

City of Greenbelt

City Manager's Report

Week Ending July 2, 2021

1. Attached is the Police Statistical Report for May 2021.
2. Also attached is a copy of the letter sent to the US Army Corp of Engineers on the Final Environmental Impact Statement for the Construction and Operation of a Currency Production Facility at BARC.
3. **Assistant City Manager**
 - a. On leave.
4. **Human Resources**
 - a. Completed the enrollment of 26 new seasonal staff into the payroll system.
 - b. Completed the bills for all retirees insurance and mailed them.
 - c. Participated in interviews for the CARES Family Counselor and Bilingual Counselor.
 - d. Organized staff electronic personnel files.
 - e. Completed a worker's compensation claim.
 - f. Entered all of the retiree payments.
 - g. Advertised the Grants Coordinator opening internally and externally.
 - h. Participated in interviews for the Facility Maintenance Technician.
5. **City Treasurer/Finance**
 - a. Met with a second potential financial management system representative to receive an overview of software features. Scheduled a demonstration of the Tyler Munis system--representative to provide information of financial suite including budgeting, AP, GL and purchasing as well as HR/payroll, work orders, tax billing, parks and recreation and permitting, planning and zoning.
 - b. Continued to update the FY 2022 budget information in the automated budgeting system and have started to enter budget information into the financial accounting system--these are two separate systems that are not connected.
 - c. Finalized the electricity contract and reviewed other pending contracts and payables for execution in the new fiscal year.
 - d. Processed payables and vendor checks.
6. **Information Technology**
 - a. On leave.
7. **Economic Development**
 - a. Shared new Maryland Project Restore initiative with 3 property managers.
 - b. Connected with 2 local businesses about COVID-19 related updates.
 - c. Worked with a local business to share tech-related training initiatives.
 - d. Meeting with a local business to learn about plans for growth and expansion in new markets.
 - e. International Economic Development Council Webinar: The Services Desert and Its Impact on Equity
 - f. Inc.com Your Next Move Webinar Series: Female Founders Fund
 - g. International Council for Shopping Centers Webinar: EV Charging Solutions: The Future is Electric

cc: Department Heads

Tim George, Assistant City Manager

Dawane Martinez, Human Resources Director

Bonita Anderson, City Clerk

GREENBELT POLICE DEPARTMENT
STATISTICAL REPORT
May, 2021

Type of <u>Offense</u> (Includes attempts with exception of Murder)	Sector 1 Greenbelt Center		Sector 2 Franklin Park Area		Sector 3 Greenbelt East (Residential)		Sector 3 Greenbelt East (Commercial)		Sector 4 Beltway Plaza		Sector 5 Metro Site		Sector 6 Branchville Area		Total Offenses (Minus Unfounded Cases)		
	Month	YTD	Month	YTD	Month	YTD	Month	YTD	Month	YTD	Month	YTD	Month	YTD	Month Total	YTD Total	
Murder	0	0	1	2	0	0	0	0	0	0	0	0	0	0	0	1	2
Rape	0	2	0	1	0	0	0	0	0	1	0	1	0	0	0	0	5
Robbery	0	4	1	13	1	2	1	3	0	2	0	0	0	0	3	24	
Aggravated Assaults	0	1	0	8	2	4	2	4	0	3	0	0	0	0	4	20	
Breaking or Entering	0	3	1	10	1	2	1	6	4	5	0	0	1	2	8	28	
Larceny	12	54	18	69	9	50	7	34	6	36	0	0	0	1	52	244	
Motor Vehicle Theft	1	5	2	46	1	6	0	0	0	1	0	0	0	0	4	58	
Totals by Sector	13	69	23	149	14	64	11	47	10	48	0	1	1	3	72	381	

Sector 1 – Kenilworth Avenue north from Greenbelt Road to Cherrywood Lane and Greenbelt Road east from Kenilworth Avenue to Southway Road.

Effective 1/1/97 Ivy Lane and Cherrywood Lane changed to Sector 2. Kenilworth Avenue addresses are in Sector 1.

Sector 2 – Kenilworth Avenue south from Greenbelt Road to Old Calvert Road and Greenbelt Road west from Kenilworth Avenue to Branchville Road.

Sector 3 – Greenbelt Road east from Southway Road to Mandan Road, Hanover Parkway north from Greenbelt Road to the Baltimore-Washington Parkway south from Greenbelt Road to Good Luck Road. Sector 3 has been divided to distinguish offenses that occur in the sector’s commercial and residential areas.

Sector 4 – Beltway Plaza Shopping Center and businesses on Greenbelt Road from Cherrywood Lane to the City line at Branchville Road.

Sector 5 – Greenbelt Metro

Sector 6 – South of the WMATA/Metro Station Property, north of Branchville Rd./Greenbelt Rd., west of Cherrywood Lane, east of the B&O RR tracks

II. Total Offenses Year to Date – Five Year Comparison – *All Sectors*

January 1 to May 31 of each year

<u>Type of Offense</u> (includes attempts with Exception of Murder)	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>
Criminal Homicide	3	1	1	1	2
Rape	3	2	2	6	5
Robbery	35	18	20	23	24
Aggravated Assaults	25	19	19	23	20
Breaking or Entering	54	37	19	38	28
Larceny	238	231	228	220	244
Motor Vehicle Theft	20	32	35	26	58
TOTALS YTD -----	378	340	324	337	381

May, 2021 Monthly Stats

III. Police Service Summary

	<u>2021 MONTHLY TOTAL</u>		<u>2021 YEAR-TO-DATE TOTAL</u>		<u>2020 YEAR-TO-DATE TOTAL</u>	
Calls for Service	2,098		10,291		11,909	
Premise Checks	630		3,004		5,171	
Traffic Stops	103		962		737	
Case Reports	222		1,135		860	
Field Ob. Reports	21		101		36	
ACRS Reports	31		121		92	
	Adult	Juvenile	YTD Adult	YTD Juvenile	YTD Adult	YTD Juvenile
Arrests	20	0	96	5	91	18

Automated Enforcement

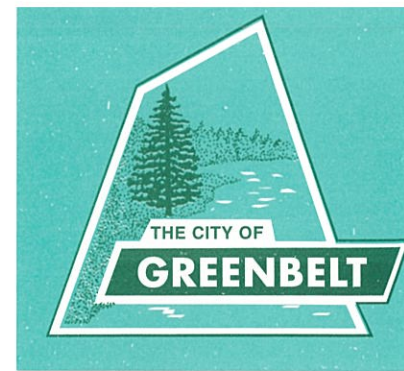
Speed Camera Location	May 2021 Citations	Citations 2021 YTD	Red Light Camera Locations	May 2021 Citations	Citations 2021 YTD
300 Crescent Road	12	47	EB Greenbelt Road @ Mandan Road	37	133
5900 Cherrywood Lane N/B	343	1,295	WB Greenbelt Road @ Mandan Road	71	333
5900 Cherrywood Lane S/B	212	711	WB Greenbelt Road @ Cherrywood	342	1,352
7700 Hanover Parkway E/B	45	192	NB Kenilworth Avenue @ Cherrywood	191	759
7700 Mandan Road N/B	157	618	NB Kenilworth Avenue @ NB I95- Off Ramp	78	332
7700 Blk MD 193 E/B	92	389	NB Kenilworth Avenue @ SB I-95 Off Ramp	256	980
7700 Blk MD 193 W/B	332	1,318			
Totals -----	1,193	4,570	Totals -----	975	3,889

IV. Traffic Statistics – Year-to-Date Totals

<u>Accidents</u>	<u>YTD – 2021</u>	<u>YTD – 2020</u>	<u>Traffic Arrests</u>	<u>YTD – 2021</u>	<u>YTD – 2020</u>
Property Damage	362	262	DUI Arrests	37	22
Personal Injury	31	31	Other Traffic Arrests	94	76
Fatal	0	0			
Totals -----	393	293	Totals -----	131	98

CITY OF GREENBELT

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July 2, 2021

Mr. Harvey Johnson
ATTN. Bureau of Engraving and Printing (BEP)
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Emmett V. Jordan, Mayor Pro Tem
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Rodney M. Roberts

Submitted via email to: BEP-EIS@usace.army.mil

Dear Mr. Johnson:

The City of Greenbelt (City) has reviewed the Final Environmental Impact Statement (FEIS) for the Construction and Operation of a Currency Production Facility (CPF) at the Beltsville Agricultural Research Center (BARC) (Project). As previously stated during the Draft EIS (DEIS) public comment period, the City has serious concerns about the Project. As previously stated, the City believes that the proposed relocation of the Currency Production Facility to the Beltsville Agricultural Research Center will have significant impacts on BARC, the human and natural environment, transportation, and the surrounding community. The FEIS persists in providing inadequate analyses, and further fails to sufficiently address information made available in the interim between the close of the DEIS review period and the release of the FEIS. The City supports the No Action Alternative and is strongly opposed to the U.S. Department of the Treasury's (Treasury's) Preferred Alternative. It is imperative that the Treasury fix the faulty FEIS and issue a Supplemental EIS before issuing a Record of Decision or taking any other action to proceed with the Project.

In light of information provided in the FEIS and in other materials made available between the end of the DEIS public comment period and the release of the FEIS, the City has the following comments:

Purpose and Need statement

In response to City comments regarding the Purpose and Need statement and screening criteria, the FEIS states, in part, "Section 1.4 of the FEIS was revised to remove the screening criteria (e.g., sizes of CPF and parcel) from the Purpose statement and better

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explain how the Proposed Action would address the Need.¹ The Need statement was revised to more clearly describe the deficiency of the existing DC Facility.” FEIS at 9-6. Whereas the Purpose statement in the DEIS reads, “The **purpose** of the Proposed Action is to construct and operate a new, up to 1 million square-foot CPF on a minimum 100-acre parcel of federally owned, available land within the NCR [National Capital Region] that has ready access to interstate roadways and commercial airports for transportation of US currency”, DEIS at 1-4, the Purpose statement in the FEIS has been revised to “The **purpose** of the Proposed Action is to construct and operate a new CPF within the NCR to replace Treasury’s insufficient DC Facility.” FEIS at ES-2, 1-4.

However, simply eliminating some of the narrow and problematic language from the statement does not in itself address the deficiencies that were the subject of the City’s comments. While the Purpose statement has been broadened such that it no longer necessarily excludes evaluation of as many reasonable alternatives, the statement continues to preclude consideration of renovations to the existing facility. More significantly, despite revising the statement, Treasury has not taken the next step of developing and considering a wider range of options that would meet the revised statement based on rational and justifiable criteria. Many reasonable alternatives that were excluded based on the prior narrow statement have still been excluded from review in the FEIS. In comments on the DEIS, the City stated, “A revised Purpose and Need will also require reevaluation of the alternatives developed and the associated screening criteria.” But while Treasury has made semantic revisions to the Purpose and Need statement, Treasury has made no changes to the alternatives considered in the FEIS or the methodology used to identify them. This is evidenced by the introduction to section ES.5, “Description of the Proposed Action”, which still describes, “Ultimately, based on the Proposed Action’s purpose and need, Treasury’s site selection criteria, and the statutory authority provided by the Agriculture Improvement Act of 2018 (Public Law 115-334, § 7602; 132 Stat. 4490, 4825-26 [2018]) and the 2019 Department of the Treasury Appropriations Act (Public Law 116-6, Division D, Title I, § 127; 133 Stat. 13, 149 [2019]), Treasury determined that an approximately 104-acre parcel at BARC (Treasury’s proposed parcel) was the only reasonable alternative.” FEIS at ES-2, DEIS at ES-2. It is unclear why Treasury would make such revisions to the Purpose and Need statement and still use effectively the same criteria to identify the BARC site as the only alternative to be considered under the National Environmental Policy Act (NEPA). Treasury’s response does not address concerns voiced with the DEIS in this regard. Treasury should not make a decision on the Project until a true evaluation of all reasonable alternatives is performed based on a Purpose and Need statement that is not unreasonably narrow.

Further, the description of the No Action Alternative calls into question the newly revised Purpose and Need statement. Whereas the Purpose and Need statement has been revised in the FEIS to remove all mention of BARC, the description of the No Action Alternative has been expanded and now includes a paragraph describing USDA and BARC

¹ The FEIS inaccurately lists “Holly Simmons” as the name of the commenter for the City of Greenbelt’s comments on the DEIS. The commenter name for Greenbelt’s comments should be changed to Mayor Colin A. Byrd and Council.

under the No Action Alternative. This new paragraph adds little utility and includes such general and obvious statements as “the USDA would remain responsible for complying with all applicable federal and state regulations” (see FEIS at ES-3 to ES-4). Based on the Purpose statement, which does not mention BARC and which ostensibly broadens the suite of alternatives to all those in the NCR, it seems misleading to reference BARC in the description of the No Action Alternative – let alone to significantly increase the attention this property is given in this section. Given the revised Purpose statement, it would be more reasonable to describe the No Action Alternative in terms of either 1) only the Treasury facilities, which are directly implicated in the Purpose and Need, and/or 2) Treasury facilities and the entire NCR, which is referenced in the Purpose and Need. The focus on BARC further illustrates the invalidity of the Purpose and Need statement and the alternatives considered.

Additionally, even if we assume it were necessary to describe BARC’s status quo in the FEIS’s description of the No Action Alternative, why has Treasury chosen to mention only USDA’s responsibility for legal compliance, maintenance of buildings, mitigation of adverse impacts to the BARC Historic District, etc., (seemingly highlighting the moderate benefits that Treasury offers USDA in terms of addressing funding and maintenance issues on BARC) while failing to indicate any of the positive aspects of maintaining the status quo? FEIS at ES-4. The picture painted of BARC’s status quo is unnecessarily biased to favor Treasury’s Preferred Alternative.

Alternatives screening

Section 9.0 of the FEIS states:

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

FEIS at 9-1. The 2015 Federal Agency Initial Site Investigation and Screening report, which was referenced in the DEIS but which was not provided until January, 2021 (and then only in summary form, with many pages omitted), provides three primary criteria “based on the operational needs of the Federal agency customer” to identify facilities, one of which is plot size. Federal Agency Initial Site Investigation and Screening Summary Report at 2 (Sept. 30, 2015).² This partial report confirms that, for a non-secured perimeter site, a minimum of

² The City reiterates its request that this complete document, and all documents referenced or relied on within the FEIS, be made publicly available for comment prior to Treasury making a decision on the Project. See 40 C.F.R. § 1502.21 (2019) (materials incorporated by reference into an

60 acres was considered and 100 acres was desired; however, it also shows that for a secured perimeter site, 50 acres was the minimum considered. *Id.* The FEIS fails to mention or account for this variability going forward. Additionally, the minimum plot width was listed as 1,500 feet in either instance (secured perimeter/non-secured perimeter). *Id.* It is unclear why the DEIS and FEIS have abandoned this numerical width requirement in favor of references to setbacks and security requirements.

Section 9.0 of the FEIS states, “Later, in 2017, Treasury’s Future Workplace Recommendations Report and Facility Feasibility Study were completed (BEP, 2017b; BEP, 2017c), which confirmed the site requirements necessitating a minimum 100-acre parcel; Section 2.3 was revised to include these requirements.” FEIS at 9-1. Treasury also lists these studies as the basis for the site screening criteria. FEIS at 2-17. Neither of these studies has been made fully available to the public. Treasury has provided 13 pages from the 51+ page Future Workplace Recommendations Report, stating that “these reports contain sensitive information and cannot be published in full at this time.” FEIS at 9-1. Seven of the pages provided are cover pages and a list of definitions. The report’s Table of Contents has been omitted, so it is not possible for the public to understand even in the most general terms the full scope of the information contained within the report. While it is possible to confirm that, based on the methodology used, a new facility would require a net square footage of over 950,000 (approximately 22 acres) and a gross square footage of just over 1 million (approximately 24 acres), it is not possible to confirm that a minimum 100-acre parcel is required to accommodate such a facility. Further, Treasury has not yet made available the Facility Feasibility Study. Rather than providing the information for the public to understand the full site area requirements, Treasury continues to ask the public to take their word for it.

Under NEPA, materials can be incorporated by reference into an EIS but must be “made reasonably available for inspection by potentially interested persons within the time allowed for comment.” 40 C.F.R. § 1502.21 (2019). “Material based on proprietary data which is itself not available for review and comment shall not be incorporated by reference.” *Id.*³ “When relevant information ‘is not available during the [impact statement] process and is not available to the public for comment[,] . . . the [impact statement] process cannot serve its larger informational role, and the public is deprived of [its] opportunity to play a role in the decision-making process.’” *N.C. Wildlife Fed’n v. N.C. Dep’t of Transp.*, 677 F.3d 596, 604-05 (4th Cir. 2012) (alterations in original) (quoting *N. Plains Res. Council, Inc. v. Surface Transp. Bd.*, 668 F.3d 1067, 1085 (9th Cir. 2011)); see *League of Wilderness Defs./Blue Mountains Biodiversity Project v. Connaughton*, No. 3:12-CV-02271-HZ, 2014 WL 6977611, at *15-17 (D. Or. Dec. 9, 2014) (agency is prohibited “from relying on information in the preparation of an EIS while refusing to make that information available to the public”

EIS must be “made reasonably available for inspection by potentially interested persons within the time allowed for comment”).

³ See also 40 C.F.R. § 1501.12 (2021) (emphasis added) (“Agencies shall not incorporate by reference material based on proprietary data that is not available for review and comment.”).

and there is no privilege exception to the required disclosure). Plainly, that the “reports contain sensitive information,” FEIS at 9-1, is not a valid justification for withholding this information from the public. By incorporating by reference and relying on these reports in the FEIS, and not providing them to the public for review, Treasury risks making a final decision based on an insufficient FEIS, subject to reversal in court.

Treasury continues, “Several commenters also noted that the construction LOD would avoid impacts to approximately 22 acres of the site. While these areas (e.g., the existing forest conservation easements) would not be within the anticipated LOD, this space is still necessary for the Proposed Action to enable Treasury to meet current physical security standards (e.g., security setback distances and a secure perimeter) in accordance with ISC standards (ISC, 2016).” FEIS at 9-1. Elsewhere, the FEIS states that part of the rationale for the 100 acres of land is that “[t]he site would need to be able to accommodate a potential future building expansion”, FEIS at 2-18; however, much of the land that enables the subject site to meet the minimum area requirement includes forest conservation easement, wetland, or other sensitive environmental features. Perhaps these areas are necessary to provide a security setback (though it is not possible for the public to confirm this), but if Treasury anticipates that these areas may be impacted in the future, this possibility should be made clear in the FEIS.

Failure to consider best available information on currency demand

The City and others commented that the assumption that the demand for cash will continue to rise, which underlies the Purpose and Need of the Project, is based on outdated and/or inaccurate information. As one example, Greenbelt pointed out the opinion of Gary Cohn, former Director of the National Economic Council and chief economic advisor to the President, disputing the DEIS’s assumption.

In response, the FEIS merely states that the assumption is based on the best available data and Gary Cohn is not affiliated with Treasury and his contrary opinions represent his own. FEIS at 9-5, 9-6. The FEIS maintains that the demand for cash will continue to rise over the next 10 years, citing a 2018 GAO Report. FEIS at 1-1.

While Gary Cohn may not be affiliated with Treasury, that does not change Treasury’s obligation to use the best available information, particularly for a key assumption underlying the Purpose and Need. *See Sierra Club v. U.S. Army Corps of Eng’rs*, 701 F.2d 1011, 1030 (2d Cir. 1983) (an EIS premised on false or inaccurate information fails to provide a basis for “informed evaluation or a reasoned decision”). Gary Cohn’s opinion, that of a high-ranking executive branch official at the time, was provided as one example of evidence that contradicted the DEIS’s assumption that the demand for cash will continue to rise. The need to consider up-to-date information and reasonably foreseeable trends is particularly important given that full operation of the proposed new facility would not occur until 2029. There is substantial evidence that disputes or at least calls into question the assumption that demand for cash will continue to rise, including increased card usage, person-to-person payments, and alternative currency acceptance, yet both the DEIS and FEIS ignore this information, instead hand waving it away by claiming one such piece of

that evidence comes from an official not affiliated with Treasury. *See, e.g.*, Congressional Research Service, The Potential Decline of Cash Usage and Related Implications (May 10, 2019), https://www.everycrsreport.com/reports/R45716.html#_Toc8638743; Nathaniel Lee, The Coronavirus Pandemic has Caused a Surge in Demand for Contactless Payments, Accelerating the Shift from Cash to Digital Options, CNBC (Dec. 3, 2020), <https://www.cnbc.com/2020/12/03/covid-19-pandemic-accelerating-the-shift-from-cash-to-digital-payments.html>; U.S. Payment Trends: Cash Payments Continue Gradual Decline, The Federal Reserve FedPayments Improvement (2020), <https://fedpaymentsimprovement.org/news/blog/u-s-payment-trends-cash-payments-continue-gradual-decline/>. NEPA does not permit an agency to consider only information that originated within the agency itself. Indeed, the GAO Report, which Treasury does consider, was not authored by Treasury either, making the FEIS's dismissal of outside opinions all the more arbitrary.

Moreover, the sole support the FEIS points to, the 2018 GAO Report, merely states that there are "indications currency demand *will not substantially decline within the next decade.*" GAO Report at 14 (emphasis added). That does not support the claim that demand will continue to rise. And the GAO Report does not address currency demand beyond 2028, while the CPF will not be fully operational until 2029.

The FEIS claims that a reliable forecast of cash demand beyond 10 years in the future cannot be determined. FEIS at 9-5. It does not explain why not or what information Treasury looked at before reaching this conclusion (although it appears Treasury considered only the GAO Report). Moreover, why is Treasury's claimed inability to obtain information not recognized in the body of the FEIS? Instead, the body of the FEIS states the assumption definitively. Treasury should not undertake this Project without considering the level of demand for cash when the CPF would be fully operational. This is particularly true given potential decreases in demand for cash brought on by COVID-19; for example, during the pandemic and even before, there has been increased use of credit and debit cards and electronic payment options. There is also currently an increase in the use and acceptability of cryptocurrencies for payment purposes as well as investment. It is not clear how or if Treasury considered these trends. To the extent it is true that demand cannot be predicted, Treasury must acknowledge and explain that deficiency and utilize the best available information for demand; the GAO Report, which does not even say that demand for currency will continue to rise as the FEIS states, is plainly insufficient. If Treasury is utilizing other information as a basis for its decision, then that information must be made available for public review and comment.

Cost

The City notes that the importance of cost, which was clear across the DEIS, has been de-emphasized in the FEIS. For example, in describing why Treasury eliminated private sites from consideration, the FEIS and the DEIS present the same information, but the FEIS re-orders it: The DEIS states that, in late 2015, "Treasury determined that a federally owned property was reasonable for two primary reasons: 1) Acquiring or leasing a privately owned property in the NCR would cost substantially more ... than re-purposing

a portion of existing federally owned property in the NCR ... 2) Federal directives order federal agencies to prioritize the reduction of federal real property assets, whenever feasible.” DEIS at 2-13. The FEIS conveys identical information, but reverses the order of the two factors such that cost considerations appear to be of less importance. FEIS at 2-16.

Site security requirements

The City commented previously that “The DEIS indicates that International Security Committee (ISC) security and setback requirements factor into the site area requirements, but it is not clear how this specific setback was established, and no supporting information is provided.” While the FEIS now clarifies that the ISC security rating is a level IV (FEIS at 2-4), opaque site security requirements continue to be referenced in the FEIS. For example, in response to comments by NCPC that “highly recommend the Department of Treasury include an option for structured/below grade parking and the following additional analysis in the DEIS: a comparison of environmental impacts including heat island, impervious surface, tree removal, and stormwater runoff related to a surface lot verses structured/below grade parking”, the FEIS states, “Treasury determined that use of structured parking would conflict with site security requirements. Structured or below-grade parking would also be substantially more expensive than surface lots. Treasury intends to use vegetation and GI/LID throughout the parking lot to improve stormwater management, heat reflection, and aesthetics.” FEIS at 9-13. However, this conflict does not preclude Treasury from performing the appropriate analyses comparing these two options to inform decision-making under NEPA. First, as Greenbelt previously commented, Treasury should explain what the site security requirements are, which are influencing the alternatives evaluated. Without this, the public cannot meaningfully review and comment on the Project or proposed alternatives that should be considered. To the extent Treasury relies on cost to exclude consideration of this alternative, Treasury should provide the public with information comparing the estimated costs that it relied on. Second, the FEIS does not state that below grade parking would conflict with site security requirements, and therefore its impacts should have been evaluated; cost alone, particularly vague references to cost without any further analysis, is not sufficient to exclude consideration of an alternative.

The FEIS fails to address information in the 1996 BARC Master Plan

Since the close of the DEIS public comment period, Treasury made available the 1996 Beltsville Agricultural Research Center Master Plan Update in January, 2021; however, Treasury has failed to evaluate land use in light of information in this document. FEIS Section 3.2.1.2 lists seven documents among the “primary land use regulations and guidance related to the Proposed Action”, but fails to include this Master Plan, which is yet another planning document that sets forth planning policies to preserve BARC land and guide development on BARC. The City finds that, as it does with other local, regional, and federal plans, the Project conflicts with the *Beltsville Agricultural Research Center 1996 Master Plan*. The Master Plan has the stated objective of developing a framework to support accomplishment of the following items:

- “Preservation of BARC’s low density character, [...]”
- “Improvement of BARC’s visual environment, [and...]”
- “Protection of wildlife and birds,” among others.

BARC 1996 Master Plan at 12.

The plan, prepared by Bernard Johnson Young Inc., under contract to the Agricultural Research Service of the USDA, also recognizes “the importance of BARC as a scenic low density [sic] oasis that has, by its function, been spared from development pressures.” Despite the fact that this document recognizes “BARC’s agricultural land is a significant component of the region’s open space, which, in conjunction with other low density areas serve as a critical natural ‘wedge’ within the densely developed National Capital Region” (BARC 1996 Master Plan at 13), the FEIS persists in obscuring this fact and treating the subject parcel and arbitrarily-drawn land use ROI as “mixed” (though the City notes the FEIS has substituted the term “mixed” in places where the DEIS previously stated the land use was “mixed-use”, this change seems to be primarily semantic and to have had little or no effect on Treasury’s analysis.) FEIS at 3-4. The Master Plan clearly establishes BARC as the regional context, instructing, “The immediate site context of the project and the regional context of BARC establish a setting for the design.” BARC 1996 Master Plan at 58 (emphasis added).

Further, Treasury has failed to evaluate the BARC 1996 Master Plan general design guidelines and design standards for development projects on BARC when considering the visual impacts of the Project and has not listed this plan as a guidance document in the Visual Resources section of the FEIS. FEIS at 3-9. Additionally, whereas the DEIS included a Cultural Resources mitigation measure to “Design the proposed CPF using architectural styles that minimize potential adverse impacts to the viewshed”, DEIS at ES-7, this mitigation measure has been removed from the FEIS. Instead, the FEIS directs the reader to “Please see also the mitigation measures identified under Visual Resources.” FEIS at ES-9. Here, Treasury has added an additional mitigation measure regarding installation of landscape buffers on all sides of the subject parcel. FEIS at ES-8. While the City is supportive of appropriate landscape buffering, the use of vegetative buffering *and* context-sensitive architecture are not mutually exclusive. For example, in addition to architectural recommendations, the Master Plan states, “Generously landscaped, pedestrian-scaled spaces are encouraged.” BARC 1996 Master Plan at 58. It is unclear why Treasury would remove this mitigation measure from the Final EIS. Regardless of landscaping, architectural elements of the proposed development should, as the Master Plan directs, “contribute to the sense of architectural community at BARC ... [and] to the design fabric of a site’s immediate context and of BARC as a whole ... [with preference give to] materials that are local, indigenous, or vernacular are preferred.” *Id.*

NEPA requires that an EIS evaluate “[p]ossible conflicts between the proposed action and the objectives of federal, regional, state, and local ... land use plans, policies and controls for the area concerned.” 40 C.F.R. § 1502.16 (2019); *see also id.* §1506.2(d) (“To better integrate environmental impact statements into state or local planning processes,

statements shall discuss any inconsistency of a proposed action with any approved state or local plan and laws (whether or not federally sanctioned). Where an inconsistency exists, the statement should describe the extent to which the agency would reconcile its proposed action with the plan or law.”). The FEIS fails to evaluate the Project’s conflicts with the BARC Master Plan.

The FEIS fails to incorporate future rainfall projections when designing stormwater management

The FEIS states:

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

FEIS at 9-3. Treasury is required to evaluate all reasonably foreseeable environmental effects and it cannot shirk this responsibility by pointing to uncertainty; reasonable forecasting and speculation is implicit in NEPA. *Del. Riverkeeper Network v. FERC*, 753 F.3d 1304, 1310 (D.C. Cir. 2014). NEPA also requires consideration of mitigation, which cannot be properly done without identifying the reasonably foreseeable environmental effects. *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 349, 352 (1989); *Protect Our Communities Found. v. Jewell*, 825 F.3d 571, 581-82 (9th Cir. 2016). The stormwater impacts discussed in the DEIS, and the mitigation measures considered for those impacts, must be based on scientifically accepted methodologies. *See* 40 C.F.R. §§ 1500.1(b), 1502.22, 1502.24 (2019).

While looking only at past rainfall data may allow Treasury to comply with other regulatory requirements, it would not allow Treasury to properly evaluate the Project’s environmental effects and mitigation measures, given well-established recognition that the climate is changing. If there is incomplete or unavailable information that cannot be obtained, the agency should explain this and explain what credible information it used; however, the fact that Treasury says they may consider future rainfall projections with respect to the conveyance design suggests there is additional valid information available that has simply not been utilized in the FEIS.

The FEIS fails to account for information in the NCPC Concept Plan Submittal

The National Capital Planning Commission (NCPC) concept review period ran from late December 2020/early January 2021 to April 1, 2021. The concept plan provided in the

FEIS is the same as that provided in the DEIS, despite the fact that different (one would assume more up-to-date) plans were provided during the NCPC concept plan review. In a response to comments from the U.S. Environmental Protection Agency, the FEIS states,

Section 2.4.2 of the FEIS notes that the conceptual design is preliminary and subject to change as the design progresses. The FEIS does not include an updated concept design to avoid confusion and retain consistency throughout the EIS. Treasury is currently progressing the design of the proposed facility, and is incorporating features and styles that would further minimize viewshed effects/render the proposed facility more compatible with its surrounding landscape. Treasury revised Section 2.2.1 to note that interested stakeholders would be able to follow the design process through Treasury's public design submittals to the NCPC, including the tentative schedule (should Treasury select the Preferred Alternative for implementation in the ROD).

FEIS at 9-12.

The FEIS is essentially acknowledging that it is not analyzing the latest design and its associated environmental effects, explaining that this deficiency is intended "to avoid confusion and retain consistency throughout the EIS." As a result, the visual and other impacts of the Project are being evaluated based on a design that Treasury knows will not be used. This is problematic and contrary to NEPA. The agency should be making its decisions based on an evaluation of the environmental impacts of the planned design or design options. Avoiding confusion and retaining consistency throughout the EIS is not an adequate reason for using an old design; the solution is to use the current/up-to-date design throughout the EIS. A supplemental EIS therefore is needed.

The FEIS continues to fail to address off-site utility work and transportation mitigation

The FEIS states that off-site utility work and recommended traffic mitigation are not "ripe" for analysis, and that if the Preferred Alternative is selected for implementation with the ROD, additional NEPA analysis would be tiered off of this FEIS. FEIS at 2-25, 9-2. The FEIS also states that Treasury initiated the NEPA process early in the project planning stages, and that "Consequently, the locations and nature of proposed off-site utility work and the specifics of recommended traffic mitigation measures are not known at this time. Treasury does not have enough information at this point on which to conduct a meaningful environmental impact analysis regarding these two particular areas." FEIS at 9-2. These statements contradict claims elsewhere that "The Proposed Action is the result of Treasury's more than 20-year planning process to address the inadequacy of its current facilities in the NCR, including the DC Facility." DEIS at ES-1, 1-3; FEIS at ES-1, 1-3.

Regardless, utility work is part of the Project, even if it is off-site. Treasury completed the Conceptual Site Layouts & Utility Study Beltsville Agricultural Research Center in January 2020 and the Transportation Impact Study (TIS) in June 2020. Treasury states in the FEIS that approximately 1 mile (about 4,600 to 5,600 linear feet) of new force main may need to be constructed to tie the CPF's sanitary sewer system into the USDA's

existing lines south of the project site, FEIS Cumulative Effects Technical Memorandum at 6, and transportation mitigation at specific local intersections has been recommended in the TIS. Treasury has not presented a sufficient explanation of why these impacts are not ripe for evaluation.

Refusing to consider these impacts would not, moreover, be an appropriate use of tiering, particularly if a final decision is made or construction were to begin without the evaluation of these other impacts. Although it is acceptable to recognize that aspects of a project remain unknown or undetermined, Treasury has already considered some of these issues, along with the locations and the nature of proposed or anticipated off-site utility work, and recommended traffic mitigation measures. The NEPA process should begin at the early planning stages of a project, and it would render NEPA an absurdity if an agency could use the early stage of a project as an excuse from fully considering the project's environmental impacts.

The FEIS fails to account for information in the Baltimore-Washington SCMAGLEV DEIS

More than 4,000 pages of analysis were completed for the recently-released SCMAGLEV DEIS, but only limited information regarding the cumulative impacts of the SCMAGLEV combined with those of the CPF has been incorporated into the FEIS. Where the FEIS does mention the SCMAGLEV, the tendency is to make broad conclusory statements supported by no evidence. For example, the FEIS states, "Construction of the Proposed Action and large-scale past, present, and reasonably foreseeable future projects, such as MAGLEV, would require clearing and ground disturbing activities; collectively increasing air emissions, noise levels, and soil erosion in the ROI; as well as disturbing soils, wildlife, and vegetation; increasing stormwater runoff; and using hazardous materials." FEIS at 4-4. "Conclusory statements that the indirect and cumulative effects will be minimal or that such effects are inevitable are insufficient under NEPA." *N.C. Wildlife Fed'n v. N.C. Dep't of Transp.*, 677 F.3d 596, 602 (4th Cir. 2012). Instead, an EIS must include a "useful analysis of the cumulative impacts of past, present and future projects." *City of Carmel-By-The-Sea v. U.S. Dept. of Transp.*, 123 F.3d 1142, 1160 (9th Cir. 1997); *accord Ocean Advocs. v. U.S. Army Corps of Eng's*, 402 F.3d 846, 868 (9th Cir. 2005) ("an agency must provide 'some quantified or detailed information; . . . [g]eneral statements about possible effects and some risk do not constitute a hard look absent a justification regarding why more definitive information could not be provided.'") (quoting *Neighbors of Cuddy Mountain v. U.S. Forest Serv.*, 137 F.3d 1372, 1379-80 (9th Cir. 1998)).

In most instances, the FEIS appears not to consider the SCMAGLEV project at all in terms of cumulative effects. Despite the fact that two of the three alternative locations proposed in the SCMAGLEV DEIS for a 180-acre trainset maintenance facility (TMF) are on BARC, and one of these TMF alternatives (BARC West, the SCMAGLEV Project Sponsor's preferred alternative) is immediately to the east of this Project's subject parcel, the FEIS fails to even mention (let alone provide specific information on) the SCMAGLEV in terms of the two projects' cumulative effects on the following: Land Use, Visual Resources, Air Quality, Noise, Topography and Soils, Water Resources, Utilities, Socioeconomics and Environmental Justice, Hazardous and Toxic Materials and Waste, and Human Health and

Safety. The SCMAGLEV is mentioned only by name in terms of Cultural Resources (“Other actions proposed for development in the BARC Historic District include infrastructure improvement projects, such as MAGLEV, Route 201, and Sunnyside Avenue Bridge Replacement.” FEIS Cumulative Effects Analysis Technical Memorandum at 15.).

While more quantitative data pertaining to the SCMAGLEV project is provided in the Biological Resources section of the cumulative effects analysis, the details pertain to impacts on forest and forest interior dwelling species (FIDS) only; further, an entire paragraph is dedicated to consideration of forest/FIDS impacts of the BARC Airstrip TMF alternative site, but the more proximal TMF alternative, BARC West, is not mentioned. FEIS Cumulative Effects Analysis Technical Memorandum at 15.

Perhaps more concerning is the FEIS’s analysis of the data: Rather than using the specific data to provide the public and decision-makers with an unbiased analysis of cumulative impacts, the FEIS instead compares the potential impacts of Treasury’s Preferred Alternative to those of the SCMAGLEV, drawing conclusions about the CPF’s lesser “contribution” to cumulative effects. The FEIS states:

As previously mentioned, the MAGLEV project could permanently impact a total of up to 451 acres of forest within the entire MAGLEV project area including a 30-foot buffer, depending on which Build Alternative is selected. Of these permanent forest impacts, up to 160 acres could occur at BARC. *In comparison, the Proposed Action would result in the removal of only 3.6 acres of forest land within BARC. ... Cumulative impacts on vegetation would not be significant, however, due to the Proposed Action’s incremental effect from removing only 3.6 acres of forest. When considered with other projects, such as MAGLEV, the Proposed Action’s contribution to forest impacts would be minimal, and the Proposed Action would include implementation of EPMS and RCMs to ensure adverse impacts to forest resources in the ROI would remain less than significant.*

FEIS Cumulative Effects Analysis Technical Memorandum at 15 (emphasis added).

The purpose of the cumulative effects analysis is not to compare and contrast past, present, and reasonably foreseeable projects, nor to lessen the perceived impact of the proposed Project. Instead, “A meaningful cumulative impact analysis must identify (1) the area in which the effects of the proposed project will be felt; (2) the impacts that are expected in that area from the proposed project; (3) other actions—past, present, and proposed, and reasonably foreseeable—that have had or are expected to have impacts in the same area; (4) the impacts or expected impacts from these other actions; and (5) the overall impact that can be expected if the individual impacts are allowed to accumulate.” *Del. Riverkeeper Network*, 753 F.3d at 1319 (quoting *Grand Canyon Trust v. FAA*, 290 F.3d 339, 345 (D.C. Cir. 2002)). The cumulative impact discussion in the FEIS and Technical Memorandum does not do this and an adequate cumulative impacts analysis must be undertaken before Treasury makes a decision on the Project.

One area of particular concern to the City is the cumulative effects of the Project on local roadways. The construction and operation of the CPF and the SCMAGLEV will have tremendous combined impact on the local road network, yet the BEP FEIS fails to address this concern. In terms of construction effects, the Cumulative Effects Analysis Technical Memorandum states:

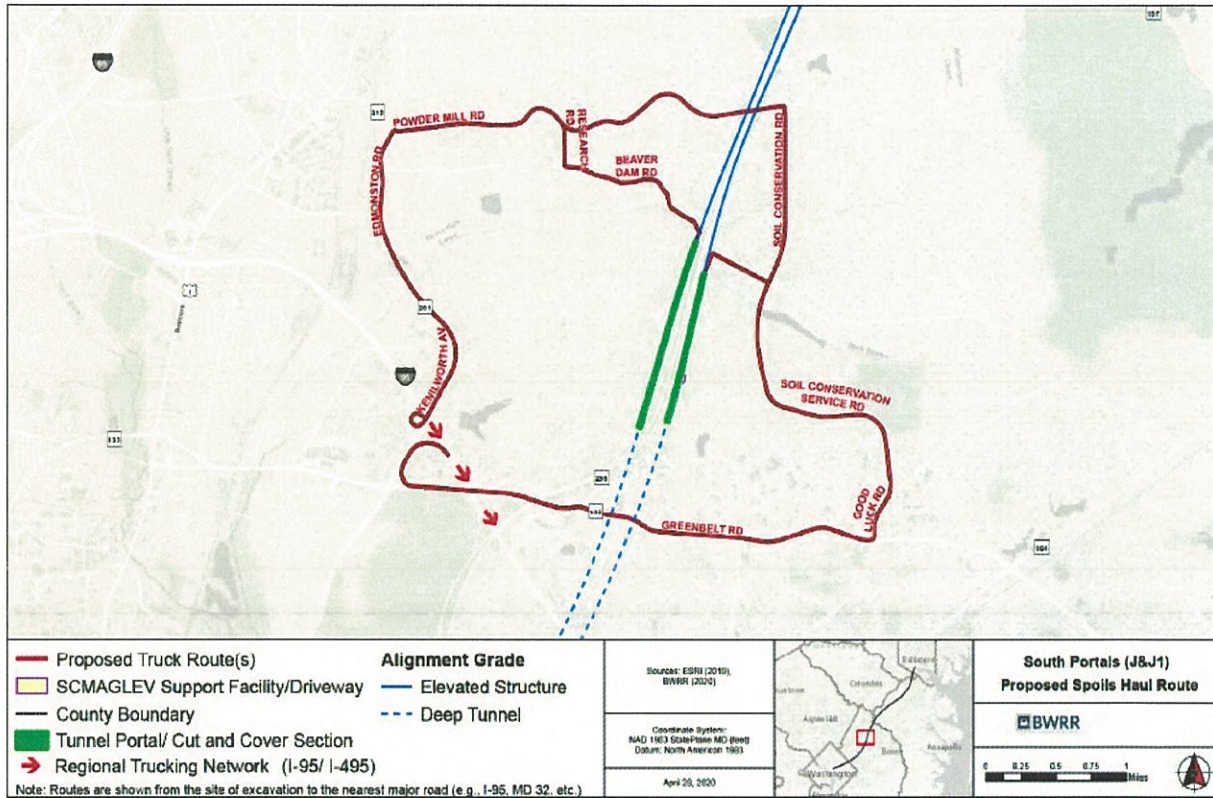
The Preferred Alternative's contribution to cumulative traffic congestion on local roadways, however, would be temporary and relatively minor compared to existing daily traffic, resulting in less-than-significant adverse cumulative impacts on traffic in the ROI. In addition, traffic and transportation impacts are generally localized and would likely be readily absorbed by the existing road capacity.

FEIS Cumulative Effects Analysis Technical Memorandum at 16. The Cumulative Impacts analysis relies on general conclusory statements, including, "Construction and operation of the Preferred Alternative considered with past, present, and reasonably foreseeable future projects would result in short- and long-term increases in roadway users and traffic that would be readily absorbed by existing and future road capacity but that could make Powder Mill Road less appealing to bicyclists." FEIS at 4-5.

The one mention of the SCMAGLEV project in the Cumulative Effects Technical Memorandum Traffic and Transportation section indicates, without explanation or further analysis, that it may "increase public transit capacity and alternatives in the region to further alleviate any additional strain." FEIS Cumulative Effects Analysis Technical Memorandum at 17. However, the SCMAGLEV DEIS tells a different story. The SCMAGLEV DEIS documents significant negative construction impacts, particularly from increased traffic. These impacts are not fully analyzed in the SCMAGLEV DEIS but include hundreds of trucks per day traveling to and from multiple nearby locations for seven years. Many of the same impacted roadways will also be impacted by construction and operation of the CPF should it be located at BARC. For example, it is expected that construction of a TMF will require 100 trucks a day or more over the seven-year construction period – a construction period which coincides with the construction period for the CPF. This is of particular concern to the City of Greenbelt, as two of the three TMF options are near the City on BARC. There would also be significant traffic impacts in and around the City from construction of the southern portal and southern viaduct.

The SCMAGLEV DEIS Transportation Technical Appendix Table D.2-33 presents estimated truck and auto trips by work site. One of the eight pages in this table is reproduced below. These truck trips would have a major impact on local roads in and around the City because, as the DEIS states: "No commercial or construction vehicles/trucks will be allowed on the BW Parkway." SCMAGLEV DEIS App. G7 at PDF p. 95. Circuitous routing required for construction of the southern portal is shown in the figure below. Construction trucks for both projects will not be permitted on the BW Parkway and instead would be routed onto local roads, some of which already are severely congested. There also would be many temporary road closures in the area.

Construction Planning Memorandum Figure 26, Proposed Haul Route for South Portal (Alignment Alternative J & J1)⁴



As shown in the figure above, the routing includes running north of the City through BARC, to the east of the City on Soil Conservation Road, and directly through the City on Edmonston/Kenilworth Road and Greenbelt Road. Treasury will recognize that many of these roads (including Powder Mill Road, which Treasury proposes to modify) are the same roads that will be used for construction and operation of the CPF. The SCMAGLEV DEIS estimates that trucks would be moving excavated materials along this route 24 hours a day for 27 months, with 145 estimated truck trip per day for Alternative J and 240 truck trips per day for Alternative J1. SCMAGLEV DEIS App. G7 at PDF p. 108 Tables 22 and 23.

⁴ SCMAGLEV DEIS App. G7 at PDF p.136.

Estimated Truck and Auto Trips by Work Site During SCMAGLEV Construction (1 page of 8)⁵

Work Site Location	Alignment Alternative	Approx. Alignment Stationing	Work Element	Duration (Months)	Construction Time Period	Workday Length	Roadways Impacted (see current conditions)	Truck Trips per Day	Worker Vehicle Arrivals Per Day
Camden Yards Station	J, J1	207+300	Camden Yards Station Civil Construction	48	Years 2 to 7	7AM - 4 PM	Interstate 395, Conway Street, Pratt Street, Howard Street, Lombard Street	200-250	150
			Camden Yards Station Architectural Construction	24	Years 2 to 7	7AM - 4 PM	Interstate 395, Conway Street, Pratt Street, Howard Street, Lombard Street	100	100
BARC West TMF Site (materials delivery from Powder Mill Road in vicinity of Research Road) - Prince George's County	n/a		BARC West TMF Site Construction	78	Years 1 to 7	7AM - 4 PM	Powder Mill Road	100	150
			BARC West TMF Site Substations (2 substations)	24	Years 2 to 6	7AM - 4 PM	Powder Mill Road	6	100
			MOW Facility Construction	24	Years 2 to 6	7AM - 4 PM	Powder Mill Road	6	100
BARC Airstrip TMF Site (materials delivery from Springfield Road) - Prince George's County	n/a		BARC Airstrip TMF Site Construction	78	Years 1 to 7	7AM - 4 PM	Springfield Road	100	150
			BARC Airstrip TMF Site Substations (2 substations)	24	Years 2 to 6	7AM - 4 PM	Springfield Road	6	100
			MOW Facility Construction	24	Years 2 to 6	7AM - 4 PM	Powder Mill Road	6	100
BARC 198 TMF Site (materials delivery from Old Portland Road via MD 198)	n/a		MD 198 TMF Site Construction	90	Years 1 to 7	7AM - 4 PM	Old Portland Road Extended	100	150
			BARC Airstrip/MD 198 TMF Site Substations (2 substations)	24	Years 2 to 6	7AM - 4 PM	Old Portland Road Extended	6	100

Source: BWRR Construction Reports

⁵ SCMAGLEV DEIS App. D.2 at A-91.

In addition to the construction of the TMF and tunnel portal, there would be many temporary closures and detours, which would inconvenience residents and increase congestion and create a greater cumulative effect when combined with the trips generated by the construction and operation of the CPF. The following road segments in the Greenbelt area would be subject to traffic impacts due to the SCMAGLEV's southern viaduct construction, SCMAGLEV DEIS App. G7 at PDF p. 93 Tables 13 and 14, and possibly BARC TMF ramp construction, SCMAGLEV DEIS App. G7 at PDF p. 94-95 Tables 15 and 15 at 94-95, as shown in DEIS Appendix G Part I:

- Traffic from NB Baltimore-Washington Parkway/MD 295 to Explorer Road will be detoured via Greenbelt Road/MD 193 and Goddard Road (p. 13).
- Traffic from Explorer Road to the Baltimore-Washington Parkway/MD 295 will be detoured via Goddard Road and Greenbelt Road/MD 193 (p. 13).
- Traffic from NB Baltimore-Washington Parkway/MD 295 will be detoured via the Capital Beltway, Edmonston Road/MD 201, and Powder Mill Road (p. 14-15).
- Traffic from Greenbelt Road/MD 193 will be detoured via Edmonston Road/MD 201 and Powder Mill Road (p. 14-15).
- Traffic from SB Baltimore-Washington Parkway/MD 295 will be detoured via Power Mill Road, Edmonston Road/MD 201, and the Capital Beltway (p. 16-17).
- Beaver Dam Road closure between Research Road and Soil Conservation Road. Beaver Dam Road traffic will be detoured via Research Road, Power Mill Road and Soil Conservation Road (p. 18-21).
- Soil Conservation Road closure between Power Mill Road and Beaver Dam Road. Soil Conservation Road will be detoured via Power Mill Road, Research Road, and Beaver Dam Road (p. 22).
- Springfield Road closure between Power Mill Road and Beaver Dam Road. Springfield Road traffic will be detoured via Powder Mill Road, Soil Conservation Road, and Beaver Dam Road (p. 23).
- Springfield Road closure between Powder Mill Road and Odell Road. Springfield Road traffic will be detoured via Power Mill Road, Poultry Road, and Odell Road (p. 24). This does not seem possible as Poultry Road is the proposed location of the Bureau of Engraving and Printing facility and a secured entry off of Powder Mill Road is proposed. Poultry Road is currently closed to the public and has had a closed gate at its northern terminus (the intersection with Odell Road) for years.

The Baltimore-Washington SCMAGLEV DEIS has many errors and omissions, as the City pointed out in its comments on the DEIS for that project; however, the shortcomings of the SCMAGLEV DEIS do not excuse Treasury's failure to utilize and account for relevant data contained in that analysis in its own assessment of cumulative impacts.

Northern Long-Eared Bat

The FEIS states that construction "may affect" the federally threatened Northern Long-Eared Bat and that potential suitable roosting habitat occurs on-site. FEIS at 2-28, 3-46. Treasury relies on a determination that a "take" under the Project would not be

prohibited by the ESA based on a Section 4(d) rule adopted for the Northern Long-Eared Bat. FEIS at 3-46.

However, the FEIS ignores that since the DEIS was released, and since this determination was made, a court has overturned the Fish and Wildlife Service's (FWS's) decision to list the species as threatened rather than endangered, finding that the FWS had failed both to explain why the species was not endangered after suffering catastrophic declines in the core of its range as a result of white-nose syndrome and to consider the cumulative effects of habitat destruction. *Center for Biological Diversity v. Everson*, No. 15-477 (EGS) (D.D.C. Jan. 28, 2020). The FWS is currently working on a "Special Status Assessment" for the Bat, which it told the court it anticipated completing it by May 2021; the court ordered the FWS to issue a new listing determination within eighteen months (presumably by December 2022) of the Assessment. *Center for Biological Diversity v. Everson*, No. 15-477 (EGS) (D.D.C. Mar. 1, 2021). The Northern-Long Eared Bat will likely be listed as endangered. Treasury should not make its decision on the Project based on out-of-date information that the FEIS says permits a "take" of the species; at a minimum Treasury must evaluate FWS Special Status Assessment for the species, and the expected final listing of the species.


Conclusion

In conclusion, as with the DEIS, the City believes that the FEIS fails to comply with NEPA. Its many shortcomings warrant the release of a supplemental EIS prior to issuance of the ROD or any further action to proceed with the Project. Thank you for the opportunity to comment. If you have any questions please contact Terri Hrubby, Director of Planning and Community Development, at 301-345-5417.

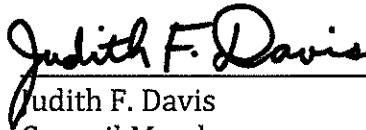
Sincerely,




Colin A. Byrd
Mayor



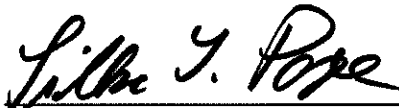
Emmett V. Jordan
Mayor Pro Tem




Judith F. Davis
Council Member



Leta M. Mach
Council Member



Silke I. Pope
Council Member



Edward V.J. Putens
Council Member



Rodney M. Roberts
Council Member

cc: Governor Larry Hogan
Senator Ben Cardin
Senator Chris Van Hollen
Representative Steny Hoyer
Senator Paul Pinsky
Delegate Anne Healey
Delegate Alonzo Washington
Delegate Nicole Williams
County Executive Angela Alsobrooks
Council Member Todd Turner
Council Member Thomas Dernoga
Greenbelt City Council
Nicole Ard, City Manager
Tim George, Assistant City Manager
Terri Hruby, Director of Planning & Community Development
Mr. Chuck Davis, BEP
Dr. Howard Zhang, BARC
Mr. Chris Bentley, BARC