

Ms. Carrie Ozgar  
Attn.: BEP EA  
U.S. Army Corps of Engineers  
Baltimore District Planning Division  
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Baltimore, MD 21201

**Sent Via E-mail ONLY to:** [BEP-Updates@usace.army.mil](mailto:BEP-Updates@usace.army.mil)

June 21, 2024

Re: The Sierra Club Maryland Chapter's Comments on the Draft Supplemental Environmental Assessment for the Bureau of Engraving and Printing's Replacement Currency Production Facility

Dear Carrie Ozgar:

The Sierra Club Maryland Chapter (Sierra Club) is pleased to provide the following comments on the U.S. Army Corps of Engineers' Draft Supplemental Environmental Assessment for traffic and utility mitigation work for the U.S. Department of Treasury's Currency Production Facility, proposed for the Beltsville Agricultural Research Center (BARC) in Beltsville, Maryland (hereinafter, Draft EA).

Sierra Club's mission is to explore, enjoy, and protect the earth's wild places; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environment. In furtherance of that mission, Sierra Club works to educate the public about the climate emergency and to advocate for bold systemic changes at the local and Maryland state level to promote a just and equitable transition away from fossil fuels and to protect air, water, land, and wildlife for future generations. The Sierra Club has approximately 12,000 members in Maryland, including in the vicinity of the proposed Currency Production Facility (CPF) currently planned to be located on BARC land and impacting locally valued resources. Therefore, we are reviewing project documents, listening to stakeholders, and commenting on the project on behalf of Sierra Club members and several other groups active in Prince George's County, Maryland.

**1. The Agencies Must Prepare a Supplemental Environmental Impact Statement.**

The current Draft EA only supplements the Final Environmental Impact Statement for the CPF (EIS) with an analysis of the anticipated environmental impacts from the proposed utility and traffic mitigation related to the CPF rather than addressing the full scope of the environmental impacts that would occur from construction and operation of the CPF together with the utility and traffic mitigation projects. The Draft EA admits that under its no action alternative, the CPF would be constructed but "this alternative would not allow roadway and utility improvements needed to mitigate traffic and utility impacts from the operation of the new CPF." Draft EA at 2-4. A true no action alternative uses a baseline of not building and operating the CPF.

The Corps' choice to prepare only a supplemental EA means the public does not have the full information necessary to understand the environmental impacts of the CPF project. The Corps must withdraw the Draft EA and instead prepare a supplemental EIS that cumulatively evaluates the anticipated impacts from all these proposed actions.

## **2. The Draft EA Fails to Address Multiple Environmental Impacts.**

As other commenters explained to the Corps and the U.S. Department of the Treasury (Treasury), including the City of Greenbelt, the final EIS released in 2021 for the CPF was deficient for multiple reasons, including a failure to address impacts to environmental justice, air quality, traffic, and surface water quality, among others. Unfortunately, the Draft EA does not sufficiently analyze the environmental impacts of the proposed utility and traffic mitigation or evaluate the cumulative impacts of that work and the impacts of the CPF. Those deficiencies must be remedied. Other impacts that require more analysis include:

### **a. Air quality emissions and related health impacts.**

The Draft EA addresses air quality impacts from the traffic and utility mitigation work only, when a supplemental EIS for both the CPF and the traffic and utility mitigation work is needed as noted earlier in this comment letter. Likewise, the Corps should not separately estimate air emissions of the same pollutants from all aspects of the proposed work. Instead, it must clearly describe when these additional air emissions will occur from CPF construction and operation and from the traffic and utilities mitigation work. For example, emissions of harmful criteria air pollutants from the traffic and utilities mitigation work are estimated for 2027-28 whereas the EIS estimates emissions from the same pollutants from construction of the CPF ending in 2025, which is an outdated timeline. Not combining pollution from both of these aspects of the project is misleading to the public. The draft FONSI's claim that air emissions would be negligible or less than significant cannot be made without further providing this information.

Like the EIS, the Draft EA does not analyze localized human health harms from these air quality emissions because the Corps claims that the estimated annual emissions are below regulatory thresholds so it does not present any further analysis. Draft EA at 4-11 to 4-12, 4-14 to 4-16; FEIS Air Quality Technical Memorandum at 12-13, 16. This violates NEPA and must be reexamined.

Sierra Club is particularly concerned about impacts to the local community and students and teachers at the nearby Vansville Elementary School. The Corps must disclose to the public when the CPF construction emissions will be released and how those emissions combined with the emissions from the traffic and utility construction compare to regulatory thresholds. Importantly, the Corps must evaluate how the air emissions impact local public health compared to a baseline of not building in that location.<sup>1</sup>

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<sup>1</sup> Impacts from these pollutants are linear, occurring at levels below the NAAQS. *See, e.g.*, EPA, Reconsideration of the NAAQS for PM, 89 Fed. Reg. 16,202 (March 6, 2024).

- As others have noted the EIS's PM<sub>10</sub> emission projections are projected to be identical or nearly identical to the smaller PM<sub>2.5</sub> emissions, EIS at 3-19, 3-20, but this assumption is unsupported. Moreover, the Draft EA estimates the traffic and utilities construction will cause 25 to 34 times more PM<sub>10</sub> emissions than the demolition, grading, and construction of the Facility and parking lot, despite the scale of the work being smaller. *Compare id. with* Draft EA at 4-14 and 4-15. The Facility's PM<sub>2.5</sub> and PM<sub>10</sub> emissions must be reevaluated and combined with the traffic and utility mitigation emissions, and the human health impacts of those total emissions must be evaluated.
- The final EA (or as noted above, final supplemental EIS) should include updated ambient air monitoring station measurements from nearby monitors for 2023, compared to the NAAQS, *see* FEIS Air Quality Technical Memorandum at 8, and also disclose what health impacts could be expected at those concentrations.
- The final EA must include anticipated air quality impacts together with the proposed CPF's air quality impacts.

While the draft EA claims there is a less than significant cumulative air quality impact, it is not possible to make such a determination without evaluating the above issues. The Corps has not disclosed the cumulative air impacts because it has not looked at the full air emissions.

**b. Climate change impacts.**

Council on Environmental Quality ("CEQ") climate change guidance encourages agencies to properly address and quantify greenhouse gas emissions. The Corps should follow this guidance. The Corps should likewise quantify the costs of total greenhouse gas emissions from the combined CPF and traffic and utilities mitigation work based on EPA's Report on the Social Cost of Greenhouse Gases: Estimate Incorporating Recent Scientific Advances.<sup>2</sup> Those costs should be shared with the public and decisionmakers and taken into account in decision making.

Moreover, the Corps must evaluate the impacts of the CPF and the traffic and utilities mitigation work compared to existing State, Tribal, or local adaptation plans.<sup>3</sup> For example, as part of its plans to reduce greenhouse gas emissions, Maryland Department of Transportation is updating its bicycle and pedestrian master plan,<sup>4</sup> and that plan must be considered when proposing changes to roadways. Similarly, the EIS and Draft EA should, but do not, discuss how local adaptation plans may be adversely impacted by the proposed increases in impervious surfaces.

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<sup>2</sup> EPA, Report on the Social Cost of Greenhouse Gases: Estimate Incorporating Recent Scientific Advances, *available at* [https://www.epa.gov/system/files/documents/2023-12/epa\\_scghg\\_2023\\_report\\_final.pdf](https://www.epa.gov/system/files/documents/2023-12/epa_scghg_2023_report_final.pdf).

<sup>3</sup> *Id.* at 1208.

<sup>4</sup> Statewide Bicycle and Pedestrian Master Plan, <https://www.2050marylandbpmp.com/>.

In April 2024, the federal government issued a final rule on building energy performance for federal buildings.<sup>5</sup> The current federal standards for building energy performance require buildings to be designed in 2025 to have a 90% reduction in fossil fuel-generated energy consumption compared to a similar building in 2003.<sup>6</sup> This also is consistent with the State of Maryland's plans to phase out fossil fuel use in large buildings over 35,000 sq ft and have them achieve net zero direct emissions by 2040.<sup>7</sup> Although the proposed CPF is not covered by the state's building energy performance standards, the Corps and Treasury should ensure that the proposed CPF serves as a model for Maryland and is designed in consideration of federal and state standards, to reduce its energy consumption and its climate footprint.

In addition, the Corps and Treasury should commit to providing electric car charging stations at the CPF parking lot to encourage further electrification in addition to the 16 stalls proposed in materials made available by the National Capital Planning Commission in October 2023.<sup>8</sup> Maryland has a goal to develop electric vehicle (EV) "alternative fuel corridors," by placing two public charging stations capable of charging four EVs simultaneously no more than 50 miles apart.<sup>9</sup> The CPF should help Maryland exceed this goal by either creating public charging stations outside the security perimeter of the CPF or by subsidizing public EV charging stations nearby.

**c. Water quality impacts.**

The Draft EA reveals a significant change since the EIS. The Corps and Treasury now propose to discharge 120,000 gallons per day of wastewater through the Blue Plains Wastewater Treatment Plant ("WWTP") and then to the Potomac River, instead of discharging that wastewater through the BARC East WWTP and then to Beaverdam Creek.

This means that the law requires a supplemental EIS that addresses these impacts to be released for public review and comment before a decision is made or construction begins. In addition, the Corps should address the compliance issues at the Blue Plains WWTP revealed in EPA's ECHO report for the existing currency production facility and whether those issues are likely to be exacerbated by wastewater discharges from the proposed CPF.<sup>10</sup>

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<sup>5</sup> U.S. Department of Energy, Clean Energy for New Federal Buildings and Major Renovations of Federal Buildings, 89 Fed. Reg. 35384 (May 1, 2024).

<sup>6</sup> *Id.* at 35385.

<sup>7</sup> Maryland Department of the Environment, Maryland's Climate Pollution Reduction Plan at 36 (Dec. 28, 2023), *available at* <https://mde.maryland.gov/programs/air/ClimateChange/Maryland%20Climate%20Reduction%20Plan/Maryland%27s%20Climate%20Pollution%20Reduction%20Plan%20-%20Final%20-%20Dec%2028%202023.pdf>.

<sup>8</sup> National Capital Planning Commission, Final Review of Bureau of Engraving and Printing's proposed Currency Production Facility, *available at* <https://www.ncpc.gov/projects/8243/>.

<sup>9</sup> *Id.* at 26-27.

<sup>10</sup> See Blue Plains Wastewater Treatment Plan Detailed Facility Report, <https://echo.epa.gov/detailed-facility-report?fid=110029030144>.

Any potential impacts from new pollutants that would be discharged from the CPF and are not currently discharged by the existing currency production facility in Washington, D.C., should be considered, and any noncompliance issues with the current facility's pretreatment permit must be evaluated in a supplemental EIS.<sup>11</sup>

While Sierra Club supports the change to avoid discharging wastewater into Beaverdam Creek, we share others' concerns that the Corps must analyze the water quality impacts of this revised plan to adequately support its decision to construct and operate the expanded CPF at this location.

**d. Archeological sites.**

The proposed CPF and related traffic and utilities mitigation work is within the BARC Historic District including the Central Farm and protections under the National Historic Preservation Act ("NHPA") Section 106 process must apply. Yet, the Draft EA explains that the Bureau of Engraving and Printing completed archeological surveys only within the Limit of Disturbance for the proposed project. The Phase 1 and Intensive Phase 1 Archeological Survey for the project (prepared in November 2022) stated that "[p]roposed designs for the traffic improvements are ongoing, but no formal concept designs have been developed due to schedule delays." As the designs develop, the Bureau of Engraving and Printing must ensure that they complete surveys for the areas that may be impacted.<sup>12</sup>

We note that the Phase I Archeological Survey of 2022 evaluated an area that appears less extensive than the work proposed in the Draft EA.<sup>13</sup> The gaps in the survey need to be remedied. The Draft EA states that the BARC and the BW Parkway are cultural landscapes. See Draft EA at 1-6. A "cultural landscape" is a term of art under the NHPA and to comply with the Act, the Corps must evaluate the impacts of the proposed work on viewsapes, natural features, and topographical features. These features do not seem to be adequately analyzed in the Phase 1 Archeological Survey or in the Draft EA and must be fully considered.

The assumption in the EA that the only NHPA Section 106 impacts are on archaeological or architectural resources within the BARC is premature. Instead, the determination of effects must be made in consultation with the Advisory Council on Historic Preservation, the Maryland Historical Trust, and any other consulting parties, as part of the Section 106 process for this undertaking. We also note that determination of eligibility lists many contributing features

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<sup>11</sup> It appears the current facility's wastewater discharges to Blue Plains are significantly smaller than what Treasury is proposing for the new Facility. See Semiannual Report for July – December 2021 & 4th Quarter Report; see also Wastewater Discharge Permit Number 017-11.

<sup>12</sup> Knight-Iske, Geri, United States Department of Agriculture: 3400 Beltsville Agricultural Research Center and Bureau of Engraving and Printing Traffic Mitigation Undertaking - Phase I and Intensive Phase I Archaeological Survey Beltsville, Prince George's County, Maryland at AB-1 (2022) ("Phase 1 Survey").

<sup>13</sup> Compare Phase 1 Survey at 2-2 – 2-3 with Draft EA at App'x A, at PDF 118-119 (Figures).

including, but not limited to architectural and archeological resources, including roads, meadows, and forests. The potential effect on these contributing resources must also be considered.

As the attached Surplus Demolition Building determination from 2021 explains: “The entire 6582-acre Beltsville Agricultural Research Center (BARC) Historic District was determined eligible for the National Register of Historic Places under Criteria A and C as the US government’s central agricultural resource facility since the early 20th century. Contributing resources of the historic district include buildings, structures, major paved roads, including Powder Mill Road, minor service roads, field and research crops, pasture lands, seasonal ponds, forests, sustainable meadows, and other landscape features, and buildings.”<sup>14</sup>

Sierra Club requests to be considered a consulting party for the CPF’s Section 106 process.

Some of the Draft EA’s effects determinations for impacts to archeological sites are based on assumptions that the Corps and Treasury will avoid certain impacts or undertake certain actions. Those commitments must be enshrined in an eventual finding of no significant impact (FONSI) (provided that the other issues and other deficiencies are also addressed) or amended Record of Decision (ROD) and in bidding documents and construction contracts. Those commitment must include, but should not be limited to:

- No architectural or structural historic properties that contribute to the BARC Historic District will be directly impacted by the proposed work (they will be avoided).
- The portions of 18PR90, 18PR91, and 18PR92 that have not been subjected to additional survey by Bureau of Engraving and Printing (BEP) will be avoided during construction.
- The project will avoid site 18PR1127.
- The traffic lights and any stormwater bioswale features will be within the BW Parkway boundary.
- In close coordination with the National Park Service (NPS), any stormwater features will be designed to minimize their appearance on the landscape by using bioswale features with native plantings to retain green space. The edges of the bioswales will be “feathered” with plantings historically present along the Parkway to make the stormwater features less noticeable and in keeping with the NPS’ cultural landscape plan for the Parkway.<sup>15</sup>

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<sup>14</sup> Maryland Historical Trust, Determination of Eligibility Form for the BARC, Inventory Number PG:62-14 at 1 (Dec. 30, 2021) (attached). *See also id.* at 4 (“The [Maryland Historical] Trust concurred that the entire BARC facility of 6852 acres was eligible for the National Register.”).

<sup>15</sup> The Baltimore-Washington Parkway “is a cultural landscape, intended to retain a combination of thick, forested woodland forest and grassy lawn within the median in accordance with the landscape standards set forth in mid-20th century parkway construction.” National Park Service, Foundation Document Overview: Baltimore-Washington Parkway Maryland at 4, *available at* <http://npshistory.com/publications/foundation-documents/bawa-fd-overview.pdf>.

- Any roadway signage will be in keeping with other signage present throughout the historic district.
- All laydown areas will be restored to their original agricultural use upon the completion of construction, minimizing effects to BARC's setting.
- The proposed sewer and gas lines will be installed below ground.
- The above ground utilities will be installed on poles similar in height and appearance to those utility poles already in use throughout BARC to minimize any potential visual impacts.
- New utility poles will be installed within existing utility corridors.
- The removal of the rumble strips along Powder Mill Road will restore the rural agricultural setting and feeling for motorists passing through BARC.<sup>16</sup>

This list must also be supplemented with the similar commitments to avoid impacts to historical properties from the EIS and original ROD.<sup>17</sup> Additionally, the final EA must clarify what programmatic agreement or other agreement is governing the Section 106 process for this site and what procedures apply for inadvertent discoveries or unanticipated finds.<sup>18</sup> Furthermore, the Corps and Treasury must carefully review the recommendations and conclusions of the Phase 1 Survey to ensure that all recommendations are followed.<sup>19</sup>

**e. Impacts to the bats.**

Several federally and state protected bats in Prince George's County have been identified near the proposed CPF including four bat species: big brown, eastern red, hoary, and the tricolored bat.<sup>20</sup>

Sierra Club has been closely following the status of the Northern Long-Eared Bat (NLEB) that is already listed under the Endangered Species Act (ESA) as federally endangered, and the tri-colored bat (*Perimyotis subflavus*),<sup>21</sup> proposed to be listed federally as an endangered species

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<sup>16</sup> These commitments are part of the Bureau of Engraving and Printing's assessment of impacts to historic properties from the traffic and utilities project only. Draft EA at B-85, et seq.

<sup>17</sup> See 2021 ROD at 5; FEIS at 2-12. We hope that the Corps and Treasury accept the recommendations of the National Capital Planning Commission to include interpretative panels for the historic buildings destroyed as part of constructing the CPF. EIS at 9-106.

<sup>18</sup> Phase 1 Survey at 7-3.

<sup>19</sup> *Id.* at 7-1 – 7-5.

<sup>20</sup> Eric Britzke, U.S. Army Engineer Research and Development Center, *Results of Bat Survey for Proposed Bureau of Engraving and Printing Site on Beltsville Agricultural Research Center* (Dec. 2019).

<sup>21</sup> The tricolored bat was proposed to be listed as an endangered species under the ESA in September 2022 and the final determination was therefore due in September 2023. 16 U.S.C. § 1533(b)(6).

based on widespread threats to the species.<sup>22</sup> Forested areas provide summer roosting and foraging habitat for these species.<sup>23</sup> The Corps and Treasury must ensure that these be preserved as part of construction of the CPF and related traffic and utilities mitigation work to ensure the continued existence of these bats.

Fish and Wildlife Service (FWS) recently issued new, draft, voluntary consultation guidance for the NLEB and tri-colored bat.<sup>24</sup> According to the Draft EA, the last consultation on the proposed traffic mitigation and utilities work was in January 2024, which is before FWS issued its voluntary guidance, so additional consultation is crucial. Sierra Club urges the Corps to ensure that their proposed plans for construction and operation of the CPF and for the traffic and utilities mitigation work are consistent with FWS's new guidance on impacts to bats and that the Corps engage a biologist to survey for bats and then reconsult with FWS as necessary under the ESA to ensure that the proposed work does not further imperil these species.<sup>25</sup>

**f. Impacts to Indian Creek & Beaverdam Creek.**

The roadway improvements proposed in the Draft EA would be completed while the CPF is still not yet fully operational. Draft EA at 4-35. The Draft EA should have analyzed stormwater impacts from ongoing construction of the CPF together with the construction impacts from the traffic and utilities mitigation work.

In addition, in a change from the EIS, the Draft EA states that all stormwater at the CPF will be retained and reused on site.<sup>26</sup> More details about this plan and how the plan will accommodate increased and more intense rainfall events must be disclosed.

Moreover, the Corps must also carefully analyze whether Beaverdam Creek and other nearby surface waters can absorb additional pollutants and impacts from the traffic and utilities

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<sup>22</sup> FWS, *Proposed Rule: Endangered and Threatened Wildlife and Plants; Endangered Species Status for Tricolored Bat*, 87 Fed. Reg. 56,381, 56,385 (Sept. 14, 2022). In addition to being a federally listed species, the tri-colored bat is on the list of rare, threatened, and endangered animals of Maryland and should have been evaluated as a state-listed special status species.

Maryland Department of Natural Resources,

[https://dnr.maryland.gov/wildlife/Documents/rte\\_Animal\\_List.pdf](https://dnr.maryland.gov/wildlife/Documents/rte_Animal_List.pdf) (Nov. 2021).

<sup>23</sup> FWS, *Proposed Rule*, 87 Fed. Reg. at 56,385 (Sept. 14, 2022).

<sup>24</sup> FWS, *Draft Northern Long-eared Bat (NLEB) and Tricolored Bat (TCB) Voluntary Environmental Review Process for Development Projects (Consultation Guidance)*, available at <https://www.fws.gov/library/collections/northern-long-eared-bat-and-tricolored-bat-voluntary-environmental-review>.

<sup>25</sup> For example, while FWS concluded that impacts to the bats would be minimal, this was based on a failure to find any hibernacula or roost trees in the area. Sierra Club requests that the Corps and FWS confirm they have up-to-date information about bat presence and bat habitat before proceeding, rather than relying on past surveys and statements that hibernacula and roost trees have not been present in the past. See Draft EA at App'x B, at B-1-B-2.

<sup>26</sup> Draft EA at 4-20.



work proposed in the Draft EA and why that stormwater cannot be retained onsite. The proposed work should avoid impacts to Beaverdam Creek and Indian Creek to protect water quality and habitat.<sup>27</sup> This includes performing a full Tier II analysis of impacts to those waters and evaluating remaining assimilative capacity as required by the Maryland Department of the Environment.<sup>28</sup> The Maryland Department of Natural Resources has occurrence data that shows that Beaverdam Creek specifically supports rare, threatened and endangered odonates, fish and plants, and those species and their habitat must be protected.<sup>29</sup>

The Corps and Treasury must ensure that construction companies follow all stormwater-related requirements related to construction and operation to reduce impacts to those waters. These conditions, including the Corps and Treasury's commitment to reuse and retain all stormwater at the CPF site, should be included in the FONSI or amended Record of Decision issued once the EA is finalized. Moreover, the Corps and Treasury should include stormwater monitoring and treatment requirements in any construction contract issued by the Corps or Treasury.

**g. The Agencies Should Avoid Impacts Wherever Possible.**

The Corps and Treasury must select design alternatives that reduce wetland impacts and impacts to forested areas as well as individual trees. The Baltimore-Washington Parkway, which is included in the proposed work under the Draft EA currently provides a forested corridor that "serves as a dispersal corridor for wildlife. The forest reduces habitat fragmentation, protects plant and animal species against increased urbanization, and reduces potential impacts from climate change. The forested buffer along the parkway assists with the protection of regional species and enhances biodiversity."<sup>30</sup> In addition the Parkway forested areas serve "as an increasingly important corridor for wildlife, from forest dwelling species to migratory birds."<sup>31</sup> The Corps and Treasury should do more to avoid impacts to the Parkway's forested areas.

The EPA has suggested that wetland functions must be assessed to allow for appropriate mitigation. We join those comments and urge the Corps to mitigate all lost wetland functionality.

The proposal for both the CPF and related traffic and utilities mitigation work currently includes cutting down forested acres which engenders critical habitat loss. The Corps and Treasury must continue to refine their proposed work to avoid forest removal where possible and to mitigate any tree cover loss with at least a five-to-one ratio of trees replaced to those lost.

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<sup>27</sup> The EPA also recommends that impacts to the riparian areas along Indian Creek and impacts to Beaverdam Creek be avoided. Draft EA at App'x B, at B-188-B-189.

<sup>28</sup> *Id.* at B-196-B-200.

<sup>29</sup> *Id.* at B-203.

<sup>30</sup> National Park Service, Foundation Document Overview: Baltimore-Washington Parkway Maryland at 3, *available at* <http://npshistory.com/publications/foundation-documents/bawa-fd-overview.pdf>.

<sup>31</sup> *Id.* at 4.

The Draft EA does not sufficiently acknowledge the changes in Maryland’s rainfall patterns due to climate change. When the Corps and Treasury propose a project like the CPF and related traffic and utilities mitigation work with anticipated increased impervious surface impacts, it must include an analysis in its NEPA documents of those impacts, considering the changed rainfall intensity and patterns and the knock-on impacts to nearby surface and groundwater, and do everything it can to avoid increases in impervious surface.

The Draft EA could do more to require that the CPF and related traffic and mitigation work are designed to reduce noise impacts. The final EA should include specific benchmarks for the required noise-suppression plan. Communities impacted by the traffic and construction and operation of the CPF should also not have to endure any more ongoing noise impacts than absolutely necessary.

Finally, as for archeological and stormwater impacts, in general, required mitigation measures, permits, and impact plans, must be memorialized in the FONSI or amended Record of Decision. For example, the Draft EA includes several mitigation measures, including required permits, in the Mitigation Measures Table in Appendix C.<sup>32</sup> Relevant conditions from those measures, permits, state and federal requirements, and required planning documents must also be explicitly included in bidding documents and construction contracts to ensure compliance.

**h. The BARC Must Be Preserved.**

Sierra Club joins our local partners to oppose siting the CPF in the BARC. In an area with limited greenspace, allowing an industrial facility into the BARC is like opening a Pandora’s Box. Allowing one industrial facility in the BARC could serve as a precedent for other industrial uses in an area that provides much needed contiguous wildlife habitat. Further fragmentation of this essential green space would go against state and federal land preservation goals.

The Maryland Department of Natural Resources’ Wildlife and Heritage Service identified declines in extensive, unbroken forested area as a key reason for declines in Forest Interior Dwelling Species in Maryland and strongly encourages conservation of that habitat.<sup>33</sup> Building the CPF in the BARC threatens to disrupt more habitat, to adversely impact water quality in key Maryland streams, and to impact nearby communities.

Private corporations are likely eyeing the proposed CPF and hoping to site their own industrial facilities there. Sierra Club urges the Corps and Treasury to reconsider their plans and propose another location in Prince George’s County for the CPF on a remediated brownfield.

**i. Impacts to local roads must be fully evaluated.**

The Draft EA proposes to widen Powder Mill Road through the BARC and the southern part of Edmonston/Kenilworth Road to the Beltway, which are already highly trafficked roads. The

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<sup>32</sup> Draft EA at PDF 355-357.

<sup>33</sup> Draft EA at App’x B, at B-203.

additional traffic from workers using these roads while constructing the CPF and undertaking the related traffic and utilities mitigation work, and from the commuters who will eventually work at the CPF, threaten to change the character of these roads. Moreover, they will add unwanted traffic congestion, greenhouse gas emissions, and other air pollution to these areas, as discussed above. All of those impacts must be fully analyzed in the Draft EA.

Furthermore, this additional traffic will impact emergency response times in the area. Beltsville and Greenbelt are relatively small communities and their fire stations like many others have had issues with staffing. The Draft EA must address how adding traffic to these roads will affect the ability of fire stations and other first responders to address emergencies.

#### **j. Impacts from 6PPD-Q runoff.**

The Draft EA does not address the current or likely increased runoff of 6PPD-Q that the CPF and traffic and utility mitigation work will cause. 6PPD-q is created by the interaction of a tire manufacturing chemical (6PPD) and the environment as tire particles are released, found on roads, parking lots, and in stormwater. It poses lethal effects to trout and other fish species present in the watershed, and emerging science points to toxicity in mammals and risks to human health as well.<sup>34</sup> The draft EA fails to evaluate the effects or potential practices to mitigate its harms.<sup>35</sup> Before adding extensive impervious surface that will be used by cars and trucks, the Agencies should sample area waterbodies, compare 6PPD and 6PPD-q concentrations to EPA's recently published screening values, and evaluate how the increased surface and tire traffic will impact those values.<sup>36</sup>

### **3. The Corps and Treasury Should Ensure the Proposal Provides Local Jobs and Would Implement "Complete Streets" Policies.**

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<sup>34</sup> Delaware River Basin Commission, Contaminants of Emerging Concern: 6-PPDq (nj.gov), available at <https://www.nj.gov/drbc/programs/quality/6-ppdq.html>; Substance Derived From Tire Debris is Toxic to Two Trout Species, Not Just Coho Salmon - American Chemical Society (acs.org), available at <https://www.acs.org/pressroom/presspacs/2022/acs-presspac-march-2-2022/substance-derived-from-tire-debris-is-toxic-to-two-trout-species.html>; Oral Exposure to Tire Rubber-Derived Contaminant 6PPD and 6PPD-Quinone Induce Hepatotoxicity in Mice, available at <https://pubmed.ncbi.nlm.nih.gov/36716866/>; First Report on the Occurrence of N-(1,3-Dimethylbutyl)-N'-phenyl-p-phenylenediamine (6PPD); and 6PPD-Quinone as Pervasive Pollutants in Human Urine from South China, Environmental Science & Technology Letters, available at <https://pubs.acs.org/doi/abs/10.1021/acs.estlett.2c00821>.

<sup>35</sup> Rodgers, T.M. et al., Bioretention Cells Provide a 10-Fold Reduction in 6PPD-Quinone Mass Loadings to Receiving Waters: Evidence from a Field Experiment and Modeling | Environmental Science & Technology Letters (acs.org), available at <https://pubs.acs.org/doi/10.1021/acs.estlett.3c00203>.

<sup>36</sup> U.S. EPA, Aquatic Life Criteria and Methods for Toxics, available at <https://www.epa.gov/wqc/aquatic-life-criteria-and-methods-toxics#acute>.

The Corps and Treasury should guarantee that the local community benefits from jobs in construction and at the new CPF once it is operational by ensuring that Prince George’s County residents have priority access to jobs created. The Governor of Maryland, Wes Moore, recently signed an executive order to promote workforce development in state projects.<sup>37</sup> Treasury and the Corps should use Maryland’s example as a model for the CPF and ensure that all contracts signed for the CPF promote workforce development, apprenticeship programs, and local hiring, particularly in high unemployment areas. The Corps and Treasury must ensure in their contracting that the construction and operation of the CPF as well as related traffic and utilities mitigation projects provide an opportunity to improve the well-being of Marylanders.

Any intersection and roadway improvements should also be designed to satisfy “complete streets” goals. This means the designs should include additional bus stops to allow for multi-modal transit, accommodate new separated walking and biking paths, and include curb bump outs to allow safer pedestrian movement.<sup>38</sup> Maryland Department of Transportation recently released a state-wide policy that aims to reduce traffic deaths and “ensure that a range of safe options for multimodal transportation, including active transportation, are prioritized throughout all phases of project development.”<sup>39</sup> Those principles of encouraging bike lanes, pedestrian pathways, and accessible transit must be applied to the projects proposed by Treasury and the Corps related to the CPF.

Roadway pedestrian fatalities spiked in the early 2020s nationwide and Maryland alone saw 600 roadway deaths in 2023.<sup>40</sup> Maryland is recommitting to road safety<sup>41</sup> and agencies responsible for projects on Maryland roads should also commit to making Maryland’s roadways safer. Relevant to the CPF and related traffic and utilities mitigation work, this commitment should include improving culverts and other infrastructure to create wildlife corridors and minimize vehicle strikes.

Additionally, in designing these projects, the CPF must be based on recent traffic data, including data post-2020, to ensure that the roadway improvements address Marylanders’

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<sup>37</sup> See Press Release: Governor Moore Signs Workforce Development Executive Order for State Public Works Projects (Nov. 17, 2023), *available at* <https://governor.maryland.gov/news/press/pages/governor-moore-signs-workforce-development-executive-order-for-state-public-works-projects.aspx>.

<sup>38</sup> Maryland Department of Transportation encouraged Treasury and the Corps to ensure that the proposed intersection and roadway improvements include plans to add bus stops to allow for multi-modal transit. Draft EA at App’x B, at B-193.

<sup>39</sup> MDOT, Maryland Complete Streets Initiative, *available at* <https://www.mdot.maryland.gov/tso/pages/Index.aspx?PagelD=207>.

<sup>40</sup> Daniel Zadwodny, Maryland officials want a ‘culture change’ that puts road safety first, *Baltimore Banner* (June 6, 2024), *available at* <https://www.thebaltimorebanner.com/community/transportation/complete-streets-maryland-transportation-road-fatalities-XGN3ORL5QBCQTOWFSJIT2QPYR4/>.

<sup>41</sup> *Id.*

current commuting and daily needs rather than addressing the traffic patterns of the past decades. This analysis should include pre-construction crash data and animal strike data<sup>42</sup> to understand what intersections and roadway sections need to be improved to reduce those issues. The Corps and Treasury should also commit to post-construction traffic data monitoring to ensure that the fixes were effective.

## **Conclusion**

Sierra Club Maryland Chapter appreciates the opportunity to comment on the U.S. Army Corps of Engineers' draft Environmental Assessment for Traffic and Utilities Mitigation for the Bureau of Engraving and Printing's Replacement Currency Production Facility.

Please direct any questions about these comments to my colleague Paula Posas (paula.posas@mdsierra.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Josh Tulkin". The signature is fluid and cursive, with a horizontal line extending from the end.

Josh Tulkin  
Director, Sierra Club, Maryland Chapter

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<sup>42</sup> The Maryland State Police collect have crash data through 2023.  
<https://mdsp.maryland.gov/Pages/Dashboards/CrashDataDownload.aspx>.