1.0 Visual Resources

1.1 Introduction

This Technical Memorandum describes visual resources in the Proposed Action's Region of Influence (ROI) and potential impacts from the Proposed Action (i.e., Preferred Alternative) and No Action Alternative. Measures to reduce potential adverse effects on visual resources from the Proposed Action are also identified.

Although visual quality is partly subjective, visual characteristics that often render an area less attractive include clashing or incoherent architectural elements; unorganized mixing of open and built spaces; and presence of abandoned, derelict, or poorly maintained buildings or yards. Actions that remedy or mitigate such characteristics generally improve visual quality. Changes in lighting conditions also affect the visual quality of an area by altering the viewer experience.

Treasury referred to the US General Services Administration (GSA) Public Building Service (PBS) National Environmental Policy Act (NEPA) Desk Guide while performing this visual resources impact analysis. 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 (GSA, 1999).

Treasury focused this analysis on visual quality from the perspective of accessible, public views located off-site. The Project Site would be void of any US Department of Agriculture (USDA) operations prior to the Proposed Action; therefore, visual quality from areas on-site is not analyzed. The reader is also referred to the ***Cultural Resources Technical Memorandum*** for additional information on visual resources in the context of architectural resources.

Treasury received comments related to visual quality from stakeholders during the public scoping period. These comments identified concern with the potential visual effects that could result from security features, lighting, structures, and vegetation removal.

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 visual quality are considered and addressed in this analysis.

1.2 Affected Environment

1.2.1 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. The ROI is depicted in **Figure 1**; it is generally bounded by Odell Road to the north, the Beltsville Agricultural Research Center (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 1** indicates "filtered" views, such as through trees.

To evaluate potential impacts on visual resources that could result from the Proposed Action (see **Section 1.3**), Treasury photo-documented six distinct viewpoints in the ROI. These viewpoints are also depicted in **Figure 1**.

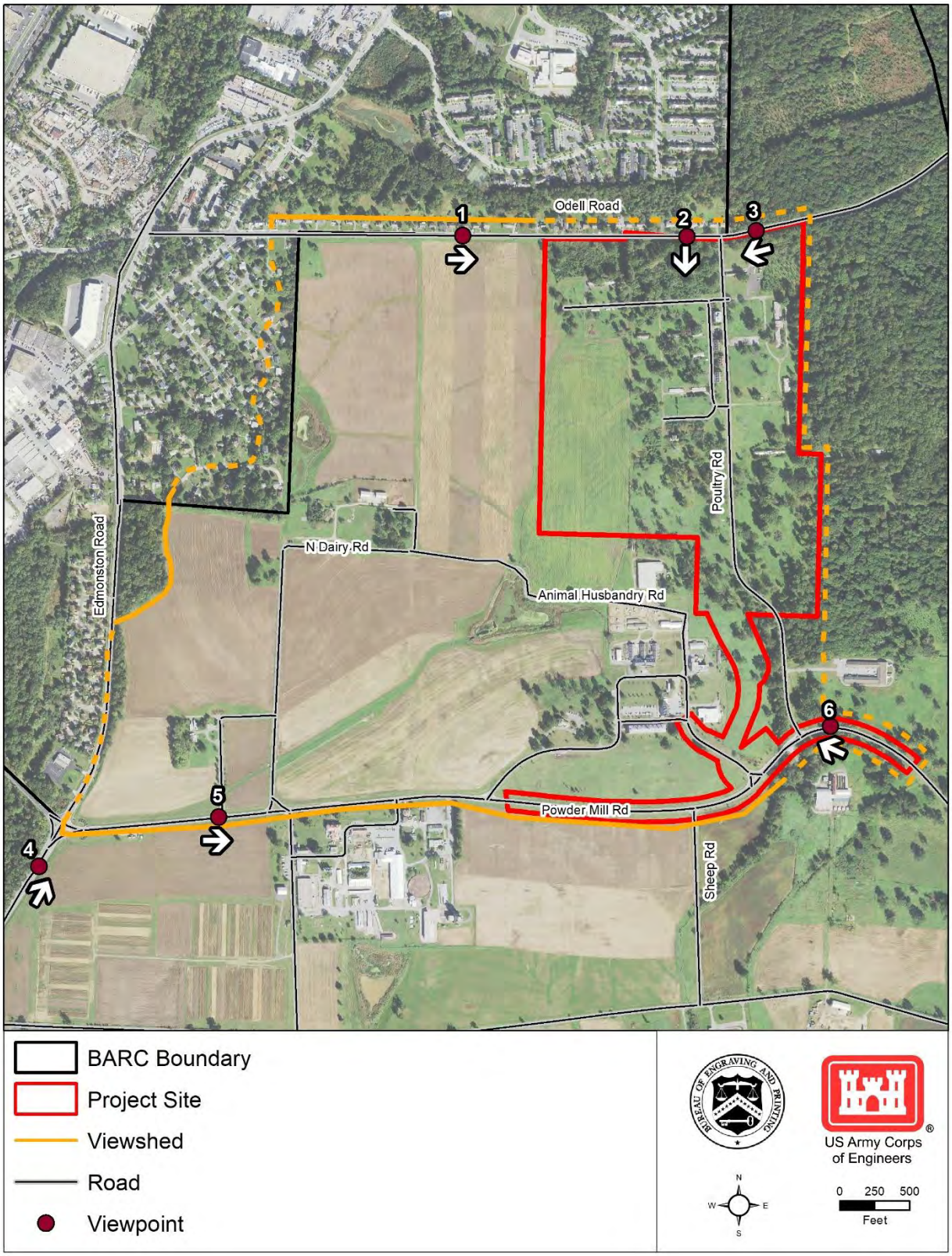

Figure 1: Visual Resources ROI

Due to a rise in topography south of the Project Site, it is possible that the proposed Currency Production Facility (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 **Section 1.1**, 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.

1.2.2 Applicable Guidance

Table 1 identifies federal and local guidance and regulations relevant to this analysis. Treasury considered these guidelines in developing and analyzing the Proposed Action.

Table 1: Visual Resources Applicable Guidance and Regulations

Guidance/Regulation	Description/Applicability to Proposed Action
Prince George's County, Maryland Code of Ordinances (Section 27-562)	Provides that adequate lighting shall be provided if the parking lot is to be used at night. The lighting shall be arranged so as not to reflect or glare on land used for residential purposes.
Prince George's County Master Plan of Transportation (M-NCPPC, 2009)	Sets forth development guidelines to conserve and protect designated scenic and historic features when undertaking roadway development. States the following with respect to development along scenic and historic roadways: • Proposed work adjacent to the right-of-way requires a scenic and historic features inventory. • Existing viewsheds shall be conserved and enhanced to the extent possible during development, including consideration of views of structures from the roadway; the design character and materials of constructed features; and preservation of natural environment features (e.g., vegetation, slope, and trees). The Master Plan of Transportation also recommends the use of scenic easements and development plans that limit the number of roadway access points.
US GSA PBS NEPA Desk Guide (GSA, 1999)	Provides guidance for conducting visual impact analyses for development in visually sensitive locations.

1.2.3 Existing Conditions

The overall visual landscape of the ROI is rural-suburban with mixed use development and open space. Developed land generally includes one- to five-story structures on BARC, along Odell Road, and to the west of BARC; most are set back from the roadways. Open space is interspersed with the built environment and includes wooded areas, open meadows with mature trees, agricultural fields, and lawns. The entirety of BARC (i.e., 6,582 acres) comprises the BARC Historic District, a historic property listed on the National Register of Historic Places (see the ***Cultural Resources Technical Memorandum***).

Visibility to the Project Site within the ROI is highly variable and, in many instances, seasonally affected by the presence of intervening deciduous plants.[1] The most prominent views of the Project Site occur along

[1] To show the Proposed Action's maximum visibility from off-site areas within the ROI, Treasury performed the visual resources analysis in the winter, during "leaf off" conditions. Views to the Project Site during spring, summer, and fall would be more limited than during the winter months.

short segments of Odell Road and Powder Mill Road. The Project Site is generally not visible from the northeast, east, and southeast due to adjacent forest vegetation.

1.2.3.1 Views from Roadways

The Prince George's County Master Plan of Transportation (see **Table 1**) classifies Powder Mill Road as a scenic byway sidetrack, and Powder Mill Road, Odell Road, and Edmonston Road as historic (M-NCPPC, 2009).

Odell Road

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. Please refer to Viewpoint 1 (see **Figure 2**), Viewpoint 2 (see **Figure 4**), and Viewpoint 3 (see **Figure 6**) for depictions of these areas.[2]

Visibility of the Project Site along Odell Road is most prominent eastbound as the road approaches the northern boundary of the site, overlooking agricultural fields (see **Figure 2**); however, this view is often obstructed at ground level by overgrown vegetation along the chain-link fence. The Project Site is minimally visible from Odell Road to the northeast due to forest vegetation (see **Figure 4**).

Edmonston Road

Views along Edmonston Road in the ROI are characterized by a small area of forest to the west and BARC to the east. The Project Site is minimally visible in the periphery while travelling northbound past the intersection of Edmonston Road and Beaver Dam Road, approximately 1.3 miles southwest of the Project Site. Intervening topography and a buffer of roadside trees largely obscure this view. Please refer to Viewpoint 4 (see **Figure 8**).

Powder Mill Road

Powder Mill Road is a public road that divides BARC's Central Farm from west to east. Views along this corridor in the ROI are characterized by the facilities, agricultural fields, and forestland associated with BARC's Central Farm area. Please refer to Viewpoint 5 (see **Figure 10**) and Viewpoint 6 (see **Figure 12**) for depictions of these areas.

The most prominent views of the Project Site from Powder Mill Road occur eastbound in the vicinity of its intersection with North Dairy Road (see **Figure 10**). The other eastbound views to the Project Site from Powder Mill Road are limited by terrain to the southwest and south, and forest to the southeast (see **Figure 12**).

1.2.3.2 Views from Residences

Views from approximately 34 residences along Odell Road are comparable to those described for the roadway itself (e.g., Viewpoint 1). In some cases, views from residences to the northwest and west of the Project Site have more expansive views of the BARC Historic District and the Project Site due to minimal or no forested buffer; these views are particularly prominent from second-story windows, although most homes on this road are single-story. Directly north of the Project Site (e.g., Viewpoint 3), residential views of the Project Site are primarily dominated by the existing forest conservation easements (see **Figure 4**).

[2] Please note that **Figure 2** through **Figure 13** as referenced in this Technical Memorandum are consolidated in **Appendix A**.

1.2.3.3 Lighting

Light emits from varying sources in the ROI including operational BARC facilities, street lights and residences along Odell Road, and vehicle headlights. Most sources of light are stationary and, with the exception of homes along Odell Road, set back substantially from the roadways. The ROI is also proximal to other large, undeveloped areas in the region. Relative to average conditions in the highly developed National Capital Region, light emitted in the ROI at night is minimal largely due to the vast open spaces associated with BARC's agricultural mission. Generally, lighting in the ROI does not cause glare.

1.3 Environmental Effects

This section identifies the potential effects on visual 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 visual resources effects from the Proposed Action are also identified.

1.3.1 Approach to Analysis

For this analysis, Treasury defined a significant adverse impact on visual resources as one that would:

- Introduce discordant elements or remove important (i.e., visually appealing) elements in a previously cohesive and valued viewscape.
- Obstruct historically or aesthetically valued vistas.
- Permanently alter the visual character or "sense of place" in the ROI.

To evaluate potential impacts on visual resources that could result from the Proposed Action, Treasury prepared a conceptual rendering that visualizes the potential appearance of the proposed CPF and new entrance road as compared to existing conditions at each of the six photo-documented viewpoints in the ROI. These renderings (see **Figure 3**, **Figure 5**, **Figure 7**, **Figure 9**, **Figure 11**, and **Figure 13**) represent potential typical views of the proposed CPF from rights-of-way where the public would be most likely to see the proposed CPF.

1.3.2 No Action Alternative

Under the No Action Alternative, Treasury would not construct or operate the proposed CPF. 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 at the Project Site would also continue.

1.3.3 Preferred Alternative

1.3.3.1 Views from Roadways and Residences

Construction

Construction of the Preferred Alternative would alter viewsheds in the ROI by removing existing built and natural features at the Project Site, including buildings, mature trees, and other vegetation. In some instances, views from roadways in the ROI would become less rural-suburban in character during construction.

Construction activities would be most visible from Odell Road; however, existing topography and roadside vegetation, including the proposed retained forested buffer in the northern portion of the Project Site (see the ***Biological Resources Technical Memorandum***) and the vegetation along BARC's boundary chain-

link fence adjacent to Odell Road, would generally obscure the Project Site from the peripheral view of motorists. Treasury would also install privacy fencing along Odell Road during construction to further minimize views of construction activities. Views of construction of the proposed CPF from Edmonston Road and Powder Mill Road would be minimal and very peripheral 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 traveling along Powder Mill Road; however, these views would be temporary and would be consistent with other views of roadway construction work that motorists frequently experience. Treasury would install privacy fencing around the entrance road construction area to minimize these views. Overall, there would be ***negligible adverse impacts*** to visual resources for motorists traveling through the ROI.

Residences along Odell Road, especially the few with second stories, could potentially have unobstructed views of construction activities for the duration of the construction phase (i.e., 4 to 5 years, or from approximately 2021 to 2025), although site disturbance would be concentrated in the first few years as construction activities gradually transition to internal facility preparation with minimal visual impacts (i.e., once the external shell of the proposed CPF is built). 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. 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 (i.e., an institutional setting, with historic buildings scattered among open meadows and mature trees) to a large manufacturing facility (i.e., an industrial setting). Consequently, the ROI would become less rural-suburban in character.

As during construction, the proposed CPF would be most visible from Odell Road due to its proximity to this road, although it would also be visible from Powder Mill Road eastbound and potentially from Edmonston Road northbound. In each case, the facility would be peripheral to the main field of view along these roads, and intermittently obscured by existing topography and vegetation. Further, while the ROI is generally rural-suburban in character, the ROI is located near other industrial settings; the proposed CPF would not be substantially out of character for motorists.

As shown in Treasury's conceptual renderings of the proposed CPF (see **Figure 3**, **Figure 5**, **Figure 7**, **Figure 9**, **Figure 11**, and **Figure 13**), it would not be a substantial feature on the landscape for motorists. It would be located on a portion of the Project Site that is approximately 10 feet lower in elevation than viewpoints in the ROI. The proposed CPF would also be designed in a manner consistent with Treasury's project-specific Memorandum of Agreement (MOA) or Programmatic Agreement (PA) for cultural resources to reduce potential adverse visual effects, if feasible, to the existing cohesive BARC landscape (e.g., by selecting building materials and colors consistent with the existing visual landscape). Treasury would also consider installing appropriate-height plantings along the fence line to add a more natural aesthetic. These design choices would also minimize the attention the proposed CPF draws from the public. Therefore, operation of the Preferred Alternative would result in ***less-than-significant adverse impacts*** on visual resources in the ROI from roadways.

Also similar to construction, operation of the Preferred Alternative would be more visible from the residences along Odell Road than from the roadways. Whereas these residences currently have views of the BARC Historic District with a cohesive, character-defining cultural landscape (although including many dilapidated

structures that could further fall into disrepair over time), introduction of the proposed CPF would obstruct the historically and aesthetically valued vista/viewscape from the residences 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). A single stoplight (or other traffic control device), however, would not be likely to substantially detract from the surrounding viewscape, and would result in ***negligible adverse impacts*** to visual resources along Powder Mill Road.

1.3.3.2 Lighting

Construction

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

Operation

The Preferred Alternative would include new external security and operational lighting sources in accordance with Interagency Security Committee (ISC) criteria that could be visible from nearby properties in the ROI, thereby increasing the amount of nighttime light in the ROI relative to existing conditions and creating the potential for glare. The proposed entrance road may be lit at night and could contribute to this increase in nighttime light. Treasury would minimize off-site light pollution through sensitive design of the proposed CPF to the extent feasible, including consideration of the International Dark-Sky Association's (IDA) 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 of the Preferred Alternative 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 measures listed in **Section 1.4**, 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 1.5** would further reduce the potential for adverse impacts to the observatory.

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 visual resources within the ROI:

- Design the proposed CPF in a manner consistent with Treasury's project-specific MOA or 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 IDA's 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.
- Install privacy fencing along Odell Road and the proposed entrance road during construction to further minimize view of construction activities.

1.5 Mitigation

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.

1.6 References

GSA. (1999). *National Environmental Policy Act NEPA Desk Guide.* Washington, DC: Public Building Service. Retrieved from https://www.gsa.gov/cdnstatic/PBS_NEPA_Deskguide.pdf

IDA. (n.d.). *Five Principles for Responsible Outdoor Lighting*. Retrieved from International Dark-Sky Association: https://www.darksky.org/our-work/lighting/lighting-principles/

M-NCPPC. (2009). *Approved Countywide Master Plan of Transportation.* Upper Marlboro, Maryland. Retrieved April 22, 2020, from https://www.mncppc.org/1156/Transportation-Plans

Appendix A: Conceptual Renderings of the Preferred Alternative in the ROI

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Figure 2: Viewpoint 1, Odell Road Eastbound, under Existing Conditions

Figure 3: Viewpoint 1, Odell Road Eastbound, under Preferred Alternative

Figure 4: Viewpoint 2, Odell Road Facing South, under Existing Conditions

Figure 5: Viewpoint 2, Odell Road Facing South, under Preferred Alternative

Figure 6: Viewpoint 3, Odell Road Westbound, under Existing Conditions

Figure 7: Viewpoint 3, Odell Road Westbound, under Preferred Alternative

Figure 8: Viewpoint 4, Edmonston Road Northbound, under Existing Conditions

Figure 9: Viewpoint 4, Edmonston Road Northbound, under Preferred Alternative

Figure 10: Viewpoint 5, Powder Mill Road Eastbound, under Existing Conditions

Figure 11: Viewpoint 5, Powder Mill Road Eastbound, under Preferred Alternative

Figure 12: Viewpoint 6, Powder Mill Road Westbound, under Existing Conditions

Figure 13: Viewpoint 6, Powder Mill Road Westbound, under Preferred Alternative