

1.0 Topography and Soils

1.1 Introduction

This Technical Memorandum describes the topographic and soil resources in the Proposed Action's Region of Influence (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.

Topography refers to the general shape of the land surface and the height and position of natural environment features. Soil, in general, refers to unconsolidated materials overlying bedrock or other parent material. Soil structure, elasticity, strength, shrink-swell potential, and erodibility all determine the ability for the ground to support man-made structures. Soils typically are described in terms of their complex type, slope, physical characteristics, and relative compatibility or constraining properties to support a particular land use (e.g., development).

For the purposes of NEPA analyses, geology refers to the structure and configuration of subsurface features, and is described in terms of characteristic geomorphology, and subsurface rock types and structural elements. Potential impacts to geology typically include alterations to subsurface features that would affect seismic hazards, susceptibility to landslides, or migration of radon. As no excavation is proposed beyond 25 feet below ground surface (bgs), and based on available research regarding these geological subcomponents provided below, the Proposed Action would have **no potential** to impact geology.

- **Seismic Hazards:** While minor earthquakes do occasionally occur in Maryland, major seismic activity is unusual (MEMA, 2020). The Project Site is in a low seismic hazard area based on the [2018 Long-term National Seismic Hazard Map](#) (USGS, 2018). The proposed Currency Production Facility (CPF) would be constructed in accordance with applicable seismic reinforcement requirements.
- **Landslides:** Specific clay formations within the Potomac Group are associated with susceptibility to landslides (USGS, 1988). However, given the minor topography of the Project Site, there is no risk of a landslide.
- **Radon:** [Radon](#) is an odorless, colorless, and naturally occurring radioactive gas in Maryland. Major disturbances of soil can cause radon to migrate through the soil, through cracks in building foundations, and build up to unacceptable levels in indoor air. The Maryland Department of the Environment (MDE) and United States Environmental Protection Agency (USEPA) recommend mitigation if radon levels are at or above 4 picocuries per liter (pCi/L) (USEPA, 2016c). According to the [USEPA radon map for Maryland](#), the zip code containing the Project Site (20705) has an average radon level of 2.04 pCi/L (USEPA, 2016a). As such, the Proposed Action would not be expected to result in exposure of people to levels of radon that are greater than the acceptable levels.

Treasury received comments related to topography and soils from stakeholders during the public scoping period. Scoping comments expressed concern with soil erosion, the potential for contaminated soils, and the loss of agricultural land. The reader is referred to the [Hazardous and Toxic Materials and Waste Technical Memorandum](#) and the [Land Use Technical Memorandum](#) for information on potential soil contamination and the loss of agricultural land use, respectively. Please refer to Treasury's [Public Scoping Report](#) for further details on the comments received during the scoping period. Concerns expressed during public scoping regarding soil erosion impacts are considered and addressed in this analysis.

1.2 Affected Environment

1.2.1 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. As noted above, geology is not discussed further.

1.2.2 Applicable Guidance

Table 1 identifies federal and state guidance and regulations relevant to this analysis. Treasury would comply with these guidelines and requirements under the Proposed Action.

Table 1: Soil Resources Applicable Guidance and Regulations

Guidance/Regulation	Description/Applicability to Proposed Action
<p><u>Farmland Protection Policy Act (FPPA) of 1994 (59 Federal Register 116)</u></p>	<p>Designates 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 (NRCS, 2020b; NRCS, n.d.). Under the FPPA, farmland designated for this purpose does not have to be in active agriculture and may include forest and pasture lands; however, urban or built-up land is generally excluded.</p> <p>Where prime or unique farmland areas would be affected by a federal proposed action, the proponent prepares a Farmland Conversion Impact Rating Form (USDA Form AD-1006) for Natural Resources Conservation Service (NRCS) review and approval. Ratings are calculated based on site assessment criteria, such as the area's present use, distance from urban areas, and value as farmland. A rating under 160 points indicates that no further consideration for farmland protection is required; however, a rating of 160 points or more requires a higher level of consideration for protection (<u>7 Code of Federal Regulations [CFR] 658</u>).</p>
<p><u>Energy Independence and Security Act (EISA) of 2007 (42 USC 17094 et seq.)</u></p>	<p>Requires federal agencies to develop and redevelop facilities that exceed 5,000 square feet in a manner that maintains or restores stormwater runoff to pre-development conditions to the maximum extent technically feasible. The USEPA provides additional <u>guidance</u> on implementing <u>Section 438</u> stormwater runoff requirements (USEPA, 2009).</p>
<p><u>Maryland Erosion and Sediment Control Regulations (Code of Maryland Regulations 26-17-1)</u></p>	<p>Requires construction activities disturbing 1 or more acres of land to obtain coverage under the <u>General Permit for Stormwater Associated with Construction Activity</u>, including preparation of a site-specific Erosion and Sediment Control Plan (ESCP) and a Notice of Intent (NOI) pursuant to the federal National Pollutant Discharge Elimination System (NPDES). The ESCP sets forth Best Management Practices (BMPs) to limit erosion and sedimentation during construction and is subject to MDE review and approval (MDE, 2020).</p>
<p><u>Maryland Standards and Specifications for Soil Erosion and Sediment Control (2011)</u></p>	<p>Establishes MDE criteria for erosion and sediment control and guides developers to control sediment laden runoff from construction sites (MDE, 2011).</p>

Guidance/Regulation	Description/Applicability to Proposed Action
<p><u>Executive Order (EO) 13508, Chesapeake Bay Protection and Restoration (2009)</u></p>	<p>Directs federal agencies to make efforts to protect and restore the Chesapeake Bay, and to establish strategies to address water pollution coming from federal lands and facilities. Pursuant to this EO, the USEPA published its <u>Guidance for Federal Land Management in the Chesapeake Bay Watershed</u>, which applies to federal agencies with land, installations, or other management responsibilities affecting ten or more acres within the watershed (e.g., Beltsville Agricultural Research Center [BARC]), and provides methods to address nonpoint source pollution that are specific to different land categories. The chapter for <u>urban and suburban land</u> contains a list of strategies to minimize development impacts (USEPA, 2016b).</p>

1.2.3 Existing Conditions

1.2.3.1 Topography

The Project Site is relatively flat, generally ranging from 125 to 170 feet above mean sea level (see **Figure 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.

1.2.3.2 Soils

Figure 2 shows the soils underlying the Project Site. **Table 2** presents the characteristics of these soils. 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).

[As defined by the FPPA](#), the Project Site contains approximately 59.3 acres of prime farmland and 27.2 acres of farmland of statewide importance (see **Figure 2**); however, only 9.1 acres of prime farmland and 0.4 acre of farmland of statewide importance are currently used for agriculture (i.e., row crops; see the [Biological Resources Technical Memorandum](#)). The remaining portions of the Project Site with FPPA-designated soils consist of forest, open meadows, and, to a lesser extent, developed land (NRCS, 2020a). The Project Site contains no unique farmland or farmland of local importance.

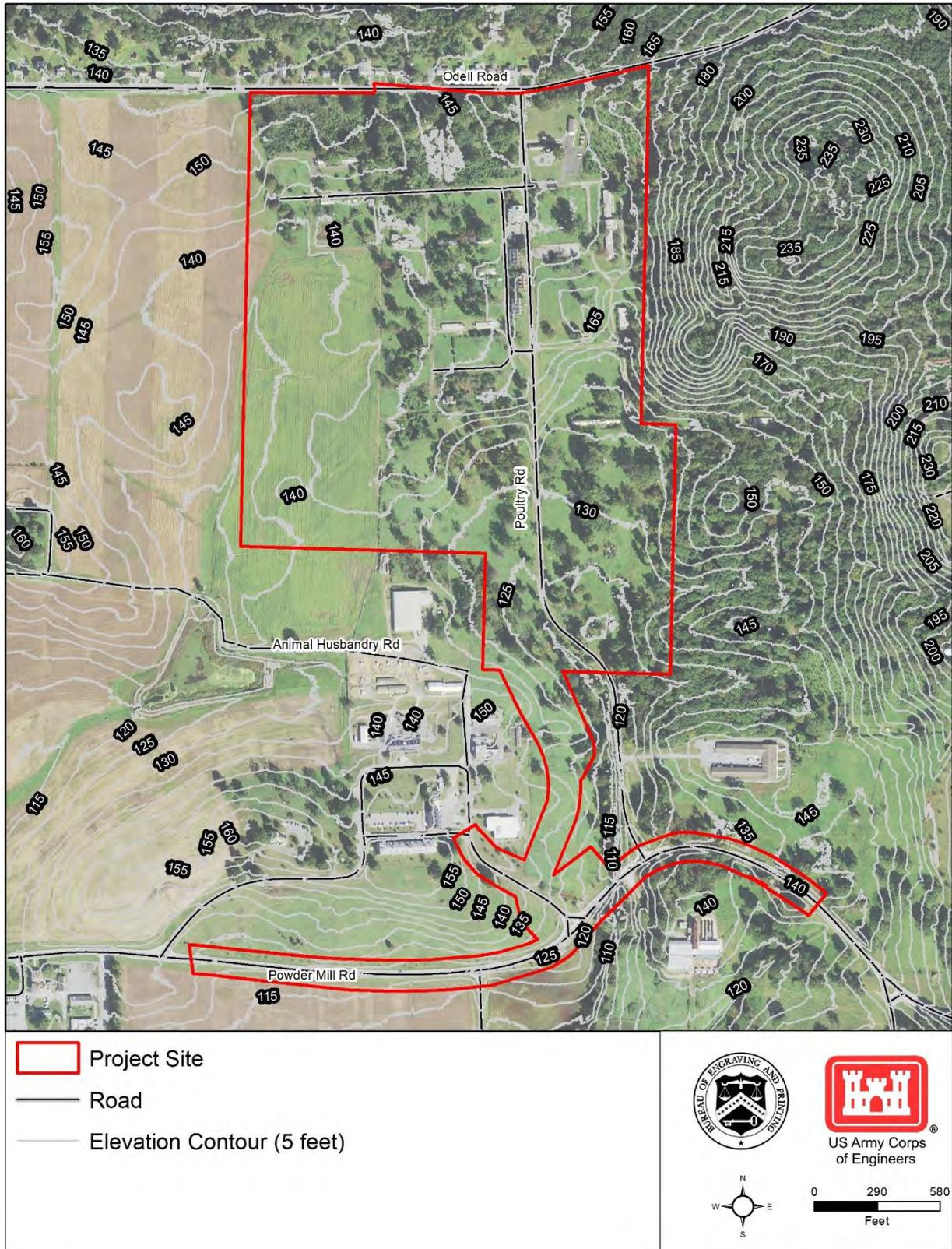


Figure 1: Project Site Topography

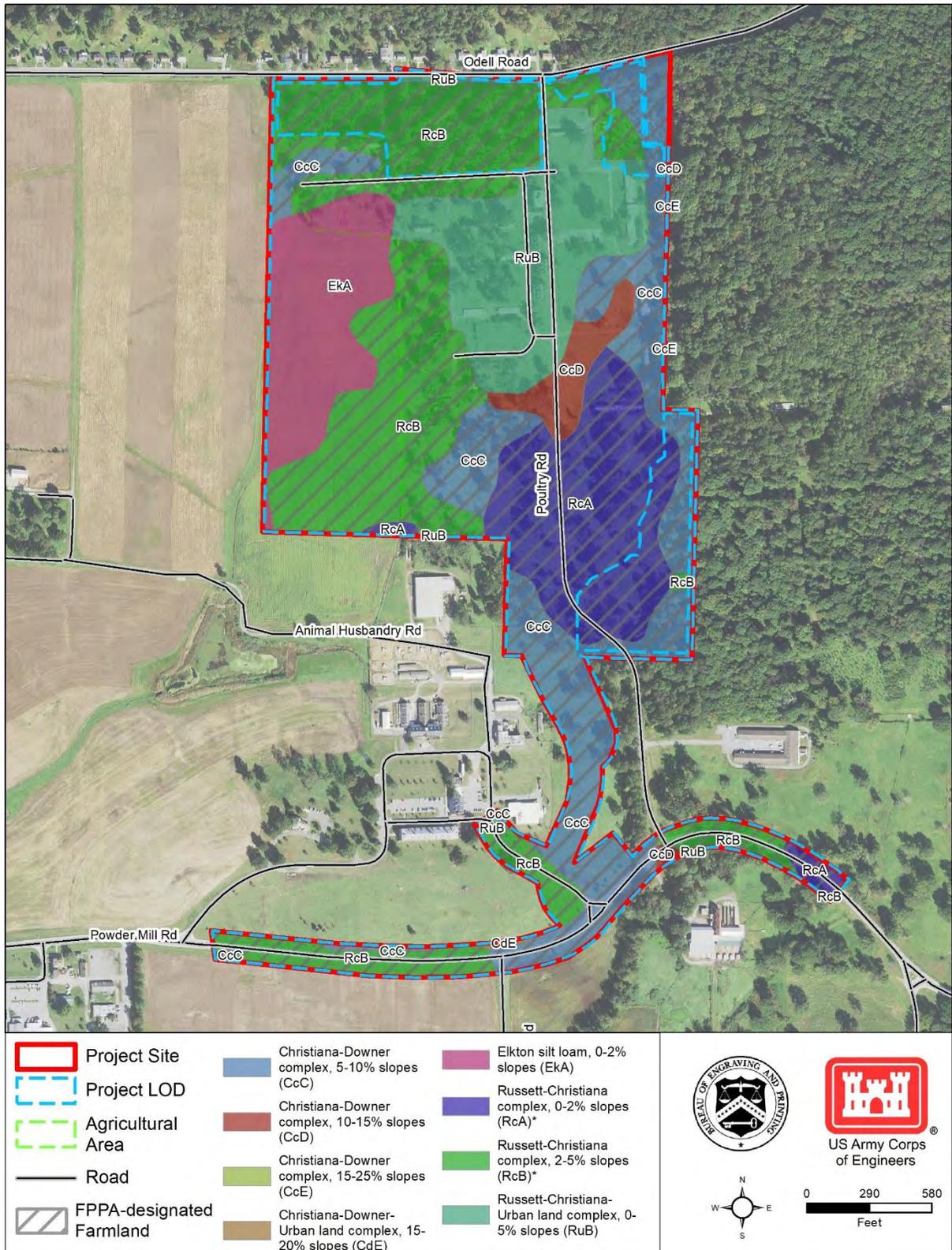


Figure 2: Project Site Soils

Table 2: Project Site Soil Characteristics

Soil Type	Acres in ROI	Acres in Limits of Disturbance (LOD)	Susceptibility to Compaction ¹	Hydric ²	K-Factor ³	Farmland Classification ⁴
Christiana-Downer complex, 5 to 10 percent slopes (CcC)	27.2	21.3	High	No	0.49	Farmland of Statewide Importance
Christiana-Downer complex, 10 to 15 percent slopes (CcD)	3.5	3.5	High	No	0.49	None
Christiana-Downer complex, 15 to 25 percent slopes (CcE)	0.1	0.1	High	No	0.49	None
Christiana-Downer-Urban land complex, 15 to 25 percent slopes (CdE)	0.1	0.1	High	No	0.49	None
Elkton silt loam, 0 to 2 percent slopes (EkA)	12.7	13.0	Medium	Yes	0.43	None
Russett-Christiana complex, 0 to 2 percent slopes (RcA)	19.0	15.0	Medium	No	0.28	Prime Farmland
Russett-Christiana complex, 2 to 5 percent slopes (RcB)	40.3	29.0	Medium	No	0.28	Prime Farmland

Soil Type	Acres in ROI	Acres in Limits of Disturbance (LOD)	Susceptibility to Compaction ¹	Hydric ²	K-Factor ³	Farmland Classification ⁴
Russett-Christiana-Urban land complex, 0 to 5 percent slopes (RuB)	19.2	18.3	Not Rated	No	N/A	None
Total	122.2	100.3	N/A	N/A	N/A	N/A

Errors in math due to rounding.

Source(s): (NRCS, 2020a; University of Maryland Extension, 2020)

1. Soil compaction occurs when soil particles are pressed together, reducing pore space between them. This can cause a loss or reduction in a soil's natural functions (e.g., water storage, infiltration, or filtration). Soil susceptibility to compaction depends on many factors, such as type (e.g., clay soils are more likely to compact than sandier soils), moisture content (i.e., wetter soils are more likely to compact than dry soils), and disturbance (i.e., when soils detach from plant materials and are exposed to load-bearing activities).
2. Hydric soils are saturated, flooded, or ponded with water during the growing season and develop anaerobic (oxygen-deprived) conditions in the upper soil. The presence of hydric soils is one potential indicator of wetland hydrology.
3. K-factor represents a soil's inherent susceptibility to erosion based on properties such as soil texture, organic matter, and permeability. K-factors range between 0.02 and 0.69, with lower values indicating lower erodibility. A K-factor exceeding 0.35 indicates a moderate to high potential for soil susceptibility to erosion.
4. [As defined by the FPPA](#), classifications include "prime farmland," "unique farmland," "farmland of statewide importance," and "farmland of local importance."

1.3 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. Measures to reduce potential adverse effects on soils from the Proposed Action are also identified.

1.3.1 Approach to the Analysis

For this analysis, Treasury defined a significant adverse impact as one that would result in:

- Substantial soil erosion, sedimentation, and/or compaction.
- A Farmland Conversion Impact Rating of 160 or greater.

1.3.2 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 the [Hazardous and Toxic Materials and Waste Technical Memorandum](#)).

1.3.3 Preferred Alternative

1.3.3.1 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 on the Project Site. 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.

1.3.3.2 Soils

Construction

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

Under the Preferred Alternative, existing vegetation would be removed within the LOD, rendering soils exposed and more susceptible to erosion. Ground disturbance would include grading and other earth-moving activities, as well as building demolition, all of which could increase soil erosion and sedimentation within the ROI. In addition, the operation of heavy equipment during demolition and construction activities could result in localized soil compaction.

In compliance with NPDES, Treasury would obtain coverage under MDE's *General Permit for Stormwater Associated with Construction Activity*; it would prepare a site-specific ESCP and submit an NOI to the MDE for review and public notification (see **Table 1**). The ESCP would contain site-specific BMPs for erosion and sediment control, soil compaction concerns, and stormwater management. Compliance with NPDES permit requirements (see **Section 1.4**) would minimize or eliminate these potential impacts, resulting in **no or negligible adverse impacts** to soils. The reader is referred to the [Water Resources Technical Memorandum](#) for further information on stormwater permitting.

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 green infrastructure/low impact development (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 could 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 apply conventional (e.g., approximately 4.3 acres of stormwater ponds) and GI/LID techniques to reduce, manage, and control stormwater on the Project Site

over the long term, retaining pre-development hydrology on the Project Site to the maximum extent technically feasible and minimizing water pollution, including from sedimentation (see the [Water Resources Technical Memorandum](#)).

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. No direct impact to soils would occur in the portions of the Project Site not included in the construction LOD (i.e., approximately 21.9 acres).

The Preferred Alternative would directly impact approximately 65.3 acres of FPPA-designated farmland soils (i.e., 44.0 acres of prime farmland and 21.3 acres of farmland of statewide importance) due to ground disturbance in the construction LOD. Further, approximately 21.2 acres of FPPA-designated farmland soils (i.e., 15.3 acres of prime farmland and 5.9 acres of farmland of statewide importance) 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.

Treasury completed a Farmland Conversion Impact Rating Form (USDA Form AD-1006) in consultation with the 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 (see **Table 1**), no further consideration for farmland conversion is required. **Appendix A** contains a copy of the current Farmland Conversion Impact Rating Form for the Preferred Alternative.

Finally, the state of Maryland, Prince George's County, and the National Capital Planning Commission 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 the [Land Use Technical Memorandum](#).

1.4 Impact-Reduction Measures

As part of the Proposed Action, Treasury would implement the following impact-reduction measures to minimize potential adverse impacts to soils:

Pre-Construction

- Obtain a *Maryland General Permit for Stormwater Associated with Construction Activity* to manage soil erosion, sedimentation, and compaction associated with construction of the Proposed Action. As more than 1 acre of land would be disturbed, Treasury would prepare a state-approved ESCP and submit an NOI to meet the requirements of the federal 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.

Construction

- Adhere to the site-specific ESCP and implement BMPs in accordance with the Manual for Erosion and Sediment Control in Maryland (MDE, 2011).

Operation

- 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.

1.5 Mitigation Measures

No project-specific mitigation measures are recommended.

1.6 References

- MDE. (2011). *2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control*. Retrieved January 31, 2020, from <https://mde.state.md.us/programs/Water/StormwaterManagementProgram/Documents/2011%20MD%20Standard%20and%20Specifications%20for%20Soil%20Erosion%20and%20Sediment%20Control.pdf>
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- MEMA. (2020). *Earthquakes*. Retrieved January 29, 2020, from <https://memm.maryland.gov/Pages/resources-Earthquakes.aspx>
- NRCS. (2020a). *Custom Soil Resource Report for Prince George's County, Maryland, BEP CPF Updated Site Boundary*.
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- NRCS. (n.d.). *Soil Data Access Prime and other Important Farmlands*. Retrieved January 30, 2020, from https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcseprd1338623.html
- University of Maryland Extension. (2020). *Home and Garden Center*. Retrieved March 5, 2020, from Compacted Soil: <https://extension.umd.edu/hgic/topics/compacted-soil>
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- USGS. (1988). *Map showing landslide susceptibility in Maryland*. Retrieved January 29, 2020, from <https://pubs.er.usgs.gov/publication/mf2048>
- USGS. (2018). *National Seismic Hazards Map*. Retrieved January 30, 2020, from <https://prd-wret.s3-us-west-2.amazonaws.com/assets/palladium/production/s3fs-public/thumbnails/image/2018nshmlongterm.jpg>

Appendix A: Farmland Conversion Impact Rating Form

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FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)		Date Of Land Evaluation Request			
Name of Project		Federal Agency Involved			
Proposed Land Use		County and State			
PART II (To be completed by NRCS)		Date Request Received By NRCS		Person Completing Form:	
Does the site contain Prime, Unique, Statewide or Local Important Farmland? <i>(If no, the FPPA does not apply - do not complete additional parts of this form)</i>		YES <input type="checkbox"/>	NO <input type="checkbox"/>	Acres Irrigated	Average Farm Size
Major Crop(s)	Farmable Land In Govt. Jurisdiction Acres: %		Amount of Farmland As Defined in FPPA Acres: %		
Name of Land Evaluation System Used	Name of State or Local Site Assessment System		Date Land Evaluation Returned by NRCS		
PART III (To be completed by Federal Agency)		Alternative Site Rating			
		Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly					
B. Total Acres To Be Converted Indirectly					
C. Total Acres In Site					
PART IV (To be completed by NRCS) Land Evaluation Information					
A. Total Acres Prime And Unique Farmland					
B. Total Acres Statewide Important or Local Important Farmland					
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted					
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value					
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)					
PART VI (To be completed by Federal Agency) Site Assessment Criteria <i>(Criteria are explained in 7 CFR 658.5 b. For Corridor project use form NRCS-CPA-106)</i>		Maximum Points	Site A	Site B	Site C
1. Area In Non-urban Use		(15)			
2. Perimeter In Non-urban Use		(10)			
3. Percent Of Site Being Farmed		(20)			
4. Protection Provided By State and Local Government		(20)			
5. Distance From Urban Built-up Area		(15)			
6. Distance To Urban Support Services		(15)			
7. Size Of Present Farm Unit Compared To Average		(10)			
8. Creation Of Non-farmable Farmland		(10)			
9. Availability Of Farm Support Services		(5)			
10. On-Farm Investments		(20)			
11. Effects Of Conversion On Farm Support Services		(10)			
12. Compatibility With Existing Agricultural Use		(10)			
TOTAL SITE ASSESSMENT POINTS		160			
PART VII (To be completed by Federal Agency)					
Relative Value Of Farmland (From Part V)		100			
Total Site Assessment (From Part VI above or local site assessment)		160			
TOTAL POINTS (Total of above 2 lines)		260			
Site Selected:		Date Of Selection		Was A Local Site Assessment Used? YES <input type="checkbox"/> NO <input type="checkbox"/>	
Reason For Selection:					
Name of Federal agency representative completing this form:					Date:

(See Instructions on reverse side)

STEPS IN THE PROCESSING THE FARMLAND AND CONVERSION IMPACT RATING FORM

- Step 1 - Federal agencies (or Federally funded projects) involved in proposed projects that may convert farmland, as defined in the Farmland Protection Policy Act (FPPA) to nonagricultural uses, will initially complete Parts I and III of the form. For Corridor type projects, the Federal agency shall use form NRCS-CPA-106 in place of form AD-1006. The Land Evaluation and Site Assessment (LESA) process may also be accessed by visiting the FPPA website, <http://fppa.nrcs.usda.gov/lesa/>.
- Step 2 - Originator (Federal Agency) will send one original copy of the form together with appropriate scaled maps indicating location(s) of project site(s), to the Natural Resources Conservation Service (NRCS) local Field Office or USDA Service Center and retain a copy for their files. (NRCS has offices in most counties in the U.S. The USDA Office Information Locator may be found at http://offices.usda.gov/scripts/ndISAPI.dll/oip_public/USA_map, or the offices can usually be found in the Phone Book under U.S. Government, Department of Agriculture. A list of field offices is available from the NRCS State Conservationist and State Office in each State.)
- Step 3 - NRCS will, within 10 working days after receipt of the completed form, make a determination as to whether the site(s) of the proposed project contains prime, unique, statewide or local important farmland. (When a site visit or land evaluation system design is needed, NRCS will respond within 30 working days.
- Step 4 - For sites where farmland covered by the FPPA will be converted by the proposed project, NRCS will complete Parts II, IV and V of the form.
- Step 5 - NRCS will return the original copy of the form to the Federal agency involved in the project, and retain a file copy for NRCS records.
- Step 6 - The Federal agency involved in the proposed project will complete Parts VI and VII of the form and return the form with the final selected site to the servicing NRCS office.
- Step 7 - The Federal agency providing financial or technical assistance to the proposed project will make a determination as to whether the proposed conversion is consistent with the FPPA.

INSTRUCTIONS FOR COMPLETING THE FARMLAND CONVERSION IMPACT RATING FORM

(For Federal Agency)

Part I: When completing the "County and State" questions, list all the local governments that are responsible for local land use controls where site(s) are to be evaluated.

Part III: When completing item B (Total Acres To Be Converted Indirectly), include the following:

1. Acres not being directly converted but that would no longer be capable of being farmed after the conversion, because the conversion would restrict access to them or other major change in the ability to use the land for agriculture.
2. Acres planned to receive services from an infrastructure project as indicated in the project justification (e.g. highways, utilities planned build out capacity) that will cause a direct conversion.

Part VI: Do not complete Part VI using the standard format if a State or Local site assessment is used. With local and NRCS assistance, use the local Land Evaluation and Site Assessment (LESA).

1. Assign the maximum points for each site assessment criterion as shown in § 658.5(b) of CFR. In cases of corridor-type project such as transportation, power line and flood control, criteria #5 and #6 will not apply and will, be weighted zero, however, criterion #8 will be weighed a maximum of 25 points and criterion #11 a maximum of 25 points.
2. Federal agencies may assign relative weights among the 12 site assessment criteria other than those shown on the FPPA rule after submitting individual agency FPPA policy for review and comment to NRCS. In all cases where other weights are assigned, relative adjustments must be made to maintain the maximum total points at 160. For project sites where the total points equal or exceed 160, consider alternative actions, as appropriate, that could reduce adverse impacts (e.g. Alternative Sites, Modifications or Mitigation).

Part VII: In computing the "Total Site Assessment Points" where a State or local site assessment is used and the total maximum number of points is other than 160, convert the site assessment points to a base of 160.

Example: if the Site Assessment maximum is 200 points, and the alternative Site "A" is rated 180 points:

$$\frac{\text{Total points assigned Site A}}{\text{Maximum points possible}} = \frac{180}{200} \times 160 = 144 \text{ points for Site A}$$

For assistance in completing this form or FPPA process, contact the local NRCS Field Office or USDA Service Center.

NRCS employees, consult the FPPA Manual and/or policy for additional instructions to complete the AD-1006 form.