and take all practicable measures to minimize harm to or within wetlands. The Draft FONPA includes such a finding and outlines the steps Treasury will take to avoid or minimize impact to wetlands.	Comment noted.	Water Resources FONPA	Holly Simmons	City of Greenbelt
264	64	039	The City offers the following comments pertaining to the FONPA: Treasury’s FONPA for the Proposed Action does not appear warranted, given the information in the “Alternatives Considered” portion of the City analysis, including the apparent existence of reasonable alternative sites and the extensive opportunities for redesign at Treasury’s Preferred Alternative site.	Comment noted. Please refer to the Master Response provided under “Alternatives Screening Process” in Section 9.0 of the FEIS. No change made to the FONPA.	Water Resources FONPA	Holly Simmons	City of Greenbelt
265	65	039	The mitigation outlined in the FONPA does not appear to include “all practicable measures to minimize harm”, as required by EO 11990. The DEIS and the FONPA state Treasury’s intent to apply for an exemption from mitigation requirements for wetlands under Maryland’s Nontidal Wetlands Protection Program. The FONPA states that “any mitigation will be implemented as directed”; however, it is anticipated that MDE may not require mitigation, as the impact is less than 1 acre. While this may meet MDE’s regulatory requirements, the implementation of mitigation only as directed – and not as a proactive harm-reduction measure – does not appear to meet the standards of EO 11990. Mitigation at a minimum 1:1 rate for emergent wetlands must be provided. The use of wetland restoration should always be the first compensatory mitigation option considered.	Comment noted. Section 3.7.3 of the EIS was revised to include a recommended mitigation measure to replace wetland losses using a 1:1 ratio if not already required through the federal and state wetland permitting processes. Please also refer to Response to Comment 252.	Water Resources FONPA	Holly Simmons	City of Greenbelt

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266	66	039	The head of Treasury must make relevant findings. The City notes that EO 11990 appears to require the head of the federal agency to make relevant finding; however, the FONPA includes a signature line for "Charles C. Davis, P.E. / Program Manager / Bureau of Engraving and Printing [emphasis added]".	The Final FONPA has been signed by Treasury's Assistant Secretary for Management.	Water Resources	Holly Simmons	City of Greenbelt
267	67	039	Additional comments pertaining to wetlands generally include: Inadequate significance thresholds identified in the DEIS. The DEIS considers a significant adverse impact to wetlands to be one that would "Fill or substantially alter more than 1 percent (i.e., 8.15 acres) of the total wetland acreage at BARC." The DEIS provides no clear justification or rationale for this significance threshold. The significance threshold must be reconsidered in terms of the stringent guidance of EO 11990, which instructs federal agencies undertaking new construction to avoid any impact to wetlands (regardless of size) unless no alternative exists. The FONPA recognizes that development activities impact wetlands "via the loss or degradation of their natural functional benefits such as water storage, infiltration, and filtration. These impacts extend to the intrinsic value of these resources or the benefits associated with their use, such as wildlife habitat, recreation, and aesthetic enjoyment. Wetland functions and values are also susceptible to changes in the volume, rate, and quality of stormwater discharge, particularly as influenced by the amount of impervious surface within a watershed." The DEIS does not appear to account for the significance of these impacts. The assessment that potential wetlands impacts from construction of the Proposed Action would be considered less-than-significant impacts must also be revised to significant adverse impacts.	Comment noted. Wetlands are relatively abundant at BARC, and include at least 815 acres. Given this context, Treasury's potential impacts to less than 1 acre out of 815 acres would represent a less-than-significant impact; these impacts would be further reduced through compliance with federal and state wetland regulations and mitigation requirements. Please also refer to Responses to Comments 252 and 265. No change made to the FEIS.	Water Resources	Holly Simmons	City of Greenbelt
268	68	039	Information regarding wetland impacts are inconsistent. The FONPA states, "The Proposed Action would permanently affect approximately 0.94 acres of wetlands and up to 2 additional acres of wetlands may be subject to temporary, construction-related effects." The DEIS does not mention an additional two acres of temporary disturbance to wetlands. The extent and duration of impact to wetlands must be clarified in the DEIS.	Comment noted. The FONPA (see Appendix A of the Water Resources Technical Memorandum) was revised for consistency with the FEIS. The Proposed Action would have no temporary impacts on wetlands.	Water Resources FONPA	Holly Simmons	City of Greenbelt
269	69	039	Information pertaining to compliance with Section 404 of the Clean Water Act should be provided. The DEIS states that the Project will comply with Section 404 of the Clean Water Act (CWA). The DEIS should clarify how the Project will comply with the CWA, which permits are required for the Project, whether additional public engagement is required, and any mitigation that Treasury will provide. The CWA permit must address all discharges associated with this project. All operation discharges resulting from this Project must be covered under one permit. If this project will result in the implementation of additional projects (e.g., the widening of Kenilworth Avenue to accommodate increased traffic), that must be made clear and any associated impacts should be addressed in the DEIS and covered under the same permit as the project.	Comment noted. This information would be determined during the Proposed Action's permitting process. Please also refer to the Master Response provided under "Perceived "Connected" Actions" in Section 9.0 of the FEIS.	Water Resources	Holly Simmons	City of Greenbelt

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270	3	041	<p>The EIS technical memo also describes the current nature of the site as follows: “The primarily pervious nature of the site facilitates stormwater infiltration into the ground; the site is also largely vegetated, so runoff does not contain high concentrations of pollutants or sediment.” (p.7, lines 102-104)</p> <p>The report then goes on to cite the proposed increase in impervious surface: “...the Proposed Action would increase impervious surface cover on the Project Site by 29.4 acres for a total of 46.7 acres, or 38.2 percent of the Project Site. As a result, stormwater runoff volumes discharging from the Project Site to receiving waterbodies could increase, with corresponding increases in concentrations of pollutants and sediments.</p> <p>As shown on Figure 3, however, Treasury would properly design, construct, and maintain GI/LID stormwater infrastructure on the Project Site that would comply with state of Maryland requirements and Section 438 of the EISA, ensuring that pre-development hydrology is maintained on-site to the maximum extent technically feasible and no significant adverse impacts related to stormwater occur. Stormwater control BMPs identified under EO 13508 would also be integrated into the Project Site design to control and reduce water pollution coming from federal facilities to protect the Chesapeake Bay and its tributaries. As such, no or negligible adverse impacts to stormwater would be expected.” (p. 12, lines 266-276)</p>	Comment noted.	Water Resources	Tom Taylor Member of Beaverdam Creek Watershed Watch Group
271	6	041	<p>We also are concerned about harmful effects to wetlands at BARC. In the Draft Finding of No Practicable Alternative for Construction and Operation of a Currency Production Facility at the Beltsville Agricultural Research Center, Maryland (attached to the technical report), the report states that “approximately 0.94 acres” (about one-third) of the 2.94 acres of “wetlands identified within the Project Action Site” would be permanently affected, “and up to 2 additional acres of wetlands may be subject to temporary, construction-related effects.” (p. 2)</p> <p>As the technical memo notes: “Wetlands perform diverse hydrologic functions such as water quality improvement, groundwater recharge, pollution mitigation, nutrient cycling, and stormwater and floodwater storage. Wetlands also provide wildlife habitat and have socioeconomic benefits...” (p. 7, footnote 6)</p>	Comment noted. Please refer to Response to Comment 268.	Water Resources FONPA	Tom Taylor Member of Beaverdam Creek Watershed Watch Group
272	7	041	<p>The Greenbelt area already has suffered significant wetland loss due to previous development. In this era of climate change, habitat loss, and other ecological damage, we need to preserve and protect remaining wetlands.</p>	Comment noted. Treasury would minimize impacts to wetlands to the extent practicable, and comply with all applicable regulations and permits. Please also refer to Responses to Comments 252 and 265.	Water Resources	Tom Taylor Member of Beaverdam Creek Watershed Watch Group
273	19	044	<p>Wetlands Six palustrine wetlands totaling 2.94 acres were delineated on the project site. Wetland 4, 7, and 8 were preliminarily determined to be jurisdictional waters subject to regulation under the Clean Water Act (CWA) Section 404 and Wetlands 2, 3, and 6 were isolated wetlands subject to the Maryland Department of the Environment (MDE) regulation. In total, the Proposed Action would impact 0.94 acre of wetlands, including fill of Wetlands 2, 3, 7, and 8, and potential impacts to 0.03 acre of Wetland 4.</p>	Comment noted.	Water Resources	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment

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274	20	044	We suggest that Treasury consider requirements anticipated for the future CWA 404 permit process. Please consider the following comments from the EPA Region 3 Water Division, Wetlands Branch: While EPA appreciates that Treasury has made deliberate efforts to minimize impacts and plans on avoiding the placement of structures within Wetland 4, we recommend evaluation of full avoidance of impacts to this wetland. Specifically, we recommend shifting the perimeter fence to avoid impacts or explaining why this is not practicable. If temporary impacts are required for construction, we recommend developing a plan specifying the BMPs and restoration measures that will be taken.	Comment noted. As described for Water Resources in Table 2.2-1 of the FEIS, Treasury would comply with Sections 404/401 of the CWA. As a portion of Wetland 4 extends off-site (i.e., beyond Treasury’s proposed property boundary), Treasury would not be able to fully avoid this wetland. No change made to the FEIS.	Water Resources	Carrie Traver	USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
275	21	044	We also recommend further evaluation of avoidance and minimization of impacts to Wetland 7 and 8. The DEIS states that these wetlands are located within the project Limit of Disturbance (LOD) associated with improvements to the existing Powder Mill Road but it is unclear why it is not practicable to avoid or minimize these impacts from information provided. (E.g. could the road be shifted to avoid grading impact, or could wetlands be restored after construction?) We recommend that additional documentation be provided to support the finding that these are unavoidable impacts.	Comment noted. Section 3.7.3 of the FEIS was revised to include a recommended mitigation measure to avoid Wetland 7 and/or Wetland 8 completely during project design and subsequent construction and operation (i.e., by adjusting proposed entrance road and Powder Mill Road improvements).	Water Resources	Carrie Traver	USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
276	22	044	In addition, the DEIS proposes the option of modifying the LOD associated with proposed entrance road upgrades and the proposed vehicle entry control facility as an alternative to diverting 117 linear feet of stream. EPA recommends further evaluation and documentation of the alternatives for the access road to avoid and minimize this impact to the extent practicable.	Comment noted. Treasury would consider this recommended mitigation measure and document its determination in the ROD, should the Preferred Alternative be selected. No change made to the FEIS.	Water Resources	Carrie Traver	USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
277	23	044	Once it is determined that the applicant has taken all appropriate and practicable steps to avoid and minimize adverse impacts, compensatory mitigation is then considered. EPA recommends that a compensatory mitigation plan be developed for unavoidable impacts to jurisdictional waters. We also recommend further consultation with MDE regarding appropriate mitigation for the impacts to state-regulated wetlands and buffers. Additionally, to determine appropriate mitigation, it would be helpful to include an assessment of the impacted wetlands’ functions and quality. As part of the overall site design, we also suggest evaluating opportunities to enhance the quality and functioning of stream and wetland resources onsite or in the vicinity, including enhancing native vegetation in wetlands and/or managing invasive species.	Comment noted. This would be determined in consultation with USACE and the MDE during the permitting process. Please also refer to Responses to Comments 252, 265, 274, 275, and 276. No change made to the FEIS.	Water Resources	Carrie Traver	USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
278	3	048	The initial Draft EIS summary chart posted was reviewed at a community meeting on November 9, 2020 and noted significant impact on only the two (2) streams on the proposed location, yet the current version now shows five (5) areas of significant impact. If materials are updated, they should be noted as such with the date and time along with a summary page of changes.	Comment noted. The DEIS was published on November 6, 2020 and was not revised until after the 45-day public comment period (i.e., publication of the FEIS). No change made to the FEIS.	Water Resources	Thomas E. Dernoga c/o Michelle Garcia	Prince George’s County Council

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279	6	052	The Phase II completed for this site identified heavy metals in the soil; albeit these appear to be at background levels. In addition, during demolition there is potential for air transport of lead, from LBP, and/or asbestos. However, there is a potential that, during the long construction period, these airborne metal particulates could be concentrated in wetlands and streams downwind via fugitive dust emissions. These may impact sensitive hydrophytic plants and aquatic species. In addition, the use history of this site as an agricultural research facility is a concern. There is a potential that underlying soils may include pesticide residue and other research-oriented contaminants which could be particulated and transported during excavation.	Comment noted. Fugitive dust is not considered a potential wetland impact, as fugitive dust emissions from proposed construction activities would be controlled as identified in Section 3.4 and Table 2.2-1 of the FEIS. No change made to the FEIS.	Water Resources	Kobe Ramirez c/o Julian Grauer	Environmental Review, Inc.
PM-1	1	100	I just wanted to note that the location, the site location, is in Tier II watershed.	Comment noted. This is documented in Section 3.7.1.3 of the FEIS. No change made to the FEIS.	Water Resources	Amanda Malcolm	MDE

Section 3.7 - Water Resources - Wastewater Treatment - On-site Treatment

280	5	003	I would also like to see more clear information about the source of water used at the plant, and plans for treating waste water. Will water be drawn from WSSC treated water or from a local source? Will "used" water be sent to the Blue Plains or another area treatment facility, or will it be treated on site? Will those treatment plants be able to reduce discharged water to safe conditions?	Please refer to the Master Response provided under "Wastewater Treatment - On-site Treatment" and "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment	John Ausema	
281	2	011	2) The EPA has cited the Bureau of Engraving and Printing for non-compliance in use of hazardous chemicals, and there is no mention (apart from a brief statement on "safe storage") on how the chemicals will be treated before release into the water; additionally, no plans are made for water cleaning/treatment before being released into the fields. This can put potentially dangerous chemicals in a pristine area that is the BARC site, as well as negatively affect the health of the people, flora, and fauna at the site.	Please refer to the Master Response provided under "Wastewater Treatment - On-site Treatment" and "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment	Vijay Parameshwaran	
282	25	016	(Table 2.2-1, Water Resources, Operation) For completeness, the BMPs and regulatory compliance measures (RCMs) that will be employed regarding the onsite wastewater treatment facility that will collect and recycle wiping solution and potentially plating line water over the life of the project should be addressed.	Please refer to the Master Response provided under "Wastewater Treatment - On-site Treatment" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment Environmental Impact Reduction	Debbie McKinley	
283	68	016	(Lines 2781-2782) The DEIS should identify the chemicals that will be treated by the onsite plant, identify the type or types of wastewater treatment processes proposed for installation and why these processes were selected, discuss the expected treatment efficiencies of these processes, discuss the expected discharge concentrations for each of the chemicals to be treated, and discuss how these discharge concentrations compare to local, state, and federal standards.	Please refer to the Master Response provided under "Wastewater Treatment - On-site Treatment" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment	Debbie McKinley	

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284	5	027	Also, the DEIS needs to include the water and sewer requirements for the facility and the impact on the existing system. It should include information on any special systems required to handle the by-products of the printing and engraving process to ensure that chemicals or other toxic by-products are not entering the sewer system.	Please refer to the Master Response provided under "Wastewater Treatment - On-site Treatment" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment	Philip S. Aronson
285	53	039	The DEIS does not provide a comprehensive understanding of CPF wastewater composition, characteristics, and effluent standards. The Hazardous and Toxic Materials and Waste portion of the DEIS states that "the largest amount of hazardous waste would be generated from wastewater treatment from nickel and chrome plating operations (i.e., 22,500 pounds [lbs] per year", but the DEIS does not provide a complete breakdown of CPF wastewater composition (including anticipated material/pollutant types and amounts/proportions) and the specific effluent standards to which the water will be treated. The DEIS states that hazardous waste generated on-site would either be treated off-site prior to disposal or incinerated off-site in accordance with federal and state requirements; however, the DEIS does not indicate the effectiveness of wastewater treatment. The DEIS does not provide specifics regarding types and amounts of organic and inorganic pollutants that the treated water may retain when discharged into receiving waters of Beaver Dam Creek. It is unclear whether the wastewater would retain amounts of nickel, chrome, lead, arsenic, waste solvent, corrosive waste, etc. The DEIS also does not provide the anticipated temperature or velocity of discharged waters.	Please refer to the Master Response provided under "Wastewater Treatment - On-site Treatment" and "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment	Holly Simmons City of Greenbelt
Section 3.7 - Water Resources - Wastewater Treatment - BARC East WWTP and Beaverdam Creek						
286	3	015	In a complete evaluation of this proposed development, discussion of the existing footprint and operations in DC and its impact on the Anacostia River would be measured and remediation of the existing site and surrounding waterway, discharge to the public sewer system, and air would be discussed. There will be air and water quality impacts from the proposed and possible future manufacturing of cash and equivalents at the site. This might be part of the LEED assessment. We also recommend applying for the American Society of Landscape Architects Sustainable Sites Initiative for this project. Almost 40 years ago I worked for an environmental consulting firm that conducted a large assessment of the environmental activities at the BEP facility in DC. The wastewater discharge was a slurry the color of money. The volatile organic compounds generated from the use of inks, I believe, was one of the factors that led to the discontinuance of stamp printing there. This could be a positive affect in the mass balance of this proposed move if made part of the calculation. Specifically, I believe there to be offsite contamination that resulted from operations that will need to be remediated and the river compensated as part of the Natural Resources Damage Assessment currently being conducted.	Please refer to the Master Response provided under "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment	James Foster Anacostia Watershed Society (AWS)

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287	22	016	(Table 2.2-1, Water Resources, Operation) For completeness, the BMPs that will be employed to comply with the existing discharge permit issued by the Maryland Department of the Environment (MDE) for the BARC East Wastewater Treatment Plant (WWTP) over the life of the project should be addressed.	Please refer to the Master Response provided under "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment Environmental Impact Reduction	Debbie McKinley
288	58	016	(Lines 1827-1829) No supporting information is provided for this conclusion. No discharge data are provided for the receiving wastewater treatment plant (WWTP) to support the assertion that 120,000 gallons per day (GPD) of wastewater discharges would be a minor increase in the existing flow of Beaverdam Creek. No flow data for Beaverdam Creek are provided. No hydraulic calculations are provided showing the capacity of the Beaverdam Creek streambed and no calculations are provided to show that an additional 120,000 gpd discharge would be a minor increase and would result in less-than-significant adverse impacts on the flow of Beaverdam Creek. The information identified above should be provided. Merely stating increases would be minor does make it a reality.	Please refer to the Master Response provided under "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment	Debbie McKinley
289	61	016	(Table 3.11-1) No documentation is provided to support the assertion that the USDA owned and operated WWTP has sufficient capacity. What is the design capacity of the WWTP? What is the current wastewater inflow to the WWTP? What is the anticipated total inflow (BARC facilities plus the CPF) to the WWTP under the Preferred Alternative? Documentation should be provided to show the WWTP does, in fact, have sufficient capacity to accept the CPF wastewater discharge.	Please refer to the Master Response provided under "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment	Debbie McKinley
290	5	026	Surface Water The DEIS states that the 120,000 gallons per day of wastewater produced by the operation of the proposed industrial facility would be treated at BARC's east wastewater treatment plant (WWTP). It goes on to state that the WWTP has sufficient permitted capacity, and, consequently, there would be less than significant adverse impacts to the receiving surface waters, including Beaverdam Creek. The DEIS does not detail the existing permitted capacity or any restrictions in the permit on the contents of wastewater flowing into the plant from a new industrial user. It seems unlikely that an NPDES permit for a WWTP would allow the treatment plant to accept a new industrial user without some constraints on the materials in the new industrial user's waste stream. (See Permit No. 15-DP-2525 (NPDES MD0020842) section II.14). The lack of discussion of the WWTP existing permit and the waste stream from the new industrial facility makes the conclusion of "less than significant impacts" a bald assertion, rather than the result of a reasoned analysis.	Please refer to the Master Response provided under "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment	Clara Kuehn

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291	4	028	The facility could also impact more distant BARC habitats, most notably Beaverdam Creek. This is a Tier II stream with good water quality that supports spawning anadromous fish. The EIS notes that treated sewage effluent from the BEP facility will be discharged to this small body of water; in fact, the amount of permitted discharge will be increased by 60%. Beaverdam Creek is used in winter by a wide variety of waterfowl that feed on aquatic vegetation, and is also the site of an active Bald Eagle nest. There is no serious discussion of the impact of discharge of treated effluent and how it may affect birds and other wildlife	Please refer to the Master Response provided under "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Biological Resources Wastewater Treatment	Kurt R. Schwarz	MD Ornithological Society
292	12	032	From what I hear, operations of the proposed new BEP could adversely impact Beaverdam Creek by releasing treated sewage effluent (a permit is required but presumably could be obtained), and the volume will be increased by 60%. How is an increase of 60% less than significant? I know Beaverdam Creek is used by many species of wildlife, and there is an active Bald Eagle nest close by. Yet the DEIS has very little data or evaluation of these water resource impacts.	Please refer to the Master Response provided under "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment	Jeff Shenot	
293	51	039	X. Beaver Dam Creek and Surface Waters One of the primary concerns raised by the City of Greenbelt during the public scoping period was "Wastewater discharge treatment and impact on Beaver Dam Creek". Beaver Dam Creek is considered an area of critical concern as a Tier II stream. The DEIS notes that operation of the proposed CPF would produce approximately 120,000 gallons per day of wastewater, all of which would be conveyed to BARC's East Waste Water Treatment Plant (WWTP, located 0.3 miles south of the Project Site), treated to "applicable effluent standards", and discharged to nearby surface waters. The following issues that must be addressed in the DEIS include:	Please refer to the Master Response provided under "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment	Holly Simmons	City of Greenbelt
294	52	039	The DEIS fails to provide sufficient information regarding existing WWTP facility and permit. The DEIS does not include specifics regarding current and planned future wastewater treatment quantity and quality at BARC and the East WWTP specifically (sans CPF). The DEIS does not list BARC's current permitted capacity. It does not provide information regarding the efficiency of the existing treatment plant and any upgrades that may be necessary to address increases in wastewater and introduction of a new industry which may generate wastewater of a different composition. The DEIS does not show the location of discharge on plans.	Please refer to the Master Response provided under "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment	Holly Simmons	City of Greenbelt
295	54	039	Insufficient evidence and lack of clarity regarding determination of less-than-significant adverse impacts. The DEIS states that CPF operations would result in "less-than-significant adverse impacts on the flow of surface waters in the ROI, including Beaverdam Creek." It is unclear if this statement is intended to apply only to the flow of surface waters, or whether it is intended to apply to the hydrologic function and quality of surface waters as well. No information is provided regarding impacts to hydrologic function. The DEIS presents insufficient information to substantiate a claim that the CPF operations would have a less-than-significant adverse impact on Beaver Dam Creek's hydrologic function, flow, or quality.	Please refer to the Master Response provided under "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment	Holly Simmons	City of Greenbelt

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296	109	039	It is also unclear if the existing BARC East will require upgrades to address increases in wastewater and introduction of a new industry which may generate wastewater of a different composition. If upgrades or modifications are required, this action should be addressed in the DEIS.	Please refer to the Master Response provided under "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment	Holly Simmons City of Greenbelt
297	2	041	As a <redacted> resident and member of Beaverdam Creek Watershed Watch Group, I am concerned about negative impacts on the streams that flow through the BARC site. An unnamed tributary of Beaverdam Creek carries surface runoff from a large part of the proposed BEP site south to Beaverdam Creek. BEP proposes to pipe wastewater from the proposed facility to the BARC wastewater treatment plant. That plant releases treated effluent directly into Beaverdam Creek. In reference to Beaverdam Creek, the Water Resources Technical Memorandum of the EIS states: "Beaverdam Creek has remaining assimilative capacity, which means it is able to receive additional wastewater or pollutants, in accordance with applicable TMDLs and permitting requirements, relative to current conditions while still maintaining its status as a Tier II water." (p. 6, lines 65-68) However, the technical memorandum goes on to state the following about the overall conditions of the Anacostia Watershed, of which Beaverdam Creek is a part: "Due to the intense development of the Anacostia Watershed, the watershed has poor ecological conditions and degraded water quality. A 2019 'report card' issued by the Anacostia Watershed Society gave the Anacostia Watershed a grade of 51 percent for overall health..." (p. 6, lines 77-79) It makes no sense to add increased burden to one of the healthier streams when the overall watershed is rated as "degraded." This will not advance water quality improvement in the DC region.	Please refer to the Master Response provided under "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment	Tom Taylor Member of Beaverdam Creek Watershed Watch Group
298	5	041	The technical memo cites the potential for higher stream volume as follows: "...operation of the Proposed Action could increase water volumes downstream of the BARC East WWTP, but these increases would be minor and would result in less-than-significant adverse impacts on the flow of surface waters in the ROI, including Beaverdam Creek. (p. 12, lines 252-255) But again, why risk some degradation of a healthy stream when the overall state of the Anacostia watershed is in poor condition, and there is no backup data that supports the above conclusion.	Please refer to the Master Response provided under "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment	Tom Taylor Member of Beaverdam Creek Watershed Watch Group
299	18	044	As indicated in Section 3.7.2.2, operation of the proposed CPF would produce approximately 120,000 gallons per day of wastewater that would be treated at the BARC East Wastewater Treatment Plant (WWTP) and discharged to nearby surface waters. We recommend that the potential for increased water volumes downstream of the WWTP, the specific capacity of the WWTP, and associated impacts to streams from the discharge be further supported in the Technical Memorandum.	Please refer to the Master Response provided under "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment

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300	3	047	The comments I submitted during the scoping public comment period also noted that concerns have been raised about wastewater disposal from this site, including questions about hazardous and toxic materials and the level of treatment of the wastewater. At the December 3, 2019, scoping meeting the answer provided was that existing clean water laws will be complied with. BEP should be committing to exceeding the minimal requirements of existing clean water laws, given the high quality of the local Beaverdam Creek watershed and its contribution to the challenged Anacostia River watershed. However, the DEIS presents plans based on the opposite commitment. The Water Resources Technical Memorandum presented in support of the DEIS states that "Beaverdam Creek has remaining assimilative capacity, which means it is able to receive additional wastewater or pollutants, in accordance with applicable TMDLs and permitting requirements, relative to current conditions while still maintaining its status as a Tier II water." (p. 6, lines 65-68), then goes on to state that the overall condition of the Anacostia Watershed is characterized by "poor ecological conditions and degraded water quality" (p. 6, lines 77-79). So, the DEIS is proposing the illogical approach of adding increased burden to one of the healthier streams when the overall watershed is rated as "degraded." This alone argues for the no action alternative.	Please refer to the Master Response provided under "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment	Benjamin Fischler	
301	15	048	Environmental – Watersheds. The BARC property is home to several watersheds, including the Indian Creek and Upper Beaverdam Creek, as well as wetlands and groundwater. The Draft EIS states that the new CPF will produce an additional 120,000 gallons per day to be treated and discharged into the existing watershed. and states that this will have less-than significant impacts on the flow of surface waters (including Beaverdam Creek). The impact of this discharge, in addition to the removal of wetlands and the paving of 100 acres, was not fully analyzed in the study. The County is just completing a project to raise a section of Sunnyside Avenue (adjacent to the BARC property) that drains to the same creeks due to chronic flooding. The longstanding problem raises significant doubts of whether the Draft EIS conclusion of "no significant impact" is correct.	Please refer to the Master Response provided under "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment	Thomas E. Dernoga c/o Michelle Garcia	Prince George's County Council
PM-7	1	103	I'm on the Maryland Ornithological Society's State Conservation Committee. I'm also retired from the EPA Chesapeake Bay Program and the University of Maryland Sea Grant Program. So my primary interest is not only in the natural resources, but also in the hydrology of the region and the potential impact of this on the receiving waters of Beaverdam Creek. I realize I need to look at this EIS a little bit more. I'm concerned about the amount of effluent, treated effluent, that would be almost doubling the permitted amount of Beaverdam Creek from this facility and also filtration replacement of infiltrating meadows and woods with impervious surfaces.	Please refer to the Master Response provided under "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment	Gail Mackiernan	MD Ornithological Society's State Conservation Committee
PM-10	1	105	My comments were that this project is inappropriate for the farm. This is an industrial use of a farm area. And the amount of wastewater and the effluent that would be dumped into Beaverdam Creek is unacceptable. I mean, that creek cannot handle what is being proposed to go into it. And that's going to have a very big impact on not only Beaverdam Creek, but down the stream from Beaverdam Creek and the Indian Creek and down into the Anacostia and on down. So this project is being sited in the wrong place. It should not be on BARC at all.	Please refer to the Master Response provided under "Wastewater Treatment - BARC East WWTP and Beaverdam Creek" in Section 9.0 of the FEIS.	Water Resources Wastewater Treatment Land Use	Rodney Roberts	Greenbelt City Council

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Section 3.7 - Water Resources - Stormwater Management / Green Infrastructure / Low Impact Development							
302	4	003	There will be an increase in impervious surface from the roof and parking lot. The site should use "green infrastructure" techniques to manage stormwater rather than building large artificial retention ponds. These elements can be added between parking rows and adjacent to the lot, as well as near the building.	Please refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS.	Water Resources Stormwater / GI / LID	John Ausema	
303	7	010	The site plan does not show how the site would be graded or how the stormwater would be handled in sufficient detail to determine if the small green spots shown are adequate to handle a million sf of impervious surface without damaging the downstream watershed. This project will have downstream effects on Anne Arundel County and the Chesapeake Bay. Ellicott City is a casualty of this type of flawed analysis. Any person of common sense could have predicted that Ellicott City would be affected by the complete paving over of its upstream watershed but the evaluation process did not require the developer to prove otherwise. Each project evaluated in isolation may not show the full impact yet cumulative impacts can be predicted and should be studied. We can learn from this horrific failure of foresight and should do so for this project. Increasingly frequent severe rainstorms need to be considered. Climate change is real. That the NEPA format does not require evaluation of future climate conditions is a defect of NEPA but is certainly something that needs to be considered for responsible decision making. Stormwater is not even an impact topic in this EIS.	Please refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS. Additionally, please refer to Sections 3.7 and 4.0 of the FEIS for discussion of stormwater impacts and cumulative impacts, respectively.	Water Resources Stormwater / GI / LID	Carolyn Mitchell	
304	2	027	The College Park area has three streams that will be impacted by the project: Indian Creek, Little Paint Branch and Paint Branch. As many neighborhoods in the City lie within the 100-year floodplain, the increases in impervious surface from the project and changes to groundwater and hydrology, elevate the risk for increased flooding. The BARC is home to several watersheds including the Indian Creek and Upper Beaverdam Creek. The DEIS states that there will be permanent fill of 0.94 acres of wetlands and 0.65 acres of wetland buffer, as well as the potential for increased storm water volume and runoff, sedimentation, and soil contamination. The potential impacts to these watersheds need to be considered in detail to show the impacts on local streams. Additional floodplain modeling for this watershed must be done at this time to understand the full impacts and offer mitigation strategies. It cannot wait until later in the design phase. I am also concerned that local water quality will be negatively affected.	Please refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS.	Water Resources Stormwater / GI / LID	Philip S. Aronson	
305	57	039	XI. Stormwater The DEIS asserts that no or negligible adverse impacts to stormwater are expected; however, evidence is not provided to support this claim. Without information to support this claim, it is difficult to imagine that the 29.4 acres of impervious surfaces that would be added by the Project would not have significant adverse impacts. The City offers the following comments:	Please refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS.	Water Resources Stormwater / GI / LID	Holly Simmons	City of Greenbelt

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Comment #	Comment # by Reviewer	Commenter ID#	Comment	Response to Comment Blue Shading: Change made to the FEIS. Green Shading: No change made to the FEIS.	Topic(s)	Name	Organization (if applicable)
306	58	039	Regulatory requirements and stormwater proposal not included in DEIS. The DEIS states that the Project would comply with applicable state and federal stormwater regulations (specifically “Section 438 of the EISA and EO 13508”), but it does not clarify specific regulatory requirements or provide information regarding Treasury’s proposed compliance measures. The Water Resources Technical Memorandum states, “To comply with Section 438 of the EISA, federal agencies are required to conduct an analysis of pre-development hydrology to establish a baseline condition and set design objectives for stormwater management that maintain predevelopment conditions with regard to temperature, rate, volume, and duration of flow associated with federal proposed actions.” This information must be included in the DEIS.	Please refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS.	Water Resources Stormwater / GI / LID	Holly Simmons	City of Greenbelt
307	59	039	Compliance with regulatory requirements may be insufficient to determine significance of impact. Additional information must be provided. The City notes that state and federal regulations do not require total quantity or quality treatment of all nutrients, but only keynote nutrients. It is conceivable that the Project could meet all federal and state requirements and still have an adverse impact. During the public scoping period, the US EPA recommended that the EIS should “outline specific measures to protect surface waters” and include in the analysis a discussion of “how the proposed stormwater management facilities protect water quality by addressing pollutants such as runoff from parking lots (including thermal impacts, heavy metals and petroleum/oils) and landscape pollutants (such as fertilizers, pesticides, bacteria, and sediment) from entering surface waters.” The DEIS does not address these concerns.	Please refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS.	Water Resources Stormwater / GI / LID	Holly Simmons	City of Greenbelt
308	4	041	In a time of projected significantly higher amounts of rainfall due to climate change, construction of the proposed facility would reduce the existing amount of naturally occurring filtration at the site. Though the report cites use of BMP’s “to control and reduce water pollution,” no backup data and support are provided to show how this will be accomplished specifically. Specific BMP’s also are not identified, making it difficult to assess their potential benefits in relation to the harmful effects that need to be remedied.	Please refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS.	Water Resources Stormwater / GI / LID	Tom Taylor	Member of Beaverdam Creek Watershed Watch Group
309	4	044	While the new CPF will be a state-of-the-art manufacturing facility, we recommend that innovation and cutting-edge technology be incorporated into the site design and construction methods. We suggest fully applying the principles of low impact design to limit disturbance and maximize natural infrastructure to reduce the physical and environmental footprint of the facility. Such a design would be more compatible with the mission of BARC to leverage science-based technologies for sustainable systems. We also continue to encourage ongoing community engagement and involvement to address concerns as the design moves forward.	Please refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS. Please also refer to Response to Comment 14.	Description of the Proposed Action Stormwater / GI / LID	Carrie Traver	USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment

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310	17	044	<p>Water Resources Surface Waters and Water Quality</p> <p>As indicated, the Proposed Action would increase impervious surface cover by 29.4 acres, comprising 38.2 percent of the Project Site. The DEIS indicates that green infrastructure or low impact development (GI/LID) measures will be used to maintain the pre-development hydrology and stormwater control BMPs will be incorporated; however, at this time only the conceptual location of stormwater facilities is shown.</p> <p>The substantial increase in impervious surface cover necessitates a suite of BMPs to reduce potential impacts from stormwater discharging to the streams onsite. We encourage incorporation of LID early in the site design. We recommend evaluation of specific measures that would likely be taken to protect water quality, including limiting the disturbance area during construction and reducing the size of the building and parking areas. We continue to recommend consideration of opportunities to minimize the construction of impervious areas associated with the facility such as parking, sidewalks, and roads. Such efforts include construction of multiple floors for office structures, structured or reduced parking, and pervious pavement options for emergency access roads and sidewalk areas. We also continue to recommend specifically addressing pollutants from parking lot runoff and landscaping such as fertilizers and pesticides.</p>	<p>Please refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS. Please also refer to Responses to Comments 30 and 31.</p>	Water Resources Stormwater / GI / LID	Carrie Traver	USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
311	29	044	<p>We recommend consideration of wetland creation areas for stormwater management onsite and that the stormwater management be constructed and maintained to provide wildlife habitat value.</p>	<p>Please refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS.</p>	Water Resources Stormwater / GI / LID	Carrie Traver	USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
312	4	045	<p>Water Resources</p> <p>The proposed project should meet and exceed all applicable County stormwater management requirements, including for both water quantity and quality as established under the County's Erosion And Sediment Control And Stormwater Management provisions. In addition, all controls should be managed on-site and minimum impact on the identified water resources, including streams, wetlands and the Beaverdam Creek.</p>	<p>Please refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS.</p>	Water Resources Stormwater / GI / LID Topography and Soils	Todd M. Turner	County Council Member, 4th District Prince George's County Council
313	7	046	<p>7. The treatment of the discharge to the existing drainage systems does not appear to be adequate.</p>	<p>Please refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS.</p>	Water Resources Stormwater / GI / LID	Albert Klein	

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314	2	049	<p>The second major realm of concern is that as a frequent runner through the BARC, I appreciate just how important water is in that area, not least for the wildlife it supports, including eagles, and the generally slow drainage or episodically swampy areas through the area. Those waters are good for the insects, birds, and then the birders who come to the area.</p> <p>The water management plan, especially storm water, is exceedingly vague and not in accord (at least) with EO 13508. Insofar as anything quantitative may be inferred, it is only backwards looking -- flood plains as determined by FEMA (2016), which use only past observations. But EO 13508 promotes considering climate change effects in the Chesapeake Bay watershed, which the draft EIS notes this construction is in. The draft EIS ignores impacts of changing rainfall levels (6c) and the potential impacts of more severe storms (6e), noted in EO 13508.</p> <p>Even if the planned storm water and wastewater treatment plans were sufficient to avoid damage to the Chesapeake under past climate conditions, which nothing has been presented to support, there is no reason to believe that those plans will respond sufficiently to the climate that will be experienced over the life of this plant. In particular, it has long been known in the meteorological community that rainfall events are becoming more severe in MD (e.g. Karl and Knight, Bulletin of the American Meteorological Society, 1998), and the scientific support for this has only grown in the interim. See, for example, the 4th National Climate Assessment, released in 2018 by the US Global Change Research Program.</p>	<p>Please refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS.</p>	Water Resources Stormwater / GI / LID	Robert Grumbine	
315	3	049	<p>Just looking at the map, it appears (figure 3.7-3) that the proposed 'stormwater feature's are comparable in size to the wetland 2,3, and parts of 4, that will be filled (lost). Numbers should be provided to area, depth, reserve capacity. In any case, many acres (1179 capacity parking lot in addition to the building itself) of impervious surface are being introduced and little or no net new stormwater / wetland area or capacity is being introduced. It is therefore highly implausible that there will be 'no or negligible adverse impacts' as claimed (line 1848).</p> <p>More than merely the water path, the contents of the water running off the newly impervious surface is not mentioned as to treatment and impact on local ecosystems down to the Chesapeake Bay. No mention is made of the ability of the stormwater treatment approach to cope with parking lot material runoff (hydrocarbons, heavy metals, plastics, ...), even for the current climate.</p>	<p>Please refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS.</p>	Water Resources Stormwater / GI / LID	Robert Grumbine	

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316	4	049	Regarding current climate, the EIS never defines what climate values are used -- a critical point especially for storm water. The EISA 438 is nonrestrictive as to methods at the planning tool or preliminary design stage (table 19), and no mention is made of what methods are used in the Draft EIS. As only one is considered suitable for later stage planning, it is important to know what has been done. Further, 438 is ambiguous as to how much data must or may not be used. e.g., in calculating 95th percentile rainfall event (pg 22), it mentions only a minimum of 10 years. It does not mention that no more than NN (some number) may be used. Given the changing climate, going back 70 years will give a misleading idea (too low) even of current 95th percentile rain events. NCDC is noted (in 438) as a data source to use; they are now NCEI. Climate normals are recalculated every decade, in the X1 years, (2011, 2021, 2031, ...). Even if appropriate use was made of current climate normals in the Draft EIS, they will be obsolete before this message is read. Much less, with climate change, for the operating life of this plant.	Please refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS.	Water Resources Stormwater / GI / LID	Robert Grumbine	
317	2	051	Figure 3.7.3 shows no BMPs. There is nothing in the EIS Draft that mentions specific requirements for sediment control and stormwater management approval in Maryland. The General Construction Permit is referenced but they have not cited the Maryland Stormwater Management and Erosion & Sediment Control Guidelines for State and Federal Projects. It is recommended that reference be made to MDE's sediment and stormwater regulations, guidelines, and technical procedures. The procedures presented in the Maryland Stormwater Management and Erosion & Sediment Control Guidelines for State and Federal Projects and our webpage will need to be followed. https://mde.maryland.gov/programs/water/StormwaterManagementProgram/Pages/PlanReviewforStateandFederalProjects.aspx	Please refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS. Additionally, Table 1 of the Water Resources Technical Memorandum was revised to include Maryland's Erosion and Sediment Control Regulations, Stormwater Management Regulations, and Maryland Stormwater Management and Erosion & Sediment Control Guidelines for State and Federal Projects (including associated technical memoranda). Finally, Table 2.2-1 of the FEIS was revised to include an EPM/RCM that Treasury would comply with these regulations, guidance, and technical memoranda.	Water Resources Stormwater / GI / LID	Amanda Malcolm	MDE
318	3	051	Section 3.11.1.2 Applicable Guidance states, "The EISA and EO 13508 also require agencies to maintain the pre-development hydrology of project sites and manage stormwater runoff through the consideration of GI/LID features (see Section 3.7)." In addition, MD Regulations will have to be met which in some regards could be more conservative.	Please refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS.	Water Resources Stormwater / GI / LID Utilities	Amanda Malcolm	MDE

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Section 3.8 - Biological Resources - General							
319	2	001	I wish to comment on the EIS for the proposed treasury manufacturing facility to be built on the Agricultural Research Center. I have read the EIS and as a concerned citizen and resident of <redacted> I found the EIS woefully inadequate. Aside from the factual error that there are no bald eagles living near the proposed facility (there are). They have not addressed the following issues: What are they doing to protect the endangered northern long eared bat that lives there? What are they doing to monitor and mitigate noise from the moving trucks and the production facility itself? What are they doing to monitor and control light pollution from the large parking lot that will be used 24/7? Have they discussed with the residents on Odell Rd. how this facility will impact their community. I have heard the designated land has toxic waste on it. What will they do to clean it up? These were not addressed in the EIS.	<p><u>Bald Eagle Nest</u>: Please refer to the Master Response provided under "Potential Impacts to Bald Eagles" in Section 9.0 of the FEIS.</p> <p><u>NLEB</u>: Treasury conducted an acoustic survey for federally threatened NLEBs at the Project Site; no NLEBs were documented (see Section 3.8.1.3 of the FEIS). Further, as discussed in Section 3.8.2.2 of the FEIS and determined in consultation with the USFWS, the Proposed Action would comply with the ESA with respect to the NLEB.</p> <p><u>Noise and Light</u>: EPMS and RCMs regarding noise and light are listed in Table 2.2-1 of the FEIS. Potential impacts to these resource areas are discussed in Sections 3.5 and 3.3 of the FEIS, respectively.</p> <p><u>Odell Road Residents</u>: Treasury has engaged the public and surrounding local communities in the development of this Proposed Action and this EIS. The residents of Odell Road are included on Treasury's mailing list for this Proposed Action and this NEPA process.</p> <p><u>Hazardous Waste</u>: Treasury evaluated potential concerns associated with HTMW by completing an ECOP report and a Phase II investigation. The results of these reports and potential impacts of the Proposed Action are discussed in Section 3.13 of the FEIS and the Hazardous and Toxic Materials and Waste Technical Memorandum.</p> <p>No change made to the FEIS aside from that noted for bald eagles.</p>	Biological Resources Noise Visual Resources Public Participation HTMW	Mary Ann Canter	
320	3	28	The placing of a huge industrial facility in what is now an almost undisturbed agricultural, field and woodlot habitat will not only create local disturbance, it will also result in serious habitat fragmentation. The EIS notes significant direct loss of woodland, grassland, and wetland habitat on site. But in addition, the operation of the facility will introduce noise, light, traffic and human disturbance that will certainly have a wider impact. There is considerable research now on the negative impacts of even distant noise and light on bird breeding success. Birds are especially sensitive to noise and light, and such "sensory pollutants" must be taken into account when assessing environmental impacts of any action.	Comment noted. Please refer to Section 3.8.2.2 of the FEIS for potential impacts to biological resources from the Proposed Action. No change made to the FEIS.	Biological Resources	Kurt R. Schwarz	MD Ornithological Society

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321	5	032	<p>More importantly to me, as a wildlife biologist, is the inadequate descriptions of Biological Resources and evaluation of potential impacts to them. The most egregiously inadequate descriptions in the Affected Environment are:</p> <p>1)Wildlife (lines 1936-1940): "Wildlife species in the ROI are those common to semi-rural/suburban areas in central Maryland. Wildlife habitat in the ROI includes forest, open meadows, agricultural fields, emergent wetlands, and surface water. Additionally, the Project Site contains numerous bird nest boxes that provide habitat for cavity-nesting bird species such as eastern bluebird (<i>Sialia sialis</i>) and tree swallow (<i>Tachycineta bicolor</i>). Hunting is generally restricted within the ROI due to proximity to developed lands."</p> <p>2)Migratory Birds (lines 1957-1961) "Migratory birds use BARC, including the Project Site, as seasonal feeding ground, breeding ground, or for temporary stop-over during migration (USFWS, 2020a). The USFWS identifies 12 migratory birds with the potential to occur on the Project Site; these birds are also designated as Birds of Conservation Concern (BCCs18) (USFWS, 2020b). All 12 migratory birds have been observed on BARC, although only eight have been specifically reported within the ROI (Cornell Lab of Ornithology, 2020)."</p>	Comment noted.	Biological Resources	Jeff Shenot	
322	6	032	<p>And the most inadequate analysis provided in the Environmental Effects are:1) Wildlife (lines 2002-2014)"During construction, wildlife would be displaced from the Project Site into adjacent areas in the ROI; wildlife within the ROI would be disturbed by both construction noise and wildlife moving from the Project Site to adjacent areas. Less mobile species on the Project Site could be killed by construction equipment. As the Project Site does not include areas critical to wildlife movement, wildlife habitat fragmentation would be negligible. Treasury would coordinate with the owner(s) of the on-site bird nest boxes to have them relocated from the Project Site prior to construction. Relocation would occur during the non-nesting period for bluebirds and tree swallows. Overall, wildlife habitat loss associated with the Preferred Alternative would not contribute to any appreciable decline in wildlife populations in the ROI. All other potential impacts to wildlife from construction would be localized and occur on a temporary basis. As such, construction of the Preferred Alternative would result in less-than-significant adverse impacts on wildlife. The Proposed Action would not substantially reduce regionally or locally important habitat or substantially diminish a regionally or locally important plant or animal species."</p>	Comment noted.	Biological Resources	Jeff Shenot	
323	8	032	<p>There are only 4 lines of text describing affected wildlife that is present in the area of potential impact (other than T&E species, which it only identified 1 species - Long Eared Bat; I will not comment on that since it is up to US DOI and MD DNR to do that). Likewise, there are only 12 lines provided for analysis of consequences of construction and operations. This would be an adequate evaluation of potential impacts to wildlife for a typical small proposed action that would be expected in an EA (i.e., building a new bridge over a stream on Powder Mill Road). But this is an EIS, and it is grossly inadequate given the significant natural resources present in this area and the potential impacts from both construction and operations.</p>	Comment noted.	Biological Resources	Jeff Shenot	

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324	10	032	The EIS identifies 149 specimen trees that would have to be removed. This is a huge number of specimen trees for a project in the NCR! Most old individual mature trees are important habitat for wildlife and provide multiple functions ecologically. Despite the old abandoned buildings scattered in the proposed ROI, the current land use there is a wonderful blend of habitat comprised of mature trees encompassed within an old pasture, and it's adjacent to a forest on one side and BARC crop research area on the other. Anyone who has looked for birds more than once, knows that edge habitats are the greatest areas of diversity and this particular area at BARC has one of the greatest uses by birds of anywhere on BARC. Yet the DEIS states: "As the Project Site does not include areas critical to wildlife movement, wildlife habitat fragmentation would be negligible". This is a grossly undocumented conclusory statement.	Comment noted. Section 3.8.1.3 of the FEIS was revised to note the value of the forest edge habitat present on the Project Site to biodiversity. This section was further revised to note that BARC, and specifically the Project Site, is a popular location for bird watching. Section 3.8.2.2 was revised to note that habitat fragmentation would be negligible because the Project Site is bordered on three sides by residential development, active cropland, and active BARC facilities; while the Proposed Action would result in habitat loss, the Project Site would not fragment a larger contiguous natural habitat.	Biological Resources	Jeff Shenot
325	11	032	I have huge concerns regarding the long term adverse operational impacts (noise, night light, human disturbances, building collisions, etc). The potential impacts from this to biological resources are almost completely dismissed, and conclusively summarized as less than significant without any substantive evaluation. Constructing and operating an industrial facility in agricultural, field and wooded habitats will result in substantial and possibly significant habitat fragmentation. That is the purpose of doing a NEPA analysis but this document fails to do so and its conclusory determinations are unsupported.	Comment noted. Please refer to Response to Comment 324.	Biological Resources	Jeff Shenot
326	2	036	A study published in 2019, in the journal Science, concluded habitat connectivity enhances diversity. Fragmentation of ecosystems leads to loss of biodiversity in the remaining habitat patches but retaining connecting corridors can reduce these losses. They concluded "restoring habitat connectivity may thus be a powerful technique for conserving biodiversity, and investment in connections can be expected to magnify conservation benefit." There is a benefit to not breaking up BARC green space. The 2018 Agriculture Bill signed by President Trump makes EQIP, THE ENVIRONMENTAL QUALITY INITIATIVE PROGRAM a priority, including the promotion of habitat conservation. The National Resources Conservation Service has an office here at BARC on Beaver Dam Road. One of their programs is to increase wildlife habitat on farms. The land on Poultry Road is ideal for studying forest edge species, crop pollinators, and conservation bio-control buffers. This land can be utilized now and in the future for agricultural research and this can only be achieved without severely altering the current landscape.	Comment noted.	Biological Resources	Marcia and Robert Van Horn

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327	3	036	Also, the grassland of Poultry Research Road is distinct and acts as a carbon sink. In an August 19th, 2020 article in the Washington Post, Storing Carbon in the Prairie Grass, it was stated, "as part of photosynthesis, plants pull carbon dioxide from the atmosphere and store it in their stems, leaves and roots. Unlike trees, grasslands store most of their carbon underground, in their roots and the soil. And that makes them more reliable carbon sinks than forests." And, "land that has not been tilled or overgrazed has the potential to sequester the most carbon," said Hal Collins, a microbiologist with the Agricultural Research Service of the Department of Agriculture. "One acre of pristine prairie can store about five tons of carbon," he said. This month, five of America's largest conservation organizations called for bipartisan solutions to the crisis facing our native grasslands including passage of a new North American grasslands conservation act. This would invest in conserving and restoring our native grasslands for ranchers, wildlife, and future generations.	Comment noted. While the Project Site does not contain traditional prairies, as referenced in the Washington Post article, Section 3.8 of the FEIS was revised to note that the Project Site is generally a carbon sink under existing conditions due to its vegetated state, but would partially lose this function under the Proposed Action.	Biological Resources	Marcia and Robert Van Horn
328	4	036	There has been a steep reduction of acres in the Department of Agriculture's Conservation Reserve Program (CRP), run by the USDA Farm Service Agency. Over the last 13 years this decline has negatively impacted wildlife populations and soil health. Preserving these critical landscapes can address climate change, support wildlife, and restore waterways. Presidents of the National Wildlife Federation, Pheasants Forever and Quail Forever, National Wild Turkey Federation, Congressional Sportsmen Foundation, and Theodore Roosevelt Conservation Partnership conclude restoring grasslands is the main tenet of any comprehensive climate strategy. "Grasslands enrolled in the conservation reserve program already sequester an average of 49 million tons of greenhouse gases annually (equivalent of taking 9 million cars off the road each year), while reducing flooding and erosion during extreme weather events."	Comment noted. Please refer to Response to Comment 327.	Biological Resources	Marcia and Robert Van Horn
329	5	036	Poultry Research Road is excellent, yet diminishing, grassland and forest edge habitat. The almost 7,000 acres of BARC itself is the last large open green space between Washington and Baltimore. The United Nations just declared the next 10 years as the decade of ecosystem restoration. Loss of this particular site, (especially to a building far larger than anything on the east campus), within this green space, will have an adverse effect by disrupting this forest edge and grassland conservation corridor. Rather than fundamentally changing this habitat, we should conserve and restore it for future research and for its local and planetary benefit.	Comment noted. Section 3.8 of the FEIS was revised to describe the forest edge habitat present on the Project Site and note that it would be lost during construction of the Proposed Action. Please also refer to Response to Comment 324.	Biological Resources	Marcia and Robert Van Horn
330	23	039	The ROI provided for Biological Resources (including vegetation, wildlife, and migratory birds) is also a 1,500-foot buffer on the project site. Ecosystem, habitat, and natural connections are not addressed in this determination. More appropriate ROIs include: o Vegetative Resources: Watershed, forest, range, or ecosystem, o Resident Wildlife: Species habitat or ecosystem, o Migratory Wildlife: Breeding grounds, migration route, wintering areas, or total range of affected population units.	Comment noted. Vegetation and habitat on the Project Site are present on a larger landscape level. The Proposed Action would have no effect on the availability or presence of these areas. Please also refer to Responses to Comments 188, 86, 324, and 329. No change made to the FEIS.	Biological Resources	Holly Simmons City of Greenbelt

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331	70	039	XIII. Forest Retention The Proposed Action would result in the permanent removal of vegetative communities on the Project Site, including 3.6 acres of forest, 58.4 acres of open meadow with mature trees, 0.9 acres of emergent wetlands, and 20.7 acres of agricultural land. Up to 125 of the 149 specimen trees on the project site (84%) would be removed. Despite this, the DEIS claims that “tree removal [...] would be less than significant on the project site and negligible in the context of the overall ROI.” This claim is not sufficiently justified. The proposal will adversely impact Forest Stand 2, which is identified as a high priority stand for retention due to its mature successional stage, specimen trees, and lack of invasive species. The proposal will result in the removal of the majority of specimen trees onsite, adversely impact mature vegetation. The proposal to mitigate tree removal through the Forest Conservation Act (FCA) has not been made available; it is possible that requirements are proposed to be met through off-site planting outside of the watershed or through a fee-in-lieu, neither of which would serve to minimize the impacts of tree removal onsite. The only forest clearly shown to be retained onsite is already encumbered in easement.	Comment noted. The FCP and Planting Plan would be developed during the design phase. These plans, subject to MDNR review and approval, would prioritize on-site retention and on-site planting over off-site planting or fee-in-lieu. Table 2.2-1 of the FEIS was revised to note that Treasury would incorporate the NCPC's tree canopy and tree replacement policies into the design to the maximum extent practicable.	Biological Resources	Holly Simmons City of Greenbelt
332	71	039	In December 2019, USACE prepared a forest stand delineation (FSD) to identify, delineate, and characterize forest stands and specimen trees. 188 specimen trees were identified and characterized, and four forest stands were identified and prioritized based on observed characteristics in accordance with guidance from the Maryland State Forest Conservation Technical Manual. Since the time of the FSD, the project site appears to have been reconfigured. As a result, the majority of the four forest stands and many of the specimen trees are located in areas that are now being identified as outside of the project site in areas not proposed to be disturbed by the Proposed Action.	Comment noted.	Biological Resources	Holly Simmons City of Greenbelt
333	72	039	It is concerning that the limit of disturbance (LOD) would impact the existing FCE in the northeast corner of the site (Figure 3.8-1). The easement documents should be provided to clarify applicable protections and responsibilities. The conflict between the LOD and the FCE should be resolved. Treasury proposes to “retain and enhance existing landscape buffers” (Table 2.2.-1). Because the existing conservation easements were established and credited as mitigation for an earlier project, their continued retention (and/or any reconfiguration, if applicable) should not be considered as mitigation toward this project, but rather as a legal obligation. The DEIS claims “[t]he removal of specimen trees and forested areas during construction [...] would be offset by Treasury’s compliance with the FCA [Maryland Forest Conservation Act]”; however, it is unclear what measures Treasury plans to take to comply with the FCA. To substantiate these claims, the Forest Conservation Plan and Planting Plan that Treasury plans to develop should be prepared in accordance with the Maryland State Forest Conservation Technical Manual (1997) and made available with the DEIS. All applicable calculations should be made available, including net tract area (excluding forest already under easement), break-even, afforestation, and conservation thresholds. To maintain consistency with the current land use and zoning of the project site and BARC, these thresholds should be based on those required for an agricultural use, as opposed to an industrial use (which are less stringent). The plan should result in preservation and on-site planting to the maximum extent practicable. Any off-site planting should occur in the same watershed. Fee-in-lieu of planting should not be considered.	Comment noted. Minor disturbance to the forest conservation easements could occur from installation of the proposed security fence, although the precise alignment of the proposed security fence has not been finalized. Treasury's current design efforts are seeking to minimize or avoid impacts to these and other important Project Site environmental amenities. Section 3.8.2.2 of the FEIS was revised to note the potential for this minor disturbance to existing forest conservation easements. Section 1.3.3.1 of the Biological Resources Technical Memorandum was further revised to explain that Treasury would consult with MDNR regarding these disturbances through the MFCA compliance process. Treasury would minimize these impacts to the maximum extent practicable and consult with MDNR to ensure compliance with the legal obligations associated with these easements. The FCP and Planting Plan would be developed during the design phase. These plans, prepared in accordance with the Maryland State Forest Conservation Technical Manual (1997) and subject to MDNR review and approval, prioritize on-site retention and on-site planting over off-site planting or fee-in-lieu.	Biological Resources	Holly Simmons City of Greenbelt

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334	73	039	Additionally, the figures included in the FSD appendices should be revised as follows:1. FSD maps should include all elements required by Maryland State Forest Conservation Technical Manual;2. Sample points should be clearly and accurately located on the FSD map in Appendix B, to enable cross-referencing with data sheets in Appendix A; and3. Specimen trees should be clearly and accurately located on the FSD map in Appendix C. This will enable a more comprehensive understanding of the existing environmental resources onsite, including wetlands, streams, and steep slopes, and suggest possibilities for modification of the LOD to avoid impact to sensitive environmental features.	Comment noted. The MFCA compliance process would continue during the permitting phase of the Proposed Action. No change made to the FEIS.	Biological Resources	Holly Simmons City of Greenbelt
335	75	039	Because the FSD has revealed the high priority of forest stands 1, 2, and 4 (each of which is located substantially off-site and not proposed to be directly impacted by the Proposed Action), Treasury should work with BARC to protect these forest stands in their entirety by encumbering them with permanent protective easements. This would not only protect valuable forest land, but ensure a functional buffer to the east of the site into perpetuity. Additionally, as forest stands 1 and 4 have a moderate to high occurrence of invasive species, invasive management plans should be developed for these stands.	Comment noted. Treasury respects the USDA's authority to determine future use (or lack thereof) of off-site forested areas. If appropriate during Treasury's MFCA compliance process, Treasury may discuss long-term retention of these off-site forested areas, potentially including integration of invasive species management measures, with the USDA as potential means to meet its forest conservation requirements. No change made to the FEIS.	Biological Resources	Holly Simmons City of Greenbelt
336	77	039	While the DEIS recognizes the significant adverse impact of nighttime lighting on humans living nearby, it fails to recognize its impact on wildlife. The DEIS claims that "measures to reduce operational noise and light impacts, including using lighting fixtures that direct light to on-site areas" would minimize impacts to a less-than-significant adverse impacts to wildlife. This conclusion lacks justification. It is unclear why lighting would adversely affect humans but not animals, particularly those that are nocturnal. The potential impact of increased lighting on migratory birds (many of whom migrate at night and are impacted by light pollution which hides their navigational aids, the moon and stars) is also not addressed. As noted earlier in the Biological Resources portion of this memo, the significance threshold used to determine the intensity of impacts to biological resources is ill-suited to accurately assess impacts of the CPF's 24-hour operations and nighttime lighting on wildlife and wildlife habitat in and near the project site. The DEIS states that "Over time, many local wildlife species would adapt to these new conditions or relocate to other areas in the ROI," indicating that the Proposed Action would have, at a minimum, a short-term adverse impact that is not being accounted for. The City's previously-raised concerns regarding lighting and nighttime operations have not been fully addressed.	Comment noted. Section 3.8 of the FEIS notes that light impacts would adversely affect wildlife during operation of the Proposed Action. The text in Section 3.8 of the FEIS was revised to identify a potential adverse impact to migrating birds; the Project Site is in close proximity to an established, generally well-lit industrial and commercial corridor (i.e., US Route 1) and would not meaningfully affect the amount of light visible from the air on a landscape level. Table 2.2-1 of the FEIS was also revised to include an EPM under Visual Resources to design the proposed CPF in consideration of the International Dark Sky Association's five principles for responsible outdoor lighting; this EPM would also reduce potential adverse lighting impacts to wildlife.	Biological Resources	Holly Simmons City of Greenbelt

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337	78	039	The Biological Resources portion of the DEIS includes the following as an EMP, RCM, and BMP: "Incorporate noise and light abatement or shielding features into the design of the proposed CPF as identified in other resource areas (see the Noise Technical Memorandum and Visual Resources Technical Memorandum, respectively)." Therefore, it is anticipated that the following "mitigation measures" listed in the Visual Resources portion of the DEIS (the only light abatement features listed therein) will be included in the Proposed Action: 1. "Develop an exterior lighting plan for the proposed CPF that minimizes off-site light pollution, such as by using directional lighting that focuses light on areas within the project site, while still meeting site security requirements. 2. Use a spectrum of light generally perceived as more natural, such as light-emitting diode (i.e., LED), metal halide, or halogen elements. 3. Avoid high-intensity discharge (i.e., HID) or fluorescent lights (except compact fluorescent bulbs 226 that screw into standard sockets) on the exterior of buildings." For consistency, these measures must be included as EMPs in the Visual Resources section as well. An additional EPM that should be included with the proposal is the use of full cut-offs for all exterior lighting.	Comment noted. In Table 2.2-1 of the FEIS, this EPM for Biological Resources was revised to refer to the EPMs, specifically, identified for Noise and Visual Resources (i.e., for light).	Biological Resources Visual Resources	Holly Simmons	City of Greenbelt
338	79	039	XV. Wildlife The DEIS claims that the Proposed Action would have no significant adverse impacts to biological resources (this includes vegetation, wildlife, and migratory birds). Potential impacts on biological resources from light encroachment (addressed earlier in this memo) and noise were also analyzed. The City has concerns about the assessment of impact to wildlife, including migratory birds, as offers the following comments:	Comment noted.	Biological Resources	Holly Simmons	City of Greenbelt
339	80	039	Inadequate significance thresholds identified in the DEIS. The DEIS recognizes that the Proposed Action would result in the destruction of 83.6 acres of existing, vegetated wildlife habitat and the displacement and/or killing of wildlife currently living onsite; however, the DEIS claims that the Proposed Action would have a less-than-significant adverse impact on wildlife, as it "would not substantially reduce regionally or locally important habitat or substantially diminish a regionally or locally important plant or animal species." This may be a result of the insufficient significance threshold used in the Biological Resources portion of the DEIS, which fails to consider impacts to species that are not "regionally or locally important", or "federal- or state-listed species". To provide an accurate assessment, the definition must be expanded to include potential impacts to biological resources related to impacts to vegetation, aquatic wildlife species, terrestrial wildlife species, and special status species.	The significance threshold for each resource area in the FEIS was established by a qualified subject matter expert (SME) with ample years of experience analyzing effects within this geography for the resource area. Per CEQ NEPA Implementing Regulations (1978), potential impacts were assessed in terms of both context and intensity (40 CFR 1508.27). Based on this, informed decisions were made, regions of influence (ROIs) defined, and significance criteria established. The Government's impact analysis is based on the anticipated extent to which impacts from this Proposed Action would be meaningfully experienced. Given that the remaining acreage of the 6,500-acre BARC would remain in its current state, without Congressional action to re-allocate lands to other federal agencies for other purposes, Treasury reasonably anticipated that the balance of BARC would remain in its current state within the foreseeable future. In addition, BMPs, EPMs, and RCMs incorporated into the Proposed Action would further reduce the potential for adverse effects. Recommended mitigation measures would further reduce or avoid impacts, if accepted in the ROD and if the Preferred Alternative is ultimately selected. No change made to the FEIS.	Biological Resources	Holly Simmons	City of Greenbelt

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340	81	039	Failure to address impacts to aquatic wildlife and plant species onsite. The proposal will directly impact 226 linear feet of stream (117 to be diverted; 109 to be filled and not replaced), and approximately one acre of emergent wetlands. Impacts to aquatic species due to this action must be addressed in the DEIS.	Comment noted. Section 3.8 of the FEIS was revised to include a discussion of potential on-site and downstream impacts to aquatic species under the Preferred Alternative. Please also refer to Responses to Comments 274, 275, and 276.	Biological Resources	Holly Simmons City of Greenbelt
341	82	039	Failure to address impacts to aquatic and terrestrial species offsite. The CPF will discharge 120,000 gallons of wastewater each day into Beaver Dam Creek and will increase onsite impervious by 29.4 acres (31.2%). The analysis does not include potential impacts to wildlife and plant species in wetlands, waterways, and floodplains due to possible impacts including changes in hydrology; higher water temperatures; increased sedimentation, nutrient loading, and turbidity; increased runoff of metals (e.g., arsenic, chromium, and lead) which naturally occur at high concentrations in the soil and sediment of the project site; introduction of harmful chemicals; etc. As with other analyses, impacts due to implementation of transportation mitigation are not addressed.	Comment noted. Please refer to Response to Comment 340. Please also refer to the Master Responses provided under "Wastewater Treatment - On-site Treatment," "Wastewater Treatment - BARC East WWTP and Beaverdam Creek," "Perceived "Connected" Actions," and "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS.	Biological Resources Wastewater Treatment	Holly Simmons City of Greenbelt
342	83	039	Threatened species identified in the Environmental Condition of the Property (ECP) assessment not addressed in the DEIS. Lists of endangered species that may be present in Prince George's County were reviewed as part of the ECP assessment provided with the DEIS. Two threatened species were identified: The Northern long-eared bat (<i>Myotis septentrionalis</i> , also "NLEB") and Sensitive joint-vetch (<i>Aeschynomene virginica</i>). A bat study performed in December 2019 did not identify any NLEB onsite. Information submitted with the DEIS indicates that the USFWS does not have further requirements pertaining to NLEB; however, the DEIS includes no information or analysis of Sensitive joint-vetch.	Comment noted. Treasury consulted the USFWS's IPaC application for official site-specific T&E consultation information under Section 7 of the ESA. IPaC did not identify sensitive joint-vetch as potentially occurring at the Project Site. No change made to the FEIS.	Biological Resources	Holly Simmons City of Greenbelt
343	86	039	Treatment of the Northern Long-Eared Bat (NLEB). The DEIS states that the Proposed Action may affect the NLEB (a federally-threatened species). This level of significance is not identified in the associated Technical Memorandum. It appears that because the USFWS concurred with Treasury's determination that "any take that may occur under the Proposed Action would not be prohibited", the possible impact to NLEB has been discounted. This logic is flawed: The fact that an action is legally permissible does not mean that it will have no adverse impact. The City finds that an impact assessment of potentially significant adverse impact most appropriate. The determination of significance associated with possible impacts to NLEB must be reconsidered.	Comment noted. Section 3.8.2.2 of the FEIS states that no NLEBs were documented during site surveys, and no NLEB hibernaculum or maternity roosts are known to occur in Prince George's County. While the Proposed Action may affect the NLEB if it occurs on-site, the Proposed Action would not adversely affect recovery of this federally listed species (i.e., in accordance with the significance criteria established in the Biological Resources Technical Memorandum). Treasury further identified a recommended mitigation measure in Section 3.8.3 of the EIS to avoid tree removal during the NLEB pup season; this time period overlaps the migratory bird nesting season, which Treasury would avoid as an EPM. No change made to the FEIS.	Biological Resources	Holly Simmons City of Greenbelt
344	24	044	Biological Resources For wildlife, the selection of the ROI would benefit from consideration at multiple scales. For direct impacts to fauna such as noise and light, the ROI for biological resources (the Project Site and areas within 1,500 feet) seems logical. However, it would be more informative to consider effects to vegetation and habitat at both local and landscape scales.	Comment noted. Please refer to Response to Comment 330.	Biological Resources	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment

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345	26	044	Onsite, 63.6 acres of the habitat is characterized as meadows and scattered trees, but a more detailed assessment would be helpful. Section 1.2.3.2 of the technical report states that wildlife that favor forest edge habitats include species of birds and bats. However, forest edge habitat does not appear to be discussed further. We recommend the FEIS specifically address the habitat types and vegetation in relation to species that may use the site and ROI.	Comment noted. Please refer to Responses to Comments 324 and 329.	Biological Resources	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
346	27	044	We appreciate that bird collision deterrence options would be assessed during the building and design process and noise and light abatement or shielding features would be incorporated into the design of the proposed CPF.	Comment noted.	Biological Resources	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
347	28	044	Forest retention or reforestation areas are to be located outside of the construction LOD. Section 3.8.2. indicates that Treasury would revegetate the area disturbed during construction primarily with maintained lawn. As acknowledged, this approximately 47.3-acre area would have minimal habitat value. Instead, we recommend that Treasury propose reduction of impacts by revegetating much of this area with native species. While higher vegetation may present concerns for security, maintained meadow areas may provide clear sight lines and pleasing aesthetics along with habitat. For example, Treasury could work with USDA and other resource agencies to design appropriate vegetation and develop a management plan for meadow areas for songbirds and pollinators. Once established, dense native vegetation will aid in stormwater management and infiltration, and will likely reduce costs associated with grounds maintenance (e.g. reduced mowing, irrigation, fertilizer, etc.)	Comment noted. Section 3.8.3 of the FEIS was revised to include a recommended mitigation measure to develop the landscape design plan to revegetate Treasury's proposed parcel with native vegetation and micro-habitats (e.g., maintained meadows and additional reforestation) to maximize value to wildlife.	Biological Resources	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
348	30	044	The FEIS would benefit from a discussion of the potential for dispersal of invasive species during construction and landscape maintenance and avoidance or mitigation actions.	Comment noted. Section 3.8 of the FEIS was revised to note that the Proposed Action would have no impacts on invasive species. The entire construction LOD would be revegetated with native species according to Treasury's landscape plan. This landscape would be maintained throughout operation of the Proposed Action to prevent establishment of invasive species.	Biological Resources	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
349	2	046	2. This site is a natural habitat and sanctuary for wildlife which will significantly be impacts by a manufacturing type facility.	Comment noted.	Biological Resources	Albert Klein

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350	7	052	Section 3.8.2.2 of the EIS, under Wildlife, states that the construction of the Proposed Action would permanently remove approximately 83.6 acres of existing vegetated wildlife habitat within the project site. Line 1938-39 states this vegetated wildlife habitat contains numerous bird nest boxes that provide habitat for cavity-nesting bird species such as the eastern blue bird (<i>Sialia sialis</i>) and tree swallow (<i>Tachycineta bicolor</i>). Line 2006-07 states that Treasury would coordinate with owners of the on-site bird nest boxes to have them relocated from the Project Site prior to construction but does not name any specific locations. What areas or regions will the on-site bird nests be relocated to? The relocation of nests should highly consider the noise levels of construction displayed in Figure 3.5-1 as birds may not settle within areas with too high of noise pollution.	Comment noted. Relocation of the bird nest boxes would be determined by their owners. No change made to the FEIS.	Biological Resources	Kobe Ramirez c/o Julian Grauer Environmental Review, Inc.
351	10	054	The DEIS states the BARC campus is a resting point for migratory birds along the East Coast of the United States, including some endangered species. The wildlife inventory does not include any permanent endangered species. Since protection of the migrating wildlife is important and this was a concern raised by several members of a local ornithological group during the public meeting on December 2, 2020, we would appreciate if Treasury could provide additional detail in the DEIS describing how this facility will mitigate wildlife impacts.	Comment noted. Please refer to Response to Comment 336.	Biological Resources	Carlton Hart NCPC
PM-2	1	032	But for now, I'm not representing any organization. I'm just speaking on my own behalf. And I've been using the site for over 20 years for watching wildlife, bird watching, and that sort of thing in the public areas and also participating in some of the wildlife research that's been done in the last four to five years, specifically the birds. But that's just as an individual. There is a huge amount of wildlife that is, you know, mostly locally important based on the habitat values that are there, and there's a lot of resources that I think should have been covered in your draft document. The amount of information is grossly inadequate in terms of the Biological Resources section, and the impacted environmental and the environmental consequences, the analysis.	Comment noted.	Biological Resources	Jeff Shenot
PM-15	2	107	And so I would just refer back to Jeff Shenot's comment and just repeat that it's surprising how the wildlife portion is just dismissed. And when I look at the footprint of this project, it's just amazing how it's basically the whole area is wiped out and put into impermeable surfaces, which doesn't make any sense given how close it is to the cleanest creek in all of PG County, which is Beaverdam Creek, which is where the effluent would, which is where the water drains into. So that just doesn't make any sense to me, and I'll be taking a closer look at the Environmental Impact Statement and commenting on that.	Comment noted. Please refer to the Master Responses provided under "Wastewater Treatment - On-site Treatment," "Wastewater Treatment - BARC East WWTP and Beaverdam Creek," and "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS.	Biological Resources Wastewater Treatment	Michel Cavigelli and Martha Tomecek BARC

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Section 3.8 - Biological Resources - Potential Impacts to Bald Eagles							
352	1	001	I have read the EIS and I disagree with the statement that there are no eagles living near the proposed facility. To the contrary there is a large eagle nest on Research road which is within about one quarter mile of the proposed facility. The eagle nest has been occupied for at least thirty years if not many more. Eagles live and fledge their young most every Spring. There are also many eagles living at the Patuxent Wildlife Center, which is close and contiguous to the proposed facility. It's hard enough for an eagle to survive in the current environment, let alone in an environment with a huge manufacturing facility that operates 24 hours a day! A manufacturing facility is not suitable to an area designated residential on land set aside for research purposes.	Please refer to the Master Response provided under "Potential Impacts to Bald Eagles" in Section 9.0 of the FEIS.	Biological Resources Bald Eagles	Mary Ann Canter	
353	1	018	My comments concern a bald eagle nest located to the east of Research Road at position: 39.02415 - 76.87600. I and others have observed bald eagles nesting and breeding there for about 15 years. The location is about 3000 feet from the intersection of Powder Mill Rd. and Poultry Road, which is the BEP facility's proposed site.	Please refer to the Master Response provided under "Potential Impacts to Bald Eagles" in Section 9.0 of the FEIS.	Biological Resources Bald Eagles	Al Burgoon	BARCBird
354	3	018	Woodie Martin of National Wildlife Service banded eaglets on several occasions about 2013-2015. The bald eagles have bred successfully in most years during that time span. We saw eagles at almost every meeting of BARCBird. The eagles feed on fish, turtles, and other birds. They would range over large areas, including the proposed location of the new BEP Facility. We would observe them flying and perching over the sewage pond and open fields to the west of the nest site. There is also a great blue heron rookery about 1000 ft. further east of the eagle nest. The area to which I refer is a National Research Forest. I worked at the Beltsville Agricultural Research Station in Building 306 and National Agricultural Library from 1981 off and on until 2006 when I retired.	Please refer to the Master Response provided under "Potential Impacts to Bald Eagles" in Section 9.0 of the FEIS.	Biological Resources Bald Eagles	Al Burgoon	BARCBird
355	7	025	Omissions in Biological Resources Discussion on Bald Eagles The DEIS states that there is "one special status species, the bald eagle, is not subject to further analysis as no suitable habitat for this species is present within the region of influence." In addition, the biological resources technical memorandum states that the closest bald eagle's nest is located approximately 0.6 mile to the south of the project site. The eagles have resided there for about 15 years. While bald and golden eagles (and their nests) are no longer federally listed as endangered (since 2007) or listed by the state of Maryland (since 2010), they are protected under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act (Eagle Act). Both laws prohibit "take" and possession of eagles, their parts, nests, and eggs. Both acts prohibit intentional injury, harassment, and death. Under the Eagle Act, "take" also includes disturbance and unintentional (incidental) take. According to the U.S. Fish and Wildlife Service (FWS), disturbance includes immediate impacts, such as loud noises around the nest that may cause eagles to abandon their eggs or young chicks. Disturbance may also happen if humans change the landscape around the eagle nest.	Please refer to the Master Response provided under "Potential Impacts to Bald Eagles" in Section 9.0 of the FEIS.	Biological Resources Bald Eagles	Kiki Theodoropoulos	

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356	8	025	<p>According to FWS, bald eagles stay on their territory (roughly 1 to 6 square miles) year-round. Therefore, the proposed facility is part of the eagles’ foraging area. However, BEP did not do additional analysis and excluded eagles from its discussion of biological resources even though the construction of the proposed facility would likely disrupt their foraging area. For example, the filling in of wetlands on the proposed project site, the diversion or fill of two streams, and the removal of 3.6 acres of forest would presumably affect the eagles’ foraging area. The May 2007 FWS National Bald Eagle Management Guidelines state that disruption, destruction, or obstruction of roosting and foraging areas can negatively affect bald eagles. Disruptive activities in or near eagle foraging areas can interfere with feeding, reducing chances of survival. The FWS guidelines state that during the breeding season, bald eagles are sensitive to a variety of human activities. The FWS guidelines provide recommendations to mitigate activities that have temporary impacts, such as the use of loud machinery, fireworks displays, or summer boating activities, recommending seasonal restrictions. These types of activities can generally be carried out outside of the breeding season without causing disturbance. If there is construction of a 1 or 2 story building, with project footprint of more than half an acre closer than 1 mile from an eagle’s nest and can be seen from the nest, as in the case of the proposed facility, the FWS guidelines recommend the installation of landscape buffers. BEP has an opportunity to include in the Final EIS at least some discussion of the effects of its planned actions on the foraging areas of eagles nesting within 0.6 mile of the proposed facility. More importantly, BEP still has time to make some modifications in its plans that may help mitigate the potential adverse impacts of construction on the existence of the eagles consistent with FWS guidance.</p>	Please refer to the Master Response provided under "Potential Impacts to Bald Eagles" in Section 9.0 of the FEIS.	Biological Resources Bald Eagles	Kiki Theodoropoulos	
357	1	030	<p>The site for the proposed mint is the home of several bald eagles, which are protected from disturbance by the Migratory Bird Act of 1918 https://www.fws.gov/laws/lawsdigest/migtrea.html and The Eagle Act, https://www.fws.gov/midwest/eagle/history/protections.html#bgepa. Both of these laws forbid activities that would impair the birds’ "ability to forage, nest, roost, breed or raise young." The Environmental Impact Statement addresses the issue of protecting the eagles in the following manner: Construction: Less-than-significant adverse impact on forest resources and vegetation from the conversion of vegetated land to developed land; less-than-significant adverse impacts on wildlife from habitat loss and displacement; “may affect” determination for the federally threatened NLEB; no effect on any other federal- or state- listed special status species; less-than-significant adverse impact on migratory birds. Operation: Negligible adverse impacts to vegetation; less- than-significant adverse impacts on wildlife from changes in ambient noise and light levels; no effect on federal- or state-listed special status species; less-than-significant adverse impact on migratory birds from an increase in ambient noise and light levels and the potential for window strikes. (E-5)</p>	Please refer to the Master Response provided under "Potential Impacts to Bald Eagles" in Section 9.0 of the FEIS.	Biological Resources Bald Eagles	Vickie Fang	

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358	2	030	No further explanation is given as to how the eagles will be protected from the construction and operation of a large industrial plant that operates 24 hours a day, when address the issues outlined in the National Eagle Management Guideline. https://www.fws.gov/northeast/ecologicalservices/eaglenationalguide.html should be addressed to ensure the safety of the protected birds who nest on the property. Specifically, the statement is deficient in the following ways: I. The area for the proposed construction is an open field will no visual barriers between the nests and the proposed factory. Nothing has been proposed to block the sight of the plant and its construction from the bird's view, despite the fact that the sight of the human activity is one of the key ways in which the eagles' ability to nest, breed, and raise young is disturbed. Two factors most influence an eagle's response to human activity: 1. The activity's visibility from the eagle nest and; 2. The regular occurrence of similar activities near the nest. (National Eagle Management Guidelines, USFWS) Bald eagles fear humans at all times, but will tolerate much less disturbance during the nesting season, than at other times of the year. A nesting pair will seek isolation, and any human interference, if prolonged, may drive the birds away from the nest. (Eagle Nature Foundation) http://eaglenature.com/eagle_facts.php The proposed industrial plant would not only impose the sights (and sounds) of human activity on the birds, it would do so 24 per hours a day, every day.	Please refer to the Master Response provided under "Potential Impacts to Bald Eagles" in Section 9.0 of the FEIS.	Biological Resources Bald Eagles	Vickie Fang	
359	3	030	II. There is nothing in the EIS which allows for the cessation of activities during periods of particular sensitivity for the eagles. Particular care must be taken during certain phases of the eagles' life as outlined by the US Fish & Wildlife Service. https://www.fws.gov/midwest/eagle/Nhistory/NestChron.html#nesting	Please refer to the Master Response provided under "Potential Impacts to Bald Eagles" in Section 9.0 of the FEIS.	Biological Resources Bald Eagles	Vickie Fang	
360	4	030	III. Fish is the primary food of bald eagles. https://www.nationaleaglecenter.org/eagle-diet-feeding/ There is only the statement that the runoff of heavy metals, including nickel and arsenic, into the creek will be adequately treated, but the issue of whether these heavy metals will affect the marine life on which the eagles prey has not been addressed.	Please refer to the Master Responses provided under "Wastewater Treatment - On-site Treatment" and "Potential Impacts to Bald Eagles" in Section 9.0 of the FEIS.	Biological Resources Bald Eagles	Vickie Fang	
361	6	030	Lack of Transparency I. How protected and endangered species and species of concern will be accommodated. E-10 states as follows: the US Army Corps of Engineers, Baltimore District 219 (USACE) is acting as the federal contracting agency and is conducting site-specific studies to ensure 220 compliance with other environmental laws, including Sections 401 and 404 of the federal Clean Water Act, 221 Section 7 of the federal Endangered Species Act, and the Maryland Forest Conservation Act. However, the actual effects of the construction appear to have been studied on only a single species of bat. As other comments have explained, the bald eagles nesting at the site are protected by law, and we can find nothing in this report which addresses the many harmful effects that this construction is likely to have on the birds.	Please refer to the Master Response provided under "Potential Impacts to Bald Eagles" in Section 9.0 of the FEIS.	Biological Resources Bald Eagles	Vickie Fang, Butch Norden, Beth Norden	

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362	3	001	Having read the woefully inadequate EIS for the proposed BEP facility, I think it is imperative that a complete assessment be completed by the Fish and Wildlife Service of the effects this building and its construction would have upon the eagles that live close to Research Rd. on the BARC Campus. This eagles nest is an integral part of the Greenbelt Community. It is visited daily in season by multiple groups and individuals from the nearby Greenbelt Homes and by bird watchers from throughout the region. Should anything happen to them there would be outcry from many and varied interested persons.	Please refer to the Master Response provided under "Potential Impacts to Bald Eagles" in Section 9.0 of the FEIS.	Biological Resources Bald Eagles	Mary Ann Canter	
363	4	001	Your EIS dismissed the eagles as irrelevant, however their large nest has been occupied by adults and eagles every year within .6 miles of mainly open land. Open land is not foraging land and so the .5 mi requisite distance should be expanded to include foraging space between their nest and the proposed facility. This can only be determined by a professional raptor specialist. It is a wonder that these symbols of our nation live so close to highly developed areas and as such they may need not only safe space to forage but also specialized support to continue to live. Information about mitigation and support strategies is needed and should be included in the assessment.	Please refer to the Master Response provided under "Potential Impacts to Bald Eagles" in Section 9.0 of the FEIS.	Biological Resources Bald Eagles	Mary Ann Canter	
Section 3.8 - Biological Resources - Potential Impacts to Migratory Birds							
364	2	014	The bird nesting season was considered with regard to land clearing and construction. This should apply also to building demolition (i.e., do with care, and outside the nesting season), since some birds likely nest or roost within buildings with open doors or windows or with holes in the roof. Note that even vultures are protected by the Migratory Bird Treaty Act, and they do provide a service, by cleaning up road-killed animals, which likely will be more common with more vehicles on Powder Mill Road.	Please refer to the Master Response provided under "Potential Impacts to Migratory Birds" in Section 9.0 of the FEIS.	Biological Resources Migratory Birds	Deanna Dawson	
365	2	018	We have a club called BARCBird, which met monthly to go birding over that period. We started collecting data on the actual birds in 2011 (see the excel file attached). Meetings have been suspended during Covid. BARCBird is composed of BARC employees and a few other bird enthusiasts.	Please refer to the Master Response provided under "Potential Impacts to Migratory Birds" in Section 9.0 of the FEIS.	Biological Resources Migratory Birds	Al Burgoon	BARCBird
366	3	027	The area around the proposed site is a prime nesting spot for certain bird species, and BARC has been studying some of these for many decades. The loss of undeveloped land with the construction of one million square feet of new development will have a negative impact on these bird species. Further study is needed to evaluate these impacts and to recommend minimization practices that can be implemented.	Please refer to the Master Response provided under "Potential Impacts to Migratory Birds" in Section 9.0 of the FEIS.	Biological Resources Migratory Birds	Philip S. Aronson	

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367	1	028	<p>The Maryland Ornithological Society (MOS) appreciates the opportunity for comment on the Environmental Impact Statement (EIS) for the Bureau of Engraving and Printing (BEP) Project. MOS favors the No Action Alternative. Aside from the loss of circa 100 acres of habitat, there will undoubtedly be considerable additional harm to birds due to habitat fragmentation and disturbance, and water quality issues.</p> <p>MOS's primary concern is the paucity of data used, and the inadequacy of the EIS, in regards to the project's impacts on birds and bird habitat. For example, the EIS states that US Fish and Wildlife Service identified 12 bird migrant species with the potential to occur onsite and only 8 have actually been reported from the Region of Influence (ROI) (Pages 3-37). It is unclear where these figures originate, but they are grossly inaccurate. According to publicly available information, 170 bird species have been recorded at or adjacent to the project site (see below). MOS members have been studying and documenting the bird populations of Beltsville Agricultural Research Center for many years, and there is a wealth of data for the site. For example, a formal survey of the Beltsville Agricultural Research Center (BARC) site has been ongoing for five years now. In addition, there have been two previous Maryland Breeding Bird Atlas (BBA) 5-year projects at the site, the first dating from the 1980s. A third BBA is in its first year. Furthermore, BARC is surveyed during the MOS Fall and May Counts, and is also part of the Bowie Christmas Bird Count. All of these data are readily available on eBird, an online database maintained by the Cornell University Laboratory of Ornithology or in the Christmas Bird Count data reports (available from National Audubon).</p>	Please refer to the Master Response provided under "Potential Impacts to Migratory Birds" in Section 9.0 of the FEIS.	Biological Resources Migratory Birds	Kurt R. Schwarz MD Ornithological Society
368	2	028	<p>As you may be aware, a recent study has shown that North America has lost 3 billion birds, 29% of its total population, since the 1970s.[1] The decline is even more marked among grassland species, which are down 53% as of 2019.[2] The BARC site provides habitat for some of these grassland species, as well as early successional habitat and forest habitat. Many of these species are also considered by the Maryland Department of Natural Resources to be Species of Greatest Conservation Need (SGCN), including American Kestrel, Blue-winged Warbler, Eastern Meadowlark, Prairie Warbler, Red-headed Woodpecker, Savannah Sparrow, Vesper Sparrow, and Yellow-breasted Chat.[3]</p> <p>The data sources cited above show that 170 species of birds have been recorded from the Poultry Road area and the two closest adjacent areas, North Dairy and Zoology/Entomology Roads, all of which would be impacted by the proposed facility (Table 1). These include breeding resident species as well as neotropical and boreal migrants, including 23 species of wood warblers. All of the SGCN species noted above, save Blue-winged Warbler, have been recorded and some found to breed there. For example, Red-headed Woodpeckers have bred in the old oaks that would be removed during construction. American Kestrel, a rapidly declining species, finds BARC one of its few strongholds with a number of successful nesting pairs. The EIS also gives the inaccurate impression that migratory birds are mere transients in the ROI, but many of the migrants stay to breed and produce more offspring. The woods just east of the proposed construction hosts several species of breeding warblers, as well as thrushes, vireos, and tanagers. The fields and brushy areas support breeding Savannah Sparrows and Eastern Meadowlarks in summer, as well as wintering species such as American Pipit.</p>	Please refer to the Master Response provided under "Potential Impacts to Migratory Birds" in Section 9.0 of the FEIS.	Biological Resources Migratory Birds	Kurt R. Schwarz MD Ornithological Society

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369	7	030	The report further states: 210. Migratory birds use BARC, including the Project Site, as seasonal feeding ground, breeding ground, or for 1958 temporary stop-over during migration (USFWS, 2020a). The USFWS identifies 12 migratory birds with the 1959 potential to occur on the Project Site; these birds are also designated as Birds of Conservation Concern Proposed Currency Production Facility November 6, 2020 3-37 DEIS 1960 (BCCs18) (USFWS, 2020b). All 12 migratory birds have been observed on BARC, although only eight have 1961 been specifically reported within the ROI (Cornell Lab of Ornithology, 2020). We can find nothing on how the construction will affect these migrating birds or even what those birds are. Furthermore, we are only told the Army Corp of Engineers is conducting studies. We do not have information as to the credentials of the ornithologists conducting the studies. In order to satisfy the requirements of an impact statement, we must have the name of the person or group performing the study and the actual data produced by those studies.	Please refer to the Master Response provided under "Potential Impacts to Migratory Birds" in Section 9.0 of the FEIS.	Biological Resources Migratory Birds	Vickie Fang, Butch Norden, Beth Norden
370	7	032	2) Migratory Birds (lines 2037-2048)"Construction of the Proposed Action could impact migratory birds in the ROI from site disturbance, particularly if construction would occur between May and September. However, most birds would likely avoid the Project Site or relocate to nearby habitat areas on BARC, in the ROI, or regionally. Therefore, construction of the Preferred Alternative would result in less-than-significant adverse impacts on migratory birds with implementation of EPMs and RCMs identified in Section 2.2.4.Potential impacts on migratory birds from operation of the Proposed Action would be like those described above for wildlife. Additionally, there could be occasional migratory bird mortality resulting from window strikes; however, the proposed CPF's windows would comprise a small percentage of the overall building surface area. Bird collision deterrence options would be assessed during the building and design process using the LEED framework and implemented as appropriate. Overall, operational activities would have less-than-significant adverse impacts on migratory birds."	Comment noted.	Biological Resources Migratory Birds	Jeff Shenot
371	9	032	The Migratory Birds section misleads and misinforms readers. It says FWS identified 12 bird species (but does not identify which) with the potential to occur onsite, and says only 8 have actually been reported from the ROI. Let that sink in.... It cites FWS ' landmark report (2008 BCC) to identify birds of concern, which I assume this means the 12 referred to are listed by the report. This is misleading to the reader since the Draft EIS doesn't explain the context of that report. More importantly, I know there are close to 200 species of birds that have been documented BARC approximately in the last decade, and this information is readily available from public sources yet it is not provided in this document. I am certain the Maryland Ornithological Society and local Audubon chapters can provide Treasury with additional site-specific bird resource data upon request.	Please refer to the Master Response provided under "Potential Impacts to Migratory Birds" in Section 9.0 of the FEIS.	Biological Resources Migratory Birds	Jeff Shenot

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372	1	036	Dr. Lawrence Zeleny, retired BARC scientist, placed his trail's first bluebird box in 1965 right outside his office. Then every week from March to September he would faithfully examine 60 boxes along a 10 mile meandering route. Thirteen years later, in 1978, Larry founded the North American Bluebird Society, an education, conservation, and research organization whose purpose was to promote the preservation of cavity nesting species that were in decline. Now, there are thousands of members who build boxes, teach scouting groups how to build boxes and care for birds and habitat. Dr. Zeleny's nest box trail, featured in National Geographic, may well be the longest running, continuously monitored trail in the country. It's historic and it's on the BARC property. Three of us took over the trail from him shortly before his death 25 years ago. It has tripled in size, and the area of Poultry Research Road, then and now, has, by far, been the most successful site on the 7,000 acre BARC property. It is ideal bird habitat, park-like grassland, dotted with trees, ideal forest edge. Hawks, owls, deer, flying squirrels, rabbits, and songbirds thrive here. Our 20 nest boxes never have a vacancy. It is here where our personal research allowed us to determine the ideal nest box for forever hotter summers. After 24 years, in 2019, our research enabled us to create a climbing predator guard that has stopped 100% of climbing predators like raccoons and snakes without harming anything. This has never been done consistently. Poultry Research Road is a fantastic research site for us. In 2019, on this road alone, we produced 99 new bluebirds and 38 new tree swallows, a record for us. The young were well fed and continued to stay after leaving the nest because the insect population is so numerous here. In a recent study of the cavity nesting Carolina Chickadee, it was determined that 5,000 insects were consumed per clutch of hatchlings. This year, 2020, we fledged over 100 birds again in 27 nest attempts. That is a lot of insects consumed. That's because Poultry Research Road is ideal habitat for birds and insects.	Comment noted.	Biological Resources Migratory Birds	Marcia and Robert Van Horn
373	84	039	DEIS does not appear to utilize all possible resources to identify species onsite. Comments from the December 2, 2020, public DEIS webinar indicate that bird surveys have been performed by BARC staff and local volunteers. These could prove a useful resource to provide a baseline for analysis. Treasury should contact BARC staff running the bird surveys for assistance in further analysis. Revisions to impact determinations may be necessary.	Please refer to the Master Response provided under "Potential Impacts to Migratory Birds" in Section 9.0 of the FEIS.	Biological Resources Migratory Birds	Holly Simmons City of Greenbelt
374	25	044	We recommend that the assessment of biological resources be expanded, using more detailed data to assess and support the determination of significance and to identify appropriate minimization or mitigation measures. Specifically, we recommend that the analysis include more detail on impacts to bird species and the existing habitat onsite. Although access is restricted, BARC is clearly of interest to birders in the region. The DEIS indicates that 12 species of Birds of Conservation Concern have been observed, with 8 being reported within the ROI. There is an eBird hotspot at BARC, and 239 species have been reported to date. The Birders Guide to Maryland and D.C. includes BARC, and states that during the several annual opportunities when special permission is given to bird (the Audubon Christmas Bird Count and the Maryland Ornithological Society's Spring and Fall Counts), BARC "is highly prized" and "a highly desirable territory."	Please refer to the Master Response provided under "Potential Impacts to Migratory Birds" in Section 9.0 of the FEIS.	Biological Resources Migratory Birds	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment

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375	4	048	The Public Comments at the December 2, 2020 meeting highlighted errors in accuracy of data in the areas of wildlife. The Draft EIS noted minimal bird species in the area yet the Greenbelt Ornithological group has counted 238 diverse species on the property. A review of the associated appendices did not provide sufficient details on the methodology, collection periods, and analysis.	Please refer to the Master Response provided under "Potential Impacts to Migratory Birds" in Section 9.0 of the FEIS.	Biological Resources Migratory Birds	Thomas E. Dernoga c/o Michelle Garcia	Prince George's County Council
376	16	048	Environmental – Bird Studies. An analysis published in the journal “Science” (September 2019) documented a decline of birds in the United States by 29% over the past half-century, a catastrophic loss to ecosystems. A key issue is habitat loss. The area around the proposed site is a prime nesting area for particular bird species. Studies of some of these species have been ongoing for three decades or more and have identified more than 238 species using the proposed area. The Draft EIS found only 12 species. The Draft EIS data and its analysis need to be fully reviewed and updated to reflect or explain the differences between these studies and the findings in the Draft EIS. The potential impact of further building and removal of undeveloped land must be evaluated, and minimization practices must be implemented.	Please refer to the Master Response provided under "Potential Impacts to Migratory Birds" in Section 9.0 of the FEIS.	Biological Resources Migratory Birds	Thomas E. Dernoga c/o Michelle Garcia	Prince George's County Council
377	3	050	Chapter 3 of the draft EIS is also severely lacking. Several other commenters, including the Maryland Ornithological Society, have commented on the abundant bird life documented at the BARC site, including the parcel(s) specifically under prospect for the CPF. This area is a savannah habitat that is quite unique in the region. The landscape on the 11000-acre BARC represent a diverse mosaic of vegetation and habitat types. The biological resource section is woefully inadequate. As mentioned, other commenters have submitted data for well over 100 bird species that have been documented on the site. This greatly contradicts the "12" species of migratory birds mentioned on line 1958 of the draft EIS. Other than citing USFWS and MD Natural Heritage Program data for listed species, there is no mention or description of any methodologies or surveys conducted to inventory the biological diversity on the site.	Please refer to the Master Response provided under "Potential Impacts to Migratory Birds" in Section 9.0 of the FEIS.	Biological Resources Migratory Birds	Ross Geredien	
PM-14	1	107	We are both BARC employees, and we are both Greenbelt residents. And as a BARC employee, one of my duties is to chair what is called the Ecology Committee. And one of our projects is to have volunteer bird watchers access this site to be able to meet the federal requirement that we know what kind of biological diversity is on the site. And so we have basically been able to have volunteers meet this requirement for us by allowing them access to the site. And from that project, we know that there are at least 238 species of birds found at the BARC site, which is basically a hot spot in PG County. The site where the BEP is projected to be is a unique environment in that it's kind of a savannah. So there are certainly species that are there that are not elsewhere on this site. We know that it is a very good spot for woodpeckers, hawks. There's been a painted bunting out there seen. So it's attracted rare species, and so it's a pretty unique site.	Please refer to the Master Response provided under "Potential Impacts to Migratory Birds" in Section 9.0 of the FEIS.	Biological Resources Migratory Birds	Michel Cavigelli and Martha Tomecek	BARC

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PM-16	1	50	So as a resident of College Park, and I'm also a volunteer surveyor for the aforementioned biodiversity and avian surveys at the park, I have some significant concerns about the habitat loss and also some of the data and information that seem to be informing the EIS. In particular, of note, the number of 12 species of migratory birds is, as Michel previously mentioned, highly inaccurate.	Please refer to the Master Response provided under "Potential Impacts to Migratory Birds" in Section 9.0 of the FEIS.	Biological Resources Migratory Birds	Ross Geredien
Section 3.9 - Cultural Resources						
378	1	005	Thank you for including the Advisory Council on Historic Preservation (ACHP) on the US Department of the Treasury's, Bureau of Engraving and Printing (BEP), notice for the Draft Environmental Impact Statement (EIS) for the proposed Replacement Currency Production Facility at the Beltsville Agricultural Research Center in Prince George's County, Maryland. It is our understanding that BEP is the lead-agency for this undertaking with the Agricultural Research Service (ARS) also participating and that the US Army Corps of Engineers (USACE), Baltimore District, is acting as a federal contracting agency. Should the BEP, as part of its responsibilities under Section 106 of the National Historic Preservation Act (NHPA) and the regulations of the ACHP, "Protection of Historic Properties" (36 CFR Part 800), reach a determination of adverse effect, in consultation with the Maryland and Washington D.C. SHPOs, tribes, and other consulting parties, please invite the ACHP to participate at that time, pursuant 36CFR800.6(a)(1). The ACHP recommends BEP utilize our Electronic Section 106 Documentation Submittal System (e106) to notify us formally of an adverse effect finding. All the information can be found on our site at: https://www.achp.gov/e106-email-form . Additionally, Mr. Chris Wilson, is the Office of Federal Agency Programs Program Analyst assigned to BEP and Ms. Alexis Clark, the Historic Preservation Specialist assigned to ARS. Please include them on any future communication.	Comment noted. Treasury will continue to consult with the ACHP through the NHPA Section 106 process. No change made to the FEIS.	Cultural Resources Agency Roles and Responsibilities	Christopher Daniel ACHP
379	1	023	The Bureau of Engraving and Printing and the Corps of Engineers are continuing consultation with the Maryland Historical Trust and other consulting parties to complete the project's historic preservation review pursuant to Section 106 of the National Historic Preservation Act and resolve the undertaking's adverse effects on historic properties and negotiate a Memorandum of Agreement, prior to finalizing the EIS.	Comment noted.	Cultural Resources Agency Roles and Responsibilities	c/o Sylvia Mosser MHT
380	11	030	II. Paleontological Concerns The proposed site for the mint is also a recognized site of significant dinosaur fossil discovery. No provision has been made for what will be done when construction unearths dinosaur or other fossils. This report lacks the name of a paleontologist who will be on site for the dig, and it lacks an explanation for how fossils will be handled.	Comment noted. There is one known paleontological site on BARC, but the USDA has no knowledge of paleontological sites within the Project Site. Phase I and Phase II archaeology surveys did not identify any fossils on-site and indicated the Project Site does not have a high probability of paleontological deposits. Additionally, the site has been disturbed in the past from farming and construction of the Poultry Road research facilities. Section 3.9.1.3 of the FEIS was revised to include this information. Additionally, Table 2.2-1 of the FEIS was revised to clarify that the Unanticipated Discovery Plan, proposed as an EPM, would account for potential paleontological discoveries.	Cultural Resources	Vickie Fang, Butch Norden, Beth Norden

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381	1	033	Cultural resources	Comment noted.	Cultural Resources	Msabah Sange	
382	36	039	VIII. Historic Buildings and Structures The DEIS evaluates impact to both physical effects (impacts to architectural resources within the project site itself, where building and structures could be physically impacted) and visual effects (impacts to the viewshed in which the project site is located). The City offers the following comment on the DEIS's evaluation of historic buildings and structures:	Comment noted.	Cultural Resources	Holly Simmons	City of Greenbelt
383	37	039	The City believes the Proposed Action would have a significant adverse effect on the ROI for physical effects to architectural history. Under the Proposed Action, 23 buildings and structures that contribute to the BARC Historic District would be demolished. As the DEIS notes, the Proposed Action would result in "diminished integrity of the BARC Historic District's design, setting, materials, workmanship, and feeling." Despite this, the DEIS claims that the Proposed Action, including EMPs, RCMs, and BMPs, would have a less-than-significant adverse impact on the architectural history ROI for physical effects. The historic structures onsite are non-renewable. The significant adverse effect of the Build Alternative on the BARC Historic District and the individual contributing resources must be acknowledged.	Comment noted. As part of the Proposed Action, Treasury would execute and implement a project-specific MOA or PA with the MHT and other Section 106 consulting parties to avoid, minimize, or mitigate the adverse effects on historic properties (see Table 2.2-1 of the FEIS). This would reduce potential adverse impacts to less-than-significant levels. No change made to the FEIS.	Cultural Resources	Holly Simmons	City of Greenbelt
384	38	039	ROI for physical effects to architectural history must clearly include individual contributing resources to allow for an accurate assessment of impact to resources. The City notes an inconsistency in the definition of the ROI for physical effects to architectural history and the impact assessment. The DEIS defines this ROI as "the Project Site (i.e., where buildings and structures could be physically affected)", but later states that there is only "one architectural resource (i.e., the BARC Historic District) in the architectural history APE [ROI] for physical effects." The ROI for physical effects to historic resources must include all historic buildings and structures onsite, and the impact on these resources (i.e., their demolition) must be clearly addressed in the impact assessment.	Comment noted. The BARC Historic District is the only historic property potentially affected by the Proposed Action. The historic buildings and structures in the APEs for physical effects and visual effects are contributing resources to the BARC Historic District. Section 3.9.2.2 of the FEIS was revised to refer to "the one historic property (i.e., the BARC Historic District) in the architectural history APE for physical effects."	Cultural Resources	Holly Simmons	City of Greenbelt
385	39	039	Discrepancy between DEIS significance assessment and documented significance and integrity of structures. In terms of physical effects, the DEIS states that the No Build Alternative would result in a significant adverse impact on the BARC Historic District in the identified ROI "due to neglect and deterioration". This assessment is especially concerning, considering the DEIS claims that the Build Alternative would result in a less-than-significant adverse impact on the BARC Historic District. This assessment that the No Build Alternative would have a greater impact than the Build Alternative lacks justification, and is inconsistent with evidence provided. While the majority of the historic buildings and structures onsite are vacant, the significance of these buildings and structures within BARC under NRHP Criteria A and C is well-documented in Maryland Inventory of Historic Places (MIHP) Determination of Eligibility (DOE) forms. Many of the structures are identified as retaining integrity, and a fair portion are identified as being in good condition. Additionally, the No Build alternative does not preclude future opportunities to address the current condition of historic buildings and structures. The DEIS would benefit from further discussion and a reconsideration of this assessment.	Comment noted. The Architectural History impact determination for the No Action Alternative (see Section 3.9.2.1 of the FEIS) was revised from "significant adverse" to "less-than-significant adverse." The analysis was further revised to note that the USDA would be responsible for managing the existing historic resources on-site and complying with the NHPA. Please also refer to Response to Comment 383.	Cultural Resources	Holly Simmons	City of Greenbelt

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386	41	039	M-NCPPC concerns must be addressed. During the DEIS public webinar held on December 2, 2020, M-NCPPC expressed concerns regarding impacts to the view from Walnut Grange, a Prince George’s County Historic Site. These concerns should be addressed in the DEIS.	Comment noted. Please refer to Response to Comment PM-11.	Cultural Resources	Holly Simmons City of Greenbelt
387	42	039	The City concurs with the DEIS’s assessment that the Preferred Alternative would have a significant adverse impact on the visual environment: “By introducing the proposed CPF into the previously cohesive landscape, the Preferred Alternative would also obstruct vistas and 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.” The cohesive landscape is part of the justification for the BARC Historic District’s eligibility for listing in the NRHP. As stated in the 1997/98 MHT Internal NR-Eligibility Review Form for BARC, “Because the mission of the BARC facility has remained constant over the years, the landscape also reflects a high level of integrity.” Introduction of the replacement CPF into this cohesive landscape would have a significant adverse impact. The Preferred Alternative should not be implemented.	Comment noted. Please refer to Response to Comment 383. Additionally, Sections 3.9.3 and 3.3.3 of the FEIS contain recommended mitigation measures that would further reduce adverse visual impacts. No change made to the FEIS.	Cultural Resources	Holly Simmons City of Greenbelt
388	31	044	Cultural Resources The Project Site is located within the BARC Historic District. Demolition of the 22 contributing resources and construction of the proposed CPF, would result in diminished integrity of the BARC Historic District’s design, setting, materials, workmanship, and feeling. It is our understanding that consultation with Maryland Historic Trust is ongoing to reduce these adverse effects to less-than-significant levels. We recommend that the FEIS be updated regarding consultation and include the draft or final Memorandum of Agreement (MOA) or Programmatic Agreement (PA).	Comment noted. The MOA can be found online at the following link: https://www.nab.usace.army.mil/Portals/63/docs/BEP/FEIS/Section_106_MOA.pdf . Please refer to Section 1.2.2 and Appendix A of the Cultural Resources Technical Memorandum for a record of consultation with consulting parties.	Cultural Resources	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
389	10	048	In addition, there is no mention of the impact of the changes to the view to historical building views on the grounds. The impact on these historical building views needs to be assessed.	Comment noted. Visual impacts to historical buildings are discussed in Section 3.9 of the FEIS. No change made to the FEIS.	Cultural Resources	Thomas E. Dernoga c/o Michelle Garcia Prince George’s County Council
390	7	054	Historic Preservation The DEIS describes the historic resources included on this campus and how the development of this new facility might affect them. The existing historic buildings on this part of BARC are contributing elements of the BARC historic district, but as they have been abandoned since the mid-1990s, they are in disrepair. These buildings have been marked for demolition. In addition, there are viewshed impacts from existing nearby historic resources within the BARC historic district. We understand that Treasury is developing a Memorandum of Agreement (MOA) pursuant to Section 106 of the National Historic Preservation Act to address the physical and visual impacts to historic resources.	Comment noted. Please refer to Response to Comment 388.	Cultural Resources	Carlton Hart NCPC

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391	8	054	As NCPC’s review of the project is not considered an undertaking for Section 106 purposes, we are not a signatory in the MOA. Given the poor condition of the existing historic buildings and inability for reuse as described in the DEIS, we would recommend Treasury explore the following mitigation in the MOA: update the historic documentation for the contributing buildings, include interpretive panels for the on-site employee trail, and/or add interpretation inside the building to be used for public visitors to the building.	Comment noted. Treasury will consider these mitigation options in the Section 106 process. No change made to the FEIS.	Cultural Resources	Carlton Hart	NCPC
PM-8	1	104	The No Action Alternative, I'm not understanding how there could be cultural resources adverse impact by not doing anything. You mentioned something about the buildings themselves. But it seems to me if you just tore down the buildings that are a problem, you don't have to deal with the Bureau of Engraving and Printing building to fix that.	Comment noted. Please refer to Response to Comment 385.	Cultural Resources	Michael Hartman	
PM-11	1	106	Walnut Grange is a county historic (inaudible), so we'd kind of be concerned about the viewshed from Walnut Grange to the proposed construction. So it would be helpful to have a viewshed study.	Comment noted. Walnut Grange is identified in the Cultural Resources Technical Memorandum as a contributing resource to the BARC Historic District. Treasury will further consider potential impacts to Walnut Grange, as well as potential mitigation of such impacts, in consultation with Prince George's County through the Section 106 process. No change made to the FEIS.	Cultural Resources	Jennifer Stabler	Prince George's County Planning Department, Historic Preservation
PM-12	2	106	And I'm also curious whether the buildings that are proposed to be removed are going to be reported on a Maryland Inventory of Historic Properties form. I haven't read through the entire document yet, so that may be in there. And then I'll be commenting separately on the impacts of the archeological resources.	Comment noted. Appropriate mitigation for adverse impacts to historic resources, potentially including documentation on a Maryland Inventory of Historic Properties form, would be determined through the Section 106 consultation process. No change made to the FEIS.	Cultural Resources	Jennifer Stabler	Prince George's County Planning Department, Historic Preservation
Section 3.10 - Traffic and Transportation							
392	2	003	I am concerned about impacts on bicyclists along Powder Mill Rd. The BARC area is very popular for local cyclists and all of the roads in the area get heavy cyclist use. Construction managers should think carefully about cyclist safety during construction. A wide shoulder on the bike lane should be added through the new section of Powder Mill Rd, to connect to the existing wide shoulders on the road.	Comment noted. Construction activities would be conducted in a manner that maintains the safety of all Powder Mill Road users, including bicyclists; temporary closures of Powder Mill Road may occur during construction (see Section 3.10.2.2 of the FEIS). Additionally, Treasury would consider creating on-site pedestrian and/or bicycle amenities as part of the Preferred Alternative (see Section 3.10.3 of the FEIS). No change made to FEIS.	Traffic and Transportation	John Ausema	
393	3	003	I think planners should also consider allowing bike/pedestrian access along the new road to the facility and along a right of way or trail on the edge (outside of) the facility to increase options for cyclist and pedestrian connections between Odell and Powder Mill Roads.	Comment noted. Treasury cannot accommodate a bike or pedestrian trail on its parcel due to space limitations. The commenter may contact the USDA regarding this request elsewhere on BARC. No change made to the FEIS.	Traffic and Transportation	John Ausema	

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Comment #	Comment # by Reviewer	Commenter ID#	Comment	Response to Comment Blue Shading: Change made to the FEIS. Green Shading: No change made to the FEIS.	Topic(s)	Name Organization (if applicable)
394	1	006	I am writing to register my discontent with the proposed Replacement Currency Production Facility at the Beltsville Agricultural Research Center. I am a resident in <redacted> near BARC and would be negatively impacted by the vehicle noise and traffic. This is a wildlife refuge and is the reason I moved to this area. Please reconsider this building site.	Comment noted. Treasury would minimize potential noise and traffic impacts to the extent feasible, including through implementation of the proposed EPMs/RCMs identified in Table 2.2-1 of the FEIS. No change made to the FEIS.	Traffic and Transportation	Talia Kowitt
395	1	008	Overall I support the relocation of the currency production facilities from DC to the Beltsville Agricultural Research Center. However, I have serious concerns regarding the significant transportation impact on the surrounding subdivisions from building and operating the proposed currency production facilities at BARC. The use of Baltimore Washington Parkway (BWP) by any heavy trucks (including those used for transportation of materials and currency) should be prohibited at the Powder Mill Road (Intersection 12 and 13) or Muirkirk Road exits. The surrounding roads to these exits are already congested with residential traffic. Springfield Road (Intersection 12), which intersects with Powder Mill Road near BWP and the entrance to BARC, is a small, two lane, winding road that has various sections of low visibility. Traffic already backs up on it due to increasing use of Powder Mill Road through BARC as a cut-through to BWP. The existing character of the surrounding area is a rural tier, limited development and the residents live here because of that protection. Muirkirk Road is the next north-bound exit from Powder Mill and drivers may try to use it as a back way to get to the facility by using Odell Road to access BARC through Springfield Road.	Comment noted. As identified in Table 2.2-1 of the FEIS, commercial trucks associated with the Proposed Action would comply with existing truck restrictions, such as the prohibition of commercial trucks on the Baltimore-Washington Parkway. Intersection 12 is recognized as a potentially failing intersection under the Preferred Alternative, and mitigation would be considered to address any adverse impacts to traffic at this intersection. Please refer to Section 3.10.3 of the FEIS for further discussion of recommended mitigation measures that Treasury would consider to reduce potential adverse traffic and transportation impacts. No change made to the FEIS.	Traffic and Transportation	Angelique Dorsey
396	2	008	All heavy truck traffic should be required to use the Kenilworth Avenue exit off of 495 or Greenbelt Road. These roads have multiple lanes and are designed to support such use. The portion of Kenilworth Avenue that turns into Edmonston Road between Cherrywood Lane and Powder Mill Road should be widened to support the increased traffic. This can be accomplished by taking BARC land only and will relieve existing and future traffic backups caused by the narrowing of the lanes from two to one at Cherrywood Lane traffic light.	As noted in Table 2.2-1 of the FEIS, Treasury anticipates that trucks would be routed along Powder Mill Road, Edmonston Road/Kenilworth Avenue, and the Capital Beltway to minimize its use of collector and local roads. The portion of Edmonston Avenue between Cherrywood Lane and Powder Mill Road contains three intersections for which Treasury would consider mitigation measures; these mitigation measures, conceptually identified in the Transportation Impact Study , may include widening portions of Edmonston Road to ensure proper functioning of these intersections. No change made to the FEIS.	Traffic and Transportation	Angelique Dorsey
397	3	008	Please respect the current residents of the area and ensure the majority of the increased traffic caused by this development is directed to major transportation routes and diverted from roads that have been designed to support access to low-density development.	Comment noted. Treasury is committed to a respectful relationship with the local residents near the proposed CPF. Treasury is considering numerous mitigation measures that would reduce the Proposed Action's potential adverse traffic and transportation impacts (see Section 3.10.3 of the FEIS). No change made to the FEIS.	Traffic and Transportation	Angelique Dorsey

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398	1	013	I reviewed the online version of the Traffic Impact Statement (all 876 pages!) related to this project. 1. I could not review Figure 4-6 located on page 44 as it was all black! Please change this and post an updated version. Another option is to send me a corrected page so I may review.	Comment noted. This figure in the Transportation Impact Study was redacted due to its inclusion of 'For Official Use Only' data. USACE re-created this figure without the sensitive data and provided it to the commenter via email on December 15, 2020. No change made to the FEIS.	Traffic and Transportation	Mark Middlebusher
399	2	013	2. While the traffic studies may have been done according to professional guidance, I still recommend that MD 201 between Cherrywood Lane and Sunnyside Avenue should be widened to 4 lanes from its existing 2 lanes (as initially noted in comment #17 - page 213). I understand the reasonings provided in the Final Resolution, but feel like once the future traffic increases with this project, the impacts during that section will be dramatic. As a local resident, I see the current demands of this bottleneck whenever I travel down that road.	Comment noted. Treasury would consider mitigating adverse impacts to Intersection 6 (MD 201 and Sunnyside Avenue) resulting from the Proposed Action, which may include widening a portion of MD 201. Please also refer to Response to Comment 396. Treasury would continue to consult with local planning authorities regarding potential traffic impacts and mitigation measures. No change made to the FEIS.	Traffic and Transportation	Mark Middlebusher
400	3	013	For those employees who chose to drive MD295 North coming to work, when a wreck occurs on MD295, the most feasible alternative for them will be to take MD 201 North. (those workers from Quadrant 3 - page 224). This will increase the traffic counts on this section of the road tremendously.	Comment noted. Please refer to Response to Comment 399.	Traffic and Transportation	Mark Middlebusher
401	4	013	I recommend that the project take another look at this part of the project and reassess the impacts. If the decision is still "No", I recommend the project write a letter to MD SHA and PGC DOPW justifying their reasoning.	Comment noted. Please refer to Response to Comment 399.	Traffic and Transportation	Mark Middlebusher
402	3	014	I'm also concerned about the noise and fumes of increased traffic on Powder Mill Road. Arrangements for additional bus and shuttle service, plus incentives for riders, should definitely be made to reduce traffic, and the size of the parking lot -- nearly as large as the building! I hope that the footprint can be reduced somewhat. And I hope that the large building size will accommodate solar panels on the roof (or parking lot if the size isn't reduced).	Comment noted. As identified in Table 2.2-1 in the FEIS, Treasury would implement an agreement with the USDA to allow employees of the proposed facility to utilize existing shuttle service from the Greenbelt Metro. Additionally, as noted in Section 3.10.3 of the EIS, Treasury would consider a mitigation measure to consult with WMATA regarding the potential for adjusting Metrobus routes to stop near the proposed facility. Finally, the inclusion of solar panels in the proposed facility design is being considered to achieve a LEED rating of Silver (see Section 2.2.1 of the EIS). No change made to the FEIS.	Traffic and Transportation Description of Proposed Action	Deanna Dawson

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403	4	015	The Transportation impacts in this community need to be carefully assessed and planned. Several years ago, the Maryland Department of Transportation and CSX Railroad considered locating an Intermodal Facility at BARC. The 120-acre proposed site would have included a 1,000 truck trips per day from the Port of Baltimore. The level of impact from this proposed BEP plan is surely much less but still requires truck trips, additional paved impervious surfaces outside the project to accommodate the projects impacts years after the decision to move forward was made, and increased traffic through the BARC where wildlife has reestablished and speed limits are strictly enforced. Undoubtedly, employees, vendors, contractors and others will look for alternative routes through the farm and surrounding communities that will not be evaluated in the canned traffic analysis completed for this DEIS exercise. I know: BARC was between my home and one of my previous workplaces in Beltsville. Those additional trips in the surrounding communities do not show up as an impact on a transportation model but have a devastating impact on those communities that includes noise, trash, speeding, accidents, reduced property values, and then road “improvements” that alter the community.	Comment noted. Treasury anticipates 82 trucks would arrive at and depart from the proposed facility per week. Treasury does not anticipate significant additional impervious surfaces would be constructed outside the Project Site as a result of the Proposed Action; improvements to local roads may be made as identified in the FEIS to mitigate anticipated traffic impacts. Improvements to existing transportation infrastructure, such as the recommended mitigation measures (see Section 3.10.3 of the FEIS) that Treasury would consider to reduce adverse traffic impacts, would reduce the need for Treasury employees to find alternate routes to work by improving traffic flow along main roadways. Please also see the Response to Comment 402 concerning additional traffic reduction measures, including public transit solutions. No change made to the FEIS.	Traffic and Transportation	James Foster Anacostia Watershed Society (AWS)
404	1	022	Powder Mill Road is a popular route for cycling. As proposed, the Replacement Currency Production Facility does not appear to inordinately effect cyclist safety.	Comment noted.	Traffic and Transportation	c/o Sylvia Mosser MDOT
405	2	022	The addition of bus stops (with a shelter) near the proposed printing facility should be considered for the provision of alternative modal choices for staff commuting to and from the facility.	Comment noted. Treasury has identified a recommended mitigation measure to consult with WMATA regarding adjustment of Metrobus routes to serve the proposed CPF more effectively. This mitigation measure was revised to include potential installation of bus stop shelters (see Section 3.10.3 of the FEIS).	Traffic and Transportation	c/o Sylvia Mosser MDOT
406	3	022	Because the peak hours studied of the proposed facility do not overlap with local peak-hours, proposed mitigation may be insufficient to address future build-year local peak-hour congestion.	Comment noted. Treasury's mitigation for adverse traffic and transportation impacts would be designed to address the impacts resulting from this specific Proposed Action. Treasury would implement traffic mitigation measures in consultation with local planning authorities, and may consider participating in joint traffic improvement actions when such actions exceed the mitigation appropriate for Treasury's Proposed Action. No change made to the FEIS.	Traffic and Transportation	c/o Sylvia Mosser MDOT
407	4	022	The site of the proposed facility is located just east of the Powder Mill Road intersection at MD 201 (Kenilworth Avenue), which is located within the limits of the MD 201 Extended/US 1 Corridor (I-95/I-495 to North of Muirkirk Road) Planning Study, a study of capacity improvements in the MD 201 and US 1 corridors. This study remains on hold pending identification to complete planning. For additional information concerning potential impacts from proposed alternatives, please contact Barry Kiedrowski, P.E., MDOT SHA [State Highway Administration] Project Management Chief, at 410-545-8769 or via email at bkeidrowski@mdot.maryland.gov.	Comment noted.	Traffic and Transportation	c/o Sylvia Mosser MDOT

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408	5	022	Comment from OE: Based on a review of the included information, the nearest identifiable asset, Powder Mill Road, lies within the proposed construction area, although MDOT SHA maintenance of Powder Mill Road ends at the Edmonston Road intersection, approximately 3,000-feet west of the proposed limits of disturbance. A traffic study included in the DEIS, however, identifies significant impacts to traffic congestion at eight intersections (Edmonston Road and Sunnyside Avenue/Beaver Dam Road, Powder Mill Road and Odell Road; Powder Mill Road and Soil Conservation Road/Baltimore Washington Parkway NB/SB [northbound/southbound] and Springfield Road) that fail current level of service requirements under peak conditions. No public transport services link directly to this site. Additional coordination with MDOT SHA is recommended to review changing traffic patterns, volumes and interchange needs once formal plans are developed.	Comment noted. Treasury identified potential significant adverse impacts to six local intersections (see Section 3.10.2.2), and would consider implementing mitigation measures, in consultation with local planning authorities such as MDOT SHA, to reduce these adverse impacts (see Section 3.10.3). No change made to the FEIS.	Traffic and Transportation	c/o Sylvia Mosser MDOT
409	5	025	Moreover, the DEIS states that the proposed facility would operate 24 hours a day. Because of the decreased accessibility of the proposed facility to public transit compared to the BEP DC facility, there would be an increase in the number of employees driving. According to the DEIS, this increase in traffic from commuters and trucks (e.g., deliveries) would have significant adverse impacts on traffic in the local region of influence in 2029 (i.e., when the proposed facility becomes operational). According to the analysis in the traffic and transportation technical memorandum, of the 1,427 employees at the proposed facility, 1,138 would work during the day shift (i.e., 6:30 a.m. to 3:00 p.m.). The remainder would be almost equally dispersed over the evening and midnight shifts. The memorandum estimates that 88 percent of day shift employees would drive to work, and while not discussed, presumably, 100 percent of evening and midnight shift employees. In addition, the technical memorandum states that approximately 82 trucks (i.e., 27 box trucks and 55 semi-trucks) would arrive at and depart from the proposed facility weekly for shipments and deliveries.	Comment noted.	Traffic and Transportation	Kiki Theodoropoulos
410	1	027	The impact of additional traffic on already heavily congested local roads is a major concern. The DEIS studies 15 intersections identified in the local region of influence (ROI) and finds that several of them will have failing levels of service (LOS). Other intersections in the study area will have failing and increased queue lengths. It neglects, however, to consider the likely impacts on other nearby roadways. Roads such as MD 193, US Route 1, and Kenilworth Avenue have not been adequately studied. These roads are already highly congested and will be used by employees living in nearby neighborhoods to reach the project site. The local ROI should be extended west to US Route 1 and south to MD 193 to capture the signalized intersections along these routes for analysis. The most recent traffic data from the Metropolitan Washington Council of Governments should be utilized. Also, the proposed site is not directly accessible by public transportation.	Comment noted. Treasury identified the local ROI in consultation with the M-NCPPC, the City of Greenbelt, Maryland SHA, the USACE Baltimore District, the NCPC, and the NPS. No change made to the FEIS.	Traffic and Transportation	Philip S. Aronson

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411	1	034	As someone who commutes through BARC to get to work, I am concerned that there won't be enough public transit options to accommodate the increased traffic for the repurposed facility. It's too bad that the Purple Line isn't going far north enough to accommodate planned growth. If the Green Line can't be extended through to Columbia, Ellicott City, and points north, with stops along the way for BARC, then the only other viable option would be increased bus service to the area. Without these extra transit options, this new planned use could have terrible impacts on prevailing traffic patterns. Thanks for taking the time to consider these impacts.	Comment noted.	Traffic and Transportation	Jennifer Kalmanson
412	2	038	In addition, the construction and emissions from the proposed treasury facility may negatively affect their studies, causing inaccurate data. The construction will also cause unnecessary increases to traffic in the area - the Baltimore/Washington parkway, kenilworth/Edmonston, and the beltway are already congested, and this construction will increase traffic through increased commuters and potential road shutdowns during construction.	Comment noted.	Traffic and Transportation	Joshua Carter
413	21	039	The ROI for pedestrian impacts is 0.25 miles in all directions of the project site, and the ROI for bicycle impacts is one mile in all directions of the project site. In this instance, it is unclear why a network analysis has not been used (especially if the intersection of Odell Road and Poultry Road is to remain closed).	Comment noted. Treasury determined that 0.25 mile represents the typical distance between the Project Site and nearest bus stop, and 1 mile represents the typical distance a bicyclist would be willing to travel to reach the site. Please refer to the Transportation Impact Study . No change made to the FEIS.	Traffic and Transportation	Holly Simmons City of Greenbelt
414	87	039	XVI. Traffic and Transportation During the public scoping period, the City of Greenbelt raised traffic- and transportation-related concerns including: 1) Potential road closures within the BARC campus, and impacts on motorists, pedestrians and cyclists. 2) Traffic impacts/safety including heavy truck traffic. 3) Traffic patterns and impacts on local roadways including Edmonston Road, Sunnyside Avenue and Powder Mill Road.	Comment noted. Please refer to Responses to Comments 416 and 420.	Traffic and Transportation	Holly Simmons City of Greenbelt
415	88	039	The City offers the following comments: DEIS does not clearly state which transportation mitigation measures would be implemented.	Comment noted. Treasury will identify in the ROD which mitigation measures it would implement if it selects the Preferred Alternative for implementation. No change made to the FEIS.	Traffic and Transportation Mitigation Measures	Holly Simmons City of Greenbelt
416	90	039	Potential for increased traffic on Greenbelt's local roadways. The City is concerned that any unmitigated short- and long-term adverse traffic impacts will result in increased (cut through) traffic on Greenbelt's local roadways and potential adverse impact to residential neighborhoods. This concern must be addressed in the DEIS.	Comment noted. Section 3.10.2.2 of the FEIS was revised to note that increased congestion in the local ROI could result in additional cut-through traffic on residential and back roads, which could also lead to public safety concerns (particularly for pedestrians). The analysis also notes that implementation of intersection mitigation measures would effectively eliminate this potential impact.	Traffic and Transportation	Holly Simmons City of Greenbelt

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417	91	039	DEIS fails to address safety concerns. Although the associated Technical Memorandum recognizes traffic-related safety concerns as one of the primary concerns raised by commenters during the public scoping period, the DEIS provides no analysis of or information regarding this concern. The only mention of traffic-related or pedestrian safety is in an optional mitigation measure recommending that Treasury “Consult with WMATA regarding the opportunity to adjust Metrobus routes such that they serve the proposed CPF more effectively (e.g., instating a bus stop along the proposed CPF’s driveway), thereby reducing traffic in the local ROI by making public transit more accessible and functional for employees, and improving pedestrian safety by reducing the need for employees to walk along Powder Mill Road to access a bus stop”. Safety concerns must be addressed and appropriate EPMs must be adopted.	Comment noted. Please refer to Response to Comment 416.	Traffic and Transportation	Holly Simmons City of Greenbelt
418	92	039	Mitigation outlined in the TIS and referenced in the DEIS includes significant widening of MD-201 (Edmonston Road). Recommendations include: a. Adding a second approach through lane and receiving lane in both directions at the intersection of Edmonston Road/Sunnyside Avenue b. Adding a second eastbound Powder Mill Road through lane and adding additional turn lanes at the intersection of Edmonston Road/Powder Mill Road. The City of Greenbelt is not in favor of any street widening, particularly on Edmonston Road. The City recommends that alternative means of mitigation be employed to fully address necessary mitigation.	Comment noted. Treasury would consult with local planning authorities regarding the design of intersection mitigation measures. No change made to the FEIS.	Traffic and Transportation Mitigation Measures	Holly Simmons City of Greenbelt
419	93	039	Intersection of Edmonston Road and Beaver Dam road not identified for possible mitigation in the DEIS. The TIS recognizes that mitigation at this intersection is not required, but recommends it, based on the “potential gap acceptance issues for vehicles attempting southbound left turns from Edmonston Road onto eastbound Beaver Dam Road”; however, the DEIS does not identify this intersection as experiencing a significant adverse impact because it has a volume of less than 100 vehicles per hour. The City believes that mitigation for this intersection which does not include widening should be reconsidered, and impacts should be fully addressed.	Comment noted. Section 3.10.3 of the FEIS was revised to include a recommended mitigation measure for improvement of Intersection 7 to improve safety.	Traffic and Transportation Mitigation Measures	Holly Simmons City of Greenbelt
420	94	039	Anticipated short- and long-term road closures. The DEIS states that all or part of Powder Mill Road would be temporarily closed to construct necessary modifications, and states that one-way alternating traffic would be used to the extent practical and roadwork would be coordinated with local authorities to maintain a less-than-significant impact. Construction would also result in the closure of the striped shoulder on Powder Mill Road between Edmonston Road and the Baltimore-Washington Parkway that provides space for cyclists. The DEIS states that these closures will have a less-than-significant impact on local traffic and the bicycle network. It does not appear that any other short- or long-term road closures would occur; however, the DEIS does not clearly state whether CPF operational requirements are anticipated result in additional permanent road closures. The DEIS should clearly indicate whether the road closure at the intersection of Odell Road and Poultry Road is intended to persist.	Comment noted. Section 3.10.2.2 of the FEIS was revised to state that operation of the proposed CPF would not result in any permanent public road closures. Poultry Road, a private BARC road which is currently closed at its intersection with Odell Road, would be demolished within Treasury’s proposed parcel, but remain accessible from Powder Mill Road for BARC operations.	Traffic and Transportation	Holly Simmons City of Greenbelt

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421	95	039	Employee travel surveys did not capture baseline data. The survey gathered information on employees' expected travel modes to a possible CPF located at BARC; however, it does not appear to have gathered information on employees' current travel mode to the CPF in Washington, DC. Establishing this baseline would provide a better understanding of Proposed Action impacts and would benefit the TIS and the DEIS.	Comment noted. Section 3.10.1.3 of the FEIS was revised to include the baseline transit ridership data under existing conditions for BEP employees. This data represents normal (pre-pandemic) conditions.	Traffic and Transportation	Holly Simmons	City of Greenbelt
422	96	039	Baseline transit ridership data is not provided. The DEIS does not provide data regarding the number of employees and visitors currently and historically (i.e., pre-COVID-19) arriving and departing the existing CPF by transit. This information should be provided to facilitate a better understanding of impacts to transit ridership.	Comment noted. Please refer to Response to Comment 421.	Traffic and Transportation	Holly Simmons	City of Greenbelt
423	97	039	A decrease in transit ridership should be considered a significant adverse impact. The significance threshold outlined in the associated Technical Memorandum defines a significant adverse effect as one that would "Interrupt an existing public transit route over the long-term without a convenient replacement" or "Cause an abrupt, unplanned change in existing transit ridership levels that would require the transit authority to alter existing operations". BARC is significantly less transit-accessible than the existing facility, and therefore an overall drop in transit ridership is possible. However, based on the defined significance threshold, the DEIS finds that the generation of new transit trips in one direction or another would create an adverse impact. The transit system should be viewed holistically, and any system-wide reduction in transit ridership resulting from the Proposed Action should be conceived of as a negative impact. This could be addressed through revisions both to the significance threshold and the ROI.	Comment noted. Section 3.10.2.2 of the FEIS was revised to note that WMATA could also experience adverse impacts from potential reductions in revenue associated with the loss of approximately 800 daily entries, but this change would be negligible relative to overall Metrorail use in Washington, D.C. (i.e., approximately 626,000 daily entries on average).	Traffic and Transportation	Holly Simmons	City of Greenbelt
424	98	039	Concerns regarding truck traffic are insufficiently addressed. The Transportation Technical Memorandum states that Treasury assumes there would be 7,278 dump trucks over the construction period (approximately one-two years). During operation, Treasury anticipates that 82 trucks would arrive and depart the CPF each week, some during the evening and midnight shifts. The DEIS states that construction traffic and construction noise would have a less-than-significant adverse impact on the local area. The DEIS states that truck traffic during operation of the CPF would have a less-than-significant adverse impact on roadways with EPMs in place. The DEIS will incorporate a number of EPMs, RCMs, and BMPs to minimize the impact of trucks, including restricting truck arrival and departures and restricting truck traffic on residential roads; however, the City is concerned that trucks traffic during construction and operation would have a noticeable adverse effect. This should be recognized in the DEIS.	Comment noted. Truck traffic would be noticeable, but less than significant. No change made to the FEIS.	Traffic and Transportation	Holly Simmons	City of Greenbelt
425	100	039	It is unclear if visitor traffic has been accounted for in the TIS. The TIS recognizes that the CPF would include a visitor center, but it is unclear how many visitors are expected and whether the TIS accounts for visitor traffic to the site.	Comment noted. Section 3.10.2.2 of the FEIS was revised to include a brief analysis of visitor traffic. Public visitation was not included in the Transportation Impact Study , as it would generally not occur during the local ROI's peak hours or Treasury's primary commuting hours. Public visitation would primarily occur during the middle of the workdays.	Traffic and Transportation	Holly Simmons	City of Greenbelt

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426	101	039	Roadway impacts incurred during this Project should be reconstructed with all master-planned bicycle and pedestrian facilities. Since Powder Mill Road is a future location for bike lanes, the City reiterates NCPD's earlier suggestion that new bike lanes connecting the site to the existing bike lanes on Edmonston Road should be installed. This would encourage the use of bicycles to commute to the BEP facility.	Comment noted. Treasury identified in Section 3.10.3 of the FEIS a recommended mitigation measure to incorporate on-site pedestrian and/or bicycle amenities into the Preferred Alternative during the design process. No change made to the FEIS.	Traffic and Transportation	Holly Simmons City of Greenbelt
427	102	039	Depiction of proposed internal circulation would be useful for informational purposes. This would include proposed location of loading zones.	Comment noted. Please refer to Figure 2.4-2 in the FEIS for the concept site plan, including proposed roads. The site plan would be further refined during the design process. No change made to the FEIS.	Traffic and Transportation	Holly Simmons City of Greenbelt
428	4	040	Traffic. Any local resident, in non-COVID time, can tell you that the roads surrounding and through the BARC are bumper to bumper Northbound, Southbound, East, and West from 5:30am until 9:30am in the mornings and from 3:30pm until 7:00 pm in the evenings. Needless to say, the 8 failing intersections you noted will most likely become 15 out of 15 failing intersections if the facility is built. While you note the failure of intersections, the lack of alternative transportation, and the need for improvements you did not state who will be responsible for these -- the Federal government or the local elderly and disadvantaged population.	Comment noted. As stated in Section 3.10.2.2 of the FEIS, operation of the Preferred Alternative would result in significant adverse impacts to six intersections, compared to significant adverse impacts to two intersections under the No Action Alternative. Section 3.10.3 further states that Treasury would be the proponent of intersection mitigation measures. No change made to the FEIS.	Traffic and Transportation	Melissa Daston
429	35	044	Traffic is a source of air pollution such as ozone, particle pollution, and air toxics. The health effects of mobile source air pollution affect millions of people, especially those who live near busy roads. Reduction of traffic impacts where possible, along with greenspace enhancements such as roadside vegetation can reduce impacts to local communities.	Comment noted.	Traffic and Transportation	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
430	38	044	Traffic and TransportationIt is anticipated that the majority of personnel will drive in single-occupancy vehicles, adding to congestion in the surrounding transportation network and creating the demand for a large parking area onsite. We encourage working with partners like the Washington Metropolitan Area Transit Authority to enhance public transit access to the site and to provide incentives for transit and ride sharing. We recommend developing a Transportation Management Plan for the facility to evaluate strategies to reduce use of single occupancy vehicles and encourage reduction of the need for parking.As indicated above, we recommend incorporating pedestrian and bicycle amenities into the Preferred Alternative to provide better access to the site and as an improvement for local residents.	Comment noted. Treasury identified a recommended mitigation measure to consult with WMATA regarding the opportunity to make the Project Site more accessible via Metrobus (see Section 3.10.3 of the FEIS). Treasury also revised Table 2.2-1 to include an EPM to prepare a Transportation Management Plan, including annual reviews of CPF employee commuting methods and provisions to encourage alternate modes of transport. Please also refer to Response to Comment 426.	Traffic and Transportation	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment

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431	5	045	Traffic and Transportation Treasury must fund and do all proposed mitigation for road, traffic signal and other improvements recommended, especially for the six (6) intersections that fail. In addition, Treasury should implement multi-modal elements, including shuttle, bicycle and pedestrian for both employees and surrounding communities, and engage WMATA is extension and/or expansion of transit service and transit/commuter benefit programs to the proposed CPF to reduce single-occupancy vehicle (SOV) usage.	Comment noted. Treasury will identify in the ROD which mitigation measures (including potential intersection improvements, incorporation of on-site pedestrian and/or bicycle amenities, and WMATA engagement) it would implement if it selects the Preferred Alternative for implementation. No change made to the FEIS.	Traffic and Transportation Mitigation Measures	Todd M. Turner	County Council Member, 4th District Prince George's County Council
432	3	046	3. Traffic along Powder Mill Road is significant now during morning and evening rush hours and will only be increased and probably occur throughout the day and even during the night with this type of 24-hour facility operation.	Comment noted. Please refer to Section 3.10.2 of the FEIS for Treasury's detailed traffic analysis.	Traffic and Transportation	Albert Klein	
433	4	046	4. Heavy vehicles including semis and employee traffic will have a major impact on the surface condition of Powder Mill Road.	Comment noted. Public roadways would be maintained in accordance with current protocols.	Traffic and Transportation	Albert Klein	
434	6	046	6. Minimal public transportation for the 1600 employees that will be working at this facility.	Comment noted.	Traffic and Transportation	Albert Klein	
435	13	048	Traffic and Transportation. The Draft EIS studied 15 intersections surrounding the BARC property and found 8 of the 15 currently operating at failing level. Furthermore, the analysis found the pedestrian and bicycle network extremely limited and that there is no public transportation that services the proposed area of the BARC property. The construction phase will require temporary closure of part or all of Powder Mill Road - further exacerbating traffic congestion. This additional degradation of roadways during construction was deemed to be of less-than-significant adverse impact. Long-term mitigation measures of use of the USDA shuttle, adjusting signal control, changing roadway configurations, and adding new lanes are suggested with no data on impact of each and no statement of who would pay for such changes. The conclusion that there will be no impact on failing roadways puts into doubt the logic and analysis used. Any additional negative impact will be significant on already overcrowded and failing roadways.	Comment noted. As stated in Section 3.10.3 of the FEIS, Treasury would be the proponent of any traffic mitigation measures. The Transportation Impact Study includes detailed analysis of the potential intersection mitigation measures to demonstrate effectiveness. However, the specific design and analysis for mitigation measures is beyond the scope of the FEIS; Treasury would complete this process if it commits to these mitigation measures in the ROD. Please also refer to the Master Response provided under "Perceived "Connected" Actions" in Section 9.0 of the FEIS. No change made to the FEIS.	Traffic and Transportation	Thomas E. Dernoga c/o Michelle Garcia	Prince George's County Council
436	14	048	The proposed CPF will have a surface parking lot of 1,179 spaces which assumes the majority of employees will be commuting by single-occupancy vehicles, which is not included in the analysis. There is no reference to an exception to the 3-1 parking regulation at new Federal facilities enacted during the Carter administration. Based on the existing regulation, the new CPF should be providing 533 parking spaces only. There was also no analysis of the use of permeable pavers or the use of a parking garage to minimize the parking footprint which would lessen the environmental impacts.	Comment noted. Treasury is consulting with the NCPD regarding site parking requirements. Please refer to Response to Comment 30, the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS, and the Response to Comment 31.	Traffic and Transportation	Thomas E. Dernoga c/o Michelle Garcia	Prince George's County Council

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437	4	054	Regarding commuting impacts, we recommend the DEIS include a comparison of the existing modal split from the current downtown site with the proposed modal split for the new facility to better understand the changes being proposed. This information is important to understand since the new facility will not be located near a Metrorail station and it will likely result in a change in commuter ridership and the number of single occupancy vehicles commuting to work.	Comment noted. Section 3.10.1.3 of the FEIS was revised to include the baseline transit ridership data under existing conditions for BEP employees. This data represents normal (pre-pandemic) conditions. Section 3.10.2.2 was revised to include a comparison of modal splits for the existing DC Facility and the proposed CPF.	Traffic and Transportation	Carlton Hart	NCPC
438	5	054	It is also our understanding that the number of visitors anticipated at the facility is evolving. Initially, the Department of Treasury described that the only visitors to the facility would be VIPs. During the recent DEIS public meeting on December 2, 2020, Treasury officials described an educational component of the CPF allowing scheduled tours. As this was not expressly described in the DEIS or transportation analysis report, we are interested in understanding this more fully. In particular, please detail how many visitors are anticipated to visit this facility annually as it is unclear what impact these additional vehicles will have on the local transportation network. This should include a comparison of the CPF with similar sized facilities. Please also include a description of how this will be operated, given the existing BEP facility in Washington, DC is also used for tours.	Comment noted. Section 2.2.1 of the FEIS was revised to include a brief description of the proposed CPF's public features and visitation limits. This information is further discussed in Section 3.10.2.2 of the FEIS. Please also refer to Response to Comment 425.	Traffic and Transportation	Carlton Hart	NCPC
439	3	056	Please promote recreational opportunities near your new plant. Please allow as many biking and hiking trails as possible, with appropriate road crossings and traffic lights. Please upgrade roads as necessary. Commuting by bicycles is very important for your staff, and also for the neighborhoods around you.	Comment noted. Please refer to Responses to Comments 392 and 393.	Traffic and Transportation	Jeanette Helfrich and John Rayner	
440	4	056	This comment is intended to apply to all federal facilities: please promote trails for biking and hiking on all of your properties. I cannot see why security, especially since 9/11/011, would preclude recreational trails on federal property. Near where I live on <redacted>, we used to be able to run and exercise on the roads on the federal property but can do so no longer. I feel the security is unnecessary at this level. The public should be able to recreate on public property. Please pass this comment on to GSA and other federal facilities.	Comment noted. Please refer to Responses to Comments 392 and 393.	Traffic and Transportation	Jeanette Helfrich and John Rayner	
441	6	056	Moreover, please be a good neighbor and help promote good transportation possibilities in the area around you, including railways in the Beltsville and Laurel areas, providing links to Metro rail and Metro Bus services. This is both for the purpose of your staff, your neighbors, and your constituents. Thank you.	Comment noted.	Traffic and Transportation	Jeanette Helfrich and John Rayner	
PM-6	1	102	I actually work in a building right near where the proposed site is going to be, and I commute to work every day from St. Mary's County. And I'm concerned about the extra traffic on the one-way roads on Powder Mill Road and the condition of the roads and if there's going to be any improvements made or expansions.	Comment noted. Please refer to Section 3.10.3 of the FEIS for a list of recommended traffic mitigation measures. No change made to the FEIS.	Traffic and Transportation	Cheryl East	

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PM-9	2	104	And I'm very concerned about traffic on Powder Mill Road and other access areas that people use during the week to get into Greenbelt. I live in Greenbelt. My name is Michael Hartman and I live in Greenbelt. And I'm very concerned about the impact on the studies you did not do on Greenbelt because people could take a shortcut from the BW Parkway if they didn't want to take Powder Mill Road or if they're coming north.	Comment noted. Treasury consulted with the City of Greenbelt regarding the intersections to analyze in the Transportation Impact Study .	Traffic and Transportation	Michael Hartman
PM-20	3	109	The third comment is that Michael Hartman and someone else mentioned about traffic problems, transportation problems. In the technical background for the DEIS, it mentioned that there were, I think, 12 different intersections that would have significant adverse impacts. And it mentioned that all but one then would not have those impacts if remediation was done. But it didn't say when -- what those improvements or remediation was. So we're supposed to take for granted that, oh, geez, they know the answer to fix all the problems to make transportation work well? I think that was totally lacking there.	Comment noted. Please refer to Response to Comment 435.	Traffic and Transportation Mitigation Measures	John Lipart Chair of the Greenbelt Green Team
Section 3.11 - Utilities						
442	4	014	It sounds like there will be a large amount of wastewater generated in the production process. What will be the source of the water -- was that mentioned in the DEIS?	Comment noted. As identified in Table 3.11-1 of the EIS, WSSC would likely be the primary source for water at the proposed facility, although Treasury would establish a connection to the USDA water system for supplemental purposes. No change made to the FEIS.	Utilities	Deanna Dawson
443	62	016	(Section 3.11.2.2) It is not clear why onsite wastewater treatment is not discussed in this section. Is this treatment not considered a utility? If not discussed in this section, suggest a reference to Section 3.13 be added to the text.	Comment noted. Section 3.11 focuses on utility supply, demand, and infrastructure as it relates to external systems. Please refer to the Master Response provided under "Wastewater Treatment - On-site Treatment" in Section 9.0 of the FEIS.	Utilities	Debbie McKinley
444	64	016	(Lines 2488-2491) The fate of stormwater resulting from the decoupling the stormwater and sanitary sewer systems is not addressed under Section 3.7.2. For completeness, the fate of the stormwater that would no longer be routed through the sanitary sewer system should be addressed as an environmental impact of the Preferred Alternative.	Comment noted. Section 3.11.2.2 of the FEIS was revised to note that stormwater decoupled from the sanitary sewer system would be managed within Treasury's overall stormwater management strategy, which would include GI/LID techniques, in compliance with Section 438 of the EISA and EO 13508. General stormwater impacts of the Preferred Alternative are discussed in Section 3.7.2.2 of the FEIS. Please also refer to the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS.	Utilities	Debbie McKinley

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445	61	039	Unclear if deficiencies in existing stormwater infrastructure will be addressed. The Utilities Technical Memorandum notes that existing stormwater management capacity is “unknown; however, existing drainage is obsolete with significant inflow and infiltration issues”. The Water Resources Technical Memorandum notes that 51% of the site drains to existing stormwater management infrastructure, which drains to Indian Creek. The DEIS must provide information regarding whether the Proposed Action would address issues with existing stormwater management infrastructure. If so, specific actions must be outlined in the DEIS.	Comment noted. Section 3.11.2.2 of the FEIS states that stormwater requirements would be determined during the Proposed Action's design phase. Please also refer to Response to Comment 444 and the Master Response provided under "Stormwater Management / Green Infrastructure / Low Impact Development" in Section 9.0 of the FEIS.	Utilities	Holly Simmons City of Greenbelt
446	32	044	Utilities The DEIS indicates that existing utility infrastructure at the Project Site would be removed and replaced. We recommend clarifying if any additional tree removal, aquatic resource impacts, or other impacts to other resources are associated with these upgrades and connections.	Comment noted. Treasury developed a reasonable approximate LOD for analysis in the DEIS based on the available conceptual design. Minor changes to this LOD are possible during the design phase once the full extent of construction activities are known, including for removal/replacement of on-site utilities. Potential impacts associated with these changes would not substantively alter the impact analysis presented in the DEIS. No change made to the FEIS.	Utilities	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
447	1	051	Line 2476 reads, "Treasury has not yet determined solid waste, telecommunication, or stormwater requirements; these will be determined through the proposed CPF design process in coordination with potential providers." This suggests that stormwater management comments are not expected.	Comment noted. Treasury would continue to consult with the MDE throughout the design process. No change made to the FEIS.	Utilities	Amanda Malcolm MDE
Section 3.12 - Socioeconomics						
448	37	044	Socioeconomic Impacts Section 3.12.2.2 indicates that nearby property values may decrease slightly as a result of the proposed CPF. We recommend further analysis of potential impacts to housing and property values for properties along Odell Road using data from similar projects.	Comment noted. Given the many factors that affect real estate values, and the value of individual properties, such an analysis would be speculative, and is beyond the scope of NEPA. Implementation of the EPMs, RCMs, BMPs, and mitigation measures identified in the EIS would serve to minimize adverse effects to these properties that could affect valuation. Conversely, should the Preferred Alternative be selected and 1,600 new jobs placed adjacent to these properties, property values could increase as employees may wish to live closer to their place of work. No change made to the FEIS.	Socioeconomics	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
Section 3.12 - Environmental Justice						
449	1	011	I read through this draft EIS, and several aspects of it, and its creation, are extremely disappointing to me. Here they are below: 1) It says that there is minimal to no impact for environmental justice issues, but it does not address the fact that there is the Vansville unincorporated community that is a mostly ethnic minority, who would be affected by the construction, chemicals, and traffic.	Comment noted. Section 3.12.2.2 of the FEIS identifies the EJ ROI as an EJ area of concern with respect to race, and notes that air quality and traffic and transportation effects could disproportionately impact this community during operation of the Preferred Alternative. No change made to the FEIS.	Environmental Justice	Vijay Parameshwaran

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450	4	032	<p>The inadequacy of data used is most obvious in the Affected Environment and Environmental Consequences (chapter 3). This is where “the rubber hits the road” for any NEPA document, but the content quality and level of detailed information Treasury provided in this DEIS would be considered thin at best for an average EA; but this is an EIS and it is entirely inadequate for an EIS.</p> <p>To start with, a glaring deficiency is section 3.1.2 Resource Areas Dismissed from Further Analysis; it identifies Socioeconomics and Environmental Justice as an issue that is not significant or was covered elsewhere. The rationale provided is bizarre, for undescribed reasons this determination is based on EO 13045 (Protection of Children): “All activities would occur on land currently owned by the USDA, which would be transferred to Treasury; children are not present at the Project Site. During both construction and operation of the Proposed Action, Project Site access would be controlled to prevent unauthorized access, including that of children; if unauthorized personnel are identified on-site, activities would cease until the situation is resolved.” It is unclear how this summary was made, but it is obvious to anyone who lives or works near the proposed BEP site that the adjacent communities’ citizens and private residences will dramatically be affected by the proposed action. Even if you are not from around here, based on aerial imagery it appears this community may be a classic example of a community potentially in need of environmental justice evaluation.</p>	<p>Comment noted. Socioeconomics and Environmental Justice are evaluated in Section 3.12 of the FEIS. Table 3.1-2 notes that Protection of Children, as a subresource within the overall resource area, is dismissed from detailed analysis. No change made to the FEIS.</p>	Environmental Justice	Jeff Shenot
451	103	039	<p>XVII. Environmental Justice</p> <p>Per Title IV of the 1964 Civil Rights Act and Executive Order 12898, “...each Federal agency shall make achieving Environmental Justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations”. The DEIS identifies that an EJ community of concern is present within the ROI with respect to race, and that Treasury’s Preferred Alternative and the “resultant adverse environmental impacts, especially those to air, noise, and traffic, may disproportionately affect EJ communities of concern”. The DEIS does not recommend additional mitigation measures to address these impacts, but instead states that Treasury should implement the mitigation measures recommended in the Air Quality and Transportation and Traffic sections of the DEIS. However, while air quality-related EPMS, RCMs, and BMPs are included in the Proposed Action, no additional mitigation measures are proposed in the Air Quality section. Given the possible disproportionate impact on EJ communities, the DEIS should propose additional air quality, noise, and transportation mitigation measures to further reduce impact to EJ communities.</p>	<p>Comment noted. Section 3.12.3 of the FEIS was corrected to refer to the mitigation measures in Section 3.3 (Visual Resources), which would help mitigate potential adverse impacts to residences near the Project Site (including noise impacts). Treasury has proposed numerous EPMS and RCMs for air quality, noise, and traffic and transportation to manage potential impacts proactively. Please also refer to Response to Comment 14.</p>	Environmental Justice Mitigation Measures	Holly Simmons City of Greenbelt

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452	104	039	Additionally, to better understand impact to EJ communities, the DEIS should also consider the impact to BEP employees, some of whom are potentially members of EJ communities of concern elsewhere in the region. This would include those who are transit-reliant. The DEIS would benefit from a discussion of impacts to employees who will work in the CPF and also come from low-income households, 0-1 car households, minorities, and persons with disabilities. Opportunities to provide mitigation in the form of promoting and enhancing alternative modes of transportation, which may also serve to alleviate traffic and air quality issues proposed to impact EJ communities in the area surrounding the BARC site, should be more fully explored in the DEIS. This could include installation of the planned bicycle lanes on Powder Mill Road connecting to Edmonston Road, as well as bicycle lanes along the new entry road to the facility; sidewalks from the nearest bus stop to the facility; bicycle parking and storage lockers; and shower and locker facilities in the CPF.	Comment noted. Treasury seeks to implement the Proposed Action in the NCR in order to retain the existing BEP workforce. The BEP does not collect data on the EJ status of its employees. Additionally, inclusion of bicycle, pedestrian, and public transit amenities in the design of the Preferred Alternative is included as potential mitigation for Traffic and Transportation (see Section 3.10.3 of the EIS). No change made to the FEIS.	Environmental Justice Mitigation Measures	Holly Simmons City of Greenbelt
453	36	044	Environmental JusticeAs the DEIS indicates, it appears that the ROI is an area of potential Environmental Justice (EJ) concern. We recommend that the FEIS more clearly assess the individual block groups within the ROI, in addition to summarizing the data at the ROI level. The ROI summary level data are important from a comparative baseline perspective, but it is also important to try to identify the smaller, potentially underrepresented communities that may be overlooked when assessing a wide area. For example, communities with high percentages of linguistic isolation are better identified at block group level. This type of assessment can help better tailor the community involvement and outreach strategy.	Comment noted. Treasury revised the EJ analysis following publication of the DEIS. Treasury originally prepared the socioeconomic and EJ analyses using the US Census Bureau’s 2018 ACS dataset, which was the best available data at the time. This dataset did not contain data at the block group level, which restricted Treasury’s ability to consider potential EJ impacts to individual communities near the Project Site. Since that time, new and more refined data for the EJ ROI has been published, allowing Treasury to refine, check the accuracy of, and confirm its previous findings. More current data, detailed at the block group level, has been included in Section 3.12 of the FEIS. While Treasury previously determined that the EJ ROI as a whole was not a community of concern with respect to low income, Treasury has now identified six specific block groups within the EJ ROI that may be considered EJ communities of concern with respect to low income; these block groups are also EJ communities of concern with respect to race. Treasury’s EJ impact analysis as presented in the DEIS remains accurate. According to EJSCREEN, communities in the EJ ROI generally have low percentages of linguistic isolation; the block groups containing the Project Site and the Vansville community north of the Project Site have 0-5% linguistic isolation.	Environmental Justice	Carrie Traver USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
Section 3.13 - Hazardous and Toxic Materials and Waste - General						
454	3	011	3) In addition to potential contamination of the BARC fields, the Patuxent Wildlife Refuge is adjacent, so that could very well be contaminated by environmental damage.	Comment noted. Treasury would contain and treat all hazardous materials and wastes, including any potential accidental releases thereof, in accordance with applicable regulations. The Patuxent Wildlife Research Center is outside the HTMW ROI and would not be impacted by potential accidental releases. No change made to the FEIS.	HTMW	Vijay Parameshwaran

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455	65	016	(Lines 2737-2738) This statement is misleading. Per the Final Environmental Condition of Property Report, the age of the existing buildings within the Project Site likely contain lead-based paint, PCBs, asbestos-containing materials (ACM), petroleum-related products, and mercury and PCBs in fluorescent lights and ballasts. Also present may be electrical waste in the form of electrical cabinets, microscopes, computers, and monitors; refrigerants in air conditioning units; and miscellaneous laboratory chemicals. Therefore, although the USDA does not use hazardous materials or generate hazardous waste at the Project Site, hazardous materials and/or hazardous waste are present on the Project Site. The environmental condition of the Project Site as it relates to hazardous and toxic materials and waste (HTMW) should be fully presented.	Comment noted. The HTMW associated with on-site buildings are referenced in the first paragraph of Section 3.13.1.3 and detailed in Table 2 in the Hazardous and Toxic Materials and Waste Technical Memorandum . No change made to the FEIS.	HTMW	Debbie McKinley
456	66	016	(Section 3.12.2.1) If pesticides, herbicides, and laboratory chemicals could potentially have been disposed of via the sanitary sewer, would not these substances be released to the surrounding soil as the sewer lines deteriorate? As the buildings deteriorate, would not these released substances potentially migrate into the storm and/or sanitary sewer systems and then into the surrounding soils as the lines deteriorate? The fate of the HTMW present within the project site should be addressed for completeness.	Comment noted. Section 3.13.2.1 of the FEIS acknowledges that HTMW contaminants may be released into the environment as the existing buildings continue to deteriorate, resulting in potential less-than-significant adverse impacts. No change made to the FEIS.	HTMW	Debbie McKinley
457	67	016	(Lines 2749-2752) The determination of a less-than-significant adverse impact is unclear. Treasury defined a significant adverse impact as one that would result in an increase in the potential for soil, surface water, or groundwater contamination within the ROI that could increase human health or ecological risk. The continued release of existing contaminants into the environment by deteriorating buildings would result in an increase in the concentration of these contaminants in soil, surface water, or groundwater above existing concentrations. Any increase in contaminant concentrations would in and of themselves increase in the potential for soil, surface water, or groundwater contamination. Additionally, any increase in contaminant concentrations would in and of themselves increase human health or ecological risk above those risks currently present. Given the foregoing, it is not clear why the continued disintegration of the existing buildings would not result in a significant adverse impact. Significant impacts cannot be ruled out because no information is provided on the volume of lead-based paint, ACM, and other HTMW present within the Project Site that could potentially be released. Thus, the possibility exists that projected future concentrations of contaminants in soil, surface water, and groundwater would result in a significant adverse impact. A reasoned basis for the determination of a less-than-significant-impact rather than a significant impact should be provided.	Comment noted. Section 3.13.2.1 of the FEIS was revised to include more information on this potential less-than-significant impact under the No Action Alternative.	HTMW	Debbie McKinley
458	1	024	Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and maintained in accordance with applicable State and federal laws and regulations. Underground storage tanks must be registered and the installation must be conducted and performed by a contractor certified to install underground storage tanks by the Land and Materials Administration in accordance with COMAR 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.	Comment noted. Treasury would comply with all federal and state HTMW laws and regulations. No change made to the FEIS.	HTMW	c/o Sylvia Mosser MDE

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459	2	024	If the proposed project involves demolition – Any above ground or underground petroleum storage tanks that may be on site must have contents and tanks along with any contamination removed. Please contact the Oil Control Program at (410) 537-3442 for additional information.	Comment noted. Treasury would comply with all federal and state HTMW laws and regulations. No change made to the FEIS.	HTMW	c/o Sylvia Mosser MDE
460	3	024	Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3315 for additional information regarding solid waste activities and contact the Resource Management Program at (410) 537-3314 for additional information regarding recycling activities.	Comment noted. Solid waste generated during demolition and construction would be disposed of and/or recycled appropriately and in compliance with federal and state regulations. No change made to the FEIS.	HTMW	c/o Sylvia Mosser MDE
461	4	024	The Resource Management Program should be contacted directly at (410) 537-3314 by those facilities which generate or propose to generate or handle hazardous wastes to ensure these activities are being conducted in compliance with applicable State and federal laws and regulations. The Program should also be contacted prior to construction activities to ensure that the treatment, storage or disposal of hazardous wastes and low-level radioactive wastes at the facility will be conducted in compliance with applicable State and federal laws and regulations.	Comment noted. Table 2.2-1 was revised to include a HTMW Pre-Construction EPM/RCM to consult with State authorities to ensure proper management of HTMW during all phases of the Proposed Action.	HTMW	c/o Sylvia Mosser MDE
462	5	024	The proposed project may involve rehabilitation, redevelopment, revitalization, or property acquisition of commercial, industrial property. Accordingly, MDE's Brownfields Site Assessment and Voluntary Cleanup Programs (VCP) may provide valuable assistance to you in this project. These programs involve environmental site assessment in accordance with accepted industry and financial institution standards for property transfer. For specific information about these programs and eligibility, please contact the Land Restoration Program at (410) 537-3437.	Comment noted. While Phase I and II Environmental Site Assessments have already been completed for this Project Site, Treasury appreciates the suggestion and will review the referenced program for potential project assistance. No change made to the FEIS.	HTMW	c/o Sylvia Mosser MDE
463	118	039	XXIII. Operational History of Existing Facility Comments submitted by the City of Greenbelt during the public scoping period requested that the DEIS include the "Operational history of the current BEP facility, including researching violations and enforcement issues." For the DEIS, project site investigations were conducted to characterize the environmental conditions of the project site and identify Hazardous and Toxic Materials and Waste (HTMW) resulting from past activities conducted within 0.25 miles of the project site (the ROI for HTMW), but it appears that no equivalent investigations were conducted for the current BEP facility. The associated Technical Memorandum states only that "To determine potential HTMW impacts, Treasury analyzed the existing conditions at the Proposed Site through site investigations". No information regarding past violations and enforcement issues at the current BEP facility has been provided. The DEIS must be amended to include this information.	Comment noted. The operational history of the existing DC Facility is not relevant to the Proposed Action. Treasury would comply with all laws, regulations, and permits applicable to the Proposed Action. No change made to the FEIS.	HTMW	Holly Simmons City of Greenbelt

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Section 3.13 - Hazardous and Toxic Materials and Waste - Procedures							
464	29	016	(Table 2.2-1, Hazardous and Toxic Materials) For completeness, the specific BMPs that will be employed to minimize impacts from accidental releases or potential discharge of Hazardous and Toxic Materials and Waste (HTMW) should be identified.	Please refer to the Master Response provided under "Hazardous and Toxic Materials and Waste Procedures" in Section 9.0 of the FEIS.	HTMW Environmental Impact Reduction	Debbie McKinley	
465	30	016	(Table 2.2-1, Hazardous and Toxic Materials and Waste, Construction) For completeness, the specific BMPs and RCMs associated with spill and leak prevention and response procedures should be identified.	Please refer to the Master Response provided under "Hazardous and Toxic Materials and Waste Procedures" in Section 9.0 of the FEIS.	HTMW Environmental Impact Reduction	Debbie McKinley	
466	33	016	(Table 2.2-1, Hazardous and Toxic Materials and Waste, Operation) For completeness, the specific BMPs that will be employed to minimize impacts from accidental releases or potential discharge of HTMW should be identified.	Please refer to the Master Response provided under "Hazardous and Toxic Materials and Waste Procedures" in Section 9.0 of the FEIS.	HTMW Environmental Impact Reduction	Debbie McKinley	
467	34	016	(Table 2.2-1, Hazardous and Toxic Materials and Waste, Operation) For completeness, the spill and leak prevention and response BMPs and RCMs that will be employed over the life of the project should be addressed.	Please refer to the Master Response provided under "Hazardous and Toxic Materials and Waste Procedures" in Section 9.0 of the FEIS.	HTMW Environmental Impact Reduction	Debbie McKinley	
468	35	016	(Table 2.2-1, Hazardous and Toxic Materials and Waste, Operation) For completeness, the release reporting and clean up BMPs and RCMs that will be implemented over the life of the project should be addressed.	Please refer to the Master Response provided under "Hazardous and Toxic Materials and Waste Procedures" in Section 9.0 of the FEIS.	HTMW Environmental Impact Reduction	Debbie McKinley	
469	36	016	(Table 2.2-1, Hazardous and Toxic Materials and Waste, Operation) For completeness, the HTMW transportation and disposal BMPs and RCMs that will be implemented over the life of the project should be addressed.	Please refer to the Master Response provided under "Hazardous and Toxic Materials and Waste Procedures" in Section 9.0 of the FEIS.	HTMW Environmental Impact Reduction	Debbie McKinley	
470	33	044	Hazardous Wastes and Waste and Pollution Prevention As the site plan is developed, we recommend further detail regarding hazardous waste handling be added to the Technical Memorandum, including: operational controls and plans to prevent and address potential discharges or spills during operation of the facility; training given to personnel involved in operations that involve use, storage, transport of toxic substances; and offsite treatment and disposal locations. It is important that the public have the opportunity to review pollution prevention planning, compliance with federal and state regulations, and other steps to protect human health and the environment. We recommend the FEIS specify the documents that will be available to the public and anticipated communication to notify neighbors of project developments and receive public input.	Please refer to the Master Response provided under "Hazardous and Toxic Materials and Waste Procedures" in Section 9.0 of the FEIS. Treasury typically does not publish its HTMW plans or protocols.	HTMW	Carrie Traver	USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment

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471	17	048	Hazardous Materials Storage and Disposal. The Draft EIS highlighted that the new facility will both store and dispose of hazardous materials. "The potential for accidental releases of HTMW would have less-than-significant adverse impacts" with the only mitigation being compliance with existing codes and regulations. This fails to account for the impact of toxic materials impacting pristine ground waters and impacts on air quality. This section of the report appeared to be proforma with no analysis of the impact of spills and releases on the existing environment, impact on agricultural research and the Department of Agriculture workforce, and the impact to adjacent residents.	Please refer to the Master Response provided under "Hazardous and Toxic Materials and Waste Procedures" in Section 9.0 of the FEIS.	HTMW	Thomas E. Dernoga c/o Michelle Garcia Prince George's County Council
472	3	052	Section 3.1.3. There is no discussion of the extent of fuel storage on site and whether an SPC Plan may be required for the Preferred Alternative as required under the Federal Oil Pollution Act.	Please refer to the Master Response provided under "Hazardous and Toxic Materials and Waste Procedures" in Section 9.0 of the FEIS.	HTMW	Kobe Ramirez c/o Julian Grauer Environmental Review, Inc.
Section 3.14 - Human Health and Safety						
473	69	016	(Section 3.14.2.1.) No discussion is provided regarding how the continued deterioration of the BARC buildings within the Project Site and the presence of hazardous materials and/or substances in these buildings could pose a potential human health and safety risks. The populations (e.g., maintenance workers, security personnel) that would be potentially exposed to hazardous substances and physical hazards as the buildings deteriorate are not identified. The means by which these populations may be exposed to both chemical (inhalation, direct contact, etc.) and physical hazards (e.g., maintaining the building structure and maintaining security) are not identified. In considering health and safety risks at other deteriorating buildings on BARC, BARC determined that the safety, security, and maintenance risks would be substantial. BARC also determined that the deteriorating buildings pose a safety and health risk to workers due to their structural condition and the presence of potentially hazardous materials and that these building conditions would make maintaining security on BARC (see the Demolition of 22 Buildings at the Henry A. Wallace Beltsville Agricultural Research Center, ARS 2020). A discussion of how the continued deterioration of the BARC buildings within the Project Site and the presence of hazardous materials and/or substances in these buildings could pose a potential human health and safety risks should be presented for completeness.	Comment noted. Section 3.14.2.1 of the FEIS was revised to address potential human health and safety impacts to BARC employees under the No Action Alternative.	Human Health and Safety HTMW	Debbie McKinley
Section 4.0 - Cumulative Effects						
474	6	010	It analyzes the project in isolation, not in the context of other planned and likely development projects and proposes mitigation that address only the effects of this project. This does not evaluate the overall impact of changing what is currently a rural area into an industrial area particularly with regard to traffic and transportation.	Comment noted. The Cumulative Effects analysis in Section 4.0 of the FEIS (and accompanying Cumulative Effects Analysis Technical Memorandum) considers proposed future projects that would occur within the designated ROI for each resource area. With regard to Traffic and Transportation, the Transportation Impact Study that Treasury conducted for this Proposed Action analyzed the potential effects of both the Preferred Alternative and general regional growth of the area unrelated to the Proposed Action. No change made to the FEIS.	Cumulative Effects Traffic and Transportation	Carolyn Mitchell

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475	111	039	<p>XX. Cumulative Effects</p> <p>The assessment of Cumulative Effects is insufficient. The Cumulative Effects Technical Memorandum includes a list of projects in and around BARC, but the analysis of cumulative effects included in the DEIS appears to have been conducted from the perspective of the proposed action. Per the Council on Environmental Quality’s (CEQ) Considering Cumulative Effects Under the National Environmental Policy Act, which is listed as an applicable guidance and regulation document in the Technical Memorandum, “Cumulative effects need to be analyzed in terms of the specific resource, ecosystem, and human community being affected. [...] Analyzing cumulative effects requires focusing on the resource, ecosystem, and human community that may be affected and developing an adequate understanding of how the resources are susceptible to effects.” The methodologies used in the cumulative effects analysis for determining cause-and-effect relationships and their magnitude should be made clear in the DEIS. Any methodology used in the analysis should employ, as described in the CEQ guidance, “broad thinking about the interactions among the activities and resources that affect environmental change”.</p>	<p>Comment noted. The purpose of the Cumulative Effects analysis is to determine the Proposed Action's interrelationship with other actions that overlap in space and time. The Cumulative Effects analysis in Section 4.0 of the FEIS (and accompanying Cumulative Effects Analysis Technical Memorandum) was conducted in accordance with CEQ guidance and considers the incremental effects of the Proposed Action in conjunction with effects from other recent, ongoing, and reasonably foreseeable future actions on the same resources. The Cumulative Effects analysis investigates potential cumulative effects resulting from the Proposed Action on the natural and human environment. Methodology for assessing cumulative impacts is discussed in Sections 4.1 through 4.3 of the FEIS. Cumulative effects were determined by establishing an ROI and temporal scope, collecting data on past, present, and reasonably foreseeable future projects occurring within the ROI and timeframe, considering the effects of these past, present, and reasonably foreseeable future projects on resources within the ROI, and determining the cumulative impact resulting from the incremental effect of the Proposed Action taken into consideration with effects of past, present, and reasonably foreseeable future projects based on impact thresholds. No change made to the FEIS.</p>	Cumulative Effects	Holly Simmons	City of Greenbelt
476	112	039	<p>Additional analysis should be performed and justification provided for assessments pertaining to the cumulative effects of the Proposed Action and other past, present, and reasonably foreseeable future actions, particularly in terms of impact on the BARC Historic District, land use on BARC and on the surrounding community, wetlands and waterways (with particular consideration of impact to Beaver Dam Creek, Indian Creek, and impact to wetlands which falls below mitigation thresholds), wildlife and wildlife habitat (both terrestrial and aquatic), transportation, and climate change (including consideration of possible reductions in transit use and other alternative modes of travel due to project implementation), and adequate mitigation or impact-reduction measures should be proposed to address cumulative impacts of the Project. The City is particularly concerned about the proposed MAGLEV Project, the I-270 and I-495 Managed Lanes project (which was omitted from the list included in the Technical Memorandum), and the possible widening of MD-201 and the Beltway. The City of Greenbelt would be impacted by each of these projects and the total impact to the historic, cultural, and environmental resources in and around the city should be analyzed in the Project’s cumulative impact analysis.</p>	<p>The Cumulative Effects analysis comprehensively examines the Proposed Action's incremental effects when considered with impacts from other past, present, and proposed future projects within the ROI. These included commercial, residential, mixed-use, transportation, infrastructure, recreation, and institutional developments identified 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. The Cumulative Effects Analysis Technical Memorandum includes consideration of the BARC Historic District (Section 1.3.3.8 of the FEIS), land use (Section 1.3.3.1), water resources including wetlands (Section 1.3.3.6), wildlife and habitat (Section 1.3.3.7), transportation (Section 1.3.3.9), and climate change (Section 1.3.3.3). As noted in Sections 1.4 and 1.5, impact-reduction and mitigation measures proposed to address the Proposed Action's incremental impact on each resource area would further minimize the Proposed Action's contribution to cumulative impacts. The analysis has been updated to include consideration of the I-270 and I-495 Managed Lanes Study and additional information on the MD 201 Widening project (see Table 2 of the Cumulative Effects Analysis Technical Memorandum). Please also refer to Response to Comment 477 regarding the MAGLEV project.</p>	Cumulative Effects	Holly Simmons	City of Greenbelt

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477	39	044	Cumulative Effects We recommend that the discussion of cumulative effects (Chapter 4) include a narrative that clearly describes the expected effects from projects that are planned or likely at BARC, including the High-Speed Superconducting Magnetic Levitation System (MAGLEV) and the solar array development (Section 4.4). If MAGLEV facilities are located at BARC, a range of resources may be impacted. We suggest that the FEIS include updated information on anticipated projects, such as the planned MAGLEV corridor and maintenance yard and other reasonably foreseeable projects.	Potential impacts from past, present, and reasonably foreseeable future projects are discussed in Section 4.4.1 of the FEIS. Additional information has been incorporated into the Cumulative Effects analysis to include more recent information on actions proposed at BARC (see Table 2 and Sections 1.2.3.1, 1.3.3.7, and 1.3.3.8 of the Cumulative Effects Analysis Technical Memorandum). It is important to note the Cumulative Effects analysis aims to provide an appropriate assessment given the information available at the time of the assessment. Please refer to Response to Comment PM-17 for a discussion on the constraints of the cumulative analysis.	Cumulative Effects	Carrie Traver	USEPA Region 3 Office of Communities, Tribes, and Environmental Assessment
478	4	050	Compounding the inadequacy of the biological inventory is the omission of a major known proposed action in the cumulative effects analysis Section 4. That project is the MAGLEV high-speed rail, which would also run through the BARC as well as the adjacent Patuxent Refuge and would occupy a footprint of several hundred acres. The cumulative impact of these two projects together would be huge, greatly transforming the character of the BARC from one of the largest tracts of biologically diverse, undeveloped land in the region to that of an industrial zone. The draft EIS states that the action would displace wildlife and other biological resources, however, no mitigation is proposed. The EIS also says that significant impacts to EJ communities would result, and again no mitigation is proposed. There are majority African American and minority communities in nearby Greenbelt, MD that would be adversely impacted by this and by other proposed and existing projects, and these all must be taken into account when assessing proper mitigation measures.	The MAGLEV project was included in the cumulative impact analysis presented in the DEIS (see Table 2 of the Cumulative Effects Analysis Technical Memorandum). Please refer to Response to Comment 477 regarding the MAGLEV project; Table 2.2-1 and Section 3.8.3 of the FEIS regarding Treasury's updated biological resources EPMs, RCMs, and mitigation measures; and Response to Comment 14 regarding EJ mitigation measures. Please also note that the traffic and transportation mitigation measures identified in Section 3.10.3 would reduce potential significant adverse impacts to EJ communities to less-than-significant levels.	Cumulative Effects Mitigation Measures	Ross Geredien	
PM-17	2	50	I'm also concerned about your cumulative effects analysis. And it seems to be very lacking in any quantitative measures, particularly with respect to the amount of habitat that will be permanently lost in terms of the footprint of the project. Once that is gone, it is gone. There is no mitigation proposed for that habitat loss, and there's also no quantification of the amount of impermeable surface in the watershed with respect to other current and existing proposed projects, such as the MAGLEV. This is a known existing proposed project, and there's no mention of it here in the cumulative effects analysis.	The Cumulative Effects analysis uses quantifiable metrics to support its conclusions when feasible; however, the analysis is limited by the amount of publicly available information at the time on other past, present, and reasonably foreseeable projects. As such, to avoid speculation and rather appropriately assess potential cumulative effects, the total quantifiable impact (e.g., vegetation clearing, new impervious surfaces, and wetland impacts) that would result from the Proposed Action and all other considered actions cannot be adequately determined. Quantitative information for each project is included in its description in Table 2 of the Cumulative Effects Analysis Technical Memorandum , if available, and taken into consideration with the Proposed Action's quantitative impacts to provide conservative estimates and/or general conclusions regarding the Proposed Action's cumulative impact. Please also refer to Response to Comment 478.	Cumulative Effects	Ross Geredien	
Section 5.0 - Conclusions and Other Related Disclosures							
479	70	016	(Section 5.0) Any revisions made to previous sections in response to comments should be reflected in this section.	Comment noted. Revisions per other comments have been reflected in Section 5.0 of the FEIS, as applicable.	Conclusions	Debbie McKinley	

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Section 5.5 - Mitigation Identified						
480	121	039	Staff notes the distinction between measures that Treasury would conduct (EMPs, RCMs, and BMPs) and measures that Treasury may conduct (mitigation measures) as part of the Proposed Action. To eliminate uncertainty in the next iteration of this document, the DEIS should clearly state which "mitigation measures" Treasury would pursue with each alternative presented.	Comment noted. Treasury will identify in the ROD which mitigation measures it would implement if it selects the Preferred Alternative for implementation.	Mitigation Measures	Holly Simmons City of Greenbelt

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