Executive Director’s Recommendation
Commission Meeting: December 6, 2018

PROJECT
US Food and Drug Administration
Headquarters Consolidation at the Federal Research Center, White Oak Campus
Final Master Plan
10903 New Hampshire Avenue
Silver Spring, Maryland

SUBMITTED BY
United States General Services Administration

NCPC FILE NUMBER
MP201

NCPC MAP FILE NUMBER
3104.00(05.00)44839

APPLICANT’S REQUEST
Approval of final master plan

PROPOSED ACTION
Approve final master plan

ACTION ITEM TYPE
Staff Presentation

PROJECT SUMMARY
The General Services Administration (GSA) has submitted a final master plan and transportation management plan for the U.S. Food and Drug Administration (FDA) Headquarters Consolidation at the Federal Research Center (FRC), White Oak campus. The FDA headquarters is located along New Hampshire Avenue in Silver Spring, Maryland, approximately 1.6 miles north of the Capital Beltway (I-495). FDA currently occupies 130 acres within the western portion of the 662-acre FRC parcel. The FRC is an environmentally sensitive site with eight streams running through the site, including the Paint Branch Creek. Other environmental constraints include stream valley buffers, steep slopes, and forested areas.

For the last 20 years, GSA has been consolidating the FDA headquarters at White Oak. The Commission reviewed the original master plan in 1997, followed by updates in 2002, 2006, and 2009. Today, the FDA White Oak campus has a population of 10,987 employees housed in approximately 3.8 million gross square feet (gsf) of offices, laboratory, and special uses. FDA has 6,817 parking spaces (including approximately 475 visitor parking spaces) distributed in three garages and four surface parking lots. The existing parking ratio is one parking space for every 1.7 employees (1:1.7).

On August 3, 2017, Congress passed the FDA Reauthorization Act of 2017. This new legislation reauthorized the user fee programs necessary for continued support of the agency’s pre-market evaluation of prescription drugs, medical devices, generic drugs, and biosimilar products. Due to these Congressional mandates, FDA headquarters is projecting a significant increase in population over the next 15 years, to the target year of 2035. The purpose of the master plan is to accommodate future growth and further consolidate FDA operations. The master plan will accommodate approximately 7,018 additional employees, for a total population of 18,000 people, which includes funded staff vacancies, existing employees currently in leased space in suburban Maryland,
support staff, and future growth. Anticipating the implementation of Bus Rapid Transit (BRT), the master plan proposes a parking ratio of one space for every 1.8 employees (1:1.8) for a total of 11,615 parking spaces (10,000 for employees, plus 1,615 for visitors). This would result in an additional 4,798 parking spaces for the campus. The new parking will be built in parking garages, eliminating the majority of the surface parking that exists today within the FDA campus.

Since the Commission’s draft master plan review in June 2018, GSA has identified Alternative C: Two Large Tower Office Buildings as the preferred alternative. The preferred alternative addresses previous comments from the Commission and other stakeholders. The final design revises the massing to open up the east vista toward the forested areas of the FRC and provide a pedestrian scale at the ground level, activates the space between the towers, connects the commons to the new courtyard, eliminates the previously proposed sky bridge, and minimizes adverse effects to the historic view of Building 1 from New Hampshire Avenue. The final master plan will add 1.9 million gsf of new office, shared and special use space. Alternative C includes four office buildings: a 16-story and a 14-story office building located on the eastern end of the FDA Campus, and two additional office buildings of six and eight stories. It also includes a dining pavilion, a conference center, a visitor and transit center, a fitness center, distribution center, a communication center, a truck screening facility, and three new parking garages.

**KEY INFORMATION**

- Last summer, the Commission provided comments on the three action alternatives included in the draft master plan. The comments were organized into five topic areas including campus character and urban design, master plan alternatives, comments applicable to all alternatives, parking and transportation, and general comments.
- The final master plan addresses the Commission comments from the June 2018 draft master plan review by widening and activating the space between the towers, framing the view toward the east, providing a connection between the commons and the new courtyard, and minimizing adverse effects to the historic view of Building 1 from New Hampshire Avenue.
- At its June 2018 meeting, the Commission supported Alternative C (smaller twin towers) because it resulted in a balanced approach that generated the least amount of adverse environmental impacts, extended the original character and urban design framework of the FDA campus, minimized adverse effects to its historic setting, and responded to the surrounding context. The Commission did not support Alternative A (mid-rises) and requested additional information if the applicant wanted to pursue Alternative B (larger tower) as the preferred alternative.
- GSA conducted Section 106 consultation and determined that the undertaking would result in an adverse effect to the historic visual setting of the Main Administration Building (Building 1). The high-rise buildings will be taller than the existing buildings at the FDA campus and will be visible from New Hampshire Avenue.
- Constructed in 1945, Building 1 contributes to the US Naval Ordnance Laboratory Historic District, which was determined eligible for listing in the National Register in 1997. GSA and the Maryland State Historic Preservation Office executed a Memorandum of Agreement on November 5, 2018 to mitigate the adverse effects.
• GSA prepared an Environmental Impact Statement (EIS) to analyze the potential impacts from the proposed master plan. GSA executed a record of decision on November 14, 2018.

RECOMMENDATION

The Commission:

Approves the final master plan for the U.S. Food and Drug Administration Headquarters Consolidation at the Federal Research Center, White Oak Campus in Montgomery County, Maryland, but defers action of the East Parking Garage B with 1,496 spaces due to traffic and environmental impacts.

Notes that the final master will add approximately 1.9 million gross square feet of new office and special/shared use space to accommodate a population of 18,000 employees and support staff.

Notes that the applicant has selected Alternative C: Two Large Tower Office Buildings as the preferred alternative. Alternative C consists of four new office buildings: a 16-story and a 14-story tower with two additional mid-rises. It also includes a dining pavilion, a conference center, a visitor and transit center, a communications center, a fitness center, a distribution center, a truck screening facility, and three parking garages.

Finds that Alternative C maintains the campus architectural character and urban design framework, minimizes adverse effects to its historic setting, reduces environmental impacts, and responds to the surrounding context.

Commends the applicant for taking into account previous Commission comments to improve Alternative C. The final master plan refines the massing of the proposed towers to open up the east vista toward the forest from 72 to 135 feet and provide a pedestrian scale at the ground level. It connects the commons to the proposed courtyard, activates the space between the towers with landscape and programming, eliminates the previously proposed sky bridge, and improves the view of the proposed buildings from New Hampshire Avenue by complementing the symmetry and main architectural elements of Building 1.

Parking and Transportation

Finds that the number of proposed parking spaces has not significantly changed since the draft master plan review and the proposed parking ratio is the same.

Notes that the final master plan includes a total on-site parking capacity of 11,615 spaces, including 10,000 employee parking spaces (based on the projected campus population of 18,000), plus 1,615 visitor parking spaces.

Finds that the proposed parking ratio of one space for every 1.8 employees (1: 1.8) is within the 1:1.5-1:2 range established by the Transportation Element of the Comprehensive Plan.

Notes that the Maryland-National Capital Park and Planning Commission (including Montgomery and Prince George's Counties) continues to identify traffic as their main concern. As teleworking
trends continue to increase, they encourage the applicant to consider a parking ratio of one space per two employees to reduce single occupancy vehicle trips and increase transit ridership.

**Strongly encourages** FDA to set a long-term goal of one parking space for every two employees (1:2) by the end of construction in 2035, limiting the number of employee parking spaces to 9,000.

**Finds** that based on the *Transportation Technical Report* (2018 Master Plan Environmental Impact Statement Appendix G) 13 of the 25 study area intersections will fail (level of service E or F) in one or more peak hours due to planned developments and increases in background traffic, regardless of the FDA master plan implementation. With the proposed population increase at FDA, there will be 16 intersections operating at a failing condition.

**Notes** that the applicant has reduced the footprint of the proposed East Parking Garage B by approximately 30 percent (from 102,000 to 73,000 square feet) to minimize the environmental impacts as suggested by the Commission. The applicant has also reduced its parking capacity from approximately 1,794 to 1,496 spaces by relocating 298 spaces to the proposed Northwest Parking Garage A.

**Finds** that the proposed East Parking Garage B to be built in Phase 4 (~2030), located in a sensitive environmental area, continues to encroach into the stream valley buffer (1.21 acres) and requires a large amount of forest removal (1.31 acres).

**Finds** that reducing the footprint and number of parking spaces by 1,000 (from 1,496 to 496 spaces) would further reduce environmental impacts and result in a 1:2 parking ratio.

**Notes** that there will be a significant increase in residential density in the immediate vicinity of the FDA Campus over the next 15 years, including 5,000 new residential units directly adjacent to the campus at Viva White Oak, in addition to local/regional transportation improvements, which could reduce overall parking demand on the campus.

**Notes** that future local transportation improvements to alleviate congestion and reduce single occupancy vehicle in the White Oak area include bus rapid transit corridors along US 29/Columbia Pike (currently funded) and New Hampshire Avenue (not funded at this time).

**Defers** action of the proposed East Parking Garage B with the 1,496 spaces until the time of design and construction in Phase 4 of the master plan to better understand the impacts of the proposed land use and transportation improvements in the White Oak area.

**Requests** that at the time of submission, GSA include an updated Transportation Management Plan (TMP) that evaluates the performance and impacts of the planned transportation improvements (including BRT, bike share stations, bicycle network, Purple Line), housing trends, and changes in the transit mode share in the White Oak area to inform the Commission’s recommendation.

**Notes** that the applicant has modified the current TMP to address the following comments from the Commission:
• Provide a visitor parking analysis to justify the increase in visitor parking from 1,000 to 1,615 spaces.
• Expand the existing multi-use trail along New Hampshire Avenue to a minimum of ten feet.
• Provide continuous sidewalks and multi-use trails within the campus.
• Coordinate with the Maryland Department of Transportation to provide bikeshare stations and dockless bikes on campus, as well as throughout the surrounding community.
• Expand the commuter shuttle service to transit facilities in areas with higher concentrations of employee residences along the I-270 corridor.

Notes that GSA has committed to create a Memorandum of Understanding (MOU) with Montgomery County to consider road improvements, public transit connections, and park-and-ride facilities near the campus; and explore public access and amenities consistent with the security requirements of the FDA campus. The specific terms of the MOU will be outlined in the future.

General Comments

Notes that the applicant has provided the following information as requested by the Commission:
• Responses to comments provided by the Maryland National Capital Planning Commission (M-NCPPC), Maryland Department of Environment (MDE), Maryland Department of Transportation (MDOT), the Maryland Department of Transportation State Highway Administration (MDOT SHA) and Montgomery County Council.
• A campus-wide stormwater management plan, a landscape plan, and a tree preservation plan.

PROJECT REVIEW TIMELINE

<table>
<thead>
<tr>
<th>Previous actions</th>
<th>June 2018 – Approval of comments on three draft master plan alternatives.</th>
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<tbody>
<tr>
<td></td>
<td>December 2017 – Information presentation on the master plan for the FDA Consolidation at the Federal Research Center at White Oak, and site visit.</td>
</tr>
<tr>
<td></td>
<td>December 2009 – Approval of master plan and transportation management plan (TMP) update, requiring that the applicant conform to a parking ratio of 1 space per 1.5 employees by the end of construction in 2012, limiting the number of employee parking spaces to 5,926, based on the projected campus population of 8,889.</td>
</tr>
<tr>
<td></td>
<td>July 2006 - Approval of the 2006 master plan update and TMP for the FDA Consolidation at White Oak, and TMP with a parking ratio of 1 space per 1.5 employees through 2011, limiting the number of employee parking spaces to 5,141, based on the projected campus population of 7,719.</td>
</tr>
</tbody>
</table>
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June 2002 - Approval of the revised master plan and TMP for the FDA Consolidation at White Oak with a parking ratio of 1 space for every 2.0 employees at final build-out.

June 1997 - Approval of master plan for the FDA Consolidation at White Oak, except for the parking; requesting to meet the parking ratio of one space per two employees.

Remaining actions (anticipated) – none

PROJECT ANALYSIS

Executive Summary

The final master plan responds to previous comments from the Commission and other stakeholders. The selection of Alternative C as the preferred alternative is consistent with the Commission comments from the draft master plan review in June 2018. Alternative C strikes a balance among urban design and campus character, historic preservation, and environmental considerations. The final master plan will allow further consolidation of FDA employees and projected growth. It will provide the necessary office space to conduct the agency’s mission in a compact and walkable campus that promotes collaboration. Given the site’s unique environmental constraints, and impacts to traffic and transportation, we continue to have concerns about the proposed number of parking. In particular, we find that the proposed parking garage B, with 1,496 spaces, encroaches on the stream valley buffer and requires a significant amount of vegetation clearing. Therefore, staff recommends that the Commission approve the final master plan for the U.S. Food and Drug Administration Headquarters Consolidation at the Federal Research Center, White Oak Campus in Montgomery County, Maryland, but defer action of the East Parking Garage B with 1,496 spaces due to traffic and environmental impacts.

Analysis

Staff analysis on the final master plan focuses on key considerations such as urban design and campus character, historic preservation, environmental impacts, program, parking and transportation. In addition, it evaluates how the applicant has addressed the Commission comments from the June 6, 2018 draft master plan review.

Previous Commission Comments

Last summer, the Commission provided comments on the draft master plan. The comments were organized into five topic areas including: 1) background information, 2) analysis of the proposed master plan alternatives, 3) comments applicable to all alternatives, 4) parking and transportation, and 5) general comments.
1. **Background Information**

The Commission provided background information and focused on the campus urban design framework, historic preservation, existing and proposed development in the surrounding context, and environmental constraints.

The Commission noted that the last master plan and transportation management plan update for FDA at the White Oak Federal Research Center was approved in 2009. Due to the recent *FDA Reauthorization Act of 2017*, FDA is projecting a 64 percent increase in employees (from 10,987 to 18,000) over the next 15 years and is seeking to add approximately 1.6 million square feet of office and special use space to the current 3.8 million square feet of laboratory and office space.

The Commission found that FDA had successfully maintained the campus character and urban design framework that was established since the original 1997 master plan even as the campus continued to evolve over time. A hierarchy of open spaces help organize low-rise buildings. Buildings frame a series of small courtyards arranged around a large east-west central commons area, which provides expansive views to the existing forest to the east of the campus. A secondary axis rotated seven degrees to the south widens the opening of the commons to reinforce this visual connection.

Regarding historic preservation, the Commission noted that the Main Administration Building (Building 1) was the front door of the FDA campus. Constructed in 1945, the three-story building contributes to the US Naval Ordnance Laboratory Historic District, which was determined eligible for listing in the National Register of Historic Places in 1997. The Commission found that the historic view of Building 1 from New Hampshire Avenue had been maintained since the 1940s by gradually placing new buildings (ranging from 3 to 6 stories) further to the east in relationship with the topography to avoid projecting above the historic building.

With respect to the context, the commission noted that there were several existing high-rise residential buildings in the area surrounding the campus, ranging from 19-22 stories. In addition, this area is growing rapidly due to the rezoning implemented as a result of the *Montgomery County’s 2014 White Oak Science Gateway Master Plan* which allows for high-density development with heights up to 220 feet. Lastly, the Commission noted that the site was environmentally constrained with a total of eight streams running through the site, including the Paint Branch Creek and its tributaries. Other constraints include stream valley buffers, steep slopes, and forested areas.

2. **Master Plan Alternatives**

The Commission found that the applicant provided three action alternatives with differences in urban design and campus character, historic preservation, environmental impacts and program. The Commission organized the alternatives by level of support:

1. “Smaller Twin Towers” - Alternative C, consisted of five new office buildings: two 14-story buildings (218 feet), a six and a seven-story building, and a two-story conference
center. Alternative C proposed 1,573,124 additional square feet with two 14-story office buildings, and a seven-story building around an enclosed courtyard located on the east side of the commons. It also included a six-story office building surrounding a two-story conference center on the northwest, and four new parking structures.

2. “Mid-Rises” - Alternative A, consisted of five new office buildings up to 10-stories tall (137 feet). Alternative A proposed 1,589,161 additional square feet with three ten-story office buildings around a courtyard on the eastern end of the commons; an eight-story office building on the southeast, a two-story conference center on the northwest, and four new parking structures.

3. “Large Tower” - Alternative B, consisted of four new office buildings: one large 20-story tower (298 feet), two mid-rises, and a two-story conference center. Alternative B proposed 1,748,834 additional square feet with a 20-story office tower, and an eight-story courtyard building located on the eastern end of the commons. It also included a six-story office building around a two-story conference center on the northwest quadrant, and three new parking structures.

The Commission supported Alternative C (Smaller Twin Towers) because it resulted in a balanced approach that generated the least amount of adverse environmental impacts, extended the original character and urban design framework of the FDA campus, minimized adverse effects to its historic setting, and responded to the surrounding context. The Commission recommended five changes to improve the design: 1) refining the massing of the towers to open up the east vista and provide a more pedestrian friendly scale at the ground level, 2) connecting the commons to the proposed courtyard, 3) activating the space between the towers, 4) eliminating the proposed sky bridge between the towers, and 5) further studying the view of the proposed buildings from New Hampshire Avenue to complement the symmetry and main architectural elements of Building 1.

The Commission did not support Alternative A (Mid-Rises) because even though it maintained the historic viewshed of the campus from New Hampshire Avenue, it had the most significant impact on the environment, lacked an efficient and compact layout, and was not consistent with the FDA campus original urban design framework and character.

The Commission found that Alternative B (Large Tower) significantly changed the character of the campus and surrounding community by providing a tall architectural icon. Alternative B had greater adverse environmental and historic viewshed impacts than Alternative C and provided the largest program of the alternatives. The Commission requested that, if the applicant wanted to pursue Alternative B as the preferred alternative, the applicant provided at final review an explanation whether the additional square footage (approximately 165,000 square feet) could be accommodated in the other alternatives and the benefits of the single tower approach. The Commission also requested additional visual studies from Columbia Pike (Route 29), and the Capital Beltway, taking into consideration the proposed future development in the area, to better understand the visual impacts in the larger context.

Preferred Development Alternative
Since the draft master plan review, the applicant has revised the program and provided a consistent square footage among all the alternatives. GSA conducted further evaluation and determined that
they needed additional building area to accommodate approximately 18,000 employees and support staff. As mentioned in the background information section, the June 2018 draft master plan included approximately 1.6 million square feet of office and special use space. The final master plan now includes approximately 335,000 square feet of additional office space. Therefore, staff notes that the final master will add approximately 1.9 million gross square feet of new office and special/shared use space to accommodate a population of 18,000 employees and support staff. The additional square footage does not affect the number of parking spaces or parking ratio, as the overall campus population has not changed.

The applicant has also selected Alternative C as the preferred alternative and revised the design to address comments from the Commission and other stakeholders. Staff notes that the applicant has selected Alternative C: Two Large Tower Office Buildings as the preferred alternative. Alternative C consists of four new office buildings: a 16-story and a 14-story tower with two additional mid-rises. It also includes a dining pavilion, a conference center, a visitor and transit center, a communications center, a fitness center, a distribution center, a truck screening facility, and three parking garages.

The preferred alternative combines many of the positive aspects of Alternatives B & C and is compatible with the architectural character and historic setting of the campus by continuing the massing and material strategy established under previous master plans. Therefore, staff finds that Alternative C maintains the campus architectural character and urban design framework, minimizes adverse effects to its historic setting, reduces environmental impacts, and responds to the surrounding context.

The total proposed building area is approximately 1,920,624 gross square feet (gsf), including 1.6 million gsf of office space plus 280,000 to 350,000 gsf of shared/special use space. Table 1 shows a built-out comparison among the 2009 master plan, existing conditions, and the 2018 master plan.

<table>
<thead>
<tr>
<th>Summary</th>
<th>2009 Master Plan</th>
<th>Existing Conditions</th>
<th>2018 Master Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total employment</td>
<td>8,889</td>
<td>10,987</td>
<td>18,000</td>
</tr>
<tr>
<td>Total employee parking</td>
<td>5,926 spaces</td>
<td>6,342 spaces</td>
<td>10,000 spaces</td>
</tr>
<tr>
<td>Total visitor parking</td>
<td>1,000 spaces</td>
<td>475 spaces</td>
<td>1,615 spaces</td>
</tr>
<tr>
<td>Total Parking</td>
<td>6,926 spaces</td>
<td>6,817 spaces</td>
<td>11,615 spaces</td>
</tr>
<tr>
<td>Structured Parking</td>
<td>2.3 million</td>
<td>996,975</td>
<td>3.5 million</td>
</tr>
<tr>
<td>Office</td>
<td>2.4 million</td>
<td>2.8 million</td>
<td>4.4 million</td>
</tr>
<tr>
<td>Lab</td>
<td>679,000</td>
<td>636,670</td>
<td>636,670</td>
</tr>
<tr>
<td>Shared use * and other special uses**</td>
<td>473,000</td>
<td>239,464</td>
<td>616,756</td>
</tr>
<tr>
<td>Vivarium</td>
<td>75,000</td>
<td>73,118</td>
<td>73,118</td>
</tr>
<tr>
<td>Total gross square footage</td>
<td>5.9 million</td>
<td>4.8 million</td>
<td>9.2 million</td>
</tr>
<tr>
<td>Parking ratio</td>
<td>1:1.5</td>
<td>1:1.7</td>
<td>1:1.8</td>
</tr>
</tbody>
</table>

Table 1: FDA Headquarters Build-Out Comparison

*Shared use is also integrated into other buildings on the FDA Campus.
**Other uses include: Distribution Center, Communication Center, Fitness Center, Child Care Center, and tunnels/bridges.**

As shown in Table 2 below, the preferred alternative includes four office buildings, including a 16-story and 14-story tower and two additional buildings of six and eight-stories.

<table>
<thead>
<tr>
<th>Proposed Office Buildings</th>
<th>Building Heights/Number of stories</th>
<th>Area (square feet)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building A</td>
<td>6 levels (67 feet)</td>
<td>281,024</td>
</tr>
<tr>
<td>Building B</td>
<td>14 levels (197 feet)</td>
<td>375,983</td>
</tr>
<tr>
<td>Building C</td>
<td>16 levels (222 feet)</td>
<td>447,876</td>
</tr>
<tr>
<td>Building D *</td>
<td>8 levels (99 feet)</td>
<td>503,988</td>
</tr>
<tr>
<td>Total New Office</td>
<td></td>
<td>1,608,871</td>
</tr>
</tbody>
</table>

*Table 2: FDA Headquarters 2018 Master Plan – Proposed Office Space
* includes 6,500 sf Fitness Center, and 6 levels above Commons

Table 3 shows the shared/special use space included in preferred alternative.

<table>
<thead>
<tr>
<th>Proposed Special Use and Shared Use</th>
<th>Building Heights/Number of stories</th>
<th>Area (square feet)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Communications Center</td>
<td>1 level below plaza</td>
<td>67,070</td>
</tr>
<tr>
<td>Conference Center</td>
<td>2 levels (33 feet)</td>
<td>60,000</td>
</tr>
<tr>
<td>Truck Screening</td>
<td>1 level (20 feet)</td>
<td>10,000</td>
</tr>
<tr>
<td>Visitor/Transit Center</td>
<td>1 level (33 feet)</td>
<td>15,000</td>
</tr>
<tr>
<td>Dining Pavilion*</td>
<td>2 levels (21 feet)</td>
<td>18,000</td>
</tr>
<tr>
<td>Distribution Center</td>
<td>3 levels (52 feet)</td>
<td>105,000</td>
</tr>
<tr>
<td>Chemical Distribution Center</td>
<td>1 level (18 feet)</td>
<td>1,000</td>
</tr>
<tr>
<td>Total Shared/Special use</td>
<td></td>
<td>276,070</td>
</tr>
</tbody>
</table>

*Table 3: FDA Headquarters 2018 Master Plan – Proposed Shared/Special Use
* One level above plaza

As mentioned above, the Commission recommended five changes to improve Alternative C. The following narrative explains how the applicant responded to these comments.

1) The Commission requested that the applicant refine the massing of the proposed 14-story buildings to open up the east vista and provide a more pedestrian friendly scale at the ground level. In order to address the Commission comments, the design team moved Building B further north to anchor the buildings along the northern arm of the commons. Similarly, they relocated Building C to anchor the buildings along the southern arm of the commons. As a result, the relocated towers increase the view from the Commons toward the east from the previously proposed 72 feet (Alternative C June 2018) to 135 feet. In addition, the design team added two additional stories (from 14 to 16 stories) to Building C to accommodate a refined program. The 16-story Building C transitions into an eight-story courtyard building (Building D) immediately to the north to provide a more pedestrian friendly scale at the ground level. This move preserves the urban design...
character of the original master plan, which established a view of approximately 300 feet toward the east.

2) The Commission requested that the applicant provide a visual and pedestrian connection from the commons to the newly proposed courtyard at the eastern end of the campus. The final design creates a physical and visual connection between the commons and the courtyard by constructing a portion of Building D on two-story columns. The final master plan includes an eight-story building (6 levels above commons) surrounding a two-level courtyard. The design integrates stairs into the paving to allow people to access the two lower levels from the commons. The upper courtyard includes a lawn to create a continuous green effect as viewed from the plaza level. The lower courtyard includes plants adapted for shade along the southern face to cool the air between the buildings. Taller plants or smaller trees will be seen from the plaza level to continue the green view. The courtyard will include built-in seat walls to further activate this space.

3) The Commission requested that the applicant consider programming, landscape, public art, and streetscape elements to activate the space between the two towers and frame the east view. The final master plan extends the commons to meet the new buildings creating new gardens and gathering spaces. The extended commons is at the same level at the existing commons. Since the natural grade slopes toward the east, the new commons area is built above the existing grade. The Communication Center is housed in the space below the commons. The landscape plan includes a “Feature Lawn” between the towers for a gathering node along the commons, consisting of a flexible green space that emphasizes views to the forest and acts as an overlook at the end of the commons. The Feature Lawn could be programmed for special events or temporary exhibits; accommodate movable tables and chairs to help activate the area on a daily basis and provide lighting to frame the space.

4) As requested by the Commission, the final master plan eliminates the proposed sky bridge between the towers to preserve the view toward the east of the campus, since the buildings are already connected below the plaza level.

5) Lastly, the Commission requested that the applicant further study the view of the proposed buildings from New Hampshire Avenue and complement the symmetry and main architectural elements of Building 1. The design team moved the proposed towers (Building B and C) to align with the northern and southern arms of the commons respectively. This design move increase the distance further off center from Building 1 to be more sympathetic to the historic viewshed from New Hampshire Avenue.

GSA has addressed all of the Commission comments regarding Alternative C. Therefore, staff commends the applicant for taking into account previous Commission comments to improve Alternative C. The final master plan refines the massing of the proposed towers to open up the east vista toward the forest from 72 to 135 feet and provide a pedestrian scale at the ground level. It connects the commons to the proposed courtyard, activates the space between the towers with landscape and programming, eliminates the previously proposed
sky bridge, and improves the view of the proposed buildings from New Hampshire Avenue by complementing the symmetry and main architectural elements of Building 1.

3. Comments Applicable to all Alternatives

During draft master plan review, the Commission provided four comments applicable to all alternatives regarding the location of the dining pavilion, distribution center, and parking; and the configuration of the conference center.

1) The Commission preferred the location of the dining pavilion in Alternative C within the commons (which could be accommodated in any of the alternatives) because it would further activate this large open space, promote informal interaction, and frame the viewshed toward the forested areas to the east. The draft master plan included two potential locations for a new cafeteria. One option located the new cafeteria within the proposed courtyard (Alternatives A and B), and the other option included a freestanding dining pavilion located within the commons area (Alternative C). As requested by the Commission, the final master plan includes a dining pavilion within the commons. The dining pavilion is the main gathering area and the entry plaza leading to the “Feature Lawn” which is positioned to collect people and allow for seating options along the way.

2) The Commission also preferred the proposed conference center surrounded by an L-shape office building, as shown in Alternatives B and C, because it took advantage of an already disturbed site. The final master plan includes a two-story conference center surrounded by an L-shape building (Building A). In order to increase the office program, the final master plan adds a new five-story building on the southern side of Building A, and a new seven-story building on the eastern side of Building D. The final master plan also reduces the low-rise buildings to 64 feet in width to allow more natural light and improve the opportunity to become Net Zero Energy.

3) The Commission preferred the location of the distribution center below the newly extended plaza, as shown in Alternatives A and C, because this location consolidated loading areas, and was closer to the buildings and commons, yet separated from pedestrian circulation. The distribution center was included in the 2009 master plan adjacent to the existing Northeast Parking Garage. The loading dock of the distribution center would serve the entire campus. The distribution center was connected to an existing service tunnel network that links all the buildings on the campus. The June 2018 draft master plan proposed two locations for the distribution center: below the extended plaza (Alternative A and C), or at the same location that was considered during the 2009 master plan (Alternatives B). In both cases, the distribution center would connect directly into the existing tunnel network. Last summer, staff encouraged the applicant to consolidate access to public facilities and minimize curb cuts, where possible. The final master plan locates the distribution center adjacent to the Northeast Parking Garage, the same location as the 2009 master plan. GSA indicated the distribution center location adjacent to the Northeast parking garage best suited FDA’s operations from a security perspective because of its direct connection to the
existing tunnel network and proximity to the proposed truck screening facility. Staff supports the location of the distribution center at the periphery.

4) Finally, the Commission noted that locating parking below the proposed buildings would help to reduce environmental impacts. GSA indicated that locating parking below the proposed buildings was not possible due to security and cost. Based on the FDA’s security assessment, the minimum standoff distance required would prevent placing parking garages under the office buildings. Parking garages below federal offices buildings would require a full inspection of all vehicles entering the garages. This would impose high operational costs on the FDA campus. In addition, costs for underground parking are considerably higher, potentially up to 2-3 times the cost per space.

4. Parking and Transportation

During the draft master plan review, the Commission provided the following notes and findings regarding parking and transportation:

- In 2009, the Commission required the applicant to conform to a parking ratio of one space for every 1.5 employees by the end of construction in 2012, limiting the number of employee parking spaces to 5,926, based on the projected campus population of 8,889, and 1,000 additional parking spaces for visitors, for a total of 6,926 parking spaces.
- Today, FDA is exceeding the approved parking ratio because two garages were not built. The campus has a total parking capacity of 6,817 parking spaces (including 475 spaces for visitors), which equates to a parking ratio of one space for every 1.7 employees based on the existing campus population of 10,987.
- The 2018 master plan includes a total on-site parking capacity of 11,615 spaces, including 10,000 employee parking spaces (based on the projected campus population of 18,000), plus 1,615 visitor parking spaces.
- The proposed parking ratio of one space for every 1.8 employees (1: 1.8) is within the 1:1.5-1:2 range established by the Transportation Element of the Comprehensive Plan.
- Montgomery and Prince George’s counties have identified traffic as their main concern because the area is already congested and will grow worse in the future based on a significant increase in density around the FDA campus.

The Commission encouraged FDA to set a long-term goal of one parking space for every two employees (1:2) by the end of construction in 2035, limiting the number of employee parking spaces to 9,000.

The Commission found that the proposed parking garage with approximately 2,000 spaces to be built in Phase 4 (~2030) located at the east end of the campus adjacent to the reconfigured East Loop Road encroaches into the sensitive stream valley buffer and requires a large amount of forest removal. The Commission also found that reducing the footprint and number of parking spaces in half (to 1,000 spaces) would reduce environmental impacts and result in a 1:2 parking ratio.

In order to address the comments from the Commission, the final master plan reduces the size of Garage B footprint (located on the eastern end of the commons) by approximately 30 percent to
accommodate the increased footprint of the adjacent office space (Building D) and minimize the impacts to the tree canopy. The final plan relocates 298 parking spaces to garage A, and adds an additional level to Garage B. As shown in Table 4 below, when compared to the draft master plan, Garage B has a reduction in the number of parking spaces of 298 spaces. The impacts on forest removal have been minimized by 0.61 acres. However, there is an increase on the SVB impacts by 1.2 acres. The final master plan indicates that depending on when phase four is implemented, Garage B could be reduced further in size if modern technology becomes available reducing the demand for parking spaces.

<table>
<thead>
<tr>
<th>EAST PARKING GARAGE B</th>
<th>DRAFT MASTER PLAN (Alternative C)</th>
<th>FINAL MASTER PLAN (Preferred Alternative)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Parking Spaces</td>
<td>1,794</td>
<td>1,496</td>
</tr>
<tr>
<td>Number of Levels</td>
<td>6</td>
<td>7</td>
</tr>
<tr>
<td>Footprint</td>
<td>101,660</td>
<td>72,663</td>
</tr>
<tr>
<td>Stream Valley Buffer (SVB)</td>
<td>0.017 acres</td>
<td>1.219 acres</td>
</tr>
<tr>
<td>Forest</td>
<td>1.92 acres</td>
<td>1.31 acres</td>
</tr>
</tbody>
</table>

*Table 4: Comparison of East – Parking Garage B at draft and final master plan*

<table>
<thead>
<tr>
<th></th>
<th>Parking Summary</th>
<th>DRAFT MASTER PLAN (Alternative C)</th>
<th>FINAL MASTER PLAN (Preferred Alternative)</th>
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</thead>
<tbody>
<tr>
<td>Northwest Garage A</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parking Spaces</td>
<td>2,067 spaces</td>
<td>2,962 spaces</td>
<td></td>
</tr>
<tr>
<td>Number of Levels</td>
<td>4 levels</td>
<td>6 levels</td>
<td></td>
</tr>
<tr>
<td>East Garage B</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parking Spaces</td>
<td>1,794 spaces</td>
<td>1,496 spaces</td>
<td></td>
</tr>
<tr>
<td>Number of Levels</td>
<td>6 levels</td>
<td>7 levels</td>
<td></td>
</tr>
<tr>
<td>Southeast Garage C</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parking Spaces</td>
<td>2,700 spaces</td>
<td>2,884 spaces</td>
<td></td>
</tr>
<tr>
<td>Number of Levels</td>
<td>7 levels</td>
<td>7 levels</td>
<td></td>
</tr>
<tr>
<td>West Garage D*</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Parking Spaces</td>
<td>580 spaces</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Number of Levels</td>
<td>6 levels</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Total Parking**</td>
<td>7,141 spaces</td>
<td>7,342 spaces</td>
<td></td>
</tr>
</tbody>
</table>

*Table 5: Comparison Parking Garages between draft and final master plan*

*Garage D has been replaced by the Distribution Center in the final master plan
**New parking includes replacement of existing 2,544 parking spaces displaced by new buildings, and assumes parking at 1 space per 1.8 Employees*

Table 5 shows a parking comparison between the draft and final master plans. When compared with the draft master plan, the final master plan includes four changes regarding parking and transportation:

- Moving the visitor and transit center further south to decrease the walking distance to the main entrance at Building 1 as requested by the Montgomery County Department of Transportation. The BRT will have a stop at this location along with public buses and shuttles.
• Increasing the footprint of Garage C (located on the southeast) from 2,700 spaces to 2,884 spaces.
• Replacing the previously proposed western garage (560 spaces) with the distribution center
• Increasing the size of Garage A (located on the northwest) from 2,067 spaces to approximately 3,000 spaces, in response to the changes in the location of the transit center, the reduction of Garage B, and elimination of the western garage. Increasing its height from four to six levels. This garage will accommodate visitor and employee parking.

Although the massing of the three proposed parking garages has changed, staff finds that the number of proposed parking spaces has not significantly changed since the draft master plan review and the proposed parking ratio is the same.

Notes that the final master plan includes a total on-site parking capacity of 11,615 spaces, including 10,000 employee parking spaces (based on the projected campus population of 18,000), plus 1,615 visitor parking spaces.

Reiterates that the proposed parking ratio of one space for every 1.8 employees (1:1.8) is within the 1:1.5-1:2 range established by the Transportation Element of the Comprehensive Plan.

Strongly encourages FDA to set a long-term goal of one parking space for every two employees (1:2) by the end of construction in 2035, limiting the number of employee parking spaces to 9,000.

Finds that based on the Transportation Technical Report (2018 Master Plan Environmental Impact Statement Appendix G) 13 of the 25 study area intersections will fail (level of service E or F) in one or more peak hours due to planned developments and increases in background traffic, regardless of the FDA master plan implementation. With the proposed population increase at FDA, there will be 16 intersections operating at a failing condition.

Notes that the applicant has reduced the footprint of the proposed East Parking Garage B by approximately 30 percent (from 102,000 to 73,000 square feet) to minimize the environmental impacts as suggested by the Commission. The applicant has also reduced its parking capacity from approximately 1,794 to 1,496 spaces by relocating 298 spaces to the proposed Northwest Parking Garage A.

Finds that the proposed East Parking Garage B to be built in Phase 4 (~2030), located in a sensitive environmental area, continues to encroach into the stream valley buffer (1.21 acres) and requires a large amount of forest removal (1.31 acres).

Finds that reducing the footprint and number of parking spaces by 1,000 (from 1,496 to 496 spaces) would further reduce environmental impacts and result in a 1:2 parking ratio.

Notes that there will be a significant increase in residential density in the immediate vicinity of the FDA Campus over the next 15 years, including 5,000 new residential units directly adjacent to the campus at Viva White Oak, in addition to local/regional transportation improvements, which will likely influence the overall parking needs of the campus.
Notes that future local transportation improvements to alleviate congestion and reduce single occupancy vehicle in the White Oak area include bus rapid transit corridors along US 29/Columbia Pike (currently funded) and New Hampshire Avenue (not funded at this time).

In June 2018, the Commission deferred support for the proposed footprint and number of parking spaces for this garage until it was able to evaluate improvements to the local/regional network and an update of the Transportation Management Plan (TMP) closer to the time of design and construction.

Staff reiterates that the Commission defer action of the proposed East Parking Garage B with the 1,496 spaces until the time of design and construction in Phase 4 of the master plan to better understand the impacts of the proposed land use and transportation improvements in the White Oak area.

Requests that at the time of submission, GSA include an updated Transportation Management Plan (TMP) that evaluates the performance and impacts of the planned transportation improvements (including BRT, bike share stations, bicycle network, Purple Line), housing trends, and changes in the transit mode share in the White Oak area to inform the Commission’s recommendation.

During draft master plan review, the Commission requested that the TMP for the final submission include the following information and mitigation measures:

- Submit additional justification to support the proposed increase in visitor parking spaces from 1,000 to 1,615 spaces.
- Coordinate with Montgomery and Prince George’s counties to improve and maximize connections to Bus Rapid Transit, Purple Line, proposed bicycle network and trails.
- Provide continuous sidewalks, and multi-use trails within the campus connecting to the surrounding off-site network, in particular to nearby transit stations, including Lockwood Drive.
- Consider allowing the regional Paint Branch Trail to continue through the FDA campus along the Paint Branch Stream Valley Buffer, working with FDA security staff to determine appropriate access points, pathways and hours of operation.
- Consider a 10-foot wide multi-use trail within the historic green buffer that connects to the existing bicycle lane along New Hampshire Avenue and explore recreational uses.
- Coordinate with Maryland Department of Transportation to provide bike share stations and allow dockless bikes on campus and establish an internal bike-share system throughout the FDA campus.
- Expand shuttle service to adjacent mixed-use developments, such as Viva White Oak.
- Consider nearby commercial parking space available in private or public facilities, such as White Oak Shopping Center.

The final master plan includes a visitor parking analysis to justify the increase in visitor parking spaces from 1,000 to 1,615 spaces. GSA calculated the amount of visitor parking by increasing the number of existing visitor parking at a ratio that matches the increase in on-site population. GSA indicated that the proposed visitor-parking ratio is consistent with the guidance provided in the
Urban Land Institute (ULI) Shared Parking Manual. The ULI recommends a visitor parking ratio of 0.2 spaces per 1,000 square feet for office, and notes that parking should make up seven to eight percent of total parking supply. Due to the increase in public meeting space, and amount of occupied space, FDA expects a proportionate increase in the demand for visitor parking. The demand of visitor parking at White Oak is generated by the following activities:

- Daily interaction with government and contract personnel (badged) who are not assigned to the White Oak Campus.
- Daily and routine interaction with business/public personnel.
- Routine large public meetings required to be open to the public (fluctuating attendance).
- New Employee orientation activities occurring two days every two weeks (fluctuating attendance).
- Daily requirements to have personnel from the trades and services arrive in support of facilities and infrastructure project work.

Staff notes that the applicant has modified the current TMP to address the following comments from the Commission:

- Provide a visitor parking analysis to justify the increase in visitor parking from 1,000 to 1,615 spaces.
- Expand the existing multi-use trail along New Hampshire Avenue to a minimum of ten feet.
- Provide continuous sidewalks and multi-use trails within the campus.
- Coordinate with the Maryland Department of Transportation to provide bikeshare stations and dockless bikes on campus, as well as throughout the surrounding community.
- Expand the commuter shuttle service to transit facilities in areas with higher concentrations of employee residences along the I-270 corridor.

5. General Comments

At its June 2018 meeting, the Commission requested that the applicant provide responses to any comments from government agencies and the Montgomery County Council, a stormwater management plan and a landscape and tree preservation plan.

The Final EIS includes responses to comments received on the draft EIS, including the inter-agency referral comments, such as the Maryland-National Capital Park and Planning Commission and other government agencies. The FEIS can be found on the GSA FDA HQ White Oak website. The Record of Decision (ROD) includes responses to comments on the Final EIS. The ROD can be found on NCPC’s website as part of the submission materials. GSA has also provided responses to the May 15, 2018 letter from Montgomery County Councilmember Tom Hucker. These responses are attached to the staff report.
Stormwater Management
The final master plan includes a stormwater management plan that implements environmental site design strategies (ESD) in accordance with the Maryland Department of the Environment and Section 438 of the Energy Independence and Security Act. The proposed low impact development/ESD strategies include micro-bioretention facilities; bio-swales along roads; rooftop rainwater harvesting for toilet flushing and cooling tower makeup water; green roofs; pervious pavements for fire lanes, sidewalks, paths, and other hardscape areas; tree planting and stream restoration. Overall, the preferred alternative will reduce impervious areas by providing structured parking instead of parking lots, maximizing the office building heights, and providing pervious pavement. Other measures include submerged gravel wetlands, and expansion of an existing stormwater management pond.

Landscape Plan
The campus expands along the existing organizing geometry, extending walkways and plazas to access the new office buildings, parking garages, and visitor center. The expanded commons will continue to function as the central green space promoting walkability between buildings. The existing artistic garden will become a pivotal point in the landscape interrupting the curvilinear walkways. The commons will include a tree grove to provide shade and more intimate gathering spaces, a flexible lawn for larger gatherings, and a feature garden at the end of the Commons. Outdoor dining under the canopy of the dining pavilion will activate the lawn. The landscape plan includes a variety of trees, shrubs, and perennials should to connect the interior of the campus to the surrounding landscape and tie the grounds back to the ecological context of the region.

Tree Replacement
The submission materials indicate that GSA will develop a Forest Conservation Plan in compliance with Montgomery County’s Forest Conservation Law and the MD State Forest Conservation Act. The plan will outline compensatory mitigation to offset the loss of forest and vegetation.

Staff notes that the applicant has provided the following information as requested by the Commission:

- Responses to comments provided by the Maryland National Capital Planning Commission (M-NCPPC), Maryland Department of Environment (MDE), Maryland Department of Transportation (MDOT), the Maryland Department of Transportation State Highway Administration (MDOT SHA) and Montgomery County Council.
- A campus-wide stormwater management plan, a landscape plan, and a tree preservation plan.

CONFORMANCE TO EXISTING PLANS, POLICIES AND RELATED GUIDANCE

Comprehensive Plan for the National Capital

The final master plan is consistent with the Comprehensive Plan for the National Capital. In particular the Urban Design, Federal Workplace, Transportation, Federal Environment, and Historic Preservation Elements.
**National Historic Preservation Act**

Pursuant to the National Capital Planning Act, NCPC’s review authority over federal projects outside the District of Columbia is advisory, and therefore, in carrying out its review of the project NCPC does not have an independent obligation to satisfy the requirements of Section 106 of the National Historic Preservation Act (NHPA).

In 1945, the Navy began construction of the Naval Ordnance Laboratory (NOL), the facility was renamed in the 1970s as the Naval Surface Warfare Center. In 1996, 662 acres of the 710-acre site were transferred to GSA and renamed the Federal Research Center. The NOL Historic District was determined eligible for inclusion in the National Register of Historic Places in 1997. Since 2001, 130 acres of the western portion of the FRC were redeveloped for the FDA.

The nomination form documented 372 resources on the site, which included 260 contributing resources and 112 non-contributing resources. The resources included buildings, structures, landscape, and utilities. The golf course at the western and southern edges of the property was identified as the only contributing landscape feature, providing a “physical and natural buffer which preserves the visual character of the main complex” and was also important as an amenity “conceived, built, and maintained entirely by the employees” of the NOL. GSA, FDA, the Maryland State Historic Preservation Office (MD SHPO) and the Advisory Council on Historic Preservation (ACHP) executed a Memorandum of Agreement (MOA) on July 10, 2002 regarding the 2002 revised master plan. Under this MOA, a number of historic resources within the boundaries of the FDA campus (100 area) were documented and removed during the campus development. Historic resources retained in this area include Building 1 (Administration Building), Building 100 (Fire House) and the flagpole.

GSA and the MD SHPO executed a new MOA on November 5, 2018 for the 2018 master plan, and concurrently terminated the 2002 MOA. GSA conducted three consulting parties meetings (refer to Table 6). NCPC participated as a consulting party. GSA determined that the undertaking would have an adverse effect on the setting of contributing Building 1 of the National Register-eligible NOL Historic District. The proposed towers located behind Building 1 will be visible from New Hampshire Avenue. Historically, Building 1 has been the most visible prominent building in the NOL Historic District. As part of the mitigation measures, GSA has committed to re-evaluate the boundaries of the NOL Historic District in light of the cumulative effects of approved undertakings under previous MOAs (2002 and 2003), including the evaluation of the contributing status of individual buildings, structures, sites, objects and landscapes. GSA will submit a determination of eligibility form for the re-evaluation of the NOL Historic District to the SHPO. GSA will nominate the re-evaluated NOL Historic District for listing in the National Register, if the NOL historic district is deemed to retain eligibility.

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<tr>
<th></th>
<th>Consulting Parties Meeting Date</th>
<th>Discussion Topic</th>
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<tbody>
<tr>
<td>CP #1</td>
<td>November 14, 2017</td>
<td>Introduction and Alternatives</td>
</tr>
<tr>
<td>CP #2</td>
<td>April 4, 2018</td>
<td>Adverse Effects</td>
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<tr>
<td>CP #3</td>
<td>May 21, 2018</td>
<td>Adverse Effects and Agreement</td>
</tr>
</tbody>
</table>

*Table 6: List of CP Meetings*
National Environmental Policy Act

Pursuant to the National Capital Planning Act, NCPC’s review authority over federal projects outside the District of Columbia is advisory, and therefore, in carrying out its review of the project NCPC does not have an independent NEPA obligation. GSA, in cooperation with FDA, completed an Environmental Impact Statement (EIS) to assess the impacts of the proposed master plan. GSA conducted public scoping in summer 2017, issued a Draft EIS in February 2018 and a Final EIS in September 2018. GSA issued a record of decision (ROD) on November 14, 2018. NCPC staff provided scoping comments on September 25, 2017, followed by comments on the DEIS on April 18, 2018, and comments on the FEIS on October 15, 2018.

<table>
<thead>
<tr>
<th>Meeting Date</th>
<th>Discussion Topic</th>
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<tr>
<td>September 12, 2017</td>
<td>Scoping Meeting</td>
</tr>
<tr>
<td>March 22, 2018</td>
<td>Public Hearing Findings on DEIS</td>
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</tbody>
</table>

Table 7: List of Public Meetings for NEPA purposes

The EIS analyzed a no-action and three action alternatives: Alternative A: Mid-Rise Buildings, Alternative B: One Large Tower Office Building, and Alternative C: Two Large Office Buildings. The ROD identified Alternative C as the preferred alternative because it balanced the potential adverse impacts to the FRC and the local community with the mission and needs of the FDA. In addition, the preferred alternative would help create a compact walkable campus and provide the necessary office space to conduct the complex reviews mandated by Congress. The configuration of buildings reinforces and extends the campus/courtyard concept, adds places for creative exchanges and collaboration to foster scientific innovation, creates state-of-the-art work spaces that will attract world-class scientist, and stimulates public confidence in FDA’s operations.

Overall, the ROD analyzed 14 environmental resources. It identified major, long-term, direct, adverse impacts associated with two resources: soils, topography and geology; and traffic and transportation. It identified moderate, long-term, adverse impacts under two resources: surface water and wetlands, and vegetation. It identified an adverse effect under cultural resources. Finally, it identified minor, long-term adverse impacts under seven resources: wildlife, air quality, greenhouse gas and climate change, community facilities and services, safety and security, utilities, and waste management. Land Use Planning and Zoning was considered a negligible, long-term, adverse impact, and economy and employment was minor, long-term, indirect, beneficial impact. NCPC staff evaluated the ROD and found the analysis and mitigation measures acceptable.

CONSULTATION

Coordination with Federal, State, and Local Agencies

Based on the intergovernmental referral policy included in NCPC’s Submission Guidelines, GSA and NCPC referred the draft master plan and TMP for a 60-day intergovernmental review period to the Maryland Clearinghouse on March 12, 2018. The Maryland-National Capital Park and Planning Commission (M-NCPPC) provided a comment letter on May 22, 2018. The Montgomery
County Planning Department reviewed the final EIS issued in September 2018 and provided a comment letter on October 12, 2018. The comments from both letters are summarized below.

**Maryland National Capital Park and Planning Commission (M-NCPCC)**

At its May 16, 2018 meeting, the full M-NCPCC, comprised of Montgomery and Prince George’s counties, reviewed the draft master plan as a “mandatory referral.” By letter dated May 22, 2018, M-NCPCC transmitted consolidated comments from both counties to NCPC. They identified four major topics of concern, including transportation, environment, historic preservation, parks and open space, and recommended identified the following mitigation measures:

- Adopting a 1:2 parking ratio to help relieve congestion in the White Oak area.
- Working with the Maryland Department of Transportation on the implementation of Bus Rapid Transit on New Hampshire Avenue and US 29.
- Working with the Maryland Department of Transportation to provide opportunities for commuter bus routes to the FDA campus.
- Coordinating with the County on potential pedestrian and bicycle connections.
- Exploring additional east-west connections through the FRC site.
- Providing a vehicular connection between FDA and the White Oak Center.
- Avoiding stormwater management facilities adjacent or within stream valley buffers.
- Focusing reforestation/afforestation efforts within environmentally sensitive areas, such as steep slopes in stream valley buffers.
- Providing access and active and passive recreational use within the green buffer space along New Hampshire Avenue (former golf course) and encouraging coordination with M-NCPCC's Montgomery County Department of Parks.
- Creating a Memorandum of Understanding to include mitigation measures for the transportation, environmental, historical, and park impacts resulting from the 2018 master plan.

Although the final master plan was not a mandatory referral, the Montgomery County Planning Department reviewed the final EIS and provided a comment letter to GSA on October 12, 2018. They reiterated their previous comments and focused on mitigation strategies to address impacts on transportation, environment, historic preservation, and parks and open space. Montgomery County recommended that the federal government provide significant contributions to mitigate traffic congestion, particularly funding for BRT on New Hampshire Avenue, a future BRT transit station in the White Oak Center, a connection from FDA campus to the White Oak Center, and MCDOT bike share stations on the FDA campus. Staff notes that the Maryland-National Capital Park and Planning Commission (including Montgomery and Prince George's Counties) continues to identify traffic as their main concern. As teleworking trends continue to increase, they encourage the applicant to consider a parking ratio of one space per two employees to reduce single occupancy vehicle trips and increase transit ridership.

Lastly, they requested GSA/FDA to consider a Memorandum of Understanding (MOU) with the county that includes the mitigation recommendations outlined in their October 12, 2019 letter as
well as potential strategies going forward. GSA provided responses to Montgomery County’s comments on the Final EIS as Appendix B in the Record of Decision (available on the NCPC website). In summary, GSA stated that they would continue to coordinate with Montgomery County to explore access and joint/shared use options. However, the specifics of the access and/or connection points would be solidified during the MOU process; not as part of the master plan. Staff notes that GSA has committed to create a Memorandum of Understanding (MOU) with Montgomery County to consider road improvements, public transit connections, and park-and-ride facilities near the campus; and explore public access and amenities consistent with the security requirements of the FDA campus. The specific terms of the MOU will be outlined in the future.

ONLINE REFERENCE

The following supporting documents for this project are available online at www.ncpc.gov:

- Submission Package
- Project Synopsis
- Record of Decision
- Section 106 Memorandum of Agreement

ATTACHMENTS

1. Powerpoint
2. GSA responses to letter from Montgomery County Councilmember Tom Hucker

Prepared by Vivian Lee
11/29/2018
ATTACHMENT 1

Powerpoint
U.S. Food and Drug Administration Headquarters Consolidation at the Federal Research Center, White Oak Campus

10903 New Hampshire Avenue, Silver Spring, Maryland

Approval of Final Master Plan

United States General Services Administration
Site Location

Location Map

- FDA Campus
- Hillandale Local Park
- Fire Station
Master Plan Evolution

1997 Master Plan (NCPC Approval - June 26, 1997)

2002 Master Plan (NCPC Approval - July 7, 2002)

2006 Master Plan (NCPC Approval - July 6, 2006)

2009 Master Plan (NCPC Approval - December 3, 2009)

2018 Master Plan
Existing Conditions
Proposed Alternatives

Alternative A: Mid-Rise Office Buildings

Alternative B: One Large Tower Office Building

Alternative C: Mid-Rise Office Buildings (Twin Towers) – Preferred
Alternative A: Mid-Rise Office Buildings

June 2018 – Draft Master Plan

December 2018 – Final Master Plan

View from Commons – Draft Master Plan

New Hampshire Avenue View – Draft Master Plan
Alternative B: One Large Tower Office Building

June 2018 – Draft Master Plan

December 2018 – Final Master Plan

View from Commons – Draft Master Plan

New Hampshire Avenue View – Draft Master Plan
Alternative C: Mid-Rise Office Buildings (Twin Towers)

June 2018 – Draft Master Plan

December 2018 – Final Master Plan (Combination of Alternatives B & C)

View from Commons – Draft Master Plan

New Hampshire Avenue View – Draft Master Plan
Preferred Development Alternative: Alternative C

- Garage A: 2,902 spaces
  - Phase 1: 1,750 spaces
  - Phase 2: 1,212 spaces
- Distribution Center: 3 levels
  - 16,782 ft² / 1,550 m²
- Visitors/Transit Center: 1 level
  - 10,973 ft² / 1,004 m²
- Truck Screening: 1 level
  - 6 m / 20 ft
  - 929 m² / 10,000 ft²
- Conference Center: 2 levels
  - 10,377 ft² / 955 m²
- Building A: 6 levels
  - 50 levels above grade
  - 39,686 ft² / 3,681 m²
- Building B: 14 levels
  - 30 m / 100 ft
  - 41,069 ft² / 3,819 m²
- Building C: 16 levels
  - 60 m / 200 ft
  - 41,069 ft² / 3,819 m²
- Building D: 6 levels
  - 48,632 ft² / 4,474 m²
- Garage B: 7 levels
  - 1,486 spaces
- Garage C: 7 levels
  - 2,864 spaces
- Chemical Distribution Center: 1 level
  - 6 m / 20 ft
  - 929 m² / 10,000 ft²
- Dining Pavilion: 2 levels
  - One level Above Plaza
  - 1,072 ft² / 100 m²

Total Proposed New Building Area: 178,432 ft² / 17,494 m² (Office and Special Spaces Only)
- Total Proposed Office: 148,866 ft² / 13,727 m²
- Total Proposed Special Use and Shared Use: 29,566 ft² / 2,767 m²

Total New Parking: 7,342 Spaces (7,342 spaces needed)
* Proposed total varies slightly from program requirement.
* New parking includes replacement of existing parking displaced by new buildings, and assumes parking at 1 space per 1.8 employees.
View from the Commons Looking East

Existing Conditions

June 2018 – Draft Master Plan (Alternative C)

June 2018 – Draft Master Plan (Alternative B)

December 2018 – Final Master Plan (Alternative C)
View from Commons: Proposed Conditions
View from Commons to New Development

A portion of Building D is constructed on two-story pilotis to create a physical and visual connection between the Commons and the courtyard.
View from New Hampshire Avenue: June 2018

Alternative B, Draft Master Plan

Alternative C, Draft Master Plan
View from New Hampshire Avenue
View from New Hampshire Avenue

Building C will be seen slightly above Building 1 at the Mahan Road circle.
South New Hampshire Avenue View
New Hampshire and Michelson Road View
Preferred Development Alternative - Concept Diagram

- Central Axis from Building 1
- Cross Axis
- Southern Arm of Commons
- Visual Connection to Nature

LEGEND
- New Development
- Axial Relationship

Scale 1:5,000

Figure 3-6: Preferred Development Alternative Concept Diagram
Preferred Development Alternative - Site Plan

**Legend**
- New Development
- Existing Buildings

**Site Plan Details**
- **Garage A**
  - 6 levels
  - 2,962 spaces
  - Phase 1: 1,750 spaces
  - Phase 2: 1,212 spaces

- **Truck Screening**
  - 1 level
  - 6 m/20 ft
  - 929 m² / 10,000 ft²

- **Visitors/Transit Center**
  - 1 level
  - 10m/33 ft
  - 1,324 m² / 15,000 ft²

- **Conference Center**
  - 2 levels
  - 10,933 ft²
  - 9,574 m² / 100,000 ft²

- **Building A**
  - 6 levels
  - (5 Levels above grade)
  - 20 m/67 ft
  - 26,108 m² / 281,024 ft²

- **Distribution Center**
  - 3 levels
  - 16,082 ft²
  - 9,735 m² / 105,000 ft²

- **Building B**
  - 14 levels
  - 60 m / 197 ft
  - 34,930 m² / 375,983 ft²

- **Building C**
  - 16 levels
  - 68 m / 222 ft
  - 51,800 m² / 447,876 ft²

- **Garage B**
  - 7 levels
  - 1,458 spaces

- **Building D**
  - 8 levels
  - (6 Levels above Common)
  - 30 m/99 ft
  - 46,922 m² / 503,988 ft²
  - (Includes Fitness Center, 604 m²/6,500 ft²)

- **Garage C**
  - 7 levels
  - 2,884 spaces

- **Chemical Distribution Center**
  - 1 level
  - 6 m/16 ft
  - 93 m² / 1,000 ft²

- **Dining Pavilion**
  - 2 Levels (One Level Above Plaza, 7 m/23 ft)
  - 1,672 m² / 18,000 ft²

- **Communications Center**
  - 1 Level below Plaza
  - 6,231 m² / 67,670 ft²
Preferred Development Alternative - Ground Floor Plan
Sections

East - West
Phase 1

**Phase 1 Summary**

**Building(s), Roadway(s) and Improvement**

The construction of the Distribution Center and Truck Screening Facility is of critical importance to the operation of the campus. They would be both built in the first phase. In addition, a significant portion of Garage A would also be constructed. Doing so would both relieve the current parking shortage on site, but also provide parking capacity for future phases to be implemented, as all of the future phases remove existing surface parking lots.

<table>
<thead>
<tr>
<th>Building</th>
<th>Size</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Distribution Center</td>
<td>9,766 m² / 105,000 ft²</td>
<td></td>
</tr>
<tr>
<td>Chemical Distribution Ctr</td>
<td>93 m² / 1,000 ft²</td>
<td></td>
</tr>
<tr>
<td>Truck Screening Facility</td>
<td>929 m² / 10,000 ft²</td>
<td></td>
</tr>
</tbody>
</table>

**Phase 1 Total**

10,777 m² / 116,000 ft²

Garage A Phase 1

1,750 spaces
Phase 2 Summary
Building(s), Roadway(s) and Improvement
Phase 2 will include realignment of the NW Loop Road, construction of Office Building A, the Conference Center, Visitor Center and the remainder portion of Garage A.

<table>
<thead>
<tr>
<th>Phase 2 Total</th>
<th>Cumulative Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building A 26,108 m² / 281,024 ft²</td>
<td>33,076 m² / 356,024 ft²</td>
</tr>
<tr>
<td>Conference Center 5,574 m² / 60,000 ft²</td>
<td>26,394 m² / 274,024 ft²</td>
</tr>
<tr>
<td>Visitor/Transit Center 3,394 m² / 15,000 ft²</td>
<td>43,852 m² / 472,024 ft²</td>
</tr>
<tr>
<td>Garage A Phase 2 1,212 spaces</td>
<td></td>
</tr>
<tr>
<td>Cumulative Total 2,962 spaces</td>
<td></td>
</tr>
</tbody>
</table>
Phase 3

Phase 3 Summary

Building(s), Roadway(s) and Improvement

Phase 3 includes the construction of Parking Garage C in the SE Quad and realignment of the SE Loop Road. This garage is necessary to permit the largest phase to proceed as the final phase.

SE Loop Road

No buildings to be constructed in this phase

<table>
<thead>
<tr>
<th>Building</th>
<th>Cumulative Total</th>
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<tbody>
<tr>
<td>Garage C</td>
<td>2,684 spaces</td>
</tr>
<tr>
<td></td>
<td>5,846 spaces</td>
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</tbody>
</table>
Phase 4

Phase 4 Summary
Building(s), Roadway(s) and Improvement

Phase 4 is the construction of Buildings B, C & D, Elevated Plaza, Communication Center, Dining Pavilion and Garage B. At approximately 1.4M GSF this is largest single phase. They could be easily reversed based on the availability of funds.

<table>
<thead>
<tr>
<th>NW Loop Road</th>
<th>Building B</th>
<th>Building C</th>
<th>Building D</th>
<th>Communication Center</th>
<th>Dining Pavilion</th>
<th>Misc. shared use</th>
<th>Phase 4 Total</th>
<th>Cumulative Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>34,930 m² / 375,983 ft²</td>
<td>41,609 m² / 447,876 ft²</td>
<td>46,822 m² / 509,988</td>
<td>6,231 m² / 67,070</td>
<td>3,145 m² / 33,850</td>
<td>1,838 m² / 19,79</td>
<td>134,579 m² / 1,448,680</td>
<td>178,432 m² / 1,930,624</td>
</tr>
</tbody>
</table>

Garage B

<table>
<thead>
<tr>
<th>Garage B</th>
<th>Cumulative Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>1,495 spaces</td>
<td>7,342 spaces</td>
</tr>
</tbody>
</table>

Figure 3-13: Preferred Development Alternative Phasing Diagram
Streetscape and Landscape Concept Diagram

**LEGEND**
- **Existing**
  - Commons
  - Garden
  - Paving
- **Proposed**
  - Structures
  - Special Paving
  - Walkway
  - Un-Mowed Planting
  - Mowed Lawn
  - Bio-Retention Area / Rain Garden
  - Restored Detention Basin*

*Area to be evaluated for invasive species removal and additional plantings including wetland and native grass species

Scale 1:5,000

0 50 100 200 400m
Illustrative Plan

1. New Office Building
2. New Parking Garage
3. Distribution Center
4. New Conference & Visitor Center
5. New Dining
6. Potential Truck Screening Facility
7. Transit Hub and Bus Bays
8. Dining Pavilion

SUSTAINABLE FEATURES
1. Proposed Green Roof
2. Rooftop Solar Panels
3. Permeable Paving
4. Stormwater Management Area
5. Stream Restoration Planting
6. Naturalized Edge Planting
7. Preserved Forest

Scale: 1:5,000

NORTH
Commons Enlarged Plan
Plant Palette

- Flowering Natives: Bio Retention Bed
- Red Maple Allees: Feature Lawn
- Groundcover Tapestry: Shade Garden
- Sedge Grass: Bio Retention Bed
- Honey Locust: Tree Grove
- Cinnamon Fern: Shade Garden

SECTION A-A

- BIO-RETENTION BED
- TREE GROVE
- FEATURE LAWN (BEYOND)
- SHADE GARDEN
Perimeter Security Diagram

Preferred Development Alternative
Perimeter Security Plan

Legend:
- 25’ Standoff
- 75’ Standoff
- Site Perimeter
- Vehicle Barrier
- Outer Perimeter Fence
- Restricted Access Road
- Permanent Gate
- Pedestrian Entrance Security Point
- Service Access Point
- Inner Campus Perimeter
- New Building
- New Building Garage
- Existing Building
- Existing Building Garage
- Entrance Function

Figure 3.19: Preferred Development Alternative Perimeter Security Diagram
Circulation Diagrams

Figure 3-19: Preferred Development Alternative Campus Vehicular Circulation

Figure 3-20: Preferred Development Alternative Campus Bus and Shuttle Service Diagram

Figure 3-21: Preferred Development Alternative Campus Bicycle Circulation

Figure 3-22: Preferred Development Alternative Campus Truck Screening, Service Access and Delivery
Circulation Diagrams

Figure 3-23: Preferred Development Alternative Plaza Level Pedestrian Circulation Diagram

Figure 3-24: Preferred Development Alternative Fire Truck Access Diagram

Figure 3-25: Preferred Development Alternative Elevated (2nd Level) Pedestrian Circulation Diagram
Tree Removal Diagram

Figure 4.7: Preferred Development Alternative: Tree Removal Diagram
Impacts to Vegetation
Tree Planting Framework

- Naturalized Edge
  - Un-mowed grasses
  - Flowering perennials
  - Native under-story Trees

- Stream Restoration
  - Un-mowed grasses/reeds
  - Native bare-root trees

- Loop Road
  - Buffer for trail users
  - Provides Shade
Stormwater Management Plan

LEGEND
- Bio-swale
- Schematic locations for Micro Bio-Retention Facilities
- Rainwater capture and reuse
- Green Roof
- Submerged Gravel Wetland Area
- Re-design and expansion of Existing SWM Pond #1; Replaces function of SWMP #3 (removed)

Scale: 1:5,000
NORTH
ATTACHMENT 2

GSA responses to letter from Montgomery County Councilmember Tom Hucker
May 15, 2018

Chairman L. Preston Bryant, Jr.
National Capital Planning Commission
401 9th Street, NW, Suite 500N
Washington, DC 20004

Dear Chairman Bryant,

Thank you for the opportunity to comment on the 2018 FDA Federal Research Center Master Plan and Draft Environmental Impact Statement (EIS). As the Montgomery County councilmember for this area, I am excited about the prospect of new jobs and investment in White Oak.

However, I am concerned about the potential transportation and public safety impacts that these new employees will bring. Therefore, I am asking the National Capital Planning Commission to consider the following improvements to the proposed Master Plan:

1. It is unclear whether the existing transportation network can handle the additional traffic to and from the FDA campus. Include a public connection between the FDA campus and Lockwood Drive to improve vehicular, pedestrian and bicyclist connectivity for employees and visitors to the campus;

2. Several federal facilities include public thoroughfares on their campus, including the nearby Beltsville Agricultural Research Center. Include a public connection from New Hampshire Avenue through the FDA campus to either Viva White Oak or Cherry Hill Road;

3. Participate in the County Transportation Management Program, which reduces traffic by encouraging telework, flexible work hours and non-auto driver modes of transportation, among other things;

4. Allow a County Bikeshare station on the FDA campus to connect with other bike nodes in the area;

5. There is regional precedent for federal agencies contributing to transit improvements. Provide funding for the New Hampshire Avenue Bus Rapid Transit (BRT) line, which
the Council is funding for planning and design in the FY19-24 Capital Improvements Program;

6. Engage the County and the Hillandale Volunteer Fire Department on the possible purchase of additional land for four additional apparatus bays to continue meeting the fire safety needs of this growing community; and

7. Explore a possible Memorandum of Understanding (MOU) with the Planning Department, County Department of Transportation and State Highway Administration for the Master Plan implementation going forward.

Thank you for considering these changes to the Master Plan and EIS. If you have any questions or concerns, please feel free to contact me or my staff at (240)777-7960 or councilmember.hucker@montgomerycountymd.gov.

Sincerely,

Tom Hucker
Responses to Councilman Tom Hucker’s comments – Montgomery County Council, May 15, 2018

Comment 1: The impacts to the existing transportation network were analyzed and provided in the Transportation Technical Report (Appendix G of the Final EIS). A connection to the White Oak Center is not a part of this Master Plan and therefore, has not been analyzed in the EIS. However, GSA/FDA remains committed to working with the County to identify methods to connect the on-campus transit center with the White Oak Transit Center on Lockwood Drive.

Comment 2: Comment noted. GSA will continue to work with Montgomery County to explore access and joint/shared use options that are compatible with the mission and security requirements of the FDA campus.

Comment 3: GSA completed a Transportation Management Plan for the FDA Campus that reduces single-occupancy vehicle (SOV) trips; promotes the use of alternative transportation modes, such as transit, carpooling, and vanpooling; and, increases vehicle occupancy. GSA/FDA have always been committed, and will remain committed, to working with the County and other stakeholders to implement strategies to reduce drive-alone mode share. Including the pedestrian, bicycle, and transit recommendations in the TMP will ensure that they are updated to reflect changing needs.

Comment 4: A bikeshare or scooter-share system is being considered on-campus. The details of the program will be refined outside of the master planning process. Bikeshare and/or dockless bikes are listed under the bike/walk to work category in the most current iteration of the TMP.

Comment 5: Comment noted.

Comment 6: GSA through its Urban Planning and Good Neighbor Program is committed to exploring ways to provide public access to government lands. GSA is working with the M-NCPPC to review the inputs collected during the NEPA process and collaborate to identify possible uses. Possible opportunities will have to be explored and reviewed for consistency with and compatibility with the Level IV Security Requirements of the FDA Campus which restrict access of public vehicles and pedestrian access beyond security checkpoints.

Comment 7: GSA will coordinate with Montgomery County to create a MOU. The specific terms of the MOU will be outlined at that time.