



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

March 12, 2010

Ms. Katrina M. Scarpato
Environmental Section Chief
Facilities Management & Services Programs Division
General Services Administration
The Strawbridge Building
20 North Eighth Street, 8th Floor
Philadelphia, Pennsylvania 19107

Re: Foreign Affairs Security Training Center, Queen Anne's County, Maryland

Dear Ms. Scarpato,

The Environmental Protection Agency (EPA) has become aware of the Environmental Assessment (EA) under preparation by the General Services Administration (GSA), in compliance with the National Environmental Policy Act (NEPA) of 1969 and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1508), for the Foreign Affairs Security Training Center (FASTC) project. In accordance with EPA authority under NEPA, Section 309 of the Clean Air Act, and authority for the protection of aquatic, EPA has offered an informal opinion and suggestions to GSA on NEPA compliance for the FASTC project.

The property being investigated by GSA, in Ruthsburg, Queen Anne's County, Maryland, is proposed to be developed as a training facility for the U.S. Department of State, Bureau of Diplomatic Security. The proposed facility will be designed for training up to 10,000 students per year, and require venues such as anti-terrorism driving tracks, indoor and outdoor firing ranges, explosive demolition ranges, as well as classrooms, offices and accommodations. Money for the project is from the American Recovery and Reinvestment Act. The property selected as the preferred alternative location is currently farmland in eastern Maryland, bordered by Tuckahoe State Park in the watershed of Choptank River in the Chesapeake Bay watershed. There has been considerable public interest and objection to the project, as noted in public hearings held in January and February 2010. EPA has received comments through its website and by letter.

GSA has begun work on an EA to study approximately 2000 acres of land being proposed for use in the development of the FASTC. A cursory review of available GIS environmental data indicate the property to have a high potential for natural resources, and to be adjoining area designated in Maryland's Green Infrastructure program as a hub and corridor for wildlife passage

and habitat. EPA believes that the project may adversely affect the aquatic and terrestrial environment, including wetlands and, potentially, endangered species. We also believe that a determination of jurisdictional wetlands, their current and potential functions and values will need to be established. Avoidance of wetland and streams resources, and appropriate protection of water quality, should be maximized. EPA has discussed the project with GSA and stated the opinion that though in accordance with NEPA process, a decision may be reached at the conclusion of the EA to expand the study and prepare an Environmental Impact Statement (EIS), it might be prudent for GSA to consider an EIS at this stage of investigation. It has been the experience of EPA Region III that projects of a similar nature, requiring large land transfer and development, in a sensitive area, have been studied and publically vetted through the EIS process. EPA has stated to GSA that a key issue of an EIS is evaluation of alternatives. In that vein we suggest that GSA demonstrate that other properties were identified through an adequate investigation and found impracticable or to have potentially more significant environmental impact.

EPA appreciates GSA's consideration of our concerns, and would be pleased to discuss the project further. The EPA contact for the project is Ms. Barbara J Rudnick, NEPA Team Leader; she can be reached at 215-814-3322.

Sincerely,



Jeffrey D. Lapp
Associate Director
Office of Environmental Programs

