
APPENDIX C

REVIEW OF THE DRAFT EIS

Federal Register Draft EIS Notice of Availability (NOA)

Federal Register/Vol. 75, No. 122/Friday, June 25, 2010/Notices

36371

Deletions

Regulatory Flexibility Act Certification

I certify that the following action will not have a significant impact on a substantial number of small entities. The major factors considered for this certification were:

1. If approved, the action will not result in additional reporting, recordkeeping or other compliance requirements for small entities.
2. If approved, the action may result in authorizing small entities to furnish a product and a service to the Government.
3. There are no known regulatory alternatives which would accomplish the objectives of the Javits-Wagner-O'Day Act (41 U.S.C. 46-48c) in connection with a product and a service proposed for deletion from the Procurement List.

End of Certification

The following product and service are proposed for deletion from the Procurement List:

Product

Paper Holder & Micro Note Holder

NSN: 7510-01-484-0011
NPA: The Lighthouse for the Blind, Inc. (Seattle Lighthouse), Seattle, WA
Contracting Activity: Federal Acquisition Service, GSA/FSS OFC SUP CTR--Paper Products, New York, NY

Service

Service Type/Location: Facilities Maintenance, NASA Dryden Flight Research Center, Edwards, CA
NPA: PRIDE Industries, Roseville, CA
Contracting Activity: National Aeronautics and Space Administration, NASA Headquarters, Washington, DC

Patricia Briscoe,

Deputy Director, Business Operations.
[FR Doc. 2010-15489 Filed 6-24-10; 8:45 am]
BILLING CODE 6351-01-P

COMMODITY FUTURES TRADING COMMISSION

Agency Information Collection Activities Under OMB Review

AGENCY: Commodity Futures Trading Commission.

ACTION: Notice; Information Collection 3038-0019, Stocks of Grain in Licensed Warehouses.

SUMMARY: In compliance with the Paperwork Reduction Act (44 U.S.C. 3501 *et seq.*), this notice announces that the Information Collection Request (ICR) abstracted below has been forwarded to the Office of Management and Budget

(OMB) for review and comment. The ICR describes the nature of the information collection and its expected costs and burden; it includes the actual data collection instruments [if any].

DATES: Comments must be submitted on or before July 26, 2010.

FOR FURTHER INFORMATION OR A COPY CONTACT: Gary Martinaitis at CFTC, (202) 418-5209; FAX: (202) 418-5527; e-mail: gmartinaitis@cftc.gov and refer to OMB Control No. 3038-0019.

SUPPLEMENTARY INFORMATION:

Title: Stocks of Grain in Licensed Warehouses, OMB Control No. 3038-0019.

This is a request for extension of a currently approved information collection.

Abstract: Under Commission Regulation 1.44, 17 CFR 1.44, contract markets must require operators of warehouses regular for delivery to keep records on stocks of commodities and make reports on call by the Commission. The regulation is designed to assist the Commission in prevention of market manipulation and is promulgated pursuant to the Commission's rulemaking authority contained in section 5a of the Commodity Exchange Act, 7 U.S.C. 7a.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for the CFTC's regulations were published on December 30, 1981. See 46 FR 63035 (Dec. 30, 1981). The **Federal Register** notice with a 60-day comment period soliciting comments on this collection of information was published on April 13, 2010 (75 FR 18824).

Burden statement: The respondent burden for this collection is estimated to average 1 hour per response. This estimate includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; and transmit or otherwise disclose the information.

Respondents/Affected Entities: 3.
Estimated number of responses: 156.

Estimated total annual burden on respondents: 156 hours.

Frequency of collection: Weekly.

Send comments regarding the burden estimated or any other aspect of the

information collection, including suggestions for reducing the burden, to the addresses listed below. Please refer to OMB Control No. 3038-0019 in any correspondence.

Gary Martinaitis, Commodity Futures Trading Commission, 1155 21st Street, NW., Washington, DC 20581 and Office of Information and Regulatory Affairs, Office of Management and Budget, Attention: Desk Office for CFTC, 725 17th Street, Washington, DC 20503.

Issued in Washington, DC, on June 21, 2010.

David A. Stawick,

Secretary of the Commission.

[FR Doc. 2010-15377 Filed 6-24-10; 8:45 am]

BILLING CODE 6351-01-P

DEPARTMENT OF DEFENSE

Office of the Secretary

Draft Environmental Impact Statement Addressing Campus Development at Fort Meade, MD

AGENCY: Department of Defense (DoD).
ACTION: Notice of availability; notice of public meeting; request for comments.

SUMMARY: The Department of Defense (DOD) announces the availability of the Draft Environmental Impact Statement (EIS) as part of the environmental planning process for a Campus Development Project at Fort George G. Meade, Maryland (hereafter referred to as Fort Meade). The DOD proposes the development of a portion of Fort Meade (referred to as "Site M") as an operational complex and to construct and operate consolidated facilities to meet the National Security Agency's (NSA) continually evolving requirements and for Intelligence Community use. The purpose of the proposed action is to provide facilities that are fully-supportive of the Intelligence Community's mission. The action is driven by the need to co-locate key partnering organizations to ensure required capabilities for current and future missions are achieved.

This notice announces a 45-day comment period and provides information on how to participate in the public review process. The public comment period for the Draft EIS will officially end 45 days after publication of U.S. Environmental Protection Agency's Notice of Availability in the **Federal Register**.

DATES: There will be an open house beginning at 4:30 p.m. followed by a public meeting from 5 p.m. to 7 p.m. on July 21, 2010 (see **ADDRESSES** for meeting location). The public meeting

may end earlier or later than the stated time depending on the number of persons wishing to speak. All materials that are submitted in response to the Draft EIS should be received by August 13, 2010, to provide sufficient time to be considered in preparation of the Final EIS.

ADDRESSES: Copies of the Draft EIS are available for your review at the Fort Meade Main Post Library, 4418 Llewellyn Avenue, Fort Meade, MD 20755. You may also call (301) 688-2970 or send an e-mail to CampusEIS@hdrinc.com to request a copy of the Draft EIS.

The open house and scoping meeting will be held at the Fort Meade Middle School, 1103 26th Street, Fort Meade, Maryland 20755. Oral and written comments will be accepted at the scoping meeting. You can also submit written comments to "Campus Development EIS" c/o HDR|e²M, 2751 Prosperity Avenue, Suite 200, Fairfax, VA 22031 or submitted by e-mail to CampusEIS@hdrinc.com.

FOR FURTHER INFORMATION CONTACT: Mr. Jeffrey Williams at (301) 688-2970, or e-mail jdwill2@nsa.gov.

SUPPLEMENTARY INFORMATION:

Background: The NSA is a tenant DOD agency on Fort Meade. NSA is a high-technology organization that is on the frontier of communications and data processing. In order to meet evolving mission requirements, the development of a modern operational complex is needed at the NSA campus on Fort Meade.

Proposed Action and Alternatives: The Campus Development Project was initiated to provide a modern operational complex to meet the evolving mission requirements of NSA and the Intelligence Community. Development is proposed for a portion of Fort Meade (referred to as "Site M") adjacent to the NSA campus. Site M is divided into northern (Site M-1, 137 acres) and southern (Site M-2, 90 acres) portions. DOD proposes that development of Site M occur in three option phases over a horizon of approximately 20 years.

• **Proposed Action (Phase I).** Development would occur in the near term (approximately 2012 to 2014) on the eastern half of Site M-1, supporting 1.8 million square feet (ft²) of facilities for NSA to consolidate mission elements, enabling services, and support services across the campus based on function; servicing the need for more collaborative environment and optimal adjacencies, including associated infrastructure (e.g., electrical substation and generator plants providing 50

megawatts of electricity) and administrative functions for up to 6,500 personnel. This phase would also include a steam and chilled water plant, water storage tower, and electrical substations and generator facilities capable of supporting the entire operational complex on Site M.

• **Alternative 1 (Phases I and II).** Alternative 1 would include the implementation of the Proposed Action (Phase I) along with Phase II. Phase II would occur in the mid-term (approximately 2020) on the western half of Site M-1, supporting 1.2 million ft² of administrative facilities.

• **Alternative 2 (Phases I, II, and III).** Alternative 2 would include the implementation of the Proposed Action (Phase I) along with Phases II and III. Development would occur on Site M-2 in the long term (approximately 2029), supporting an additional 2.8 million ft² of administrative facilities, bringing built space to 5.8 million ft² for up to 11,000 personnel.

Alternatives identified include each of the development phases identified above, as well as three options for redundant emergency backup power generation and various pollution control systems. The No Action Alternative (not undertaking the Campus Development Project) will also be analyzed in detail.

Summary of Environmental Impacts: The level of potential environmental impacts resulting from the Proposed Action and alternatives would primarily be dependent on the alternative ultimately selected. Environmental impacts would generally be more adverse for Alternatives 1 and 2 than for the Proposed Action due to the increase in building footprint and the number of additional personnel associated with the alternatives.

Generally, construction and demolition activities would be expected to result in some amount of ground disturbance. Short-term adverse on-site impacts on soil and water resources as a result of sedimentation, erosion, and storm water runoff are unavoidable. Construction and demolition activities also generate solid waste. These kinds of impacts would be expected regardless of the alternative chosen. Long-term operation of the complex would be expected to result in negligible to moderate impacts on land use, transportation, noise, air quality, biological resources, infrastructure, hazardous materials and waste, and socioeconomic resources. Potential significant impacts on cultural resources could occur under Alternative 2 if potentially historic properties are not treated as a design constraint and avoided.

Best Management Practices and Mitigation Measures. The Proposed Action has the potential to result in adverse environmental impacts. The Proposed Action includes best management practices, mitigation measures, and design concepts to avoid adverse impacts to the extent practicable. Unavoidable impacts would be minimized or compensated for, to the extent practicable. In accordance with Council on Environmental Quality regulations, mitigation measures must be considered for adverse environmental impacts. Once a particular impact associated with a proposed action is considered significant, then mitigation measures must be developed where it is feasible to do so.

Copies of the Draft EIS are available for public review at local repositories and by request (see **ADDRESSES**). The DOD invites public and agency input on the Draft EIS. Please submit comments and materials during the 45-day public review period to allow sufficient time for consideration in development of the Final EIS (see **DATES**).

Dated: June 22, 2010.

Mitchell S. Bryman,

Alternate OSD Federal Register Liaison Officer, Department of Defense.

[FR Doc. 2010-15457 Filed 6-24-10; 8:45 am]

BILLING CODE 5001-06-P

DEPARTMENT OF DEFENSE

Office of the Secretary

Advisory Panel on Department of Defense Capabilities for Support of Civil Authorities After Certain Incidents

AGENCY: Office of the Assistant Secretary of Defense (Homeland Defense and America's Security Affairs), DoD.
ACTION: Notice of multiple meetings by audio teleconference.

SUMMARY: Under the provisions of the Federal Advisory Committee Act of 1972 (5 U.S.C., Appendix, as amended), the Government in the Sunshine Act of 1976 (5 U.S.C. 552b, as amended), and 41 CFR 102-3.150, the Department of Defense announces that the Advisory Panel on Department of Defense Capabilities for Support of Civil Authorities after Certain Incidents (hereinafter referred to as the Advisory Panel) will take place by audio teleconference on July 7, 8, 9, and 12, 2010.

DATES: The meetings will be held: Wednesday, July 7, 2010, from 11:00 a.m. to 5:30 p.m., Eastern Daylight Time (hereinafter referred to as EDT).

SUPPLEMENTARY INFORMATION: On May 7, 2010, EPA published a notice that the Commonwealth of Massachusetts had petitioned the Regional Administrator, Environmental Protection Agency, to determine that adequate facilities for the safe and sanitary removal and treatment of sewage from all vessels are reasonably available for the waters of Pleasant Bay/Chatham Harbor. Three comments were received on this petition. The response to comments can be obtained utilizing the above contact information.

The petition was filed pursuant to Section 312 (f) (3) of Public Law 92-500, as amended by Public Laws 95-217 and 100-4, for the purpose of declaring these waters a No Discharge Area (NDA).

Section 312 (f) (3) states: After the effective date of the initial standards and regulations promulgated under this section, if any State determines that the protection and enhancement of the quality of some or all of the waters within such State require greater environmental protection, such State

may completely prohibit the discharge from all vessels of any sewage, whether treated or not, into such waters, except that no such prohibition shall apply until the Administrator determines that adequate facilities for the safe and sanitary removal and treatment of sewage from all vessels are reasonably available for such water to which such prohibition would apply.

This Notice of Determination is for the waters of Pleasant Bay/Chatham Harbor. The NDA boundaries are as follows:

Waterbody/General area	From latitude	From longitude	To latitude	To longitude
Bounded on the west by mainland Chatham, Harwich, Brewster and Orleans; bounded on the east by Nauset Beach (North Beach) and North Beach Island. A line drawn cross the mouth of the North inlet across from Minister's Point.	41°42'19.43" N.	69°55'44.76" W.	41°42'13.31" N.	69°55'45.11" W.
From West of a line across the mouth of the South Inlet:	41°40'41.51" N.	69°56'3.47" W.	41°39'56.52" N.	69°56'30.48" W.

The area includes the municipal waters of Chatham, Harwich, Brewster and Orleans.

The information submitted to EPA by the Commonwealth of Massachusetts certifies that there are three pumpout facilities located within this area. A list of the facilities, with locations, phone numbers, and hours of operation is

appended at the end of this determination.

Based on the examination of the petition and its supporting documentation, and information from site visits conducted by EPA New England staff, EPA has determined that adequate facilities for the safe and sanitary removal and treatment of

sewage from all vessels are reasonably available for the area covered under this determination.

This determination is made pursuant to Section 312 (f) (3) of Public Law 92-500, as amended by Public laws 95-217 and 100-4.

PUMPOUT FACILITIES WITHIN THE NO DISCHARGE AREA

Name	Location	Contact info.	Hours	Mean low water depth
Pleasant Bay/Chatham Harbor				
Harbormaster	Round Cove Harwich	508-430-7532, VHF 60	On demand	N/A.
Harbormaster	Ryder's Cove Chatham	508-945-1067 or 508-945-5185, VHF 66.	M-F 8 a.m.-5 p.m., Sat. 9 a.m.-1 p.m.	3 ft.
Nauset Marine East	37 Barley Neck Road, East Orleans.	508-255-3045, VHF 9	On demand	3 ft.

Dated: June 24, 2010.
H. Curtis Spalding,
Regional Administrator, New England Region.
 [FR Doc. 2010-16174 Filed 7-1-10; 8:45 am]
 BILLING CODE 6560-50-P

ENVIRONMENTAL PROTECTION AGENCY

[ER-FRL-8991-2]

Environmental Impact Statements; Notice of Availability

Responsible Agency: Office of Federal Activities, General Information (202) 564-1399 or <http://www.epa.gov/compliance/nepa/>. Weekly receipt of Environmental Impact Statements. Filed 06/21/2010 through 06/25/210. Pursuant to 40 CFR 1506.9.

Notice

In accordance with Section 309(a) of the Clean Air Act, EPA is required to make its comments on EISs issued by other Federal agencies public. Historically, EPA has met this mandate by publishing weekly notices of availability of EPA comments, which includes a brief summary of EPA's comment letters, in the **Federal Register**. Since February 2008, EPA has been including its comment letters on EISs on its Web site at: <http://www.epa.gov/compliance/nepa/eisdata.html>. Including the entire EIS comment letters on the Web site satisfies the Section 309(a) requirement to make EPA's comments on EISs available to the public. Accordingly, on March 31, 2010, EPA discontinued the

publication of the notice of availability of EPA comments in the **Federal Register**.

EIS No. 20100236, Draft EIS, FERC, CA, Kilarc-Cow Creek Hydroelectric Project (FERC Project No. 606) Proposes to Surrender the License for Operation Project, Old Crow Creek and South Cow Creek, Shasta County, CA, Comment Period Ends: 08/16/2010, Contact: Mary O'Driscoll, 1-866-208-3372.

EIS No. 20100237, Final Supplement, BLM, NV, Newmont Gold Mining, South Operations Area Project Amendment, Updated Information on the Cumulative Effects Analyses, Operation and Expansion, Plan of Operations, Elko and Eureka Counties, NV, Wait Period Ends: 08/

- 02/2010. Contact: Deb McFarlane, 775-753-0200.
- EIS No. 20100238, Final Supplement, BLM, NV, Leeville Mining Project, Propose to Develop and Operate an Underground Mine and Ancillary Facilities including Dewatering Operation, Updated Information on the Cumulative Effects Analyses, Plan-of-Operations/Right-of-Way Permit and COE Section 404 Permit, Elko and Eureka Counties, NV, Wait Period Ends: 08/02/2010, Contact: Deb McFarlane, 775-753-0200.**
- EIS No. 20100239, Draft EIS, BPA, WA, Central Ferry-Lower Monumental 500-kilovolt Transmission Line Project, Proposing to Construct, Operate, and Maintain a 36 to 40-Mile-Long 500-kilovolt (kV) Transmission Line, Garfield, Columbia and Walla Walla Counties, WA, Comment Period Ends: 08/16/2010, Contact: Tish Eaton, 503-230-3469.**
- EIS No. 20100240, Draft EIS, USACE, CA, American River Watershed Common Features Project/Natomas Post-Authorization Change Report/Natomas Levee Improvement Program, Phase 4b Landside Improvements Project, Sacramento and Sutter Counties, CA, Comment Period Ends: 08/16/2010, Contact: Elizabeth G. Holland, 916-557-6763.**
- EIS No. 20100241, Draft EIS, USACE, CA, Sunridge Properties Project, Implementing Alternatives for Six Residential Development Project, City of Rancho Cordova, Sacramento County, CA, Comment Period Ends: 08/16/2010, Contact: Michael Jewell, 916-557-6605.**
- EIS No. 20100242, Draft EIS, NSA, MD, Fort George G. Meade, Maryland, to Address Campus Development, Site M as an Operational Complex and to Construct and Operate Consolidated Facilities for Intelligence Community Use, Fort George G. Meade, MD, Comment Period Ends: 08/16/2010, Contact: Jeffery William, 301-680-2870.**
- EIS No. 20100243, Draft EIS, FHWA, AL, I-85 Extension from I-59/I-20 near the Mississippi State Line to I-65 near Montgomery, Portion of Autauga, Dallas, Hale, Lowndes, Marengo, Montgomery, Perry, and Sumter Counties, AL, Comment Period Ends: 08/16/2010, Contact: Mark D. Bartlett, 334-274-6350.**
- Amended Notices**
- EIS No. 20100225, Draft EIS, BLM, NV, Winnemucca District Office Resource Management Plan, Humboldt, Pershing, Washoe, Lyon and**

Churchill Counties, NV, Comment Period Ends: 09/22/2010, Contact: Robert Edward, 775-623-1597. Revision to FR Notice Published 06/25/2010: Correction to Title.

EIS No. 20100234, Final EIS, USAF, 00, Shaw Air Base Airspace Training Initiative (ATI), 20th Fighter Wing, Proposal to Modify the Training Airspace Overlying Parts, South Carolina and Georgia, Wait Period Ends: 07/28/2010, Contact: Linda Devine, 757-764-9434. Revision to FR Notice Published 06/25/2010: Correction to Contact Person Telephone Number.

Dated: June 29, 2010.
Robert W. Hargrove,
 Director, NEPA Compliance Division, Office of Federal Activities.
 [FR Doc. 2010-16171 Filed 7-1-10; 8:45 am]
 BILLING CODE 4910-50-P

ENVIRONMENTAL PROTECTION AGENCY

[FRL-9170-7]

Notice of Meeting of the EPA's Children's Health Protection Advisory Committee (CHPAC)

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice of meeting.

SUMMARY: Pursuant to the provisions of the Federal Advisory Committee Act, Public Law 92-463, notice is hereby given that the next meeting of the Children's Health Protection Advisory Committee (CHPAC) will be held July 21 and 22, 2010 at the Ritz-Carlton Hotel, 1150 22nd Street, NW., Washington, DC. The CHPAC was created to advise the Environmental Protection Agency on science, regulations, and other issues relating to children's environmental health.

DATES: The CHPAC will meet July 21 and 22, 2010.

ADDRESSES: Ritz-Carlton Hotel, 1150 22nd Street, NW., Washington, DC.

FOR FURTHER INFORMATION CONTACT: Martha Berger, Office of Children's Health Protection, USEPA, MC 1107A, 1200 Pennsylvania Avenue, NW., Washington, DC 20460, (202) 564-2191, berger.martha@epa.gov.

SUPPLEMENTARY INFORMATION: The meetings of the CHPAC are open to the public. The CHPAC will meet on Wednesday, July 21 from 8:30 a.m. to 5 p.m., and Thursday, July 22 from 9 a.m. to 12:30 p.m. Agenda items include discussions on prenatal environmental exposures and indoor environments for children.

ACCESS AND ACCOMMODATIONS: For information on access or services for individuals with disabilities, please contact Martha Berger at 202-564-2191 or berger.martha@epa.gov, preferably at least 10 days prior to the meeting.

Dated: June 28, 2010.
Martha Berger,
 Designated Federal Official.

Draft Agenda—U.S. Environmental Protection Agency, Children's Health Protection Advisory Committee: July 21–22, 2010, The Ritz-Carlton Hotel, Salon IIIA, 1150 22nd St, NW., Washington, DC 20037: 202-074-5557.

Plenary Session Desired Outcomes

- Learn about new and ongoing activities at EPA and the Office of Children's Health Protection.
- Review work group efforts on indoor environments and prenatal exposures.
- Discuss potential interagency task force issues: Asthma disparities and chemical management.

Wednesday, July 21

- 8:00 Coffee.
 8:30–8:35 Review Meeting Agenda and Introductions.
 8:45–9:15 Highlights of Office of Children's Health Protection Activities, Peter Grevatt, Director OCHP.
 9:15–10:15 Indoor Environments Work Group, Tyra Bryant-Stephens and Janice Dhonau, Co-chairs, Mathew Davis, EPA lead.
 10:15–10:30 Break.
 10:30–11:30 Prenatal Exposures Work Group, Amy Kyle and Nancy Clark, Co-chairs, Michael Firestone, EPA lead.
 11:30–12:30 EPA's voluntary lead testing in drinking water initiative, Office of Water.
 12:30–2:15 LUNCH (on your own).
 2:15–3:15 Asthma Disparities Group Discussion.
 3:15–3:30 Break.
 3:30–4:30 Asthma Disparities Discussion, continued.
 4:30 PUBLIC COMMENT.
 5:00 ADJOURN.

Thursday, July 22

- 8:30 Coffee.
 9:00–9:15 Check in and Agenda Review.
 9:15–10:15 Chemicals Management Group Discussion.
 10:15–10:30 Break.
 10:30–11:30 Chemicals Management Discussion, continued.
 11:30–12:00 Review and Next Steps.
 12:00 ADJOURN.

[FR Doc. 2010-16177 Filed 7-1-10; 8:45 am]
 BILLING CODE 6560-50-P

Draft EIS NOA Newspaper Advertisements

The notice below was published in the Special Notices section of the *Baltimore Sun* on July 2, 2010.

**Notice of Availability and Request for Comments:
Environmental Impact Statement (EIS)
Addressing Campus Development at Fort Meade**

The Department of Defense (DOD) announces the availability of the Draft Environmental Impact Statement (EIS) as part of the environmental planning process for a Campus Development Project at Fort George G. Meade, Maryland (hereafter referred to as Fort Meade). The DOD proposes the development of a portion of Fort Meade (referred to as "Site M") as an operational complex and to construct and operate consolidated facilities to meet the National Security Agency's (NSA) continually evolving requirements and for Intelligence Community use. The purpose of the Proposed Action is to provide facilities that are fully-supportive of the Intelligence Community's mission. The action is driven by the need to co-locate key partnering organizations to ensure required capabilities for current and future missions are achieved. The EIS will consider three alternative development options, in which total build-out could reach 5.8 million square feet, and the No Action Alternative.

The DOD invites public and agency input on the Draft EIS. Copies of the Draft EIS are available for your review at the Fort Meade Main Post Library, 4418 Llewellyn Avenue, Fort Meade, MD 20755; the Anne Arundel County Public Library North County Area Branch, 1010 Eastway, Glen Burnie, MD 21060; and the Anne Arundel County Public Library West County Area Branch, 1325 Annapolis Road, Odenton, MD 21113. You may also call (301) 688-6524 or send an email to CampusEIS@hdrinc.com to request a copy of the Draft EIS.

On July 21, 2010, the DOD will hold an open house from 4:30 to 5:00 p.m. and a public meeting from 5:00 to 7:00 p.m. at the Fort Meade Middle School, 1103 26th Street, Fort Meade, Maryland 20755. The public meeting may end earlier or later than the stated time depending on the number of persons wishing to speak. Oral and written comments will be accepted at the public meeting. You can also submit written comments to "Campus Development EIS" c/o HDR|e|M, 2600 Park Tower Dr, Suite 100, Vienna, VA 22180 or submitted by email to CampusEIS@hdrinc.com. Written comments are requested by August 16, 2010, to ensure sufficient time to consider public input in preparation of the Final EIS.

Your comments on this Proposed Action are requested. Written and oral comments may be published in the EIS. Any personal information provided will be used only to identify your desire to make a statement during the public comment portions of the EIS process or to fulfill requests for copies of the EIS or associated documents. Private addresses will be compiled to develop a mailing list for those requesting copies of the Draft or Final EIS. However, only the names of private citizens will appear in the EIS; personal addresses and phone numbers will not be published.

The notice below was published on page A2 in the *Washington Post* on July 2, 2010.

**Notice of Availability and Request for Comments:
Environmental Impact Statement (EIS)
Addressing Campus Development at Fort Meade**

The Department of Defense (DOD) announces the availability of the Draft Environmental Impact Statement (EIS) as part of the environmental planning process for a Campus Development Project at Fort George G. Meade, Maryland (hereafter referred to as Fort Meade). The DOD proposes the development of a portion of Fort Meade (referred to as "Site M") as an operational complex and to construct and operate consolidated facilities to meet the National Security Agency's (NSA) continually evolving requirements and for Intelligence Community use. The purpose of the Proposed Action is to provide facilities that are fully-supportive of the Intelligence Community's mission. The action is driven by the need to co-locate key partnering organizations to ensure required capabilities for current and future missions are achieved. The EIS will consider three alternative development options, in which total build-out could reach 5.8 million square feet, and the No Action Alternative.

The DOD invites public and agency input on the Draft EIS. Copies of the Draft EIS are available for your review at the Fort Meade Main Post Library, 4418 Llewellyn Avenue, Fort Meade, MD 20755; the Anne Arundel County Public Library North County Area Branch, 1010 Eastway, Glen Burnie, MD 21060; and the Anne Arundel County Public Library West County Area Branch, 1325 Annapolis Road, Odenton, MD 21113. You may also call (301) 688-6524 or send an email to CampusEIS@hdrinc.com to request a copy of the Draft EIS.

On July 21, 2010, the DOD will hold an open house from 4:30 to 5:00 p.m. and a public meeting from 5:00 to 7:00 p.m. at the Fort Meade Middle School, 1103 26th Street, Fort Meade, Maryland 20755. The public meeting may end earlier or later than the stated time depending on the number of persons wishing to speak. Oral and written comments will be accepted at the public meeting. You can also submit written comments to "Campus Development EIS" c/o HDR|e|M, 2600 Park Tower Dr, Suite 100, Vienna, VA 22180 or submitted by email to CampusEIS@hdrinc.com. Written comments are requested by August 16, 2010, to ensure sufficient time to consider public input in preparation of the Final EIS.

Your comments on this Proposed Action are requested. Written and oral comments may be published in the EIS. Any personal information provided will be used only to identify your desire to make a statement during the public comment portions of the EIS process or to fulfill requests for copies of the EIS or associated documents. Private addresses will be compiled to develop a mailing list for those requesting copies of the Draft or Final EIS. However, only the names of private citizens will appear in the EIS; personal addresses and phone numbers will not be published.

Draft EIS Distribution List

The following agencies and individuals were sent copies of the Draft EIS:

Federal Agency Contacts

Ms. Debbie Faux
Department of Public Works
Residential Communities Initiative
4463 Leonard Wood Ave
Fort Meade, MD 20755

Mr. Chad Jones
Public Affairs Officer (PAO)
Fort Meade
Building 4550, Room 120
Fort Meade, MD 20755-5025

COL Daniel Thomas
Installation Commander
Fort Meade
Building 4551
Fort Meade, MD 20755

Mr. Michael Butler
Chief
Fort Meade DPW-ED
239 Chisholm Avenue
Fort Meade, MD 20255

Mr. Rick Aleshire
Fort Meade Golf Course
Building 6800, Taylor Road
Fort George G. Meade
Fort Meade, MD 20755

Mr. Peter May
Associate Regional Director
National Park Service
Lands and Resources Division
1100 Ohio Dr, SW
Washington, DC 20242

Mr. Stephen Syphax
Chief, Resource Mgmt Division
National Park Service
National Capital Parks East
1900 Anacostia Dr, SE
Washington, DC 20020

Ms. Loretta Sutton
Office of Environmental Policy & Compliance
U.S. Department of the Interior
Main Interior Building (MS 2462)
1849 C Street, NW
Washington, DC 20240

Ms. Dionne Briggs
U.S. Fish and Wildlife Service
12100 Beech Forest Road
Laurel, MD 20708

Ms. Mary Ratnaswamy
U.S. Fish and Wildlife Service
Chesapeake Bay Field Office
177 Admiral Cochrane Dr
Annapolis, MD 21401

Ms. Vaso Karanikolis
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Baltimore, MD 21203-1715

Mr. Mark Wherry
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Annapolis Junct, MD 20701-0508

Mr. Jeff Trulick
CENAB-PL
USACE, Baltimore District
Regulatory Branch
PO Box 1715
Baltimore, MD 21203

Mr. William Arguto
Regional NEPA Coordinator
USEPA, Region 3
1650 Arch St (Mail Code EA30)
Philadelphia, PA 19103-2029

Mr. Brian Higgins, PhD, PE.
Washington Headquarters Services
Department of Defense
1314 Mayflower Drive
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Mr. Daniel Sernovitz
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4418 Llewellyn Avenue
Fort Meade, MD 20755

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1010 Eastway
Glen Burnie, MD 21060

Anne Arundel County Public Library
West County Area Branch
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Odenton, MD 21113

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K. E. Fleischmann
Ellicott City, MD

Ms. Rachel Jacques
Austin, TX

Mr. John Reese
Sandy, UT

Mr. William Trimble
Chicago, IL

Mr. Scott Wolford
Columbia, MD

Mr. John Wolford
New York, NY

Ms. Melissa Boykins
Columbia, MD

Ms. Norine M. Walker
Alexandria, MD

Mr. Jeff Niesz
Arlington, VA

Mr. Josh Gerstein
Arlington, VA

Mr. Jim McElhatton
Washington, DC

Ms. Lisa Decker
Baltimore, MD

Mr. Patrick Walsh
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Ms. Diane Hartley
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Mr. John McElree
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Ms. Nancy Reed
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M. Terry Green
McClellan, VA

Mr. Bob Priest
Gaithersburg, MD

Mr. Harry Sinclair, Jr.
Severn, MD

Mr. John Howley
Silver Spring, MD

Mr. Bert Rice
Odenton, MD

Mr. Eric Stahl
West Chester, PA

The following agencies and individuals were sent notice that the Draft EIS was available for review:

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Annapolis, MD 21401

The Honorable Martin O'Malley
Governor of Maryland
State House
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Annapolis, MD 21401-1925

The Honorable Ken Ulman
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Anne Arundel County
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Draft EIS NOA Distribution Letter (Example)



**NATIONAL SECURITY AGENCY
CENTRAL SECURITY SERVICE**
FORT GEORGE G. MEADE, MARYLAND 20755-6000

June 28, 2010

Mr. William Arguto
Regional NEPA Coordinator
USEPA, Region 3
1650 Arch St (Mail Code EA30)
Philadelphia, PA 191032029

RE: Draft Environmental Impact Statement Addressing Campus Development, Fort George G. Meade, Maryland

Dear Mr. Arguto:

The Department of Defense (DOD) announces the availability of the Draft Environmental Impact Statement (EIS) Addressing Campus Development at Fort George G. Meade, Maryland. The DOD proposes to construct and operate consolidated facilities on a portion of Fort Meade (referred to as "Site M") to meet the National Security Agency's and Intelligence Community's continually evolving requirements. The purpose of the Proposed Action is to provide facilities that are fully supportive of the Intelligence Community's mission. The action is driven by the need to co-locate key partnering organizations to ensure capabilities for current and future missions are achieved. The Draft EIS is being prepared in accordance with the National Environmental Policy Act (NEPA) (42 U.S.C. 4321, et seq.). A Notice of Availability for the Draft EIS was published in the *Federal Register* on June 25, 2010, formally initiating a 45-day public review period.

The DOD invites public and agency input on the Draft EIS. On July 21, 2010, the DOD will hold an open house from 4:30 to 5:00 p.m. and a public meeting from 5:00 to 7:00 p.m. at Fort Meade Middle School, 1103 26th Street, Fort Meade, Maryland 20755. The public meeting may end earlier or later than the stated time depending on the number of persons wishing to speak.

Oral and written comments will be received at the public meeting and considered in preparation of the Final EIS. You can also submit written comments addressed to "Campus Development EIS" c/o HDR|e²M, 2600 Park Tower Dr, Suite 100, Vienna, VA 22180. Written comments are requested by August 16, 2010, to ensure sufficient time to consider public input in preparation of the Final EIS.

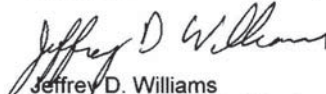
Your comments on the enclosed Draft EIS are requested. Written and oral comments may be published in the EIS. Any personal information provided will be used only to identify your desire to make a statement during the public comment portions of the EIS process or to fulfill requests for copies of the EIS or associated documents. Private addresses will be compiled to develop a mailing list for those requesting copies of the Draft or Final EIS. However, only the names of private citizens will appear in the EIS; personal addresses and phone numbers will not be published.

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Mr. Arguto
June 28, 2010
Page 2 of 2

Your input and comment are greatly appreciated. If you need additional information, please contact me at (301) 688-2970 or send an email to CampusEIS@hdrinc.com for additional information. Thank you for your interest.

Sincerely,


Jeffrey D. Williams
Senior Environmental Engineer

Enclosure: Draft EIS

Draft EIS Public Meeting Transcript

HDR/e²M PUBLIC HEARING
July 21, 2010

Page 1

HDR/e²M
PUBLIC SCOPING MEETING
AND
OPEN HOUSE
CAMPUS DEVELOPMENT PROJECT EIS
FORT MEADE, MARYLAND

JULY 21, 2010

4:30 p.m.

Fort Meade Middle School
1103 26th Street
Fort Meade, Maryland 20755

Reported by: Kathleen Vettters, Notary Public

IRWIN REPORTING & VIDEO, LLC

410-494-1880

A T T E N D E E S

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- Mr. Patrick D. Solomon
Senior NEPA Project Manager

- Mr. Christopher M. Holdridge
Project Manager

- Ms. Lauri R. Watson
HDR/e²M Environmental Professional

- Mr. Robert C. Leib
Special Assistant to County Executive John R. Leopold
Anne Arundel County

1 P R O C E E D I N G S

2 - - - - -

3 MR. SOLOMON: Good evening and welcome to
4 the public meeting for the proposed Campus
5 Development Project for the Department of Defense at
6 Fort Meade, Maryland.

7 My name is Patrick Solomon and I represent
8 HDR/e²M, the contractor preparing the Environmental
9 Impact Statement, or EIS, for this project. Also
10 present from HDR/e²M are Lauri Watson, to my right,
11 and next to her is Chris Holdridge.

12 Before we get started I'd like to cover a
13 few details. I ask that everyone take a moment to
14 silence your pagers and cell phones if you haven't
15 already done so. The fire exits are located down
16 the hallway. The bathrooms are also located across
17 the hallway.

18 If you haven't registered this evening, I
19 encourage you to do so. If you provide your name
20 and address you will be entered in the mailing list
21 and you will be receiving announcements regarding

1 this project.

2 We have a court reporter present and
3 everything that is said tonight will be recorded and
4 kept in the official administrative record for this
5 project.

6 The public meeting will be conducted this
7 evening in two parts. During the first part of the
8 meeting we will present information on the proposed
9 Campus Development Project at Fort Meade, define the
10 Proposed Action and alternatives, and discuss the
11 environmental impact analysis process that will be
12 undertaken.

13 The second part of the meeting is your
14 opportunity to provide comment on the environmental
15 analysis.

16 MS. WATSON: The campus development project
17 was initiated to provide a modern operational complex
18 to meet the growth requirements of NSA and
19 consolidated facilities for Intelligence Community
20 use. Development is proposed for a portion of Fort
21 Meade, referred to as Site M, adjacent to the NSA.

1 The development of Site M is partnered with
2 Fort Meade Comprehensive Expansion Master Plan
3 "inside-out" concept whereby facility assets were
4 anticipated to relocate the internal core of the post
5 as part of the BRAC relocation efforts and for the
6 NSA recapitalization of aging facilities.

7 Site M is divided into northern and
8 southern portions. The northern portion, referred
9 to as Site M, is 137 acres and the southern portion,
10 Site M-2, is 90 acres. DOD proposes that
11 development of Site M occur in three option phases
12 over a horizon of approximately 20 years.

13 DOD considered alternatives for
14 accomplishing this proposed action. The alternatives
15 considered included the No Action Alternative, each
16 of the developmental phases identified above, as well
17 as three options for redundant emergency backup power
18 generation and various pollution control systems.

19 The National Environmental Policy Act, or
20 NEPA, establishes the process that Federal agencies
21 are to follow so that agency officials can make

1 decisions that are based on an understanding of
2 environmental consequences, and take actions that
3 protect, restore, or enhance the environment. The
4 NEPA decision-making process is founded on using
5 accurate scientific analysis, expert agency
6 comments, and public scrutiny to identify the
7 environmental and socioeconomic issues that are
8 truly significant.

9 An EIS has been prepared for the Campus
10 Development Project. An EIS is a public document
11 that describes in detail the Proposed Action, all
12 alternatives that were considered and the
13 environmental impacts of implementing the Proposed
14 Action, reasonable alternatives, and the No Action
15 Alternative. The EIS for the Campus Development
16 Project was prepared consistent with NEPA and the
17 regulations implementing NEPA, as well as DOD's
18 policy for implementing NEPA.

19 MR. HOLDRIDGE: Public involvement is a
20 fundamental aspect of NEPA. Currently, DOD is
21 seeking input from agencies and the public on the

1 Proposed Action, alternatives, and the No Action
2 alternative, as well as the potential environmental
3 impacts.

4 On June 25 and July 2, 2010, a Notice of
5 Availability was published and the Draft EIS was
6 subsequently released for public input.

7 The intent of this public meeting is to
8 receive your comments on the Draft EIS. In addition,
9 written comments on the Draft EIS can be submitted
10 through August 16th. Instructions for filing written
11 comments are available here on the side. Here's the
12 form and you can provide your comments on the back.

13 The Draft EIS describes the nature and
14 extent of the environmental impacts of the Proposed
15 Action. It includes, among other topics, the purpose
16 and need for the Proposed Action, a description of
17 the alternatives, a description of the affected
18 environment, and an evaluation of impacts and
19 cumulative impacts on the natural and human
20 environment by the proposed action and alternatives.

21 Comments received on the Draft EIS will

1 become public record and will be considered in the
2 preparation of the Final EIS. Following publication
3 of the Final EIS there will be another opportunity
4 for you to review the EIS and make comments for
5 consideration in the final decision-making document
6 for this project, which is referred to as the Record
7 of Decision, or the ROD.

8 We are here tonight to listen to your views
9 and concerns regarding environmental issues
10 associated with the Campus Development Project at
11 Fort Meade. Thank you.

12 MR. SOLOMON: My role for this evening is
13 to facilitate the public comment process. The goal
14 is to ensure that every speaker has the opportunity
15 to make comments that they would like to be heard by
16 this group. We are here today in a listening mode.

17 Our primary purpose is to obtain your
18 feedback, questions, and comments on the Draft EIS.
19 We'll be happy to answer any questions on the process
20 at this time. Any questions or comments about the
21 project will be made for the record and considered in

1 the final EIS.

2 If you weren't here for the open house
3 portion earlier this evening, all the public
4 documents are available in the back of the room.
5 Feel free to take copies of the handouts with you.

6 Now for the ground rules: Please begin
7 making your comments by stating your name and any
8 affiliation you have so the court reporter can
9 transcribe it correctly for the record.

10 If you have any written comments in
11 addition to your oral comments, please give those to
12 me and we'll make sure that they are included in the
13 record. Written and oral comments receive the same
14 consideration, so you only need to use one tool in
15 making a comment.

16 Individuals who have signed up to speak
17 will be called in the following order: Elected
18 officials, representatives from public agencies, and
19 then individuals.

20 Everyone who desires to speak needs to sign
21 up on the speaker sheet at the registration table.

1 When you come up to the podium, again, please state
2 your name and affiliation, if any. Each speaker is
3 allotted three minutes to speak. At the end of your
4 three minutes I will signal to you that your time is
5 up. You can finish your sentence and then we will
6 move on to the next speaker.

7 After all the speakers have had one chance
8 to speak, if you would like to speak again you may
9 come back up and finish what you were saying. If you
10 would like to speak but have not yet registered, you
11 can still do so at the registration table.

12 I would now like to open the floor up to
13 any public comments.

14 At this time, nobody has signed up to make
15 any public comments so we will leave the floor open
16 until further notice. Thank you.

17 While we are waiting for anybody who may
18 have the desire to make any oral comment, we will
19 revert back to the open house format so you are
20 welcome to browse, look at the posters, and pick up
21 any handouts and we'll go forth from there. Thank

1 you.

2 (Whereupon, there was a pause in the
3 proceedings.)

4 MR. SOLOMON: We have one person who has
5 signed up to make a oral comment and that is Bob
6 Leib. So, Bob, if you want to come up to the podium
7 and state your name and affiliation for the court
8 reporter.

9 MR. LEIB: For the record, I'm Robert C.
10 Leib, Special Assistant to County Executive John R.
11 Leopold of Anne Arundel County, Special Assistant for
12 BRAC and Education, and I'm also the Coordinator of
13 the Fort George G. Meade Regional Growth Management
14 Committee.

15 My statement for the record is just that
16 Anne Arundel County, on behalf of the County
17 Executive, Anne Arundel County will be making formal
18 comments by the end of the comment period in writing
19 concerning the Campus Development Action of NSA at
20 Fort Meade, and also the Fort George G. Meade
21 Regional Growth Management Committee will also be

1 submitting comments for the record in writing by the
2 end of the comment period. That's all I wanted to
3 say. Thank you.

4 MR. SOLOMON: Thank you. That's all the
5 people we have signed up at this time so we will
6 leave the floor open if anybody else should sign up.
7 In the meantime, we'll go back to the open house
8 format.

9 (Whereupon, there was a pause in the
10 proceedings.)

11 MR. SOLOMON: There are no more public
12 comments. Thank you again for your participation.
13 This meeting is adjourned.

14 (Whereupon, the meeting was adjourned at
15 7:00 p.m.)

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1 I, Kathleen Vettters, a Notary Public of the
2 State of Maryland, County of Baltimore, do hereby
3 certify the within named witness personally appeared
4 before me at the time and place herein set out, and
5 after having been duly sworn by me, according to law,
6 was examined by counsel.

7 I further certify that the examination was
8 recorded verbatim by me and this transcript is a
9 true record of the proceedings.

10 I further certify that I am not of counsel
11 to any of the parties, nor in any way interested in
12 the outcome of this action.

13 As witness my hand and notarial seal this
14 28th day of July, 2010.

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Kathleen Vettters, Court Reporter

NOTARY PUBLIC

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Comments on the Draft EIS and Responses



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

August 16, 2010

Mr. Patrick Solomon
Campus Development EIS
c/o HDR/e²M, Suite 100
2600 Park Tower Drive
Vienna, VA 22180

Re: Draft Environmental Impact Statement Addressing Campus Development at Fort George G. Meade, Maryland (CEQ 20100242)

Dear Mr. Solomon:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1509), the U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Fort George G. Meade Campus Development in Maryland.

The National Security Agency/Central Security Service (NSA/CSS) is a cryptologic intelligence agency administered as part of the Department of Defense (DOD). This agency is responsible for the collection and analysis of foreign communications and foreign signals intelligence. For NSA/CSS to continue to lead the Intelligence Community into the next 50 years with state-of-the-art technologies and productivity, its mission elements will require new facilities and infrastructure.

The purpose of the Proposed Action is to provide facilities that fully support the Intelligence Community's mission. The need for the Proposed Action is to consolidate multiple agencies' efforts to ensure capabilities for current and future mission requirements as directed by Congress and the President.

To meet the NSA's continually evolving requirements, the DOD proposes to develop a portion of Fort Meade (referred to as "Site M" which consists of approximately 227 acres) as an operational complex and to construct and operate consolidated facilities for Intelligence Community use. DOD has considered development of Site M under three discrete phases identified for implementation over a horizon of approximately 20 years. Implementation of Phase I is the Proposed Action. Phases II and III are being analyzed as alternative development options.

The Proposed Action (Phase I) would occur in the near term (approximately 2012 to 2014) on the eastern half of Site M-1, supporting 1.8 million square feet of facilities for a data center and associated administrative space and provide administrative functions for up to 6,500 personnel.

Alternative 1 (Phases I and II) would include implementation of the Proposed Action (Phase I) along with Phase II. Development would occur in the mid-term (2020) on the eastern half of Site M-1, supporting the construction of an additional 1.2 million square feet of administrative facilities including demolition. Phases I and II combined would have a total built space of 3.0 million square feet for 8,000 personnel.

Alternative 2 (Phases I, II, and III) would include the implementation of the Proposed Action (Phase I) along with Phases II and III. This alternative would include the demolition of the golf clubhouse buildings. Under Phase III, development would occur on Site M-2 in the long term (2029) supporting the construction of an additional 2.8 million square feet of operational administrative facilities, for a total built space to 5.8 million square feet for 11,000 personnel under all three phases.

EPA understands the purpose and need for the action proposed for NSA. However, as a result of our review of the DEIS, EPA developed comments and questions (presented in the attached Technical Comments). The three Phases of development appear to be a tiered approach to full build-out as opposed to a comparison of alternatives. Of particular concern is the "Alternatives/Need" for the NSA to fulfill its mission requirements. As presented in the DEIS, the phases of development and/or alternatives stretches over an expanse of land so it is not clear if the Proposed Action meets the mission requirements of NSA and whether the additional phases presented are necessary for meeting the mission requirements. Comments specific to this concern and others pertain to biological resources, vegetation, wetlands and cumulative effects are discussed in the attachment. EPA rated the DEIS an EC-2 (Environmental Concerns/ Insufficient Information), which indicates that we have environmental concerns regarding the proposal and that there is insufficient information in the document to fully assess the environmental impacts of this project. A copy of the EPA's rating system is enclosed for your information.

EPA-1


Thank you for providing EPA with the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,



Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs

Enclosures (4)

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Customer Service Hotline: 1-800-438-2474

EPA-1: Thank you for the comment. Responses to the Technical Comments are provided below.

Technical Comments

Alternatives/Need Analysis

As described in the regulations for the Council on Environmental Quality (CEQ) (40 CFR 1502.14), the examination and comparison of the alternatives under consideration is the heart of the environmental document. It is through this comparison that the lead agency is able to incorporate inter-agency and public input to make informed decisions with regard to the merits of the project and the advantages and disadvantages of each of the alternatives being studied. Consequently, the CEQ regulations require that the details of each alternative, including the “no action” alternative be clearly presented in a comparative form for easy analysis by the reader. The rationale for the selection of the preferred alternative should be clearly stated in the analysis.

As outlined in Section 2.2.2 Development Alternatives Eliminated from Further Detailed Analysis, EPA appreciates and understands NSA’s selection of Site M for campus redevelopment and the limitations associated with redeveloping the existing campus on Fort Meade as well as the desire to remain on Fort Meade as opposed to moving to a new location. However, as presented in the DEIS, the three Phases of development appear to be a tiered approach to full build-out as opposed to a comparison of alternatives. Each of the phases of development (Phase I, II, and III) and alternatives (Proposed Action, Alternative I, and Alternative II) consists of an increase in building footprint, personnel, cost, etc. rather than a comparison of similar alternatives. As a result, the purpose of the DEIS seems to be used to decide on a phased approach to the project as opposed to a presentation of alternatives (e.g., locations) and a complete analysis of the impact of the project.

In addition, as the document reads the “Need” for the action is not clear. What is NSA’s “need” then, the Proposed Action (1.8 million square feet and 6,500 personnel), Alternative I (3.0 million square feet and 8,000 personnel) or Alternative II (5.8 million square feet with the addition of 11,000 personnel)? If the goal is to ultimately build for 5.8 million square feet with an increase in employee personnel of 11,000 then the Alternatives Analysis is inadequate as the three alternatives cannot be compared with each other. An Alternatives Analysis is typically a comparison between designs to meet a stated need. The design (for instance) can vary location, approach (e.g. consolidation vs. dispersing) or footprint. The FEIS should succinctly discuss how the Proposed Action meets the need for the NSA as well as provide a clear basis for choice among options. In addition, if the need is to pursue additional expansion (beyond the Proposed Action) in the future, then this should be explicitly stated in the FEIS with expectation that Phases II and III may need to be evaluated in a separate NEPA evaluation.

EPA-2

Energy Efficiency/Alternative Energy

Section 2.1.2 Operational Complex – Principal Facilities (page 2-3) states, “The facilities would be energy-efficient and use “green” technology, including photovoltaic panels, solar collectors, heat recovery systems, wind turbines, green roofs, and habitat-oriented storm water management, where feasible.” EPA commends the Department of Defense (DOD) and NSA for its intent to incorporate sustainability features into the operational complex; however, the specified energy-efficient technologies would require additional environmental analysis to determine potential impacts, especially with regards to wind turbines. Size, number, location of

EPA-3

EPA-2: Text added to Section 2.1 to clarify that Phase I development meets the immediate need for the Proposed Action. Text added to Section 2.2.1 recognizing that the long-term horizon years for build-out of Phases II and III would necessitate additional National Environmental Policy Act (NEPA) evaluation at that time for expansion beyond the Proposed Action.

EPA-3: Although impacts on wind turbines are discussed in Sections 4.1.3 and 4.3.3, the need for separate evaluation of impacts from wind turbine construction as planning matures is recognized, as stated in Section 4.1.3.

wind turbines and potential environmental impacts would need to be addressed. Thus, the FEIS should state DOD/NSA's intent to prepare a separate environmental evaluation for proposed energy-efficient technologies, such as wind turbines, etc. as the current documentation does not suffice to describe or analyze the impacts associated with these energy alternatives.

EPA-3

This project does present an excellent opportunity to implement the President's Executive Order 13423, Strengthening Federal Environmental Energy and Transportation Management by incorporating energy efficiency into the planning efforts. Enclosed with this letter is information that we recommend the DOD/NSA consider when planning the Proposed Action.

Biological Resources/Vegetation

As noted on page 4-74, the Proposed Action would impact forested areas on the western portion of Site M-1. Site M-1 includes approximately 137 acres of open and wooded land uses. Forest lands located within the entire Site M project area total approximately 104 acres. At this point in the planning process, the actual total acreage of forested lands and vegetation disturbed would depend on the design and layout of the different structures or facilities, the number of buildings required, the size and layout of parking facilities, and the constraints of each of the proposed sites. Because the Campus Development is conceptual and the design plan has not been defined, it is suggested that conservation of the forested area (as feasible) be a factor in the planning/design phase of development. In addition, the FEIS should provide an analysis of forest fragmentation associated with each alternative. The analysis should include potential impacts on species with wide home ranges.

EPA-4

Page 4-75 states, "Large or historic trees (those that are preferred determinant natives, such as oaks and American beech) would be preserved to the greatest extent possible and additional trees planted around them." EPA appreciates the intent to protect large and/or historic trees; however, the FEIS should indicate the size, kind and number of large and/or historic trees to understand the impact and to assess proper mitigation.

EPA-5

Since the Proposed Action would result in a substantial increase in impervious surfaces, as the existing condition of Site M is a golf course with permeable vegetated surfaces throughout with patches of tree cover, it is expected that the kind and quantity of vegetation/trees that will be lost is described in the FEIS. Any effort to add vegetation should be discussed; native species is always recommended.

EPA-6

Wetlands

Page 4-75 states, "Long-term, direct and indirect, adverse impacts are expected as the result of the Proposed Action on the wetland on the eastern portion of Site M-1." The wetland impact should be specified and identified with those already referenced (i.e. Wetland-1, Wetland-2, Wetland-3, Midway Branch) as well as quantified and described. The FEIS should also provide the functional values of all impacted wetlands and develop a mitigation plan for their replacement. It is assumed that only one wetland is impacted by the Proposed Action which should be clearly stated and identified in the FEIS.

EPA-7

EPA-4: Text added to Section 4.7.3 stating that several measures would be incorporated into the design plan to minimize or avoid fragmentation and adverse impacts on species with large home ranges. These measures include preservation of large or historic trees (where feasible) and additional trees planted around them. Also, vegetative buffers at a minimum of 50 feet, with a preferred arrangement of three rows, would be planted in areas along connection corridors and other sensitive areas.

EPA-5: The forest stand delineation did not identify any large historic trees in the assessment plots. The assessment plots do not cover the entire forested area, but characterize representative plots within forest stands. There might be large or historic trees on Site M, but none were identified in the assessment plots. The specific tree species and sizes impacted would depend on the specific design and layout of the different structures or facilities, the number of buildings required, the size and layout of parking facilities, and the constraints of each of the proposed sites, and would be identified as planning progresses.

EPA-6: Section 4.7.3 states, "native shrub and tree species would be planted where possible to provide a higher quality, albeit reduced quantity of, habitat." Text regarding a best management practice (BMP) to this effect has been added to Table ES-5. The kind and quantity of vegetation lost would depend on implementation of the measures identified in the response to Comment EPA-5. Section 4.7.4 discussed additional reforestation strategies; this text has been added to Section 4.7.3.

EPA-7: There would be no direct impacts on the wetlands under the Proposed Action; Section 4.7.3 has been revised to clarify that impacts would only be indirect.

It is noted on page 3-42 that Wetland-2 is a 0.39-acre Palustrine forested habitat. It is important to note that forested wetland systems act as natural filters and sediment traps and absorb flood waters. They provide vital ecological functions that are critical to several wetland dependent animal and plant species. This type of wetland system is vulnerable to a variety of human practices, such as agriculture, urbanization, and forestry. Therefore, wetland impacts from human activities should be avoided to the maximum extent practicable and be properly protected. EPA's mandates include the preservation of these environmentally significant values and functions. Alternatives are available that must be explored as part of the process to avoid these functioning systems.

EPA-8

In addition to the maps (Figure 2.6-1 and Figure 3.7-1) which depict wetlands on Fort Meade, it would be helpful to have depicted on these maps the wetlands identified on page 3-42; specifically, Wetland-1 (a 0.06-acre Palustrine emergent herbaceous habitat), Wetland-2 (a 0.39-acre Palustrine forested habitat), Wetland-3 (a 0.02-acre Palustrine emergent and open water habitat). Also, it would be helpful to indicate on the map the wetland(s) impacted by the Proposed Action as well as other phases.

EPA-9

Soil/Groundwater

As stated on page 3-70, "Soil sampling investigations were conducted as part of a 2004 Environmental Baseline Survey (EBS) of Site M to determine if environmental contamination from pesticide use at the golf courses was present. Sampling results determined that pesticides, including heptachlor epoxide, alpha chlordane, gamma chlordane, and dieldrin, were in excess of MDE soil cleanup standards at several sampling locations with Site M." In addition, the DEIS states, "The sampling investigation did not test for arsenic and lead, which were commonly used as pesticides in the past, and it did not include groundwater sampling." However, the discussion within the Environmental Consequences section, Page 4-94 states that "Minor pesticide contamination was noted within the area of the Proposed Action; however, the level of contamination was reported as not significant enough to impact the future use of Site M and would not require remedial action." It is not clear why the DEIS states that remedial action is not required when it is stated that pesticides were in excess of MDE soil cleanup standards at several sampling locations. Also, it is not understood as to why the sampling investigation did not test for arsenic and lead knowing that they were commonly used as pesticides in the past. The FEIS should also explain why there was no groundwater sampling considering the type of contaminants discussed.

EPA-10

An active IRP Site FGGM 95 is a compilation of 23 nearby landfills. Of the 23 landfills, 8 are within Site M. A number of these sites will require future soil and groundwater monitoring to determine appropriate remedial actions. The DEIS states that prior to the start of construction activities for the Proposed Action, all appropriate remediation measures would be completed at IRP Site FGGM 95. EPA commends DOD/NSA for its intent to cleanup prior to construction of the Proposed Action; however, there is no commitment for cleanup of Phases II and III which would be a vital action for reuse. Without this commitment it seems premature to plan for the proposed site prior to remediation. When design of remedial action is determined, it should be seen if any development plan is consistent with the action.

EPA-11

EPA-8: Construction activities represent potential minor indirect impacts on wetlands that would be minimized or avoided from implementation of BMPs. Impervious surfaces would increase in the immediate area of the development, but efforts would be made to minimize the amount, such as adherence to guidelines as outlined in the State of Maryland storm water regulations, Leadership in Energy and Environmental Design (LEED) Silver requirements, *Fort Meade Integrated Natural Resources Management Plan*, and *Fort Meade Green Building Manual*. There would be no grading or vegetation removal in a nontidal wetland or its 25-foot buffer. Wetland-2 and all other wetlands on Site M would not be directly impacted by the Proposed Action. Floodplains would be avoided and Wetland-2 is entirely within the floodplain for Midway Branch.

EPA-9: Wetlands have been labeled on the inset on Figure 3.7-1.

EPA-10: Text of Section 3.10 revised per the 2004 *Final Environmental Baseline Survey (EBS), Site M, Fort Meade, Maryland*, to indicate that although the soil sampling investigation found levels of pesticide contamination in excess of Maryland Department of the Environment (MDE) residential soil clean-up standards, because Site M is proposed for future use as an administrative complex, no remedial action was determined to be required. The EBS stated but did not identify why groundwater or soil and lead sampling was not conducted.

EPA-11: Remediation of all of Site M is an ongoing program and is independent of the development phases presented in the Environmental Impact Statement (EIS). The site locations for Phases II and III are being remediated simultaneously with the site location of the Proposed Action. Section 4.10 is consistent with this approach.

Transportation

As noted on page 4-40, the funding details are not finalized yet for the road improvements. With a minimum increase of 6,500 employees that would be traveling to and from Fort Meade which would result from the Proposed Action not including the increases of people into the area from other cumulative actions, it would seem necessary to have funding confirmation to ensure the influx of people can be properly managed prior to initiating the Proposed Action.

EPA-12

As noted on page 4-35 under Recommendations, "The results of the study indicate that the influx of new traffic would significantly affect the existing roadway capacity in the vicinity of Fort Meade." This would be a result of the Proposed Action and other projects proposed for the area. Thus, it is recommended that "A region-wide traffic study is suggested to analyze the impacts of future growth in and around Fort Meade and on the regional roadways network in Howard County and Anne Arundel County." EPA defers evaluation of the transportation/traffic impact to the appropriate transportation regulatory agencies; however, it would seem prudent to conduct a region-wide traffic study prior to approval of the Proposed Action to ensure appropriate measures could be implemented to handle the large number of people/vehicles brought into the area as a result of the many actions imposed on the area. In addition, impacts of any transportation improvements should be considered cumulatively with the Fort Meade development.

EPA-13

Environmental Justice

The discussion of Environmental Justice (EJ) does not speak of the impact to minority and low income populations in the area of Fort Meade. Are there classified populations in the immediate vicinity of Fort Meade? If so, describe which communities were identified as EJ concern and how these populations are being involved through outreach in the decision making process. The EJ assessment should assure the protection and appropriate level of consideration for the potential adverse impacts that may have an effect on minority and low income populations living in the area near the site. The FEIS should provide a clear and accurate assessment documenting the identification of areas of potential EJ concern and the potential impacts that may result from the Proposed Action.

EPA-14

Low Impact Development

A Presidential Memorandum (dated April 26, 1994) and Guidance (dated August 10, 1995) applicable to Federal facilities and federally funded projects pertinent to environmentally and economically beneficial landscape practices is to be incorporated into all NEPA-related documents. As outlined in Executive Order 13148 dated April 26, 2000 (Federal Register Vol. 65, No. 81) on Greening the Government, it has been directed that all agencies incorporate the above Guidance into landscape programs, policies and practices. The Guidance calls for agencies that fund and landscape to provide recipients with information of beneficial landscaping as well as to work to support and encourage application of the principles. The EPA, GSA and USDA are tasked with providing technical information on beneficial landscaping to other federal agencies and their facilities. The effort, also recognized as low impact development (LID), has

EPA-12: Comment noted. Pending availability of funding (to the extent then known), transportation mitigation measures will be discussed in the Record of Decision (ROD). In addition, one-third of the 6,500 personnel proposed to consolidate to Site M under the Proposed Action are already on-installation. The remainder would come from locations within the Baltimore and Washington metropolitan areas. The Department of Defense (DOD) is committed to continuing to work with the Maryland Department of Transportation (MDOT), Anne Arundel County, Howard County, Prince George's County, and local stakeholders to conduct further studies to minimize impacts on the transportation network as a result of the Proposed Action and to support transportation improvement projects as appropriate. The June 2010 Interagency Transportation Demand Management (TDM) Memorandum of Understanding (MOU), which identified MDOT as the lead agency for regional transportation improvements as a result of the Base Realignment and Closure (BRAC) process on Fort Meade, demonstrates this commitment. Also see response to Comment AAC-7.

EPA-13: Comment noted. Traffic analysis has focused on NSA needs in relationship to Fort Meade. While a wider study could have been conducted, such is not deemed necessary to the issues at hand. Nonetheless, the DOD is willing to contribute to development of a regional transportation study with state and local agencies.

EPA-14: Text clarified in Section 4.11 to state that there are no minority or low-income populations in the vicinity of the Proposed Action that would be disproportionately affected.

the potential to reduce impacts on watershed hydrology and aquatic resources. This is described in the enclosure provided.

Cumulative Impacts

The cumulative impacts from the loss of open space and conversion of forested land will be significant. The Proposed Action would result in the loss of 82 acres of open space, the utilities upgrades would result in the loss of 6 acres of open space, the BGE Substation could result in the loss of as much as 83 acres, the BRAC actions would result in the loss of 175 acres of open space, the EUL action would result in the loss of 540 acres. Cumulatively, the loss of open space could be as much as 886 acres or 32 percent of open space on Fort Meade. (This does not include Phase II and Phase III.)

In addition, the cumulative impact from the addition of people into the area is extensive. The Proposed Action would add 6,500 employees to the area. BRAC actions would add 5,700 people to Fort Meade. The EUL project will result in the addition of 10,000 people.

As a result of the loss of open space and forested areas, the large number of people that would be coming into the area and the impact on the road systems, the combined cumulative impacts is adverse.

Although the DEIS does a good job in identifying the resource-specific cumulative impacts, it seems as if multiple resources will be impacted from multiple projects. Since the projects identified are not yet complete, there is a concern that approval and implementation of these projects could result in significant impacts. It would seem prudent to evaluate the environmental impacts that would result from each project and reevaluate the options upon completion. Thus, it does not seem feasible to use the existing environmental evaluation to suffice for Phase II and Phase III. As projects are complete, more accurate data assessment would lend itself to the feasibility of pursuing future projects.

EPA-15

EPA-15: The DOD agrees that future NEPA evaluation will provide a better perspective on potential direct and cumulative effects. Planning for Phases II and III would be more mature at that time, and impacts can be better assessed upon the future baseline conditions at that time.

**SUMMARY OF RATING DEFINITIONS
AND FOLLOW UP ACTION***

Environmental Impact of the Action

LO--Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC--Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO--Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU--Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1--Adequate

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information

The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment

ENERGY EFFICIENCY

General

The Federal government has made significant progress in improving environmental and energy performance through a series of executive orders, Memoranda of Understanding, and other guidance. Executive Order (EO) 13423: Strengthening Federal Environmental, Energy, and Transportation Management, intends to build on that body of work and success by integrating and updating prior practices and requirements into a cohesive, strategic approach to further ensure enhanced performance and compliance with statutory and other legal requirements. Section 2 of the EO directs Federal agencies to implement sustainable practices for:

- Energy efficiency and reductions in greenhouse gas emissions.
- Use of renewable energy.
- Reduction in water consumption intensity.
- Acquisition of green products and services.
- Pollution prevention, including reduction or elimination of the use of toxic and hazardous chemicals and materials.
- Cost-effective waste prevention and recycling programs.
- Increased diversion of solid waste.
- Sustainable design/high performance buildings.
- Vehicle fleet management, including the use of alternative fuel vehicles and alternative fuels and the further reduction of petroleum consumption.
- Electronics stewardship.

Each agency shall use a variety of energy and water management strategies and tools to meet the goals of EO 13423. These strategies and tools include, but are not limited to, the following:

Distributed Generation

Where life-cycle cost effective, each agency shall implement distributed generation systems in new construction or retrofit projects, including renewable systems such as solar electric, solar lighting, geo (or ground-coupled) thermal, small wind turbines, as well as other generation systems such as fuel cell, cogeneration, or highly efficient alternatives. In addition, agencies are encouraged to use distributed generation systems when a substantial contribution is made toward enhancing energy reliability or security.

Energy Purchasing

Agencies should purchase electricity and thermal energy from sources that use high efficiency and low-carbon generating technologies in order to reduce greenhouse gas intensity to the extent possible.

Water Efficient Products

Where applicable, agencies should purchase WaterSense (SM) labeled products and choose irrigation contractors who are certified through a WaterSense labeled program. EPA's



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WaterSense program is a voluntary public-private partnership that identifies and promotes high performance products and programs that help preserve the nation's water supply.

Procurement

Each agency shall give preference in their procurement and acquisition programs to the purchase of:

- Recycled content products designated in EPA's Comprehensive Procurement Guidelines.
- Energy Star® products identified by DOE and EPA, as well as Federal Energy Management Program (FEMP) designated energy-efficient products.
- Water-efficient products, including those meeting EPA's WaterSense standards.
- Energy from renewable sources.
- Biobased products designated by the U.S. Department of Agriculture in the BioPreferred Program.
- Environmentally preferable products and services, including Electronic Product Environmental Assessment Tool (EPEAT) registered electronic products.
- Alternative fuel vehicles and alternative fuels required by Energy Policy Act (EPAct).
- Products with low or no toxic or hazardous constituents, consistent with Section 7(a) of the EO.
- Non-ozone depleting substances, as identified in EPA's Significant New Alternatives Program.

Energy Efficient Standby Power Devices

When purchasing commercially available, off-the-shelf energy-consuming products, agencies shall purchase products that use no more than one watt of standby power as defined and measured by International Electrotechnical Commission (IEC) code 62301, or otherwise meet FEMP specifications for low standby power consumption. If FEMP has not specified a standby power level for a product category, agencies shall purchase products with the lowest standby power consumption available. Agencies shall adhere to these requirements, when life-cycle cost effective and practicable, and where the relevant product's utility and performance are not compromised as a result.

For projects involving new equipment for office personnel: For further Pollution Prevention efforts, agencies can take the Federal Electronics challenge by buying green computers that have monitors that automatically shut-off when not in use. Donating or reusing surplus computers conserves energy by decreasing the demand from energy-intensive manufacturing processes. While the environmental impact of each computer may be small, when they are added up across the entire federal government the impact is great.

For highway/transportation projects: If lighting is necessary, we recommend agencies consider using energy-efficient, low-impact lighting.



Facilities/Green Buildings

Metering

To the maximum extent practicable, agencies should install metering devices that measure consumption of potable water, electricity, and thermal energy in Federal buildings and other facilities and grounds. Data collected shall be incorporated into Federal tracking systems and be made available to Federal facility managers. Agencies should consider inclusion of metering requirements in all Energy Savings Performance Contracts (ESPC) and Utility Energy Services Contracts (UESC), as appropriate.

Auditing

Agencies should conduct energy and water audits of at least 10 percent of facility square footage annually and conduct new audits at least every 10 years, thereafter. This audit requirement can be met by audits done in conjunction with ESPC or UESC projects.

Energy Star® Tools

For applicable facilities, agencies should meet Energy Star® Building criteria, and score the energy performance of buildings using the Energy Star® Portfolio Manager rating tool as part of comprehensive facility audits. Agencies may use the Energy Star Portfolio Manager rating tool to track energy and water use in all facilities.

A variety of energy efficient lighting products, appliances, fans, heating and cooling equipment that have received the Energy Star label are now commercially available. These products can provide lower utility bills and help reduce green house gas emissions. More information about Energy Star products and locations where they can be purchased can be found at:
www.energystar.gov.

Recycling Programs

Each agency shall maintain waste prevention and recycling programs in all of its facilities in the most cost-effective manner possible, and where appropriate, leased facilities and facilities managed by the General Services Administration (GSA). In GSA managed facilities, GSA shall manage the recycling program, but agencies shall work with GSA to ensure that there is a recycling program that meets the agencies' needs.

Leadership in Energy and Environmental Design (LEED)

The United States Green Building Council is the nation's foremost coalition of leaders from across the building industry working to promote buildings that are environmentally responsible, profitable and healthy places to live and work. The Leadership in Energy and Environmental Design (LEED) Green Building Rating System, is the nationally accepted standard for green buildings developed by the United States Green Building Council. Agencies should utilize the LEED standard for green building and aim for LEED certification. More information about the LEED Green Building Rating System is available at <http://www.usgbc.org>.



Environmental Management System

An Environmental Management System (EMS) is a set of processes and practices that enable an organization to reduce its environmental impacts, reduce costs, and increase its operating efficiency. An EMS is a management framework that provides a routine annual process for assessing environmental impacts and implementing continuous improvement measures to its environmental policy. It is a continual cycle of planning, implementing, reviewing and improving the processes and actions that an organization undertakes to meet its business and environmental goals. Most EMSs are built on the "Plan, Do, Check, Act" model. Through a certified EMS, agencies can demonstrate a commitment to being environmentally sound, in the planning, construction, monitoring and follow-up actions related to its operations. In addition, the value of having a certified EMS, provides for a third party check and monitor system to ensure that contractors are in fact following through with environmental commitments. Commitment to implement an EMS serves as effective mitigation for impacts resulting from project development. More information about EMS is available at <http://www.epa.gov/ems>.

Sustainability

Building construction and operation have an enormous direct and indirect impact on the environment. Buildings not only use resources such as energy and raw materials, they also generate waste and potentially harmful atmospheric emissions. As economy and population continue to expand, designers and builders face a unique challenge to meet demands for new and renovated facilities that are [accessible](#), [secure](#), [healthy](#), and [productive](#) while minimizing their impact on the environment.

The main objectives of sustainable design are to avoid resource depletion of energy, water, and raw materials; prevent environmental degradation caused by facilities and infrastructure throughout their life cycle; and create built environments that are livable, [comfortable](#), [safe](#), and [productive](#).

While the definition of what constitutes sustainable *building* design is constantly changing, there are six fundamental principles generally agreed on.

Optimize Site Potential

Creating sustainable buildings starts with proper site selection, including consideration of the reuse or rehabilitation of existing buildings. The location, orientation, and landscaping of a building affect the local ecosystems, transportation methods, and energy use. Siting for physical security has become a critical issue in optimizing site design. The location of access roads, parking, vehicle barriers, and perimeter lighting must be integrated into the design along with sustainable site considerations. Site design for security cannot be an afterthought. Along with site design for sustainability, it must be addressed in the preliminary design phase to achieve a successful project. See WBDG [Balancing Security/Safety and Sustainability Objectives](#).

Optimize Energy Use

With America's supply of fossil fuel dwindling, concerns for energy security increasing, and the impact of greenhouse gases on world climate rising, it is essential to find ways to



reduce load, increase efficiency, and utilize renewable energy resources in federal facilities.

Protect and Conserve Water

In many parts of the country, fresh water is an increasingly scarce resource. A sustainable building should reduce, control, or treat site-runoff, use water efficiently, and reuse or recycle water for on-site use when feasible.

Use Environmentally Preferable Products

A sustainable building should be constructed of materials that minimize life-cycle environmental impacts such as global warming, resource depletion, and human toxicity. These environmentally preferable materials are defined by Executive Order 13101 to be "products or services that have a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose." As such, they contribute to improved worker safety and health, reduced liabilities, reduced disposal costs, and achievement of environmental goals.

Enhance Indoor Environmental Quality (IEQ)

The indoor environmental quality (IEQ) of a building has a significant impact on occupant health, comfort, and productivity. Among other attributes, a sustainable building should maximize daylighting; have appropriate ventilation and moisture control; and avoid the use of materials with high-VOC emissions. Additional consideration must now be given to ventilation and filtration to mitigate chemical, biological, and radiological attack.

Optimize Operational and Maintenance Practices

Incorporate operating and maintenance considerations into the design of a facility will greatly contribute to improved working environments, higher productivity, and reduced energy and resource costs. Designers are encouraged to specify materials and systems that simplify and reduce maintenance requirements; require less water, energy, and toxic chemicals and cleaners to maintain; and are cost-effective and reduce life-cycle costs.

For projects involving new buildings:

- We encourage an analysis of available conservation methods such as using recycled materials, green roofs, passive solar heating, natural lighting for offices, energy efficient lighting, timers for light fixtures and water faucets, etc. The implementation of such concerns may reduce energy consumption and greenhouse gas emissions.
- The energy impacts would also be minimized by choosing an alternative which maximizes accessibility to mass transit.
- We encourage the use of recycled industrial materials. These materials conserve energy and reduce greenhouse gas emissions by decreasing the demand for products made from energy-intensive manufacturing processes. You can learn more about these materials at the following websites: www.acma-usa.org, www.epa.gov/epaoswer/osw/conservation/bene-use.htm, www.cdrecycling.org, http://greenbuildings.berkeley.edu/pro_wurster.htm, and www.foamdrrecycling.org.



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We realize that all of the recommendations listed above may not be applicable to this specific project, but please consider these issues as you proceed through project design



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Low Impact Development

It is important to incorporate LID efforts to mitigate the effects of development through traditional stormwater management practices which have proven to not be entirely successful. Traditional collection and conveyance systems, stormwater ponds and other stormwater facilities do not replicate natural systems, which greatly slow water before it reaches streams, wetlands and other waters. Development often times results in the loss of trees and other vegetation, the compaction of soils by heavy equipment, and the creation of vast stretches of connected impervious areas. These combined factors are extremely difficult to compensate for using traditional practices. As a result, the following site design (goals) and planning practices can be used to minimize stormwater impacts.

Goal: Minimize direct stormwater impacts to streams and wetlands to the maximum extent practicable.

Practices:

1. Locate stormwater facilities outside of streams and wetlands;
2. maintain natural drainage routes on site;
3. preserve riparian buffers; and
4. distribute "Integrated Management Practices" (IMP) used in lieu of centralized ponds.

Goal: Preserve the natural cover on as much of the site as possible, especially for areas located on hydrologic soil groups (HSG) A and B.

Practices:

1. Utilize clustered development designs and preserve a significant portion of the site in a natural state;
2. utilize "fingerprint" clearing by limiting the clearing and grading of forests and native vegetation to the minimum area needed for the construction of the lots, the provision of necessary access, and fire protection;
3. avoid impacts to wetlands to vegetated riparian buffers; and
4. preserve A and B Soils in natural cover.

Goal: Minimize the overall impervious cover.

Practices:

1. Utilize the minimum required width for streets and roads;
2. utilize street layouts that reduce the number of homes per unit length;
3. minimize cul-de-sac diameters, use doughnut cul-de-sacs, or use alternative turnarounds;
4. minimize excess parking space construction, utilize pervious pavers in low-use parking areas;
5. utilize structured or shared parking;
6. reduce home setbacks and frontages;

7. where permitted, minimize sidewalk construction by utilizing sidewalks on one side only, utilizing "Skinny" sidewalks, or substituting sidewalks with pervious trails through common greenspace;
8. substitute pervious surfaces for impervious wherever possible;
9. where permitted, avoid the use of curb and gutter and utilize vegetated open swales, preferably "engineered swales" with a permeable soil base; and
10. minimize compaction of the landscape and in areas where soils will be "disked" prior to seeding, and amended with loam or sand to increase absorption capacity.

Goal: Locate infiltration practices on HSG A and B soils wherever possible. Thus, every effort should be made to utilize areas with these soils for IMP that promote infiltration.

Goal: Locate impervious areas on less permeable soils (HSG C and D). Placement of impervious areas on lower permeability soils minimizes the potential loss of infiltration/recharge capacity on the site.

Goal: "Disconnect" impervious areas. "Disconnecting" means having impervious cover drain to pervious cover (i.e. downspouts draining to the yard, not the driveway). This decreases both the runoff volume and Time of Concentration.

Goal: Increase the travel time of water off of the site (Time of Concentration).

Practices:

1. Flatten grades for stormwater conveyance to the minimum sufficient to allow positive drainage;
2. increase the travel time in vegetated swales by using more circuitous flow routes, rougher vegetation in swales, and check dams; and
3. utilize "engineered" swales in lieu of pipes or hardened channels.

Goal: Utilize soil management/enhancement techniques to increase soil absorption.

Practices:

1. Delineate soils on site for the preservation of infiltration capacity; and
2. require compacted soils in areas receiving sheetflow runoff (such as yards, downslope of downspouts).

Goal: Revegetate all cleared and graded areas.

Goal: Use "engineered swales" for conveyance in lieu of curb and gutter wherever possible.

Goal: Utilize level spreading of flow into natural open space.

For additional LID information, please refer to the following web sites.

LID Manuals:

- http://www.epa.gov/owow/nps/lid_hydr.pdf
- <http://www.epa.gov/owow/nps/lid/lidnat1.pdf>
- <http://www.bmpdatabase.org>
- <http://www.epa.gov/ednmml/>
- Combined Sewer Overflows Guidance for Monitoring and Modeling Document
Type, Published: 1/1/99 <http://www.epa.gov/npdes/pubs/chap05-sco.pdf>



TO WHOM IT MAY CONCERN:

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904



DOI-1: Comment noted. Thank you for your support.

August 10, 2010

9043.1
ER 10/606

Campus Development EIS
c/o HDR|e²M
2751 Prosperity Avenue, Suite 200,
Fairfax, VA 2203

Dear Sir/Madam:

The U. S. Department of the Interior (Department) has no comment on the Draft Environmental Impact Statement addressing campus development at Fort George G. Meade, Maryland.] DOI-1

Thank you for the opportunity for comment.

Sincerely,

Michael T. Chezik
Regional Environmental Officer



Martin O'Malley
Governor
Anthony G. Brown
Lt. Governor

Richard Elerkoff Hall
Secretary
Matthew J. Piarr
Deputy Secretary

August 15, 2010

Mr. Jeffrey Williams
Senior Environmental Engineer, Environment and Safety Services
National Security Agency
9800 Savage Road, Suite 6404
Fort George Meade, MD 20755-6404

STATE CLEARINGHOUSE RECOMMENDATION

State Application Identifier: MD20100706-0666
Applicant: National Security Agency (NSA) and Central Security Service
Project Description: Draft EIS: addressing campus development at Fort George Meade to meet needs of the intelligence community (see MD20090717-1052)
Project Location: Anne Arundel County
Approving Authority: U.S. Department of Defense
Recommendation: Consistent with Qualifying Comments and Contingent Upon Certain Actions

Dear Mr. Williams:

In accordance with Presidential Executive Order 12372 and (Code of Maryland Regulation 34.02.01.04-.06), the State Clearinghouse has coordinated the intergovernmental review of the referenced project. This letter, with attachments, constitutes the State process review and recommendation based upon comments received to date. This recommendation is valid for a period of three years from the date of this letter.

Review comments were requested from the Maryland Departments of Business and Economic Development, the Environment, Transportation, Natural Resources, Agriculture, the Maryland Military Department, Anne Arundel and Howard Counties, the Baltimore Metropolitan Council, and the Maryland Department of Planning, including the Maryland Historical Trust. As of this date, the Maryland Departments of Natural Resources, Transportation, Business and Economic Development have not submitted comments. **This recommendation is contingent upon the Applicant considering and addressing any problems or conditions that may be identified by their review. Any comments received will be forwarded.**

Anne Arundel County and the Maryland Historical Trust stated that their findings of consistency are contingent upon the Applicant taking the actions summarized below. Anne Arundel County addressed these issues: ways to mitigate the anticipated impacts of additional traffic generated by the proposed actions; the demographics of the employment estimate for the proposal to facilitate travel demand and air quality modeling; an analysis of the impact associated with employment shift and household creation; status of the proposed privatization of the potable water and sewer service to the Garrison; changes in the allowed discharge limits to accommodate improvement to the Garrison's wastewater treatment system; improvement to the water quality in the Midway Branch subwatershed; identification of methods to reduce emergency response time; and the development of an intergovernmental, and public consultation procedure. The Anne Arundel Office of Planning and Zoning had no objection to the proposed development, finding this request to be consistent with the goal for growth contained in the Odenton Small Area Plan. See the attached letter.

MD-1

301 West Preston Street • Suite 1101 • Baltimore, Maryland 21201-2205
Telephone: 410.767.4500 • Fax: 410.767.4430 • Toll Free: 1.877.767.6272 • TTY Users: Maryland Relay
Internet: Planning.Maryland.gov

MD-1: Comment noted. Comments on the Draft EIS from Anne Arundel County and responses to those comments marked as AAC are provided in a separate letter in this EIS Appendix C. Scoping comments from Anne Arundel County are provided in Appendix B.

Mr. Jeffrey Williams
 August 15, 2010
 Page 2

The Maryland Historical Trust (the Trust) determined that it has been trying since August of 2009 to get NSA to provide adequate information that would allow the Trust to conduct its historic preservation review. There are a variety of historic properties that may be impacted by the proposed project, including a 19th century cemetery. The Trust's findings of consistency are contingent upon the:

1. NSA providing the Trust with the documentation that is needed to continue its review, and
2. NSA continuing to consult with the Trust, and fulfilling all historic preservation requirements in accordance with Section 106 of the National Historic Preservation Act.

MD-2

The Maryland Department of the Environment (MDE) found this project to be generally consistent with their plans, programs, and objectives, but included these qualifying comments.

1. If a project receives Federal funding, approvals and/or permits, and will be located in a nonattainment area or maintenance area for ozone, carbon monoxide, or fine particulate matter (pm 2.5), the applicant should determine whether emissions from the project will exceed the thresholds identified in the Federal rule on general conformity. If the project emissions will be greater than these thresholds, contact the Planning Division of the Air Quality Planning, Air and Radiation Management Administration, at (410) 537-3240 for further information regarding threshold limits.

MD-3

2. Any above-ground or underground petroleum storage tanks that may be utilized must be installed and maintained in accordance with applicable State and Federal laws and regulations. Contact the Oil Control Program at (410) 537-3442 for additional information.

3. Underground storage tanks must be registered and the installation must be conducted and performed by a contractor certified to install underground storage tanks by the Waste Management Administration in accordance with (COMAR) 26.10. Contact the Oil Control Program at (410) 537-3442 for additional information.

4. Any solid waste including construction, demolition and land clearing debris, generated from the subject project, must be properly disposed of at a permitted solid waste acceptance facility, or recycled if possible. Contact the Solid Waste Program at (410) 537-3318 for additional information.

MD-4

5. The Hazardous Waste Program should be contacted directly at (410) 537-3343 by those facilities which generate or propose to generate or handle hazardous wastes to ensure these activities are being conducted in compliance with applicable State and Federal laws and regulations.

6. The Hazardous Waste Program should be contacted at (410) 537-3343 prior to construction activities to ensure that the treatment, storage or disposal of hazardous wastes and low-level radioactive wastes at the facility will be conducted in compliance with applicable State and Federal laws and regulations.

7. Any contract specifying "lead paint abatement" must comply with Code of Maryland Regulations (COMAR) 26.16.01 – Accreditation and Training for Lead Paint Abatement Services. If a property was built before 1950 and will be used as rental housing, then compliance with (COMAR) 26.16.02 – Reduction of Lead Risk in Housing; and Environment Article Title 6, Subtitle 8, is required. Additional guidance regarding projects where lead paint may be encountered can be obtained by contacting the Environmental Lead Division at (410) 537-3825.

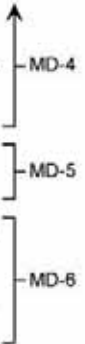
MD-2: NSA will continue to consult with the Trust regarding the Section 106 process as planning progresses and becomes more refined. A report detailing the ground penetrating radar (GPR) survey for two undocumented cemeteries on Site M in which the potential cemetery locations were not confirmed and a historic resource report evaluating the golf course that recommended the resource as not eligible for listing in the National Register of Historic Places were provided to the Trust. At this time, due to the uncertainty of the findings regarding the undocumented cemeteries, the last known locations of the cemeteries would be presented to the site design team as areas of nondisturbance. In addition, if site surveys and excavation activities locate a potential cemetery elsewhere on the Phase I project site, work would immediately cease in the vicinity and the Trust would be notified. If detailed site planning for Phases II and III determines that there might be impacts on the existing documented Downs Cemetery and associated farmhouse site or the Sergeant Major's house site, appropriate archaeological surveys would commence and consultation with the Trust would occur.

MD-3: Comment noted. It is not anticipated that the Proposed Action would exceed criteria pollutant thresholds, as stated in Section 4.4.

MD-4: Comment noted. Thank you for your support. Section 4.10 of the EIS discusses management of hazardous materials and waste, and coordination with MDE on these issues would occur as appropriate as planning progresses.

Mr. Jeffrey Williams
August 15, 2010
Page 3

8. The proposed project involves rehabilitation, redevelopment, revitalization, or property acquisition of commercial, industrial property. Accordingly, MDE's Brownfields Site Assessment and Voluntary Cleanup Programs (VCP) may provide valuable assistance to you in this project. These programs involve environmental site assessment in accordance with accepted industry and financial institution standards for property transfer. For specific information about these programs and eligibility, please contact James Carroll, Program Administrator, Land Restoration Program at (410) 537-3437.



The Maryland Department of the Environment also submitted qualifying comments concerning: water quality impairments; total maximum daily loads; and anti-degradation of water quality. See the attached memorandum, and a map.

The Maryland Department of Agriculture; the Maryland Military Department; the Baltimore Metropolitan Council, Howard County; and the Maryland Department of Planning found this project to be consistent with their plans, programs, and objectives. The Maryland Department of Agriculture stated that there are no Maryland Agricultural Land Preservation Foundation easements in the general vicinity of the Garrison. See the attached letter.

The Baltimore Metropolitan Council commented that the Draft EIS addressing campus development at Fort Meade has been reviewed, and is consistent with the adopted Regional Transportation Plan.

Any statement of consideration given to the comments should be submitted to the approving authority, with a copy to the State Clearinghouse. The State Application Identifier Number must be placed on any correspondence pertaining to this project. The State Clearinghouse must be kept informed if the approving authority cannot accommodate the recommendation.

Please remember, you must comply with all applicable state and local laws and regulations. If you need assistance or have questions, contact the State Clearinghouse staff person noted above at 410-767-4490 or through e-mail at brosenbush@mdp.state.md.us. Also please complete the attached form and return it to the State Clearinghouse as soon as the status of the project is known. Any substitutions of this form must include the State Application Identifier Number. This will ensure that our files are complete.

Thank you for your cooperation with the MIRC process.

Sincerely,

Linda C. Janey, J.D., Assistant Secretary
for Clearinghouse and Communications

LCJ:BR

lindj@arec

cc: Beth Cole - SBIF
Timothy Edwards - DBED
Joane Mueller - MDE
Cindy Johnson - MDOT
Richard Lingers - DNR

Gloria Chambers - MDA
Lawrence Lease - MBLT
Susan Overstreet - HOWD
John Douth - ANARP

May Logan - BMC

#B666_CRR_CLEA

MD-5: Comment noted. Thank you for your support. Section 3.6.2 discusses water quality impairment of Midway Branch and Little Patuxent River, Total Maximum Daily Loads, and Tier II waters. Section 4.6.3 discusses potential impacts on Tier II waters.

MD-6: Comment noted. Thank you for your support.

Fort Meade Draft EIS Campus Development

Maryland Department of the Environment - Science Services Administration

REVIEW FINDING: R1 Consistent with Qualifying Comments
(MD2010 0706-0666)

The following additional comments are intended to alert interested parties to issues regarding water quality standards. The comments address:

A. Water Quality Impairments: Section 303(d) of the federal Clean Water Act requires the State to identify impaired waters and establish Total Maximum Daily Loads (TMDLs) for the substances causing the impairments. A TMDL is the maximum amount of a substance that can be assimilated by a waterbody such that it still meets water quality standards.

Planners should be aware of existing water quality impairments identified on Maryland's 303(d) list. The Project is situated in the Little Patuxent River watershed, identified by the MD 8-digit code 02131105, which is currently impaired by several substances and subject to regulations regarding the Clean Water Act.

Planners may find a list of nearby impaired waters by entering the 8-digit basin code into an on-line database linked to the following URL:
http://www.mde.state.md.us/Programs/WaterPrograms/TMDL/Maryland%20303%20dlist/2008_303d_search/index.asp

This list is updated every even calendar year. Planners should review this list periodically to help ensure that local decisions consider water quality protection and restoration needs. **Briefly, the current impairments that are relevant to the Project include the following:**

Little Patuxent River (02131105)

Nutrients: Non-tidal. A TMDL is pending development.
Sediments: Non-tidal. A TMDL is pending development.
Biological: Non-tidal. A TMDL is pending development.

B. TMDLs: Development and implementation of the Plan should take into account consistency with TMDLs developed for the impaired waterbodies referenced above. Decisions made prior to the development of a TMDL should strive to ensure no net increase of impairing substances. TMDLs are made available on an updated basis at the following web site:

www.mde.state.md.us/Programs/WaterPrograms/TMDL/Summittals/index.asp

MD 2010 0706-0666

Special protections for high-quality waters in the local vicinity, which are identified pursuant to Maryland's anti-degradation policy;

C. Anti-degradation of Water Quality: Maryland requires special protections for waters of very high quality (Tier II waters). The policies and procedures that govern these special waters are commonly called "anti-degradation policies." This policy states that "proposed amendments to county plans or discharge permits for discharge to Tier II waters that will result in a new, or an increased, permitted annual discharge of pollutants and a potential impact to water quality, shall evaluate alternatives to eliminate or reduce discharges or impacts." These permitted annual discharges are not just traditional Point Sources, it can include all discharges such as Stormwater.

Currently, Tier II waters are not present in the area surrounding the project.

Planners should be aware of legal obligations related to Tier II waters described in the Code of Maryland Regulations (COMAR) 26.08.02.04 with respect to current and future land use plans. Information on Tier II waters can be obtained online at: <http://www.dsd.state.md.us/comar/getfile.aspx?file=26.08.02.04.htm> and policy implementation procedures are located at <http://www.dsd.state.md.us/comar/getfile.aspx?file=26.08.02.04-1.htm>

Planners should also note that since the Code of Maryland Regulations is subject to periodic updates. A list of Tier II waters pending Departmental listing in COMAR can be found, with a discussion and maps for each county, at the following website: <http://www.mde.state.md.us/ResearchCenter/Data/waterQualityStandards/Antidegradation/index.asp>

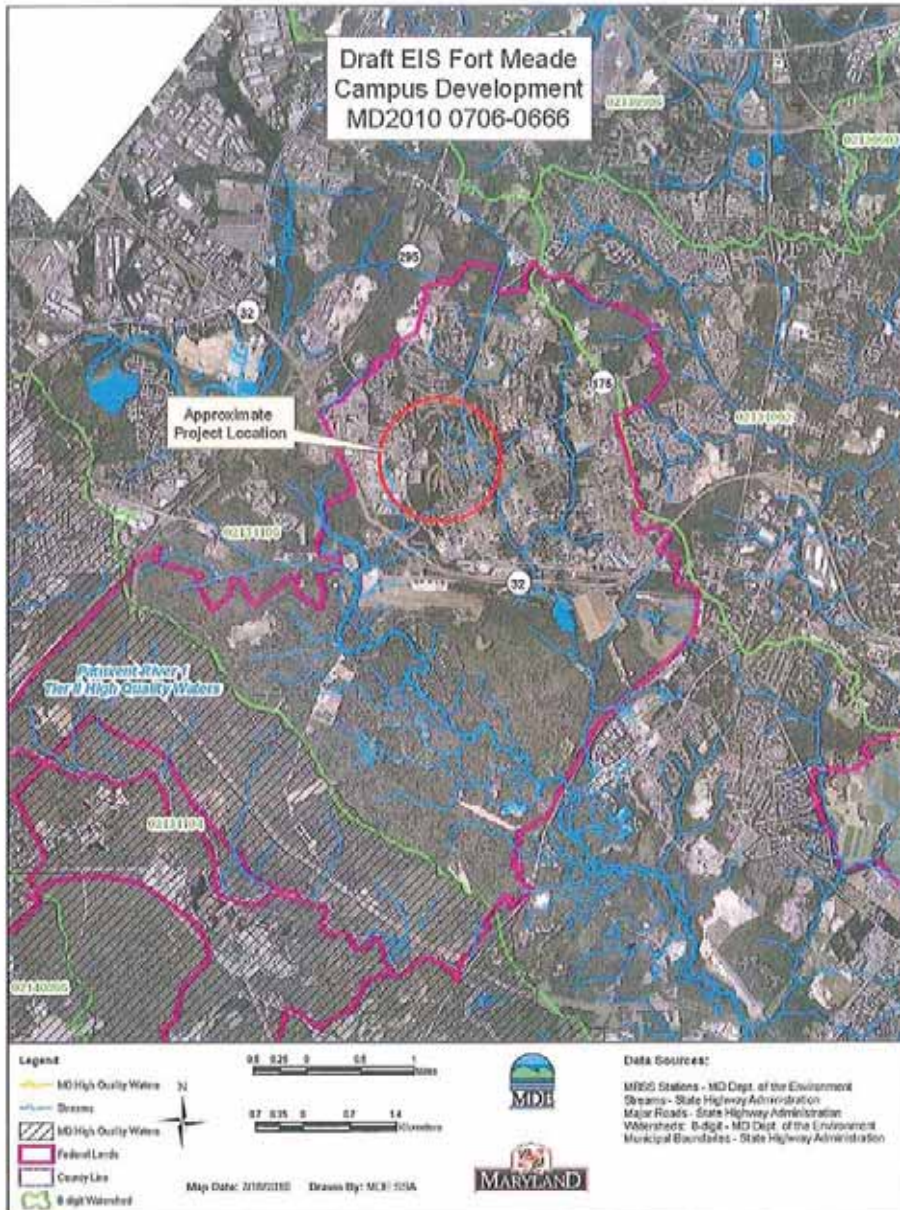
ADDITIONAL COMMENTS

The project should consider all Maryland Stormwater Management Controls. Site Designs should consider all Environmental Site Design to the Maximum Extent Practicable and "Green Building" Alternatives. Designs that reduce impervious surface and BMPs that increase runoff infiltration are highly encouraged.

Further Information:
<http://www.mde.state.md.us/Programs/WaterPrograms/SedimentandStormwater/swm2007.asp>

Environmental Site Design (Chapter 5):
<http://www.mde.state.md.us/assets/document/Design%20Manual%20Chapter%205%2003%2024%202009.pdf>

Redevelopment Regulations:
<http://www.dsd.state.md.us/comar/comarhtml/26/26.17.02.05.htm>





Maryland
Department of Agriculture

Agriculture | Maryland's Leading Industry

Office of the Secretary

Martin O'Malley, Governor
Anthony G. Brown, Lt. Governor
Earl F. Hance, Secretary
Mary Ellen Setting, Deputy Secretary

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Annapolis, Maryland 21401
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301.261.8106 Washington, D.C.
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MARYLAND AGRICULTURAL LAND PRESERVATION FOUNDATION

July 7, 2010

MEMORANDUM

TO: Bob Rosenbush, Planner, MDP
FROM: Carol S. West, Administrator *CSW*
RE: State Application Identifier: MD20100706-0666

The Maryland Agricultural Land Preservation Foundation has no comments for the project titled "Draft EIS: addressing campus development at Fort George Meade to meet needs of the intelligence community" in Anne Arundel County. There are no MALPF easements in this general vicinity. The project appears to be consistent with our programs objectives.



County Executive John R. Leopold
P.O. Box 2700, Annapolis, MD 21404

August 11, 2010

Jeffrey Williams
Environmental and Safety Services
Department of Defense
9800 Savage Road, Suite 6404
Fort George G. Meade, Maryland 20755-6404

Dear Mr. Williams:

Thank you for providing Anne Arundel County, Maryland with the opportunity to offer comments regarding the DRAFT *Environmental Impact Statement, Addressing Campus Development at Fort George G. Meade, Maryland* (July 2010). We understand the significance of this effort to relocate existing assets of the National Security Agency (NSA) to a more modern and secure facility as well as the need to increase the number of personnel to meet and overcome the cyber and signal intelligence threats to the United States.

While we understand and support the purpose and need for this Federal Action, Anne Arundel County is concerned about the extent of impacts that will likely be generated by that action on the area's water and other natural resources, surface transportation network, housing inventory, and other socio-economic impacts. In general, the review by the County's staff finds that the document generally identifies those impacts.

It is also our understanding, based on the scoping meeting and the description provided in the July 2, 2009 Federal Register/Vol. 74, No. 126, the Notice of Availability that was provided in the June 25, 2010 Federal Register/Vol. 75, No. 122 and the DRAFT EIS document's Description of the Proposed Action (Chapter 2) that NSA is proposing to locate and occupy up to 5.8 Million Square Feet (MSF) on Site M, commonly referred to as the golf course at Fort Meade. This action will be composed of three separate phases, involve up to 11,000 personnel, and occur over a period of 20 years. Approximately two-thirds of those personnel will be for expansion of the agency while the balance reflects a relocation of current positions from other locations. We have enclosed a copy of our comments at agency scoping to further demonstrate those areas in which we have previously noted concerns. Further, we have enclosed more detailed comments regarding water quality, emergency services and transportation network impacts from which we have drawn the concerns noted in this letter and we invite you to consider those detailed comments as well.

I. Regarding water resources and utilities, we offer the following comments:

- I. Growth at Fort Meade in terms of Base Realignment and Closure, Enhanced Use Lease, Grow the Army as well as the proposed Federal Action requested by the National Security Agency will place substantially increased demands on the

} AAC-1
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AAC-1: Increased demand on the Fort Meade Wastewater Treatment Plant (WWTP) from a four percent increase in personnel on the installation under the Proposed Action (approximately 4,333 people, as one-third of the total 6,500 personnel that would be affected by the Proposed Action are already on Fort Meade) would likely result in greater discharge of total nitrogen and other materials into the Patuxent River. However, discharge from blowdown associated with the facility's proposed 50-megawatt (MW) closed-loop chilled water system would be a primary wastewater generator and would have a lower nitrogen concentration than sanitary sewage. A preliminary estimate of the amount of water required for operation of the cooling tower is approximately 1 million gallons per day (mgd) (based on 20,000 gallons per day [gpd], per MW). If the average flow to the WWTP were to exceed 3.0 mgd from the Proposed Action and other actions ongoing and planned for Fort Meade, Fort Meade would, as stated in the conditions of their National Pollutant Discharge Elimination System (NPDES) permit for the WWTP, be required to notify the MDE and modify their existing permit. Fort Meade would identify technological innovations and BMPs that might be required during permit modification process. Also see response to similar Comment AAC-44, which identifies changes to specific sections of the EIS.

installation's waste water treatment plant (WWTP). While not reaching the design capacity of the plant, it is evident that the increased demands will likely result in greater discharge of total nitrogen and other materials into the Patuxent River. This river receives discharges from both Howard and Anne Arundel Counties waste water treatment plants that serve the planned growth areas in these jurisdictions. Therefore, we respectfully recommend that the Record of Decision for this environmental document clearly establish that it is the responsibility of the Department of Defense to identify how the Fort Meade WWTP will maintain the present capacity load through technological innovations and best practices.

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AAC-1

2. Anne Arundel County recommends the implementation of a minimum 100-foot forested riparian buffer adjacent to Midway Branch on the east border of the proposed site (Site M), encourages the use of the most recent MDE regulations regarding sediment and erosion control, in addition to incorporation of the Final Rule for the Clean Water Act (effective February 1, 2010) into site construction requirements. We also recommend that planning and design for the campus address the issues noted in the *Stream Corridor Assessment Report for Fort Meade*, developed by Maryland DNR in October 2005, which identified more than 107 potential environmental issues associated with the stream reaches on the installation. Additionally, further planning and design of the campus should provide for an investigation of the off-site downstream conditions to document receiving waterway stability, including evaluation of the adequacy of infrastructure to accommodate the increased run-off associated with the proposed Federal Action's increase in impervious surface. Please see the enclosure for more detailed discussions on each of these points. The County requests that each of these recommendations be included in the Record of Decision for this EIS.

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AAC-2

II. Regarding Public Safety impacts, the Anne Arundel County Fire Department has conducted a study of impacts to response times created by growth in population and employment. The Department's findings based on their analysis clearly indicates a deterioration in needed response times, an increase in requirements to provide emergency medical services and requirements for additional mutual aid. Again, detailed comments are provided as an enclosure to this letter. Anne Arundel County recommends that the Record of Decision identify how the Department of Defense (DoD) will address the impacts and impediments to public safety both in terms of response to incidents at NSA and on Fort Meade as well as incidents occurring outside the Federal reservation.

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AAC-3

III. Regarding Socio-Economic Impacts:

1. The DEIS identifies that the proposed Federal Action could increase the work force on Site M by approximately 11,000 persons working various shifts. Of that number, the DEIS indicates that approximately two-thirds of those would new personnel and the remainder would be workers relocated from other NSA activities. In the case of the BRAC/EUL EIS, the Federal Action assumed an increase in indirect employment based on an estimated EUL build out of 2 million square feet of office space with a standard of 200 square feet per person. There does not appear to be any estimate provided in this DEIS for either indirect or induced employment. It does not seem reasonable to assume that current relationships between DoD members and their contractor tail will not be carried forward with the approval of the proposed Federal Action. Not understanding the impact of increased employment beyond the numbers stated in DEIS limits the local jurisdictions' ability to plan for the additional increase

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AAC-4
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AAC-2: Thank you for the summary of storm water topics in this comment. See Comments AAC-11 through AAC-15, for which responses to detailed comments for each of these topics are provided.

AAC-3: Discussion on emergency services updated in Sections 3.11 and 4.11 to include information from the TriData report and discuss mutual aid between Fort Meade and Anne Arundel County. As circumstances dictate, DOD will review its mutual aid agreements with local jurisdictions to ensure adherence to acceptable public safety standards.

AAC-4: Text added to Section 4.11 regarding the potential for indirect and induced job growth, the exact magnitude of which (contractor or otherwise) cannot be easily ascertained. It is believed that, as nearly all of the jobs occurring at Fort Meade would relocate from the Baltimore and Washington metropolitan areas, there would be a relatively limited gross amount of change or impacts on jurisdictions within the immediate vicinity of Fort Meade.

in jobs that will result in increased travel demand on roads, increased demand for utilities, increased demand for housing within the region at various price points (especially at the lower and more scarce housing and rental costs), and increased demand for emergency services.



2. Relocations of approximately 3,700 current positions from areas outside the campus will result in an increase in vacant office space within western Anne Arundel County and eastern Howard County. Current vacancy rates are creating a dragging effect on rents and sales of current, or even new space. This impact is reflected in lower valuations on properties which creates a fiscal impact on the jurisdictions. What actions can DoD do to mitigate this impact?

IV. Regarding Transportation Impacts: At present, only the Annapolis Road (MD 175)/Ridge-Rockenbach Road (MD 713) intersection improvements are fully funded. All other improvements noted in DEIS are, at best, only funded for planning, *not* for design or construction in the vicinity of Fort Meade. Present traffic generated by current activities at Fort Meade impact local roadway capacity, and as noted above, seriously impairs emergency response. Traffic generated by the BRAC and EUL action at Fort Meade will further reduce available capacity. To date there has been little formal response by the Department of Defense or the Department of the Army to mitigate or off set either the current or the anticipated impacts. Additional traffic generated by the proposed Federal Action by NSA will only increase the demand leading to a longer recurring duration of network failures. The increase of approximately 7,300 direct employees will also result in approximately 2,500 additional AM and 2,600 PM peak hour vehicle trips (assuming a five percent mode share to transit), creates a need for additional access control point (ACP) capacity but none is identified in the DEIS. Further significant impacts to the highway network can result in public safety impacts, motorist and pedestrian safety impacts, increased congestion, and more deterioration of air quality. In its scoping letter of August 15, 2009, Anne Arundel County requested that the EIS address the transportation issue and demonstrate how it will be mitigated. The following are our responses and comments based on the review of the information provided in the DEIS:

1. Since the Transportation Network impacts assessment does not provide remedies for the conditions that are forecast to occur as a result of the Federal Action, Anne Arundel County requests that greater detail be provided to assist State and local planning and operating agencies in determining the extent of the impact to the network. Specific concerns are noted in the enclosure and we strongly recommend that due consideration be provided by the preparers of the EIS and the Record of Decision.
2. On page 4-10, the DEIS assumes a five percent mode share using transit. Anne Arundel County cautions the DEIS preparers that virtually no additional transit is funded and the current mode share (trips on transit) is lower than this estimate. We recommend that the ROD include requirements for NSA and Fort Meade, plus their contractors to participate in a transportation demand management program to substantially reduce anticipated vehicle trip generation, especially during peak hours of the adjacent roadways.



AAC-5: The DOD would not be responsible for mitigating current vacancy rates. Like any other lessee, the DOD is without authority to financially mitigate the economic effects of private-sector office space vacancies that occur as a result of consolidation actions. The DOD has adhered to its lease obligations; risks affecting loss or gain must be borne by the property owners. Office space vacated as a result of the Proposed Action would likely be vacated gradually over several years, rather than all at once, and would eventually be re-occupied in the long term, resulting in lesser impacts, particularly if the economy continues to recover. Vacated space could also be re-occupied by indirect jobs created or moving into the area as a result of development on Fort Meade. In addition, the presence of increased personnel would have a positive effect on private real estate and commercial real estate (service providers). Therefore, open office space would be offset by filling or building residential houses and commercial properties.

AAC-6: The impact assessment identifies recommended mitigation measures for the Proposed Action starting on Page 4-41 of the Draft EIS. The data used to conduct the transportation analysis have been provided to local stakeholders. The DOD is committed to continuing to work with MDOT, Anne Arundel County, Howard County, Prince George’s County, and local stakeholders to conduct further studies to minimize impacts on the transportation network as a result of the Proposed Action and to support transportation improvement projects as appropriate.

AAC-7: The EIS acknowledges the existing deficiencies and constraints associated with the public transit facility serving Fort Meade. Ridership is limited due to the inadequate service availability during peak hours and lack of service for the internal circulation within the installation. Considering the planned future transit improvements in Fort Meade area and the MOU between the DOD and local stakeholders to develop a TDM program to discourage the single-occupant vehicle use, a 5 percent transit share is assumed in the EIS analysis. The TDM program would offer choices to NSA and Fort Meade commuters to use alternative modes of transportation. On June 3, 2010, NSA and other agencies at Fort Meade signed the MDOT Interagency MOU to (1) support TDM program practices in support of growth at Fort Meade, (2) work to establish services from and to regional transit facilities, (3) develop commuting options, (4) support the Fort Meade Transportation Management Plan (TMP), and (5) participate in the Fort Meade Regional Ridesharing Coordination Center Advisory Board. Text has been added to EIS Section 4.2.5 regarding the MOU. The DOD is committed to continuing to work with MDOT, Anne Arundel County, Howard County, Prince George’s County, and local stakeholders to conduct further studies to minimize impacts on the transportation network as a result of the Proposed Action and to support transportation improvement projects as appropriate.

3. On page 4-39, Figure 4.2-21 (and other locations). The DEIS identifies and recommends improvements on locally-maintained roadways. Anne Arundel County is very concerned that this identification and recommendation was made without consultation with the County. The County is further concerned about improvements identified in the DEIS that will likely require additional environmental (National Environmental Policy Act—NEPA) clearance such as lane increases on the Baltimore-Washington Parkway and the Patuxent Freeway (MD 32). In neither instance are NEPA studies funded, nor improvements identified in financially-strained, air quality conforming regional transportation plans. If improvements can not be constructed due to lack of funding, or lack of concurrence from the various resource agencies, the DEIS must identify other strategies or improvements to offset the transportation-related impacts associated with the Federal Action. We recommend that language be provided in the ROD to address this concern.

AAC-8

4. The DEIS identifies a need for travel demand reduction strategies, but does not offer recommendations, or more importantly, identify sources of funding to implement these needed strategies. Previous studies prepared by Fort Meade such as the *Fort Meade Installation-Wide Traffic and Safety Engineering Study* (Gannett/Fleming, 2008), by the Regional Growth Management Committee (2009) and by Anne Arundel County and the Maryland State Highway Administration (2006, 2009) have shown that the combined Federal Actions for BRAC/EUL will result in extremely long periods of delay on roadways around Fort Meade. Adding more traffic generated by this Federal Action for Campus Development will only exacerbate this situation. Again, Anne Arundel County recommends that NSA and Fort Meade work collaboratively and aggressively to develop a transportation management plan and to implement that plan in advance of this increased trip generation created by these Federal Actions.

AAC-9

Anne Arundel County looks to NSA to implement the requirements noted in DoD Instruction No. 4715.9 Section 6.2.4 which identifies the need to develop and maintain an intergovernmental and public consultation procedure for this proposed Federal Action. This Federal Action will clearly be an activity that will have "...significant impacts on the human environment..." as it will impact both the natural and built environment. The County understands the importance of the Federal Action proposed for NSA at Fort Meade. We also see that this action, in addition to the BRAC/EUL and other increases in personnel and households at Fort Meade have a cumulative impact on the natural and built environment that has not been taken into account comprehensively. We continue to look forward to working with NSA in making the consultation process successful.

Should you have any questions, regarding our comments, please contact me or George Cardwell, Planning Administrator via e-mail at pzcard44@aacounty.org or via phone at (410) 222-7440.

S
incerey,

Robert C. Leib

AAC-8: Comment noted. These recommendations are the early steps in the planning process. It is acknowledged that additional planning studies for these recommendations would be required, and these planning studies would identify alternatives for these recommendations. Such studies and subsequent improvements would be pending availability of funding from DOD and state and local sources. The DOD is committed to continuing to work with MDOT, Anne Arundel County, Howard County, Prince George’s County, and local stakeholders to conduct further studies to minimize impacts on the transportation network as a result of the Proposed Action and to support transportation improvement projects as appropriate.

AAC-9: Comment noted. As a result of the analysis in the EIS, Section 4.2.5.2 recommends continued development of the Fort Meade TMP in coordination with local stakeholders. The TMP would identify management strategies, such as ride sharing, staggered work shifts, and enhancement of mass transit. In addition, a TMP has been developed for the proposed NSA development at Site M. The DOD is committed to continuing to work with MDOT, Anne Arundel County, Howard County, Prince George’s County, and local stakeholders to conduct further studies to minimize impacts on the transportation network as a result of the Proposed Action and to support transportation improvement projects as appropriate. The June 2010 Interagency TDM MOU demonstrates this commitment.

Special Assistant for BRAC/Education

Enclosures

cc: Larry R. Tom, Planning & Zoning Officer
Robert Ray, Chief, Anne Arundel County Fire Department
Ronald Bowen, Director, Department of Public Works
Carole Sanner, Assistant Planning & Zoning Officer, OPZ
George Cardwell, Planning Administrator, OPZ
Robert R. Hannon, President Anne Arundel Economic Development
Corporation

Anne Arundel County Detailed Comments
 DRAFT EIS Addressing Campus Development at Fort George G. Meade, Maryland
 August 6, 2010

August 11, 2010

Anne Arundel County Detailed Comments regarding the
 DRAFT *Environmental Impact Statement Addressing Campus Development*
 at Fort George G. Meade, Maryland, July 2010

I. Regarding water resources and utilities, we offer the following comments:

- | | |
|---|-----------------|
| <p>1. Growth at Fort Meade in terms of Base Realignment and Closure, Enhanced Use Lease, Grow the Army as well as the proposed Federal Action requested by the National Security Agency will place substantially increased demands on the installation's waste water treatment plant (WWTP). While not reaching the design capacity of the plant, it is evident that the increased demands will likely result in greater discharge of total nitrogen and other materials into the Patuxent River. This river receives discharges from both Howard and Anne Arundel Counties waste water treatment plants that serve the planned growth areas in these jurisdictions.</p> | <p>— AAC-10</p> |
| <p>2. On August 15, 2009, the County provided comments during the scoping phase of this Environmental Impact Statement (EIS) development. We are pleased to note that our comments, pertaining to water quality and storm water management within the Midway Branch subwatershed, have been recognized within the body of the Draft EIS. Further, we support the implementation of a minimum 100-foot forested riparian buffer adjacent to Midway Branch on the east border of the proposed site (Site M).</p> | <p>— AAC-11</p> |
| <p>3. We encourage the proponents to consider the most updated MDE regulations regarding sediment and erosion control, in addition to incorporation of the Final Rule for the Clean Water Act (effective February 1, 2010) into site construction requirements.</p> | <p>— AAC-12</p> |
| <p>4. The DEIS references a Stream Corridor Assessment Report for Fort Meade, developed by Maryland DNR in October 2005. This report identified more than 107 potential environmental issues associated with the stream reaches on the installation; a large portion of those identified issues occurred within the segment of Midway Branch adjacent to Site M. Anne Arundel County desires to see that the proposed action recognizes and addresses those identified issues and degraded sites with the end goal of improving the water quality and habitat of Midway Branch and recommends that those actions to address the identified issues are included in the Record of Decision.</p> | <p>— AAC-13</p> |
| <p>5. With respect to storm water management, the DEIS recognizes the 2007 Storm water Management Act and the requirement for implementation of ESD to the maximum extent practicable (MEP), and proposes to follow all State storm water management requirements. Anne Arundel County has updated the local storm water management ordinance to require local development to establish a point of investigation downstream of the development site where the drainage area is equal to ten times the development site area. Development projects within the County are required to</p> | <p>— AAC-14</p> |

AAC-10: Comment noted. Increased demand on the Fort Meade WWTP from the increase in personnel under the Proposed Action (approximately 4,333 people, as one-third of the total 6,500 personnel that would be affected by the Proposed Action are already on Fort Meade) would likely result in greater discharge of total nitrogen and other materials into the Patuxent River. However, discharge from blowdown associated with the facility's proposed 50-MW closed-loop chilled water system would be the primary wastewater generator and would have a lower nitrogen concentration than sanitary sewage. If the average flow to the WWTP were to exceed 3.0 mgd, Fort Meade would, as stated in the conditions of their NPDES permit for the WWTP, be required to notify the MDE and modify their existing permit. Also see response to Comment AAC-44.

AAC-11: Comment noted. Thank you for your support.

AAC-12: Added text to Section 4.6.3 regarding the *Draft 2010 Maryland Standards and Specifications for Soil Erosion and Sediment Control* and the Draft Erosion and Sediment Control Regulations Proposed Changes (Code of Maryland Regulations [COMAR] 26.17.01.00, October 15, 2009) and that DOD would comply with the current regulations affecting development of the site. Also added text regarding new 2010 MDE technical guidance on Environmental Site Design (ESD) (July 2010) and additional Clean Water Act Final Rule requirements.

AAC-13: A 100-foot forested buffer would be installed between Midway Branch and site development as stated in Section 4.6.3. Vegetation plantings would serve to improve habitat value along the stream.

AAC-14: As a Federal installation, activities on Fort Meade will comply with State of Maryland storm water management regulations in effect at the time of project initiation as stated in Section 4.6.3. Mitigation measures to reduce downstream impacts are identified in Table ES-5 and Section 4.6.3 and such will be considered for adoption in the ROD. New infrastructure would meet ESD and LEED Silver requirements and would be incorporated into project design as planning progresses.

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assess the adequacy of the development outfall by assessing the adequacy and stability of the closed and open storm drain infrastructure from the development site to this established point of investigation. This assessment uses County criteria for closed storm drain infrastructure and rapid stream assessment protocols for the open channels. These stream assessment protocols are found in the County's revised Storm water Practices and Procedures Manual found at (www.aacounty.org/Plan/ome/Resources/Practices_Procedures_Manual.pdf). A complete copy of the Stream Assessment Protocols can be downloaded from www.aacounty.org/DPW/Watershed/DownstreamAdequacyProtocols.cfm. A review of the DEIS indicates that it does not provide for an investigation of the off-site downstream conditions to document receiving waterway stability. Moreover, adequacy of the public infrastructure to accommodate the increased runoff associated with the proposed action's increase in impervious surface at Site M is not fully addressed. We urge the proponent to recognize and address these needs and that this process be identified in the Record of Decision.

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AAC-14

6. The DEIS indicates minimization of post construction storm water runoff would be achieved through implementation of nonstructural BMPs distributed throughout the development site. Further, structural BMPs will be used if additional storm water management is needed after ESD practices are implemented to the MEP. We feel it worthwhile to note that ESD BMPs are typically designed to control the runoff from up to a 1-year storm. Higher magnitude storms are generally not managed by ESD for water quality or quantity control. Additionally, it should be recognized that BMP performance diminishes over time as the infiltration capacity of the underlying soil diminishes, or if maintenance and repairs are not effectively implemented. Therefore, Anne Arundel County has developed a supplemental storm water management design control that can be implemented at the outfalls and receiving streams to assist in achieving groundwater recharge, water quality treatment, safe conveyance, energy dissipation, and potentially a zero surface water discharge system. This design control is known as the Step Pool Storm Conveyance System (SPSC). Information on the design steps, material specifications, and other details can be found at <http://www.aacounty.org/DPW/Watershed/StepPoolStormConveyance.cfm>. The County respectfully requests that this technique be added to the project storm water management tool box.

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AAC-15

II. Regarding Public Safety impacts:

1. The Anne Arundel County Fire Department has conducted a study of impacts to response times created by growth in population and employment. Of particular note in that study was the impact of new growth on response times from the Jessup/Maryland City area in which Fort Meade is located and from which response would be provided to emergencies occurring in the area around Fort Meade. That study analysis for the Jessup/Maryland City Area highlights current weaknesses as long response times with 90th percentile greater than 11 minutes and recommends that BRAC (even without NSA growth) may help justify additional emergency medical services (EMS). Further, the study indicates that BRAC (and NSA growth) may create additional EMS demand causing a need to require additional mutual aid. The County currently averages 15 EMS calls per month on Fort Meade property.

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AAC-16
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AAC-15: Comment noted. Thank you for your support.

AAC-16: Thank you for the comment. See response to Comment AAC-3.

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Demand forecasts for Jessup/Maryland City identify a 7% increase annually. The analysis for the Severn Area indicates a 90th percentile response time of over 11 minutes. Service demands in the Severn area continue to rapidly grow with demand forecasts for the Severn area estimated at 10% annually. When the additional NSA personnel and structures are included these estimates are likely understated. The transportation analysis indicates hours of severe congestion along MD 175 the route used for response to Fort Meade incidents from County fire stations. With no identified and funded highway improvements, response times will continue to deteriorate as a result of increased traffic demand generated by the proposed Federal Action. The number of employees at Site M alone should cause reason to consider to increasing the EMS services available on Ft. Meade. However, we also are concerned about the increased demand on fire and EMS services that will be caused by the additional traffic on and around Fort Meade. Providing additional EMS capacity on Fort Meade will help reduce demand on mutual-aid services and help control response times both on post and for Anne Arundel County units. Anne Arundel County recommends that the Record of Decision identify how the Department of Defense (DoD) will address the impacts and impediments to public safety both in terms of response to incidents at NSA and on Fort Meade as well as incidents occurring outside the Federal reservation.

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AAC-16

AAC-17: Thank you for the comment. See response to Comment AAC-4.

AAC-18: Thank you for the comment. See response to Comment AAC-5.

III. Regarding Socio-Economic Impacts:

1. The DEIS identifies that the proposed Federal Action could increase the work force on Site M by approximately 11,000 persons working various shifts. Of that number, the DEIS indicates that approximately two-thirds of those would new personnel and the remainder would be workers relocated from other NSA activities. In the case of the BRAC/EUL EIS, the Federal Action assumed an increase in indirect employment at a likely relationship of one contractor (indirect employee) for each DoD member (direct employee). There does not appear to be any estimate provided in this DEIS for either indirect or induced employment. It does not seem reasonable to assume that current relationships between DoD members and their contractor tail will not be carried forward with the approval of the proposed Federal Action. Not understanding the impact of increased employment beyond the numbers stated in DEIS limits the local jurisdictions' ability to plan for the additional increase in jobs that will result in increased travel demand on roads, increased demand for utilities, increased demand for housing within the region at various price points (especially at the lower and mores scarce housing and rental costs), and increased demand for emergency services.
2. Relocations of approximately 3,700 current positions from areas outside the campus will result in an increase in vacant office space within western Anne Arundel County and eastern Howard County. Current vacancy rates are creating a dragging effect on rents and sales of current, or even new space. This impact is reflected in lower valuations on properties which creates a fiscal impact on the jurisdictions. What actions can DoD do to mitigate this impact?

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AAC-17
AAC-18

IV. Regarding Transportation Impacts: At present, only the Annapolis Road (MD 175)/Ridge-Rockenbach Road (MD 713) intersection improvements are fully funded. All other improvements noted in DEIS are, at best, only funded for planning, *not* for

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design or construction in the vicinity of Fort Meade. Present traffic generated by current activities at Fort Meade impact local roadway capacity, and as noted above, seriously impairs emergency response. Traffic generated by the BRAC and EUL action at Fort Meade will further reduce available capacity. Sadly, at present there has been little formal response by the Department of Defense to mitigate or off set either the current or the anticipated impacts. Additional traffic generated by the proposed Federal Action by NSA action will only increase the demand leading to greater durations of network failures. Further significant impacts to the highway network can result in public safety impacts, increased congestion, deterioration of air quality and motorist safety. In its scoping letter of August 15, 2009, Anne Arundel County requested that the EIS address this issue and demonstrate how it will be mitigated. The following are our responses and comments based on the review of the information provided in the DEIS:

- | | |
|---|-----------------|
| <p>1. On page 3-14 and elsewhere in the document, the transportation analysis, results, findings and recommendations are based on SYNCHRO (HCS+) analysis. This is a static tool that does not adequately reflect the impact of increased traffic in the traffic stream, both along the mainline as well as cross streets. Tables only reflect a letter grade level of service (LOS), but LOS F should be reflected with the amount of delay and especially the amount of delay along approaches of major intersections.</p> | <p>— AAC-19</p> |
| <p>2. On page 4-8 and Table 4.2-2, the DEIS does not reflect increased trip generation of non-BRAC and EUL activities which are also known to be transferred to Fort Meade. Among others, this would include the U.S. Navy's 10th Fleet Cyber Command.</p> | <p>— AAC-20</p> |
| <p>3. On page 4-8 and Table 4.2-3, the DEIS should identify the method by which traffic was distributed.</p> | <p>— AAC-21</p> |
| <p>4. On page 4-10, the DEIS assumes a five percent mode share using transit. Anne Arundel County cautions the DEIS preparers that virtually no additional transit is funded either in operations or capital equipment and present mode shares are lower than this estimate.</p> | <p>— AAC-22</p> |
| <p>5. On page 4-35, Section 4.2.5 Recommendations should also include Prince George's County as a jurisdiction involved with any region-wide transportation study. We concur that Howard and Anne Arundel Counties should be part of that study along with the Maryland Department of Transportation and its modal administrations.</p> | <p>— AAC-23</p> |
| <p>6. On page 4-39, Figure 4.2-21 (and other locations), Anne Arundel County is very concerned that the DEIS recommends improvements on locally-maintained roadways are identified without first consulting the County. It is further concerned about improvements identified in the DEIS that will likely require additional environmental (National Environmental Policy Act—NEPA) clearance such as lane increases on the Baltimore-Washington Parkway and the Patuxent Freeway (MD 32). In neither instance are NEPA studies funded, or improvements identified on financially-strained, air quality conforming regional transportation plans. If improvements can not be constructed due to lack of funding, or lack of concurrence from the various</p> | <p>— AAC-24</p> |

AAC-19: The data used to conduct the transportation analysis have been provided to local stakeholders. Also see response to Comment AAC-32.

AAC-20: The number of personnel involved in the Navy Cyber Command relocation action to Fort Meade is within the margin of error generated by the transportation analysis. The transportation analysis considered the major foreseeable development planned on Fort Meade to date. This action has been added to the list of projects considered for cumulative impacts in Section 5.

AAC-21: Citations added to Table 4.2-3 to identify the sources of trip distribution.

AAC-22: Thank you for the comment. See response to Comment AAC-7.

AAC-23: Text revised per comment.

AAC-24: Thank you for the comment. See response to Comment AAC-8.

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resource agencies, the DEIS must identify other strategies or improvements to off set the transportation-related impacts associated with the Federal Action.

↑ AAC-24

7. On page 4-41 (and in other locations), the DEIS does not identify any need to make geometric and/or operational improvements at the various access control points (ACP) or gates through which the additional trips will enter the campus. The DEIS does identify (but does not indicate source of funding) various improvements off the campus on public roads, but actually these improvements, especially intersection geometric improvements adjacent to the ACPs will be of little value in off-setting the impact of increased travel demand without substantial improvements to those ACPs. Those improvements will require other studies and funding from the Surface Deployment and Distribution Command.

↑ AAC-25

8. The DEIS identifies a need for travel demand reduction strategies, but does not offer recommendations, or more importantly sources of funding to implement these needed strategies. Previous studies prepared by Fort Meade such as the *Fort Meade Installation-Wide Traffic and Safety Engineering Study* (Gannett/Fleming, 2008), by the Regional Growth Management Committee (2009) and by Anne Arundel County and the Maryland State Highway Administration (2006, 2009) have shown that the combined Federal Actions for BRAC/EUL will result in extremely long periods of delay on roadways around Fort Meade. Adding more traffic generated by this Federal Action for Campus Development will only exacerbate this situation. Therefore, the County again recommends that NSA and Fort Meade work collaboratively and aggressively to develop a transportation management plan and to implement that plan in advance of this increased trip generation created by these Federal Actions.

↑ AAC-26

V General Comments noted during review of the DEIS:

NSA EIS Comments, Preliminary

1. Page 2-1: Noted in EIS is consideration of multi-level parking. This should be identified in EIS as a means of reducing privately owned vehicle use through management of parking and cost to provide parking

↑ AAC-27

2. Page 2-11: Transportation Comment: EIS takes "credit" for unfunded projects along MD 175 and MD 198. The document should reflect that neither project is funded beyond the planning phase of project development.

↑ AAC-28

3. Page 2-15: Land use development: EIS needs to be updated to reflect more current conditions regarding land development in and around Ft Meade.

↑ AAC-29

4. Page 3-4: Comprehensive Expansion Management Plan (CEMP): Claims new plan of 2005 (unseen by local government). Prior plan established a threshold of 33 people per acre. Does this relationship still hold true?

↑ AAC-30

AAC-25: Text added to Section 4.2.5.1 identifying that access control point improvements would likely be required to accommodate increased traffic levels.

AAC-26: Thank you for the comment. See response to Comment AAC-9.

AAC-27: Comment noted. This will be considered as planning progresses and evaluated as part of continued development of the Fort Meade TMP and the Site M TMP in coordination with local stakeholders.

AAC-28: The EIS acknowledges that these improvements are planned. Text added to Section 2.5 to clarify that construction activities associated with these transportation projects remain unfunded.

AAC-29: Text revised in Section 2.5 per the latest proposed project information publicly provided by the Anne Arundel County Office of Planning and Zoning.

AAC-30: The 2005 Comprehensive Expansion Master Plan (CEMP), which was developed as a tool to estimate the carrying capacity on the installation, continued to identify a threshold of 33 people per acre as an overall starting point. The threshold can be higher on a local level. Fort Meade is currently revising its Master Plan to include ongoing and future actions, including BRAC and use of Site M.

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- 5. Page 3-9: Document should reflect changed name of Corridor Transportation Corporation to Central Maryland Regional Transit. } AAC-31
- 6. Page 3-14 and elsewhere: DEIS uses SYNCHO (HCS+) for traffic analysis. This is a static tool and does not adequately reflect impact of traffic flow, both along mainline and in particular to the County at cross streets where traffic generated by county residents and businesses would be impacted adversely due to NSA and Ft Meade generated traffic. } AAC-32
- 7. Page 3-39: Waste Water, Existing Discharge: Document claims 3 MGD. County's Master Plan of Water Supply and Sewerage Systems identifies 2.5 MGD with a design capacity of 4.5 MGD for the Fort's treatment plant. } AAC-33
- 8. Page 3-82: Table 3.11-5: School Districts. County has 12 high schools of which Meade High School is presently closed. Document indicates 15 high schools. } AAC-34
- 9. Page 4-8: Table 4.2-2: Trip Generation: Other agencies besides BRAC actions and EUL are coming to FGGM, they do not seem to be included in this trip generation table. } AAC-35
- 10. Page 4-8: Table 4.2-3: Trip Distribution: Source of assumption seems to be missing or difficult to find. If this is the existing source, under what set of assumptions should we assume distribution of new traffic (plus BRAC and EUL traffic) should be the same as existing condition. } AAC-36
- 11. Page 4-10: Study assumes a 5 percent mode share to transit. While not huge numbers assigned to transit, there is still no funded transit system available beyond the existing two-hour headway service. What are these people using that constitutes transit? } AAC-37
- 12. Page 4-16 (and other locations): Table 4.2-5: LOS Comparison: LOS F is not a simple measurement. If SYNCHRO (HCS+) used, table should reflect average delay by intersection evaluated. } AAC-38
- 13. Page 4-35: Section 4.2.5-Recommendations: Region-wide transportation study needs to include Prince George's County as well. Study should be funded by DoD with consultants managed through a SHA-plus-jurisdictional management team. } AAC-39
- 14. Page 4-39: Figure 4.2-21 (and other locations): We object to recommended improvements on local roads where there has been no coordination with local agencies with jurisdiction over roadways. Recommended geometric improvements require NEPA level clearance which may not be possible such as additional lanes on BW Parkway, MD 32, MD 295, etc. If environmental } AAC-40

AAC-31: Section 3.2.2.2 revised per comment.

AAC-32: Synchro is industry-wide standard software used to model the transportation network for corridor traffic impact analysis at microscopic level. It is generally concurred that Synchro provides quality traffic impact analyses for signalized intersections in isolation and in the network in terms of Measures of Effectiveness such as delay, level of service (LOS), and back of queue.

AAC-33: Where appropriate, text revised in Sections 3.9.3 and 4.9.3 to state that the current flow to the WWTP is 2.5 mgd. The maximum permitted flow capacity for the WWTP without NPDES permit modification is 3.0 mgd.

AAC-34: Table and discussion in Section 3.11 regarding the number of high schools in Anne Arundel County updated per comment.

AAC-35: Thank you for the comment. See response to Comment AAC-20.

AAC-36: Thank you for the comment. See response to Comment AAC-21.

AAC-37: Thank you for the comment. See response to Comment AAC-7. Existing transit options are identified in Section 3.2.2.2.

AAC-38: See responses to Comments AAC-19 and AAC-32.

AAC-39: Text revised in Section 4.2.5 to include Prince George's County per comment. The DOD is committed to continuing to work with MDOT, Anne Arundel County, Howard County, Prince George's County, and local stakeholders to conduct further studies to minimize impacts on the transportation network as a result of the Proposed Action and to support transportation improvement projects as appropriate.

AAC-40: Thank you for the comment. See response to Comment AAC-8.

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August 6, 2010

clearance (not currently being studied) is not possible, then improvements can not occur. If improvements can not occur, the document needs to identify contingency improvements or other strategies that NSA DoD will employ to mitigate their impact created by the preferred alternative.

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AAC-40

15. Page 4-41 (and other locations): Study does not identify needed gate (ACP) geometric improvements and operations. Adding capacity outside or inside the fence line still does not address the inability of the ACPs to convey the traffic leading to false impressions of improvement.

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AAC-41

16. Page 4-46: Study identifies several transit projects that lack either any or any sustained operations or capital funding. Planned improvements are not programmed improvements and only those will carry demand.

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AAC-42

17. Page 4-46: TOD assumptions at Odenton are not correct. Coordination with local government or at least MDOT is needed to offer correct assumptions.

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AAC-43

18. Page 4-83: Waste Water System: Document should reflect that changes in permitted treatment capacity at the Fort's plant will result in likely economic impacts to waste water plans that discharge into the same water body (Patuxent River) for Howard and Anne Arundel Counties.

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AAC-44

19. Page 4-86: Pavements: DEIS recommends 85% satisfaction of parking demand. BRAC indicated satisfying 70% of the parking demand. Why the difference and when so much of the impact is automobile generated. Reducing parking supplied should decrease travel demand. It is not clear why the study should not identify reduced parking as both a means to contain costs as well as reduce off site impacts.

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AAC-45

AAC-41: Thank you for the comment. See response to Comment AAC-25.

AAC-42: The distinction between planning and programming of funding is appreciated. DOD continues to ensure adequate traffic capacity through good analysis, engineering, and physical improvements. Coordination with local authorities to plan improvements and identify funding sources is a necessity.

AAC-43: The Transit Oriented Development assumptions at Odenton in Section 4.2.5.2 were revised following consultation with the Anne Arundel County Office of Planning and Zoning. Due to inadequate sewer and water facilities in the area, completion by 2015 will not be accomplished. Considering the infrastructure constraints and on-going economic fluctuation, the development is not anticipated to be completed before 2020.

AAC-44: Text regarding this issue has been added to the Infrastructure paragraph in Section 5.1 Cumulative Impacts. Determining the economic impact on WWTPs and permitted discharges from increased development throughout the Patuxent River watershed would require additional and separate study.

AAC-45: The parking demand presented in the Draft EIS was incorporated from the NSA Real Property Master Plan. The amount of parking will be considered as planning progresses and evaluated as part of continued development of the Fort Meade TMP and the Site M TMP in coordination with local stakeholders.



FORT MEADE REGIONAL GROWTH MANAGEMENT COMMITTEE (RGMC)
44 Calvert Street, MS 330 ■ Annapolis, Maryland 21401 ■ 410-222-1227
Bob Leib, Regional Coordinator rleib@aaacounty.org

August 13, 2010

Campus Development EIS
c/o HDR|e2M
2600 Park Tower Drive #100
Vienna, VA 22180-7342

Gentlemen:

The Fort Meade Regional Growth Management Committee is pleased to submit the attached comments on the Campus Development Draft EIS.

Our comments are focused on the local and regional transportation impacts of the proposed action, all of which are viewed as significant. We recommend a broadening of scope, a more rigorous quantification of transportation system capacities, loads and impacts, along with ongoing efforts aimed at mitigating the impacts.

Thank you for the opportunity to participate in the process. We look forward to the outcome of this phase, and continue to support the efforts of NSA, Fort Meade and its constituent agencies to implement expansion plans while addressing the impacts that accompany growth.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert C. Leib".

Robert C. Leib
RGMC Coordinator

A handwritten signature in black ink, appearing to read "Kent Menser".

Kent Menser
RGMC Deputy Coordinator

August 12, 2010

**FORT MEADE REGIONAL GROWTH MANAGEMENT COMMITTEE
REVIEW OF NSA DRAFT EIS DATED JULY, 2010**

In its August, 2009 submission pursuant to NSA's request for input on EIS scoping, the Fort Meade Regional Growth Management Committee ("RGMC") made three recommendations and provided comprehensive information pertaining to the regional transportation impacts of Fort Meade (see attached).

The July, 2010 Draft EIS does not effectively respond to the RGMC recommendations and fails to take advantage of the full range of information provided by the RGMC in its 2009 submission. Accordingly, the RGMC recommends the following:

1. **Expand EIS Scope.** The transportation footprint and impact of NSA and Fort Meade are regional in scope. Therefore, the environmental assessment for transportation should also be regional in scope. The capacity and performance of the regional road system is of critical importance to the mission of NSA. It gives NSA access to a manpower marketplace of unequalled quality, provides connectivity with contractors and customers, and serves an important role in dealing with emergencies. Congestion and other forms of service disruption anywhere in the system can have negative consequences with respect to NSA's mission. NSA and the other major tenant groups at Fort Meade – working through the Department of Defense – should collaborate with other major employers and the affected jurisdictions in the region to formulate a regional development, infrastructure and transportation strategy.

} RGMC-1

The NSA main campus workforce – currently estimated at 25,000– resides across the region. More than 60% live in jurisdictions other than Anne Arundel County (39%). The other main jurisdictions are Howard County (22%), Baltimore City/County (13%), Carroll County (7%), and Prince George's County (6%). The remaining 14% live in numerous other jurisdictions around the region. Defining the region as comprising the six named jurisdictions would cover about 85% of the workforce footprint and the transportation systems serving that population.

In addition to the direct NSA workforce, it is estimated that NSA contractor jobs equal two times the direct workforce, for an additional potential 50,000 jobholders presumably distributed similarly across the region. Accordingly, the combined impact of 75,000 commuters of which at least 60% reside and/or work in a jurisdiction other than Anne Arundel County demands a regional approach to planning for any growth at NSA. And, because the external environment is equally affected by any growth at Fort Meade, NSA growth plans should be combined with all other growth

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plans to provide a comprehensive view of regional capacities, impacts and gaps.

Nearly all of the NSA workforce, including contractors, gets to work by private automobile. The average commute is estimated at 20 miles. Therefore, the impact of NSA operations on the regional road system just from commuting is enormous, as is NSA's dependency on the system. For the direct workforce of 25,000 alone, the daily two-way impact would be in the range of 1,000,000 vehicle miles traveled. Including the indirect workforce would triple this figure.

Every major highway in the region is affected by this load. Although an estimated 90% of NSA traffic arrives on MD-32 and MD-295, the draft EIS fails to measure either the capacity or the loads on these two critical components. Successful operations at NSA also depend on major routes feeding MD-32 and MD-295, including: I-695, I-495, I-70, I-97, I-95, MD-100, MD-175, MD-198, US-29, US-1. The addition of load to these feeder routes will further impair the ability of NSA and other employers in the region to fulfill missions, to attract and retain key skills and to deal with emergencies.

2. **Quantify Regional Transportation System Capacity.** Evaluating the ability of the regional transportation system to handle current and future traffic volumes requires quantification of the system's capacity. For system links, the best measure would be vehicle miles handled at peak hour at a specified quality of service level. For system nodes (interchanges, intersections and access control points), the measure would be vehicles handled per hour at peak. System capacity should be today's capacity, plus any approved and funded upgrades, projected into the future. Such an analysis should include and correspond to the major highways and jurisdictions named in paragraph 1.

The use of FGGM 2005 Fort Meade master planning materials in the evaluation of internal roadway needs should be reconsidered, or the scope of planning broadened to include all projected growth and its external impacts. In preparing its January, 2009, analysis of internal transportation needs at Fort Meade, Gannett Fleming compiled a list of "Master Plan Projects" (Exhibit 8.2) and a corresponding "Projects Map" (Exhibit 8.3).

} RGMC-2

Gannett Fleming then developed traffic volumes "...for the future condition by adding new trips generated by proposed development, to the existing volumes." The report concluded: "Required [roadway] improvements such as those above are not likely to be feasible, suggesting that the master plan be modified over the coming years to something that a more reasonably sized roadway network could support. It is possible for the

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amount of traffic generated by the master plan to decrease, if in the future improved accessibility to transit occurs for Fort Meade."

3. **Quantify Transportation System Load.** For each of the components of the regional transportation system cited above, it is critical to quantify today's load plus increases in load over the forecast period due to growth and development. **The draft NSA EIS contains only a limited, incomplete analysis of load for selected intersections within Fort Meade and in the immediate Fort Meade area.**

Measuring system load requires establishing a baseline of information on the scale of existing development at Fort Meade, the size of the workforce, and the current level of ambient and Fort Meade-related traffic during peak periods. To the current measurements, the EIS would add growth in building space, workforce and ambient traffic levels. It would use the existing conditions and the relationships among the key factors to validate assumptions regarding growth in workforce and traffic.

RGMC-3

All of this prospective analysis would be completed in alignment with the regional scope and capacity described in the paragraphs above. We support the EIS's recommendation that a regional traffic study be completed, either as part of the EIS or as an immediate follow on project.

RGMC-4

4. **Evaluate System-Wide Performance Gap.** By quantifying both system capacity and system load with consistent measurements and calculating the differences between them, it becomes possible to isolate those parts of the system in which existing shortfalls or system degradation over time could affect the ability of NSA and its workforce to ensure appropriate access over time. **Because capacities and loads have not been quantified, and because the scope is narrow, the full impact of the proposed expansion is not fully evaluated. Therefore, it is not currently possible to identify deficient components in the regional transportation system as a first step in any remediation process.**

The limited analysis that was performed for the EIS references work previously completed by the State Highway Administration, and expresses its conclusions in terms that are of limited value to local businesses and individuals directly affected by growth at Fort Meade. For example, the results of the intersection analyses included in the EIS study are expressed in Level of Service (LOS) impact. Barring improvement, a failing intersection (LOSE or F) continues to be a failing intersection no matter how much load is added. Most of the key intersections are today failing or close to failing.

RGMC-5

For example, an intersection that can handle 3,000 vehicles per hour would fail if waiting times exceed a stated threshold, whether the actual load is 3,500 vehicles per hour or 4,500 vehicles per hour. However, the

RGMC-3: Thank you for the comment. See response to Comment RGMC-2.

RGMC-4: Thank you for the comment. See response to Comment RGMC-1.

RGMC-5: Thank you for the comment. See response to Comment RGMC-1.

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waiting time for the average vehicle will be considerably greater with load at 4,500 than at 3,500. Therefore, the analysis should state the impact of additional load in terms of quantified waiting times rather than the qualitative LOS values.

The RGMC has calculated that many intersections will require peak waiting times of 30 minutes or more without effective, short-term remediation. Should this occur, not only NSA and Fort Meade but also people living in the area of Fort Meade who commute to jobs elsewhere in the region will be severely affected by the growth in traffic volume arriving at or leaving Fort Meade during peak periods. The EIS does not address the impact of delays on local residents. The comparison of load and capacity should be completed for all major roadway components both locally and across the entire NSA service area as defined above.

5. **Expand Description of Required Mitigation Steps.** Because the performance gap is not quantified, it is not possible to evaluate any mitigation plan based on the information contained in the draft EIS. It is clear, however, that the limited transit programs described in the draft EIS will have virtually no impact on the traffic volumes generated by Fort Meade— now or in the future.

Nonetheless, work completed by other organizations provides strong evidence of the scope of effort required to mitigate the impact of growth at Fort Meade:

- a. **State Highway Administration (SHA).** The State Highway Administration has documented the need to comprehensively upgrade MD-198 and MD-175 in the vicinity of Fort Meade. These two projects alone would require \$600 million in new funding. Preliminary analysis suggests the need to upgrade other major highways within 5 miles of Fort Meade.
- b. **Gannett Fleming.** In its January, 2009 report, Gannett Fleming outlined a \$50 million internal Fort Meade upgrade program comprising 15 roadway and ACP projects. Even though this program is required to support BRAC – much less NSA’s development program – to date only one of the 15 has received funding for a total of \$1.4 million.
- c. **Department of the Army.** In its Record of Decision supporting BRAC 2005 at Fort Meade, the Department of the Army committed to development of a transportation demand management program for Fort Meade.

Fort Meade Regional Growth Management Committee (“RGMC”). The RGMC conducted a series of analyses to quantify



RGMC-6: The EIS identifies that baseline traffic levels are significantly adverse, and would continue to deteriorate under the Proposed Action. The EIS recommends mitigation measures to reduce these impacts. The DOD is committed to working with RGMC, Anne Arundel County, and local stakeholders to enable study and implementation of these measures, and to development of a regional transportation study. See response to Comment AAC-19 regarding waiting times.

RGMC-7: See response to Comment RGMC-6. The DOD is committed to continuing to work with the RGMC and local stakeholders to enable further study and implementation of these transit and TDM programs recommended in the EIS or otherwise.

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the impacts of growth. It determined that peak traffic delays of 30 minutes or more at peak periods would occur during and after BRAC.

To address this impending challenge, the RGMC has developed a two-part strategy combining a limited number of internal and external roadway projects with a new Transportation Demand Management ("TDM") program.

The strategy assumes that by 12/31/2010 Fort Meade will expand its gate and internal roadway capacity by 1,400 vehicles per hour using temporary means and that key projects will be completed on MD-175 by 12/31/2011. Given these assumptions, the RGMC calculated that a TDM program reducing SOV volume by 27% could barely offset the effects of growth. The RGMC has extended the analysis to show how a TDM goal of 27% might be implemented through a collaborative effort by all Fort Meade tenant agencies across the region. The additional growth required by expansion of the NSA campus would require a commensurate increase in the TDM goal.

RGMC-8

RGMC-8: Comment noted. The DOD looks forward to continuing to work with the RGMC on the TDM program.

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Comments on

"Draft Environmental Impact Statement
Addressing Campus Development at
Fort George G. Meade, Maryland (July 2010)
National Security Agency"

By
John N. Howley
MarylandEnergyReport.org

August 16, 2010

The National Security Agency (NSA) is planning a major expansion of its facilities in Ft. Meade, Maryland ("Site M"). Under the National Environmental Policy Act (NEPA), NSA is required to prepare an Environmental Impact Statement (EIS). The Draft EIS (DEIS) for "Site M" was released in July 2010.

The NEPA focuses on ensuring that federal agencies perform a complete and appropriate environmental assessment so that subsequent decisions are made with a full understanding of environmental impacts. The DEIS is deficient with respect to (1) the analysis of the greenhouse gas (GHG) emissions impact of the proposed action and (2) failure to consider a Zero-Net-Energy Alternative for the Proposed Action.

1. The DEIS Neglects Significant Government-wide Initiatives on Energy and Climate

Nancy Sutley, chair of the WH Council on Environmental Quality, has stated that the built environment contributes about 39 percent of total U.S. primary energy consumption during a July 20, 2010, White House Clean Energy Economy Forum. The federal government is the largest single energy consumer in the United States with a \$24 billion utility and fuel bill in 2008.

Executive Order 13514 states: "It is...the policy of the United States that Federal agencies shall increase energy efficiency; measure, report, and reduce their greenhouse gas emissions from direct and indirect activities..." EO 13514 goes on to say that: "beginning in 2020 and thereafter, ensuring that all new Federal buildings that enter the planning process are designed to achieve zero- net-energy by 2030..."

On January 29, 2010, President Obama announced that the federal government will reduce its GHG emissions 28 percent by 2020. On the same day, the U.S. Department of Defense announced an even more aggressive goal of reducing GHG emissions from non-combat activities 34 percent by 2020. (This DOD goal is noted on page 4-63 of the DEIS.)

The DEIS makes only vague, inconclusive and general references to improving the management of energy and GHG emissions despite these high-profile and significant government-wide and DOD-specific initiatives.

JH-1

2. The DEIS Needs to Clarify Accounting for GHG Emissions from Purchased Electricity

Paraphrasing EO 13514, the DEIS says:

Direct activities include sources the agencies own and control, and from the generation of electricity, heat, or steam they purchased. (See p. 3-28, DEIS.)

The EO 13514 delineates categories of GHG emissions as follows:

- (k) "scope 1, 2, and 3" mean:
 - (i) scope 1: direct greenhouse gas emissions from sources that are owned or controlled by the Federal agency;
 - (ii) scope 2: direct greenhouse gas emissions resulting from the generation of electricity, heat, or steam purchased by a Federal agency; and
 - (iii) scope 3: greenhouse gas emissions from sources not owned or directly controlled by a Federal agency but related to agency activities such as vendor supply chains, delivery services, and employee travel and commuting; (See page 14, EO 13514.)

Guidelines to implement EO 13514 state that

Agencies must account for and report indirect emissions associated with consumption of purchased or acquired electricity...as scope 2. (See page 11, Federal Greenhouse Gas Accounting and Reporting Guidance DRAFT (July 2, 2010).)

There is a potential for confusion when using the terms "direct" or "indirect" to refer to GHG emissions from the generation of electricity purchased from a local utility. As NSA develops a comprehensive inventory of projected GHG emissions for the Proposed Action that includes purchased electricity, these terms will need to be used carefully. Such an inventory should be included in the final EIS.

JH-2

3. NSA's DEIS Does Not Fully Account for GHG Emissions

The DEIS cites Executive Order 13514, explaining that it "specifically requires federal agencies to measure, report and reduce their greenhouse gas emissions from both their direct and indirect activities." (See DEIS, page 3-28.) Further, the DEIS notes that "NSA is in the process of inventorying the GHG emissions and setting reduction goals for year 2020 as outlined in [EO 13514]. (See DEIS, page 3-28.)

JH-1: Comment noted. The EIS clearly acknowledges the governmentwide and DOD-specific initiatives on energy and climate in Section 3.4. The EIS focuses on the current state of greenhouse gas (GHG) planning at the Federal level. Inventorying GHG emissions at all Federal agencies, including NSA, is the current stage of the process outlined in Executive Order (EO)15314. NSA is committed to continue to act in accordance with EO 13514 within the framework of the DOD-wide efforts to reduce GHG emissions.

JH-2: For the purposes of simplicity in the EIS, text added to Section 3.4.2 to clarify that Scope 1 and 2 GHG emissions were deemed "direct" and scope 3 GHG emissions were considered "indirect." NSA is in the process of developing, and will continue to maintain, a GHG inventory as required by EO15314. It is expected that there would be a net decrease in GHG emissions associated with the Proposed Action. The new facilities would be more energy-efficient than those previously use by NSA for the same purposes.

Despite NSA's awareness of EO 13514 and its apparent commitment to inventorying its GHG emissions, the DEIS fails to estimate fully the projected GHG emissions associated with the Proposed Action on either an annual or cumulative basis.

There are two categories of new GHG emissions associated with the development of "Site M." One category of GHG emissions is the "Scope 1" direct GHG emissions resulting from the operation of newly constructed fossil-fuel-burning equipment including standby power generators and boilers. On page 4-63, it is noted that "the exact type of equipment is yet unknown."

A second category is the "Scope 2" GHG emissions associated with purchased, grid-supplied electricity. This inventory could be readily estimated for a range of likely power consumption profiles given the supply mix data presented in Table 3.9-2 on page 3-61. (This table shows that 51.2 percent of grid-supplied electricity derives from the combustion of coal, the most CO₂-intensive fuel.) Any estimate of GHG emissions from grid-supplied power should also account for transmission and distribution (T and D) system losses ("Scope 3 emissions").

While the DEIS does make passing reference to the direct GHG emissions from generators, boilers and construction activities, no annual or cumulative inventory is estimated. Furthermore, the GHG emissions associated with purchased electricity and increased commuter traffic seem have been largely ignored in the DEIS. (These comments give no further consideration to the impacts of commuter traffic.)

JH-3

To underscore this point, these comments provide an illustrative analysis of the GHG emissions for the purchased power for the proposed action.

The Proposed Action will require the consumption of large amounts of electricity during the course of its possibly twenty- to thirty-year operating life. The production of the electricity which will be drawn from the regional grid entails the production of significant amounts of greenhouse gas emissions.

The elements of this illustrative analysis of the indirect GHG emissions from purchased electricity for the Proposed Action are as follows:

1. The plan includes a 50 MW generator to provide back-up power for the Proposed Action which includes 1.8 million square feet of office space, data center and associated facilities. This power capacity translates to an upper bound estimate of the purchased electricity of 438,000 MWh annually.
2. Using the eGRID2007 Version 1.1 2005 GHG Annual Output Emission Rates for subregion RFC East and following the methodology in the DRAFT Federal Greenhouse Gas Accounting and Reporting Guidance Technical Support Document, the Scope 2 GHG emissions are estimated to be **227,582 MT CO₂e** annually.
3. Following the same methodology, the Scope 3 T&D losses are estimated to be **14,998 MT CO₂e** annually.

JH-3: Comment noted. Thank you for your interest. See response to Comment JH-2.

4. The total Scope 2 and Scope 3 GHG emissions from purchased electricity for the Proposed Action is **242,580 MT CO₂e** annually.
5. For comparison and using a 25 mpg vehicle emitting 7.3 tons of CO₂ per year, this is the equivalent of 33,230 cars.
6. Over twenty years, these GHG emissions would cumulate to **4.9 million MT CO₂e**.

These estimated GHG emissions are ten times greater than the 25,000 MT CO₂e threshold for direct emissions which the *NEPA Guidance* describes as a "reference point" (See *NEPA Guidance*, page 3).

The DEIS claims that "it is not expected that any of the activities outlined herein would interfere with the DOD's ability to meet their [DOD's] overall goal [34 percent reduction by 2020]." (See DEIS, page 4-63.) It is not clear how NSA concludes this without preparing a comprehensive inventory of GHG emissions through 2020.

JH-4

4. The DEIS Does Not Consider a Zero-Net-Energy Alternative

Measures that are both technically and economically feasible are readily available that would allow NSA to build and operate "Site M" as a Net-Zero-Energy facility. This would require maximum reductions in energy consumption and meeting the remaining needs through on-site distributed generation resources.

EO 13514 provides that:

...beginning in 2020 and thereafter, ensuring that all new Federal buildings that enter the planning process are designed to achieve zero- net-energy by 2030; (See EO 13514, page 4.)

On-site generation could include geothermal energy to provide heating and cooling. On-site renewable generation could reduce energy from the grid, including solar. On-site generation could also include advanced combined heat and power generation as well as fuel cells. Building design which maximizes daylighting and insulation can reduce the overall energy needs of the project. This list is illustrative and not exhaustive.

Such measures are indeed described on page 4-91 of the DEIS, concluding that they might "eventually provide energy independence for the facility." This goal is stated somewhat vaguely instead of being presented as a Zero-Net-Energy Alternative for the Proposed Action as it should be.

JH-5

Furthermore, the suggestion that efficiency and renewable energy can be built in later as retrofits flies in the face of the well-established principle that maximum benefit and cost savings can be achieved only by including such features from the beginning design stages of the project. (Viewed over the life cycle of the project, the Net-Zero-Energy Alternative can be very cost competitive. The up-front costs of on-site and renewable

JH-4: The GHG emissions analysis in the EIS recognized that one-third of the 6,500 personnel proposed to consolidate to Site M under the Proposed Action are already on-installation, and the remainder would come from locations within the Baltimore and Washington metropolitan areas. New hires would constitute less than 10 percent of the workforce consolidating at Fort Meade. Because the labor force would largely come from already existing positions in the region, regional GHG emissions would not be expected to be significant. In addition, the Proposed Action would contribute to DOD's overall GHG emissions reduction goal through use of energy efficient technology.

JH-5: It is not technologically and economically feasible to do a zero-net-energy data center at this time.

generation can be offset by entering into leasing arrangements with private-sector entities that would own and operate the facilities.)

A Net-Zero-Energy Alternative would be consistent with initiatives being undertaken elsewhere in the federal government. GSA Administrator Martha N. Johnson told a conference:

Within this context, we at GSA are embracing a zero environmental footprint goal. We are setting our sights on eliminating the impact of the federal government on our natural environment. Yes, you heard it correctly. The word is "eliminate" not "limit." I'm not kidding. Zero environmental footprint. (See U.S. Green Building Council Federal Summit.)

5. The DEIS Ignores State Energy Efficiency Goals

In 2007, Maryland Governor O'Malley announced the goal to meet a 15 percent per capita electricity reduction target by 2015 (against a 2007 baseline). The Maryland legislature adopted these goals as statute in 2008.

The DRAFT NEPA Guidance recommends that agencies preparing Environmental Impact Statements:

...consider applicable Federal, State or local goals for energy conservation and alternatives for reducing energy demand or GHG emissions associated with energy production. (See NEPA Guidance, page 5.)

The DEIS contains no reference to the EmPOWER Maryland goals.

] JH-6

6. The DEIS Ignores Deleterious Impacts on the Regional Electrical System

The addition of substantial power capacity and energy demands to the regional electrical system could have serious deleterious effects (in addition to the associated GHG emissions).

Firstly, these new demands will put upward pressure on prices in wholesale capacity and energy markets organized by the PJM Interconnection. These higher prices will affect households, businesses and governments across the state and region.

Secondly, increased power and energy demands associated with the Proposed Action could increase the pressure to construct the Potomac Appalachian Transmission Highline (PATH), a controversial, extra-high-voltage transmission facility that will connect the John Amos coal-fired power-generating station in West Virginia to a major new substation in Kemptown, Maryland.

JH-6: Although the Proposed Action is on a Federal installation and not subject to the EmPOWER Maryland initiative, sustainability measures (e.g., green roofs, water-use reduction, green power, energy-efficient building systems) are being considered for the project that can be cost-effectively integrated to meet LEED Silver requirements. BMPs and sustainable design techniques are adequately discussed in Section 4.9.6.

According to sworn testimony about this project that was filed with the Virginia State Corporation Commission by air-quality expert Chris James, the operation of PATH would lead to an uprating of coal-fired plants throughout the Ohio Valley resulting in a net increase in regulated emissions and CO2.

Construction and completion of the PATH transmission line will increase emissions of sulfur oxides (SO2), oxides of nitrogen (NOx), fine particulate (PM2.5), mercury and carbon dioxide (CO2). My analysis is conservative, and I believe that my analysis has understated the quantity of air pollution increase that would occur as a result of completion of the PATH transmission line. (See James, page 8.)

Furthermore, sworn testimony from transmission expert Hyde Merrill in the same case argues that the addition of long-distance, extra-high-voltage AC transmission lines to an electrical grid will increase its instability and vulnerability to disruptions. Construction of PATH:

...will lead to increasing reliance by the East Coast on remote coal-fired power plants with continuing or increasing transmission congestion, transmission losses, and a greater risk of cascading blackouts. (See Merrill, page 3.)

Increased reliance on power sourced from facilities like PATH undermines DOD's goal of enhancing surety of power supply. The recent NERC report: *High-Impact, Low-Frequency Event Risk to the North American Bulk Power System* is only the most recent in a long string of studies documenting the vulnerability of the bulk power system to disruptions caused by geomagnetic disturbances, operator error and/or deliberate attack.

JH-7

7. The DEIS Does Not Provide Adequate Information to Support NSA's National Security Mission

The DEIS does not provide adequate information to support NSA's national security mission in two ways: (1) Understating the GHG emissions impact of the Proposed Action does not help NSA managers to mitigate those emissions and (2) Ignoring the Zero-Net-Energy Alternative weakens energy management at Fort Meade.

In 2007, the Center for Naval Analysis published *National Security and the Threat of Climate Change* which found that:

In the national and international security environment, climate change threatens to add new hostile and stressing factors. On the simplest level, it has the potential to create sustained natural and humanitarian disasters on a scale far beyond those we see today. The consequences will likely foster political instability where societal demands exceed the capacity of governments to cope. (See CNA (2007), page 6.)

JH-7: It is speculative at best that the Proposed Action would be a significant contributor to the need for PATH. PATH will serve the needs of many, many customers, both private and public sector, and will occur independently of whether or not development on Site M occurs.

Climate change represents a major threat to the security of the United States. The managers of this Proposed Action seem to believe that any GHG emissions are too small to have a material effect. However, the United States Government faces significant "reputational risk" among its own population and throughout the globe in relation to human-caused climate change as concern and alarm over its increasingly apparent disastrous effects grows. This is because the United States historically is the largest source of the concentrations of the GHG emissions that have built up in the Earth's atmosphere since the Industrial Revolution.

The United States Government can mitigate this "soft-power" risk to its reputation by taking appropriate actions to demonstrate leadership on curbing GHG emissions. Failure to do so -- including failure to even consider a Zero-Net-Energy Alternative for the Proposed Action -- increases the risk to the government's reputation globally and the threats to national security that may flow from it in the future.

Increasing NSA's reliance on the bulk-power system ignores the growing body of analysis focusing on the problem of "high-impact, low-frequency events" such as a large-scale, sustained disruption of the electrical grid (see NERC). Construction of a 50 MW back-up generator is not necessarily the best way to mitigate this risk. A better approach would involve, in the first place, reducing NSA's need for grid power to the absolute minimum through energy efficiency and secondly by considering on-site power sources for the remaining power needs. In the words of *Powering America's Economy*:

At home, military installations are nearly completely dependent upon a commercial electric grid that is vulnerable to cyber attacks and natural disasters. The grid is becoming an even greater liability because U.S.-based military installations are increasingly being called upon to support real-time combat operations overseas (such as piloting Predator drones or processing battlefield intelligence). (See CNA (2010), page 3.)

It is natural that national security energy managers would associate enhanced security with larger and more energy-intensive facilities. However, the most innovative thinkers have recognized that this way of thinking is out-dated and dangerous in changed circumstances where security depends on a smaller environmental footprint and maximum energy efficiency.

Surety of supply has become increasingly important for DOD facilities within the domestic United States. Shrinking the need for grid-supplied power to the maximum feasible extent makes this problem more manageable. On-site generation can potentially eliminate the need for unreliable grid power entirely.

NSA managers also need to consider whether they can continue to attract the most talented young people in the future if they continue to construct facilities using outdated or cosmetic "green" features that do not fully address the environmental risks our nation faces.

The NSA should embrace the recommendations of CNA's Military Advisory Board in its "Roadmap for Energy Security."

- Priority 1: Energy security and climate change goals should be clearly integrated into national security and military planning processes.*
- Priority 2: DoD should design and deploy systems to reduce the burden that inefficient energy use places on our troops as they engage overseas.*
- Priority 3: DoD should understand its use of energy at all levels of operations. DoD should know its carbon footprint.*
- Priority 4: DoD should transform its use of energy at installations through aggressive pursuit of energy efficiency, smart grid technologies, and electrification of its vehicle fleet.*
- Priority 5: DoD should expand the adoption of distributed and renewable energy generation at its installations. (See CNA (2009), page ix.)*

The key recommendations of these comments -- (1) to account fully for the GHG emissions from purchased power of the Proposed Action and (2) to consider fully a Zero-Net-Energy Alternative -- conform entirely with CNA's "Roadmap for Energy Security."

} JH-8

Citizens have every right to expect that NSA's revisions to the Environmental Impact Statement Addressing Campus Development at Fort George G. Meade, Maryland, will reflect an understanding that minimizing GHG emissions and maximizing energy efficiency are integral to achieving the agency's national security mission -- rather than distracting from it.

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JH-8: Comment noted. Thank you for your interest.

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James, Chris; Direct Testimony IN RE: PATH ALLEGHENY VIRGINIA TRANSMISSION CORPORATION: APPLICATION FOR APPROVAL OF ELECTRIC FACILITIES UNDER THE UTILITY FACILITIES ACT DOCKET NO. PUE-2009-00043; Virginia State Corporation Commission; October 14, 2009.

Merrill, Hyde M.; DIRECT TESTIMONY OF HYDE M. MERRILL ON BEHALF OF THE SIERRA CLUB BEFORE THE STATE CORPORATION COMMISSION OF VIRGINIA; CASE NO. PUE-2009-00043.

North American Electric Reliability Corporation (NERC); *High-Impact, Low-Frequency Event Risk to the North American Bulk Power System A Jointly-Commissioned Summary Report of the North American Electric Reliability Corporation and the U.S. Department of Energy's November 2009 Workshop*; <http://www.nerc.com/files/HILF.pdf>

From: jean public [uscitizen1@live.com]
Sent: Saturday, June 26, 2010 12:32 PM
To: Campus EIS; americanvoices@mail.house.gov; jungaro@gannett.com; info@emagazine.com; information@sierraclub.org; info@starmagazine.com; comments@whitehouse.gov; sf.nancy@mail.house.gov; info@theteaparty.org
Cc:
Subject: public comment on federal register FW: stop spending this out of control spending on military enlargement - fort meade enlargement

JP-1: Comment noted. Thank you for your interest.

we want to get out of war, not keep growing and growing and growing for war. we dont want to spend more for war machines, no new buildings, use what you have. this spending plan is ludicrous. you must think the american taxpayer has a bottomless wallet, even in these times of recession depression. in addition the pollution at these military facilities is horrible. lejeune has poisoned hundreds of thousands of marines with water that was not safe to drink. we want to get back to a peaceful world NOT this focus on military overspending. this plan needs shut down. use the facilities available.
jean pbulic 15 elm st florham sprk nj07932

JP-1

[Federal Register: June 25, 2010 (Volume 75, Number 122)]
[Notices]
[Page 36371-36372]
From the Federal Register Online via GPO Access [www.access.gpo.gov]
[DOCID:fr25jn10-35]

DEPARTMENT OF DEFENSE

Office of the Secretary

Draft Environmental Impact Statement Addressing Campus
Development at Fort Meade, MD

AGENCY: Department of Defense (DoD).

ACTION: Notice of availability; notice of public meeting; request for
comments.

APPENDIX D

NOISE ANALYSIS CALCULATIONS

EIS Addressing Campus Development at Fort Meade, Maryland

Construction and Pile Driving Noise Distance Calculations

$$dB2 = dB1 - 10 * (a) \text{LOG}(R2/R1)$$

a=conventional drop-off rate coefficient, 2.0 for point source, no ground or atmospheric absorption

R1= distance of 50 feet

R2= distance to source

Cumulative noise level from grading, paving, and building construction (dB1) = 88.7 dB

Phase I

Residents of the Military Family Housing (MFH), approximately 350 feet north of construction

$$dB2 = dB1 - 10 * (2) \text{LOG}(350/50)$$

71.8 dBA

Persons accessing the Argonne Hills Chapel Center, approximately 750 feet northwest of construction

$$dB2 = dB1 - 10 * (2) \text{LOG}(750/50)$$

65.2 dBA

Persons accessing the MFH, approximately 800 feet east of construction

$$dB2 = dB1 - 10 * (2) \text{LOG}(800/50)$$

64.6 dBA

Persons accessing the Pershing Hills Elementary School, approximately 1,110 feet north of construction

$$dB2 = dB1 - 10 * (2) \text{LOG}(1110/50)$$

61.8 dBA

Persons accessing MacArthur Middle School, approximately 1,850 feet northeast of construction

$$dB2 = dB1 - 10 * (2) \text{LOG}(1850/50)$$

57.3 dBA

Persons accessing Manor View Elementary School, approximately 2,640 feet east of construction

$$dB2 = dB1 - 10 * (2) \text{LOG}(2640/50)$$

54.2 dBA

Persons accessing the NSA Campus off Canine Rd, approximately 3,100 feet west of construction

$$dB2 = dB1 - 10 * (2) \text{LOG}(3100/50)$$

52.9 dBA

Persons at the installation boundary, approximately 4,760 feet west of construction
 $dB2 = dB1 - 10 * (2) \text{LOG}(4760/50)$

49.1 dBA

Persons accessing the Patuxent Research Refuge, approximately 7,175 feet south of construction
 $dB2 = dB1 - 10 * (2) \text{LOG}(7175/50)$

45.6 dBA

Phase II

Persons accessing the NSA Campus off Canine Rd, approximately 1,730 feet west of construction
 $dB2 = dB1 - 10 * (2) \text{LOG}(1730/50)$

57.9 dBA

Persons at the installation boundary, approximately 3,420 feet west of construction
 $dB2 = dB1 - 10 * (2) \text{LOG}(3420/50)$

52.0 dBA

Persons accessing the Patuxent Research Refuge, approximately 6,770 feet south of construction
 $dB2 = dB1 - 10 * (2) \text{LOG}(6770/50)$

46.1 dBA

Phase III

Persons accessing the [black building] south of Mapes Road, approximately 1,780 feet south of construction
 $dB2 = dB1 - 10 * (2) \text{LOG}(1780/50)$

57.7 dBA

Persons at the installation boundary, approximately 3,850 feet west of construction
 $dB2 = dB1 - 10 * (2) \text{LOG}(3850/50)$

51.0 dBA

Persons accessing the Patuxent Research Refuge, approximately 5,630 feet south of construction
 $dB2 = dB1 - 10 * (2) \text{LOG}(5630/50)$

47.7 dBA

Noise level from pile driving (dB1) = 98.0 dB

Phase I

Residents of the MFH, approximately 350 feet north of pile driving activities

$$dB2 = dB1 - 10 * (2) \text{LOG}(350/50)$$

81.1 dBA

Persons accessing the Argonne Hills Chapel Center, approximately 750 feet northwest of pile driving activities

$$dB2 = dB1 - 10 * (2) \text{LOG}(750/50)$$

74.5 dBA

Persons accessing the MFH, approximately 800 feet east of pile driving activities

$$dB2 = dB1 - 10 * (2) \text{LOG}(800/50)$$

73.9 dBA

Persons accessing the Pershing Hills Elementary School, approximately 1,110 feet north of pile driving activities

$$dB2 = dB1 - 10 * (2) \text{LOG}(1110/50)$$

71.1 dBA

Persons accessing MacArthur Middle School, approximately 1,850 feet northeast of pile driving activities

$$dB2 = dB1 - 10 * (2) \text{LOG}(1850/50)$$

66.6 dBA

Persons accessing Manor View Elementary School, approximately 2,640 feet east of pile driving activities

$$dB2 = dB1 - 10 * (2) \text{LOG}(2640/50)$$

63.5 dBA

Persons accessing the NSA Campus off Canine Rd, approximately 3,100 feet west of pile driving activities

$$dB2 = dB1 - 10 * (2) \text{LOG}(3100/50)$$

62.2 dBA

Persons at the installation boundary, approximately 4,760 feet west of pile driving activities

$$dB2 = dB1 - 10 * (2) \text{LOG}(4760/50)$$

58.4 dBA

Persons accessing the Patuxent Research Refuge, approximately 7,175 feet south of pile driving activities
 $dB2 = dB1 - 10 * (2) \text{LOG}(7175/50)$

54.9 dBA

Phase II

Persons accessing the NSA Campus off Canine Rd, approximately 1,730 feet west of pile driving activities
 $dB2 = dB1 - 10 * (2) \text{LOG}(1730/50)$

67.2 dBA

Persons at the installation boundary, approximately 3,420 feet west of pile driving activities
 $dB2 = dB1 - 10 * (2) \text{LOG}(3420/50)$

61.3 dBA

Persons accessing the Patuxent Research Refuge, approximately 6,770 feet south of construction
 $dB2 = dB1 - 10 * (2) \text{LOG}(6770/50)$

55.4 dBA

Phase III

Persons accessing the Defense Information School (Building 6500) approximately 1,780 feet south of pile driving activities
 $dB2 = dB1 - 10 * (2) \text{LOG}(1780/50)$

67.0 dBA

Persons at the installation boundary, approximately 3,850 feet west of pile driving activities
 $dB2 = dB1 - 10 * (2) \text{LOG}(3850/50)$

60.3 dBA

Persons accessing the Patuxent Research Refuge, approximately 5,630 feet south of pile driving activities
 $dB2 = dB1 - 10 * (2) \text{LOG}(5630/50)$

57.0 dBA

Computation



Project Ft. Meade Campus Development EIS
Subject Noise Analysis - Diesel Generators
Task Summary Table

Computed ED
Checked TGC
Sheet 1

Date 9/2/2009
Date 9/2/2009
Of 3

Outdoor Noise Levels

Receptor	Predicted Noise Level SPL (dBA)
1 - Residential (MFH)	74
2 - School (Pershing Hill Elementary)	68
3 - Residential (MFH)	67
4 - Church (Argonne Hills Chapel Center)	65
5 - School (MacArthur Middle)	63
6 - Installation Boundary	55

Computation



Project	Ft. Meade Campus Development EIS	Computed	ED	Date	9/2/2009
Subject	Noise Analysis - Diesel Generators	Checked	TGC	Date	9/2/2009
Task	Noise Level @ Outdoor Receptors	Sheet	3	Of	3

1. Propagate Outdoor Noise Sources to Property Line Receptors

Propagate Outdoor Source's SPL to SPL at Property Line using the following equation:

$$SPL_2 = SPL_1 - 20 \log(D_2/D_1)$$

Receptor 1

Residential (MFH)

Source		SOUND Pressure Frequency (Hz)								Sum	A _{Barrier}	TOTAL	
		63	125	250	500	1000	2000	4000	8000				
Generators mechanical		65	84	83	79	76	76	74	75	88	25	63	dBA
Exhaust - with silencer		48	66	59	55	65	69	69	58	74	0	74	dBA
TOTAL ALL SOURCES		65	85	83	79	76	77	75	76			74	OVERALL TOTAL SPL (dBA)

Receptor 2

School (Pershing Hill Elementary)

Source		SOUND Pressure Frequency (Hz)								Sum	A _{Barrier}	TOTAL	
		63	125	250	500	1000	2000	4000	8000				
Generators mechanical		59	78	76	73	69	69	67	69	82	25	57	dBA
Exhaust - with silencer		42	60	52	49	58	62	62	52	67	0	67	dBA
TOTAL ALL SOURCES		59	78	76	73	69	70	68	69			68	OVERALL TOTAL SPL (dBA)

Receptor 3

Residential (MFH)

Source		SOUND Pressure Frequency (Hz)								Sum	A _{Barrier}	TOTAL	
		63	125	250	500	1000	2000	4000	8000				
Generators mechanical		58	77	75	72	68	68	66	68	81	25	56	dBA
Exhaust - with silencer		41	59	51	48	57	61	61	51	66	0	66	dBA
TOTAL ALL SOURCES		58	77	75	72	68	69	67	68			67	OVERALL TOTAL SPL (dBA)

Receptor 4

Church (Argonne Hills Chapel Center)

Source		SOUND Pressure Frequency (Hz)								Sum	A _{Barrier}	TOTAL	
		63	125	250	500	1000	2000	4000	8000				
Generators mechanical		56	75	74	70	66	66	64	66	79	25	54	dBA
Exhaust - with silencer		39	57	50	46	55	59	59	49	64	0	64	dBA
TOTAL ALL SOURCES		56	75	74	70	66	67	65	66			65	OVERALL TOTAL SPL (dBA)

Receptor 5

School (MacArthur Middle)

Source		SOUND Pressure Frequency (Hz)								Sum	A _{Barrier}	TOTAL	
		63	125	250	500	1000	2000	4000	8000				
Generators mechanical		54	73	72	68	64	64	62	64	77	25	52	dBA
Exhaust - with silencer		37	55	48	44	53	57	57	47	62	0	62	dBA
TOTAL ALL SOURCES		54	73	72	68	65	65	63	64			63	OVERALL TOTAL SPL (dBA)

Receptor 6

Installation Boundary

Source		SOUND Pressure Frequency (Hz)								Sum	A _{Barrier}	TOTAL	
		63	125	250	500	1000	2000	4000	8000				
Generators mechanical		46	66	64	60	57	57	55	57	70	25	45	dBA
Exhaust - with silencer		29	48	40	36	46	50	50	40	55	0	55	dBA
TOTAL ALL SOURCES		47	66	64	60	57	58	56	57			55	OVERALL TOTAL SPL (dBA)

Computation



Project Ft. Meade Campus Development EIS
Subject Noise Analysis - Combustion Turbine
Task Summary Table

Computed TGC

Date 8/28/2009

Outdoor Noise Levels

Receptor	Predicted Noise Level SPL (dBA)
1 - Residential (MFH)	42
2 - School (Pershing Hill Elementary)	36
3 - Residential (MFH)	35
4 - Church (Argonne Hills Chapel Center)	33
5 - School (MacArthur Middle)	31
6 - Installation Boundary	23

Computation



Project Ft. Meade Campus Development EIS Computed TGC Date 8/28/2009
 Subject Noise Analysis - Combustion Turbine
 Task Noise Level @ Outdoor Receptors

1. Propagate Outdoor Noise Sources to Property Line Receptors

Propagate Outdoor Source's SWL to SPL at Property Line using the following equation:

$$SPL = SWL - 20\log(r) - 0.6 \text{ Equation 2.7b Handbook of Noise Control, Harris (1979)}$$

Receptor 1

Residential (MFH)

Source	SOUND POWER Frequency (Hz)										Sum	A _{Barrier}	TOTAL	
	31	63	125	250	500	1000	2000	4000	8000					
85 MW combustion turbine	16	34	43	45	46	46	44	36	28	52	10	42	dBA	
TOTAL ALL SOURCES	17	34	43	45	46	46	44	36	28			42	OVERALL TOTAL SPL (d	

Receptor 2

School (Pershing Hill Elementary)

Source	SOUND POWER Frequency (Hz)										Sum	A _{Barrier}	TOTAL	
	31	63	125	250	500	1000	2000	4000	8000					
85 MW combustion turbine	9	28	36	39	40	39	37	29	21	46	10	36	dBA	
TOTAL ALL SOURCES	13	28	36	39	40	39	37	29	21			36	OVERALL TOTAL SPL (d	

Receptor 3

Residential (MFH)

Source	SOUND POWER Frequency (Hz)										Sum	A _{Barrier}	TOTAL	
	31	63	125	250	500	1000	2000	4000	8000					
85 MW combustion turbine	8	27	35	37	39	38	36	28	20	44	10	34	dBA	
TOTAL ALL SOURCES	12	27	35	37	39	38	36	28	20			35	OVERALL TOTAL SPL (d	

Receptor 4

Church (Argonne Hills Chapel Center)

Source	SOUND POWER Frequency (Hz)										Sum	A _{Barrier}	TOTAL	
	31	63	125	250	500	1000	2000	4000	8000					
85 MW combustion turbine	6	25	33	36	37	36	34	26	18	43	10	33	dBA	
TOTAL ALL SOURCES	12	25	33	36	37	36	34	26	19			33	OVERALL TOTAL SPL (d	

Receptor 5

School (MacArthur Middle)

Source		SOUND POWER Frequency (Hz)								Sum	A _{Barrier}	TOTAL		
		31	63	125	250	500	1000	2000	4000					8000
85 MW combustion turbine		4	23	31	34	35	34	33	24	16	41	10	31	dBA
TOTAL ALL SOURCES		11	23	31	34	35	34	33	24	17			31	OVERALL TOTAL SPL (d

Receptor 6

Installation Boundary

Source		SOUND POWER Frequency (Hz)								Sum	A _{Barrier}	TOTAL		
		31	63	125	250	500	1000	2000	4000					8000
85 MW combustion turbine		-3	16	24	26	28	27	25	17	9	33	10	23	dBA
TOTAL ALL SOURCES		10	17	24	26	28	27	25	18	12			23	OVERALL TOTAL SPL (d

APPENDIX E

AIR QUALITY CALCULATIONS

E.1 Emissions Estimations and Methodology

The Department of Defense (DOD) has considered net emissions generated from all direct and indirect sources of air emission that are reasonably foreseeable. *Direct emissions* are emissions that are caused or initiated by a Federal action and occur at the same time and place as the action. *Indirect emissions* are defined as reasonably foreseeable emissions that are caused by the action but might occur later in time and/or be farther removed in distance from the action itself, and that the Federal agency can practicably control. More specifically, project-related direct emissions would result from the following:

- *Demolition and construction activities:* The use of non-road equipment (e.g., bulldozers, backhoes), worker vehicles, the use of volatile organic compound (VOC) paints, paving off-gasses, and fugitive particles from surface disturbances
- *Operational activities:* Emergency generators and heating boilers not subject to major new source review, and the use of private motor vehicles

E.1.1 Demolition and Construction Emissions

Regardless of the sites ultimately chosen, estimated actual construction emissions would be similar. All direct and indirect emissions associated with the three phases of construction were estimated. The construction emissions were generated by estimating equipment use for utilities, site preparation, construction, and landscaping for the proposed facilities and storage tanks, including the following:

- Office Modules and Operations Center
- Module Interconnections
- Server Centers
- Electrical substation
- Generator plant (providing 60 MW of service)
- Chiller plant
- Boiler plant
- Ancillary parking
- Water storage tank
- Utility upgrades (water, gas, and communications services)
- Infrastructure upgrades (paving, walks, curbs, and gutters, storm water management).

Demolition and construction emissions associated with the use of construction equipment (e.g., bulldozers, backhoes), worker vehicles, the use of VOC paints, paving off-gasses, and fugitive particles from surface disturbances are presented in **Tables E-1 through E-3** for all the years of construction. This section also outlines all the calculations and assumptions made to derive these construction emission estimations. Construction activities during Phase I would be slightly more intense than the other two phases. Therefore, the highest annual level of construction emissions would take place in Phase I.

E.1.1.1 Heavy Construction Equipment

Pollutant emissions resulting from activities associated with constructing the proposed buildings, parking facilities, and roadways were estimated. The typical demolition and construction would involve such activities as demolition of existing buildings or structures, utility installation, road construction, site clearing and grading, building construction, and asphalt paving.

Table E-1. Estimated Construction Emissions - Phase I

Year	Construction Emissions (tpy)	
	NO _x	VOC
1	26.8	1.9
2	14.5	1.1
3	51.2	7.6
4	34.2	5.4
5	44.9	7.5
6	13.1	2.3
7	8.3	1.3
Construction Emissions – Year 1		
Heavy Equipment Emissions	26.7	1.8
Worker Trip Emissions	0.1	0.1
Total	26.8	1.9
Construction Emissions – Year 2		
Heavy Equipment Emissions	14.4	1.0
Worker Trip Emissions	0.1	0.1
Total	14.5	1.1
Construction Emissions – Year 3		
Heavy Equipment Emissions	49.7	4.5
Worker Trip Emissions	1.5	1.4
Architectural Coating Emissions	0.0	1.8
Total	51.2	7.6
Construction Emissions – Year 4		
Heavy Equipment Emissions	33.2	3.1
Worker Trip Emissions	1.1	1.0
Architectural Coating Emissions	0.0	1.3
Total	34.3	5.4
Construction Emissions – Year 5		
Heavy Equipment Emissions	43.4	4.3
Worker Trip Emissions	1.5	1.4
Architectural Coating Emissions	0.0	1.8
Total	44.9	7.5
Construction Emissions – Year 6		
Heavy Equipment Emissions	12.6	1.3
Worker Trip Emissions	0.5	0.4
Architectural Coating Emissions	0.0	0.6
Total	13.1	2.3
Construction Emissions – Year 7		
Heavy Equipment Emissions	8.0	0.8
Worker Trip Emissions	0.3	0.2
Architectural Coating Emissions	0.0	0.3
Total	8.3	1.3

Table E-2. Estimated Construction Emissions - Phase II

Year	Construction Emissions (tpy)	
	NO _x	VOC
1	19.8	1.4
2	5.3	0.4
3	36.9	5.5
4	24.5	3.8
5	29.0	4.7
Construction Emissions – Year 1		
Heavy Equipment Emissions	19.7	1.3
Worker Trip Emissions	0.1	0.1
Total	19.8	1.4
Construction Emissions – Year 2		
Heavy Equipment Emissions	5.3	0.4
Worker Trip Emissions	0.0	0.0
Total	5.3	0.4
Construction Emissions – Year 3		
Heavy Equipment Emissions	35.8	3.2
Worker Trip Emissions	1.1	1.0
Architectural Coating Emissions	0.0	1.3
Total	36.9	5.5
Construction Emissions – Year 4		
Heavy Equipment Emissions	23.7	2.2
Worker Trip Emissions	0.8	0.7
Architectural Coating Emissions	0.0	0.9
Total	24.5	3.8
Construction Emissions – Year 5		
Heavy Equipment Emissions	28.1	2.8
Worker Trip Emissions	0.9	0.9
Architectural Coating Emissions	0.0	1.1
Total	29.0	4.8

Demolition and construction would involve the use of various non-road equipment, power generators, and trucks. Pieces of equipment to be used for building construction include, but are not limited to, backhoes, loaders, excavators, air compressors, chain saws, chipping machines, dozers, cranes, pavers, graders, rollers, and heavy trucks. Information regarding the number of pieces and types of construction equipment to be used on the project, the schedule for deployment of equipment (monthly and annually), and the approximate daily operating time (including power level or usage factor) were estimated for each individual construction project based on a schedule of construction activity.

Emissions from construction activities were estimated based on the projected construction activity schedule, the number of vehicles/pieces of equipment, and vehicle/equipment utilization rates. Emission factors for heavy-duty diesel equipment were obtained from EPA's *NONROAD2005 Emissions Model* (USEPA 2005). The equipment and vehicle operation hours were estimated based on R.S.Means' *Building Cost Construction Data*, 64th annual edition (Waier 2006), and field experience from similar projects.

Table E-3. Estimated Construction Emissions - Phase III

Year	Construction Emissions (tpy)	
	NO _x	VOC
1	22.4	1.6
2	22.4	1.7
3	34.9	5.2
4	28.2	4.4
5	29.8	5.0
6	29.3	5.2
7	27.4	4.9
8	29.8	5.1
Construction Emissions – Year 1		
Heavy Equipment Emissions	22.3	1.5
Worker Trip Emissions	0.1	0.1
Fugitive Dust Emissions	0.0	0.0
Total	22.4	1.6
Construction Emissions – Year 2		
Heavy Equipment Emissions	22.3	1.6
Worker Trip Emissions	0.1	0.1
Fugitive Dust Emissions	0.0	0.0
Total	22.4	1.7
Construction Emissions – Year 3		
Heavy Equipment Emissions	33.9	3.0
Worker Trip Emissions	1.0	0.9
Architectural Coating Emissions	0.0	1.2
Total	34.9	5.1
Construction Emissions – Year 4		
Heavy Equipment Emissions	27.3	2.6
Worker Trip Emissions	0.9	0.8
Architectural Coating Emissions	0.0	1.1
Total	28.2	4.5
Construction Emissions – Year 5		
Heavy Equipment Emissions	28.8	2.9
Worker Trip Emissions	1.0	0.9
Architectural Coating Emissions	0.0	1.2
Total	29.8	5.0
Construction Emissions – Year 6		
Heavy Equipment Emissions	28.3	2.9
Worker Trip Emissions	1.1	1.0
Architectural Coating Emissions	0.0	1.3
Total	29.4	5.2
Construction Emissions – Year 7		
Heavy Equipment Emissions	26.4	2.7
Worker Trip Emissions	1.0	0.9
Architectural Coating Emissions	0.0	1.2
Total	27.4	4.8
Construction Emissions – Year 8		
Heavy Equipment Emissions	28.8	2.9
Worker Trip Emissions	1.0	1.0
Architectural Coating Emissions	0.0	1.2
Total	29.8	5.1

Emission factors in grams of pollutant per hour were multiplied by the estimated running time to calculate total grams of pollutant from each piece of equipment. Finally, total grams of pollutant were converted to tons of pollutant. The following formula was used to calculate hourly emissions from non-road engine sources, including cranes, backhoes, and the like:

$$M_i = (N \times EF_i)$$

where: M_i = mass of emissions of i^{th} pollutant during inventory period

N = source population (units)

EF_i = average emissions of i^{th} pollutant per unit of use (e.g., grams per hour)

The total annual emissions levels are summarized in **Table E-4**.

Table E-4. Annual Emissions from Construction and Demolition Equipment

Year*	Annual emissions (tpy)					
	Phase I		Phase II		Phase III	
	NO _x	VOC	NO _x	VOC	NO _x	VOC
1	26.7	1.8	19.7	1.3	22.3	1.5
2	14.4	1.0	5.3	0.4	22.3	1.6
3	49.7	4.5	35.8	3.2	33.9	3.1
4	33.2	3.1	23.7	2.2	27.3	2.6
5	43.4	4.3	28.1	2.8	28.8	2.9
6	12.6	1.3	-	-	28.3	2.9
7	8.0	0.8	-	-	26.4	2.7
8	-	-	-	-	28.8	2.9

Sources: SCAQMD 1993, USEPA 1995

Note: * Represents years from the beginning of each phase.

E.1.1.2 Construction Worker Vehicle Operations

Emissions due to construction worker vehicle use were included in the analysis. Emission factors for motor vehicles were conservatively calculated using the EPA *MOBILE6.2*. These emission factors were then multiplied by the vehicle operational hours to determine motor vehicle emissions. The analysis assumed conservatively that the worker's vehicle would drive 30 miles per day at an average speed of 35 miles per hour. The total annual emissions levels are summarized in **Table E-5**.

Table E-5. Estimated Annual Emissions from Construction Worker Vehicles

Year*	Annual Emissions (tpy)					
	Phase I		Phase II		Phase III	
	NO _x	VOC	NO _x	VOC	NO _x	VOC
1	0.1	0.1	0.1	0.1	0.1	0.1
2	0.1	0.1	0.0	0.0	0.1	0.1
3	1.5	1.4	1.1	1.0	1.0	0.9
4	1.1	1.0	0.8	0.7	0.9	0.8
5	1.5	1.4	0.9	0.9	1.0	0.9
6	0.5	0.4	-	-	1.1	1.0
7	0.3	0.2	-	-	1.0	0.9
8	-	-	-	-	1.0	1.0

Sources: SCAQMD 1993, USEPA 2003

Note: * Represents years from the beginning of each phase.

E.1.1.3 Emissions from Architectural Coatings

Emission factors relating emissions to total square footage to be built were used to estimate VOC emissions from architectural coating activities— primarily painting activities. For office space, the area to be painted was assumed to be approximately twice the heated area of the facility, and the dry film thickness was assumed to be 3 millimeters (mm). The following formula was used to calculate emissions from the painting of the facilities:

$$E = [(F \times G) / 1000] \times H$$

where: E = emissions of VOCs from architectural coatings

F = pounds of VOC emissions per gallon

G = total area to be coated (floor area \times 2)

H = paint coverage.

A sample calculation for architectural coating VOC emissions during construction of an example facility is provided as follows:

$$\text{Floor area} = 100,000 \text{ ft}^2$$

$$E = [(0.83 \text{ [lb/gallon]} / 400 \text{ [ft}^2\text{/gallon]} \times [(100,000 \text{ [ft}^2] \times 2)] / 2,000 \text{ [lb/ton]}]$$

$$= 0.208 \text{ tons}$$

The total annual emissions levels are summarized in **Table E-6**. In addition, estimated emissions from the potential demolition and construction are presented in **Appendix E.2**.

Table E-6. Annual VOC Emissions from Architectural Coatings

Year*	Annual VOC Emissions (tpy)		
	Phase I	Phase III	Phase III
3	1.8	1.3	1.2
4	1.3	0.9	1.1
5	1.8	1.1	1.2
6	0.6	-	1.3
7	0.3	-	1.2
8	-	-	1.2

Sources: SCAQMD 1993, COMAR 26.11.35

Note: * Represents years from the beginning of each phase.

E.1.1.4 Asphalt Curing Emissions

Asphalt paving would generate emissions from (1) asphalt curing, (2) operation of onsite paving equipment, and (3) operation of motor vehicles, including paving material delivery trucks and worker commuting vehicles. Because the emissions resulting from the operation of onsite paving equipment, trucks, and vehicles were included in the previous section, only asphalt curing-related emissions are discussed in this section. Asphalt curing-related VOC emissions were calculated based on the amount of paving for the onsite parking lot and proposed roadways. The following assumption was used in VOC emission calculations for asphalt curing (SCAQMD 1993):

$$E = \text{area paved} \times 2.62 \text{ lb VOC/acre}$$

A sample calculation is provided as follows:

$$\text{Paved area} = 100 \text{ acres}$$

$$\begin{aligned} E &= 100 \text{ acres} \times 2.62 \text{ lb VOC/acre} / 2,000 \text{ lb/ton} \\ &= 0.131 \text{ ton} \end{aligned}$$

Due to the minimal paving anticipated for all alternatives, negligible off gas emissions are anticipated.

E.1.2 Operational Emissions

Operational emissions occur as a result of the operation (heating boilers and emergency generators) of the proposed facilities. The total annual operational emissions levels are summarized in **Table E-7**. It is expected that these emissions would occur immediately after the completion of each Phase. Notably, the fuel usage for the proposed boilers was based on the existing campus, and emissions due to heating of facilities were broken down by phase based on the heated floor area. It is expected that the new buildings will make more efficient use of the heat than existing buildings, and emissions would be somewhat less than those described herein. In addition, emissions due to new commuters were calculated using the same procedure for construction workers. The vast majority of personnel that would occupy the new facilities currently work at Fort Meade or NSA, or live within the Baltimore region. It is expected that 250 new employees for Phase I, 200 new employees for Phase II, and 200 new employees for Phase III, would come from outside the Baltimore AQCR. Conservatively, emission factors for the current year were used for all phases. It is expected that the total commuter emissions would be somewhat less than those described herein.

Table E-7. Roll-up of Operational Emissions

	NO_x	VOC
Boiler Emissions		
Phase I (33%)	3.3	0.4
Phase I+II (54%)	5.3	0.6
All Phases (100%)	9.9	1.2
Generator Emissions		
Phase I	5.4	0.7
Worker Commuting Emissions		
Phase I	0.6	0.7
Phase I+II	1.1	1.2
All Phases	1.6	1.8
Total Operational Emissions		
Phase I	9.3	1.8
Phase I+II	11.8	2.6
All Phases	16.9	3.7

E.2 Emission Calculations

Table E-8. Project Areas and Durations – Phase I

Project Name	Year	Clearing Area (Acres)	Building Area (ft ²)	Paving (Acres)	Days of Clearing	Days of Building	Days of Paving
Demolition	1	0.74	0	0	230	0	0
Road Improvements, Grading	1	4.82	0	0	230	0	0
Office Modules, Grading	1	39.74	0	0	230	0	0
Module Interconnections, Grading	1	0.92	0	0	230	0	0
Demolition	2	0.74	0	0	230	0	0
Road Improvements, Paving	2	0	0	4.82	0	0	230
Server Center, Clearing and Grading	2	7.48	0	0	230	0	0
Substations, Clearing and Grading	2	3.2	0	0	230	0	0
Chiller Plant, Clearing and Grading	2	3.2	0	0	230	0	0
Boiler Plant, Clearing and Grading	2	3.2	0	0	230	0	0
Water Tank, Clearing and Grading	2	0.23	0	0	230	0	0
Parking Garage, Clearing and Grading	2	5.34	0	0	230	0	0
Utility Upgrades, Clearing and Grading	2	1.22	0	0	230	0	0
Office Modules, Construction	3	0	576,000	0	0	230	0
Chiller Plant, Construction	3	0	139,000	0	0	230	0
Boiler Plant, Construction	3	0	139,000	0	0	230	0
Office Modules, Construction	4	0	576,000	0	0	230	0
Module Interconnections, Construction	4	0	40,000	0	0	230	0
Office Modules, Construction	5	0	576,000	0	0	230	0
Substations, Construction	5	0.46	0	0	113.42	0	0
Server Center, Construction	5	0	0	1.15	0	0	18.9
Parking Garage, Construction	6	0.83	0	0	230	0	0
Server Center, Construction	6	0	12,000	0	0	230	0
Parking Garage, Construction	7	0	6,000	0	0	113.42	0
Water Tank, Construction	7	0.46	0	0	113.42	0	0
Surface Parking, Paving	7	0	0	1.15	0	0	18.9

Table E-9. Heavy Equipment Emissions – Phase I

Project	NO_x (tons)	VOC (tons)
Demolition (Year 1)	0.43	0.03
Road Improvements, C&G (Year 1)	2.78	0.19
Office Modules, C&G (Year 1)	22.93	1.55
Module Interconnections, C&G (Year 1)	0.53	0.04
Demolition (Year 2)	0.39	0.03
Road Improvements, Paving (Year 2)	1.44	0.10
Server Center, C&G (Year 2)	3.94	0.28
Substations, C&G (Year 2)	1.68	0.12
Chiller Plant, C&G (Year 2)	1.68	0.12
Boiler Plant, C&G (Year 2)	1.68	0.12
Water Tank, C&G (Year 2)	0.12	0.01
Parking Garage, C&G (Year 2)	2.81	0.20
Utility Upgrades, C&G (Year 2)	0.64	0.04
Office Modules, Construction (Year 3)	33.51	3.01
Chiller Plant, Construction (Year 3)	8.09	0.73
Boiler Plant, Construction (Year 3)	8.09	0.73
Office Modules, Construction (Year 4)	31.01	2.92
Module Interconnections, Construction (Year 4)	2.15	0.20
Office Modules, Construction (Year 5)	28.45	2.84
Substations, Construction (Year 5)	6.87	0.69
Server Center, Construction (Year 5)	8.03	0.80
Parking Garage, Construction (Year 6)	5.26	0.55
Server Center, Construction (Year 6)	7.38	0.77
Parking Garage, Construction (Year 7)	5.26	0.55
Water Tank, Construction (Year 7)	0.45	0.05
Surface Parking, Paving (Year 7)	2.32	0.20

Sources: SCAQMD 1993, USEPA 1995

Table E-10. Construction Worker Trip Emissions (tons) – Phase I

Project	VMT	EFNO_x (g/mile)	NO_x (tons)	EFVOC (g/mile)	VOC (tons)
Year 1					
Demolition	6,412	0.32	0	0.29	0
Road Improvements	41,575	0.32	0.01	0.29	0.01
Office Modules, C&G	342,792	0.32	0.12	0.29	0.11
Module Interconnections	7,935	0.32	0	0.29	0
Year 2					
Demolition	6,412	0.32	0	0.29	0
Road Improvements, Paving	41,575	0.32	0.01	0.29	0.01
Server Center, C&G	64,512	0.32	0.02	0.29	0.02
Substations, C&G	27,574	0.32	0.01	0.29	0.01
Chiller Plant, C&G	27,574	0.32	0.01	0.29	0.01
Boiler Plant, C&G	27,574	0.32	0.01	0.29	0.01
Water Tank, C&G	1,984	0.32	0	0.29	0
Parking Garage, C&G	46,023	0.32	0.02	0.29	0.01
Utility Upgrades, C&G	10,524	0.32	0	0.29	0
Year 3					
Office Modules, Construction	2,861,568	0.32	0.99	0.29	0.91
Chiller Plant, Construction	690,552	0.32	0.24	0.29	0.22
Boiler Plant, Construction	690,552	0.32	0.24	0.29	0.22
Year 4					
Office Modules, Construction	2,861,568	0.32	0.99	0.29	0.91
Module Interconnections, Construction	198,720	0.32	0.07	0.29	0.06
Year 5					
Office Modules, Construction	2,861,568	0.32	0.99	0.29	0.91
Substations, Construction	690,552	0.32	0.24	0.29	0.22
Server Center, Construction	807,797	0.32	0.28	0.29	0.26
Year 6					
Parking Garage, Construction	576,288	0.32	0.2	0.29	0.18
Server Center, Construction	807,797	0.32	0.28	0.29	0.26
Year 7					
Parking Garage, Construction	576,288	0.32	0.2	0.29	0.18
Water Tank, Construction	49,680	0.32	0.02	0.29	0.02
Surface Parking, Paving	99,188	0.32	0.03	0.29	0.03

Table E-11. Architectural Coating Emissions (Paint) – Phase I

Project	Floor Area	Wall Surface	EFVOC (lbs/1,000 ft ²)	VOC (tons)
Office Modules, Construction (Year 3)	576,000	1,152,000	55.5	1.2
Chiller Plant, Construction (Year 3)	139,000	278,000	55.5	0.29
Boiler Plant, Construction (Year 3)	139,000	278,000	55.5	0.29
Office Modules, Construction (Year 4)	576,000	1,152,000	55.5	1.2
Module Interconnections, Construction (Year 4)	40,000	80,000	55.5	0.08
Office Modules, Construction (Year 5)	576,000	1,152,000	55.5	1.2
Substations, Construction (Year 5)	139,000	278,000	55.5	0.29
Server Center, Construction (Year 5)	162,600	325,200	55.5	0.34
Parking Garage, Construction (Year 6)	116,000	232,000	55.5	0.24
Server Center, Construction (Year 6)	162,600	325,200	55.5	0.34
Parking Garage, Construction (Year 7)	116,000	232,000	55.5	0.24
Water Tank, Construction (Year 7)	10,000	20,000	55.5	0.02

Sources: SCAQMD 1993, COMAR 26.11.35

Table E-12. Project Areas and Durations – Phase II

Project Name	Year	Clearing Area (Acres)	Building Area (ft ²)	Paving (Acres)	Days of Clearing	Days of Building	Days of Paving
Demolition	1	0.74	0	0	230	0	0
Road Improvements, Clearing and Grading	1	4.82	0	0	230	0	0
Office Modules, Clearing and Grading	1	27.6	0	0	230	0	0
Module Interconnections, Clearing and Grading	1	0.92	0	0	230	0	0
Demolition	2	0.74	0	0	230	0	0
Road Improvements, Paving	2	0	0	4.82	0	0	230
Parking Garage, Clearing and Grading	2	5.34	0	0	230	0	0
Utility Upgrades, Clearing and Grading	2	1.22	0	0	230	0	0
Office Modules, Construction	3	0	400,000	0	0	230	0
CDC, Construction	3	0	100,000	0	0	230	0
Parking Garage, Construction	3	0	116,000	0	0	230	0
Office Modules, Construction	4	0	400,000	0	0	230	0
Module Interconnections, Construction	4	0	40,000	0	0	230	0
Office Modules, Construction	5	0	400,000	0	0	230	0
Parking Garage, Construction	5	0	116,000	0	0	230	0
Surface Parking, Paving	5	0	0	11.5	0	0	230
CDC, Construction	3	0	100,000	0	0	230	0

Table E-13. Heavy Equipment Emissions – Phase II

Project	NO_x (tons)	VOC (tons)
Demolition (Year 1)	0.43	0.03
Road Improvements, Clearing and Grading (Year 1)	2.78	0.19
Office Modules, Clearing and Grading (Year 1)	15.92	1.08
Module Interconnections, Clearing and Grading (Year 1)	0.53	0.04
Demolition (Year 2)	0.39	0.03
Road Improvements, Paving (Year 2)	1.44	0.10
Parking Garage, Clearing and Grading (Year 2)	2.81	0.20
Utility Upgrades, Clearing and Grading (Year 2)	0.64	0.04
Office Modules, Construction (Year 3)	23.27	2.09
CDC, Construction (Year 3)	5.82	0.52
Parking Garage, Construction (Year 3)	6.75	0.61
Office Modules, Construction (Year 4)	21.54	2.02
Module Interconnections, Construction (Year 4)	2.15	0.20
Office Modules, Construction (Year 5)	19.76	1.97
Parking Garage, Construction (Year 5)	5.73	0.57
Surface Parking, Paving (Year 5)	2.58	0.21

Sources: SCAQMD 1993, USEPA 1995

Table E-14. Architectural Coating Emissions (Paint) – Phase II

Project	Floor Area	Wall Surface	EFVOC (lbs/1,000 ft²)	VOC (tons)
Office Modules, Construction(Year 3)	400,000	800,000	55.5	0.83
CDC, Construction(Year 3)	100,000	200,000	55.5	0.21
Parking Garage, Construction(Year 3)	116,000	232,000	55.5	0.24
Office Modules, Construction(Year 4)	400,000	800,000	55.5	0.83
Module Interconnections, Construction(Year 4)	40,000	80,000	55.5	0.08
Office Modules, Construction(Year 5)	400,000	800,000	55.5	0.83
Parking Garage, Construction(Year 5)	116,000	232,000	55.5	0.24

Sources: SCAQMD 1993, COMAR 26.11.35

Table E-15. Construction Worker Trip Emissions (tons) – Phase II

Project	VMT	EFNO_x (g/mile)	NO_x (tons)	EFVOC (g/mile)	VOC (tons)
Year 1					
Demolition	6,412	0.32	0	0.29	0
Road Improvements	41,575	0.32	0.01	0.29	0.01
Office Modules, C&G	238,050	0.32	0.08	0.29	0.08
Module Interconnections	7,935	0.32	0	0.29	0
Year 2					
Demolition	6,412	0.32	0	0.29	0
Road Improvements, Paving	41,575	0.32	0.01	0.29	0.01
Parking Garage, Clearing and Grading	46,023	0.32	0.02	0.29	0.01
Utility Upgrades, Clearing and Grading	10,524	0.32	0	0.29	0
Year 3					
Office Modules, Construction	1,987,200	0.32	0.69	0.29	0.64
CDC, Construction	496,800	0.32	0.17	0.29	0.16
Parking Garage, Construction	576,288	0.32	0.2	0.29	0.18
Year 4					
Office Modules, Construction	1,987,200	0.32	0.69	0.29	0.64
Module Interconnections, Construction	198,720	0.32	0.07	0.29	0.06
Year 5					
Office Modules, Construction	1,987,200	0.32	0.69	0.29	0.64
Parking Garage, Construction	576,288	0.32	0.2	0.29	0.18
Surface Parking, Paving	99,188	0.32	0.03	0.29	0.03

Table E-16. Project Areas and Durations – Phase III

Project Name	Year	Clearing Area (Acres)	Building Area (ft²)	Paving (Acres)	Days of Clearing	Days of Building	Days of Paving
Demolition	1	0.74	0	0	230	0	0
Road Improvements, Clearing and Grading	1	4.82	0	0	230	0	0
Office Modules, Clearing and Grading	1	32.2	0	0	230	0	0
Module Interconnections, Clearing and Grading)	1	0.92	0	0	230	0	0
Demolition	2	0.74	0	0	230	0	0
Office Modules, Clearing and Grading	2	32.2	0	0	230	0	0
Road Improvements, Paving	2	0	0	4.82	0	0	230
Parking Garage, Clearing and Grading	2	5.34	0	0	230	0	0
Utility Upgrades, Clearing and Grading	2	1.22	0	0	230	0	0
Office Modules, Construction	3	0	466,666	0	0	230	0
Parking Garage, Construction	3	0	116,000	0	0	230	0
Office Modules, Construction	4	0	466,666	0	0	230	0
Module Interconnections, Construction	4	0	40,000	0	0	230	0
Office Modules, Construction	5	0	466,666	0	0	230	0
Parking Garage, Construction	5	0	116,000	0	0	230	0
Office Modules, Construction	6	0	466,666	0	0	230	0
Parking Garage, Construction	6	0	116,000	0	0	230	0
Module Interconnections, Construction	6	0	40,000	0	0	230	0
Office Modules, Construction	7	0	466,666	0	0	230	0
Parking Garage, Construction	7	0	116,000	0	0	230	0
Office Modules, Construction	8	0	466,666	0	0	230	0
Parking Garage, Construction	8	0	116,000	0	0	230	0
Surface Parking, Paving	8	0	0	11.5	0	0	230

Table E-17. Heavy Equipment Emissions – Phase III

Project	NO_x (tons)	VOC (tons)
Demolition (Year 1)	0.43	0.03
Road Improvements, Clearing and Grading (Year 1)	2.78	0.19
Office Modules, Clearing and Grading (Year 1)	18.58	1.26
Module Interconnections, Clearing and Grading (Year 1)	0.53	0.04
Demolition (Year 2)	0.39	0.03
Office Modules, Clearing and Grading (Year 2)	16.96	1.19
Road Improvements, Paving (Year 2)	1.44	0.10
Parking Garage, Clearing and Grading (Year 2)	2.81	0.20
Utility Upgrades, Clearing and Grading (Year 2)	0.64	0.04
Office Modules, Construction (Year 3)	27.15	2.44
Parking Garage, Construction (Year 3)	6.75	0.61
Office Modules, Construction (Year 4)	25.13	2.36
Module Interconnections, Construction (Year 4)	2.15	0.20
Office Modules, Construction (Year 5)	23.05	2.30
Parking Garage, Construction (Year 5)	5.73	0.57
Office Modules, Construction (Year 6)	21.17	2.20
Parking Garage, Construction (Year 6)	5.26	0.55
Module Interconnections, Construction (Year 6)	1.81	0.19
Office Modules, Construction (Year 7)	21.17	2.20
Parking Garage, Construction (Year 7)	5.26	0.55
Office Modules, Construction (Year 8)	21.17	2.20
Parking Garage, Construction (Year 8)	5.26	0.55
Surface Parking, Paving (Year 8)	2.32	0.20

Sources: SCAQMD 1993, USEPA 1995

Table E-18. Construction Worker Trip Emissions (tons) – Phase III

Project	VMT	EFNO_x (g/mile)	NO_x (tons)	EFVOC (g/mile)	VOC (tons)
Year 1					
Demolition	6,412	0.32	0	0.29	0
Road Improvements	41,575	0.32	0.01	0.29	0.01
Office Modules, C&G	277,725	0.32	0.1	0.29	0.09
Module Interconnections	7,935	0.32	0	0.29	0
Year 2					
Demolition	6,412	0.32	0	0.29	0
Office Modules, C&G	277,725	0.32	0.1	0.29	0.09
Road Improvements	41,575	0.32	0.01	0.29	0.01
Parking Garage, C&G	46,023	0.32	0.02	0.29	0.01
Utility Upgrades, C&G	10,524	0.32	0	0.29	0
Year 3					
Office Modules, Construction	2,318,397	0.32	0.81	0.29	0.74
Parking Garage, Construction	576,288	0.32	0.2	0.29	0.18
Year 4					
Office Modules, Construction	2,318,397	0.32	0.81	0.29	0.74
Module Interconnections, Construction	198,720	0.32	0.07	0.29	0.06
Year 5					
Office Modules, Construction	2,318,397	0.32	0.81	0.29	0.74
Parking Garage, Construction	576,288	0.32	0.2	0.29	0.18
Year 6					
Office Modules, Construction	2,318,397	0.32	0.81	0.29	0.74
Parking Garage, Construction	576,288	0.32	0.2	0.29	0.18
Module Interconnections, Construction	198,720	0.32	0.07	0.29	0.06
Year 7					
Office Modules, Construction	2,318,397	0.32	0.81	0.29	0.74
Parking Garage, Construction	576,288	0.32	0.2	0.29	0.18
Year 8					
Office Modules, Construction	2,318,397	0.32	0.81	0.29	0.74
Parking Garage, Construction	576,288	0.32	0.2	0.29	0.18
Surface Parking, Paving	99,188	0.32	0.03	0.29	0.03

Table E-19. Architectural Coating Emissions (Paint) – Phase III

Project	Floor Area	Wall Surface	EFVOC (lbs/1,000 ft ²)	VOC (tons)
Office Modules, Construction(Year 3)	466,666	933,332	55.5	0.97
Parking Garage, Construction(Year 3)	116,000	232,000	55.5	0.24
Office Modules, Construction(Year 4)	466,666	933,332	55.5	0.97
Module Interconnections, Construction(Year 4)	40,000	80,000	55.5	0.08
Office Modules, Construction(Year 5)	466,666	933,332	55.5	0.97
Parking Garage, Construction(Year 5)	116,000	232,000	55.5	0.24
Office Modules, Construction(Year 6)	466,666	933,332	55.5	0.97
Parking Garage, Construction(Year 6)	116,000	232,000	55.5	0.24
Module Interconnections, Construction(Year 6)	40,000	80,000	55.5	0.08
Office Modules, Construction(Year 7)	466,666	933,332	55.5	0.97
Parking Garage, Construction(Year 7)	116,000	232,000	55.5	0.24
Office Modules, Construction(Year 8)	466,666	933,332	55.5	0.97
Parking Garage, Construction(Year 8)	116,000	232,000	55.5	0.24

Sources: SCAQMD 1993, COMAR 26.11.35

Table E-20. Generator Information – Phase I

Generator Size	2,500	kW
Generator Size	3,353	hp
Maximum Hours of Operation (PTE)	100	Hours
Actual Hours of Operation (PTE)	80	Hours

Table E-21. Manufacturer Nominal Emission Rates

CAT2500 Tier 2	(g/hpxhr)
NO _x	5.05
CO	0.41
VOC	0.1
PM	0.036
SO _x ^a	0.2
HAP ^b	0.0121

Notes:

- a. Source: USAF 1999, Assumes sulfur content (S) = 0.05 wt%
- b. Source: USEPA 1995

Table E-22. Generator Potential to Emit and Estimated Actual Emissions – Phase I

Source	Total Capacity	Number of Generators	Potential to Emit (tpy)*				
	(kW)	(units)	NO _x	CO	VOC	PM	SO _x
Potential to Emit - No Controls							
Proposed Generator Plant	60,000	24	44.8	3.6	0.9	0.3	1.8
Potential to Emit – Selective Catalytic Reduction (SCR Efficiency: 85%)							
Proposed Generator Plant			6.7	3.6	0.9	0.3	1.8
Estimated Actual Emissions – Selective Catalytic Reduction (SCR Efficiency: 85%)							
Proposed Generator Plant			5.4	2.9	0.7	0.3	1.4

Note: * Estimated actual HAP emissions = 0.09 tpy

Table E-23. General Boiler Information

Number of Boilers	4	Units
Boiler Capacity	98,000,000	Btu/hr
Total Heat Input	392,000,000	Btu/hr
Heat Content for Natural Gas	1,020	Btu/cf
Heat Content for No. 2 Fuel Oil	140,000	Btu/gal
Day Using Oil	30	days
Natural Gas Consumption		
Total Hours	8,040	hours
Total Heat	3.15E+12	Btu
Total Volume	3,089,882,353	cf
Fuel Oil Consumption		
Total Hours	720	hours
Total Heat	2.82E+11	Btu
Total Volume	2,016,000	gallons

Table E-24. Boiler Emission Factors

Low NO _x Emission Factors		
	Low NO _x Boilers	
	(30 ppm)	(20 ppm)
Natural Gas NO _x (ppm)	30	20
Emission Factor (lb/10 ⁶ cf)	36	24

AP-42 Emission Factors						
	NO _x	CO	VOC	PM ₁₀	PM _{2.5}	SO _x
Natural Gas (lb/10 ⁶ cf) ^a	190	84	5.5	7.6	7.6	0.6
Number 2 Fuel Oil (lb/10 ³ gal) ^b	20	5	0.556	1	0.25	7.05

Source: USEPA 1995

Notes:

- a. Natural gas emission factors for all pollutants except NO_x were obtained from U.S. EPA's AP-42, Section 1.4.
For low NO_x burners assumed lb/MMBtu = ppm / 850.
- b. No. 2 fuel oil emission factors for all pollutants were obtained from U.S. EPA's AP-42, Section 1.3.
Sulfur content = 0.05 wt%.

Table E-25. Boiler Potential to Emit

	Potential to Emit (tpy)					
	NO _x	CO	VOC	PM ₁₀	PM _{2.5}	SO _x
Natural Gas						
Potential Consumption: 3,089,882,353 (cf/yr)						
Boilers - Uncontrolled	293.54	129.78	8.50	11.74	11.74	0.93
Boilers - Low NO _x (30ppm)	55.62	129.78	8.50	11.74	11.74	0.93
Boilers - Low NO _x (20ppm)	37.08	129.78	8.50	11.74	11.74	0.93
No. 2 Fuel Oil						
Potential Consumption: 2,016,000 (gal/yr)						
Boilers - Uncontrolled	20.16	5.04	0.56	1.01	0.25	7.11
Potential to Emit - No Controls						
Boilers - Uncontrolled	313.70	134.82	9.06	12.75	11.99	8.03
Boilers - Low NO _x (30ppm)	75.78	134.82	9.06	12.75	11.99	8.03
Boilers - Low NO _x (20ppm)	57.24	134.82	9.06	12.75	11.99	8.03
Potential to Emit - Selective Catalytic Reduction (SCR)						
SCR Efficiency: 85%						
Boilers - Uncontrolled	47.05	134.82	9.06	12.75	11.99	8.03
Boilers - Low NO _x (30ppm)	11.37	134.82	9.06	12.75	11.99	8.03
Boilers - Low NO _x (20ppm)	8.59	134.82	9.06	12.75	11.99	8.03

Sources: USEPA 1995, USAF 1999

Table E-26. Boiler Estimated Actual Emissions

	Estimated Actual Emissions (tpy)					
	NO _x	CO	VOC	PM ₁₀	PM _{2.5}	SO _x
Natural Gas						
Estimated Consumption: 393,366,353 (cf/yr)						
Boilers - Uncontrolled	37.37	16.52	1.08	1.49	1.49	0.12
Boilers - Low NO _x (30ppm)	7.08	16.52	1.08	1.49	1.49	0.12
Boilers - Low NO _x (20ppm)	4.72	16.52	1.08	1.49	1.49	0.12
No. 2 Fuel Oil						
Estimated Consumption: 284,353 (gal/yr)						
Boilers - Uncontrolled	2.84	0.71	0.08	0.14	0.04	1.00
Estimated Actual Emissions - No Additional Controls						
Boilers - Uncontrolled	40.21	17.23	1.16	1.64	1.53	1.12
Boilers - Low NO _x (30ppm)	9.92	17.23	1.16	1.64	1.53	1.12
Boilers - Low NO _x (20ppm)	7.56	17.23	1.16	1.64	1.53	1.12
Estimated Actual Emissions - Selective Catalytic Reduction (SCR)						
SCR Efficiency: 85%						
Boilers - Uncontrolled	6.03	2.58	0.17	0.25	0.23	0.17
Boilers - Low NO _x (30ppm)	1.49	2.58	0.17	0.25	0.23	0.17
Boilers - Low NO _x (20ppm)	1.13	2.58	0.17	0.25	0.23	0.17

Sources: USEPA 1995, USAF 1999

Table E-27. Worker Commuting Emissions – New From Outside Baltimore Region

	Phase I	Phase II	Phase III
Number of Workers	250	200	200
Total Miles *	960,000	768,000	768,000
Pollutant	NO_x	VOC	
Emission Factor (g/mile)	0.59	0.65	
Cumulative Emissions (tons) – Phase I	0.6	0.7	
Cumulative Emissions (tons) – Phase II	1.1	1.2	
Cumulative Emissions (tons) – Phase III	1.6	1.8	

Sources: USEPA 2003, USACE Mobile District 2007

Note: * Assumes 16 miles per trip, two trips per day, 240 days of work, 50% relocated from outside AQCR

Table E-28. Roll-up of Operational Emissions

Current Space	6,200,000 ft ²	
Additional Space - Phase I	2,046,000 ft ²	
Additional Space - Phase I+II	3,286,000 ft ²	
Additional Space - All Phases	6,126,000 ft ²	
Estimated Actual Emissions (tpy)		
	NO_x	VOC
Boilers		
Phase I (33%)	3.3	0.4
Phase I+II (54%)	5.3	0.6
All Phases (100%)	9.9	1.2
Generators		
Phase I	5.4	0.7
Worker Commutes – Full time Staff		
Phase I	0.6	0.7
Phase I+II	1.1	1.2
All Phases	1.6	1.8
Total Operational Emissions		
Phase I	9.3	1.8
Phase I+II	11.8	2.6
All Phases	16.9	3.7

E.3 Record of Non-Applicability

Record of Non-Applicability (RONA) to the General Conformity Rule for the Proposed Campus Development Project at Fort Meade, Maryland

August 30, 2010

Air emissions were estimated for the construction and operation of the proposed 5.8 million square feet of facilities and associated support infrastructure associated with all phases of the Campus Development projects for the National Security Agency (NSA) campus on Fort Meade, Maryland. Notably, the development would be implemented over the next 20 years; therefore, emissions in any given year would be limited. Emissions from land clearing and grading, construction of buildings, associated parking areas and structures, and support utility upgrades were assessed. Operational emissions from emergency generators, boilers, and personnel commutes were assessed. General Conformity under the Clean Air Act, Section 176 has been evaluated according to the requirements of 40 CFR 93.153, Subpart B. Regardless of the alternative ultimately implemented, the requirements of this rule are not applicable because:

The highest total annual direct and indirect emissions from this action have been estimated at 51.2 tons NO_x and 7.8 tons VOCs per year, which would be below the conformity threshold values of 50 tons VOCs and 100 tons for NO_x, and would not be *regionally significant* (i.e. greater than 10% of the region's total emissions).

Supporting documentation and emission estimates:

- Are Attached
- Appear in the NEPA Documentation
- Other (Not Necessary)



SIGNATURE

Senior Environmental Engineer

TITLE
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